

Final Environmental Assessment/ Finding of No Significant Impact

Island School Updated Master Plan

Puhi, Līhu‘e, Kaua‘i, Hawai‘i

Tax Map Key: (4) 3-8-002: 016

Prepared For

**ISLAND SCHOOL
3-1875 Kaumuali‘i Highway
Līhu‘e, Kaua‘i, Hawai‘i 96766-9597**

Prepared By

**WILSON OKAMOTO CORPORATION
1907 South Beretania Street, Suite 400
Honolulu, Hawai‘i 96826**

January 2013

***FINAL ENVIRONMENTAL ASSESSMENT
and
FINDING OF NO SIGNIFICANT IMPACT***

**ISLAND SCHOOL
UPDATED MASTER PLAN**

Puhi, Līhu‘e District, Island of Kaua‘i, Hawai‘i

Tax Map Key: (4) 3-8-002: 016

Prepared For:

**Island School
3-1875 Kaumuali‘i Highway
Līhu‘e, Kaua‘i, Hawai‘i 96766-9597**

Prepared By:

**Wilson Okamoto Corporation
Engineers and Planners
1907 South Beretania Street, Suite 400
Honolulu, Hawai‘i 96826**

January 2013

TABLE OF CONTENTS

	<u>Page</u>
PREFACE	P-1
PROJECT SUMMARY	S-1
1. INTRODUCTION	1-1
1.1 Introduction.....	1-1
1.2 Project Location.....	1-3
1.3 Background	1-3
1.4 Existing and Surrounding Uses	1-6
2. PROJECT DESCRIPTION	2-1
2.1 Project Need.....	2-1
2.2 Project Description	2-1
2.3 Sustainable Strategies	2-3
2.4 Development Schedule	2-4
3. DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES	3-1
3.1 Climate	3-1
3.2 Geology, Topography and Soils	3-1
3.3 Hydrology	3-6
3.3.1 Surface Waters.....	3-6
3.3.2 Ground Water	3-10
3.3.3 Coastal Waters	3-10
3.4 Natural Hazards	3-11
3.4.1 Flood Hazard	3-11
3.4.2 Hurricanes/Strong Winds and Earthquakes	3-13
3.5 Flora	3-13
3.6 Fauna	3-14
3.7 Agricultural Resources	3-17
3.8 Air Quality.....	3-18
3.9 Noise	3-18
3.10 Hazardous Materials	3-19
3.11 Historic and Archaeological Resources.....	3-19
3.12 Cultural Resources.....	3-23
3.13 Visual Resources	3-26
3.14 Traffic	3-26
3.15 Socio-Economic Characteristics.....	3-32
3.16 Civil Defense	3-35
3.17 Police and Fire Protection Services	3-35
3.18 Medical Services	3-35
3.19 Schools.....	3-36
3.20 Recreational Facilities	3-36
3.21 Solid Waste Disposal	3-37
3.22 Utilities.....	3-37
3.22.1 Wastewater System.....	3-37
3.22.2 Water System	3-38

TABLE OF CONTENTS (CONTINUED)

	<u>Page</u>
3.22.3 Drainage System	3-38
3.22.4 Electrical and Communications Systems	3-39
4. RELATIONSHIP TO LAND USE PLANS AND POLICIES	4-1
4.1 State Land Use District.....	4-1
4.1.1 Conformance to the State Urban District Standards	4-1
4.2 Hawai'i State Plan	4-9
4.3 Hawai'i Coastal Zone Management Program.....	4-12
4.4 County of Kaua'i General Plan	4-19
4.5 County of Kaua'i Līhu'e Development Plan.....	4-23
4.6 County of Kaua'i Comprehensive Zoning Ordinance	4-24
4.7 County of Kaua'i Special Management Area.....	4-24
5. ALTERNATIVES TO THE PROPOSED ACTION.....	5-1
5.1 No Action Alternative.....	5-1
6. REQUIRED PERMITS AND APPROVALS.....	6-1
7. NOTICE OF DETERMINATION	7-1
8. REFERENCES	8-1
9. CONSULTATION	9-1
9.1 Pre-Assessment Consultation	9-1
9.2 Draft Environmental Assessment Consultation	9-2

List of Figures

	<u>Page</u>
Figure 1-1 Location Map	1-2
Figure 1-2 Tax Map Key: (4) 3-8-002: 016.....	1-4
Figure 1-3 Photo Key Map	1-7
Figure 1-3a Project Site Photos	1-8
Figure 1-3b Project Site Photos	1-9
Figure 1-3c Project Site Photos	1-10
Figure 2-1 Conceptual Master Site Plan	2-2
Figure 3-1 Soils Map.....	3-2
Figure 3-2 University of Hawai'i Land Study Bureau Map	3-4
Figure 3-3 Agricultural Lands of Importance in the State of Hawai'i Map	3-5
Figure 3-4 Surface Waters Map.....	3-7
Figure 3-5 Historic Surface Features Map	3-9
Figure 3-6 Flood Zone Map	3-12
Figure 4-1 Existing State Land Use Districts Map	4-2
Figure 4-1a Proposed State Land Use Districts Map.....	4-3
Figure 4-1b Proposed State Land Use Districts Map With Kaua'i Community College	4-6

TABLE OF CONTENTS (CONTINUED)**List of Figures (Continued)**

	<u>Page</u>
Figure 4-2 Existing County of Kaua'i General Plan Land Use Map	4-20
Figure 4-2a Proposed County of Kaua'i General Plan Land Use Map	4-22
Figure 4-3 Līhu'e Development Plan Land Use Map	4-25
Figure 4-4 County of Kaua'i Zoning Map	4-26

List of Tables

	<u>Page</u>
Table 1 Evaluation of Historic Features	3-22
Table 2 Existing and Projected Year 2020 (Without Project) Traffic Operating Conditions	3-30
Table 3 Projected Year 2020 (Without and With Project) Traffic Operating Conditions.....	3-31
Table 4 Population and Housing Characteristics: 2010	3-32
Table 5 Social and Economic Characteristics: 2010.....	3-34

Appendices

Appendix A:	Biological Surveys of the Island School Campus, Prepared by Rana Biological Consulting, Inc. and AECOS Consultants, September 24, 2010
Appendix B:	Archaeological Literature Review and Field Inspection for the Island School State Land Use District Boundary Amendment Project, Prepared by Cultural Surveys Hawai'i, Inc., January 2013 And Letter from the State Department of Land and Natural Resources, Historic Preservation Division Dated October 26, 2012
Appendix C	Cultural Impact Assessment for the Kaua'i Community College Redesignation to Urban District Project, Prepared by Cultural Surveys Hawai'i, Inc., April 2012
Appendix D	Traffic Impact Report for the Island School Master Plan, Prepared by Wilson Okamoto Corporation, December 2010

(This page is intentionally left blank)

PREFACE

This Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) is prepared pursuant to Chapter 343, Hawai'i Revised Statutes (HRS), and Title 11, Chapter 200, Administrative Rules, Department of Health, State of Hawai'i. Proposed is an Applicant Action by Island School, Petitioner, to update its master plan to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. The proposed master plan for the 38.448-acre campus updates the current master plan approved through a Special Permit, Use Permit and Class IV Zoning Permit by the County of Kaua'i (County) Planning Commission on April 26, 2005.

The Petitioner is seeking to amend the County General Plan Land Use Map for the Island School campus (Petition Area) from the Agriculture designation to the Urban Center designation, and then reclassify the Petition Area from the State Agricultural District to the State Urban District. The reclassification of the Petition Area will allow the improvements in the proposed updated Island School master plan to be implemented without a State Special Permit. The need to amend the Petition Area from the County General Plan Agriculture designation to the Urban Center designation, and to reclassify from the State Agricultural District to the Urban District, is to be more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaumuali'i Highway. Preparation of this EA is required for the proposed County General Plan Amendment pursuant to Chapter 343, HRS, and Title 11, Chapter 200, Hawai'i Administrative Rules. In conjunction with this EA, the Petition for General Plan Amendment has been filed with and is being concurrently processed by the County Planning Department.

(This page is intentionally left blank)

PROJECT SUMMARY

Petitioner:	Island School 3-1875 Kaumuali'i Highway Līhu'e, Kaua'i, Hawai'i 96766-9597
Approving Agency:	County of Kaua'i Planning Department 4444 Rice Street, Suite 473 Līhu'e, Hawai'i 96766
Location:	Puhi, Līhu'e District, Kaua'i, Hawai'i
Tax Map Key (TMK):	(4) 3-8-002: 016
Petition Area:	38.448 acres
Recorded Fee Owner:	Island School 3-1875 Kaumuali'i Highway Līhu'e, Kaua'i, Hawai'i 96766-9597
Existing Use:	Island School campus, and areas of undeveloped, vegetated land
State Land Use Classification:	Agricultural District
County General Plan:	Agriculture
Līhu'e Development Plan:	Agriculture
County Zoning:	Agriculture District (A) and Open District (O)
Special Management Area (SMA):	Outside of the SMA boundaries
Proposed Action:	Island School is proposing an update of its master plan to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. An increase of approximately 22 full-time equivalent (FTE) faculty and staff, to the current 62 FTE members, for a total of 84 FTE members, will be required for the future increase in student enrollment. The proposed master plan for the 38.448-acre campus updates the current master plan approved through a Special Permit, Use Permit and Class IV Zoning Permit by the County of Kaua'i (County) Planning Commission on April 26, 2005.

The proposed updated master plan includes new, renovated and expanded classroom buildings; expanded administration facility and visual arts facility; new facilities, including science building, campus center, dining facility, auditorium and stage, arts education building, back-of-house building and courtyard, robotics shed, outdoor science area, maintenance facility, and informal gathering areas; playground and sports facilities, including physical education (P.E.) facilities, track and football field, soccer field, baseball field, softball field, and outdoor swimming pool; internal loop road with bus parking spaces; school and community drop-off areas; and, additional parking spaces.

The Petitioner is seeking to amend the County General Plan Land Use Map for the Island School campus (Petition Area) from the Agriculture designation to the Urban Center designation, and then reclassify the Petition Area from the State Agricultural District to the State Urban District. The reclassification of the Petition Area will allow the improvements in the proposed updated Island School master plan to be implemented without a State Special Permit. The need to amend the Petition Area from the County General Plan Agriculture designation to the Urban Center designation, and to reclassify from the State Agricultural District to the Urban District, is to be more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaumuali'i Highway.

Impacts:

No significant impacts are anticipated from the proposed amendments to the County General Plan and State land use designations and development of the project improvements.

**Required Permits
& Approvals:**

State of Hawai'i

Department of Business, Economic Development and Tourism, Land Use Commission

- State Land Use District Boundary Amendment

Department of Health

- National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity

Department of Land and Natural Resources, Historic Preservation Division

- Chapter 6E, HRS, Historic Preservation

County of Kaua'i

Planning Department

- County General Plan Amendment
- Use Permit
- Class IV Zoning Permit

Department of Public Works

- Grading Permit
- Building Permit
- Drainage System Requirements

Department of Water:

- Water and Water System Requirements

Utility Companies

- Utility Service Requirements

**Agencies Consulted
In Pre-Assessment
Process:**

Federal

U.S. Army Corps of Engineers, Civil Works Technical Branch
U.S. Army Corps of Engineers, Regulatory Branch
U.S. Geological Survey
U.S. Fish and Wildlife Service
U.S. Department of Agriculture, Natural Resources Conservation Service

State of Hawai'i

Department of Agriculture
Department of Accounting and General Services
Department of Business, Economic Development and Tourism
Department of Business, Economic Development and Tourism, Land Use
Commission
Department of Business, Economic Development and Tourism, Office of
Planning
Department of Defense
Department of Education
Department of Health
Department of Health, Office of Environmental Quality Control
Department of Health, Environmental Planning Office
Department of Health, Environmental Management Division
Department of Health, Clean Water Branch
Department of Health, Wastewater Branch
Department of Land and Natural Resources
Department of Land and Natural Resources, Land Division
Department of Land and Natural Resources, Land Division, Kaua'i District
Department of Land and Natural Resources, Division of Forestry and
Wildlife

State of Hawai'i (continued)

Department of Land and Natural Resources, Division of Forestry and
Wildlife, Kaua'i District
Department of Land and Natural Resources, Historic Preservation
Division
Department of Transportation
Office of Hawaiian Affairs
University of Hawai'i at Mānoa, Environmental Center
University of Hawai'i Community Colleges, Kaua'i Community College

County of Kaua'i

Planning Department
Department of Public Works, Engineering Division
Department of Public Works, Building Division
Department of Public Works, Division of Solid Waste Management
Department of Public Works, Wastewater Management Division
Department of Water
Department of Parks and Recreation
Transportation Agency
Civil Defense Agency
Office of Economic Development
Police Department
Fire Department

Utilities

Kaua'i Island Utility Cooperative
Hawaiian Telcom
Oceanic Time Warner Cable

**Agencies Consulted
In Draft EA
Process:**

Federal

U.S. Army Corps of Engineers, Civil Works Technical Branch
U.S. Army Corps of Engineers, Regulatory Branch
U.S. Geological Survey
U.S. Fish and Wildlife Service
U.S. Department of Agriculture, Natural Resources Conservation Service

State of Hawai'i

Department of Agriculture
Department of Accounting and General Services
Department of Business, Economic Development and Tourism
Department of Business, Economic Development and Tourism, Land Use
Commission
Department of Business, Economic Development and Tourism, Office of
Planning
Department of Defense
Department of Education

State of Hawai'i (continued)

Department of Health
Department of Health, Office of Environmental Quality Control
Department of Health, Environmental Planning Office
Department of Health, Environmental Management Division
Department of Health, Clean Water Branch
Department of Health, Wastewater Branch
Department of Land and Natural Resources
Department of Land and Natural Resources, Land Division
Department of Land and Natural Resources, Land Division, Kaua'i District
Department of Land and Natural Resources, Division of Forestry and
Wildlife
Department of Land and Natural Resources, Division of Forestry and
Wildlife, Kaua'i District
Department of Land and Natural Resources, Historic Preservation
Division
Department of Transportation
Department of Transportation, Highways Division, Kaua'i District
Office of Hawaiian Affairs
University of Hawai'i at Mānoa, Environmental Center
University of Hawai'i Community Colleges, Kaua'i Community College

County of Kaua'i

Honorable Mayor Bernard P. Carvalho, Jr.
Office of the County Clerk
Council Chair Jay Furfaro
Council Vice Chair JoAnn Yukimura
Councilmember Nadine Nakamura
Councilmember Tim Bynum
Councilmember Dickie Chang
Councilmember KipuKai Kualii
Councilmember Mel Rapozo
Planning Department
Department of Public Works, Engineering Division
Department of Public Works, Building Division
Department of Public Works, Division of Solid Waste Management
Department of Public Works, Wastewater Management Division
Department of Water
Department of Parks and Recreation
Transportation Agency
Civil Defense Agency
Office of Economic Development
Police Department
Fire Department

Utilities

Kaua'i Island Utility Cooperative

Hawaiian Telcom

Oceanic Time Warner Cable

Others

Hawai'i State Library

Kaua'i Community College Library

Līhu'e Public Library

1. INTRODUCTION

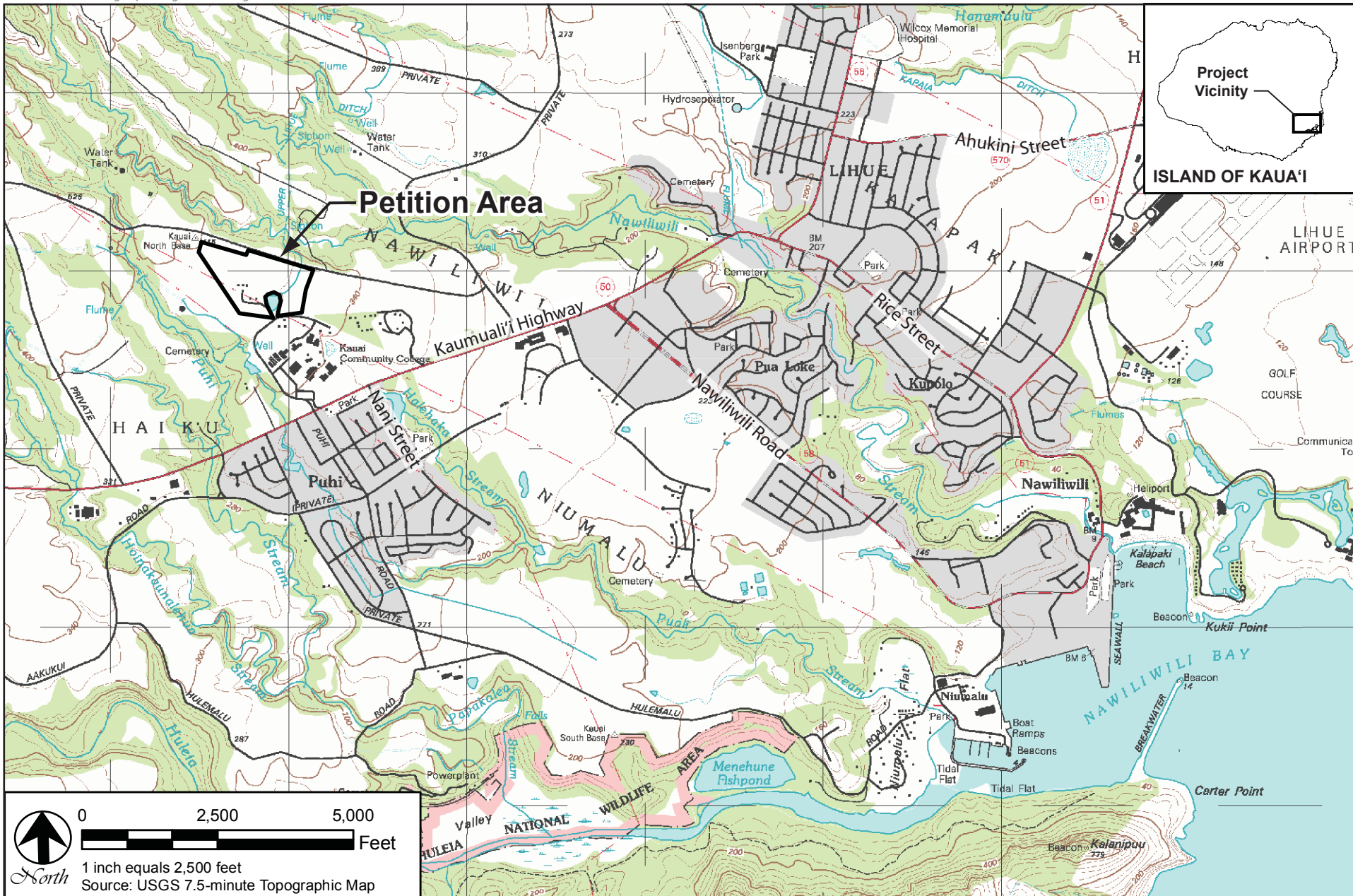
1.1 Introduction

Island School, Petitioner, is proposing an update of its master plan to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. The Island School campus, encompassing 38.448 acres (Petition Area), is located in Puhi, approximately two miles west of Līhu'e town, on the Island of Kaua'i (see Figure 1-1).

The Petitioner is seeking to amend the County of Kaua'i (County) General Plan Land Use Map for the Petition Area from the Agriculture designation to the Urban Center designation, and then reclassify the Petition Area from the State Agricultural District to the State Urban District. The County zoning designations for the Petition Area are Agriculture District (A) and Open District (O). The reclassification of the Petition Area will allow the improvements in the proposed updated Island School master plan to be implemented without a State Special Permit. Reclassification of the Petition Area to the State Urban District would convey land use jurisdiction to the County, which would regulate uses through its Comprehensive Zoning Ordinance (CZO). Preparation of this Environmental Assessment (EA) is required pursuant to Chapter 343, Hawai'i Revised Statutes (HRS) since the proposed project involves a County General Plan Amendment. As the Petitioner will pursue the County General Plan Amendment prior to petitioning for the State Land Use District Boundary Amendment, the County Planning Department is the Approving Agency for the EA. The Petition for General Plan Amendment has been filed with and is being concurrently processed by the Planning Department.

The need to amend the Petition Area from the County General Plan Agriculture designation to the Urban Center designation, and to reclassify from the State Agricultural District to the Urban District, is to be more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaunualii Highway. It is noted that the University of Hawai'i Community Colleges (UHCC) is currently proposing to reclassify approximately 153 acres of the Kaua'i Community College campus, located adjacent to and southwest/south of the Petition Area, from the State Agricultural District to the Urban District. The Kaua'i Community College campus is, in turn, contiguous with existing Urban District lands to the south. Development of the Kaua'i Community College campus was previously permitted through a Special Permit granted by the State Land Use Commission (SLUC). However, Kaua'i Community College was subsequently apprised by the County Planning Department that future expansion of the campus will not be permitted through another Special Permit.

The respective Petitions for State Land Use District Boundary Amendment for Island School and the Kaua'i Community College campus are planned to be filed concurrently with the SLUC by April 2013. With the proposed reclassification of the Kaua'i Community College campus to the State Urban District, further expansion of the Urban District into the Petition Area would be logical, and will not contribute toward scattered or spot urban development.



Island School Updated Master Plan

LOCATION MAP

FIGURE

1-1

1.2 Project Location

The Petition Area is located adjacent to and north/northeast of the University of Hawai'i's Kaua'i Community College campus and approximately two miles west of Līhu'e town in Puhi, Līhu'e District, Island of Kaua'i. The Petition Area encompasses 38.448 acres owned by Island School, and is identified as Tax Map Key (TMK): (4) 3-8-002: 016 (see Figure 1-2).

1.3 Background

Island School was founded in 1977 by a group of Kaua'i parents and teachers concerned with providing quality education for Kaua'i's children. It is Kaua'i's largest private, non-sectarian, independent school accommodating Grades Pre-Kindergarten (Pre-K) through 12, and has a current enrollment of approximately 370 students. Island School is structured as a Hawai'i non-profit corporation, relies on tuition, grants and donations for its operating fund, and obtains no funds from governmental sources. It is governed by a Board of Directors consisting of up to 22 members.

Island School was originally located in Keālia on the east side of Kaua'i, in the old Keālia Camp Store Building on property leased from Līhu'e Plantation Company., Ltd. Initially, Island School primarily accommodated students in Grades K through 8. Between 1977 and 1990, the enrollment at Island School increased from 25 to 120 students, thereby reaching its maximum capacity at that location.

In 1991, Island School relocated from Keālia to its current Puhi location on a 10-acre site adjacent to and mauka of the Kaua'i Community College campus. The new site allowed for development of a larger school facility to meet the increased demand in student enrollment. The 10-acre site, designated in the State Agricultural District and County zoned Agriculture District (A), was deeded to Island School by the Līhu'e Plantation Company, Ltd. The relocation of Island School to the Puhi site and construction of new campus facilities were approved by the County Planning Commission on August 23, 1990 through a Special Permit, Use Permit, Variance Permit, and Class IV Zoning Permit. The school's master plan included development of the campus in two phases containing classroom facilities, administrative offices, athletic field/playground, library, cafeteria, off-street parking, and additional classroom facilities to accommodate future student enrollment projections. The Phase 1 improvements maintained Grades K through 8 with a projected enrollment of approximately 180 students and 20 faculty and staff. The facility improvements in Phase 1 included the relocation of five structures to the site, including two classroom buildings for Grades 6, 7 and 8, a groundskeeper/security house, an administration/library building, and a cafetorium; and construction of three new classroom structures. The Phase 2 improvements included staff housing, a sports center, a theater, additional classrooms, and support facilities, and were to be undertaken upon availability of funding.

On April 13, 1995, the County Planning Commission approved a revised master plan for Island School for construction of a multi-purpose building to be used as an enrichment center for art, music, and physical education under the existing land use permits.

On August 22, 1996, the County Planning Commission approved a Special Permit, Use Permit and Class IV Zoning Permit for the addition of a Grade 9 class to Island School to be housed in three existing portable classrooms. Enrollment of the Grade 9 class was projected to be a maximum of 30 students and approximately five associated staff.

On August 14, 1997, the County Planning Commission approved a Special Permit, Use Permit and Class IV Zoning Permit for the addition of Grades 10, 11 and 12 to Island School, and construction of a new classroom building, multi-purpose athletic court, and additional parking. This approval allowed for the establishment of a full high school consisting of Grades 9 through 12, in addition to the existing Grades K through 8 lower school. Each high school grade was projected to consist of a maximum of 30 students, with approximately 12 full-time equivalent (FTE) associated faculty and staff at the high school.

In September 1998, Island School requested a Variance Permit and Class IV Zoning Permit for the acquisition of an additional 20 acres of adjacent land to the north and east for expansion of its campus. The 20-acre site is designated State Agricultural District and is County zoned Agriculture District (A) and Open District (O). The permit request was to subdivide the 20-acre site from the larger contiguous parcel owned by Līhu'e Plantation Company, Ltd., and consolidate it with the existing 10-acre site to create a 30-acre campus. The intent of the land acquisition was to accommodate future expansion of the campus resulting from enrollment increases. The 20 acres were to allow for development of additional structures and expansion of athletic and playing fields. On November 12, 1998, the County Planning Commission approved the Variance Permit and Class IV Zoning Permit to deviate from the "one-time" subdivision limitation for parcels within the Agriculture District (A).

On January 19, 2001, the County Planning Department approved a Class I Zoning Permit for the installation of one ready-built wooden structure with a new building foundation for use as a classroom. This classroom building was part of the approved master plan for the Island School campus.

On April 26, 2005, the County Planning Commission approved a Special Permit, Use Permit and Class IV Zoning Permit to acknowledge the revised master plan of Island School and allow construction of the Phase I improvements. The revised master plan included the following:

Phase I Improvements:

- A sports complex consisting of: 1) a 14,000 square-foot gymnasium with a regulation basketball court or two regulation volleyball courts; 2) a locker facility of approximately 4,800 square feet, including boys and girls lockers and showers/toilet, instructor's office/shower, laundry/janitorial, trainer's room, physical education (P.E.) education/meeting room, and weight room; and, 3) deferred construction of an eight-lane, 25 meter (m) outdoor swimming pool.
- A Hawaiian cultural pavilion of approximately 1,700 square feet.

Future Phase Improvements:

- Additional classrooms
- New library/learning center
- Cafeteria with student lounge
- Performing arts building

The Phase I improvements were intended to expand the participation of the existing student body enrollment of approximately 325 students in athletic and Hawaiian cultural activities. The future phase improvements were intended for the contemplated expansion of the student body enrollment to approximately 500 students, and were projected over a ten- to 15-year period.

In 2006, an additional 8.448 acres of adjoining land to the north and east was acquired through a beneficial gift from Grove Farm Company, Inc., and added to the Island School campus by boundary adjustment. This increased the total acreage of the Island School campus to 38.448 acres. The 8.448-acre area is designated State Agricultural District and is County zoned Agriculture District (A) and Open District (O).

In February 2010, the County Planning Department approved the constructing of a science building instead of the locker room/weight room and 25m swimming pool which were deferred to a later development timeline. The planned two-story science building, consisting of approximately 14,000 square feet of total floor area, was located within the original 10-acre master plan, and within the Phase I area of the revised master plan.

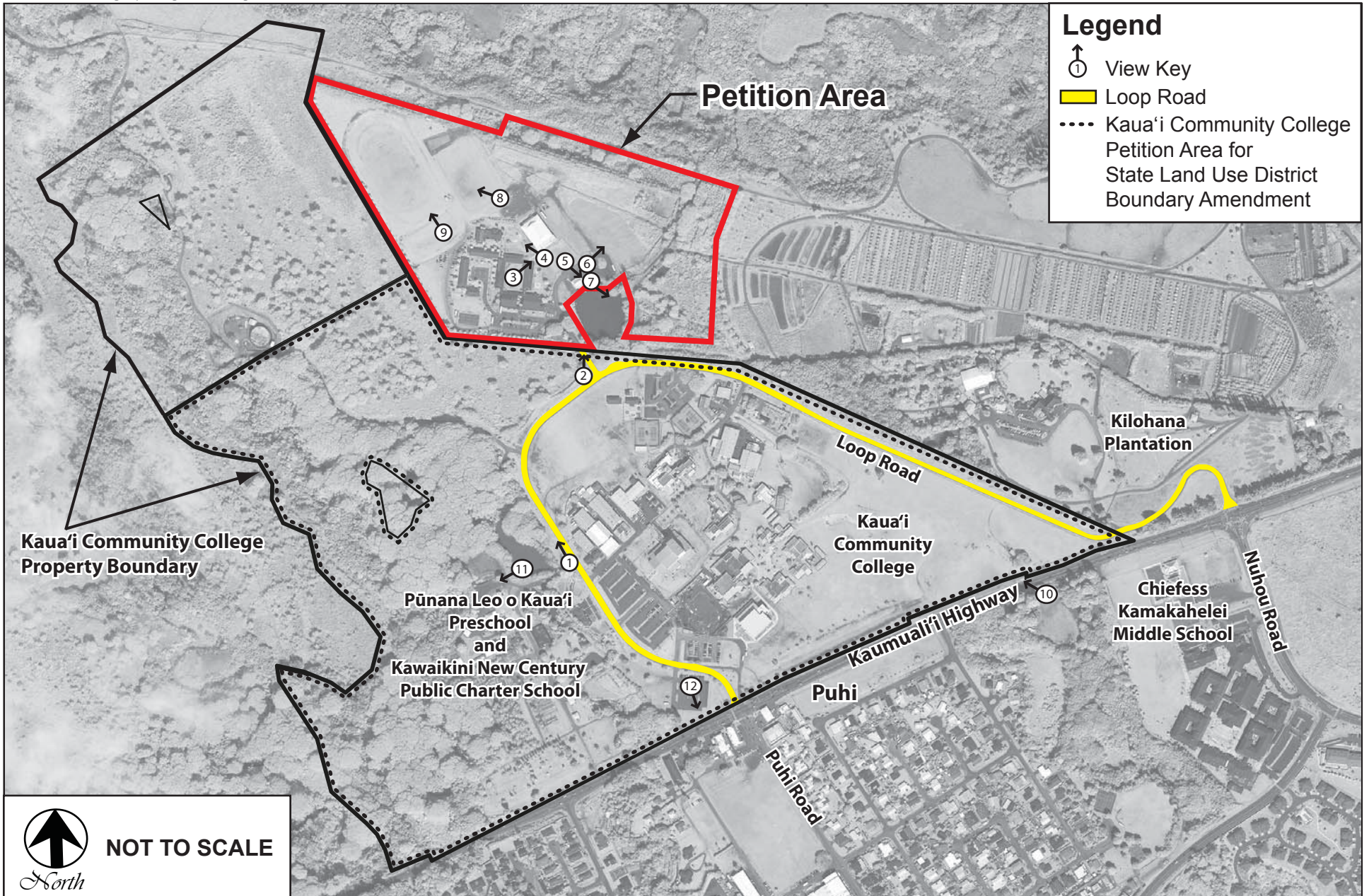
In July 2012, the County issued a building permit for the construction of a 200 kilowatt (kW) solar photovoltaic facility on an approximately one-acre site within the northeast portion of the Petition Area. Construction of the solar photovoltaic facility was completed in November 2012, and is currently operational. The solar photovoltaic facility includes more than 1,200 solar panels that will generate clean, renewable solar energy to meet the daytime needs of the Island School campus.

1.4 Existing and Surrounding Uses

Existing Uses: The Petition Area was previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area of approximately 30 acres encompassing the western and central portions of the site, has been developed as the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; school parking; and, road access. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. Photos of the Petition Area shown in Figures 1-3a, 1-3b, and 1-3c are located on Figure 1-3.

Surrounding Uses: Land uses bordering the Petition Area include the University of Hawai'i's Kaua'i Community College campus to the southwest/south; a reservoir to the south; undeveloped, vegetated lands owned by Grove Farm Company, Inc. to the north; and, an agro-tourism venture operated by Kaua'i Kilohana Partners, dba Kilohana Plantation, to the east on property owned by Grove Farm Company, Inc. Photos of the surrounding areas shown in Figures 1-3a, 1-3b, and 1-3c are located on Figure 1-3.

Other surrounding land uses in the nearby vicinity include Kilohana Plantation to the southeast; Kaumuali'i Highway to the south; two Hawaiian Language Immersion schools, including Punana Leo o Kaua'i Preschool and Kawaikini New Century Public Charter School, located to the south within the Kaua'i Community College property; a water storage tank located to the southwest; and, undeveloped, vegetated lands owned by Grove Farm Company, Inc. to the west, north and east.



Legend

- ① View Key
- Loop Road
- Kaua'i Community College Petition Area for State Land Use District Boundary Amendment



NOT TO SCALE

North

Island School Updated Master Plan

PHOTO KEY MAP

FIGURE

1-3



Photo 1: Access road to Island School along the western boundary of Kaua'i Community College campus.



Photo 2: Entrance to Island School from access road.



Photo 3: Island School classroom building. Samuel W. & Edith K. Wilcox Gymnasium in the background.



Photo 4: Classroom buildings and gymnasium looking west from the "Piko" of the Island School campus.

Island School Updated Master Plan

PROJECT SITE PHOTOS

FIGURE

1-3a



Photo 5: Culture and Arts building within the south-central portion of the Island School campus.



Photo 6: Eastern portion of Island School campus looking northeast.



Photo 7: Reservoir adjacent to south-central portion of Petition Area looking east. Southeast portion of Petition Area in the background.



Photo 8: Recreational field within northwestern portion of Island School campus looking northwest.

Island School Updated Master Plan

PROJECT SITE PHOTOS

FIGURE

1-3b



Photo 9: Outdoor science area within western portion of Island School campus.



Photo 10: Kaua'i Community College campus from Kaumuali'i Highway looking northwest.



Photo 11: Kawaikini New Century Public Charter School (left) and Pūnana Leo o Kaua'i Preschool (right) within southwest portion of Kaua'i Community College property.



Photo 12: Retail/commercial establishments along Kaumuali'i Highway from access road within Kaua'i Community College campus.

Island School Updated Master Plan

PROJECT SITE PHOTOS

FIGURE

1-3c

Further to the south of the Petition Area and Kaumuali'i Highway, land uses include Kukui Grove Center and the Kukui Grove Village West commercial area consisting of Costco, Home Depot, and various other retail and commercial establishments; Chiefess Kamakahelei Middle School; Puakea Golf Course; residential subdivisions; the County's Puhi Park and Puhi Subdivision Park; Puhi Industrial Park; Kaua'i Nursery & Landscaping; and, various retail and commercial establishments.

(This page is intentionally left blank)

2. PROJECT DESCRIPTION

2.1 Project Need

The need for the updated Island School master plan is to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students projected over a ten-year period. This master plan updates the current campus master plan approved through a Special Permit, Use Permit and Class IV Zoning Permit by the County Planning Commission on April 26, 2005.

2.2 Project Description

Island School is proposing an update of its master plan to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. An increase of approximately 22 FTE faculty and staff, to the current 62 FTE members, for a total of 84 FTE members, will be required for the future increase in student enrollment. The proposed master plan for the 38.448-acre campus updates the current master plan approved through a Special Permit, Use Permit and Class IV Zoning Permit by the County Planning Commission on April 26, 2005.

The proposed updated master plan includes new, renovated and expanded classroom buildings; expanded administration facility and visual arts facility; new facilities, including science building, campus center, dining facility, auditorium and stage, arts education building, back-of-house building and courtyard, robotics shed, outdoor science area, maintenance facility, and informal gathering areas; playground and sports facilities, including physical education (P.E.) facilities, track and football field, soccer field, baseball field, softball field, and outdoor swimming pool; internal loop road with bus parking spaces; school and community drop-off areas; and, additional parking spaces. The Conceptual Master Site Plan for Island School is depicted in Figure 2-1.

Existing vehicular and pedestrian access to the Island School campus is from Kaumuali'i Highway via a paved, two-way loop road from the intersection at Puhi Road, traversing along the perimeter of the developed portion of the Kaua'i Community College campus, and continuing within the southern portion of the adjoining eastern parcel owned by Wilcox Family Limited Partnership, to the intersection at Nuhou Road (see Figure 1-3). From the top of the loop road, an entry road extends mauka into the Island School campus. Use of the portion of the access road, and the entry road to the Island School campus, located within the Kaua'i Community College campus is via an unrecorded Grant of Easement from the University of Hawai'i to Island School dated June 20, 2009, effective as of July 3, 2007, for a term of 30 years. Use of the remaining portion of the access road located within the Wilcox Family Limited Partnership parcel is via a recorded Grant of Easement from the Gaylord & Carol Wilcox Family Limited Partnership to Island School and the University of Hawai'i dated July 3, 2007, for a term of 30 years.



MASTER SITE PLAN

The Island School

FLANSBURGH ARCHITECTS

SCALE: NTS

10/31/2012

Island School Updated Master Plan

CONCEPTUAL MASTER SITE PLAN

FIGURE

2-1

2.3 Sustainable Strategies

The project proposes to incorporate Leadership in Energy and Environmental Design (LEED) standards and strategies, to the extent deemed economically feasible, to achieve sustainable site, utilities and building development. The following are green principles and strategies that are ongoing, or may be created for the proposed project:

Sustainable Sites:

- Control storm water runoff by capturing and retaining runoff on-site.
- Develop erosion and sedimentation control measures meeting the construction activity pollution prevention criteria. This would include reducing pollution from construction activities by controlling soil erosion, waterway sedimentation, and airborne dust generation.
- Minimize light pollution, and reduce the potential for interactions of nocturnally-flying seabirds, by shielding exterior lighting within the campus. Refer to Section 3.6 Fauna for additional information.

Energy and Water Efficiency:

- Reduce energy demand and consumption through the use of solar and efficient, low-consumption lighting fixtures and equipment, such as Energy Star rated appliances.
- Reduce fossil fuel energy by more than 50 percent with the current installation of a 200 kilowatt (kW) solar facility within the Petition Area to provide clean, renewable solar energy to meet the daytime needs of the campus.
- Reduce potable water consumption by utilizing non-potable water from Grove Farm Company, Inc.'s irrigation ditch system to irrigate the campus, as needed, and employing catchment systems for reuse of rain water.

Building Design:

- Design spaces for natural ventilation to take advantage of the trade winds, and use of ceiling fans.
- Utilize skylights to allow natural light to illuminate interior spaces.

Sustainable Transport:

- Reduce the use of automobiles by continuing to provide bus transportation between home and school for students residing within the North Shore and eastern areas of the Island; implementing car pooling for students and staff; and, encouraging bicycling and walking by students residing near the campus by way of sidewalks/pedestrian pathways along the existing loop road providing access to the school.

Waste Stream Diversion:

- During construction, develop a solid waste management plan to minimize disposal of construction, demolition and land clearing debris in the County's landfill.
- Utilize locally-produced materials, such as aggregate and concrete, wherever feasible and applicable.
- Continue implementation of the on-campus recycling program to reduce the amount of solid waste generated. Employ composting of greenwaste for use in the landscaped areas within the campus.

In addition to these green principles and strategies, Island School will continue the following programs and activities toward achieving sustainability education, both within the campus and in the broader community.

- Kaua'i BOTS is an Island School robotics program that allows participation by students from Kaua'i's three public high schools. Approximately 40 percent of the participants in this cooperative program are public school students, thereby promoting efficient use of resources.
- Approximately 35 organizations currently utilize facilities at Island School, 27 of which do so on a recurring basis. This sharing of facilities reduces the demand for construction of new facilities to serve these organizations.
- Island School has a cooperative program with its neighboring Kaua'i Community College. In addition to receiving committee advisory assistance, the advanced students at Island School have the opportunity to take college level courses at the college. Such sharing of resources promotes sustainability.
- Island School is helping to establish a community garden within its campus through a private grant. The plan is to allow members of the Puhi community to participate in food production and share their gardening knowledge with Island School students.

2.4 Development Schedule

The anticipated timeframes for application and approval of the County General Plan Amendment and State Land Use District Boundary Amendment are as follows:

County General Plan Amendment:

Filing of Petition	October 2012
Approval	June 2013

State Land Use District Boundary Amendment

Filing of Petition	April 2013
Approval	December 2013

Following receipt of the above boundary amendment approvals and the subsequent required entitlements approvals, build-out of the updated master plan improvements is anticipated to be completed by 2020, to the extent necessary to accommodate 500 students.

3. DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES

The following is a description of the existing environment, assessment of potential impacts and proposed measures to mitigate potential adverse impacts resulting from the development of the proposed project.

3.1 Climate

The climate of Kauaʻi, relatively moderate throughout most of the year, is characterized as semi-tropical with two seasons. The summer period from May through September is generally warm and dry, with predominantly northeast trade winds. In contrast, the winter season from October through April is associated with lower temperatures, higher rainfall, and less prevalent trade winds.

The average temperature in the Puhi area is 73 degrees Fahrenheit (F). The prevailing wind patterns are the northeasterly trade winds, which range from 10 to 15 miles per hour. The Puhi area has a mean annual precipitation of 65.8 inches, while the median annual precipitation ranges from 50 to 75 inches, with most of the rainfall occurring between October and May.

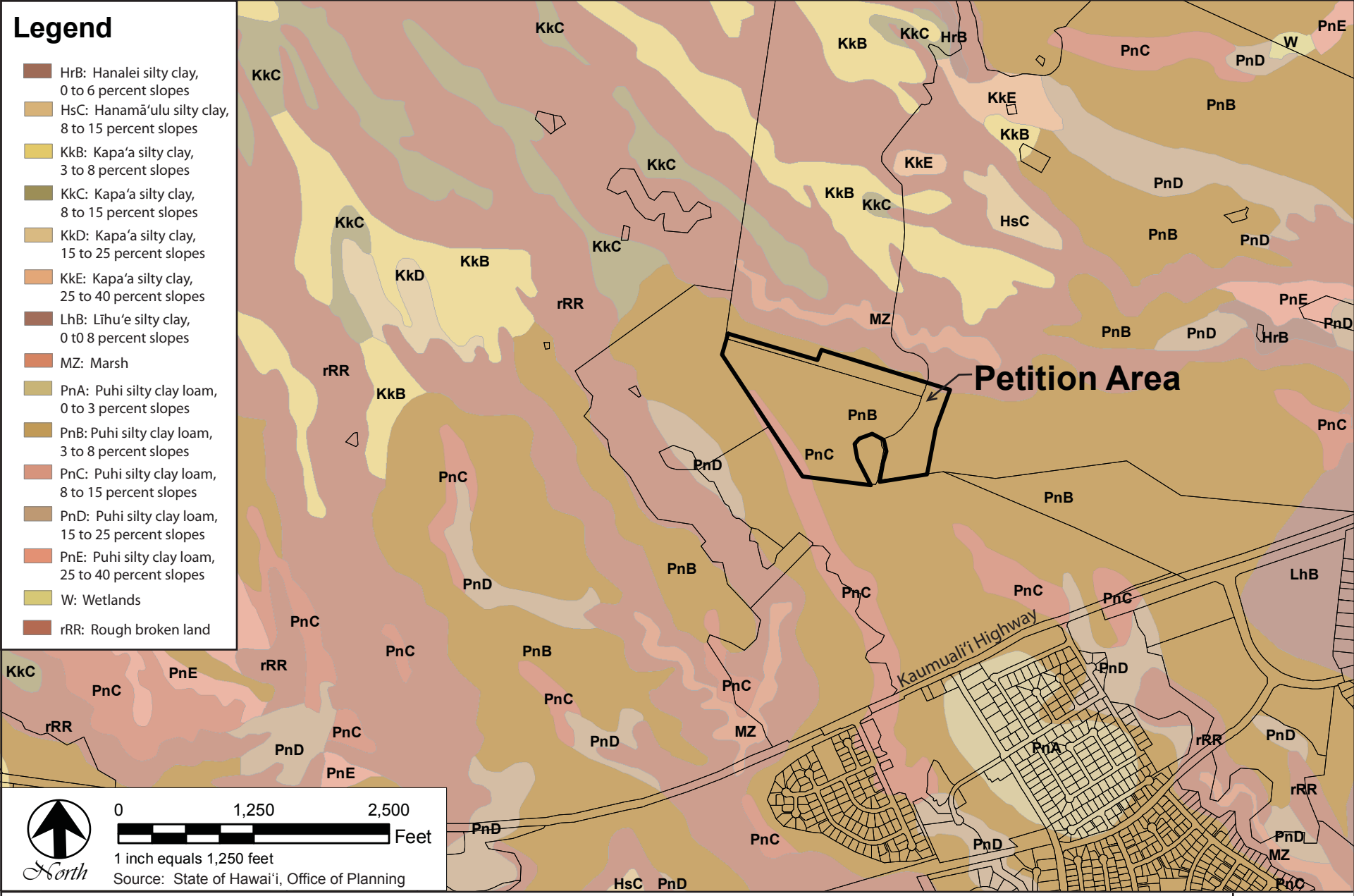
3.2 Geology, Topography and Soils

Geology and Topography: The Island of Kauaʻi is geologically one of the oldest and structurally complex islands in the State, consisting principally of a large volcano, the Kauaʻi shield, which became active approximately four million years ago. The Island's land mass was formed by two major volcanic series identified as the Waimea Canyon Volcanic Series and the Kōloa Volcanic Series. The Waimea Volcanic Series, which is more than three million years old, refers to the flows that formed the original volcanic shield and caldera of the Island. The Kōloa Volcanic Series, which is less than 1.5 million years old, refers to subsequent flows that overlaid much of the Waimea Volcanic Series formations on the lower slopes of the Island. The Kōloa Volcanic Series consists of a range of formations from olivine basalt to nepheline basalt. These rocks are much less permeable than some of the rocks of the Waimea Canyon Volcanic Series as they were deposited as nearly flat layers that tend to be massive and devoid of permeability elements.

The regional geology consists of the Kōloa Volcanic Series overlying the Waimea Canyon Series. The Kōloa Volcanic Series thickens toward the south coast of the Island, and the composition ranges from alkalic olivine basalt through basanites to nephelinites and melilite nephelinites.

The topography of the Petition Area is gently sloping at approximately 3 percent, ranging in elevation from approximately 400 feet above mean sea level (msl) at the northwestern portion to about 350 feet above msl at the eastern portion.

Soils: The U.S. Department of Agriculture Natural Resources Conservation Service classifies the soils within the Petition Area as the Puhi series and rough broken land (see Figure 3-1).



SOILS MAP

FIGURE

3-1

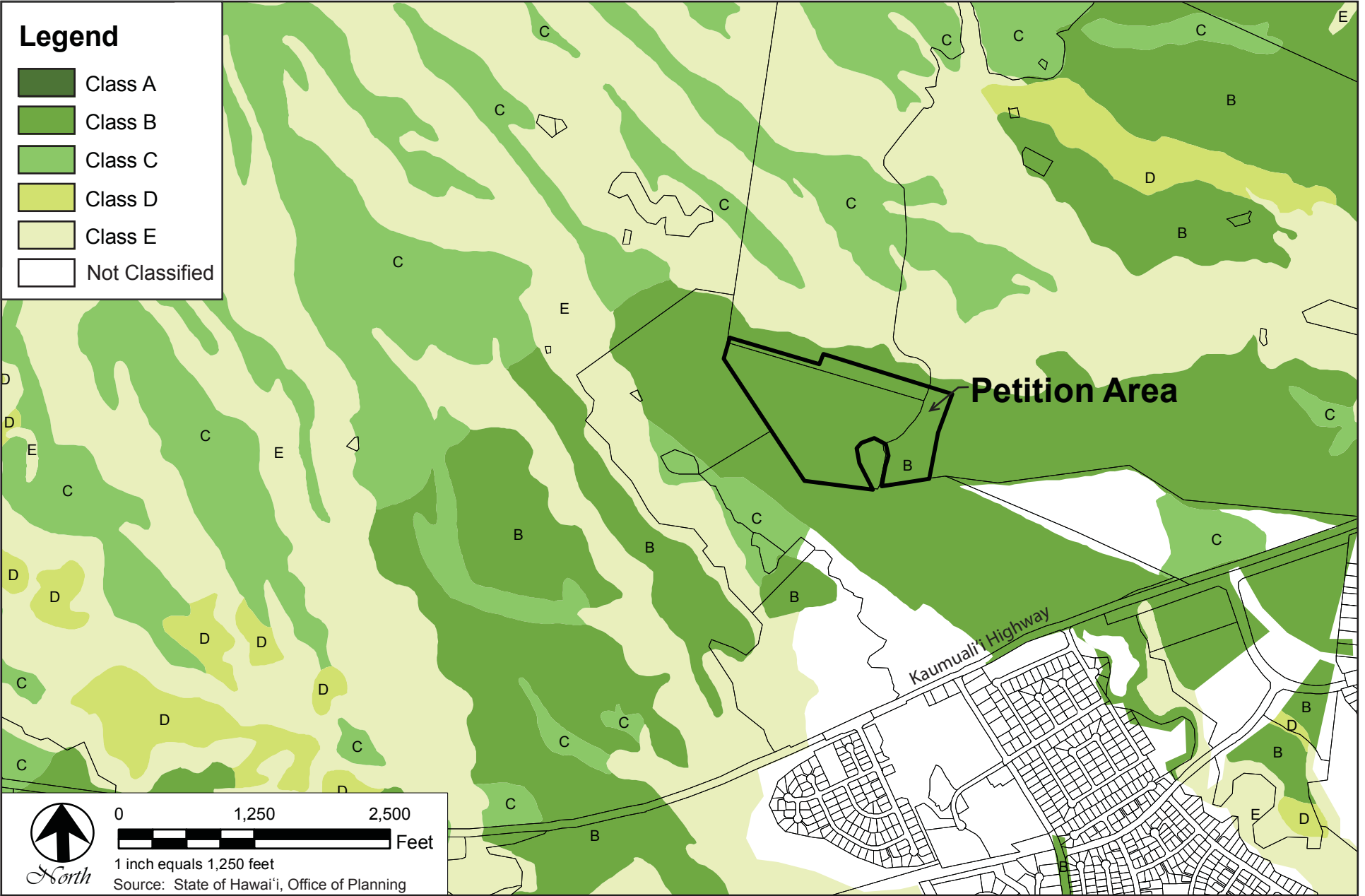
The predominant soil type within the Petition Area is classified as Puhi silty clay loam, 3 to 8 percent slopes (PnB), with a sliver along the southwestern boundary classified as Puhi silty clay loam, 8 to 15 percent slopes (PnC). This soil type is well-drained, developed in material derived from basic igneous rock, and occurs on broad interfluves on the uplands. The representative profile of the surface layer is brown silty clay loam, about 12 inches thick. The subsoil, about 48 inches thick, is reddish-brown and dark reddish brown silty clay loam and silty clay that has subangular blocky structure. The substratum is silty clay. Runoff is slow and erosion hazard is slight.

A sliver within the northeastern portion of the Petition Area is classified as rough broken land (rRR). This soil type consists of very steep land broken by numerous intermittent drainage channels. It occurs in gulches and on mountainsides, and in most places it is not stony. These soils are variable, and are 20 to more than 60 inches deep over soft, weathered rock. In most places, some weathered rock fragments are mixed with the soil material. Small areas of rock outcrop, stones, and soil slips are common. Runoff is rapid, and geologic erosion is active.

The *Detailed Land Classification – Island of Kaua‘i* published by the University of Hawai‘i Land Study Bureau (LSB) evaluates the quality or productive capacity of certain lands on the Island for selected crops and overall suitability in agricultural use. A five-class productivity rating system was established, with “A” representing the class of highest productivity and “E” the lowest. The Petition Area is classified as “B” rated soils which are considered to have good attributes for agricultural productivity (see Figure 3-2).

The State Department of Agriculture’s *Agricultural Lands of Importance in the State of Hawai‘i* (ALISH) established a classification system for identification of agriculturally important lands. Three classes of lands were established for the State, primarily, but not exclusively, on the basis of soil characteristics. The three classes of ALISH lands are Prime Agricultural Land, Unique Agricultural Land, and Other Important Agricultural Land. Lands not included under this system are “unclassified”. The majority of the Petition Area is classified as Prime Agricultural Land, except for slivers of land within the northeast and southern portions which are unclassified (see Figure 3-3).

The County Planning Department, in coordination with the University of Hawai‘i Department of Urban and Regional Planning and University of Hawai‘i Economic Research Organization, is currently conducting the Kaua‘i Important Agricultural Lands (IAL) Study, a community-based effort to identify and designate a working base of Kaua‘i’s agricultural lands as IAL. As part of a Statewide initiative, the purpose of designating IAL is to “conserve and protect agricultural lands, promote diversified agriculture, increase agricultural self-sufficiency and assure the availability of agriculturally suitable lands” in fulfillment of the voter-mandated 1978 amendment to the Hawai‘i State Constitution. The recommendations from the IAL study will be considered by the State Land Use Commission and the State Department of Agriculture in the continued implementation of IAL legislation. According to the methodology and findings of the IAL study (County of Kaua‘i Important Agricultural Lands Study – Second Draft, August 2011), the eight criteria used to identify IAL include: land currently in agriculture, soil quality, identified by agricultural productivity rating systems, traditional native Hawaiian uses, sufficient water, consistent with County plans, contribute to critical land mass, and proximity to support infrastructure. The results of the study will include maps of recommended IAL for the County, along with supporting data and analysis. All lands considered for IAL in this study are currently

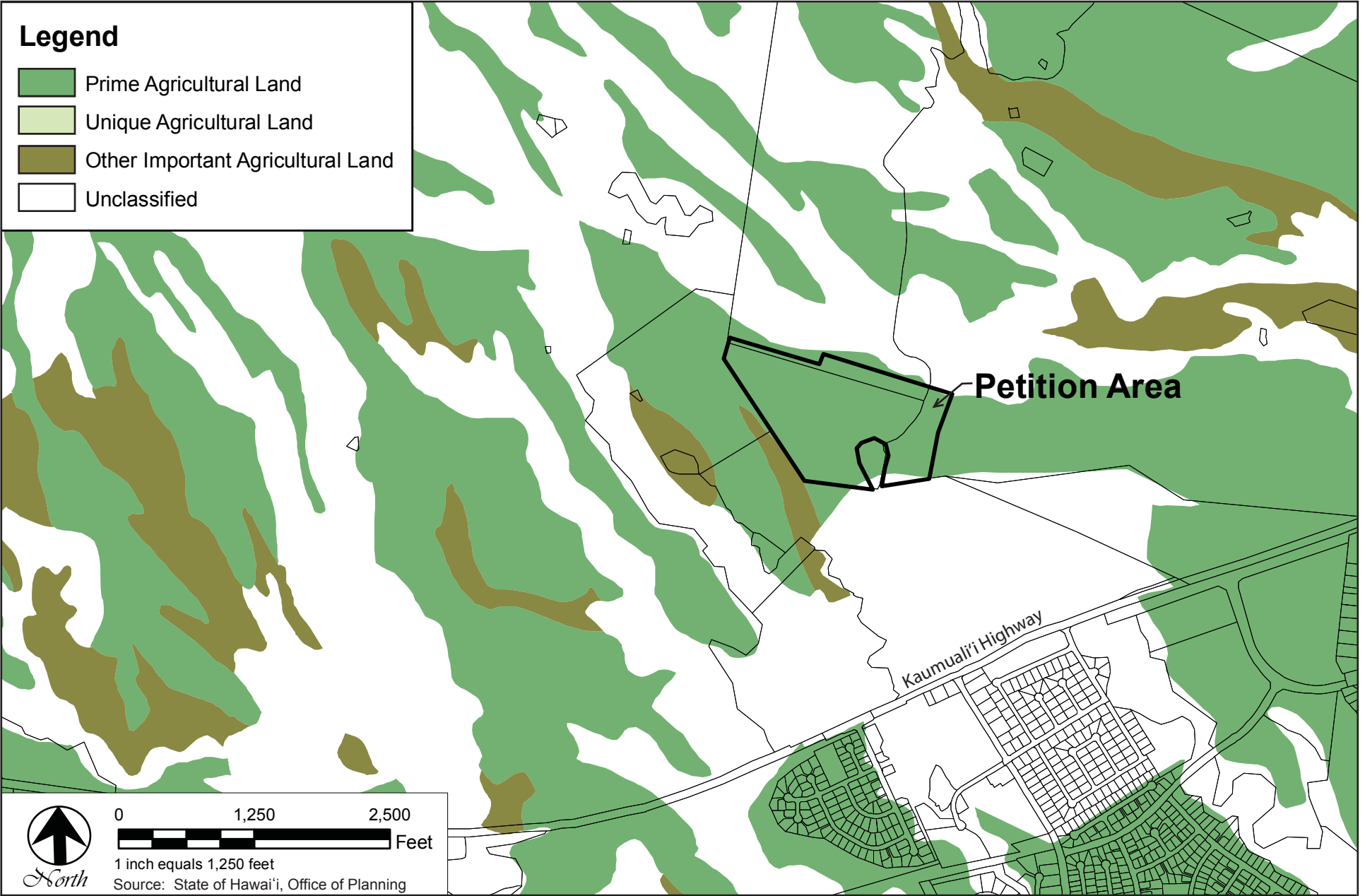


Island School Updated Master Plan

UNIVERSITY OF HAWAI'I LAND STUDY BUREAU MAP

FIGURE

3-2



Island School Updated Master Plan

AGRICULTURAL LANDS OF IMPORTANCE IN THE STATE OF HAWAI'I MAP

FIGURE

3-3

zoned for agriculture under the State Land Use District classification system or the County's Comprehensive Zoning Ordinance.

The Petition Area was previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) encompassing the western and central portions of the site, has been developed into the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and school parking and road access facilities. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. No intensive agricultural activities presently occur within the Petition Area.

Impacts and Mitigation Measures

No significant impacts to the geology, topography and soils are anticipated with the construction and development of the proposed project. Construction of the proposed project improvements will involve grading and excavation of presently undeveloped and developed areas within the Petition Area. Potential water quality impacts to surface and near shore coastal waters during construction of the project will be mitigated by adherence to State and County water quality regulations governing grading, excavation and stockpiling. A National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction Activity, as administered by the State Department of Health (DOH), will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural Best Management Practices (BMPs), such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

Following the associated construction activity, exposed soils and excavated areas will be graded, backfilled to its existing contours, built and paved over, or re-vegetated/landscaped to control erosion.

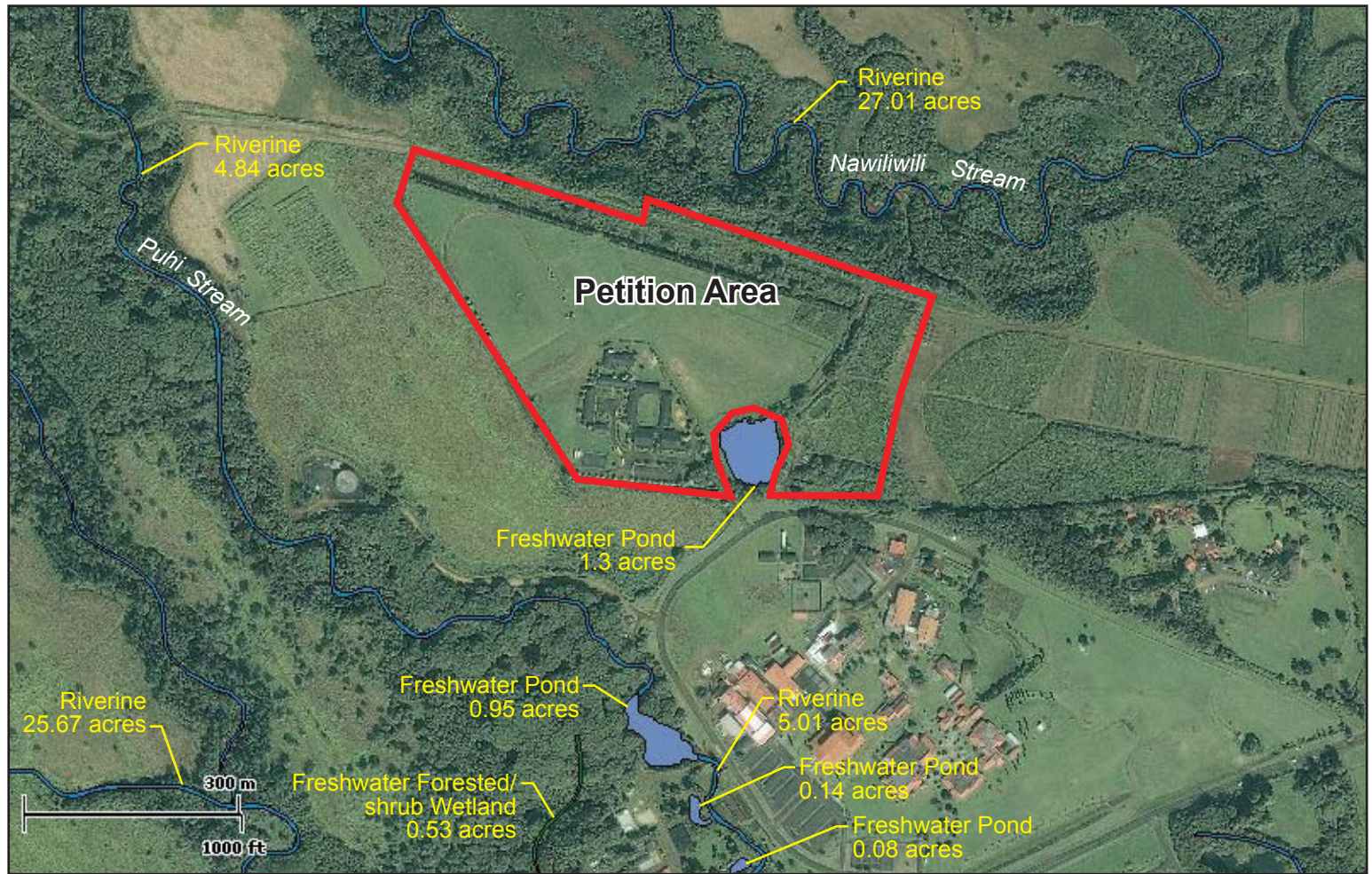
According to the County Planning Department, the final recommendations of the County of Kaua'i IAL Study have yet to be adopted, although the priority for County-led IAL designation does not include the Petition Area. The majority of the adjacent Kaua'i Community College campus does not have an IAL score since the area is designated Urban Center in the County General Plan.

The Petition Area is rendered unsuitable for intensive agricultural uses given its use as a school since 1990. Given the existing and proposed campus improvements within the Petition Area, it is highly unlikely that the land will revert to agricultural use in the future.

3.3 Hydrology

3.3.1 Surface Waters

There are no streams within the Petition Area. Surface waters in the nearby vicinity of the Petition Area are shown in Figure 3-4. Nāwiliwili Stream is the nearest perennial stream, located approximately 300 feet north of the Petition Area at its closest point. Nāwiliwili Stream generally flows in a northwesterly to easterly direction in the vicinity of the Petition Area, and continues in a southeasterly direction to Nāwiliwili Bay. Puhi Stream flows in a southerly



NOT TO SCALE

Source: U.S. Fish and Wildlife Service
National Wetland Inventory
May 25, 2011

Island School Updated Master Plan

SURFACE WATERS MAP

FIGURE

3-4

direction approximately 0.2 mile west of the Petition Area at its closest point. Puhi Stream converges with Hoinakaunalehu Stream south of the Petition Area, forming Papakōlea Stream. Further south, Papakōlea Stream flows through the Hulē'ia National Wildlife Area before discharging into Hulē'ia Stream, which flows east to Nāwiliwili Bay.

Portions of three plantation-era irrigation ditches, which are part of Grove Farm Company, Inc.'s (formerly Līhu'e Plantation Company, Ltd.'s) irrigation system, are located within the western, southern and eastern portions of the Petition Area (see Figure 3-5). The ditch identified as CSH 2, located along the western and southwestern boundaries of the Petition Area, collects storm runoff from the western portion of the Island School campus. This ditch is not currently used for irrigation. The ditch identified as CSH 3, located within the eastern portion of the Petition Area, is an active irrigation ditch that enters the Petition Area from the north and feeds into Grove Farm Company, Inc.'s (formerly Līhu'e Plantation Company, Ltd.'s) reservoir adjacent to the south-central boundary of the Petition Area. The ditch identified as CSH 4, located along the southeastern boundary of the Petition Area, can be fed by the adjacent reservoir. An existing plantation-era irrigation ditch located south of the Petition Area flows out of the reservoir adjacent to the south-central boundary of the Petition Area, and also collects storm runoff from the Island School campus.

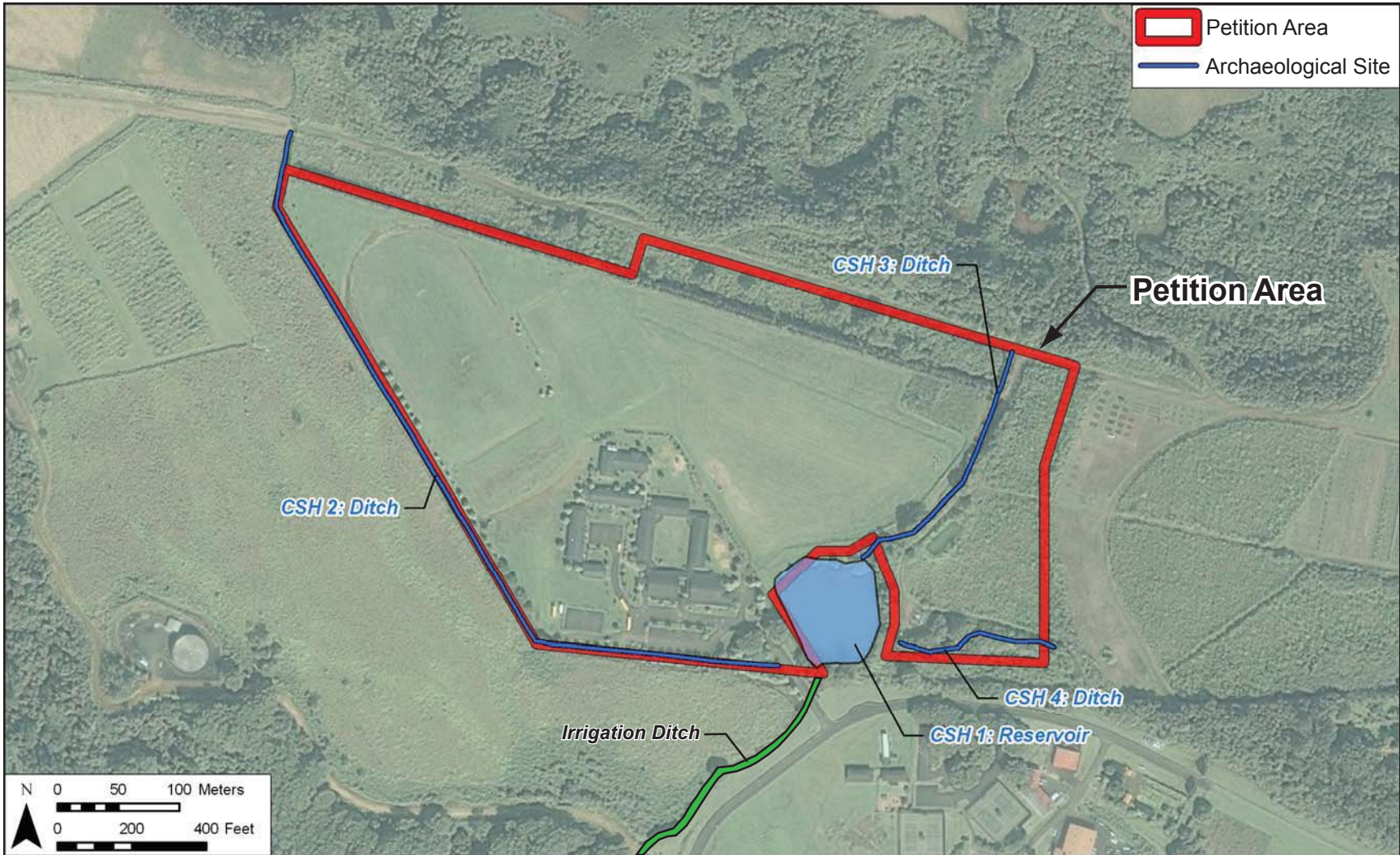
Wetlands: There are no wetlands located within the Petition Area. The existing reservoir located outside of and adjacent to the south-central boundary of the Petition Area is designated as a wetland according to the U.S. Fish and Wildlife Service (USFWS), National Wetlands Inventory as shown on Figure 3-4.

Impacts and Mitigation Measures

No significant impacts on surface waters are anticipated as a result of the construction and development of the proposed project.

Construction of the proposed project improvements will involve grading and excavation of presently undeveloped and developed areas within the Petition Area. Potential impacts to the quality of nearby surface waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, as administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins. No construction activities in conjunction with the proposed project will occur within the adjacent reservoir.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.



Source: Cultural Surveys Hawai'i, Inc., October 2010

Island School Updated Master Plan

HISTORIC SURFACE FEATURES MAP

FIGURE

3-5

3.3.2 Ground Water

Ground water occurs within portions of geologic formations called aquifers that are favorable for receiving, storing and transporting water. The Island of Kaua'i is divided into three Aquifer Sector Areas, consisting of the Līhu'e Aquifer Sector Area, comprising the eastern portion of the Island; the Hanalei Aquifer Sector Area, comprising the northern portion of the Island; and, the Waimea Aquifer Sector Area, comprising the western portion of the Island. The Petition Area is located within the Līhu'e Aquifer Sector Area. The Aquifer Sector Areas are divided into Aquifer System Areas which are defined by hydrogeological continuity, particularly hydraulic connections among units.

The Līhu'e Aquifer Sector Area is comprised of five Aquifer System Areas identified as the Kīlauea, Anahola, Wailua, Hanamaulu, and Kōloa Aquifer System Areas. The Petition Area is located within the Hanamaulu Aquifer System Area. The State Department of Land and Natural Resources (DLNR), Commission on Water Resource Management (CWRM) has adopted a sustainable yield of 36 million gallons per day (mgd) for this aquifer. The aquifer is predominantly composed of high-level aquifers perched on beds of weathered soil, ash, and dense lavas and constrained at high levels by the relatively low permeability of the aquifer. The aquifer experiences annual rainfall of 83 inches. The aquifer also consists of basal groundwater contained deep below the surface in Kōloa lava formations near the coast.

The Petition Area is not within a Ground Water Management Area as designated by DLNR CWRM. The designated Ground Water Management Areas within the State are located on the Islands of O'ahu, Maui, and Moloka'i.

Impacts and Mitigation Measures

No significant impacts on ground water are anticipated as a result of the construction and development of the proposed project. Construction and operational activities associated with the proposed project are not likely to introduce to, nor release from the soil, any materials which could adversely affect ground water sources.

3.3.3 Coastal Waters

The coastal water offshore of the Petition Area is Nāwiliwili Bay which is located approximately 2.7 miles to the southeast. The State DOH classifies this coastal water as Class A. The objective of this class is that "their use for recreational purposes and aesthetic enjoyment be protected. These waters shall not act as receiving waters for any discharge which has not received the best degree of treatment or control compatible with the criteria established for this class." (Water Quality Standards, Title 11, Chapter 54, Hawai'i Administrative Rules (HAR)).

Impacts and Mitigation Measures

No significant impacts on near shore coastal waters are anticipated as a result of the construction and development of the proposed project.

Construction of the proposed project improvements will involve grading and excavation of presently undeveloped and developed areas within the Petition Area. Potential impacts to the quality of coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with

Construction Activity, as administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

3.4 Natural Hazards

The Disaster Mitigation Act of 2000 (DMA 2000), 44 Code of Federal Regulations (CFR), Hazard Mitigation Planning, required states and counties to have approved hazard mitigation plans by November 1, 2004 to receive Pre-Disaster Mitigation funding. The development of state and local hazard mitigation plans is critical for maintaining eligibility for future Federal Emergency Management Agency (FEMA) mitigation and disaster recovery funding.

Given Hawai'i's vulnerability to natural hazards and history of disasters, the State has maintained and implemented a comprehensive, multi-hazard mitigation strategy to reduce loss of life and property damage. This strategy is embodied in the *State of Hawai'i Multi-Hazard Mitigation Plan, 2010 Update*. First adopted by Executive Order in 2004, the 2010 State of Hawai'i Multi-Hazard Mitigation Plan meets a mandatory three-year review and update of State, county and industry capabilities and plans to address natural and man-made hazards.

The County of Kaua'i's Multi-Hazard Mitigation Plan was formally approved in December 2003, and updated in 2009. The *County of Kaua'i Multi-Hazard Mitigation Plan, Update 2009*, provides an update to all sections of the County's mitigation plan, including hazard identification, asset identification, risk and vulnerability assessments, current mitigation activities and capabilities, mitigation strategy, and plan maintenance to meet requirements set forth by the DMA 2000.

Information from the respective State and County Multi-Hazard Mitigation Plans are included in this section as relevant to the Petition Area and proposed project.

3.4.1 Flood Hazard

According to the Flood Insurance Rate Map (FIRM) prepared by the FEMA, the Petition Area is designated Zone "X", "Areas determined to be outside the 0.2% annual chance floodplain" (see Figure 3-6).

The Petition Area is not within a tsunami inundation area as it is located approximately 2.7 miles inland (northwest) from the shoreline, and at elevations ranging from approximately 350 to 400 feet above msl.



Island School Updated Master Plan

FLOOD ZONE MAP

FIGURE

Impacts and Mitigation Measures

Construction and development of the proposed project are not anticipated to result in flooding of the Petition Area or lower elevation properties.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

3.4.2 Hurricanes/Strong Winds and Earthquakes

The Island of Kaua'i has experienced exceptionally strong trade wind events, winter Kona storms, and passing tropical storms and hurricanes. Hurricanes Dot (1959), Iwa (1982), and Iniki (1992) were exceptionally damaging. Hurricane Dot sustained winds of 75 miles per hour (mph), with gusts of 165 mph as it passed directly over Kaua'i. Hurricane Iwa produced winds over 125 mph. Hurricane Iniki was the strongest and most destructive hurricane to hit the Hawaiian Islands in recent history, with sustained winds at 130 mph and gusts topping 160 mph.

Earthquakes in the Hawaiian Islands are primarily associated with volcanic eruptions from the expansion or shrinkage of magma reservoirs. The Island of Kaua'i is periodically subject to episodes of seismic activity of varying intensity, but available historical data indicates that the number of major earthquakes occurring on Kaua'i have been generally low. Although it does not occur frequently, the proximity to highly seismic areas mean that there is a risk from earthquakes.

The 2006 International Building Code (IBC) provides minimum design criteria to address potential for damages due to seismic disturbances. The IBC contains six seismic zones, ranging from zero (no chance of severe ground shaking) to 4 (10% chance of severe shaking in a 50-year interval). Kaua'i is designated in Zone 1.

Impacts and Mitigation Measures

The proposed project will be designed and constructed in accordance with the relevant wind load and seismic provisions of the 2006 IBC.

3.5 Flora

A botanical survey of the Petition Area was conducted by AECOS Consultants in September 2010. The botanical survey report is included in Appendix A and is summarized below.

The Petition Area supports two basic vegetation areas: 1) landscaping around the existing school buildings, road, and other appurtenances such as the athletic field; and, 2) minimally or unmaintained areas representing proposed campus expansion areas.

In all, one mushroom, nine ferns, and 167 species of flowering plants were recorded within the Petition Area. Of those flowering plants and ferns found outside of the landscaped areas (95 species), only four are natives (4 percent) and all are indigenous to the Hawaiian Islands and relatively common in the lowlands. No endemic species were recorded, except as part of the landscaped areas.

The vegetation within the undeveloped areas of the Petition Area consists of mixed areas of moderately open to closed forest, shrubland, and grassland. Forest tends to predominate, with mostly mature macaranga (*Macaranga tanarius*) and albizia (*Falcataria moluccana*) trees. Other species include Christmas berry (*Schinus terebinthifolius*), octopus plant (*Schefflera actinophylla*), and Java plum (*Syzygium cuminii*). Groundcover and understory shrubs and vines varied considerably from area to area.

No plant species currently listed as endangered, threatened, or proposed for listing under either the Federal or State of Hawai'i endangered species programs were recorded as growing naturally within the Petition Area. Several listed species observed were ornamentals in a Hawaiian native plant garden.

Impacts and Mitigation Measures

As the Petition Area does not contain a unique botanical habitat, no significant impacts on flora are anticipated from the construction and development of the proposed project. The proposed campus expansion areas are devoid of botanical resources that would merit special concern. All species are common to lowland windward Kaua'i, nearly exclusively non-native, and not requiring or deserving of preservation within the Petition Area. Therefore, it is not expected that development of the proposed project improvements will result in deleterious impacts to any plants species currently listed as endangered, threatened, or proposed for listing under either the Federal or State of Hawai'i endangered species statutes.

Although the botanical field survey was conducted in August 2010 (dry season), the Petition Area is within a relatively wet area in the lowlands of Kaua'i. The Petition Area has been, and is further proposed to be, modified by campus improvements and activities. There is no habitat within the Petition Area that would support native or rare plants. All of the native species recorded within the Petition Area were found around the Hawaiian cultural pavilion within the south-central portion of the site where the school has re-vegetated the area with native species.

3.6 Fauna

A fauna survey of the Petition Area was conducted by Rana Biological Consulting, Inc. in September 2010. The fauna report is included in Appendix A and is summarized below.

A total of 221 individual birds of 22 species, representing 16 separate families, were recorded during the survey. Three of the species recorded, the Hawaiian Goose or Nēnē (*Branta sandvicensis*), Common Moorhen (*Galinula chloropus sandvicensis*), and Hawaiian Coot (*Fulica alai*) are all native and listed as endangered species under both Federal and State of Hawai'i endangered species statutes. The Nēnē population on Kaua'i is increasing at a fairly rapid pace, and it is likely that if this increase continues, human interactions with Nēnē will continue to rise over time on the Island. The Common Moorhen and Hawaiian Coot are relatively abundant and widespread on the Island. One other species recorded, the Pacific Golden-Plover (*Pluvialis fulva*), is an indigenous migratory shorebird species that nests in the high Arctic during the late Spring and Summer months, returning to Hawai'i and the tropical Pacific to spend the Fall and Winter months each year. Another, the Black-crowned Night-Heron (*Nycticorax nycticorax hoactli*), is an indigenous resident breeding species. The remaining 17 species recorded are all considered to be alien to the Hawaiian Islands.

Avian diversity and densities were in keeping with the highly manicured nature of the majority of the Petition Area, and its location in the lowlands of Kaua'i. Three species, the Chestnut Munia (*Lonchura atricapilla*), Zebra Dove (*Geopelia striata*), and Common Myna (*Acridotheris tristis*), accounted for slightly less than 52 percent of all birds recorded during the station counts. The most commonly recorded species was the Chestnut Munia, which accounted for slightly more than 21 percent of the total number of individual birds recorded.

Although not detected during the survey, it is probable that the Hawaiian endemic sub-species of the Short-eared Owl, or Pueo (*Asio flammeus sandwichensis*) use resources in the general project area, as they are regularly seen foraging over open fields in the low- to mid-elevation areas on the Island.

Two other species not detected during the survey, the endangered Hawaiian Petrel (*Pterodroma sandwichensis*) and the threatened endemic sub-species of the Newell's Shearwater (*Puffinus auricularis newelli*) have been recorded flying over the Petition Area between April and the end of November each year. Additionally, the Save Our Shearwaters Program has recovered both species from the general Petition Area on an annual basis over the past three decades. There are no nesting colonies or appropriate nesting habitat for either of these listed seabird species within or close to the Petition Area.

By letter dated September 14, 2012, in response to the pre-assessment consultation conducted for this Draft EA, the USFWS stated that the Band-rumped Storm Petrel (*Oceanodroma castro*), a candidate for listing, may fly over the Petition Area. In addition, the USFWS stated the federally endangered Hawaiian stilt (*Himantopus mexicanus*) and endangered Hawaiian duck (*Anas wyvilliana*) may also be present in the vicinity of the project site (letter dated December 26, 2012 in response to Draft EA, see Appendix F).

Mammalian species detected during the survey include a dead cat (*Felis c. catus*), and tracks and sign of both dog (*Canis f. familiaris*) and pig (*Sus s. scrofa*). The endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), or 'ōpe'ape'a as it is known locally, was not detected during the survey, although bats have been recorded within the general Petition Area on a regular basis. Hawaiian hoary bats are widely distributed in the lowland areas on Kaua'i, and have been documented in and around almost all areas that still have some dense vegetation.

Although no rodents were detected during the survey, it is likely that the four established alien muridae found on Kaua'i, the Roof rat (*Rattus r. rattus*), Norway rat (*Rattus norvegicus*), European house mouse (*Mus musculus domesticus*), and possibly Polynesian rat (*Rattus exulans hawaiiensis*) use various resources found within the general Petition Area. All of these introduced rodents are deleterious to native ecosystems and the native faunal species dependant on them.

No mammalian species protected or proposed for protection under either the Federal or State of Hawai'i endangered species programs were detected within the Petition Area during the survey.

There is no Federally delineated Critical Habitat present within or adjacent to the Petition Area.

Impacts and Mitigation Measures

No significant impacts on fauna within the Petition Area are anticipated from the construction and operation of the proposed project. No listed, candidate, or proposed threatened or endangered avian or mammalian species under either the Federal or State endangered species statutes will be disturbed or adversely impacted as a result of the proposed project.

The primary cause of mortality in Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels is thought to be predation by alien mammalian species at the nesting colonies. Collision with man-made structures is considered to be the second most significant cause of mortality of these seabird species in Hawai'i. Nocturnally flying seabirds, especially fledglings on their way to sea in the Summer and Fall, can become disoriented by exterior lighting. When disoriented, the seabirds often collide with man-made structures, and if they are not killed outright, the dazed or injured birds are easy targets of opportunity for feral mammals.

The principal potential impact that the proposed project improvements poses to Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels is the increased threat that birds will be downed after becoming disoriented by outdoor lighting associated with possible nighttime construction activity, and following build-out with exterior lighting associated with the structures and appurtenances that are built within the Petition Area. Should nighttime work be required in conjunction with the project construction, and during operation of the proposed project, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally-flying Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels with external lights and man-made structures.

The principal potential impacts that the proposed project improvements pose to Nēnē are during construction, and following build-out with the increased student enrollment and associated school activities. Although Nēnē on Kaua'i tend to show a remarkable disregard of human activity, fatalities have occurred on construction sites and along roads, and numerous nests have failed due to human disturbance and as a direct result of predators taking eggs and goslings.

If construction activity is planned to occur within the Petition Area during the Nēnē nesting season, which typically runs from October through March on Kaua'i, the Petition Area should be surveyed by a qualified biologist prior to the start of construction, to determine if any active Nēnē nesting activity is occurring on the site. If such nesting does occur during construction, it is recommended that a Nēnē monitor be on site during such activity to ensure that no harm occurs to the birds.

Due to the likelihood that the endangered Nēnē will utilize resources within the Petition Area, and the Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels could potentially fall onto the Petition Area during the construction phase of the project, it is recommended that an endangered species awareness program be developed to include general information on the endangered species act and protected species; specific restrictions that will be in force on the job site to protect endangered species; and protocol on who, and how job site personnel will respond to any downed or injured endangered species that may occur on the site. All construction personnel should be required to be familiar with the program, and its guidelines, restrictions and protocols to be followed.

The principal potential impact that the proposed project improvements pose to Hawaiian hoary bats is during the clearing and grubbing phases of the project. Areas of dense vegetation are likely used to some degree by roosting bats. The principal threat that clearing potential roosting habitat poses to this species is between June and September when female bats may be carrying pups and potentially may not be able to flee vegetation clearing activities quickly enough to avoid harm. Following build-out of the project, lighting associated with the school facilities, and landscaping vegetation will likely attract volant insects to the site, which in turn will provide bats with additional foraging opportunities. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation, including woody plants greater than 15 feet, along the periphery of the Petition Area should not occur between June 1 to September 15 when bats may be carrying young and potentially could be at risk by such clearing activities.

As there is no Federally delineated Critical Habitat present within or adjacent to the Petition Area, development of the proposed project improvements will not result in impacts to any Critical Habitat.

3.7 Agricultural Resources

The Petition Area was previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) encompassing the western and central portions of the site, has been developed as the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. No intensive agricultural activities presently occur within the Petition Area.

Agricultural activities currently occurring in the nearby vicinity of the Petition Area include an agro-tourism venture operated by Kaua'i Kilohana Partners, dba Kilohana Plantation, on approximately 67 acres of land leased from Grove Farm Company, Inc. located to the east of the Petition Area. This agro-tourism venture includes a train ride for visitors to observe current uses of former sugar cane land, including forestry, cattle ranching, seed corn, pineapple, papaya and various other fruit trees, and vegetable gardening.

Other undeveloped lands surrounding the Petition Area were formerly in sugar cane cultivation by the Līhu'e Plantation Company, Ltd., and currently lie fallow.

Impacts and Mitigation Measures

The proposed project will not have a significant impact on the conversion of agricultural-designated land within the Petition Area. The Petition Area is rendered unsuitable for intensive agricultural uses given its use as a school since 1990. Further, no intensive agricultural activities presently occur within the Petition Area. Given the existing and proposed campus improvements within the Petition Area, it is highly unlikely that the land will revert to agricultural use in the future.

The project will not have a significant impact on adjoining or nearby agricultural lands as the proposed updated master plan improvements will occur entirely within the Petition Area, of which the majority of the site is currently developed as the Island School campus.

3.8 Air Quality

Air quality in the vicinity of the Petition Area is generally good, with prevalent northeasterly tradewinds during most of the year. Within the nearby vicinity of the Petition Area, air quality is primarily affected by vehicular-related emissions in the form of carbon monoxide (CO) generated from traffic traveling along Kaumuali'i Highway and other nearby roadways.

Impacts and Mitigation Measures

In the short-term, there will be air quality impacts related to construction activities, including fugitive dust generated by soil disturbance, and emissions from construction vehicles and equipment and commuting construction workers. Potential air quality impacts during construction of the proposed project will be mitigated by complying with the State DOH Administrative Rules, Title 11, Chapter 60, "Air Pollution Control". The construction contractor(s) will be responsible for complying with the State DOH regulations that prohibit visible dust emissions at property boundaries. Compliance with State regulations will require adequate measures to control fugitive dust by methods such as water spraying and sprinkling of loose or exposed soil or ground surface areas and dust-generating equipment during construction. Exhaust emissions from construction vehicles are anticipated to have negligible impact on air quality in the vicinity of the Petition Area as the emissions would be relatively small and readily dissipated.

In the long-term, no significant impacts on ambient air quality are anticipated with the development of the proposed project. The ambient air quality levels would be most affected by vehicular emissions in the form of CO generated by project-related traffic, although the elevated concentrations are anticipated to be nominal and dissipate.

3.9 Noise

Ambient noise in the vicinity of the Petition Area is predominantly attributed to vehicular traffic along Kaumuali'i Highway.

Impacts and Mitigation Measures

Unavoidable short-term construction noise impacts will be mitigated to some degree by complying with the provisions of the State DOH Administrative Rules, Title 11, Chapter 46, "Community Noise Control" regulations which require a noise permit if the noise levels from construction activities are expected to exceed the allowable noise levels stated in the Rules. It shall be the contractor's responsibility to minimize noise by properly maintaining noise mufflers and other noise-attenuating equipment, and to maintain noise levels within regulatory limits. Also, the guidelines for the hours of heavy equipment operation and noise curfew times as set forth by the State DOH noise control regulations must be adhered to.

In the long-term, no significant impacts on ambient noise levels are anticipated from the development of the proposed project. Ambient noise levels in the vicinity of the Petition Area will increase slightly as a result of the associated minimal increase in vehicular traffic generated by the proposed project. Operation of the proposed project will potentially generate slightly increased noise during school hours due to additional students, faculty, and school and service-related activities.

3.10 Hazardous Materials

The Petition Area and adjoining lands were previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) encompassing the western and central portions of the site, has been developed into the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. No intensive agricultural activities presently occur within the Petition Area.

Past use of agricultural chemicals on lands previously used for commercial agricultural purposes has the potential to impact the subject property. According to Chapter 128D, Environmental Response Law, HAR, the presence of agricultural chemicals does not constitute a release of hazardous substance. Section 128D-1, HAR, excludes "any release resulting from the legal application of a pesticide product registered under the Federal Insecticide, Fungicide, and Rodenticide Act."

Impacts and Mitigation Measures

Due to its use as a school campus, the project is not anticipated to release any hazardous materials into the environment during construction and operation of the proposed improvements.

3.11 Historic and Archaeological Resources

An archaeological literature review and field inspection of the Petition Area was conducted by Cultural Surveys Hawai'i, Inc. in October 2010. The report was revised to incorporate SHPD's comments. The revised report is included in Appendix B and is summarized below.

The Petition Area is within the Nāwiliwili Ahupuaa, located in the ancient *moku*, or district of Puna. According to traditional accounts, the coastal area (located approximately 2.8 miles southeast of the Petition Area) contained a majority of the population of the ahupuaa of Nāwiliwili, due to the concentration of lo'i within the vicinity of the coast, and the availability of aquatic resources.

Within a few years following the establishment of the missionary and business activities at Kōloa in the mid 1830s, western homesteading and commerce were established on the lands above Nāwiliwili Bay that would evolve into Līhu'e Town. By 1830, the sandalwood trade had waned, the whaling industry was just beginning, and commercial agriculture was being established on Kaua'i.

Mahele records indicate that taro continued to be cultivated in Nāwiliwili Valley through the mid-19th century. Later in that century, much of the taro lands in Nāwiliwili were converted to rice cultivation. Due to the availability of large tracts of land for sale during the Mahele, in 1849, Līhu'e Plantation Company, Ltd. was established on the site chosen by Kaikio'ewa, which became the start of Līhu'e town. Līhu'e Plantation Company, Ltd. became the most modern plantation in Hawai'i at that time, and its success allowed its continued expansion. Līhu'e Plantation Company, Ltd. remained a vibrant and successful commercial operation throughout most of the 20th century, in part because of a continued interest in technological innovation. By 1910, little development had occurred within the Petition Area and its vicinity.

Līhu‘e Plantation Company, Ltd.’s technological innovations included the 1912 installation of two 240-kilowatt generators above the sugar cane fields on the slopes of Kilohana Crater. In 1919, Līhu‘e Plantation Company, Ltd. began the development of an extensive irrigation water system that eventually spanned and connected several watersheds from Hanalei to Kōloa. The first irrigation ditch, originally constructed in 1856 by William Hyde Rice, eventually metamorphosed into the Lower Līhu‘e Ditch.

A 1941 map of Līhu‘e Plantation Company, Ltd. shows the Petition Area primarily within sugar cane Field 39B and extending into Field 39A. The 1963 U.S. Geological Survey map shows a portion of the “Upper Līhu‘e Ditch” extending into the Petition Area. The ditch dates to the early 20th century. The location of the ditch corresponds with the separation between Fields 39A and 39B.

Aerial photos dated 1965 and 1977-1978 show sugar cane cultivation occurring within the Petition Area and its immediate vicinity. Līhu‘e Plantation Company, Ltd. continued commercial sugar cane cultivation in Līhu‘e until it shut down its operations in 2000.

In 1989, ten acres of the current Petition Area were donated by American Factors, Inc. (AMFAC) for the Island School campus. Pre-K through Grade 4 classrooms were constructed in 1990. Two buildings donated by Hawaiian Dredging Construction Company were reconfigured into the current administration building and main hall, and two portable classroom buildings completed the new campus that opened in September 1991. Construction of other school facilities subsequently occurred, culminating with new soccer fields and a grass track on half of a 20-acre parcel acquired in 2000 from Līhu‘e Plantation Company, Ltd.

The field inspection survey consisted of a walk-through reconnaissance of the Petition Area. A total of four historic surface features related to the Līhu‘e Plantation Company, Ltd., three of which are within the Petition Area, were observed during the survey. The surface features include a reservoir (CSH 1) located on a separate parcel adjacent to and outside of the Petition Area, and three irrigation ditches (CSH 2, CSH 3, and CSH 4), two of which (CSH 3 and CSH 4) are associated with the adjacent reservoir (CSH 1) (see Figure 3-5). All of the surface features are currently in use.

CSH 1 is a plantation-era reservoir almost completely surrounded by the south-central boundary of the Petition Area. The reservoir measures 88.5 m by 82.3 m, with a constructed berm on the east and south sides. A wooden catwalk extends 2 m from the east bank over the water. A metal mechanical device for opening and closing an underground drain pipe is located at the end of the catwalk. A formed, slotted concrete gate frame is located at the southwest side of the reservoir. Water flows from the reservoir through the gate frame to the west, to an area within the adjacent Kaua‘i Community College campus. This is the reservoir’s only outlet. A modern concrete pipe storm drain outlet from the Petition Area enters the reservoir at the northwest side. The 1963 U.S. Geological Survey map shows a portion of the “Upper Līhu‘e Ditch” that corresponds with the separation between Fields 39A and 39B, indicating CSH 1 was likely associated with the Upper Līhu‘e Ditch. The reservoir also appears on the 1910 U.S. Geological Survey map, although its associated ditches are not evident.

CSH 2 is a plantation-era irrigation ditch that forms the western, southwestern, and portion of the southern boundary of the Petition Area. The earthen ditch is 703 m long and 0.9 m deep,

with a maximum width of 2 m. The walls of the ditch are sloped, with a bottom width of 1 m. The ditch is not currently used for irrigation, but collects storm drainage and surface run-off from the Island School campus and athletic fields. A 1941 map of Līhu'e Plantation Company, Ltd. shows CSH 2 forming the western boundary of Field 39B, separating Līhu'e Plantation and Grove Farm Company, Inc.

CSH 3 is a section of an active plantation era irrigation ditch. The portion of the ditch within the Petition Area is 209 m long. The ditch enters the Petition Area from the north, near the northeastern corner. Water flowing through the ditch feeds the CSH 1 reservoir. The irrigation ditch has mounded earthen berms on each side that measure 2 m wide and range from 0.5 to 0.7 m high. The water channel is 2.5 m wide and approximately 1.2 m deep. The ditch has two concrete gate frames without gates. A 1941 map of Līhu'e Plantation Company, Ltd. shows that CSH 3 is the boundary between Fields 39A and 39B. The 1963 U.S. Geological Survey map depicts a portion of the "Upper Līhu'e Ditch" whose location corresponds with the separation between Fields 39A and 39B, indicating that CSH 3 is associated with the Upper Līhu'e Ditch.

CSH 4 is a plantation-era irrigation ditch that appears to have been fed by the CSH 1 reservoir. The portion of the ditch within the Petition Area measures 128 m long, 2.3 m wide, and 1.5 m deep. This portion of the ditch begins at a concrete culvert on the southeast side of the reservoir, and continues in a generally eastern direction until it exits the Petition Area at its eastern boundary. An abandoned valve at the end of the CSH 1 reservoir catwalk likely controlled the flow of water into the ditch. Based on its association with CSH 1, CSH 4 may also have been associated with the Upper Līhu'e Ditch.

Impacts and Mitigation Measures

The four historic features (CSH 1 to CSH 4) are plantation-era Līhu'e Plantation Company, Ltd. infrastructure. The three features within the Petition Area (CSH 2, CSH 3, and CSH 4) comprise one historic property. The features of this historic property were evaluated for significance according to the broad criteria established for the Hawai'i Register of Historic Places (see Table 1). The five criteria are:

- A - Associated with events that have made an important contribution to the broad patterns of our history;
- B - Associated with the lives of persons important in our past;
- C - Embodies the distinctive character of a type, period, or method of construction, represents the work of a master, or possesses high artistic value;
- D - Have yielded, or is likely to yield information important for research on prehistory or history; and,
- E - Have an important value to the native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out, or still carried out, at the property, or due to associations with traditional beliefs, events or oral history accounts – these associations being important to the group's history and cultural identity.

Feature	Feature Type	Function	Age	Evaluation
CSH 1	Reservoir	Water control	Plantation era	D No further work; Outside of Petition Area
CSH 2	Irrigation ditch	Water control	Plantation era	D No further work; Sufficient documentation
CSH 3	Irrigation Ditch	Water control	Plantation era	D No further work; Sufficient documentation
CSH 4	Irrigation ditch	Water control	Plantation era	D No further work; Sufficient documentation

The proposed project improvements are not anticipated to have an adverse effect on the historic features related to plantation-era infrastructure. No project improvements are proposed to be constructed within or in the immediate vicinity of the plantation-era infrastructure. While no additional work appears to be necessary, consultation with the State DLNR Historic Preservation Division (SHPD) is being conducted to determine mitigation, if any, which may be appropriate for the plantation infrastructure features that have been recommended for no further work.

The SHPD, in a letter dated September 18, 2012 in conjunction with this EA, a copy which is included in Chapter 9 Consultation, Section 9.1 Pre-Assessment Consultation of this document, indicates that although the subject property was formerly used as agricultural land, the potential exists for subsurface historic properties below the cultivation zone. As recommended by SHPD, ground disturbing activities associated with the proposed project will be monitored by a qualified archaeologist, and an archaeological monitoring plan will be prepared and submitted to the SHPD for review and approval. The monitoring plan will include information as specified in Hawai'i Administrative Rule §13-279.4.

Pursuant to SHPD's review of the archaeological literature review and field inspection report by letter dated October 26, 2012, an archaeological inventory survey of the Petition Area will be conducted in conjunction with the Petition for State Land Use District Boundary Amendment for the project. A copy of this letter is included in Appendix B.

Should any previously unidentified burial, archaeological or historic sites be found during the course of construction of the proposed project, the Petitioner will stop work in the immediate vicinity and the SHPD will be notified immediately. The significance of these finds will then be determined and appropriate mitigation measures will be approved by the SHPD and, as necessary, the Kaua'i/Ni'ihau Islands Burial Council, as appropriate. Subsequent work will proceed after SHPD authorization has been received and mitigative measures have been implemented.

3.12 Cultural Resources

A cultural impact assessment (CIA) was undertaken by Cultural Surveys Hawai'i, Inc. in April 2012 as part of the Environmental Assessment prepared in conjunction with the proposed State Land Use District Boundary reclassification of the adjacent Kaua'i Community College campus. The study area of the CIA includes the ahupuaa of Nāwiliwili, Niumalu, and Haiku within the Līhu'e District. As the Petition Area is located within the Nāwiliwili Ahupuaa, a summary of the CIA is included below. The CIA report is included in Appendix C.

The traditional moku or districts of Kaua'i were replaced in the mid- to late 19th century. Līhu'e became the modern district that includes the ahupuaa of Nāwiliwili, Niumalu, and Haiku, previously under the Puna District. Between the 1830s and the Mahele of 1848, the names Nāwiliwili and Līhu'e were used somewhat interchangeably to refer to the settlement along Nāwiliwili Bay. "Līhu'e" was not consistently used until the establishment of commercial sugar cane cultivation in the mid-19th century.

The archaeological record of early Hawaiian occupation of the study area indicates a date range of A.D. 1100 to 1650 for the pre-contact Hawaiian habitations. Excavated settlements near the mouth of Hanamaulu Stream, north of Nāwiliwili, indicate a radiocarbon date of A.D. 1170 to 1400. Historically, settlement of the study area was predominantly along the coastal areas as evidenced by the concentration of permanent house sites, temporary shelters, heiau, and fishponds in these areas.

Mo'olelo (stories, oral histories) and wahi pana (storied places) associated with the study area are plentiful, suggesting early settlement of the area by a viable Native Hawaiian population. The abundance of water and the presence of distinguished fishponds along the coast and water systems are testament to early settlement. Nāwiliwili and its vicinity had rich soils with a variety of crops like sugar cane, taro, sweet potatoes, beans, as well as groves of kukui, hau, koa, hala, and wiliwili.

After the Mahele, Victoria Kamamalu was awarded over 2,000 acres of Nāwiliwili Ahupuaa, along with much of Niumalu and Haiku. Land Commission Awards (LCAs) describe many lo'i and kula lands within the study area, particularly as being in the same apana. Many fishponds were prevalent in the study area. Alekoko Fishpond, also known as Menehune Fishpond or Niumalu Fishpond (SIHP No. 50-30-11-501), is the largest fishpond on Kaua'i and still exists in the study area.

Commercial agriculture became established on Kaua'i in the 1830s as the sandalwood trade waned. In 1835, commercial cultivation of sugar cane began at Kōloa, and plantations like Līhu'e Plantation and Grove Farm Plantation burgeoned.

Līhu'e Plantation Company, Ltd. began as a partnership in 1849 between Henry Augustus Pierce, Judge William Little Lee, and Charles R. Bishop. In 1866, the first 3,000 acres were purchased in Nāwiliwili and an additional 300 acres were purchased in Ahukini. Līhu'e Plantation Company, Ltd. was the most modern plantation in Hawaii at that time, and invested heavily in irrigation ditch infrastructure. Līhu'e Plantation Company, Ltd. remained a vibrant and successful commercial operation throughout most of the 20th century, in part because of its continued interest in technological innovation. Commercial sugar cane cultivation in Līhu'e

continued until 2000, when Līhu'e Plantation Company, Ltd. and the Kekaha Sugar Co. shut down.

Grove Farm Plantation, named after an old stand of kukui trees, was established in 1850 by Warren Goodale. In 1864, George Wilcox leased Grove Farm Plantation from subsequent owner Judge Widemann, and rapidly expanded development of the Plantation's irrigation ditch infrastructure. By 1881, lease and land purchases by George Wilcox in the Haiku Ahupuaa increased the acreage of Grove Farm Plantation nearly ten-fold.

Grove Farm Plantation was also at the forefront of housing improvements during a time when plantation housing throughout the Hawaiian Islands was inadequate. Between 1917 and 1920, Grove Farm Plantation built 120 houses in a single new camp for workers which became known as Puhi Camp. In the 1920s, Grove Farm Plantation began a new building program at Puhi, along the route of the present Kaunualii Highway and just south of the current Kaua'i Community College site. Puhi Camp also extended within the current site of the Kaua'i Community College. The plantation camp consisted of about 600 homes occupied by up to 1,200 workers and their families, and also included a movie hall, three stores, a Chinese laundry, a slaughterhouse, and an area for social events.

During the 1930s, federal funds became available to assist the Territory of Hawai'i's highway construction program. Between 1933 and 1937, construction of the Belt Road, presently Kaunualii Highway, was completed incrementally. At the same time that the Belt Road construction program was underway, during the mid-1930s, Grove Farm Plantation was further expanding into Puhi with its new headquarters.

In the early 1970s, Grove Farm Plantation donated 200 acres of former sugar cane land to the State for the Kaua'i Community College. Grove Farm Plantation ended its sugar business in 1974, setting aside lands for development and also for the continuation of sugar cultivation by leasing its Līhu'e lands to Līhu'e Plantation Company, Ltd., and its Kōloa lands to McBryde Sugar Company, Limited.

Most of the Puhi Camp housing was removed in the 1970s, prior to construction of Kaua'i Community College. The last of the homes in Puhi Camp were dismantled in the 1980s. Currently, the Punana Leo o Kaua'i Pre-School, Kawaikini New Century Public Charter School, and a few agricultural plots occupy a portion of the former Puhi Camp lands.

An archaeological reconnaissance by Palama in 1973 identified the Puhi Camp Cemetery (SIHP No. 50-30-11-B006), old plantation camp remains associated with Puhi Camp, Puhi Camp, and an area containing possible lo'i. All of these historic features are located within the current Kaua'i Community College site, except the Puhi Camp Cemetery which is in a separate parcel surrounded by the College campus. This parcel is owned by Grove Farm Company, Inc., and not by Kaua'i Community College.

To determine the potential impact of the proposed project upon native Hawaiian cultural resources, beliefs and practices, information from the archaeological literature review and field inspection of the Petition Area conducted by Cultural Surveys Hawai'i, Inc. in October 2010 (refer to Section 3.11) is provided herein.

The archaeological literature review and field inspection identified no burials, trails or archaeological sites of cultural importance in the vicinity of the Petition Area.

In the 1830s, western homesteading and commerce were established on the lands above Nāwiliwili Bay that would evolve into Līhu'e Town. In 1849, Līhu'e Plantation Company, Ltd. was established on a site which became the start of the town of Līhu'e. By 1910, however, little development had occurred within the Petition Area and its vicinity.

In 1919, Līhu'e Plantation began the development of an extensive irrigation water system that eventually spanned and connected several watersheds from Hanalei to Kōloa. A 1941 map of Līhu'e Plantation Company, Ltd. shows the Petition Area primarily within sugar cane Field 39B and extending into Field 39A. Aerial photos dated 1965 and 1977-1978 show sugar cane cultivation occurring within the Petition Area and its immediate vicinity.

Historic maps and photographs (including a 1941 Līhu'e Plantation field map and 1965 and 1977 aerial photographs) show the entire Petition Area as a sea of sugar cane. This has implications for the likelihood of traditional cultural properties and practices. Typically, Līhu'e Plantation Company, Ltd. would have been highly proprietary over their lands excluding public access. Hence, it is unlikely that there could have been access to the subject property for cultural practices from well before 1941. Perhaps more importantly, this expanse of sugar cane would appear to exclude the possibility of any traditional gathering within the Petition Area.

In 1990, construction of the Island School campus within the Petition Area commenced, with subsequent construction of additional school facilities occurring to date.

During the field inspection survey, a total of four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure were observed (see Figure 3-5). The surface features consist of a reservoir located on a separate parcel adjacent to the south-central portion of the Petition Area (CSH 1), and three irrigation ditches (CSH 2, CSH 3, and CSH 4), two of which are associated with the adjacent reservoir. All of the surface features are currently in use. Based on an evaluation for significance according to the criteria established for the Hawai'i Register of Historic Places, no additional work appears to be necessary for the four features.

Aside from the four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure, no traditional Hawaiian sites or ancient trail systems were found within the Petition Area during the field inspection survey. Based on the literature review and field inspection survey, no burials are anticipated to be found within the Petition Area.

Impacts and Mitigation Measures

The cultural impacts and recommendations of the CIA are mostly pertinent to potential impact of future development of the Kaua'i Community College on the historical remnants of the Old Puhi Camp, and the Puhi Cemetery located on a separate parcel surrounded by that site, and do not pertain to the subject Petition Area.

Based on the above findings, development of the proposed project will have minimal or no impact upon native Hawaiian cultural resources, beliefs and practices. In the event that previously unrecorded, significant historic sites are encountered during the course of

development activities within the Petition Area, further mitigation measures would be undertaken for the protection of these sites. As a precautionary measure, personnel involved in future development of the Petition Area will be informed of the possibility of inadvertent cultural finds, and made aware of the appropriate notification measures to follow, including consultation the SHPD and, as may be appropriate, with Kaua'i community cultural organizations.

3.13 Visual Resources

The Petition Area is not visible from public vantage points due to its inland location and distance from Kaumuali'i Highway, the nearest public roadway. The Petition Area is located approximately 0.4-mile mauka of Kaumuali'i Highway at its closest point, and is visually buffered by vegetation and the adjacent Kaua'i Community College campus located between the southern boundary of the site and the Highway. The visual environment of the remaining areas surrounding the Petition Area is of expansive undeveloped, vegetated lands, and agricultural cultivation.

Impacts and Mitigation Measures

No significant visual or aesthetic impacts are anticipated as a result of the proposed project. The new buildings to be constructed within the Petition Area are proposed to be mostly located within the central portion of the campus and visually will be an extension of the existing facilities. Any visual impacts of the proposed project from the surrounding areas will be minimized through appropriate architectural design criteria and compliance with the applicable development standards of the County's Comprehensive Zoning Ordinance (CZO) relative to building height, setbacks, etc. The visual environment of the northern and eastern portions of the Petition Area will mostly remain open with athletic fields and undeveloped areas. Appropriate landscaping will be provided along the southwestern and southern boundaries of the Petition Area to visually screen the campus buildings from the nearby areas.

3.14 Traffic

A Traffic Impact Report (TIR) for the proposed project was prepared by Wilson Okamoto Corporation in December 2010. The purpose of the TIR is to assess the traffic impacts resulting from the implementation of the Island School's updated master plan, and to identify recommendations of improvements, if appropriate, that would mitigate the traffic impacts. The TIR is included in Appendix D and is summarized below.

Existing Area Roadway System: Existing roadways within the vicinity of the Petition Area include Kaumuali'i Highway, Puhi Road, Nani Street, and Nuhou Street. At the time that the TIR was prepared, the ongoing widening of Kaumuali'i Highway from two to four lanes had not reached the segment fronting the Petition Area. Hence, the TIR is based on conditions at the intersections of Kaumuali'i Highway with Nuhou and Puhi Roads and Nani Street at the time it was conducted.

In the vicinity of the Petition Area, Kaumuali'i Highway is a predominantly two-lane, two-way State roadway generally oriented in the east-west direction. At the signalized intersection with Puhi Road, both approaches of Kaumuali'i Highway have exclusive turning lanes and one through lane.

Puhi Road is a predominantly two-lane, two-way County roadway generally oriented in the north-south direction. At the intersection with Kaumuali'i Highway, the northbound approach of Puhi Road has a shared left-turn and through lane, and an exclusive right-turn lane. The southbound approach of the intersection is comprised of the western access road for Kaua'i Community College and Island School, which has a shared left-turn and through lane, and an exclusive right-turn lane. An additional westbound departure lane is provided along Kaumuali'i Highway at this intersection to allow southbound right-turning vehicles to proceed freely through the intersection.

Northeast of the intersection with Puhi Road, Kaumuali'i Highway intersects Nani Street. At this unsignalized T-intersection, the eastbound approach of the highway has one lane that serves through and right-turn traffic movements, while the westbound approach has one lane that serves left-turn and through traffic movements. Nani Street is a two-lane, two-way County roadway generally oriented in the north-south direction. At the intersection with the highway, the Nani Street approach has one lane that serves left-turn and right-turn traffic movements.

Further northeast, Kaumuali'i Highway intersects Nuhou Street. At this signalized intersection, the eastbound approach of the highway has exclusive turning lanes and one through lane, while the westbound approach has one through lane and a shared through and right-turn lane. Nuhou Street is a four-lane, two-way County roadway generally oriented in the north-south direction. At the intersection with the highway, the northbound approach of Nuhou Street has a shared left-turn and through lane, and an exclusive right-turn lane. The southbound approach of the intersection is comprised of the eastern access for Kaua'i Community College and Island School, which has one lane that serves all traffic movements.

Traffic Volumes and Conditions: The TIR analyzed traffic conditions at the following intersections in the vicinity of the Petition Area during the weekday AM and PM peak traffic hour periods:

- Kaumuali'i Highway and Puhi Road
- Kaumuali'i Highway and Nani Street
- Kaumuali'i Highway and Nuhou Street

Field investigations were conducted on September 14-16, 2010 at the above intersections, which consisted of manual turning movement count surveys during the morning peak hours between 6:00 AM and 9:00 AM, and the afternoon peak hours between 3:00 PM and 6:00 PM. In addition, a 24-hour mechanical count survey was conducted along the main access for Kaua'i Community College north of the Kaumuali'i Highway and Puhi Road intersection.

The morning peak hour of traffic generally occurs between 7:15 AM and 8:15 AM in the vicinity of the Petition Area. The afternoon peak hour of traffic generally occurs between 4:00 PM and 5:00 PM.

The highway capacity analysis performed in this TIR is based upon procedures presented in the "Highway Capacity Manual", Transportation Research Board, 2000, and the "Synchro" software developed by Trafficware. The analysis is based on the concept of Level of Service (LOS) to identify the traffic impacts associated with traffic demands during the peak hours of traffic. LOS is a quantitative and qualitative assessment of traffic operations. LOS are defined by LOS "A"

through “F”, with LOS “A” representing ideal or free-flow traffic operating conditions and LOS “F” representing unacceptable or potentially congested traffic operating conditions.

Existing Traffic Conditions: Existing peak hour traffic conditions at the study intersections are as follows:

Kaumuali'i Highway and Puhi Road: At the intersection with Puhi Road, Kaumuali'i Highway carries higher traffic volumes during the PM peak period versus the AM peak period. The left-turn traffic movement on both the eastbound and westbound approaches of the highway operate at LOS “D” and LOS “E” during the AM and PM peak periods, respectively, while the right-turn traffic movements operate at LOS “B” during both peak periods. The eastbound through traffic movement operates at LOS “C” during both peak periods, while the westbound through traffic movement operates at LOS “C” and LOS “D” during the AM and PM peak periods, respectively.

The northbound left-turn and through traffic movement on the Puhi Road approach of the intersection operates at LOS “D” and LOS “E” during the AM and PM peak periods, respectively, while the right-turn traffic movement operates at LOS “C” and LOS “D” during the AM and PM peak periods, respectively.

The southbound left-turn and through traffic movement on this approach of the intersection operates at LOS “C” and LOS “E” during the AM and PM peak periods, respectively.

Kaumuali'i Highway and Nani Street: At the intersection with Nani Street, Kaumuali'i Highway carries higher traffic volumes during the PM peak period versus the AM peak period. The critical traffic movement along the highway at the intersection is the westbound approach which operates at LOS “A” during both peak periods.

Kaumuali'i Highway and Nuhou Street: At the intersection with Nuhou Street, Kaumuali'i Highway carries higher traffic volumes westbound during the AM peak period versus the PM peak period, and higher traffic volumes eastbound during the PM peak period versus the AM peak period. The left-turn traffic movement on both approaches of the highway operates at LOS “E” during both peak periods, while the eastbound through and westbound through and right-turn traffic movements operate at LOS “C” during both peak periods. The eastbound right-turn traffic movement along the highway operates at LOS “B” during both peak periods.

The traffic movements on the Nuhou Street (northbound) approach of the intersection operate at LOS “D” during both peak periods. The southbound approach of the intersection operates at LOS “E” and LOS “D” during the AM and PM peak periods, respectively.

Impacts and Mitigation Measures

Short-Term Impacts and Mitigation Measures: During construction of the proposed project, short-term traffic impacts will occur from construction vehicles such as earthmovers and heavy trucks transporting equipment and materials. However, as the construction schedule for the updated master plan improvements will occur over a period of time through 2020, the resulting traffic impacts will be correspondingly reduced. Traffic control measures will be implemented during construction to mitigate potential traffic impacts along the roads in the immediate project vicinity. Such mitigation will include restricting the transport of large, slow-moving, heavy

construction vehicles or equipment during the AM and PM peak traffic hours, and the use of flaggers and/or off-duty police officers to direct traffic during significant phases of construction.

Long-Term Impacts and Mitigation Measures:

Projected Traffic Conditions: Traffic conditions were forecast to Year 2020, the anticipated completion date of the proposed project.

The travel forecast is based upon historical traffic count data obtained from the State Department of Transportation (DOT) Highway Division survey stations in the vicinity of the Petition Area. The historical data indicates a stable or declining growth in traffic. As such, an annual traffic growth rate of approximately 0.5 percent per year was conservatively assumed along Kaumuali'i Highway in the project vicinity. Using 2010 as the Base Year, a growth factor of 1.05 was applied to the existing through traffic demands along Kaumuali'i Highway to achieve the projected Year 2020 traffic demands.

Other Considerations: Kaua'i Community College's Long Range Development Plan (LRDP) includes the construction of a number of new facilities to allow the expansion of existing programs. In conjunction with the planned expansion, enrollment at Kaua'i Community College is expected to increase from the current enrollment of 864 students to an enrollment of 1,038 students by the Year 2020. The increase in enrollment at Kaua'i Community College is expected to result in approximately 35 new trips during the AM peak period and 35 new trips during the PM peak period.

The DOT is currently widening Kaumuali'i Highway from a two-lane undivided highway to a four-lane divided highway between Anonui Road and the Līhu'e Mill Bridge. The highway will have two travel lanes in each direction, with auxiliary lanes provided at the intersections along this segment once construction is completed. The widening of Kaumuali'i Highway from the Līhu'e Mill Bridge to the Kaua'i Community College entrance was completed in September 2012.

Year 2020 Without Project: The projected Year 2020 AM and PM peak hour traffic operating conditions without the implementation of Island School's updated master plan are shown in Table 2. The existing levels of service are provided for comparison purposes. Kaumuali'i Highway is assumed to be widened to a four-lane divided highway by the Year 2020, with a westbound left-turn bay provided at the intersection with Nani Street.

Traffic operations in the vicinity of Island School without the implementation of their updated master plan are expected to improve during both peak hours of traffic due to the widening of Kaumuali'i Highway to a four-lane-divided highway. The traffic movements at the intersection of Kaumuali'i Highway with Puhi Road are expected to operate at LOS "C" or better during the AM peak period and LOS "D" or better during the PM peak period, while those at the intersection with Nani Street are expected to operate at LOS "B" or better during both peak periods. At the intersection with Nuhou Street, the traffic movements are expected to operate at LOS "D" or better during both peak periods.

Intersection	Critical Traffic Movement		AM		PM	
			Existing	Year 2020 Without Project	Existing	Year 2020 Without Project
Kaumuali'i Hwy/ Puhi Road	Eastbound	LT	D	C	E	D
		TH	C	B	C	B
		RT	B	B	B	B
	Westbound	LT	D	C	E	D
		TH	C	B	D	B
		RT	B	B	B	B
	Northbound	LT-TH	D	C	E	C
		RT	C	B	D	B
	Southbound	LT-TH	C	B	E	C
		RT	-	B	-	B
Kaumuali'i Hwy/ Nani Street	Westbound	LT	A	A	A	B
		TH		-		-
	Northbound	LT-RT	C	B	C	B
Kaumuali'i Hwy/ Nuhou Street	Eastbound	LT	E	D	E	D
		TH	C	B	C	B
		RT	B	B	B	B
	Westbound	LT	E	C	E	D
		TH-RT	C	B	C	B
	Northbound	LT-TH	D	C	D	C
		RT	D	C	D	B
	Southbound	LT-TH-RT	E	C	D	C

Year 2020 With Project: The Year 2020 cumulative AM and PM peak hour traffic conditions with the implementation of Island School's updated master plan are summarized in Table 3. The projected Year 2020 operating conditions without the proposed project are provided for comparison purposes.

Traffic operations in the vicinity of Island School with the implementation of its updated master plan are expected, in general, to operate at levels of service similar to Year 2020 without project conditions despite the addition of site-generated traffic to the surrounding roadways. The southbound left-turn and through traffic movement at the intersection of Kaumuali'i Highway with Puhi Street is expected to operate at a slightly lower level of service during the AM peak period. Similarly, at the intersection of Kaumuali'i Highway with Nuhou Street, the eastbound through and westbound left-turn traffic movements, as well as the southbound approach, are expected to operate at slightly lower levels of service during the AM peak period. The remaining critical movements at these intersections, as well as the other study intersections, are expected to continue operating at levels of service similar to without project conditions. In addition, the total traffic volumes entering the study intersections are expected to increase by 2 to 3 percent during the AM peak period, and less than 1 percent during the PM peak period with the proposed project. These increases in the total traffic volumes are in the range of daily volume

fluctuations along Kaumuali'i Highway and represent a minimal increase in the overall traffic volumes.

Intersection	Critical Traffic Movement		AM		PM	
			Year 2020 Without Project	Year 2020 With Project	Year 2020 Without Project	Year 2020 With Project
Kaumuali'i Hwy/ Puhi Road	Eastbound	LT	C	C	D	D
		TH	B	B	B	B
		RT	B	B	B	B
	Westbound	LT	C	C	D	D
		TH	B	B	B	B
		RT	B	B	B	B
	Northbound	LT-TH	C	C	C	C
		RT	B	B	B	B
	Southbound	LT-TH	B	C	C	C
		RT	B	B	B	B
Kaumuali'i Hwy/ Nani Street	Westbound	LT	A	A	B	B
	Northbound	LT-RT	B	B	B	B
Kaumuali'i Hwy/ Nuhou Street	Eastbound	LT	D	D	D	D
		TH	B	C	B	B
		RT	B	B	B	B
	Westbound	LT	C	D	D	D
		TH-RT	B	B	B	B
	Northbound	LT-TH	C	C	C	C
		RT	C	C	B	B
	Southbound	LT-TH-RT	C	D	C	C

Recommendations: Based on the analysis of the traffic data, the following are the recommendations of the TIR with the proposed project:

1. Maintain sufficient sight distance for motorists to safely enter and exit all project roadways.
2. Maintain adequate on-site loading and off-loading service areas and prohibit off-site loading operations.
3. Maintain adequate turn-around area for service, delivery, and refuse collection vehicles to maneuver on-site to avoid vehicle-reversing maneuvers onto public roadways.
4. Maintain sufficient turning radii at all project roadways to avoid or minimize vehicle encroachments to oncoming traffic lanes.

5. If the implementation of Island School's updated master plan is not completed by the Year 2020, prepare an updated Traffic Impact Report that incorporates a revised project completion year.

To reduce the use of automobiles, ongoing sustainable transportation options by Island School include providing bus transportation between home and school for students residing within the North Shore and eastern areas of the Island; implementing car pooling for students and staff; and, encouraging bicycling and walking by students residing near the campus by way of the sidewalks/pedestrian pathways along the existing loop road providing access to the school.

3.15 Socio-Economic Characteristics

The Petition Area is within the Puhi-Hanamā'ulu Census Tract (CT) 404 based on the 2010 Census, and the Puhi-Hanamā'ulu Census County Division (CCD) based on the 2006-2010 American Community Survey 5-Year Estimates. The American Community Survey is conducted every year to provide up-to-date information about the social and economic needs of communities.

Population and Housing: An overview of the population and housing characteristics of the Puhi-Hanamā'ulu CT in comparison to the Island of Kaua'i is shown in Table 4.

- The median age of the Puhi-Hanamā'ulu CT population is slightly lower than Kaua'i at 39.3 versus 41.3;
- By racial mix, there are more Asians and less Whites and Native Hawaiian and other Pacific Islanders in the Puhi-Hanamā'ulu CT than Kaua'i;
- Households in the Puhi-Hanamā'ulu CT have a larger family household and average household and family size, but lower non-family household than Kaua'i; and,
- The Puhi-Hanamā'ulu CT has more occupied housing units and owner-occupied housing units, but slightly lower renter-occupied housing units than Kaua'i.

Subject	CT 404 (Puhi-Hanamā'ulu)		Kaua'i County	
	Number	Percent	Number	Percent
Total Population	8,740	100	67,091	100
AGE				
Under 5 years	587	6.7	4,281	6.4
5 – 9 years	594	6.8	4,179	6.2
10 – 14 years	574	6.6	4,055	6.0
15 – 19 years	573	6.6	4,146	6.2
20 – 24 years	491	5.6	3,472	5.2
25 – 29 years	557	6.4	4,161	6.2
30 – 34 years	511	5.8	3,980	5.9
35 – 39 years	582	6.7	4,018	6.0
40 – 44 years	599	6.9	4,354	6.5
45 – 49 years	703	8.0	4,849	7.2
50 – 54 years	638	7.3	5,390	8.0
55 – 59 years	582	6.7	5,483	8.2
60 – 64 years	452	5.2	4,738	7.1
65 – 69 years	368	4.2	3,234	4.8
70 – 74 years	266	3.0	2,113	3.1

Subject	CT 404 (Puhi-Hanamā'ulu)		Kaua'i County	
	Number	Percent	Number	Percent
Total Population	8,740	100	67,091	100
75 – 79 years	218	2.5	1,632	2.4
80 – 84 years	188	2.2	1,390	2.1
85 years and over	257	2.9	1,616	2.4
Median age (years)	39.3	--	41.3	--
RACE				
White	1,513	17.3	22,159	33.0
Black or African American	32	0.4	278	0.4
American Indian and Alaska Native	12	0.1	254	0.4
Asian	4,529	51.8	21,016	31.3
Native Hawaiian and other Pacific Islander	632	7.2	6,060	9.0
Some Other Race	85	1.0	608	0.9
Two or more races	1,937	22.2	16,716	24.9
HOUSEHOLD BY TYPE				
Total Households	2,564	100.0	23,240	100.0
Family households (families)	1,923	75.0	16,147	69.5
Non-family households	641	25.0	7,093	30.5
Average household size	3.23	--	2.84	--
Average family size	3.66	--	3.31	--
HOUSING OCCUPANCY				
Total Housing Units	2,876	100.0	29,793	100.0
Occupied housing units	2,564	89.2	23,240	78.0
Vacant housing units	312	10.8	6,553	22.0
HOUSING TENURE				
Occupied Housing Units	2,564	100.0	23,240	100.0
Owner-occupied housing units	1,575	61.4	13,968	60.1
Renter-occupied housing units	989	38.6	9,272	39.9

Source: U.S. Census Bureau, Census 2010

Social and Economic: An overview of the social and economic characteristics of the Puhi-Hanamā'ulu CCD in comparison to the Island of Kaua'i is shown in Table 5.

- For the population 25 years and older in the Puhi-Hanamā'ulu CCD, the high school graduates or higher and those with bachelor's degree or higher are slightly lower than Kaua'i;
- The population in the labor force age 16 and over in the Puhi-Hanamā'ulu CCD is slightly higher than Kaua'i at 68.4 percent versus 67.0 percent; and,

- The median household income for the Puhi-Hanamā‘ulu CCD is \$64,234, which is greater than the median household income for Kaua‘i which is \$62,531. However, the median family income and per capita income for the Puhi-Hanamā‘ulu CCD are slightly lower than Kaua‘i at \$70,957 versus \$71,847, and \$24,539 versus \$26,513, respectively.

Subject	Puhi-Hanamā‘ulu CCD		Kaua‘i County	
	Number	Percent	Number	Percent
Total Population	8,530	100	65,460	100
SOCIAL CHARACTERISTICS				
Population 25 years and over	5,886		45,286	
High school graduate or higher	1,750	29.7	13,701	30.3
Bachelor’s degree or higher	822	14.0	7,214	15.9
ECONOMIC CHARACTERISTICS				
In labor force (pop. 16 & over)	4,683	68.4	35,100	67.0
Median household income (dollars)	64,234	--	62,531	--
Median family income (dollars)	70,957	--	71,847	--
Per capita income (dollars)	24,539	--	26,513	--

Source: 2006-2010 American Community Survey 5-Year Estimates

Impacts and Mitigation Measures

In the short term, the proposed project will bring about positive benefits to the local economy. This would include increased expenditures for construction, construction-related jobs and tax revenue. Direct economic benefits will result from construction expenditures both through the purchase of material from local suppliers and through the employment of local labor, thereby stimulating that sector of the economy. Indirect economic benefits may include benefits to local retailing businesses resulting from construction activities.

Construction activities associated with the proposed project will create some adverse short-term impacts such as temporary disruption of traffic, unavoidable noise impacts, and air quality impacts from soil excavation and grading activities in the vicinity of the Petition Area. The construction contractor(s) will be required to mitigate potential vehicular traffic impacts through appropriate traffic control measures (see Section 3.14 Traffic). Unavoidable construction noise impacts on nearby land uses in the immediate vicinity of the proposed project will be mitigated to some degree by complying with the provisions of the State DOH Administrative Rules, Title 11, Chapter 46, Community Noise Control (see Section 3.9 Noise). Potential air quality impacts during construction of the proposed project will be mitigated by complying with the State DOH Administrative Rules, Title 11, Chapter 60, Air Pollution Control (see Section 3.8 Air Quality).

In the long-term, the project will contribute toward positive economic benefits through the employment of labor associated with the increased faculty and staff associated with the updated master plan improvements. An increase of approximately 22 FTE faculty and staff, to the current 62 FTE members, for a total of 84 FTE members, will be required for the future increase in the student enrollment to approximately 500 students.

Currently, approximately 35 organizations utilize facilities at Island School, 27 of which do so on a recurring basis. The proposed updated master plan improvements will provide additional facilities that may be available for use by organizations. This sharing of facilities reduces the demand for construction of new facilities to serve these organizations.

3.16 Civil Defense

The closest designated civil defense shelters to the Petition Area are at the adjacent Kaua'i Community College located to the south, and at Chiefess Kamakahelei Middle School located approximately 0.5 mile to the southeast, at the intersection of Kaumuali'i Highway and Nuhou Street. The closest civil defense siren to the Petition Area is located in Puhi (Siren 315).

Impacts and Mitigation Measures

The State Department of Defense, Office of the Director of Civil Defense, by letter dated August 30, 2012 commenting on the pre-assessment consultation, indicated that the Petition Area is covered by the arc of an existing warning siren.

Island School has an agreement with Kaua'i Community College which allows its students, faculty and staff to evacuate to the College's facilities in the event of an emergency situation requiring immediate evacuation.

3.17 Police and Fire Protection Services

Police Protection: Police protection service for the project area is provided by the County Police Department's Līhu'e Headquarters, Sectors 4 to 6, located approximately 2.7 miles east of the Petition Area at 3990 Kā'ana Street.

Fire Protection: Fire protection service for the project area is provided by the County's Līhu'e Fire Station located at 4223 Rice Street, approximately 2.1 miles east of the Petition Area.

Impacts and Mitigation Measures

The proposed project will not adversely impact police and fire protection services. Although it is anticipated that the proposed project would require the occasional police and fire protection services, it would likely not represent a significant proportion of the overall regional demand. The proposed project will be designed and built in compliance with the applicable County fire code requirements.

3.18 Medical Services

Emergency medical service is provided by American Medical Response, a private ambulance service contracted by the County to provide ambulance and paramedic services, located at 3277 Palai Street, approximately 2.3 miles northeast of the Petition Area.

Health care services are available at the Wilcox Memorial Hospital located at 3420 Kūhiō Highway, approximately 2.2 miles northeast of the Petition Area. Wilcox Memorial Hospital consists of the main clinic and hospital that provides men's, women's, and children's health care services, specialty services, elderly care, family support, a long-term care units, and education and prevention services.

Impacts and Mitigation Measures

The proposed project is not anticipated to generate significant demands on medical services. The existing medical facilities and ambulance service will be adequate to serve the needs of the project.

3.19 Schools

There are a total of 19 public and charter schools on Kaua'i, including ten elementary schools, two middle schools, three high schools, and four charter schools. Public schools servicing the Līhu'e region include King Kaumuali'i Elementary School (Grades K to 5) located approximately 3.2 miles northeast of the Petition Area; Wilcox Elementary School (Grades K to 5) located approximately 2.0 miles east of the Petition Area; Chiefess Kamakahelei Middle School (Grades 6 to 8) located approximately 0.7 mile south of the Petition Area; and Kaua'i High School (Grades 9 to 12) located approximately 2.6 miles southeast of the Petition Area. Two Hawaiian Language Immersion schools, including the Punana Leo o Kaua'i Pre-School and Kawaikini New Century Public Charter School (Grades K to 12), are located approximately 0.2 mile south of the Petition Area, within the Kaua'i Community College property.

According to the State Department of Education (DOE), for school year 2011-2012, student enrollment at King Kaumuali'i Elementary School is 611 students, 933 students at Wilcox Elementary School, 889 students at Chiefess Kamakahelei Middle School, 1,187 students at Kaua'i High School, and 109 students at Kawaikini New Century Public Charter School.

There are a total of eight private schools on Kaua'i, including Island School. The other seven private schools include Kahili Adventist School in Lawai (Grades K to 12), Kaua'i Christian Academy in Kīlauea (Grades Pre-K to 12), Olelo Christian Academy in Līhu'e (Grades K to 12), St. Catherine School in Kapaa (Grades Pre-K to 8), St. Theresa School in Kekaha (Grades Pre-K to 8), Kaua'i Pacific School in Kīlauea (Grades Pre-K to 6), and Crater Hill School in Kīlauea (Grades Pre-K to 6).

Impacts and Mitigation Measures

The proposed project is not anticipated to adversely affect existing schools on Kaua'i or in the Līhu'e/Puhi region. The new campus facilities to accommodate future increase in student enrollment would reduce the burden on public school facilities in the area.

3.20 Recreational Facilities

The County's Department of Parks and Recreation operates 17 parks and recreational facilities in the Līhu'e/Puhi region, including 13 neighborhood parks, three beach parks, and Vidinha Memorial Stadium located to the east of the Petition Area near Līhu'e Airport, which is used as a venue for public sporting events. State parks and recreational facilities in the Līhu'e/Puhi region include Ahukini Recreation Pier State Park at Ahukini Landing located to the northeast of the Petition Area, and Nāwiliwili Small Boat Harbor located to the southeast of the Petition Area in Niualu. Kalapaki Beach and Running Waters Beach are located to the southeast of the Petition Area, adjacent to the Kaua'i Marriott Resort and Beach Club and Kaua'i Lagoons Resort, respectively.

There are two golf courses within the Līhu'e/Puhi region, including the Puakea Golf Course and Kaua'i Lagoons Golf Club located to the south and southeast of the Petition Area, respectively.

Impacts and Mitigation Measures

The construction and development of the proposed project are not anticipated to significantly impact public recreational facilities. In addition to an existing gymnasium with a regulation basketball court or two regulation volleyball courts, the updated Island School master plan will provide recreational facilities, including a track and football field, soccer field, baseball field, softball field, outdoor swimming pool, and playground facilities. Therefore, the proposed project will not generate a demand for off-site recreational facilities.

3.21 Solid Waste Disposal

The County Department of Public Works (DPW) maintains an Island-wide solid waste collection and disposal system. The existing Kekaha Landfill, located 1.3 miles northwest of the town of Kekaha on the southwest side of the Island, is the primary disposal site for solid waste on the Island. The County is currently seeking a lateral expansion of the Kekaha Landfill which could extend its capacity by about 12 years. The County is also seeking another landfill site as part of its long-term planning objectives.

Currently, refuse generated at the Island School campus is collected by a private refuse collection company and transported to the Kekaha Landfill for disposal. Island School has been implementing a recycling program for the past 12 years, including paper, cardboard, and participation in the State's "high five" program. The food waste generated by the school's food services is separated from the trash and provided to pig farmers. The school's recycling program has resulted in a reduction in the quantity of trash generated, as well as in the number of trash pick-up days from five days per week to three days per week.

Impacts and Mitigation Measures

No significant impacts to solid waste disposal are anticipated from the construction and development of the proposed project.

During construction of the project, a trash management and recycling program will be developed and implemented to minimize solid waste disposal at the County's Kekaha Landfill.

Upon development, refuse generated by the project will continue to be collected by a private refuse collection company and transported to the Kekaha Landfill for disposal. During operation of the project, it is estimated that approximately 0.75 tons of solid waste will be generated per week for disposal at the County's landfill. In an effort to reduce the amount of solid waste to be generated, the on-campus recycling program will continue to be implemented, and food waste will continue to be provided to pig farmers. Composting of greenwaste will be employed for the project's landscaped areas.

3.22 Utilities

3.22.1 Wastewater System

Wastewater service for the Island School campus is provided by Grove Farm Company, Inc.'s Puhi Wastewater Treatment Plant (WWTP) located southeast of the Petition Area and makai of Kaunualii Highway. The privately-owned and operated WWTP currently has a design capacity of 1.0 million gallons per day (mgd), and is expandable to 3.0 mgd. The WWTP currently operates at R-1 effluent quality standards, the highest level of effluent quality regulated by the State. The WWTP currently treats approximately 400,000 gallons per day (gpd) of wastewater.

The treated effluent is used to irrigate the nearby Puakea Golf Course. The existing wastewater transmission system for the Island School campus includes a network of sewer lines varying in diameter from eight to 27 inches between the WWTP and Kaua'i Community College campus, from six to eight inches within the Kaua'i Community College campus, and six inches with the Island School campus.

Impacts and Mitigation Measures

The projected average wastewater flow for the proposed project is approximately 13,900 gpd, with a peak flow of approximately 88,400 gpd. The Puhi WWTP has sufficient capacity to serve the proposed project.

3.22.2 Water System

Potable water service for the Island School campus is provided by the County Department of Water's (DOW) Puhi 510-foot water system. A booster pump station located at the DOW's Puhi 393-foot water reservoir site provides source from the 393-foot water system to the 510-foot system. The Island School campus is currently served by a two-inch water meter, which has a maximum flow of 9,600 gallons per hour.

Island School currently has an agreement to utilize irrigation water from Grove Farm Company, Inc.'s irrigation ditch system which traverses within the Petition Area. Since rainfall is mostly sufficient for irrigation of landscaping within the campus, Island School has generally not utilized much irrigation water, except for a minimal amount for landscaping adjacent to the buildings over the past 20 years.

Impacts and Mitigation Measures

The projected average daily water demand for the proposed project is approximately 4,700 gpd. The Petitioner will consult with the County DOW on the adequacy of the existing water system to accommodate the proposed project improvements.

Island School will continue to have use of irrigation water from Grove Farm Company, Inc.'s irrigation ditch system, as needed. The projected average demand for irrigation water for the Island School campus with the updated master plan improvements is approximately 65,000 gpd. As the average flow of the irrigation ditch within the Petition Area is approximately 1.0 mgd, the irrigation water system would be adequate to meet the irrigation demands of the proposed project.

3.22.3 Drainage System

Currently, storm runoff from the Petition Area sheetflows to three existing plantation-era irrigation ditches located within the site, and one existing plantation-era irrigation ditch located adjacent to and south of the site, and is then directed to an existing adjacent reservoir (see Figure 3-5). The ditches and reservoir are part of Grove Farm Company, Inc.'s (formerly Līhu'e Plantation Company, Ltd.'s) irrigation system. The ditch identified as CSH 2, located along the western and southwestern boundaries of the Petition Area, collects storm runoff from the western portion of the Island School campus. The ditch identified as CSH 3, located within the eastern portion of the Petition Area, is an active irrigation ditch that enters the Petition Area from the north and feeds into the reservoir adjacent to the south-central boundary of the Petition Area. The ditch identified as CSH 4, located along the southeastern boundary of the Petition Area, is fed by the adjacent reservoir. The irrigation ditch located south of the Petition Area

flows out of the adjacent reservoir, and also collects storm runoff from the Island School campus.

Impacts and Mitigation Measures

Potential impacts to the quality of nearby surface waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins. No construction activities in conjunction with the proposed project will occur within the adjacent reservoir.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

3.22.4 Electrical and Communications Systems

Electrical System: Electrical service to the Island School campus is provided by Kaua'i Island Utility Cooperative (KIUC) via an underground duct system to a pad-mounted transformer. In addition, a 200 kW solar photovoltaic facility has been constructed, and is currently operational, on an approximately one-acre site within the northeast portion of the Petition Area. The solar photovoltaic facility includes more than 1,200 solar panels that will generate clean, renewable solar energy to meet the daytime needs of the Island School campus.

Communications and Cable Systems: Data/telephone service to the Island School campus is provided by Hawaiian Telcom via an underground duct system to distribution equipment located within an electrical room. Fifty (50) pairs are provided to the distribution equipment, with 13 pairs currently in use.

Cable television (CATV) to the Island School campus is provided by Oceanic Time Warner Cable via an underground duct system to distribution equipment located within an electrical room.

Impacts and Mitigation Measures

Electrical System: Based on a high load of 87.36 kW, the existing transformer has approximately 60 kilovolt (kVA) of spare capacity available for future campus growth.

Island School will continue to employ sustainable measures to promote renewable energy sources and energy efficiency. The 200 kW solar photovoltaic facility within the Petition Area will generate clean, renewable solar energy to meet the daytime needs of the Island School campus, resulting in a reduction of fossil fuel energy by more than 50 percent. Energy demand and consumption will be further reduced through the use of solar and efficient, low-consumption lighting fixtures and equipment, such as Energy Star rated appliances. The campus buildings will be designed for natural ventilation to take advantage of the trade winds, including use of ceiling fans, and skylights will be utilized to allow natural light to illuminate interior spaces.

Communications and Cable Systems: The existing data/telephone cabling has sufficient spare capacity (37 spare pairs) for future campus growth.

The single coaxial cable has sufficient spare capacity for additional standard cable service required for future campus growth.

4. RELATIONSHIP TO LAND USE PLANS AND POLICIES

The proposed project's consistency with relevant State and County land use plans and policies is discussed below.

4.1 State Land Use District

The State Land Use Law, Chapter 205, HRS, is intended to preserve, protect, and encourage the development of lands in the State for uses which are best suited to the public health and welfare of Hawai'i's people. All lands in the State are classified into four land use districts by the SLUC: Urban, Agricultural, Conservation, and Rural. The Petition Area is currently designated within the State Agricultural District (see Figure 4-1).

The Petitioner is seeking to reclassify the Petition Area from the State Agricultural District to the State Urban District (see Figure 4-1a). The need to reclassify the Petition Area from the State Agricultural District to the Urban District is to be more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaumuali'i Highway. The reclassification of the Petition Area will allow the improvements in the proposed updated Island School master plan to be implemented without a State Special Permit. Reclassification of the Petition Area to the State Urban District would convey land use jurisdiction to the County, which would regulate uses through its Comprehensive Zoning Ordinance (CZO).

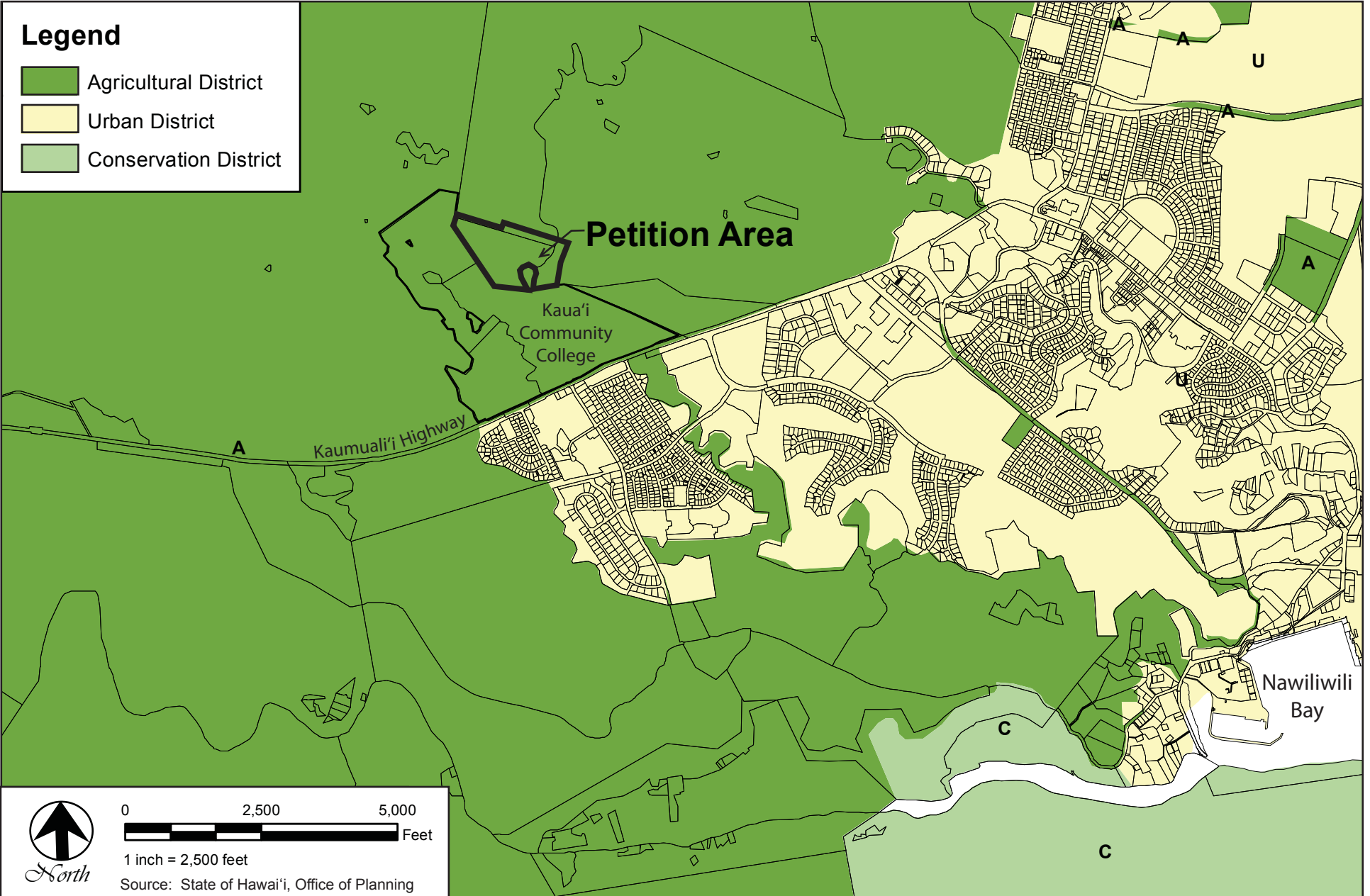
4.1.1 Conformance to the State Urban District Standards

The SLUC, in accordance with Chapter 15-15, HAR, must specifically consider the extent to which the proposed reclassification conforms to the applicable district standards. The standards for determining the boundaries for the Urban District include eight areas which are listed and discussed below:

- (1) *It shall include lands characterized by "city-like" concentrations of people, structures, streets, urban level of services and other related land uses;*

The proposed reclassification of the Petition Area from the State Agricultural District to the Urban District is more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaumuali'i Highway. The Petition Area is located in close proximity to the Līhu'e and Puhi areas, which provide urban levels of services and related land uses, including schools, Kaua'i Community College, civic, retail/commercial, residential, light industrial, golf courses, and parks/recreational facilities.

- (2) *It shall take into consideration the following specific factors:*
 - (A) *Proximity to centers of trading and employment except where the development would generate new centers of trading and employment;*
 - (B) *Availability of basic services such as schools, parks, wastewater systems, solid waste disposal, drainage, water, transportation systems, public utilities, and police and fire protection; and*
 - (C) *Sufficient reserve areas for foreseeable urban growth;*






Island School Updated Master Plan

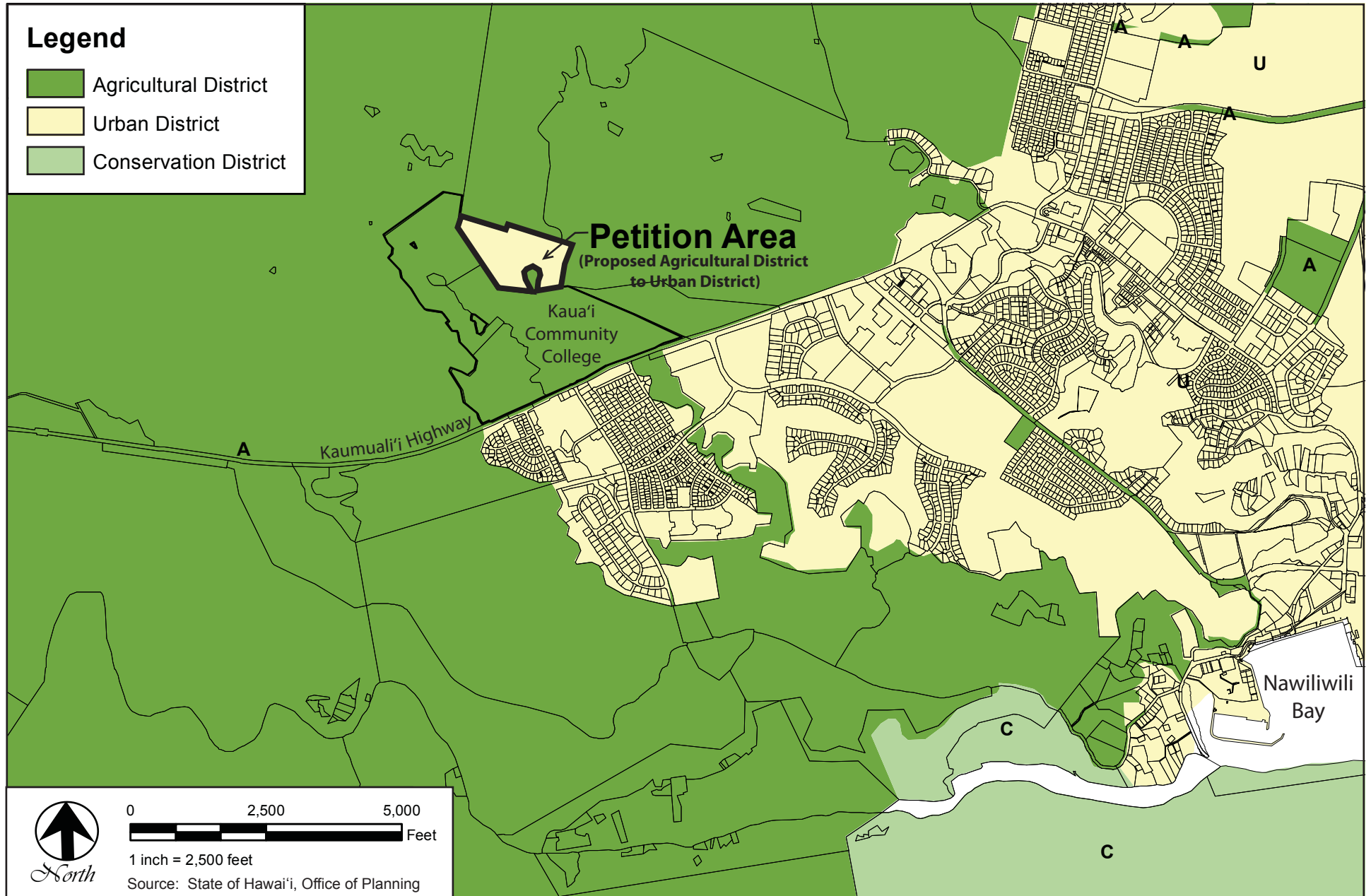
EXISTING STATE LAND USE DISTRICTS MAP

FIGURE

4-1

Legend

-  Agricultural District
-  Urban District
-  Conservation District



Island School Updated Master Plan

PROPOSED STATE LAND USE DISTRICTS MAP

FIGURE

4-1a

The Petition Area is located within Puhi and in close proximity to Līhu'e, areas of trading and employment. Līhu'e is the government center of Kaua'i with areas of trading and employment, including Līhu'e Airport, Nāwiliwili Harbor, Kalapaki commercial area, Līhu'e Industrial Park, U.S. Post Office, judiciary complex, Kaua'i Lagoons Resort, and Kaua'i Marriott Resort and Beach Club. Areas of trading and employment within Puhi include the adjacent Kaua'i Community College, Chiefess Kamakāhelei Middle School, Punana Leo o Kaua'i Preschool, Kawaikini New Century Public Charter School, Kukui Grove Center, Kukui Grove Village West commercial area, Puhi Industrial Park, and various retail and commercial establishments.

The County's Department of Parks and Recreation operates 17 parks and recreational facilities in the Līhu'e/Puhi region, including 13 neighborhood parks, three beach parks, and Vidinha Memorial Stadium located to the east of the Petition Area near Līhu'e Airport, which is used as a venue for public sporting events. State parks and recreational facilities in the Līhu'e/Puhi region include Ahukini Recreation Pier State Park at Ahukini Landing located to the northeast of the Petition Area, and Nāwiliwili Small Boat Harbor located to the southeast of the Petition Area in Niūmalu. Kalapaki Beach and Running Waters Beach are located to the southeast of the Petition Area, adjacent to the Kaua'i Marriott Resort and Beach Club and Kaua'i Lagoons Resort, respectively.

The Petition Area is in close proximity to public transportation systems, utilities and services. Vehicular access to the Petition Area is via a paved loop road from Kaumuali'i Highway, a State road located approximately 0.4-mile to the south. Other public roads intersecting Kaumuali'i Highway on its makai side include Puhi Road, Nani Street, and Nuhou Street. Traffic operations in the vicinity of Island School with the implementation of its updated master plan are expected, in general, to operate at levels of service similar to Year 2020 without project conditions despite the addition of site-generated traffic to the surrounding roadways.

The County Police Department's Līhu'e Headquarters is located approximately 2.7 miles east of the Petition Area on Kā'ana Street, and the County's Līhu'e Fire Station is located approximately 2.1 miles to the east on Rice Street.

The existing Kekaha Landfill, located 1.3 miles northwest of the town of Kekaha on the southwest side of the Island, is the primary disposal site for solid waste on the Island. The County DPW is seeking a lateral expansion of the Kekaha Landfill which could extend its capacity by about 12 years, and is also seeking another landfill site as part of its long-term planning objectives. During construction of the proposed project, a trash management and recycling program will be developed and implemented to minimize solid waste disposal at the Kekaha Landfill. In an effort to reduce the amount of solid waste to be generated upon development of the project, Island School will continue with implementation of its on-campus recycling program, and food waste generated by the school's food services will continue to be provided to pig farmers. Composting of greenwaste will be employed for the project's landscaped areas.

Potable water service for the Island School campus is provided by the County DOW's Puhi 510-foot water system. The projected average daily water demand for the proposed project is approximately 4,700 gpd. The Petitioner will consult with the County DOW on the adequacy of the existing water system to accommodate the proposed project. Island School will continue to have use of irrigation water from Grove Farm Company, Inc.'s irrigation ditch system, as needed. The projected average demand for irrigation water for the Island School campus with the updated master plan improvements is approximately 65,000 gpd. As the average flow of the irrigation ditch within the Petition Area is approximately 1.0 mgd, the irrigation water system would be adequate to meet the irrigation demands of the proposed project.

Wastewater service for the Island School campus is provided by Grove Farm Company, Inc.'s Puhi WWTP. The projected average wastewater flow for the proposed project is approximately 13,900 gpd, with a peak flow of approximately 88,400 gpd. The privately-owned and operated Puhi WWTP, which has a design capacity of 1.0 mgd and is expandable to 3.0 mgd, has sufficient capacity to serve the proposed project.

New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.




Although the Petition Area is presently not contiguous with existing urban areas, the University of Hawai'i Community Colleges is currently proposing to reclassify approximately 153 acres of the Kaua'i Community College campus, located adjacent to and southwest/south of the Petition Area, from the State Agricultural District to the Urban District (see Figure 4-1b). The reclassification of the Kaua'i Community College campus to the Urban District is deemed appropriate due to its current developed character as a campus. The Kaua'i Community College campus is, in turn, contiguous with existing Urban District lands to the south. The Petition for State Land Use District Boundary Amendment for the Kaua'i Community College campus is planned to be filed concurrently with Island School's Petition for State Land Use District Boundary Amendment. With the proposed reclassification of the Kaua'i Community College campus to the State Urban District, further expansion of the Urban District into the Petition Area would be logical, and will not contribute toward scattered or spot urban development.

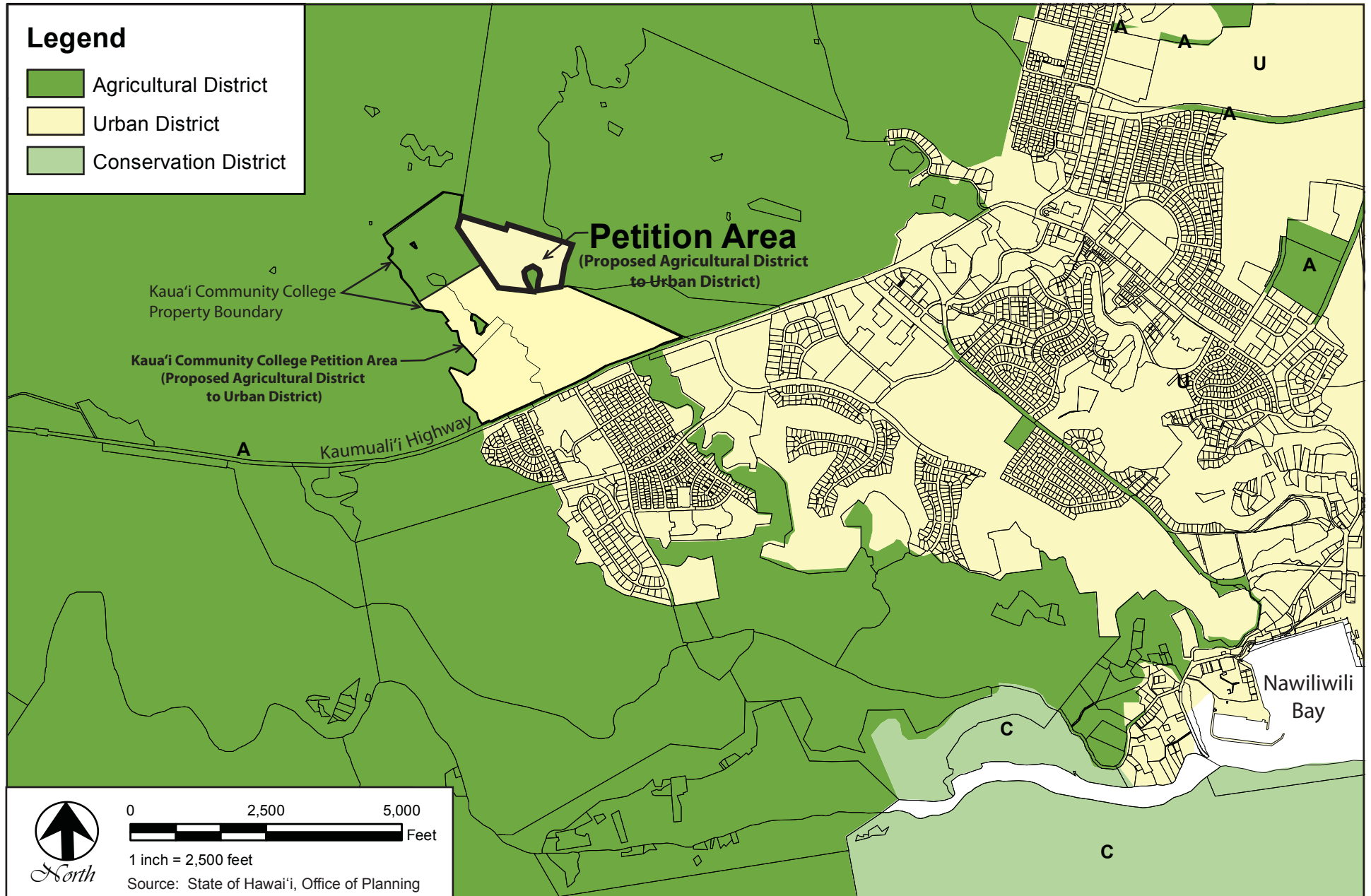
- (3) *It shall include lands with satisfactory topography, drainage, and reasonably free from the danger of any flood, tsunami, unstable soil conditions, and other adverse environmental effects;*

The existing topography of the Petition Area is gently sloping at approximately 3 percent, ranging in elevation from approximately 400 feet above msl at the northwestern portion to about 350 feet above msl at the eastern portion.

Currently, storm runoff from the Petition area sheetflows to three existing plantation-era irrigation ditches located within the site, and one existing plantation-era irrigation ditch located adjacent to and south of the site, and is

Legend

-  Agricultural District
-  Urban District
-  Conservation District



Island School Updated Master Plan

PROPOSED STATE LAND USE DISTRICTS MAP WITH KAUA'I COMMUNITY COLLEGE

FIGURE

4-1b

then directed to an existing adjacent reservoir. Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

According to the FIRM prepared by FEMA, the Petition Area is designated Zone "X", "Areas determined to be outside the 0.2% annual chance floodplain". The Petition Area is not within a tsunami inundation area as it is located approximately 2.7 miles inland (northwest) from the shoreline, and at elevations ranging from approximately 350 to 400 feet above msl.

- (4) *Land contiguous with existing urban areas shall be given more consideration than non-contiguous land, and particularly when indicated for future urban use on state or county general plans;*

Although the Petition Area is presently not contiguous with existing urban areas, the University of Hawai'i Community Colleges is currently proposing to reclassify approximately 153 acres of the Kaua'i Community College campus, located adjacent to and southwest/south of the Petition Area, from the State Agricultural District to the Urban District (see Figure 4-1b). The reclassification of the Kaua'i Community College campus to the Urban District is deemed appropriate due to its current developed character as a campus. The Kaua'i Community College campus is, in turn, contiguous with existing Urban District lands to the south. The Petition for State Land Use District Boundary Amendment for the Kaua'i Community College campus is planned to be filed concurrently with Island School's Petition for State Land Use District Boundary Amendment. With the proposed reclassification of the Kaua'i Community College campus to the State Urban District, further expansion of the Urban District into the Petition Area would be logical, and will not contribute toward scattered or spot urban development.

The Petitioner is proposing to amend the County General Plan Land Use Map for the Petition Area from the Agriculture designation to the Urban Center designation prior to petitioning for the State Land Use District Boundary Amendment. The proposed amendment to the Urban Center designation will be consistent with the existing Urban Center designation of the adjacent Kaua'i Community College campus, as well as lands to the south, makai of Kaumuali'i Highway.

- (5) *It shall include lands in appropriate locations for new urban concentrations and shall give consideration to areas of urban growth as shown on the state and county general plans;*

The Petition Area is an appropriate location for new urban concentration and growth given its locality within Puhi and close proximity to Līhu'e. The Petitioner will pursue amending the County General Plan Land Use Map for the Petition Area from the Agriculture designation to the Urban Center designation prior to

petitioning for the State Land Use District Boundary Amendment. The proposed amendment to the Urban Center designation will be consistent with the existing Urban Center designation of the adjacent Kaua'i Community College campus and lands to the south, makai of Kaumuali'i Highway.

- (6) *It may include lands which do not conform to the standards in paragraphs (1) to (5):*
- (A) *When surrounded by or adjacent to existing urban development; and*
 - (B) *Only when those lands represent a minor portion of this district;*

The Petition Area conforms to the referenced paragraphs (1) to (5) as described above.

- (7) *It shall not include lands, the urbanization of which will contribute toward scattered spot urban development, necessitating unreasonable investment in public infrastructure or support services; and*

Although the Petition Area is presently not contiguous with existing urban areas, the University of Hawai'i Community Colleges is currently proposing to reclassify approximately 153 acres of the Kaua'i Community College campus, located adjacent to and southwest/south of the Petition Area, from the State Agricultural District to the Urban District (see Figure 4-1b). The reclassification of the Kaua'i Community College campus to the Urban District is deemed appropriate due to its current developed character as a campus. The Kaua'i Community College campus is, in turn, contiguous with existing Urban District lands to the south. The Petition for State Land Use District Boundary Amendment for the Kaua'i Community College campus is planned to be filed concurrently with Island School's Petition for State Land Use District Boundary Amendment. With the proposed reclassification of the Kaua'i Community College campus to the State Urban District, further expansion of the Urban District into the Petition Area would be logical, and will not contribute toward scattered or spot urban development.

The proposed project will include all required on- and off-site infrastructure improvements to minimize the burden on public systems. The project is not anticipated to have any significant impacts on public services in the area as discussed in paragraph (2) above.

- (8) *It may include lands with a general slope of twenty per cent or more if the commission finds that those lands are desirable and suitable for urban purposes and that the design and construction of controls, as adopted by any federal, state, or county agency, are adequate to protect the public health, welfare and safety, and the public's interests in the aesthetic quality of the landscape.*

The existing topography of the Petition Area is gently sloping at approximately 3 percent, ranging in elevation from approximately 400 feet above msl at the northwestern portion to about 350 feet above msl at the eastern portion.

4.2 Hawai'i State Plan

The Hawai'i State Plan, embodied in Chapter 226, HRS, serves as a guide for goals, objectives, policies, and priority guidelines for statewide planning. The Hawai'i State Plan provides a basis for determining priorities, allocating limited resources, and improving coordination of State and County plans, policies, programs, projects, and regulatory activities. The Hawai'i State Plan also directs the appropriate State agencies to prepare functional plans for their respective program areas. The proposed project is consistent with the following Hawai'i State Plan objectives and policies:

Section 226-11 Objectives and policies for the physical environment – land-based, shoreline, and marine resources.

(b)(6) Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai'i.

The principal potential impact that the proposed project improvements poses to Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels is the increased threat that birds will be downed after becoming disoriented by outdoor lighting associated with possible nighttime construction activity, and following build-out with exterior lighting associated with the structures and appurtenances that are built within the Petition Area. Should nighttime work be required in conjunction with the project construction, and during operation of the proposed project, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally-flying Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels with external lights and man-made structures.

The principal potential impacts that the proposed project improvements pose to Nēnē are during construction, and following build-out with the increased student enrollment and associated school activities. If construction activity is planned to occur within the Petition Area during the Nēnē nesting season, which typically runs from October through March on Kaua'i, the Petition Area should be surveyed by a qualified biologist prior to the start of construction, to determine if any active Nēnē nesting activity is occurring on the site. If such nesting does occur during construction, it is recommended that a Nēnē monitor be on site during such activity to ensure that no harm occurs to the birds.

Due to the likelihood that the endangered Nēnē will utilize resources within the Petition Area, and the Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels could potentially fall onto the Petition Area during the construction phase of the project, it is recommended that an endangered species awareness program be developed to include general information on the endangered species act and protected species; specific restrictions that will be in force on the job site to protect endangered species; and protocol on who, and how job site personnel will respond to any downed or injured endangered species that may occur on the site. All construction personnel should be required to be familiar with the program, and its guidelines, restrictions and protocols to be followed.

The principal potential impact that the proposed project improvements pose to Hawaiian hoary bats is during the clearing and grubbing phases of the project. Areas of dense vegetation are likely used to some degree by roosting bats. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation, including woody plants greater than 15 feet, along the

periphery of the Petition Area should not occur between June 1 to September 15, when bats may be carrying young and potentially could be at risk by such clearing activities.

Section 226-12 Objectives and policies for the physical environment—scenic, natural beauty, and historic resources.

(b)(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage.

During the field inspection survey conducted in conjunction with the archaeological literature review for the Petition Area, a total of four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure were observed. The surface features consist of a reservoir located on a separate parcel adjacent to the south-central portion of the Petition Area (CSH 1), and three irrigation ditches (CSH 2, CSH 3, and CSH 4), two of which are associated with the adjacent reservoir. All of the surface features are currently in use. Based on an evaluation for significance according to the criteria established for the Hawai'i Register of Historic Places, no additional work appears to be necessary for the four features.

The proposed project improvements are not anticipated to have an adverse effect on the historic features related to plantation-era infrastructure. No project improvements are proposed to be constructed within or in the immediate vicinity of the plantation-era infrastructure. While no additional work appears to be necessary, consultation with the SHPD is being conducted to determine mitigation, if any, which may be appropriate for the plantation infrastructure features that have been recommended for no further work.

Should any previously unidentified burial, archaeological or historic sites be found during the course of construction of the proposed project, the Petitioner will stop work in the immediate vicinity and the SHPD will be notified immediately. The significance of these finds will then be determined and appropriate mitigation measures will be approved by the SHPD and, as necessary, the Kaua'i/Ni'ihau Islands Burial Council, as appropriate. Subsequent work will proceed after SHPD authorization has been received and mitigative measures have been implemented.

Aside from the four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure, no traditional Hawaiian sites or ancient trail systems were found within the Petition Area during the field inspection survey. Based on the literature review and field inspection survey, no burials are anticipated to be found within the Petition Area. Based on these findings, development of the proposed project will have minimal or no impact upon native Hawaiian cultural resources, beliefs and practices.

Section 226-13 Objectives and policies for the physical environment – land, air, and water quality.

(b)(3) Promote effective measures to achieve desired quality in Hawai'i's surface, ground, and coastal waters.

(b)(7) Encourage urban developments in close proximity to existing services and facilities.

Potential impacts to the quality of nearby surface and near shore coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES

General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins. No construction activities in conjunction with the proposed project will occur within the adjacent reservoir.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

The Petition Area is located within Puhi and in close proximity to Līhu'e, areas which provide existing urban levels of services and facilities, such as civic, schools, Kaua'i Community College, retail/commercial, light industrial, resort, and parks/recreational facilities.

Section 226-21 Objectives and policies for socio-cultural advancement—education.

(b)(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.

(b)(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.

Island School is Kaua'i's largest private, non-sectarian, independent school accommodating Grades Pre-K through 12, and has a current enrollment of approximately 370 students. Island School's mission is to prepare its students to live productive, fulfilling lives as confident, responsible life-long learners and contributing members of society; to express fully the talents of its faculty and administration through a challenging curriculum that prepares students for successful higher education; and, to provide a safe, nurturing environment that fosters creativity, critical thinking, initiative, and respect for self and others.

The proposed update of the Island School master plan will accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. An increase of approximately 22 FTE faculty and staff, to the current 62 FTE members, for a total of 84 FTE members, will be required for the future increase in student enrollment. The proposed updated master plan includes new, renovated and expanded classroom buildings; expanded administration facility and visual arts facility; new facilities, including science building, campus center, dining facility, auditorium and stage, arts education building, back-of-house building and courtyard, robotics shed, outdoor science area, maintenance facility, and informal gathering areas; playground and sports facilities, including physical education (P.E.) facilities, track and football field, soccer field, baseball field, softball field, and outdoor swimming pool; internal loop road with bus parking spaces; school and community drop-off areas; and, additional parking spaces.

Part III. Priority Guidelines

The purpose of establishing priority guidelines is to address areas of Statewide concern. The proposed project is consistent with the following priority guidelines:

Section 226-108 Sustainability. Priority guidelines and principles to promote sustainability shall include:

(1) Encouraging balanced economic, social, community, and environmental priorities.

(5) Promoting decisions based on meeting the needs of the present without compromising the needs of future generations.

(7) Emphasizing that everyone, including individuals, families, communities, businesses, and government, has the responsibility for achieving a sustainable Hawai'i.

The project proposes to incorporate Leadership in Energy and Environmental Design (LEED) standards and strategies, to the extent deemed economically feasible, to achieve sustainable site, utilities and building development. Green principles and strategies that are ongoing, or may be created for the proposed project, include those associated with sustainable sites, energy and water efficiency, building design, sustainable transport, and waste stream diversion as further discussed in Section 2.3 of this document.

In addition to these green principles and strategies, Island School will continue the following programs and activities toward achieving sustainability education, both within the campus and in the broader community.

- Kaua'i BOTS is an Island School robotics program that allows participation by students from Kaua'i's three public high schools. Approximately 40 percent of the participants in this cooperative program are public school students, thereby promoting efficient use of resources.
- Approximately 35 organizations currently utilize facilities at Island School, 27 of which do so on a recurring basis. This sharing of facilities reduces the demand for construction of new facilities to serve these organizations.
- Island School has a cooperative program with its neighboring Kaua'i Community College. In addition to receiving committee advisory assistance, the advanced students at Island School have the opportunity to take college level courses at the college. Such sharing of resources promotes sustainability.
- Island School is helping to establish a community garden within its campus through a private grant. The plan is to allow members of the Puhi community to participate in food production and share their gardening knowledge with Island School students.

4.3 Hawai'i Coastal Zone Management Program

The National Coastal Zone Management (CZM) Program was created through passage of the Coastal Zone Management Act of 1972. Hawai'i's CZM Program, adopted as Chapter 205A, HRS, provides a basis for protecting, restoring and responsibly developing coastal communities and resources. The coastal zone management area is defined as all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and

management authority, including the United States territorial sea (Section 205A-1, HRS). A discussion of the project's consistency with the objectives and policies under Section 205A-2, HRS, of the CZM Program is provided below.

(1) *Recreational Resources*

Objective:

Provide coastal recreational opportunities accessible to the public.

Policies:

- (A) *Improve coordination and funding of coastal recreational planning and management; and*
- (B) *Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:*
 - (i) *Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;*
 - (ii) *Requiring replacement of coastal resources having significant recreational value including, but not limited to surfing sites, fishponds, and sand beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when replacement is not feasible or desirable;*
 - (iii) *Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;*
 - (iv) *Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;*
 - (v) *Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;*
 - (vi) *Adopting water quality standards and regulating point and non-point sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;*
 - (vii) *Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and*
 - (viii) *Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting such dedication against the requirements of section 46-6.*

As the Petition Area is located approximately 2.7 miles inland (northwest) from the coastline, the proposed project will not provide or impact coastal recreational opportunities accessible to the public.

Potential water quality impacts to near shore coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm

Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

(2) *Historic Resources*

Objective:

Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawai'i and American history and culture.

Policies:

- (A) *Identify and analyze significant archaeological resources;*
- (B) *Maximize information retention through preservation of remains and artifacts or salvage operations; and*
- (C) *Support state goals for protection, restoration, interpretation, and display of historic resources.*

During the field inspection survey conducted in conjunction with the archaeological literature review for the Petition Area, a total of four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure were observed. The surface features consist of a reservoir located on a separate parcel adjacent to the south-central portion of the Petition Area (CSH 1), and three irrigation ditches (CSH 2, CSH 3, and CSH 4), two of which are associated with the adjacent reservoir. All of the surface features are currently in use. Based on an evaluation for significance according to the criteria established for the Hawai'i Register of Historic Places, no additional work appears to be necessary for the four features.

The proposed project improvements are not anticipated to have an adverse effect on the historic features related to plantation-era infrastructure. No project improvements are proposed to be constructed within or in the immediate vicinity of the plantation-era infrastructure. While no additional work appears to be necessary, consultation with the SHPD is being conducted to determine mitigation, if any, which may be appropriate for the plantation infrastructure features that have been recommended for no further work.

Pursuant to SHPD's review of the archaeological literature review and field inspection report by letter dated October 26, 2012, an archaeological inventory survey of the Petition Area will be conducted in conjunction with the Petition for State Land Use District Boundary Amendment for the project. A copy of this letter is included in Appendix B.

Should any previously unidentified burial, archaeological or historic sites be found during the course of construction of the proposed project, the Petitioner will stop work in the immediate

vicinity and the SHPD will be notified immediately. The significance of these finds will then be determined and appropriate mitigation measures will be approved by the SHPD and, as necessary, the Kaua'i/Ni'ihau Islands Burial Council, as appropriate. Subsequent work will proceed after SHPD authorization has been received and mitigative measures have been implemented.

Aside from the four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure, no traditional Hawaiian sites or ancient trail systems were found within the Petition Area during the field inspection survey. Based on the literature review and field inspection survey, no burials are anticipated to be found within the Petition Area. Based on these findings, development of the proposed project will have minimal or no impact upon native Hawaiian cultural resources, beliefs and practices.

(3) *Scenic and Open Space Resources*

Objective:

Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

- (A) *Identify valued scenic resources in the coastal zone management area;*
- (B) *Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;*
- (C) *Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and*
- (D) *Encourage those developments which are not coastal dependent to locate in inland areas.*

As the Petition Area is located approximately 2.7 miles inland (northwest) of the coastline, the proposed project will not affect scenic resources or public views to and along the shoreline.

(4) *Coastal Ecosystems*

Objective:

Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- (A) *Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;*
- (B) *Improve the technical basis for natural resource management;*
- (C) *Preserve valuable coastal ecosystems, including reefs, of significant biological or economic importance;*
- (D) *Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and*

- (E) *Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.*

Potential water quality impacts to near shore coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

(5) *Economic Uses*

Objective:

Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- (A) *Concentrate coastal dependent development in appropriate areas;*
(B) *Ensure that coastal dependent development such as harbors and ports, and coastal related development such as visitor industry facilities and energy generating facilities, are located, designed, and constructed to minimize adverse social, visual, and environmental impacts in the coastal zone management area; and*
(C) *Direct the location and expansion of coastal dependent developments to areas presently designated and used for such developments and permit reasonable long-term growth at such areas, and permit coastal dependent development outside of presently designated areas when:*
(i) *Use of presently designated locations is not feasible;*
(ii) *Adverse environmental effects are minimized; and*
(iii) *The development is important to the State's economy.*

The proposed project is to accommodate additional master plan facilities within the existing Island School campus located approximately 2.7 miles inland (northwest) from the coastline. The project is not a coastal dependent development.

(6) *Coastal Hazards*

Objectives:

Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence and pollution.

Policies:

- (A) *Develop and communicate adequate information about storm wave, tsunami, flood, erosion, subsidence, and point and nonpoint source pollution hazards;*
- (B) *Control development in areas subject to storm wave, tsunami, flood, erosion, hurricane, wind, subsidence, and point and nonpoint pollution hazards;*
- (C) *Ensure that developments comply with requirements of the Federal Flood Insurance Program; and*
- (D) *Prevent coastal flooding from inland projects.*

The Petition Area is not located within a flood hazard zone. According to the FIRM prepared by the FEMA, the Petition Area is located within Zone "X", defined as "Areas determined to be outside the 0.2% annual chance floodplain". The Petition Area is not within a tsunami inundation area as it is located approximately 2.7 miles inland (northwest) from the shoreline, and at elevations ranging from approximately 350 to 400 feet above msl.

(7) Managing Development

Objective:

Improve the development review process, communication, and public participation in the management of coastal resource and hazards.

Policies:

- (A) *Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;*
- (B) *Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and*
- (C) *Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.*

Government agencies, organizations and the general public are being notified of the proposed project, and being given an opportunity to comment on the project through the environmental review and land use boundary amendment process. Short- and long-term impacts have been assessed in this EA.

(8) Public Participation

Objective:

Stimulate public awareness, education, and participation in coastal management.

Policies:

- (A) *Promote public involvement in coastal zone management processes;*
- (B) *Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and*

- organizations concerned with coastal issues, developments, and government activities; and*
- (C) *Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.*

Government agencies, organizations and the general public are being notified of the proposed project, and being given an opportunity to comment on the project through the environmental review and land use boundary amendment process.

(9) *Beach Protection*

Objective:

Protect beaches for public use and recreation.

Policies:

- (A) *Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;*
- (B) *Prohibit construction of private erosion-protection structures seaward of the shoreline, except when they result in improved aesthetic and engineering solutions to erosion at the sites and do not interfere with existing recreational and waterline activities;*
- (C) *Minimize the construction of public erosion-protection structures seaward of the shoreline;*
- (D) *Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and*
- (E) *Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.*

As the Petition Area is located approximately 2.7 miles inland (northwest) from the shoreline, the proposed project will not impact beach systems or public access to beaches, and will not involve the construction of improvements in the shoreline setback or require any erosion-protection structures.

(10) *Marine Resources*

Objective:

Promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Policies:

- (A) *Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;*
- (B) *Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;*

- (C) *Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;*
- (D) *Promote research, study, and understanding of ocean processes, marine life, and other ocean resources to acquire and inventory information necessary to understand how ocean development activities relate to and impact upon ocean and coastal resources; and*
- (E) *Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.*

The proposed project is not anticipated to have any adverse impact on marine and coastal resources. Potential water quality impacts to near shore coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

4.4 County of Kaua'i General Plan

The County of Kaua'i General Plan (2000) provides broad policy statements to guide land use regulations, new developments and facilities, and planning for County facilities and services. Relevant sections of the General Plan and their consistency with the proposed project are as follows:

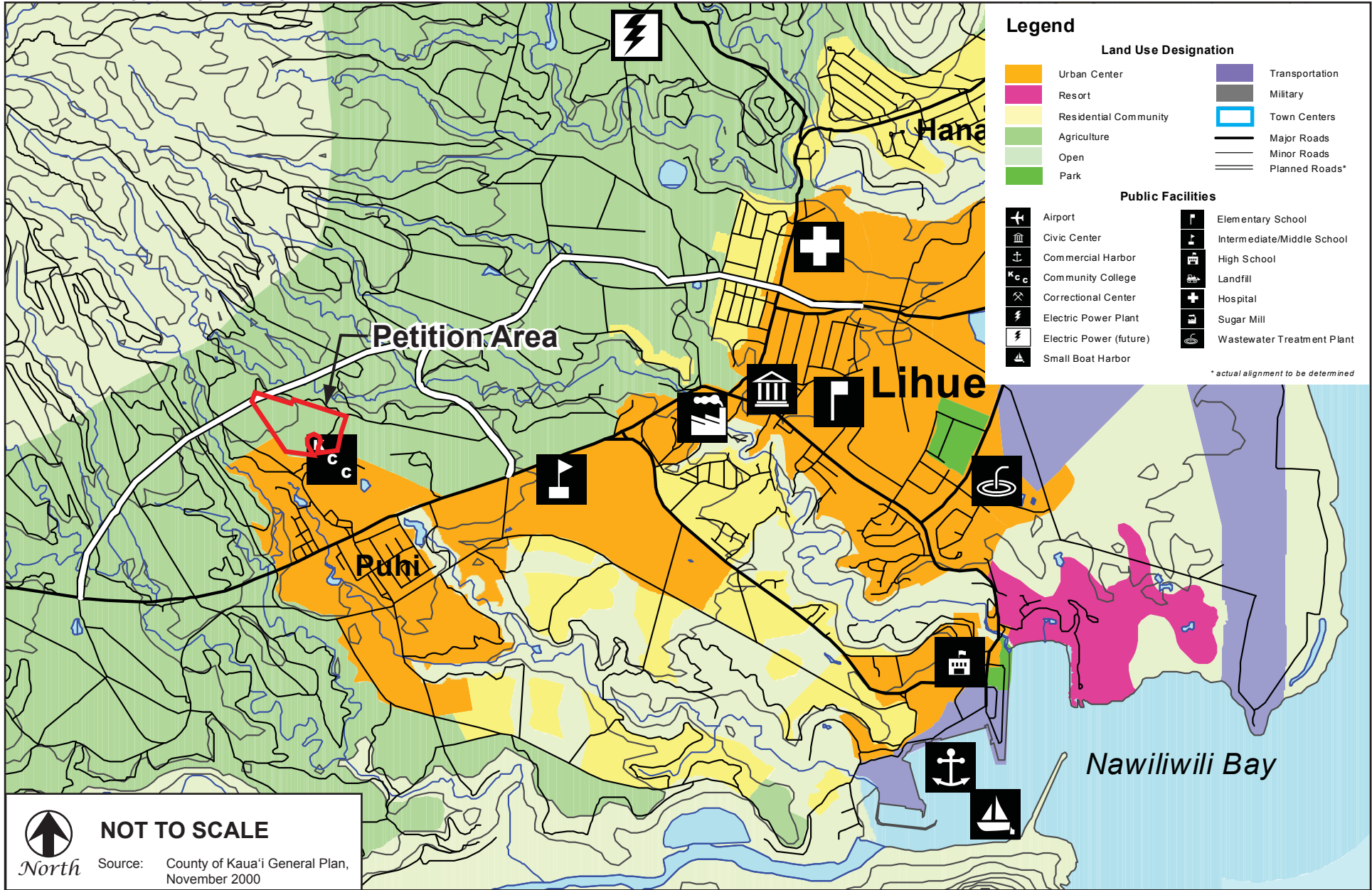
General Plan Land Use Map and Policies: The Līhu'e Planning District Land Use Map of the General Plan designates the Petition Area as Agriculture (see Figure 4-2).

The applicable policy for the Agriculture designation is as follows:

5.2 Agricultural Lands

5.2.1 Policy

- (a) *Lands included within the Agriculture designation shall be predominantly used for or held in reserve to be used in the future for agricultural activities. These activities include the breeding, planting, nourishing and caring for, gathering, and processing of any animal or plant organism, including aquatic animals and plants, for the purpose of producing food or material for non-food products; the commercial growing of flowers or other ornamental plants; the commercial growing of forest products; and the commercial breeding and caring for domestic animals and pets.*



NOT TO SCALE

Source: County of Kaua'i General Plan, November 2000

Island School Updated Master Plan

EXISTING COUNTY OF KAUA'I GENERAL PLAN LAND USE MAP

FIGURE

4-2

The Petition Area was previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) encompassing the western and central portions of the site, has been developed as the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. No intensive agricultural activities presently occur within the Petition Area. The Petition Area is rendered unsuitable for intensive agricultural uses given its use as a school since 1990.

The Petitioner is proposing to amend the County General Plan Land Use Map for the Petition Area from the Agriculture designation to the Urban Center designation prior to petitioning for the State Land Use District Boundary Amendment (see Figure 4-2a). The proposed amendment to the Urban Center designation will be consistent with the existing Urban Center designation of the adjacent Kaua'i Community College campus, as well as lands to the south, makai of Kaumuali'i Highway. Further, the amendment will not have a significant impact on adjoining or nearby agricultural lands as the proposed updated master plan improvements will occur entirely within the Petition Area, of which the majority of the site is currently developed as the Island School campus.

Other General Plan Policies Applicable to the Project: The proposed project is consistent with the following applicable policies of the General Plan:

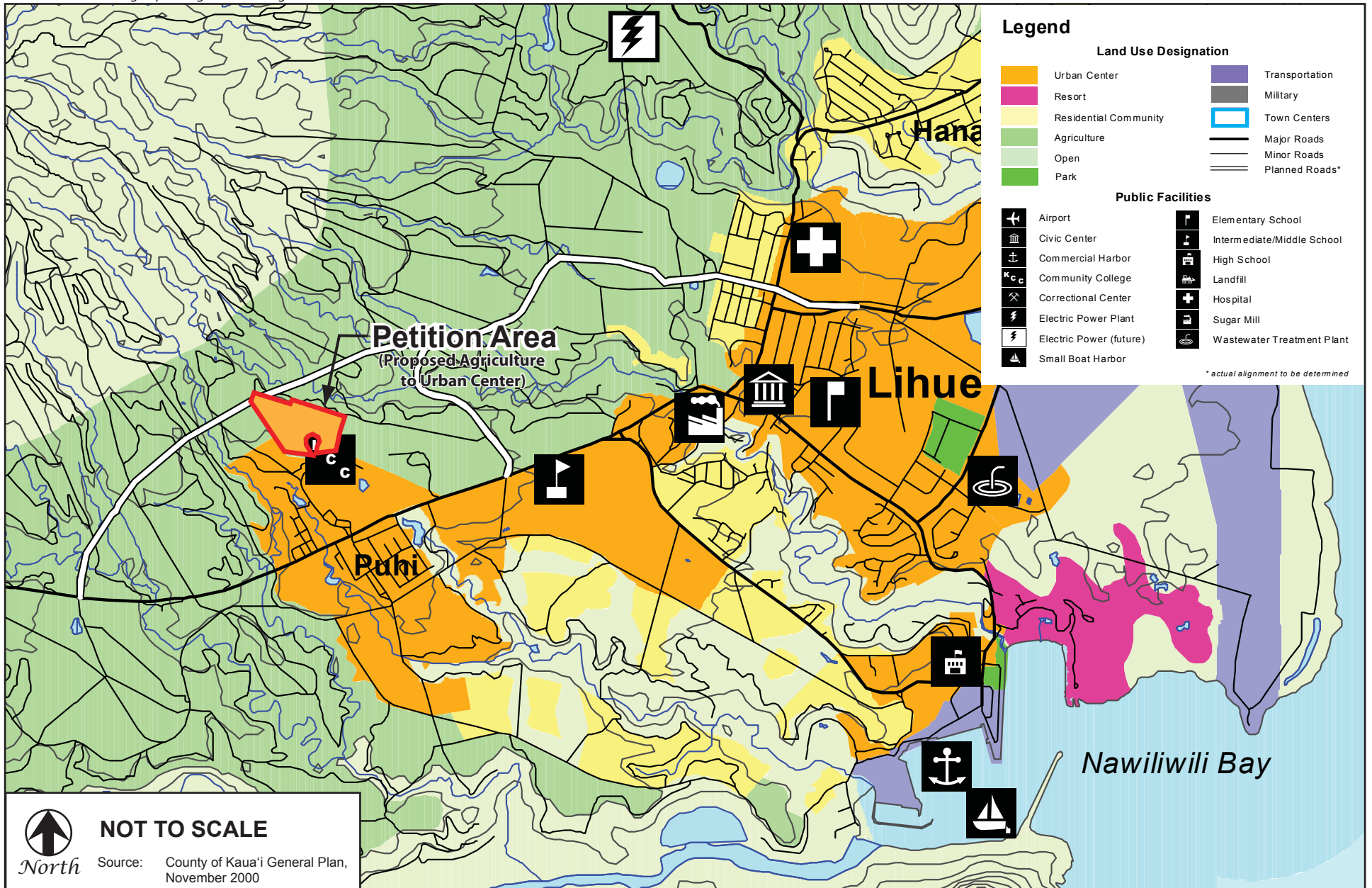
3.4 Watersheds, Streams and Water Quality

3.4.2 Policy

(b) Site Development. Plan, design and develop sites to:

- (1) Protect areas that provide important water quality benefits – i.e., wetlands;*
- (2) Protect areas that are particularly susceptible to erosion and sediment loss – i.e., stream banks;*

Potential impacts to the quality of nearby surface waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins. No construction activities in conjunction with the proposed project will occur within the adjacent reservoir.



NOT TO SCALE

North

Source: County of Kaua'i General Plan, November 2000

Island School Updated Master Plan

PROPOSED COUNTY OF KAUA'I GENERAL PLAN LAND USE MAP

FIGURE

4-2a

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

8.3 Education

8.3.1 Policy

- (a) Strive for a strong education system which provides Kauai's children, teens, college students, and adults with the knowledge and skills needed to obtain a well-paying job on Kaua'i.*

- (d) Consider schools as community resources for learning about specialized environmental, cultural, and historic subjects related to Kaua'i and each of its communities. Schools should also assume important community functions such as recreational centers, meeting facilities, and emergency shelters.*

Island School is Kaua'i's largest private, non-sectarian, independent school accommodating Grades Pre-K through 12, with a current enrollment of approximately 370 students. Island School's mission is to prepare its students to live productive, fulfilling lives as confident, responsible life-long learners and contributing members of society; to express fully the talents of its faculty and administration through a challenging curriculum that prepares students for successful higher education; and, to provide a safe, nurturing environment that fosters creativity, critical thinking, initiative, and respect for self and others. The proposed update of the Island School master plan will accommodate additional campus facilities for future increase in its student enrollment to approximately 500 students.

Specific facilities within the Island School campus are made available for community functions. Approximately 35 organizations currently utilize facilities at the school, 27 of which do so on a recurring basis. The proposed updated master plan improvements will provide additional facilities that may be available for community functions.

4.5 County of Kaua'i Līhu'e Development Plan

The County's Līhu'e Development Plan, adopted by County ordinance in 1976, provides physical, social and economic measures which relate specifically to these communities. The Līhu'e Development Plan land use designation for the Petition Area is "Agriculture" (see Figure 4-3). As indicated in the Development Plan's existing land use description, Agriculture is predominantly sugar cane and covers much of the lands not in urban use.

The Līhu'e Plantation Company, Ltd. ceased sugar cane cultivation in the area in the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) encompassing the western and central portions of the site, has been developed into the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. No intensive agricultural activities presently occur within the Petition Area. The Petition Area is rendered unsuitable for intensive agricultural uses

given its use as a school since 1990. Given the existing and proposed campus improvements within the Petition Area, it is highly unlikely that the land will revert to agricultural use in the future.

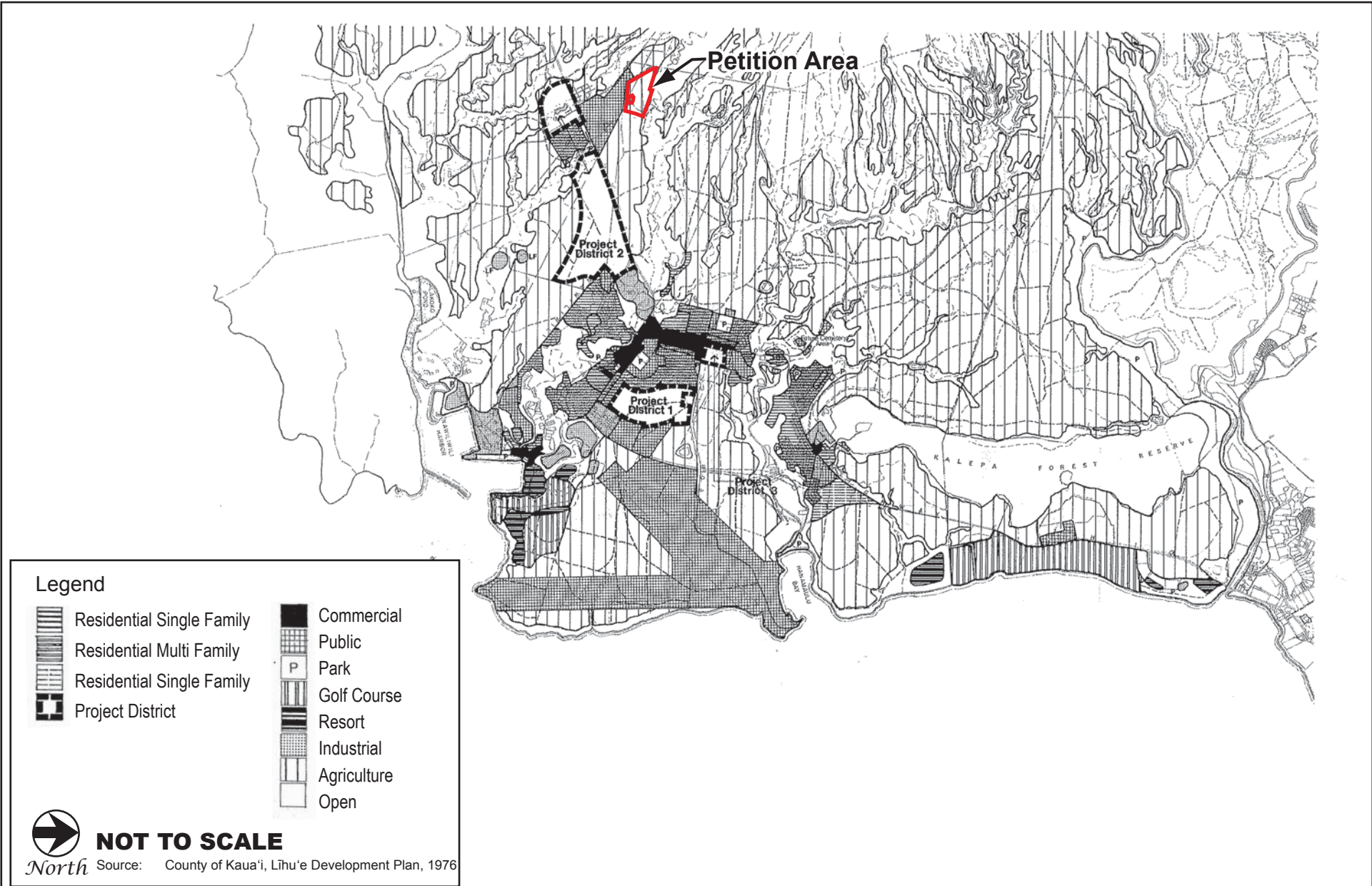
4.6 County of Kaua'i Comprehensive Zoning Ordinance

The County's Comprehensive Zoning Ordinance (CZO) establishes procedures for the division of the County into land use districts, and creates regulations for the types, size, placement, and control of structures within various zoning district classifications. The CZO also delineates the respective types of permitted uses and the development that can take place in those zoning districts.

The zoning designations for the Petition Area are Agriculture District (A) and Open District (O) (see Figure 4-4). A Use Permit will be required since the proposed school improvements are not generally permitted within the Agriculture District (A) and Open District (O). A Class IV Zoning Permit will be required because a Use Permit is being sought. The application for Use Permit and Class IV Zoning Permit is processed by the County Planning Department and approved by the County Planning Commission.

4.7 County of Kaua'i Special Management Area

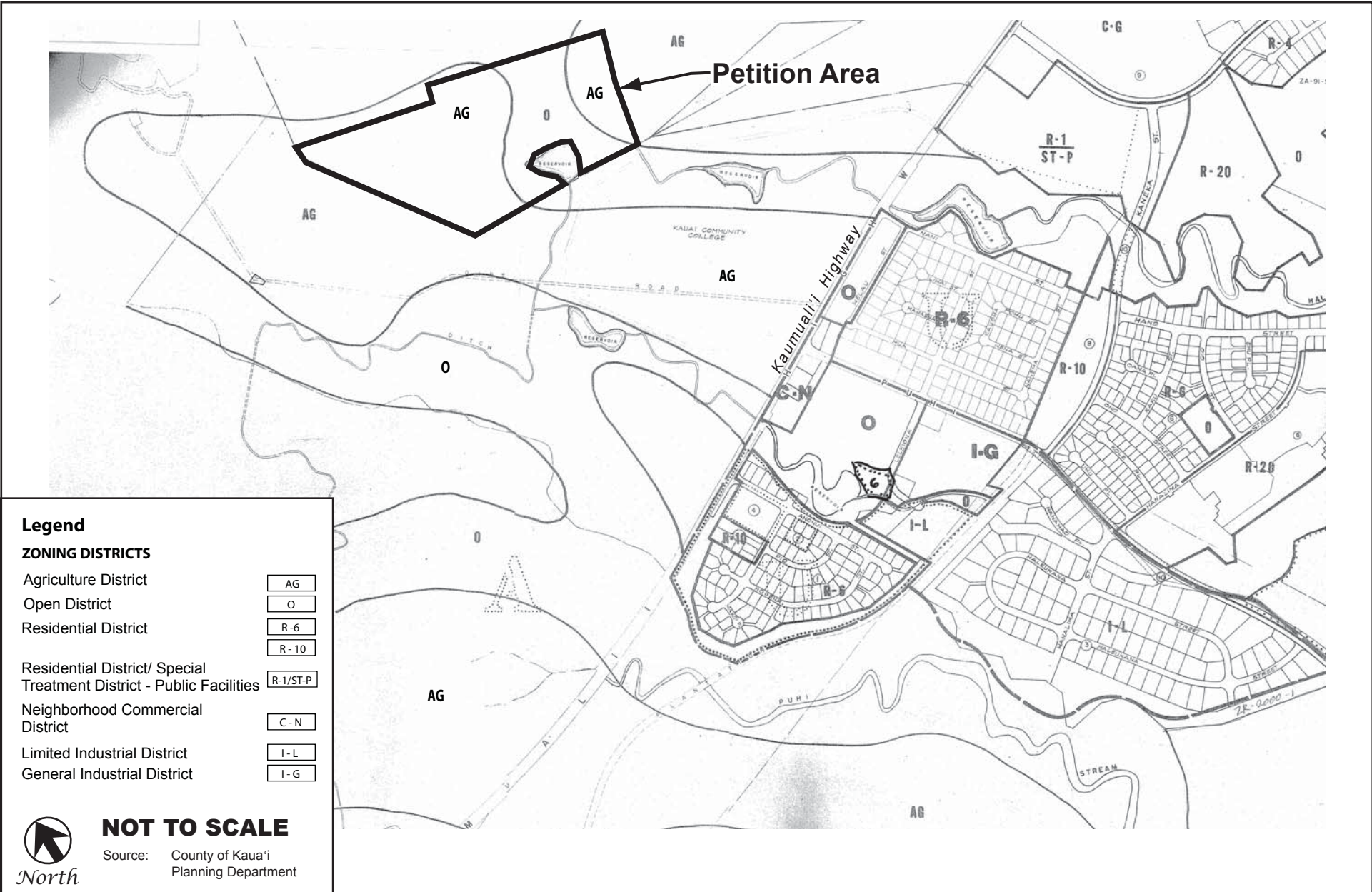
The Hawai'i Coastal Zone Management (CZM) Act (Chapter 205A, HRS) is the basis of the Hawai'i CZM Program as discussed previously in Section 4.3. The Act establishes objectives, policies and guidelines upon which all counties within the State have structured specific legislation which designated Special Management Areas (SMA). Any development located within the SMA requires a County-issued SMA permit, which on Kaua'i is administered by the County Planning Department. The Petition Area is located outside of the SMA boundaries and, therefore, does not require a SMA Use Permit.



Island School Updated Master Plan

LĪHU'Ē DEVELOPMENT PLAN LAND USE MAP

FIGURE



Island School Updated Master Plan

COUNTY OF KAUA'I ZONING MAP

FIGURE

5. ALTERNATIVES TO THE PROPOSED ACTION

5.1 No Action Alternative

Under the No Action Alternative, Island School would continue to operate in its current capacity with regard to campus facilities and student enrollment. Without the proposed updated master plan improvements, Island School would not be able to accommodate the projected future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. Further, the Island School campus would continue to be designated within the State Agricultural District and the County General Plan's Agriculture designation.

The No Action Alternative would also preclude all other short-term and long-term beneficial and adverse physical, environmental and socio-economic impacts described in this EA.

(This page is intentionally left blank)

6. REQUIRED PERMITS AND APPROVALS

The following is a list of permits and approvals that may be required prior to construction and development of the proposed project.

State of Hawai'i

Department of Business, Economic Development and Tourism, Land Use Commission

- State Land Use District Boundary Amendment

Department of Health

- National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity

Department of Land and Natural Resources, Historic Preservation Division

- Chapter 6E, HRS, Historic Preservation

County of Kaua'i

Planning Department

- County General Plan Amendment
- Use Permit
- Class IV Zoning Permit

Department of Public Works

- Grading Permit
- Building Permit
- Drainage System Requirements

Department of Water:

- Water and Water System Requirements

Utility Companies

- Utility Service Requirements

(This page is intentionally left blank)

7. NOTICE OF DETERMINATION

A. Petitioner

Island School
3-1875 Kaumuali'i Highway
Līhu'e, Kaua'i, Hawai'i 96766-9597

Contact: Mr. David Pratt, Vice President of Island School
Phone: (808) 651-5029
Facsimile: (808) 245-4814

B. Approving Agency

County of Kaua'i Planning Department
4444 Rice Street, Suite 473
Līhu'e, Hawai'i 96766

C. Description of the Proposed Action

Island School is proposing an update of its master plan to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. An increase of approximately 22 full-time equivalent (FTE) faculty and staff, to the current 62 FTE members, for a total of 84 FTE members, will be required for the future increase in student enrollment. The proposed master plan for the 38.448-acre campus updates the current master plan approved through a Special Permit, Use Permit and Class IV Zoning Permit by the County of Kaua'i (County) Planning Commission on April 26, 2005.

The proposed updated master plan includes new, renovated and expanded classroom buildings; expanded administration facility and visual arts facility; new facilities, including science building, campus center, dining facility, auditorium and stage, arts education building, back-of-house building and courtyard, robotics shed, outdoor science area, maintenance facility, and informal gathering areas; playground and sports facilities, including physical education (P.E.) facilities, track and football field, soccer field, softball field, and outdoor swimming pool; internal loop road with bus parking spaces; school and community drop-off areas; and, additional parking spaces.

The Petitioner is seeking to amend the County General Plan Land Use Map for the Island School Campus (Petition Area) from the Agriculture designation to the Urban Center designation, and then to reclassify the Petition Area from the State Agricultural District to the State Urban District. The reclassification of the Petition Area will allow the improvements in the proposed updated Island School master plan to be implemented without a State Special Permit. The need to amend the Petition Area from the County General Plan Agriculture designation to the Urban Center designation, and to reclassify from the State Agriculture District to the Urban District, is to be more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaumuali'i Highway.

D. Determination and Reasons Supporting Determination

The Island School Updated Master Plan Draft EA was filed with the State Office of Environmental Quality Control (OEQC) and published in the November 23, 2012 publication of *The Environmental Notice*. A total of 10 comment letters were received during the 30-day public review period which ended on December 24, 2012. Based on the significance criteria set forth in Section 11-200-12 of Title 11, Chapter 200, Administrative Rules, State Department of Health, the County of Kaua'i Planning Department has determined that the proposed project will not have a significant effect on the environment, and that a Finding of No Significant Impact (FONSI) will be filed with the State Office of Environmental Quality Control (OEQC).

The findings supporting this determination are described below according to these significance criteria.

1) Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;

Development of the proposed project will require an irrevocable commitment of land, energy, labor, and materials for construction. The principal irrevocable commitment of a natural resource that would result from the project is the development of land for Island School's proposed updated master plan improvements. The Petition Area was previously in sugar cane cultivation by the L'hu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) encompassing the western and central portions of the site, has been developed as the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The remaining 8.448 acres comprising the north-central and eastern portions of the Petition Area are currently undeveloped and vegetated with forest, shrubland, and grassland areas. No intensive agricultural activities presently occur within the Petition Area. The Petition Area is rendered unsuitable for intensive agricultural uses given its use as a school since 1990. Given the existing and proposed campus improvements within the Petition Area, it is highly unlikely that the land will revert to agricultural use in the future.

No listed, candidate, or proposed threatened or endangered botanical and fauna species under either the Federal or State of Hawai'i endangered species statutes will be disturbed as a result of the proposed project. The recommended mitigation measures discussed in Sections 3.5 and 3.6 will be implemented to minimize or prevent any impacts on botanical and faunal species.

During the field inspection survey conducted in conjunction with the archaeological literature review for the Petition Area, a total of four historic surface features related to the L'hu'e Plantation Company, Ltd.'s plantation-era infrastructure were observed. The surface features consist of a reservoir located on a separate parcel adjacent to the south-central portion of the Petition Area (CSH 1), and three irrigation ditches (CSH 2, CSH 3, and CSH 4), two of which are associated with the adjacent reservoir. All of the surface features are currently in use. Based on an evaluation for significance according to the criteria established for the Hawai'i Register of Historic Places, no additional work appears to be necessary for the four features.

The proposed project improvements are not anticipated to have an adverse effect on the historic features related to plantation-era infrastructure. No project improvements are proposed to be constructed within or in the immediate vicinity of the plantation-era infrastructure. While no

additional work appears to be necessary, consultation with the SHPD is being conducted to determine mitigation, if any, which may be appropriate for the plantation infrastructure features that have been recommended for no further work.

Should any previously unidentified burial, archaeological or historic sites be found during the course of construction of the proposed project, the Petitioner will stop work in the immediate vicinity and the SHPD will be notified immediately. The significance of these finds will then be determined and appropriate mitigation measures will be approved by the SHPD and, as necessary, the Kaua'i/Ni'ihau Islands Burial Council, as appropriate. Subsequent work will proceed after SHPD authorization has been received and mitigative measures have been implemented.

Aside from the four historic surface features related to the L'hu'e Plantation Company, Ltd.'s plantation-era infrastructure, no traditional Hawaiian sites or ancient trail systems were found within the Petition Area during the field inspection survey. Based on the literature review and field inspection survey, no burials are anticipated to be found within the Petition Area. Based on these findings, development of the proposed project will have minimal or no impact upon native Hawaiian cultural resources, beliefs and practices.

2) Curtails the range of beneficial uses of the environment;

The intention of the project is to commit the Petition Area to the proposed use over the long-term. Upon amendment of the Petition Area from the County General Plan Agriculture designation to the Urban Center designation, and reclassification from the State Agricultural District to the State Urban District, beneficial uses of the Petition Area and environment would not be curtailed since the proposed project would be an appropriate use of the site.

3) Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344 HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;

The proposed project's relationship to the environmental policies, goals, and guidelines set forth in Chapter 344, HRS, is assessed through this EA process.

As the Petition Area does not contain a unique botanical habitat, no significant impacts on flora are anticipated from the construction and development of the proposed project. The proposed campus expansion areas are devoid of botanical resources that would merit special concern. All species are common to lowland windward Kaua'i, nearly exclusively non-native, and not requiring or deserving of preservation within the Petition Area. Therefore, it is not expected that development of the proposed project improvements will result in deleterious impacts to any plants species currently listed as endangered, threatened, or proposed for listing under either the Federal or State of Hawai'i endangered species statutes.

The principal potential impact that the proposed project improvements poses to Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels is the increased threat that birds will be downed after becoming disoriented by outdoor lighting associated with possible nighttime construction activity, and following build-out with exterior lighting associated with the structures and appurtenances that are built within the Petition Area. Should nighttime work be

required in conjunction with the project construction, and during operation of the proposed project, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally-flying Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels with external lights and man-made structures.

The principal potential impacts that the proposed project improvements pose to Nēnē are during construction, and following build-out with the increased student enrollment and associated school activities. If construction activity is planned to occur within the Petition Area during the Nēnē nesting season, which typically runs from October through March on Kaua'i, the Petition Area should be surveyed by a qualified biologist prior to the start of construction, to determine if any active Nēnē nesting activity is occurring on the site. If such nesting does occur during construction, it is recommended that a Nēnē monitor be on site during such activity to ensure that no harm occurs to the birds.

Due to the likelihood that the endangered Nēnē will utilize resources within the Petition Area, and the Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels could potentially fall onto the Petition Area during the construction phase of the project, it is recommended that an endangered species awareness program be developed to include general information on the endangered species act and protected species; specific restrictions that will be in force on the job site to protect endangered species; and protocol on who, and how job site personnel will respond to any downed or injured endangered species that may occur on the site. All construction personnel should be required to be familiar with the program, and its guidelines, restrictions and protocols to be followed.

The principal potential impact that the proposed project improvements pose to Hawaiian hoary bats is during the clearing and grubbing phases of the project. Areas of dense vegetation are likely used to some degree by roosting bats. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation along the periphery of the Petition Area should not occur between June 1 to September 15, when bats may be carrying young and potentially could be at risk by such clearing activities.

As the Petition Area is located approximately 2.7 miles inland (northwest) of the coastline, the proposed project will not affect scenic resources or public views to and along the shoreline. The new buildings to be constructed within the Petition Area are proposed to be mostly located within the central portion of the campus and visually will be an extension of the existing facilities. Any visual impacts of the proposed project from the surrounding areas will be minimized through appropriate architectural design criteria and compliance with the applicable development standards of the County's Comprehensive Zoning Ordinance (CZO) relative to building height, setbacks, etc. The visual environment of the northern and eastern portions of the Petition Area will mostly remain open with athletic fields and undeveloped areas. Appropriate landscaping will be provided along the southwestern and southern boundaries of the Petition Area to visually screen the campus buildings from the nearby areas.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

During construction of the proposed project, a trash management and recycling program will be developed and implemented to minimize solid waste disposal at the County's Kekaha Landfill. In an effort to reduce the amount of solid waste to be generated upon development of the project, Island School will continue with implementation of its on-campus recycling program, and food waste generated by the school's food services will continue to be provided to pig farmers. Composting of greenwaste will be employed for the project's landscaped areas.

4) Substantially affects the economic, social welfare, or cultural practices of the community or State;

In the short term, the proposed project will bring about positive benefits to the local economy. This would include increased expenditures for construction, construction-related jobs and tax revenue. Direct economic benefits will result from construction expenditures both through the purchase of material from local suppliers and through the employment of local labor, thereby stimulating that sector of the economy. Indirect economic benefits may include benefits to local retailing businesses resulting from construction activities.

In the long-term, the project will contribute toward positive economic benefits through the employment of labor associated with the increased faculty and staff associated with the updated master plan improvements. An increase of approximately 22 FTE faculty and staff, to the current 62 FTE members, for a total of 84 FTE members, will be required for the future increase in the student enrollment to approximately 500 students.

Currently, approximately 35 organizations utilize facilities at Island School, 27 of which do so on a recurring basis. The proposed updated master plan improvements will provide additional facilities that may be available for use by organizations. This sharing of facilities reduces the demand for construction of new facilities to serve these organizations.

Aside from the four historic surface features related to the Līhu'e Plantation Company, Ltd.'s plantation-era infrastructure, no traditional Hawaiian sites or ancient trail systems were found within the Petition Area during the field inspection survey. Based on the literature review and field inspection survey, no burials are anticipated to be found within the Petition Area. Based on these findings, development of the proposed project will have minimal or no impact upon native Hawaiian cultural resources, beliefs and practices.

5) Substantially affects public health;

The proposed Project is not anticipated to adversely affect public health.

Construction activities associated with the proposed project will create some adverse short-term impacts such as unavoidable noise impacts and air quality impacts from soil excavation and grading activities in the vicinity of the Petition Area. Unavoidable construction noise impacts on nearby land uses in the immediate vicinity of the proposed project will be mitigated to some degree by complying with the provisions of the State DOH Administrative rules, Title 11, Chapter 46, Community Noise Control. Potential air quality impacts during construction of the proposed project will be mitigated by complying with the State DOH Administrative Rules, Title 11, Chapter 60, Air Pollution Control.

6) Involves substantial secondary impacts, such as population changes or effects on public facilities;

The proposed project is not expected to result in substantial secondary impacts, such as population changes. The projected increase in student enrollment of approximately 130 students, and the 22 FTE faculty and staff that will be required for the increased student enrollment, are anticipated to be mostly residents currently residing on Kaua'i. Any of these students or faculty and staff members that may be from off-Island would be minimal. As the proposed project is an update of Island School's current master plan, there would be no resulting substantial secondary impacts on public facilities.

7) Involves a substantial degradation of environmental quality;

The proposed Project is not anticipated to result in a substantial degradation of environmental quality.

Construction activities associated with the proposed project will create some adverse short-term impacts such as temporary disruption of traffic, unavoidable noise impacts, and air quality impacts from soil excavation and grading activities in the vicinity of the Petition Area. The construction contractor(s) will be required to mitigate potential vehicular traffic impacts through appropriate traffic control measures. Unavoidable construction noise impacts on nearby land uses in the immediate vicinity of the proposed project will be mitigated to some degree by complying with the provisions of the State DOH Administrative rules, Title 11, Chapter 46, Community Noise Control. Potential air quality impacts during construction of the proposed project will be mitigated by complying with the State DOH Administrative Rules, Title 11, Chapter 60, Air Pollution Control.

Potential impacts to the quality of nearby surface and near shore coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

In the long-term, no significant air quality, noise, or water quality impacts are anticipated from the operation of the proposed project. Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

8) Is individually limited but cumulatively has a considerable effect upon the environment or involves a commitment for larger actions;

The proposed project is not anticipated to have a significant adverse cumulative effect on the environment, nor will it involve a commitment for larger actions. The project involves an update

of the Island School master plan to accommodate additional campus facilities for future increase in its student enrollment, currently at approximately 370 students, to approximately 500 students. Since 1990, approximately 30 acres of the 38.448-acre Petition Area has been developed as the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The proposed updated master plan improvements will occur entirely within the Petition Area. The potential for cumulative impacts is limited to traffic impacts, which is based on Island School's and the adjacent Kaua'i Community College's student enrollment projections. Further, in the traffic impact assessment conducted for the proposed project, a growth factor of 1.05 was applied to the existing through traffic demands along Kaumuali'i Highway to achieve the projected Year 2020 traffic demands. The results indicate that traffic operations in the vicinity of Island School with the implementation of its updated master plan are expected to operate at levels of service similar to Year 2020 without project conditions despite the addition of site-generated traffic to the surrounding roadways.

9) Substantially affects a rare, threatened or endangered species, or its habitat;

As the Petition Area does not contain a unique botanical habitat, no significant impacts on flora are anticipated from the construction and development of the proposed project. No plant species currently listed as endangered, threatened, or proposed for listing under either the Federal or State of Hawai'i endangered species programs were recorded as growing naturally within the Petition Area.

No listed, candidate, or proposed threatened or endangered avian or mammalian species under either the Federal or State endangered species statutes will be disturbed or adversely impacted as a result of the proposed project. The recommended mitigation measures discussed in Sections 3.5 and 3.6 will be implemented to minimize or prevent any impacts on botanical and faunal species.

The principal potential impact that the proposed project improvements poses to Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels is the increased threat that birds will be downed after becoming disoriented by outdoor lighting associated with possible nighttime construction activity, and following build-out with exterior lighting associated with the structures and appurtenances that are built within the Petition Area. Should nighttime work be required in conjunction with the project construction, and during operation of the proposed project, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally-flying Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels with external lights and man-made structures.

The principal potential impacts that the proposed project improvements pose to Nēnē are during construction, and following build-out with the increased student enrollment and associated school activities. If construction activity is planned to occur within the Petition Area during the Nēnē nesting season, which typically runs from October through March on Kaua'i, the Petition Area should be surveyed by a qualified biologist prior to the start of construction, to determine if any active Nēnē nesting activity is occurring on the site. If such nesting does occur during construction, it is recommended that a Nēnē monitor be on site during such activity to ensure that no harm occurs to the birds.

Due to the likelihood that the endangered Nēnē will utilize resources within the Petition Area, and the Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels could potentially fall onto the Petition Area during the construction phase of the project, it is recommended that an endangered species awareness program be developed to include general information on the endangered species act and protected species; specific restrictions that will be in force on the job site to protect endangered species; and protocol on who, and how job site personnel will respond to any downed or injured endangered species that may occur on the site. All construction personnel should be required to be familiar with the program, and its guidelines, restrictions and protocols to be followed.

The principal potential impact that the proposed project improvements pose to Hawaiian hoary bats is during the clearing and grubbing phases of the project. Areas of dense vegetation are likely used to some degree by roosting bats. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation, including woody plants beyond 15 feet, along the periphery of the Petition Area should not occur between June 1 to September 15, when bats may be carrying young and potentially could be at risk by such clearing activities.

There is no Federally delineated Critical Habitat present within or adjacent to the Petition Area.

10) Detrimentially affects air or water quality or ambient noise levels;

During construction, dust and noise from construction activities will be unavoidable. Short-term construction noise impacts on nearby land uses in the immediate vicinity of the proposed project will be mitigated to some degree by complying with the provisions of the State DOH Administrative Rules, Title 11, Chapter 46, Community Noise Control. Potential air quality impacts during construction of the proposed project will be mitigated by complying with the State DOH Administrative Rules, Title 11, Chapter 60, Air Pollution Control.

No significant air quality impacts are anticipated with the development of the proposed project. The ambient air quality levels would be most affected by vehicular and emissions in the form of CO generated by project-related traffic and development, although the elevated concentrations are anticipated to be nominal and dissipate.

No significant impacts on ambient noise levels are anticipated from the development of the proposed project. Ambient noise levels in the vicinity of the Petition Area will increase slightly as a result of the associated minimal increase in vehicular traffic generated by the proposed project. Operation of the proposed project will potentially generate slightly increased noise during school hours due to additional students, faculty, and school and service-related activities.

Potential impacts to the quality of nearby surface and near shore coastal waters during construction of the proposed project improvements will be mitigated by adherence to State and County water quality regulations governing grading, excavation, and stockpiling. A NPDES General Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs, such as minimizing time of exposure between construction and re-vegetation, and implementing erosion control measures such as silt fences and sediment basins.

Following construction, the proposed project improvements will increase impervious surface areas within the Petition Area. This will not, however, result in adverse effects from storm runoff to adjacent and downstream areas. New drainage improvements, which may include drain lines, grass swales, and culverts, will be provided in conjunction with the proposed project.

11) Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

The Petition Area is not located within a flood hazard zone. According to the FIRM prepared by the FEMA, the Petition Area is located within Zone "X", defined as "Areas determined to be outside the 0.2% annual chance floodplain". The Petition Area is not within a tsunami inundation area as it is located approximately 2.7 miles inland (northwest) from the shoreline, and at elevations ranging from approximately 350 to 400 feet above msl.

12) Substantially affects scenic vistas and viewplanes identified in county or state plans or studies;

The proposed project will not affect scenic vistas and viewplanes identified in County or State plans or studies. As the Petition Area is located approximately 2.7 miles inland (northwest) of the coastline, the proposed project will not affect scenic resources or public views to and along the shoreline. The Petition Area is not visible from public vantage points due to its inland location and distance from Kaumuali'i Highway, the nearest public roadway. The Petition Area is located approximately 0.4-mile mauka of Kaumuali'i Highway at its closest point, and is visually buffered by vegetation and the adjacent Kaua'i Community College campus located between the southern boundary of the site and the Highway. The visual environment of the remaining areas surrounding the Petition Area is of expansive undeveloped, vegetated lands, and agricultural cultivation.

13) Requires substantial energy consumption;

The proposed project will consume a relatively insignificant amount of energy in the course of construction and development. Island School will continue to employ sustainable measures to promote renewable energy sources and energy efficiency. The 200 kW solar photovoltaic facility within the Petition Area will generate clean, renewable solar energy to meet the daytime needs of the Island School campus, resulting in a reduction of fossil fuel energy by more than 50 percent. Energy demand and consumption will be further reduced through the use of solar and efficient, low-consumption lighting fixtures and equipment, such as Energy Star rated appliances. The campus buildings will be designed for natural ventilation to take advantage of the trade winds, including use of ceiling fans, and skylights will be utilized to allow natural light to illuminate interior spaces.

(This page is intentionally left blank)

8. REFERENCES

1. County of Kaua'i Civil Defense Agency. *Central Kaua'i Shelters*. Internet. Available at: http://www.kauai.gov/portals/0/Civil_Defense/Shelters/centralshelters.htm.
2. County of Kaua'i Civil Defense Agency. *South Kaua'i Sirens*. Internet. Available at: <http://www.kauai.gov/Government/Departments/CivilDefenseAgency/KauaiSirenLocations/SouthKauaiSirens/tabid/80/Default.aspx>.
3. *County of Kaua'i Multi-Hazard Mitigation Plan, Update 2009*.
4. County of Kaua'i Planning Department. *Kaua'i General Plan*. November 2000.
5. County of Kaua'i Planning Department. *Līhu'e Development Plan*. 1976.
6. Federal Emergency Management Agency. *Flood Insurance Rate Map Community Panel 1500020 307E and 309E*. September 16, 2005.
7. Hawai'i Cooperative Park Service Unit, National Park Service for the State of Hawai'i Commission on Water Resource Management. *Hawai'i Stream Assessment, A Preliminary Appraisal of Hawai'i's Stream Resources, Report R84*. December 1990.
8. *Island School at a Glance*. Internet. Available at: <http://www.ischool.org/AtAGlance/ataglance.html>.
9. Leanora Kaiaokamalie, County of Kaua'i Planning Department. Personal Communication, October 10, 2012.
10. Macdonald, Gordon A., A.T. Abbott and Frank L. Peterson. *Volcanoes in the Sea, The Geology of Hawai'i*. Second Edition 1986.
11. State of Hawai'i Department of Land and Natural Resources Commission on Water Resource Management and the U.S. National Park Service, *Hawai'i Stream Assessment: A Preliminary Appraisal of Hawai'i's Stream Resources*, December 1990.
12. *State of Hawai'i Multi-Hazard Mitigation Plan, 2010 Update*.
13. United States Census Bureau. *Census 2000 Data for the State of Hawai'i*. Internet. Available at: <http://www.census.gov/census2000/states/hi.html>.
14. United States Department of Agriculture Soil Conservation Service. *Soil Survey of Islands of Kaua'i, O'ahu, Maui, Moloka'i, and Lāna'i, State of Hawai'i*, August 1972.
15. University of Hawai'i, Department of Geography. *Atlas of Hawai'i*. The University Press of Hawai'i, Honolulu, Third Edition 1998.
16. University of Hawai'i Department of Urban and Regional Planning, and University of Hawai'i Economic Research Organization. *County of Kaua'i Important Agricultural Lands Study*

Final Report – Second Draft. Prepared for the County of Kaua'i Planning Department. August 2011.

17. U.S. Fish and Wildlife Service, National Wetlands Inventory. Internet. Available at: <http://www.wetlands.fws.gov/>.
18. Wilson Okamoto Corporation. *Hawai'i Water Plan, Water Resource Protection Plan.* Prepared for the State of Hawai'i Department of Land and Natural Resources, Commission on Water Resource Management. June 2008.
19. Wilson Okamoto Corporation. *Kaua'i Community College Redesignation to Urban District Final Environmental Assessment.* Prepared for the University of Hawai'i Community Colleges. November 2012.

9. CONSULTATION

9.1 Pre-Assessment Consultation

The following agencies were consulted during the pre-assessment phase of the Draft EA. Those who formally replied with verbal or written comments are indicated by an asterisk (*). All written comments and responses are reproduced herein.

Federal

- U.S. Army Corps of Engineers, Civil Works Technical Branch
- U.S. Army Corps of Engineers, Regulatory Branch
- * U.S. Geological Survey
- * U.S. Fish and Wildlife Service
- * U.S. Department of Agriculture, Natural Resources Conservation Service

State of Hawai'i

- Department of Agriculture
- * Department of Accounting and General Services
- Department of Business, Economic Development and Tourism
- * Department of Business, Economic Development and Tourism, Land Use Commission
- * Department of Business, Economic Development and Tourism, Office of Planning
- * Department of Defense
- Department of Education
- Department of Health
- Department of Health, Office of Environmental Quality Control
- * Department of Health, Environmental Planning Office
- Department of Health, Environmental Management Division
- Department of Health, Clean Water Branch
- * Department of Health, Wastewater Branch
- Department of Land and Natural Resources
- Department of Land and Natural Resources, Land Division
- * Department of Land and Natural Resources, Land Division, Kaua'i District
- Department of Land and Natural Resources, Division of Forestry and Wildlife
- Department of Land and Natural Resources, Division of Forestry and Wildlife, Kaua'i District
- * Department of Land and Natural Resources, Historic Preservation Division
- * Department of Transportation
- Office of Hawaiian Affairs
- University of Hawai'i at Mānoa, Environmental Center
- University of Hawai'i Community Colleges, Kaua'i Community College

County of Kaua'i

- Planning Department
- Department of Public Works, Engineering Division
- Department of Public Works, Building Division
- * Department of Public Works, Division of Solid Waste Management
- * Department of Public Works, Wastewater Management Division
- Department of Water
- Department of Parks and Recreation

County of Kaua'i (continued)

- Transportation Agency
- * Civil Defense Agency
- Office of Economic Development
- Police Department
- * Fire Department

Utilities

- Kaua'i Island Utility Cooperative
- Hawaiian Telcom
- Oceanic Time Warner Cable

9.2 Draft Environmental Assessment Consultation

The following agencies and organizations were consulted during the public review period of the Draft EA. Those who formally replied are indicated by an asterisk (*). All written comments and responses are reproduced herein.

Federal

- U.S. Army Corps of Engineers, Civil Works Technical Branch
- U.S. Army Corps of Engineers, Regulatory Branch
- U.S. Geological Survey
- * U.S. Fish and Wildlife Service
- U.S. Department of Agriculture, Natural Resources Conservation Service

State of Hawai'i

- Department of Agriculture
- * Department of Accounting and General Services
- Department of Business, Economic Development and Tourism
- Department of Business, Economic Development and Tourism, Land Use Commission
- * Department of Business, Economic Development and Tourism, Office of Planning
- Department of Defense
- * Department of Education
- Department of Health
- Department of Health, Office of Environmental Quality Control
- Department of Health, Environmental Planning Office
- Department of Health, Environmental Management Division
- Department of Health, Clean Water Branch
- * Department of Health, Wastewater Branch
- Department of Land and Natural Resources
- * Department of Land and Natural Resources, Land Division
- Department of Land and Natural Resources, Land Division, Kaua'i District
- Department of Land and Natural Resources, Division of Forestry and Wildlife
- Department of Land and Natural Resources, Division of Forestry and Wildlife, Kaua'i District
- Department of Land and Natural Resources, Historic Preservation Division
- * Department of Transportation
- Department of Transportation, Highways Division, Kaua'i District
- Office of Hawaiian Affairs

State of Hawai'i (continued)

University of Hawai'i at Mānoa, Environmental Center
University of Hawai'i Community Colleges, Kaua'i Community College

County of Kaua'i

Honorable Mayor Bernard P. Carvalho, Jr.
Office of the County Clerk
Council Chair Jay Furfaro
Council Vice Chair JoAnn Yukimura
Councilmember Nadine Nakamura
Councilmember Tim Bynum
Councilmember Dickie Chang
Councilmember KipuKai Kualii
Councilmember Mel Rapozo
Planning Department
Department of Public Works, Engineering Division
Department of Public Works, Building Division
* Department of Public Works, Division of Solid Waste Management
* Department of Public Works, Wastewater Management Division
* Department of Water
Department of Parks and Recreation
Transportation Agency
Civil Defense Agency
Office of Economic Development
Police Department
Fire Department

Utilities

Kaua'i Island Utility Cooperative
Hawaiian Telcom
Oceanic Time Warner Cable

Others

Hawai'i State Library
Kaua'i Community College Library
Līhu'e Public Library

(This page is intentionally left blank)

Pre-Assessment Consultation Correspondence



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Pacific Islands Water Science Center
677 Ala Moana Blvd., Suite 415
Honolulu, Hawaii 96813
Phone: (808) 587-2400/Fax: (808) 587-2401

August 31, 2012

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

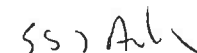
Dear Mr. Matsukawa:

Subject: Pre-Assessment Consultation/Draft Environmental Assessment (EA), Island School,
Tax Map Key: (4) 3-8-002: 016, Puhi, Lihu'e District, island of Kaua'i, Hawai'i

Thank you for forwarding the subject Pre-Assessment Consultation/Draft EA for review and comment by the staff of the U.S. Geological Survey Pacific Islands Water Science Center. We regret however, that due to prior commitments and lack of available staff, we are unable to review this document.

We appreciate the opportunity to participate in the review process.

Sincerely,


Stephen S. Anthony
Center Director



1907 South Beretania Street
Arlesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Stephen S. Anthony, Center Director
United States Department of the Interior
U.S. Geological Survey
Pacific Islands Water Science Center
677 Ala Moana Boulevard, Suite 415
Honolulu, Hawai'i 96813

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Anthony:

Thank you for your letter dated August 31, 2012 regarding the subject project. We acknowledge that your department was unable to review this document due to prior commitments and lack of available staff.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,


Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850



SEP 14 2012

In Reply Refer To:
2012-TA-0424

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii 96826

Subject: Technical Assistance for the Island School Master Plan Draft Environmental Assessment, Kauai

Dear Mr. Matsukawa:

The U.S. Fish and Wildlife Service (Service) received your letter on August 21, 2012, requesting our comments for the preparation of a draft Environmental Assessment (EA) for the proposed update to the Island School Master Plan. The Island School campus is located on a 38.5-acre parcel in Puhi on the island of Kauai [TMK (4) 3-8-002:016]. The update to the school's Master Plan will reclassify the campus parcel from State Agricultural District to State Urban District and amend the County of Kauai General Plan Land Use Map from the 'Agricultural' to 'Urban Center' designation. The purpose of this reclassification is to allow improvements within the Island School Master Plan to be implemented without a State Special Permit. The updated Master Plan includes new and expanded classrooms and facilities, recreational sport fields, outdoor pool, residences, a 200 kilowatt solar facility, 145 new parking spaces and additional infrastructure.

We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program and the Hawaii GAP Program. Our information indicates that the federally endangered Hawaiian hoary bat (Lasiurus cinereus semotus) may be present in the vicinity of the proposed facility. Additionally, the federally threatened Newell's shearwater (Puffinus auricularis newellii), endangered Hawaiian petrel (Pterodroma sandwichensis), and a candidate for listing, the band-rumped storm-petrel (Oceanodroma castro) (collectively referred to as seabirds), may fly over the project area when traversing between the ocean and mountainous breeding colonies. We offer the following recommendations to assist you in the preparation of your draft EA:

Hawaiian Hoary Bat

The Hawaiian hoary bat roosts in both exotic and native woody vegetation and, while foraging, will leave young unattended in "nursery" trees and shrubs when they forage. If trees or shrubs

Mr. Earl Matsukawa

suitable for bat roosting are cleared during the breeding season, there is a risk that young bats could inadvertently be harmed or killed. To minimize impacts to the endangered Hawaiian hoary bat, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15). Site clearing should be timed to avoid disturbance to Hawaiian hoary bats in the project area.

Seabirds

Seabirds, including the Newell's shearwater, Hawaiian petrel, and band-rumped storm-petrel, fly at night and are attracted to artificially-lighted areas resulting in disorientation and subsequent fallout due to exhaustion. Seabirds are also susceptible to collision with objects that protrude above the vegetation layer, such as utility lines, guy-wires, and communication towers. Additionally, once grounded, they are vulnerable to predators and are often struck by vehicles along roadways. To reduce potential impacts to seabirds, we recommend the following minimization measures be incorporated into your final EA:

- Construction activities should only occur during daylight hours. Any increase in the use of nighttime lighting, particularly during peak fallout period (September 15 through December 15), could result in additional seabird injury or mortality.
If lights cannot be eliminated due to safety or security concerns, then they should be positioned low to the ground, be motion-triggered, and be shielded and/or full cut-off. Effective light shields should be completely opaque, sufficiently large, and positioned so that the bulb is only visible from below.

We appreciate your efforts to conserve protected species. If you have questions regarding this letter, please contact Michelle Bogardus, Consultation and Habitat Conversation Planning Program (phone: 808-792-9437; fax: 808-792-9581).

Sincerely,

[Signature]
Loyal Mehrhoff
Field Supervisor





1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Loyal Mehrhoff, Field Supervisor
United States Department of the Interior
Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawai'i 96850

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Mehrhoff:

Thank you for your letter dated September 14, 2012 (Ref. 2012-TA-0424) regarding the subject project. We acknowledge your statement that the federally endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) may be present in the project vicinity, and that the federally threatened Newell's Shearwater (*Puffinus auricularis newelli*), endangered Hawaiian Petrel (*Pterodroma sandwichensis*), and Band-rumped Storm Petrel (*Oceanodroma castro*), a candidate for listing, may fly over the project area. An avian and terrestrial mammalian survey was conducted for the project and will be included in the Draft EA. The Draft EA will include a discussion on the above species and potential mitigation measures that could minimize the risk of harming these species. Specifically:

1. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation along the periphery of the Petition Area should not occur between May 15 and July 15, when bats may be carrying young and potentially could be at risk by such clearing activities.
2. Should nighttime work be required in conjunction with the project construction, and during operation of the proposed project, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally-flying Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm Petrels with external lights and man-made structures.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School



Natural Resources Conservation Service
 P.O. Box 50004 Rm. 4-118
 Honolulu, HI 96850
 808-541-2600

September 11, 2012

Mr. Earl Matsukawa, AICP
 Wilson Okamoto Corp.
 1907 S. Beretania St.
 Ste. 400
 Honolulu, HI 96826

Dear Mr. Matsukawa:

Thank you for providing NRCS the opportunity to review the status of lands that will be affected by the proposed additional campus facilities to be located at the Island School campus in Puhi, Kaua'i. The conversion of the land shown in Figure 1 (provided by you) from agricultural land to an area with structures that are not engaged in support of farming operation requires that a USDA form AD-1006 – Farmland Conversion Impact Rating – be completed as part of the Environmental Assessment process. A copy of this form and instructions are attached.

If you have any questions concerning the soils and related quality and suitability ratings for this project area, please contact Dr. Cynthia Stiles, Assistant State Soil Scientist, by phone (808) 541-2600 x129 or email at cynthia.stiles@hi.usda.gov.

Sincerely,

ANGEL FIGUEROA
 Director
 NRCS, Pacific Islands Area

Attachment

Cc: Lex Riggle, District Conservationist, Lihue, Hawaii
 Cynthia Stiles, Asst. State Soil Scientist, Honolulu, Hawaii

Helping People Help the Land
 An Equal Opportunity Provider and Employer

U.S. Department of Agriculture
FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request			
Name Of Project		Federal Agency Involved			
Proposed Land Use		County And State			
PART II (To be completed by NRCS)		Date Request Received By NRCS			
Does this site contain prime, unique, statewide or local important farmland? <i>(If no, the FPPA does not apply – do not complete additional parts of this form).</i>		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %	Amount Of Farmland As Defined in FPPA Acres: %		Date Land Evaluation Returned By NRCS	
Name Of Land Evaluation System Used	Name Of Local Site Assessment System				
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly					
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site		0.0	0.0	0.0	0.0
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland					
B. Total Acres Statewide And Local Important Farmland					
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted					
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value					
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value Of Farmland To Be Converted (Scale Of 0 to 100 Points)		0	0	0	0
PART VI (To be completed by Federal Agency) Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))		Maximum Points			
1. Area In Nonurban Use					
2. Perimeter In Nonurban Use					
3. Percent Of Site Being Farmed					
4. Protection Provided By State And Local Government					
5. Distance From Urban Builtup Area					
6. Distance To Urban Support Services					
7. Size Of Present Farm Unit Compared To Average					
8. Creation Of Nonfarmable Farmland					
9. Availability Of Farm Support Services					
10. On-Farm Investments					
11. Effects Of Conversion On Farm Support Services					
12. Compatibility With Existing Agricultural Use					
TOTAL SITE ASSESSMENT POINTS		160	0	0	0
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	0	0	0
Total Site Assessment (From Part VI above or a local site assessment)		160	0	0	0
TOTAL POINTS (Total of above 2 lines)		260	0	0	0
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input type="checkbox"/>			
Reason For Selection:					

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 – Federal agencies involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form.

Step 2 – Originator will send copies A, B and C together with maps indicating locations of site(s), to the Natural Resources Conservation Service (NRCS) local field office and retain copy D for their files. (Note: NRCS has a field office in most counties in the U.S. The field office is usually located in the county seat. A list of field office locations are available from the NRCS State Conservationist in each state).

Step 3 – NRCS will, within 45 calendar days after receipt of form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland.

Step 4 – In cases where farmland covered by the FPPA will be converted by the proposed project, NRCS field offices will complete Parts II, IV and V of the form.

Step 5 – NRCS will return copy A and B of the form to the Federal agency involved in the project. (Copy C will be retained for NRCS records).

Step 6 – The Federal agency involved in the proposed project will complete Parts VI and VII of the form.

Step 7 – The Federal agency involved in the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA and the agency's internal policies.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

Part I: In completing the "County And State" questions list all the local governments that are responsible for local land controls where site(s) are to be evaluated.

Part III: In completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities) that will cause a direct conversion.

Part VI: Do not complete Part VI if a local site assessment is used.

Assign the maximum points for each site assessment criterion as shown in § 658.5 (b) of CFR. In cases of corridor-type projects such as transportation, powerline and flood control, criteria #5 and #6 will not apply and will, be weighed zero, however, criterion #8 will be weighed a maximum of 25 points, and criterion #11 a maximum of 25 points.

Individual Federal agencies at the national level, may assign relative weights among the 12 site assessment criteria other than those shown in the FPPA rule. In all cases where other weights are assigned relative adjustments must be made to maintain the maximum total weight points at 160.

In rating alternative sites, Federal agencies shall consider each of the criteria and assign points within the limits established in the FPPA rule. Sites most suitable for protection under these criteria will receive the highest total scores, and sites least suitable, the lowest scores.

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, adjust the site assessment points to a base of 160. Example: if the Site Assessment maximum is 200 points, and alternative Site "A" is rated 180 points:

$\text{Total points assigned Site A} = 180 \times 160 = 144$ points for Site "A."
Maximum points possible 200

Site Assessment Scoring for the Twelve Factors Used in FPPA

The Site Assessment criteria used in the Farmland Protection Policy Act (FPPA) rule are designed to assess important factors other than the agricultural value of the land when determining which alternative sites should receive the highest level of protection from conversion to non agricultural uses.

Twelve factors are used for Site Assessment and ten factors for corridor-type sites. Each factor is listed in an outline form, without detailed definitions or guidelines to follow in the rating process. The purpose of this document is to expand the definitions of use of each of the twelve Site Assessment factors so that all persons can have a clear understanding as to what each factor is intended to evaluate and how points are assigned for given conditions.

In each of the 12 factors a number rating system is used to determine which sites deserve the most protection from conversion to non-farm uses. The higher the number value given to a proposed site, the more protection it will receive. The maximum scores are 10, 15 and 20 points, depending upon the relative importance of each particular question. If a question significantly relates to why a parcel of land should not be converted, the question has a maximum possible protection value of 20, whereas a question which does not have such a significant impact upon whether a site would be converted, would have fewer maximum points possible, for example 10.

The following guidelines should be used in rating the twelve Site Assessment criteria:

1. How much land is in non-urban use within a radius of 1.0 mile from where the project is intended?

More than 90 percent	15 points
90-20 percent	14 to 1 points
Less than 20 percent	0 points

This factor is designed to evaluate the extent to which the area within one mile of the proposed site is non-urban area. For purposes of this rule, "non-urban" should include:

- Agricultural land (crop-fruit trees, nuts, oilseed)
- Range land
- Forest land
- Golf Courses
- Non paved parks and recreational areas
- Mining sites
- Farm Storage
- Lakes, ponds and other water bodies
- Rural roads, and through roads without houses or buildings
- Open space
- Wetlands
- Fish production
- Pasture or hayland

Urban uses include:

- Houses (other than farm houses)
- Apartment buildings
- Commercial buildings
- Industrial buildings
- Paved recreational areas (i.e. tennis courts)
- Streets in areas with 30 structures per 40 acres
- Gas stations

- Equipment, supply stores
- Off-farm storage
- Processing plants
- Shopping malls
- Utilities/Services
- Medical buildings

In rating this factor, an area one-mile from the outer edge of the proposed site should be outlined on a current photo; the areas that are urban should be outlined. For rural houses and other buildings with unknown sizes, use 1 and 1/3 acres per structure. For roads with houses on only one side, use one half of road for urban and one half for non-urban.

The purpose of this rating process is to insure that the most valuable and viable farmlands are protected from development projects sponsored by the Federal Government. With this goal in mind, factor S1 suggests that the more agricultural lands surrounding the parcel boundary in question, the more protection from development this site should receive. Accordingly, a site with a large quantity of non-urban land surrounding it will receive a greater number of points for protection from development. Thus, where more than 90 percent of the area around the proposed site (do not include the proposed site in this assessment) is non-urban, assign 15 points. Where 20 percent or less is non-urban, assign 0 points. Where the area lies between 20 and 90 percent non-urban, assign appropriate points from 14 to 1, as noted below.

Percent Non-Urban Land within 1 mile	Points
90 percent or greater	15
85 to 89 percent	14
80 to 84 percent	13
75 to 79 percent	12
70 to 74 percent	11
65 to 69 percent	10
60 to 64 percent	9
55 to 59 percent	8
50 to 54 percent	7
45 to 49 percent	6
40 to 44 percent	5
35 to 39 percent	4
30 to 24 percent	3
25 to 29 percent	2
21 to 24 percent	1
20 percent or less	0

2. How much of the perimeter of the site borders on land in non-urban use?

More than 90 percent:	10 points
90 to 20 percent:	9 to 1 point(s)
Less than 20 percent:	0 points

This factor is designed to evaluate the extent to which the land adjacent to the proposed site is non-urban use. Where factor #1 evaluates the general location of the proposed site, this factor evaluates the immediate perimeter of the site. The definition of urban and non-urban uses in factor #1 should be used for this factor.

In rating the second factor, measure the perimeter of the site that is in non-urban and urban use. Where more than 90 percent of the perimeter is in non-urban use, score this factor 10 points. Where less than 20 percent, assign 0 points. If a road is next to the perimeter, class the area according to the

use on the other side of the road for that area. Use 1 and 1/3 acre per structure if not otherwise known. Where 20 to 90 percent of the perimeter is non-urban, assign points as noted below:

Percentage of Perimeter Bordering Land	Points
90 percent or greater	10
82 to 89 percent	9
74 to 81 percent	8
65 to 73 percent	7
58 to 65 percent	6
50 to 57 percent	5
42 to 49 percent	4
34 to 41 percent	3
27 to 33 percent	2
21 to 26 percent	1
20 percent or Less	0

3. How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last ten years?

More than 90 percent:	20 points
90 to 20 percent:	19 to 1 point(s)
Less than 20 percent:	0 points

This factor is designed to evaluate the extent to which the proposed conversion site has been used or managed for agricultural purposes in the past 10 years.

Land is being farmed when it is used or managed for food or fiber, to include timber products, fruit, nuts, grapes, grain, forage, oil seed, fish and meat, poultry and dairy products.

Land that has been left to grow up to native vegetation without management or harvest will be considered as abandoned and therefore not farmed. The proposed conversion site should be evaluated and rated according to the percent, of the site farmed.

If more than 90 percent of the site has been farmed 5 of the last 10 years score the site as follows:

Percentage of Site Farmed	Points
90 percent or greater	20
86 to 89 percent	19
82 to 85 percent	18
78 to 81 percent	17
74 to 77 percent	16
70 to 73 percent	15
66 to 69 percent	14
62 to 65 percent	13
58 to 61 percent	12
54 to 57 percent	11
50 to 53 percent	10
46 to 49 percent	9
42 to 45 percent	8
38 to 41 percent	7
35 to 37 percent	6
32 to 34 percent	5
29 to 31 percent	4
26 to 28 percent	3

23 to 25 percent	2
20 to 22 percent percent or Less	1
Less than 20 percent	0

4. Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

Site is protected:	20 points
Site is not protected:	0 points

This factor is designed to evaluate the extent to which state and local government and private programs have made efforts to protect this site from conversion.

State and local policies and programs to protect farmland include:

State Policies and Programs to Protect Farmland

1. Tax Relief:

A. Differential Assessment: Agricultural lands are taxed on their agricultural use value, rather than at market value. As a result, farmers pay fewer taxes on their land, which helps keep them in business, and therefore helps to insure that the farmland will not be converted to nonagricultural uses.

1. **Preferential Assessment for Property Tax:** Landowners with parcels of land used for agriculture are given the privilege of differential assessment.
2. **Deferred Taxation for Property Tax:** Landowners are deterred from converting their land to nonfarm uses, because if they do so, they must pay back taxes at market value.
3. **Restrictive Agreement for Property Tax:** Landowners who want to receive Differential Assessment must agree to keep their land in - eligible use.

B. Income Tax Credits

Circuit Breaker Tax Credits: Authorize an eligible owner of farmland to apply some or all of the property taxes on his or her farmland and farm structures as a tax credit against the owner's state income tax.

C. Estate and Inheritance Tax Benefits

Farm Use Valuation for Death Tax: Exemption of state tax liability to eligible farm estates.

2. "Right to farm" laws:

Prohibits local governments from enacting laws which will place restrictions upon normally accepted farming practices, for example, the generation of noise, odor or dust.

3. Agricultural Districting:

Wherein farmers voluntarily organize districts of agricultural land to be legally recognized geographic areas. These farmers receive benefits, such as protection from annexation, in exchange for keeping land within the district for a given number of years.

4. Land Use Controls: Agricultural Zoning.

Types of Agricultural Zoning Ordinances include:

- Exclusive:** In which the agricultural zone is restricted to only farm-related dwellings, with, for example, a minimum of 40 acres per dwelling unit.
- Non-Exclusive:** In which non-farm dwellings are allowed, but the density remains low, such as 20 acres per dwelling unit.

Additional Zoning techniques include:

- Sliding Scale:** This method looks at zoning according to the total size of the parcel owned. For example, the number of dwelling units per a given number of acres may change from county to county according to the existing land acreage to dwelling unit ratio of surrounding parcels of land within the specific area.
- Point System or Numerical Approach:** Approaches land use permits on a case by case basis.

LESA: The LESA system (Land Evaluation-Site Assessment) is used as a tool to help assess options for land use on an evaluation of productivity weighed against commitment to urban development.
- Conditional Use:** Based upon the evaluation on a case by case basis by the Board of Zoning Adjustment. Also may include the method of using special land use permits.

5. Development Rights:

- Purchase of Development Rights (PDR):** Where development rights are purchased by Government action.

Buffer Zoning Districts: Buffer Zoning Districts are an example of land purchased by Government action. This land is included in zoning ordinances in order to preserve and protect agricultural lands from non-farm land uses encroaching upon them.

- Transfer of Development Rights (TDR):** Development rights are transferable for use in other locations designated as receiving areas. TDR is considered a locally based action (not state), because it requires a voluntary decision on the part of the individual landowners.

6. Governor's Executive Order: Policy made by the Governor, stating the importance of agriculture, and the preservation of agricultural lands. The Governor orders the state agencies to avoid the unnecessary conversion of important farmland to nonagricultural uses.

7. Voluntary State Programs:

- California's Program of Restrictive Agreements and Differential Assessments:** The California Land Conservation Act of 1965, commonly known as the Williamson Act, allows cities, counties and individual landowners to form agricultural preserves and enter into contracts for 10 or more years to insure that these parcels of land remain strictly for agricultural use. Since 1972 the Act has extended eligibility to recreational and open space lands such as scenic highway corridors, salt ponds and wildlife preserves. These contractually restricted lands may be taxed differentially for their real value. One hundred-acre districts constitute the minimum land size eligible.

Suggestion: An improved version of the Act would state that if the land is converted after the contract expires, the landowner must pay the difference in the taxes between market value for the land and the agricultural tax value which he or she had been

paying under the Act. This measure would help to insure that farmland would not be converted after the 10 year period ends.

- B. Maryland Agricultural Land Preservation Program: Agricultural landowners within agricultural districts have the opportunity to sell their development rights to the Maryland Land Preservation Foundation under the agreement that these landowners will not subdivide or develop their land for an initial period of five years. After five years the landowner may terminate the agreement with one year notice.

As is stated above under the California Williamson Act, the landowner should pay the back taxes on the property if he or she decides to convert the land after the contract expires, in order to discourage such conversions.

- C. Wisconsin Income Tax Incentive Program: The Wisconsin Farmland Preservation Program of December 1977 encourages local jurisdictions in Wisconsin to adopt agricultural preservation plans or exclusive agricultural district zoning ordinances in exchange for credit against state income tax and exemption from special utility assessment. Eligible candidates include local governments and landowners with at least 35 acres of land per dwelling unit in agricultural use and gross farm profits of at least \$6,000 per year, or \$18,000 over three years.

8. Mandatory State Programs:

- A. The Environmental Control Act in the state of Vermont was adopted in 1970 by the Vermont State Legislature. The Act established an environmental board with 9 members (appointed by the Governor) to implement a planning process and a permit system to screen most subdivisions and development proposals according to specific criteria stated in the law. The planning process consists of an interim and a final Land Capability and Development Plan, the latter of which acts as a policy plan to control development. The policies are written in order to:

- prevent air and water pollution;
- protect scenic or natural beauty, historic sites and rare and irreplaceable natural areas; and
- consider the impacts of growth and reduction of development on areas of primary agricultural soils.

- B. The California State Coastal Commission: In 1976 the Coastal Act was passed to establish a permanent Coastal Commission with permit and planning authority. The purpose of the Coastal Commission was and is to protect the sensitive coastal zone environment and its resources, while accommodating the social and economic needs of the state. The Commission has the power to regulate development in the coastal zones by issuing permits on a case by case basis until local agencies can develop their own coastal plans, which must be certified by the Coastal Commission.

- C. Hawaii's Program of State Zoning: In 1961, the Hawaii State Legislature established Act 187, the Land Use Law, to protect the farmland and the welfare of the local people of Hawaii by planning to avoid "unnecessary urbanization". The Law made all state lands into four districts: agricultural, conservation, rural and urban. The Governor appointed members to a State Land Use Commission, whose duties were to uphold the Law and form the boundaries of the four districts. In addition to state zoning, the Land Use Law introduced a program of Differential Assessment, wherein agricultural landowners paid taxes on their land for its agricultural use value, rather than its market value.

- D. The Oregon Land Use Act of 1973: This act established the Land Conservation and Development Commission (LCDC) to provide statewide planning goals and guidelines.

Under this Act, Oregon cities and counties are each required to draw up a comprehensive plan, consistent with statewide planning goals. Agricultural land preservation is high on the list of state goals to be followed locally.

If the proposed site is subject to or has used one or more of the above farmland protection programs or policies, score the site 20 points. If none of the above policies or programs apply to this site, score 0 points.

5. How close is the site to an urban built-up area?

The site is 2 miles or more from an urban built-up area	15 points
The site is more than 1 mile but less than 2 miles from an urban built-up area	10 points
The site is less than 1 mile from, but is not adjacent to an urban built-up area	5 points
The site is adjacent to an urban built-up area	0 points

This factor is designed to evaluate the extent to which the proposed site is located next to an existing urban area. The urban built-up area must be 2500 population. The measurement from the built-up area should be made from the point at which the density is 30 structures per 40 acres and with no open or non-urban land existing between the major built-up areas and this point. Suburbs adjacent to cities or urban built-up areas should be considered as part of that urban area.

For greater accuracy, use the following chart to determine how much protection the site should receive according to its distance from an urban area. See chart below:

Distance From Perimeter of Site to Urban Area	Points
More than 10,560 feet	15
9,860 to 10,559 feet	14
9,160 to 9,859 feet	13
8,460 to 9,159 feet	12
7,760 to 8,459 feet	11
7,060 to 7,759 feet	10
6,360 to 7,059 feet	9
5,660 to 6,359 feet	8
4,960 to 5,659 feet	7
4,260 to 4,959 feet	6
3,560 to 4,259 feet	5
2,860 to 3,559 feet	4
2,160 to 2,859 feet	3
1,460 to 2,159 feet	2
760 to 1,459 feet	1
Less than 760 feet (adjacent)	0

6. How close is the site to water lines, sewer lines and/or other local facilities and services whose capacities and design would promote nonagricultural use?

None of the services exist nearer than 3 miles from the site	15 points
Some of the services exist more than one but less than 3 miles from the site	10 points
All of the services exist within 1/2 mile of the site	0 points

This question determines how much infrastructure (water, sewer, etc.) is in place which could facilitate nonagricultural development. The fewer facilities in place, the more difficult it is to develop an area. Thus, if a proposed site is further away from these services (more than 3 miles distance away), the site should be awarded the highest number of points (15). As the distance of the parcel of land to services decreases, the number of points awarded declines as well. So, when the site is equal to or further than 1 mile but less than 3 miles away from services, it should be given 10 points. Accordingly, if this distance is 1/2 mile to less than 1 mile, award 5 points; and if the distance from land to services is less than 1/2 mile, award 0 points.

Distance to public facilities should be measured from the perimeter of the parcel in question to the nearest site(s) where necessary facilities are located. If there is more than one distance (i.e. from site to water and from site to sewer), use the average distance (add all distances and then divide by the number of different distances to get the average).

Facilities which could promote nonagricultural use include:

- Water lines
- Sewer lines
- Power lines
- Gas lines
- Circulation (roads)
- Fire and police protection
- Schools

7. Is the farm unit(s) containing the site (before the project) as large as the average-size farming unit in the county? (Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage of Farm Units in Operation with \$1,000 or more in sales.)

As large or larger:	10 points
Below average: Deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more is below average	9 to 0 points

This factor is designed to determine how much protection the site should receive, according to its size in relation to the average size of farming units within the county. The larger the parcel of land, the more agricultural use value the land possesses, and vice versa. Thus, if the farm unit is as large or larger than the county average, it receives the maximum number of points (10). The smaller the parcel of land compared to the county average, the fewer number of points given. Please see below:

Parcel Size in Relation to Average County Size	Points
Same size or larger than average (100 percent)	10
95 percent of average	9
90 percent of average	8
85 percent of average	7
80 percent of average	6
75 percent of average	5
70 percent of average	4
65 percent of average	3
60 percent of average	2
55 percent of average	1
50 percent or below county average	0

State and local Natural Resources Conservation Service offices will have the average farm size information, provided by the latest available Census of Agriculture data

8. If this site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

Acreage equal to more than 25 percent of acres directly converted by the project	10 points
Acreage equal to between 25 and 5 percent of the acres directly converted by the project	9 to 1 point(s)
Acreage equal to less than 5 percent of the acres directly converted by the project	0 points

This factor tackles the question of how the proposed development will affect the rest of the land on the farm. The site which deserves the most protection from conversion will receive the greatest number of points, and vice versa. For example, if the project is small, such as an extension on a house, the rest of the agricultural land would remain farmable, and thus a lower number of points is given to the site. Whereas if a large-scale highway is planned, a greater portion of the land (not including the site) will become non-farmable, since access to the farmland will be blocked; and thus, the site should receive the highest number of points (10) as protection from conversion.

Conversion uses of the Site Which Would Make the Rest of the Land Non-Farmable by Interfering with Land Patterns

Conversions which make the rest of the property nonfarmable include any development which blocks accessibility to the rest of the site. Examples are highways, railroads, dams or development along the front of a site restricting access to the rest of the property.

The point scoring is as follows:

Amount of Land Not Including the Site Which Will Become Non-Farmable	Points
25 percent or greater	10
23 - 24 percent	9
21 - 22 percent	8
19 - 20 percent	7
17 - 18 percent	6
15 - 16 percent	5
13 - 14 percent	4
11 - 12 percent	3
9 - 11 percent	2
6 - 8 percent	1
5 percent or less	0

9. Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

All required services are available	5 points
Some required services are available	4 to 1 point(s)
No required services are available	0 points

This factor is used to assess whether there are adequate support facilities, activities and industry to keep the farming business in business. The more support facilities available to the agricultural

landowner, the more feasible it is for him or her to stay in production. In addition, agricultural support facilities are compatible with farmland. This fact is important, because some land uses are not compatible; for example, development next to farmland can be dangerous to the welfare of the agricultural land, as a result of pressure from the neighbors who often do not appreciate the noise, smells and dust intrinsic to farmland. Thus, when all required agricultural support services are available, the maximum number of points (5) are awarded. When some services are available, 4 to 1 point(s) are awarded; and consequently, when no services are available, no points are given. See below:

Percent of Services Available	Points
100 percent	5
75 to 99 percent	4
50 to 74 percent	3
25 to 49 percent	2
1 to 24 percent	1
No services	0

10. Does the site have substantial and well-maintained on farm investments such as barns, other storage buildings, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

High amount of on-farm investment	20 points
Moderate amount of non-farm investment	19 to 1 point(s)
No on-farm investments	0 points

This factor assesses the quantity of agricultural facilities in place on the proposed site. If a significant agricultural infrastructure exists, the site should continue to be used for farming, and thus the parcel will receive the highest amount of points towards protection from conversion or development. If there is little on farm investment, the site will receive comparatively less protection. See below:

Amount of On-farm Investment	Points
As much or more than necessary to maintain production (100 percent)	20
95 to 99 percent	19
90 to 94 percent	18
85 to 89 percent	17
80 to 84 percent	16
75 to 79 percent	15
70 to 74 percent	14
65 to 69 percent	13
60 to 64 percent	12
55 to 59 percent	11
50 to 54 percent	10
45 to 49 percent	9
40 to 44 percent	8
35 to 39 percent	7
30 to 34 percent	6
25 to 29 percent	5
20 to 24 percent	4
15 to 19 percent	3
10 to 14 percent	2
5 to 9 percent	1
0 to 4 percent	0

11. Would the project at this site, by converting farmland to nonagricultural use, reduce the support for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

Substantial reduction in demand for support services if the site is converted	10 points
Some reduction in demand for support services if the site is converted	9 to 1 point(s)
No significant reduction in demand for support services if the site is converted	0 points

This factor determines whether there are other agriculturally related activities, businesses or jobs dependent upon the working of the pre-converted site in order for the others to remain in production. The more people and farming activities relying upon this land, the more protection it should receive from conversion. Thus, if a substantial reduction in demand for support services were to occur as a result of conversions, the proposed site would receive a high score of 10; some reduction in demand would receive 9 to 1 point(s), and no significant reduction in demand would receive no points.

Specific points are outlined as follows:

Amount of Reduction in Support Services if Site is Converted to Nonagricultural Use	Points
Substantial reduction (100 percent)	10
90 to 99 percent	9
80 to 89 percent	8
70 to 79 percent	7
60 to 69 percent	6
50 to 59 percent	5
40 to 49 percent	4
30 to 39 percent	3
20 to 29 percent	2
10 to 19 percent	1
No significant reduction (0 to 9 percent)	0

12. Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of the surrounding farmland to nonagricultural use?

Proposed project is incompatible with existing agricultural use of surrounding farmland	10 points
Proposed project is tolerable of existing agricultural use of surrounding farmland	9 to 1 point(s)
Proposed project is fully compatible with existing agricultural use of surrounding farmland	0 points

Factor 12 determines whether conversion of the proposed agricultural site will eventually cause the conversion of neighboring farmland as a result of incompatibility of use of the first with the latter. The more incompatible the proposed conversion is with agriculture, the more protection this site receives from conversion. Therefore, if the proposed conversion is incompatible with agriculture, the site receives 10 points. If the project is tolerable with agriculture, it receives 9 to 1 points; and if the proposed conversion is compatible with agriculture, it receives 0 points.

CORRIDOR - TYPE SITE ASSESSMENT CRITERIA

The following criteria are to be used for projects that have a linear or corridor - type site configuration connecting two distant points, and crossing several different tracts of land. These include utility lines, highways, railroads, stream improvements, and flood control systems. Federal agencies are to assess the suitability of each corridor-type site or design alternative for protection as farmland along with the land evaluation information.

For Water and Waste Programs, corridor analyses are not applicable for distribution or collection networks. Analyses are applicable for transmission or trunk lines where placement of the lines are flexible.

(1) How much land is in nonurban use within a radius of 1.0 mile from where the project is intended?

- | | |
|--------------------------|-----------------------|
| (2) More than 90 percent | (3) 15 points |
| (4) 90 to 20 percent | (5) 14 to 1 point(s). |
| (6) Less than 20 percent | (7) 0 points |

(2) How much of the perimeter of the site borders on land in nonurban use?

- | | |
|--------------------------|-------------------|
| (3) More than 90 percent | (4) 10 point(s) |
| (5) 90 to 20 percent | (6) 9 to 1 points |
| (7) less than 20 percent | (8) 0 points |

(3) How much of the site has been farmed (managed for a scheduled harvest or timber activity) more than five of the last 10 years?

- | | |
|--------------------------|----------------------|
| (4) More than 90 percent | (5) 20 points |
| (6) 90 to 20 percent | (7) 19 to 1 point(s) |
| (8) Less than 20 percent | (9) 0 points |

(4) Is the site subject to state or unit of local government policies or programs to protect farmland or covered by private programs to protect farmland?

- | | |
|-----------------------|-----------|
| Site is protected | 20 points |
| Site is not protected | 0 points |

(5) Is the farm unit(s) containing the site (before the project) as large as the average - size farming unit in the County? (Average farm sizes in each county are available from the NRCS field offices in each state. Data are from the latest available Census of Agriculture, Acreage of Farm Units in Operation with \$1,000 or more in sales.)

- | | |
|---|---------------|
| As large or larger | 10 points |
| Below average deduct 1 point for each 5 percent below the average, down to 0 points if 50 percent or more below average | 9 to 0 points |

(6) If the site is chosen for the project, how much of the remaining land on the farm will become non-farmable because of interference with land patterns?

- | | |
|--|------------------|
| Acreage equal to more than 25 percent of acres directly converted by the project | 25 points |
| Acreage equal to between 25 and 5 percent of the acres directly converted by the project | 1 to 24 point(s) |
| Acreage equal to less than 5 percent of the acres directly converted by the project | 0 points |

(7) Does the site have available adequate supply of farm support services and markets, i.e., farm suppliers, equipment dealers, processing and storage facilities and farmer's markets?

- | | |
|--------------------------------------|-----------------|
| All required services are available | 5 points |
| Some required services are available | 4 to 1 point(s) |
| No required services are available | 0 points |

(8) Does the site have substantial and well-maintained on-farm investments such as barns, other storage building, fruit trees and vines, field terraces, drainage, irrigation, waterways, or other soil and water conservation measures?

- | | |
|---------------------------------------|------------------|
| High amount of on-farm investment | 20 points |
| Moderate amount of on-farm investment | 19 to 1 point(s) |
| No on-farm investment | 0 points |

(9) Would the project at this site, by converting farmland to nonagricultural use, reduce the demand for farm support services so as to jeopardize the continued existence of these support services and thus, the viability of the farms remaining in the area?

- | | |
|--|------------------|
| Substantial reduction in demand for support services if the site is converted | 25 points |
| Some reduction in demand for support services if the site is converted | 1 to 24 point(s) |
| No significant reduction in demand for support services if the site is converted | 0 points |

(10) Is the kind and intensity of the proposed use of the site sufficiently incompatible with agriculture that it is likely to contribute to the eventual conversion of surrounding farmland to nonagricultural use?

- | | |
|---|-----------------|
| Proposed project is incompatible to existing agricultural use of surrounding farmland | 10 points |
| Proposed project is tolerable to existing agricultural use of surrounding farmland | 9 to 1 point(s) |
| Proposed project is fully compatible with existing agricultural use of surrounding farmland | 0 points |



8110-03
October 19, 2012

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Angel Figueroa, Director, NRCS, Pacific Islands Area
United States Department of Agriculture
Natural Resources Conservation Service
P.O. Box 50004, Room 4-118
Honolulu, Hawai'i 96850

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Figueroa:

Thank you for your letter dated September 11, 2012 regarding the subject project. As the privately-owned and funded Island School campus improvements will not involve any assistance from Federal agencies, the proposed project will not be subject to the Farmland Protection Policy Act.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

AUG 31 2012

DEAN H. SEKI
COMPTROLLER

(P)1197.2



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Dean H. Seki, Comptroller
State of Hawai'i
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawai'i 96810-0119

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Pre-Assessment Consultation Draft Environmental Assessment
Island School, Puhi, Kauai
TMK: (4) 3-8-002: 016

Thank you for the opportunity to provide comments for the subject project. The proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and we have no comments to offer at this time.

If you have any questions, please call me at 586-0400 or have your staff call Ms. Gayle Takasaki of the Public Works Division at 586-0584.

Sincerely,

DEAN H. SEKI
Comptroller

Dear Mr. Seki:

Thank you for your letter dated August 31, 2012 (Ref. (P)1197.2), indicating that the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and that you have no comments to offer at this time.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
Governor

BRIAN SCHATZ
Lieutenant Governor

RICHARD LIM
Director

MARY ALICE EVANS
Deputy Director



LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawai'i

DANIEL ORODENKER
Executive Officer

BERT K. SARUWATARI
Planner

SCOTT A.K. DERRICKSON, AICP
Planner

FRED A. TALON
Drafting Technician

RILEY K. HAKODA
Chief Clerk

We have no further comments to offer at this time. Thank you for the opportunity to comment. Should you have any questions, please feel free to call me or Scott Derrickson, AICP of our office at 587-3822.

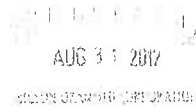
Sincerely,

DANIEL ORODENKER
Executive Officer

cc: State Office of Planning
County of Kaua'i, Planning Department

August 29, 2012

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawai'i 96826



Dear Mr. Matsukawa:

On August 21, 2012, the Commission received your Pre-Assessment Consultation request for the Draft Environmental Assessment (EA) for Island School. We have reviewed the Project Summary and have the following comments:

1. The identified trigger for compliance with Chapter 343, Hawai'i Revised Statutes (HRS), is the need for a County General Plan (GP) Amendment. We assume that the applicant will be seeking the GP amendment prior to petitioning for a State Land Use Boundary Amendment. Please clarify the sequence the applicant will pursue in seeking regulatory approvals and identify the accepting authority for the EA.
2. Within the discussion of the Project Background, please provide additional detail regarding past Special Permit approvals on the various parcels that now comprise the Project site. In addition, some discussion of any conditions that were included in any of the Special Permit approvals might assist government agencies and the public in reviewing the draft EA.
3. The Introduction acknowledges the intent of the Kaua'i Community College (KCC) to also seek a State Land Use District Boundary amendment. Please provide additional information about the timing of both Island School's intended timing for their petition and that of KCC's intended petition.
4. The EA should address the potential cumulative impacts on infrastructure systems based on Island School's proposed Master Plan, the adjacent KCC's proposed Master Plan, and the proposed by-pass road delineated in the County General Plan Land Use Map (figure 4).
5. Technical studies should also include discussion of storm water drainage, water, and wastewater systems.



8110-03
October 19, 2012

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Daniel Orodener, Executive Officer
State of Hawai'i
Department of Business, Economic Development & Tourism
Land Use Commission
P.O. Box 2359
Honolulu, Hawai'i 96804

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhī, Līhu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Orodener:

Thank you for your letter dated August 29, 2012 regarding the subject project. We offer the following responses in the order of your comments:

1. Island School, the Petitioner, will pursue the County General Plan Amendment process prior to petitioning for a State Land Use District Boundary Amendment. The County of Kaua'i Planning Department will be the Approving Agency for the EA. This information will be included in the Draft EA.
2. A discussion of the prior Special Permits and land use permit approvals for the project site will be included in the Draft EA. The conditions of the Special Permits and land use permits approved for the existing facilities have been fulfilled in conjunction with the development of the respective facilities.
3. The respective Petitions for State Land Use District Boundary Amendment for Island School and the Kaua'i Community College campus are planned to be filed concurrently with the State Land Use Commission by April 2013. This information will be included in the Draft EA.
4. Kaua'i Community College's (KCC) updated Long Range Development Plan (LRDP) is a conceptual reallocation of land uses previously recommended by the Ultimate Site Plan presented in the 1999 LRDP. The University of Hawai'i Community Colleges has no plans to implement major facilities or buildings at the KCC campus within the timeframe of Island School's updated master plan. Therefore, the discussion of the potential cumulative impacts is limited to traffic impacts, which is based on Island School's and KCC's student enrollment projections. No other potential cumulative impacts can be determined at this time.



8110-03
Letter to Mr. Orodener
October 19, 2012
Page 2

The planned Līhu'e-Hanamā'ulu Mauka Bypass Road is depicted as a general corridor on the County General Plan's Līhu'e Planning District Land Use Map. As indicated in the General Plan, this road is one of several roadway improvements representing needed roadway capacity, not actual projects, by 2020. A sub-area circulation study is currently proposed to be conducted by the County Department of Public Works to validate the need and priority of the Līhu'e-Hanamā'ulu Mauka Bypass Road. Due to the uncertainty of the development timeline of this road relative to the proposed project, the potential cumulative impacts associated with it cannot be determined at this time.

5. The Draft EA will include discussion of the existing and proposed drainage, water and wastewater systems for the proposed project.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

OFFICE OF PLANNING
235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

NEIL ABERCROMBIE
GOVERNOR
RICHARD C. LIM
DIRECTOR
MARY ALICE EVANS
DEPUTY DIRECTOR
JESSE K. SOUKI
DIRECTOR
OFFICE OF PLANNING
Telephone: (808) 587-2848
Fax: (808) 587-2824

Ref. No. P-13721

September 21, 2012

Mr. Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Pre-Assessment Consultation
Draft Environmental Assessment
Island School
Tax Map Key: (4) 3-8-002:016
Puhī, Lihū'e District, Island of Kaua'i

The Office of Planning (OP) has reviewed the project summary submitted for the proposed Island School Campus Master Plan Update. The proposed project is to accommodate additional campus facilities for future expansion on the Island School campus which totals 38.448 acres. Of the total acreage, 10 acres are used for school facilities under County issued special permits, use permits, and zoning permits. The petitioner intends to reclassify the entire property from the State Agricultural District to the State Urban District. In our review of requests for boundary amendments and their supporting environmental compliance documents, the following are important considerations:

1. OP represents the State as a mandatory party in proceedings before the State Land Use Commission (LUC). In developing its position on a petition, OP evaluates whether the project meets the LUC decision-making criteria in HRS §205-17, as well as **its conformance** with Coastal Zone Management objectives and policies in HRS §205 A-2. OP also encourages petitioners to review their proposals with respect to the Administration's priorities in implementing the goals of the Hawai'i State Plan, HRS Chapter 226. These priorities are set out in the Administration's New Day Comprehensive Plan, which is available at <http://hawaii.gov/about/a-new-day>.
2. Attached for your review and consideration in your environmental assessment and petition is a document entitled, "Attachment A - Issues of Concern in District Boundary Amendment Proceedings Based on LUC Decision-Making Criteria." We encourage early consultation with our office to discuss how a petition will address these issues and criteria – particularly the areas of State concern in this document and

Mr. Earl Matsukawa
Page 2
September 21, 2012

best practices that could or will be incorporated in the proposed project to address State priority guidelines for sustainability. A short list of resources related to best practices can be found at the OP website at http://hawaii.gov/dbedt/op/land_use.htm.

3. It would be useful in the Draft Environmental Assessment to reference the County of Kaua'i's Important Agricultural Lands Study currently underway, and to discuss how lands within and adjacent to the proposed petition area are scored by that study.

If you have any questions, please contact Scott Forsythe of our Land Use Division at 587-2805.

Sincerely,

Jesse K. Souki
Director

Attachment

Attachment A
Issues of Concern in District Boundary Amendment Proceedings
Based on LUC Decision-Making Criteria

The following issues are commonly discussed and analyzed for project proposals in petitions and their supporting environmental assessments (EAs) or environmental impact statements (EISs) prepared pursuant to Chapter 343, Hawai'i Revised Statutes (HRS). This list reflects the range of issues the State Land Use Commission (LUC) must take into consideration in its decision-making under Chapter 205, HRS, and Chapter 15-15, Hawai'i Administrative Rules (HAR). This list is not exhaustive or complete.

1. **Water Resources.** Groundwater and surface water resource protection and water quality are critical State issues. A thorough evaluation of these resources includes identifying and discussing: (a) estimated water demand by types of land use; (b) proposed potable and non-potable water sources to be used for the project and measures to reduce water demand and promote water reuse in the project; (c) whether the proposed project is within a designated Water Management Area; (d) the impact of the project on the sustainable yield and water quality of affected aquifers and surface water sources; (e) permits or other approvals required for proposed water source use; and (f) the consistency of the project and impact of the project in terms of proposed water use and system improvements and priorities contained in the County water use and development plan, prepared pursuant to the State Water Code, Chapter 174C, HRS.
2. **Agricultural Lands.** Article XI, Section 3, of the Hawai'i State Constitution provides that "[t]he State shall conserve and protect agricultural lands, promote diversified agriculture, increase agricultural self-sufficiency, and assure the availability of agriculturally suitable lands." Protecting agriculture is a policy objective in the Hawai'i State Plan, Chapter 226, HRS, and in the State Administration's New Day Comprehensive Plan, which is available at <http://hawaii.gov/gov/about/a-new-day>. Agricultural activity in the vicinity of the proposed project should be identified, and the impact of urban use or conversion of project lands on existing and future agricultural use and the viability of agricultural use of adjoining agricultural lands needs to be examined. Please discuss how the proposed project meets policy objectives to promote and protect agriculture, particularly in cases where the lands have high agricultural value.
3. **Affordable Housing.** Increasing the supply of affordable housing is a critical State and County issue. Every County has an affordable housing policy and both the Hawai'i State Plan, Chapter 226, HRS, and the State Administration's New Day Comprehensive Plan identify affordable housing as a policy priority. If applicable, please discuss specifically how the proposed project will meet State and County affordable housing policy objectives, to include a discussion of how the project's proposed residential product types will be allocated among the market and various affordable housing target populations, and the expected price ranges for the different product types.
4. **Coastal Zone Management (CZM).** The Office of Planning is the lead agency for the Hawai'i CZM Program, which is a Federal-State partnership for protecting, restoring, and responsibly developing coastal communities and resources. The coastal zone is defined as all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the United States territorial sea (HRS § 205A-1). EA/EISs should reference this definition of the coastal zone. State agency actions must be consistent with the CZM program objectives and policies under Section 205A-2, HRS. The EA/EIS needs to discuss the project in terms of its consistency with the following CZM objective areas.
 - a. **Coastal and Ocean Resources.** The State has an interest in protecting coastal and marine ecosystems and resources, as well as coastal and marine water quality. The EA/EIS should identify any coastal and marine resources and ecosystems that may be impacted by the proposed project, and the potential for nonpoint sources of pollution from the project to adversely affect coastal and marine water quality. Project impacts on existing site and offsite

hydrology and measures to manage stormwater and runoff need to be discussed. The Office of Planning recommends the use of low impact development (LID) techniques and other best management practices (BMPs) that promote onsite infiltration and minimize runoff from storm events. More information on LID and stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.

- b. **Coastal and Other Hazards.** The EA/EIS should describe any hazard risks that are relevant to the site and describe the measures that are proposed to mitigate any hazard impacts, such as from tsunami, hurricane, wind, storm wave, sea level rise, flood, erosion, volcanic activity, earthquake, landslide, subsidence, and point and nonpoint source pollution. This should include a discussion of any wildfire hazard and any mitigation measures that might be required to address potential threats from wildfires.

The EA/EIS process also provides an opportunity to address the sustainability of proposed projects in terms of natural hazards and hazard mitigation, and the potential impact of climate change on the proposed project over time. To this end, OP recommends the final EA/EIS include a discussion of the proposed project with respect to the *State Multi-Hazard Mitigation Plan, 2010 Update*, adopted in September 2010, available at <http://www.scd.hawaii.gov/documents/HawaiiMultiHazardMitigationPlan2010PUBLIC.pdf>, as well as the respective County Hazard Mitigation Plan.

- c. **Coastal-dependent Uses and Beach Protection.** If the project is located on or near the coast, the EA/EIS should discuss why the proposed development needs to be located on the coast, the economic uses that will be of benefit to the State, as well as potential impacts on beach access. The discussion should identify measures to protect beach systems and ensure short- and long-term public access to beaches.
- d. **Coastal Recreational Resources.** If the project is located on the coast, the EA/EIS should include a description of recreational uses and facilities on or near the project site, and discuss how the impact of increasing users on coastal and ocean recreational resources and competing uses will be mitigated and managed during project development and buildout.
- e. **Scenic Resources.** The EA/EIS should discuss the impact of the proposed project on scenic views to and from the coast and along the coast and coastal open space, and how any impacts on these scenic and open space resources will be avoided, minimized, or mitigated.
- f. **Special Management Area (SMA) Permitting.** The SMA is defined by the Counties and includes areas in the coastal zone that are particularly sensitive so that it requires special attention. Please identify whether the proposed project is within the SMA and how SMA permitting requirements pursuant to Chapter 205A, HRS, will be satisfied.

For additional resources and information, visit <http://hawaii.gov/dbedt/czm>.

5. **Cultural, Archaeological, and Historic Resources.** Another CZM objective is to protect, preserve, and where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone that are significant in Hawaiian and American history and culture. If archaeological or historic properties or artifacts, including native Hawaiian burials, are identified in an archaeological inventory survey on the property, the EA/EIS should discuss how the petitioner has consulted with the State Historic Preservation Division (SHPD), what plans will be prepared to monitor or protect identified resources, and how the petitioner intends to comply with Chapter 6E, HRS, related to historic preservation, and the CZM objective and policies for historic resources contained in Sections 205A-2(b) and (c). SHPD has information and guidance available at <http://hawaii.gov/dnr/hpd/hpgrtg.htm>.

The EA/EIS document should identify any cultural resources and cultural practices associated with the property, including visual landmarks, if applicable, and discuss the impact of the proposed project on identified cultural resources and practices as well as proposed mitigation measures. The LUC is obligated

under Article XII, Section 7 of the Hawai'i State Constitution to protect the reasonable exercise of customarily and traditionally exercised native Hawaiian rights. Thus, the LUC requires information as to the presence of cultural resources and cultural practices associated with the project site and vicinity for decision-making on petitions. The State Office of Environmental Quality Control provides guidance for preparing a cultural assessment at <http://oeqc.doh.hawaii.gov>, at "Environmental_Assessment_PrepKit" (http://oeqc.doh.hawaii.gov/Shared%20Documents/Preparation_of_Hawaii_Environmental_Policy_Act_Documents/Guidance_on_Cultural_Impact/1997%20Cultural%20Impacts%20Guidance.pdf)

6. **Biota.** The EA/EIS should include an inventory and assessment of flora and fauna, including invertebrates, found on or in proximity to the project site and in any lava tubes and caves on the property that are listed on the federal or State list of endangered or threatened species. Please also discuss species of concern and candidates for listing. The petitioner should consult with the Database Manager at the Hawai'i Biodiversity and Mapping Program, Center for Conservation Research and Training, University of Hawai'i, (808) 956-8094, as to the potential for the presence of rare species in the project area. The EA/EIS should discuss measures to be taken to protect rare, threatened, or endangered species or ecosystems of concern as required by law. The design of the biological survey should consider both wet and dry season observations to capture the fullest range of flora and fauna.
7. **Wastewater Treatment and Disposal.** The EA/EIS needs to identify the anticipated volume of wastewater to be generated by type of user, as well as the proposed means of wastewater treatment and disposal. A discussion of the availability of County wastewater collection and treatment capacity and its existing service levels, design capacity, and allocated capacity is also needed. The EA/EIS should also identify whether any facility improvements would be required to accommodate additional wastewater generated within the service area, including the proposed project. If a private wastewater treatment system is identified as the preferred option, the EA/EIS should discuss the type of plant to be used, permitting requirements, plans for reuse and/or disposal of treated effluent and waste solids, and how the private system will be operated and maintained.
8. **Energy Use and Impacts.** The State Hawai'i Clean Energy Initiative has adopted a goal of using efficiency and renewable energy resources to meet 70 percent of Hawai'i's energy demand by 2030, with 30 percent from efficiency measures and 40 percent from locally-generated renewable sources. The EA/EIS should quantify the projected energy requirements of the project and discuss measures to be taken to reduce energy demand, promote energy efficiency, and to promote use of alternative, renewable energy sources. Please discuss how energy efficiency and energy demand reduction, including reduced transportation energy use will be incorporated in the design of the project and identify the kinds of green building and sustainable design practices that could be used to promote energy and resource conservation in the proposed project. Please also identify any generating or transmission capacity constraints that may arise as a result of the proposed project and other projects planned for the region.
9. **Impact on State Facilities and Resources.** The EA/EIS should quantify the impacts of the proposed project on State-funded facilities, including schools, highways, harbors, and airports, and discuss these impacts in terms of existing and planned capacity of the impacted facilities. The EA/EIS should cite the mitigation measures proposed to be used in the development of the project and describe efforts to address identified State agency concerns. Regarding transportation impacts, consider project design options that limit the need to drive, including mixed land uses, compact site design, walkable neighborhoods, and providing a variety of transportation choices (e.g., biking, public transit, etc.).
10. **Conservation District.** If the proposed project is within the State Conservation District, the EA/EIS should provide an inventory of conservation resources, and discuss how the loss of these resources (habitat, watershed area, etc.) will impact the public.

11. **Conformance with County Plan Designations and Urban Growth or Rural Community Boundaries.** Act 26, Session Laws of Hawai'i 2008, reaffirmed the Land Use Commission's duty to consider any proposed reclassification with respect to the Counties' adopted general, community, or development plans. If the proposed project is not consistent with the County plans or lies outside a County urban growth or rural community boundary, the EA/EIS should provide an analysis and discussion of the following:
 - a. **Alternative Sites Considered.** Describe and discuss alternative sites that were considered for the project, and discuss why the project could not be accommodated on lands within the urban growth or rural community boundary, if the county plan delineates such boundaries, or on land already designated by the county for similar uses.
 - b. **Impact on Surrounding Lands.** Discuss what the impacts of changing the county plan designation or extending the urban growth or rural community boundary would have on the surrounding lands.
 - c. **Significant Public Benefit.** Discuss what, if any, public benefits are provided by the proposed project above that already required under existing approval and permitting requirements.
 - d. **Plan Amendment.** Provide a timeframe for application for and approval of any required plan amendment.
12. **Environmental Health Hazards.** The EA/EIS should discuss the potential for the project or project users to generate hazardous materials or release possible contaminants to the air, soil, or water, as well as measures to be taken to ensure that environmental and public health and safety will be protected during construction and after buildout. The EA/EIS should also identify and discuss any potential health and environmental threats that may be present due to site-specific contamination from past or current use. If contaminants of concern are identified for the project site, OP recommends that the petitioner consult with the State Department of Health's Hazard Evaluation and Emergency Response Office as to measures to be taken to address possible or actual contamination at the site.
13. **Solid Waste Management.** The EA/EIS should quantify the volume of solid waste likely to be generated by the project by types of users, and describe the impact the project will have on the County's existing and planned capacity for managing solid waste as represented in the County's solid waste management plan. The EA/EIS should discuss specific mitigation measures to be taken to reduce solid waste generation and ensure that recycling and reuse are incorporated within the project area by residential, commercial, and institutional users.
14. **Sustainability Analysis.** OP is implementing the sustainability elements of the State Administration's New Day Comprehensive Plan and Act 181, Session Laws of Hawai'i (SLH) 2011 (the new sustainability priority guideline of the Hawai'i State Planning Act) by asking petitioners to prepare sustainability plans for their projects in anticipation of district boundary amendment proceedings before the LUC. LUC Dockets A06-771, DR Horton-Schuler Homes (Ho'opili) and A11-793, Castle & Cooke Homes (Koa Ridge Makai/Castle & Cooke Waiawa) provide a good point of reference for sustainability plans. The Koa Ridge Sustainability Plan and Ho'opili Sustainability Plan can be found on the LUC's web site under each respective docket's exhibits. Links to additional helpful resources can be found at the OP website at http://hawaii.gov/dbedt/op/land_use.htm.

OP evaluates sustainability plans based on the *Healthy Community Design Smart Growth Checklist* prepared by the Hawai'i State Department of Health, Built Environment Working Group, which recommends that State and county planning departments, developers, engineers, and other professionals apply healthy built environment principles when they plan or review new

developments or redevelopments. See <http://hawaii.gov/health/environmental/env-planning/landuse/hcdchecklist.pdf>.

The *Checklist* is adapted from the *Smart Scorecard for Development Projects* (Congress for New Urbanism and the U.S. Environmental Protection Agency, 2002) and *East Garrison Smart Growth Checklist* (Monterey, CA). The checklist applies Smart Growth principles to accomplish the following:

- Promote fitness through safe walking, biking, and other active transportation through connectivity of planned bikeways and paths with existing and adjacent networks, designing travelways that connect multiple destinations and encourage non-vehicular travel.
- Promote clean air by making transit convenient and comfortable, minimizing petroleum-fueled car and truck use, and minimizing fossil energy use.
- Promote a healthy environment by buying green products, reducing, reusing, and recycling, and minimizing waste in construction, operations, and demolition.
- Promote fitness and health by encouraging home and community gardens.

Factors to consider include Close Proximity to Existing/Future Development and Infrastructure; Site Optimization and Compactness; Mix and Balance of Uses; and Accessibility and Mobility Choices. The *Checklist* is flexible so that developers can implement what works for their particular development. It is also consistent with the objectives of Act 181, SLH 2011, and can help petitioners address reasonably foreseeable impacts caused by a proposed project on areas of State concern listed under Section 205-17, HRS.

15. **Development Timetable.** The LUC requires that projects seeking reclassification be substantially completed within ten years or seek incremental approvals, pursuant to Section 15-15-50, HAR. The EA/EIS and/or petitioner should provide a schedule of development for each phase of the total project and a map showing the location and timing of each phase or increment of development. Regarding infrastructure (e.g., highway improvements), the petitioner should discuss how improvements will be completed to ensure that mitigation coincides with the impact created by the proposed project.



1907 South Berelania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Jesse K. Souki, Director
State of Hawai'i
Department of Business, Economic Development & Tourism
Office of Planning
P.O. Box 2359
Honolulu, Hawai'i 96804

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhī, Līhu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Souki:

Thank you for your letter dated September 21, 2012 (Ref. No. P-13721) regarding the subject project. We offer the following responses in the order of your comments:

1. We acknowledge that your Department will evaluate whether the proposed project meets the State Land Use Commission's (LUC) decision-making criteria in §205-17, Hawai'i Revised Statutes (HRS). The State Land Use District Boundary Amendment Petition and Draft EA will discuss the project's conformance with the Coastal Zone Management objectives and policies in §205A-2, HRS, and consistency with the applicable objectives and policies of Chapter 226, Hawai'i State Plan, HRS.
2. The Draft EA and Petition will address the following Issues of Concern in District Boundary Amendment Proceedings Based on LUC Decision-Making Criteria:
 1. **Water Resources.** The Draft EA will include discussion of the surface waters and ground water resources within and in the nearby vicinity of the Petition Area, and potential impacts associated with the proposed project. The Draft EA will also include discussion of the potable and non-potable water sources to be used for the project.
 2. **Agricultural Lands.** The Draft EA will identify agricultural activities currently occurring in the nearby vicinity of the Petition Area, and discuss the impact of the existing campus and proposed master plan improvements on agricultural-designated land within and adjoining the Petition Area.
 3. **Affordable Housing.** As the proposed project is an update of the Island School master plan to accommodate additional campus facilities for



future expansion of its student body enrollment, the County's workforce housing policy (Ordinance No. 860) is not applicable to the project.

4. **Coastal Zone Management (CZM).** The Draft EA will include the definition of the coastal zone as set forth in §205A-1, HRS. The Draft EA will discuss the project's consistency with the CZM program objectives and policies under Section 205A-2, HRS, including the following:
 - a. **Coastal and Ocean Resources.** The Draft EA will discuss the potential impacts of the proposed project on coastal ecosystems, and appropriate structural and/or non-structural best management practices (BMPs) to mitigate such impacts.
 - b. **Coastal and Other Hazards.** The Draft EA will include discussion of the hazard risks that are relative to the Petition Area, and measures proposed to mitigate such hazard impacts. The Draft EA will also include discussion of the proposed project with respect to the relevant aspects of the *State of Hawaii's Multi-Hazard Mitigation Plan, 2010 Update*, and the *County of Kaua'i Multi-Hazard Mitigation Plan, Update 2009*, as deemed appropriate.
 - c. **Coastal-dependent Uses and Beach Protection.** As the Petition Area is located approximately 2.7 miles inland (northwest) from the shoreline, the proposed project will not impact beach systems or public access to beaches, and will not involve the construction of improvements in the shoreline setback or require any erosion-protection structures. This information will be included in the Draft EA.
 - d. **Coastal Recreational Resources.** As the Petition Area is located approximately 2.7 miles inland (northwest) from the coastline, the proposed project will not provide or impact coastal recreational opportunities accessible to the public. This information will be included in the Draft EA.
 - e. **Scenic Resources.** As the Petition Area is located approximately 2.7 miles inland (northwest) of the coastline, the proposed project will not affect scenic resources or public views to and along the shoreline. This information will be included in the Draft EA.
 - f. **Special Management Area (SMA) Permitting.** The Petition Area is located outside of the SMA boundaries and, therefore,



does not require a SMA Use Permit. This information will be included in the Draft EA.

5. **Cultural, Archaeological, and Historic Resources.** An archaeological literature review and field inspection report has been prepared for the Petition Area, and will be included in the Draft EA. The Draft EA will include discussion of consultation with the State Historic Preservation Division (SHPD), and consistency with the CZM objectives and policies for historic resources contained in Sections 205A-2 (b) and (c), HRS.

A cultural impact assessment (CIA) was undertaken as part of the EA prepared in conjunction with the proposed State Land Use District Boundary reclassification of the Kaua'i Community College campus located adjacent to and south/southwest of the Petition Area. The study area of the CIA includes the ahupua'a of Nāwiliwili, Niūmalu, and Ha'ikū within the Līhu'e District, of which the Petition Area is located within the Nāwiliwili Ahupua'a. The CIA will be included in the Draft EA.

6. **Biota.** A botanical and fauna survey was conducted of the Petition Area and will be included in the Draft EA. The Draft EA will include a discussion of the potential impacts and mitigation measures to protect candidate for listing, threatened or endangered species.

Although the botanical field survey was conducted in August 2010 (dry season), the Petition Area is within a relatively wet area in the lowlands of Kaua'i. The Petition Area has been, and is further proposed to be, modified by campus improvements and activities. There is no habitat within the Petition Area that would support native or rare plants. All of the native species recorded within the Petition Area were found around the Hawaiian cultural pavilion within the south-central portion of the site where the school has re-vegetated the area with native species. This information will be included in the Draft EA.

7. **Wastewater Treatment and Disposal.** The Draft EA will include discussion of the existing wastewater system for the Island School campus and projected volume of wastewater to be generated by the proposed project.
8. **Energy Use and Impacts.** The Draft EA will include discussion of the existing and proposed sustainable measures employed by Island School to promote renewable energy sources and energy efficiency.
9. **Impact on State Facilities and Resources.** A Traffic Impact Report was prepared to assess the potential traffic impacts resulting from the



proposed project on the existing roadways within the vicinity of the Petition Area, and will be included in the Draft EA.

The proposed project is not anticipated to adversely affect existing schools on Kaua'i or in the Līhu'e/Puhi region. The new campus facilities to accommodate future increase in student enrollment could reduce the burden on public school facilities in the area. This information will be included in the Draft EA.

The Draft EA will include discussion of sustainable transportation options provided by Island School to reduce the use of automobiles.

10. **Conservation District.** As the Petition Area is currently designated within the State Agricultural District, the proposed project will not impact the State Conservation District.

11. **Conformance with County Plan Designations and Urban Growth or Rural Community Boundaries.** The County of Kaua'i General Plan designation for the Petition Area is Agriculture. Island School is proposing to amend the Petition Area's County General Plan land use designation from Agriculture to Urban Center prior to petitioning for the State Land Use District Boundary Amendment from the State Agricultural District to the Urban District.

The County of Kaua'i's Līhu'e Development Plan, adopted by County Ordinance in 1976, designates the Petition Area as Agriculture. The Petition Area and surrounding lands were previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s. Since 1990, the majority of the Petition Area (approximately 30 acres) has been developed into the Island School campus, with the remaining 8.448 acres within the north-central and eastern portions of the Petition area currently undeveloped and vegetated with forest, shrubland, and grassland areas. The Petition Area is rendered unsuitable for intensive agricultural uses given its use as a school since 1990.

- a. **Alternative Sites Considered.** Since 1990, the majority of the Petition Area (approximately 30 acres) has been developed into the Island School campus consisting of classroom, administration and various other facility buildings; athletic/recreational fields; and, school parking and road access facilities. The proposed updated master plan improvements will extend into the remaining 8.448 acres of the Petition Area. Given the current nature of the Petition Area as the Island School campus, alternative sites with existing urban designations were not considered. The need to reclassify the Petition Area from the State Agricultural District to the Urban



District, and from the County General Plan Agriculture designation to the Urban Center designation, is to be more consistent with its current urban character as a school campus, as well as with the existing urban lands and developments in the vicinity makai of Kaunuali'i Highway. The reclassification of the Petition Area will allow the improvements within the proposed updated Island School master plan to be implemented without a State Special Permit.

- b. **Impact on Surrounding Lands.** The Draft EA will include discussion of the potential impacts that the proposed County General Plan Amendment would have on the surrounding lands.
- c. **Significant Public Benefit.** The Draft EA will include discussion of public benefits that may be provided by the proposed project.
- d. **Plan Amendment.** The Draft EA will include a timeframe for the processing and approval of the State Land Use District Boundary Amendment and County General Plan Amendment for the proposed project.

12. **Environmental Health Hazards.** As the Petition Area was previously in sugar cane cultivation by the Līhu'e Plantation Company, Ltd. until the late 1980s, the Draft EA will include discussion of potential environmental hazards due to past use of agricultural chemicals.

Due to its use as a school campus, the project is not anticipated to release any hazardous materials into the environment during construction and operation of the proposed improvements. This information will be included in the Draft EA.

13. **Solid Waste Management.** During construction of the project, a trash management and recycling program will be developed and implemented to minimize solid waste disposal at the County's Kekaha Landfill. This information will be included in the Draft EA. The Draft EA will also include a discussion of the existing and proposed solid waste recycling, diversion and disposal programs and practices of Island School.
14. **Sustainability Analysis.** The Draft EA will include a discussion of sustainable strategies that are ongoing within the Island School campus, or may be created for the proposed project.
15. **Development Timetable.** The Draft EA will include the anticipated development schedule for the proposed project.

8110-03

Letter to Mr. Souki

October 19, 2012

Page 6



3. According to the County of Kaua'i Planning Department, the final recommendations of the County of Kaua'i Important Agricultural Lands (IAL) Study have yet to be adopted, although the priority for County-led IAL designation does not include the Island School Petition Area. The majority of the adjacent Kaua'i Community College campus does not have an IAL score since the area is designated Urban Center in the County of Kaua'i General Plan. This information will be included in the Draft EA.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Earl Matsukawa', written over a horizontal line.

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
GOVERNOR

MAJOR GENERAL DARRYL D. M. WONG
DIRECTOR OF CIVIL DEFENSE

DOUG MAYNE
VICE DIRECTOR OF CIVIL DEFENSE



STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

August 30, 2012



PHONE (808) 733-4300
FAX (808) 733-4287



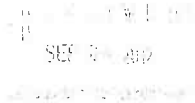
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Doug Mayne, Vice Director of Civil Defense
State of Hawai'i
Department of Defense
Office of the Director of Civil Defense
3949 Diamond Head Road
Honolulu, Hawai'i 96816-4495

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihue District, Island of Kauai, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street
Suite 400
Honolulu, Hawaii 96826



Dear Mr Matsukawa:

Pre-Assessment Consultation for
Draft Environmental Assessment (EA) for Island School
TMK: (4) 3-8-002:016, Puhi, Lihue District, Kauai, Hawaii

Thank you for the opportunity to comment on this proposed project.

After review of the documents provided, we find that the proposed parcel is covered by the arc of an existing warning siren.

Mitigation measures should be considered in planning and the design phase of any new construction, as mitigation prevents loss of life, minimizes loss of property, and plans for continuity of essential services. Generally, the cost of integrating mitigation measures during construction is approximately one-third the cost of post-construction retrofit.

If you have any questions please call Ms. Havinne Okamura, Hazard Mitigation Planner, at 733-4300, extension 556.

Sincerely,

DOUG MAYNE
Vice Director of Civil Defense

Dear Mr. Mayne:

Thank you for your letter dated August 30, 2012, indicating that the proposed project parcel is covered by the arc of an existing warning siren. This information will be included in the Draft EA.

We also appreciate and understand your recommendation to incorporate mitigation measures for safety and protection of property and essential services to Island School for consideration in the future facility planning and implementation.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

September 14, 2012

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
File:
12-152
DEA Island School



1907 South Beretania Street
Arlesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Ms. Laura Leialoha Phillips McIntyre, AICP
Environmental Planning Office Manager
State of Hawai'i
Department of Health
Environmental Health Administration
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

SUBJECT: Pre-Assessment Consultation, Draft Environmental Assessment for Island School, TMK: (4) 3-8-002: 016, Puhi, Lihue, Island of Kauai

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter, dated **August 20, 2012**. Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. We strongly recommend that you review all of the Standard Comments on our website: www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this application should be adhered to.

The United States Environmental Protection Agency (EPA) provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: <http://water.epa.gov/infrastructure/sustain/>. The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me.

Sincerely,

Laura Leialoha Phillips McIntyre, AICP
Environmental Planning Office Manager
Environmental Health Administration
Department of Health
919 Ala Moana Blvd., Ste. 312
Honolulu, Hawaii 96814
Phone: 586-4337
Fax: 586-4370
laura.mcintyre@doh.hawaii.gov

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihue District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Ms. McIntyre:

Thank you for your letter dated September 14, 2012 (File: 12-152 DEA Island School) indicating you have no comments at this time. The Standard Comments included on the Department's referenced website will be reviewed and adhered to, as applicable to the project.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

September 25, 2012

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
File:

LUD-4 3 8 002 016-ID1075
PreAssmnt DEA Island School



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Ms. Sina Pruder, P.E., Acting Chief
State of Hawai'i
Department of Health
Wastewater Branch
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Ms. Pruder:

Thank you for your letter dated September 25, 2012 (Ref: LUD-4 3 8 002 016-ID1075 PreAssmnt DEA Island School) regarding the subject project.

Wastewater service for the Island School campus is provided by Grove Farm Company, Inc.'s Puhi Wastewater Treatment Plant, a privately-owned and operated facility located southeast of the Petition Area and makai of Kaumuali'i Highway. The Draft EA will include a discussion of the wastewater system for Island School.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

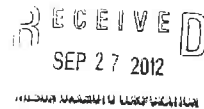
Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza Suite 400
Honolulu, Hawaii 96826



Dear Mr. Matsukawa:

Subject: Pre-Assessment Consultation Draft Environmental Assessment
Island School, 3-1875 Kaumualii Highway, Lihue, Kauai 96766
TMK (4) 3-8-002: 016

Thank you for allowing us the opportunity to review the above subject project which requests comments on the Pre-Assessment Consultation Draft Environmental Assessment for Island School. We have the following comment to provide for the subject project.

If connection to a Private or County sewer system is not available, domestic wastewater generated by the proposed project shall be handled by wastewater systems that comply with our Chapter 11-62, Hawaii Administrative Rules.

Should you have any questions, please contact our branch at telephone 586-4294 or fax to 586-4300.

Sincerely,

SINA PRUDER, P.E., ACTING CHIEF
Wastewater Branch

LM:mt

c: DOH-Environmental Planning Office (12-152), Ms. Laura McIntyre
DOH-WWB's Kaula Staff, Ms. Lori Vetter

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

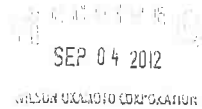
3060 Eiwa Street, Room 208
Lihue, Hawaii 96766
PHONE: (808) 274-3491
FAX: (808) 241-3535
August 29, 2012

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCES MANAGEMENT



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
ATTENTION: Mr. Earl Matsukawa, AICP



Dear Mr. Matsukawa,

After reviewing the proposed update to the Island School master plan, the Department of Land and Natural Resources, Land Division, Kauai District Branch has no objections.

Sincerely,

Marvin Mikasa
Land Agent

cc: District Files
Central Files

8110-03
October 19, 2012

Mr. Marvin Mikasa, Land Agent
State of Hawai'i
Department of Land and Natural Resources
Land Division, Kaua'i District Branch
3060 'Eiwa Street, Room 306
Lihue, Hawai'i 96766

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihue District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Mikasa:

Thank you for your letter dated August 29, 2012, indicating that your Branch has no objections to the proposed project.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCHROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

WILLIAM J. AILA, JR.
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

PAUL J. CONRY
INTERIM PAIST OFFICER

WILLIAM M. TAM
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF SURVEYANCE
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL ZONE
CORRECTION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIKOOE ISLAND RESERVE COMMISSION
LAND
STATE PARKS



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Dr. Puuallaokalani D. Aiu, Administrator
State of Hawai'i
Department of Land and Natural Resources
Historic Preservation Division
P.O. Box 621
Honolulu, Hawai'i 96809

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhī, Līhu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Dr. Aiu:

Thank you for your letter dated September 18, 2012 (Ref: LOG NO: 2012.2605, 2012.2518, DOC NO: 1209SL15 Archaeology) regarding the subject project.

An Archaeological Literature Review and Field Inspection report for the subject project has been prepared by Cultural Surveys Hawai'i, Inc. (October 2010) and submitted to and received by your department on January 11, 2011 for review. The Archaeological Literature Review and Field Inspection report will be included in the Draft EA.

We acknowledge that although the subject property was formerly used as agricultural land, the potential exists for subsurface historic properties below the cultivation zone. As recommended, ground disturbing activities associated with the proposed project will be monitored by a qualified archaeologist, and an archaeological monitoring plan will be prepared and submitted to your department for review and approval. The monitoring plan will include information as specified in Hawai'i Administrative Rule §13-279-4. This information will be included in the Draft EA.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

September 18, 2012

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
ematsukawa@wilsonokamoto.com

Dear Mr. Earl Matsukawa:

**SUBJECT: Chapter 6E-8 Historic Preservation Review--
Pre-Assessment Consultation, Draft Environmental Assessment,
Proposed Update of the "Island School" Master Plan
Puhī Ahupua'a, Līhu'e District, Island of Kaua'i
TMK: (4) 3-8-002:016**

Thank you for the opportunity to review your document titled *Pre-Assessment Consultation, Draft Environmental Assessment (EA), Island School, Tax Map Key: (4) 3-8-002:016 Puhī, Līhu'e District, Island of Kaua'i, Hawai'i* which was received in our Kapolei office on August 21, 2012. The Island School campus consists of about 38,448 acres, which Island School seeks to reclassify from the State Agricultural District to the State Urban District, and to update its master plan to accommodate additional campus facilities. The school has constructed campus facilities on the property since relocating to the current Puhī location through the granting of several Special Permits, Use Permits, Variance Permits, and Class IV Zoning Permits. The proposed master plan includes new and expanded buildings and structures, including track, football, soccer, and baseball fields, playgrounds, a swimming pool, roads, parking, and so forth.

A review of our records indicates that no archaeological inventory survey has been conducted within the Island School property. Although the property formerly was used as agricultural land, potential exists for subsurface historic properties below the cultivation zone. SHPD recommends that ground disturbing activities associated with this reclassification and updating of the Island School Master Plan be monitored by a qualified archaeologist. We request that the applicant submit an archaeological monitoring plan that includes this more recent work to our office for review and approval; the plan should include all information as specified in Hawai'i Administrative Rule §13-279-4. We will notify your office when the plan has been approved and work may proceed. Please contact Susan A. Lebo at (808) 692-8019 or Susan.A.Lebo@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha

Puuallaokalani D. Aiu
Administrator

cc: Steve Molmen, Supervising Land Agent, DLNR
steve.molmen@hawaii.gov

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

GLENN M. OKIMOTO
DIRECTOR

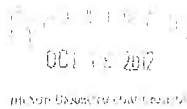
Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:

STP 8.0995

October 8, 2012

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania, Suite 400
Honolulu, Hawaii 96826



Dear Mr. Matsukawa:

Subject: Island School
Pre-Assessment for Draft Environmental Assessment
TMK: (4) 3-8-002:016

The State Department of Transportation (DOT) previously commented on the subject project in its letter STP 8.0979 dated September 24, 2012 (attached) and now offers the following supplemental comments.

A Traffic Impact Analysis Report (TIAR) should be prepared for our review. We reserve further comment until the TIAR has been submitted and reviewed. A copy of the TIAR should also be provided to the Highways Division, Kauai District Engineer for review.

The DOT appreciates the opportunity to provide comments. If there are any questions, including the need to meet with DOT staff, please contact Mr. Garrett Smith of the STP Office at 831-7976.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation

Attachment: Ltr. STP 8.0979 @td. 09/24/12

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:

STP 8.0979

September 24, 2012

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Island School
Pre-Assessment for Draft Environmental Assessment
TMK: (4) 3-8-002:016

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project.

DOT understands Island School is proposing to update its master plan to accommodate additional campus facilities for future expansion.

DOT appreciates the opportunity to provide comments; however, we do not have any comments at this time. Please continue to consult us on any land development projects that may have potential highway facilities impacts.

If there are any questions, including the need to meet with DOT staff, please contact Mr. Garrett Smith of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation



8110-03
October 19, 2012

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Glenn M. Okimoto, Ph.D., Director
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, Hawai'i 96813-5097

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Okimoto:

Thank you for your letters dated September 24, 2012 (Ref: STP 8.0979) and October 8, 2012 (Ref: STP 8.0995) regarding the subject project.

A Traffic Impact Report has been prepared for the subject project and will be included in the Draft EA. Copies of the Draft EA will be submitted to your Department and the Highways Division, Kaua'i District for review.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

Bernard P. Carvalho, Jr.
Mayor



Gary K. Heu
Managing Director

DEPARTMENT OF PUBLIC WORKS
Solid Waste Division
County of Kauai, State of Hawaii
4444 Rice Street, Suite 275, Lihue, Hawaii 96766
TEL (808) 241-4839 FAX (808) 241-6887
September 4, 2012

Larry Dill, P.E.
County Engineer

Lyle Tabata
Deputy County Engineer

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826
Attention: Mr. Earl Matsukawa

SUBJECT: Proposed Island School Master Plan Update

Dear Mr. Matsukawa,

We acknowledge receipt of your letter regarding the proposed Island School master plan update. We understand that the project is subject to an Environmental Assessment, and as part of that process, you are soliciting our comments. The Division of Solid Waste Management (DSWM) has prepared the following recommendations based on the key objective to divert recyclable and salvageable material from the landfill to the greatest extent possible.

The DSWM recommends the Owner develop and submit, for DSWM for approval, a project specific Solid Waste Management Plan, which includes Sections to address Construction and Demolition Debris Diversion and Operations Phase Recycling for solid waste generated on the property.

The Construction and Demolition Debris Diversion section should identify all materials to be managed during the construction phase of the project, and for each material, provide the estimated quantity, and the proposed method of diversion or disposal. The section should also describe a method for tracking the disposition of debris materials during the course of the project for inclusion in a final report summarizing debris diversion and disposal activities.

On a related note, the County Public Works Department is in the process of drafting an ordinance that will require all permitted construction projects exceeding \$100,000 in value to develop and implement Construction and Demolition Debris Diversion Plans, and to provide final reports on such projects. Designated recyclable materials specified by ordinance shall be recycled at a rate of 90%.

Consistent with the County's Zero Waste Resolution, the Operations Phase Recycling section should describe an ongoing recycling program for the Island School including expansion

An Equal Opportunity Employer

Wilson Okamoto Corporation
Master Plan Update for Island School
September 4, 2012
Page 2 of 2

facilities. The section should include information on collection, anticipated processing and transport methods, and destination facilities for all items anticipated to be diverted from the landfill.

The applicant's plan should demonstrate compliance with Section 21-3.3 and Section 21-7.3 of the Kauai County Code 1987 as amended which restrict disposal of certain solid waste materials generated by business, industrial, and other nonresidential sources from the County landfill including green waste, cardboard, metals, liquids, hazardous wastes, tires, and LCD and CRT monitors.

We understand that Island School has a commitment to Zero Waste principles, and implements such programs on campus already. The recommendations above are consistent with the school's existing philosophies and activities. Should you have questions, please contact Allison Fraley at (808) 241-4837.

Sincerely,

Handwritten signature of Troy Tanigawa in black ink.

TROY TANIGAWA, P.E.
Environmental Services
Management Engineer

Concur:

Handwritten signature of Larry Dill in black ink.

LARRY DILL, P.E.
County Engineer

af/tkt

cc: Environmental Services Officer
Planning Department



8110-03
October 19, 2012

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Troy Tanigawa, P.E., Environmental Services Management Engineer
County of Kaua'i
Department of Public Works
Division of Solid Waste Management
4444 Rice Street, Suite 275
Līhu'e, Hawai'i 96766

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Līhu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Tanigawa:

Thank you for your letter dated September 4, 2012 regarding the subject project.

During construction of the project, a trash management and recycling program will be developed and implemented to minimize solid waste disposal at the County's Kekaha Landfill. This information will be included in the Draft EA.

The Draft EA will also include a discussion of the existing and proposed solid waste recycling, diversion and disposal programs and practices of Island School.

We acknowledge that the County Department of Public Works (DPW) is in the process of drafting an ordinance that will require all permitted construction projects exceeding \$100,000 in value to develop and implement Construction and Demolition Debris Diversion Plans, and to provide final reports on such projects.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

8110-03
August 20, 2012



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Edward Tschupp, Chief
County of Kaua'i
Department of Public Works
Wastewater Management Division
4444 Rice Street, Suite 500
Lihu'e, HI 96766

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Tax Map Key: (4) 3-8-002: 016
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i

Dear Mr. Tschupp:

On behalf of Island School, Petitioner, Wilson Okamoto Corporation is currently preparing a Draft Environmental Assessment (EA) pursuant to Chapter 343, Hawai'i Revised Statutes (HRS) for the proposed update of the Island School master plan located on a 38.448-acre campus in Puhi, Lihu'e District, Island of Kaua'i. A Project Summary, Location Map, Tax Map, State Land Use Districts Map, County of Kaua'i General Plan Land Use Map, and Conceptual Master Site Plan of the proposed project are enclosed for your information.

The proposed project is subject to Chapter 343, HRS and Chapter 200 of Title 11, Department of Health Administrative Rules since a County General Plan Amendment is required.

As part of the EA process, we are soliciting comments you may have on the proposed project. Please submit your written comments to:

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawai'i 96826
ATTENTION: Mr. Earl Matsukawa, AICP

We would appreciate your written comments by September 21, 2012. Comments may also be faxed to our office at (808) 946-2253.

Should you have any questions, please call me at (808) 946-2277.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. David Pratt, Island School



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 26, 2012

Mr. Edward Tschupp, Chief
County of Kaua'i
Department of Public Works
Wastewater Management Division
4444 Rice Street, Suite 500
Lihu'e, Hawai'i 96766

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Tschupp:

Thank you for your comments dated October 26, 2012 indicating that the proposed project is not in a County sewer service area.

Wastewater service for the Island School campus is provided by Grove Farm Company, Inc.'s Puhi Wastewater Treatment Plant, a privately-owned and operated facility located southeast of the Petition Area and makai of Kaunuaui'i Highway. The Draft EA will include a discussion of the wastewater system for Island School.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

COMMENTS:
PROPOSED PROJECT IS NOT IN
A COUNTY SEWER SERVICE AREA.
APPLICANT SHALL COMPLY WITH
REQUIREMENTS OF STATE DEPT.
OF HEALTH FOR WASTEWATER.
STE 10/26/12

Bernard P. Carvalho, Jr.
Mayor

Gary K. Heu
Managing Director



KAUAI CIVIL DEFENSE AGENCY
3990 Kaana St., Suite 100, Lihue, Hawaii 96766
TEL (808) 241-1800 FAX (808) 241-1860

September 4, 2012

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826
ATTN: Mr. Earl Matsukawa, AICP

RE: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Tax Map Key: (4) 3-8-002:016
Puhi, Lihue District, Island of Kauai, Hawaii

Dear Mr. Matsukawa:

Thank you for allowing me to comment on the Draft Environmental Assessment for the proposed update of the Island School master plan located in Puhi, Kauai, Hawaii. I have no comment to this proposed project.

If you have any questions, please call me at 241-1800. Thank you.

Sincerely,


Theodore A. Daligdig, III
Civil Defense Manager

Theodore A. Daligdig, III
Manager, Civil Defense

RECEIVED
SEP 07 2012



1907 South Beretania Street
Arlisian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Theodore A. Daligdig, III, Civil Defense Manager
County of Kauai
Kauai Civil Defense Agency
3990 Ka'ana Street, Suite 100
Lihue, Hawaii 96766

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puhi, Lihue District, Island of Kauai, Hawaii
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Daligdig:

Thank you for your letter dated September 4, 2012, indicating that you have no comment to the proposed project.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,


Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

Earl Matsukawa

From: Daryl Date [DDate@kauai.gov]
Sent: Wednesday, September 19, 2012 9:04 AM
To: Earl Matsukawa
Subject: Island School
Mr. Earl Matsukawa

In response to your request for comments for the draft environmental assessment for the Island School expansion project, the Kaua'i Fire Department would like to inform you that the current adopted fire code is the 2006 NFPA 1 Uniform Fire Code. Areas of concern that will be looked at will be fire department access, fire alarm systems, and fire protection such as on-site fire hydrants.

Should you have any questions please call.

Daryl Date

Fire Prevention Captain
Kaua'i Fire Department
4444 Rice St., Suite 315
Lihu'e, HI 96766
Ph. 808-241-4982
Cell: 808-645-6353
Fax: 808-241-6508



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
October 19, 2012

Mr. Daryl Date, Fire Prevention Captain
County of Kaua'i
Fire Department
4444 Rice Street, Suite 315
Lihu'e, Hawai'i 96766

Subject: Pre-Assessment Consultation
Draft Environmental Assessment (EA)
Island School
Puihi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Date:

Thank you for your comments sent via e-mail dated September 19, 2012 regarding the subject project.

We acknowledge that the current adopted fire code is the 2006 NFPA 1 Uniform Fire Code, and that the areas of concern will include Fire Department access, fire alarm systems, and fire protection such as on-site fire hydrants.

Your letter, along with this response, will be included in the forthcoming Draft EA. We appreciate your participation in the pre-assessment consultation review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa", written over a white background.

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

Draft Environmental Assessment Consultation Correspondence



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850



DEC 26 2012

In Reply Refer To:
2013-TA-0052

RECEIVED
DEC 28 2012

WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii 96826

Subject: Technical Assistance for the Island School Master Plan Draft Environmental Assessment, Kauai

Dear Mr. Matsukawa:

The U.S. Fish and Wildlife Service (Service) received your letter on November 20, 2012, requesting our comments to the draft Environmental Assessment (EA) for the proposed update to the Island School Master Plan. The Island School campus is located on a 38.5-acre parcel in Puhi on the island of Kauai [TMK (4) 3-8-002:016]. The update to the school's Master Plan will reclassify the campus parcel from State Agricultural District to State Urban District and amend the County of Kauai General Plan Land Use Map from the 'Agricultural' to 'Urban Center' designation. The purpose of this reclassification is to allow improvements within the Island School Master Plan to be implemented without a State Special Permit. The updated Master Plan includes new and expanded classrooms and facilities, recreational sport fields, outdoor pool, residences, a 200 kilowatt solar facility, 145 new parking spaces and additional infrastructure. We thank Mr. Earl Matsukawa for the two-day time extension to December 26, 2012, to submit our comments.

We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program and the Hawaii GAP Program. Our data indicate that the federally endangered Hawaiian stilt (Himantopus mexicanus knudseni), endangered Hawaiian moorhen (Gallinula chloropus sandvicensis), endangered Hawaiian coot (Fulica alai), endangered Hawaiian duck (Anas wyvilliana) (collectively referred to as Hawaiian waterbirds), endangered Hawaiian goose (Branta sandvicensis), and endangered Hawaiian hoary bat (Lasiurus cinereus semotus) may be present in the vicinity of the proposed site. Additionally, the federally threatened Newell's shearwater (Puffinus auricularis newellii), endangered Hawaiian petrel (Pterodroma sandwichensis), and a candidate for listing, the band-rumped storm-petrel (Oceanodroma castro) (collectively referred to as Hawaiian seabirds), may fly over the project area when traversing between the ocean and mountainous breeding colonies.



Mr. Earl Matsukawa

According to our data and your draft EA, several federally listed species have been observed on the proposed project site or traverse the site as in the case of Hawaiian seabirds. From the information presented, it appears there will be the potential for adverse effects to several listed species or their habitats. It is unclear if there is a Federal nexus associated with this project. If there is a Federal nexus (funding) of the proposed school, then that agency must consult with the Service per section 7(a)(2) of the Endangered Species Act (ESA) if the implementation of the proposed project may affect a listed species. If no Federal agency is involved with the project and implementation of the project could result in take of a listed animal species, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. In addition to a Federal incidental take permit, implementation of the plan may also require obtaining a State incidental take license. We recommend that you work with us and the State of Hawaii Department of Lands and Natural Resources-Division of Forestry and Wildlife (DOFAW) to determine if a Habitat Conservation Plan is warranted for this project.

We have enclosed project specific comments in the attached Table that provides more detailed comments regarding the draft EA and the proposed project.

We appreciate your efforts to conserve protected species. If you have questions regarding this letter, please contact Jiny Kim, Consultation and Habitat Conversation Planning Program (phone: 808-792-9400; email: jiny_kim@fws.gov).

Sincerely,

[Signature]
for Loyal Mehrhoff
Field Supervisor

cc: Director of DOFAW, State of Hawaii

Table 1. Specific Comments on the Draft EA.

Table Comment Number	Page Number (in draft EA)	Comment
1	Page 2-3, line 12	The draft EA states that sustainable strategies will include actions to “minimize light pollution, and reduce the potential for interactions of nocturnally-flying seabirds, by shielding exterior lighting within the campus.” We recommend no lights be used during the peak fallout period (September 15 through December 15). If lights cannot be eliminated due to safety or security concerns, then they should be positioned low to the ground, be motion-triggered, and be shielded and/or full cut-off. Effective light shields should be completely opaque, sufficiently large, and positioned so that the bulb is only visible from below. If listed seabirds “fall-out” on the project site due to existing or future lighting, this is considered “take” under the ESA; the applicant must address that “take” pursuant to section 7 or 10 of the ESA.
2	Page 3-14, line 30	The draft EA states “Three of the species recorded, the Hawaiian Goose or Nēnē (<i>Branta sandvicensis</i>), Common Moorhen (<i>Galinula chloropus sandvicensis</i>), and Hawaiian Coot (<i>Fulica alai</i>) are all native and listed as endangered species under both Federal and State of Hawai‘i endangered species statutes. The Nēnē population on Kaua‘i is increasing at a fairly rapid pace, and it is likely that if this increase continues, human interactions with Nēnē will continue to rise over time on the Island. The Common Moorhen and Hawaiian Coot are relatively abundant and widespread on the Island.” If Hawaiian waterbirds or the Hawaiian goose is present on the project site and human interactions may adversely affect the birds or their nesting areas, then that impact needs to be addressed pursuant to the ESA. In addition, our data indicate the federally endangered Hawaiian stilt (<i>Himantopus mexicanus knudseni</i>) and endangered Hawaiian duck (<i>Anas wyvilliana</i>) may also be present in the vicinity of the proposed site and impacts to these species should also be assessed in your final EA.
3	Page 3-15, line 11	The draft EA states “Two other species not detected during the survey, the endangered Hawaiian Petrel (<i>Pterodroma sandwichensis</i>) and the threatened endemic sub-species of the Newell’s Shearwater (<i>Puffinus auricularis newelli</i>) have been recorded flying over the Petition Area between April and the end of November each year. Additionally, the Save Our Shearwaters Program has recovered both species from the general Petition Area on an annual basis over the past three decades. There are no nesting colonies or appropriate nesting habitat for either of these listed seabird species within or close to the Petition Area.” Outdoor lighting, such as nighttime construction and street lights, does adversely impact listed and migratory seabird species. Seabirds fly at night and are attracted to artificially-lighted areas, which can result in disorientation and subsequent fallout due to exhaustion or collision with objects such as utility lines, guy-wires, and towers that protrude above the vegetation layer. Once grounded, they are vulnerable to predators and are often struck by vehicles along roadways. Any increase in the use of nighttime lighting, particularly during each year’s peak fallout period (September 15 through December 15), could result in additional seabird injury or mortality. Impacts to seabirds can

		be minimized by shielding outdoor lights associated with the project to the maximum extent possible, eliminating night-time construction, and providing all project staff and residents with information about seabird fallout. All lights, including street lights, should be shielded so the bulb can only be seen from below and use the lowest wattage bulbs possible. If existing power lines and cables must be altered or replaced or if nighttime construction is proposed June through December, we suggest that you contact our office so that we may assist you in developing appropriate avoidance and minimization measures. The draft EA states that Hawaiian seabirds have been recovered by Save Our Shearwaters on the proposed project area. As previously stated, “fall-out” of listed seabirds due to lighting is considered take and take exemption pursuant to section 7 or 10 of the ESA will be necessary. The final EA should address all potential impacts to seabirds and outline measures to minimize and offset those impacts.
4	Page 3-15, line 22	The draft EA states “The endangered Hawaiian hoary bat (<i>Lasiurus cinereus semotus</i>), or ‘ōpe‘ape‘a as it is known locally, was not detected during the survey, although bats have been recorded within the general Petition Area on a regular basis. Hawaiian hoary bats are widely distributed in the lowland areas on Kaua‘i, and have been documented in and around almost all areas that still have some dense vegetation.” Our data indicate that the federally endangered Hawaiian hoary bat may be present in the vicinity of the proposed site. The Hawaiian hoary bat roosts in both exotic and native woody vegetation and, while foraging, will leave young unattended in “nursery” trees and shrubs when they forage. If trees or shrubs suitable for bat roosting are cleared during the breeding season, there is a risk that young bats could inadvertently be harmed or killed. To minimize impacts to the endangered Hawaiian hoary bat, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15). Site clearing should be timed to avoid disturbance to Hawaiian hoary bats in the project area.
5	Page 3-16, line 23	The draft EA states “If construction activity is planned to occur within the Petition Area during the Nēnē nesting season, which typically runs from October through March on Kaua‘i, the Petition Area should be surveyed by a qualified biologist prior to the start of construction, to determine if any active Nēnē nesting activity is occurring on the site. If such nesting does occur during construction, it is recommended that a Nēnē monitor be on site during such activity to ensure that no harm occurs to the birds.” Due to its range and foraging behavior, the endangered Hawaiian goose may be present in the vicinity of the proposed action at any time of year. If possible, construction should be timed to avoid the Hawaiian goose breeding season (October through March). A Hawaiian goose monitor may not be sufficient to avoid adverse impacts to nesting geese. We recommend working with our office and DOFAW to address potential impacts to nesting or foraging geese.
6	Page 3-16 to 3-17, line 38; Page 7-7, line 8	The draft EA states “The principal potential impact that the proposed project improvements pose to Hawaiian hoary bats is during the clearing and grubbing phases of the project. Areas of dense vegetation are likely used to some degree by roosting bats. The principal threat that clearing potential roosting habitat poses to this species is between May and July when female bats may be carrying pups and potentially may not be able to flee vegetation clearing

		activities quickly enough to avoid harm. Following build-out of the project, lighting associated with the school facilities, and landscaping vegetation will likely attract volant insects to the site, which in turn will provide bats with additional foraging opportunities. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation along the periphery of the Petition Area should not occur between May 15 and July 15, when bats may be carrying young and potentially could be at risk by such clearing activities.” See our comment above regarding minimizing project impacts to Hawaiian hoary bats. All areas with trees and vegetation above 15 feet should be avoided during the bat breeding season, not just “dense” vegetation.
7	Page 4-9, line 13; Page 7-2, line 31; Page 7-6, line 24	The draft EA states “The principal potential impact that the proposed project improvements poses to Hawaiian Petrels, Newell’s Shearwaters, and Band-rumped Storm Petrels is the increased threat that birds will be downed after becoming disoriented by outdoor lighting associated with possible nighttime construction activity, and following build-out with exterior lighting associated with the structures and appurtenances that are built within the Petition Area. Should nighttime work be required in conjunction with the project construction, and during operation of the proposed project, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally-flying Hawaiian Petrels, Newell’s Shearwaters, and Band-rumped Storm Petrels with external lights and man-made structures.” Construction activities should only occur during daylight hours. Any increase in the use of nighttime lighting, particularly during peak fallout period (September 15 through December 15), could result in additional seabird injury or mortality. Again, we recommend working with our office and DOFAW to address downed seabirds associated with your project.
8	Page 4-9, line 22; Page 7-3, line 1; Page 7-6, line 33	The draft EA states “The principal potential impacts that the proposed project improvements pose to Nēnē are during construction, and following build-out with the increased student enrollment and associated school activities. If construction activity is planned to occur within the Petition Area during the Nēnē nesting season, which typically runs from October through March on Kaua’i, the Petition Area should be surveyed by a qualified biologist prior to the start of construction, to determine if any active Nēnē nesting activity is occurring on the site. If such nesting does occur during construction, it is recommended that a Nēnē monitor be on site during such activity to ensure that no harm occurs to the birds.” If possible, construction should be timed to avoid the Hawaiian goose breeding season (October through March). If a Hawaiian geese nests, forages or loafs in the project area and interactions with humans may result, then the potential for harm or harassment pursuant to the ESA must be addressed.
9	Page 4-9, line 30; Page 7-3, line 9; Page 7-6 to 7-7, line 41	The draft EA states “Due to the likelihood that the endangered Nēnē will utilize resources within the Petition Area, and the Hawaiian Petrels, Newell’s Shearwaters, and Band-rumped Storm Petrels could potentially fall onto the Petition Area during the construction phase of the project, it is recommended that an endangered species awareness program be developed to include general information on the endangered species act and protected species; specific restrictions that will be in force on the job site to protect endangered species; and protocol on who, and how job site personnel will respond to any downed or injured endangered species that may occur on the site. All construction

		personnel should be required to be familiar with the program, and its guidelines, restrictions and protocols to be followed.” This is a good suggestion and we recommend you work with us and DOFAW regarding implementation of this program.
10	Page 4-9 to 4-10, line 39; Page 7-3, line 18	The draft EA states “The principal potential impact that the proposed project improvements pose to Hawaiian hoary bats is during the clearing and grubbing phases of the project. Areas of dense vegetation are likely used to some degree by roosting bats. To avoid potential impacts to the Hawaiian hoary bat, the clearing of dense vegetation along the periphery of the Petition Area should not occur between May 15 and July 15, when bats may be carrying young and potentially could be at risk by such clearing activities.” To minimize impacts to the endangered Hawaiian hoary bat, all woody plants (included in the project area) greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15). Site clearing should be timed to avoid all disturbance to Hawaiian hoary bats in the project area. Please see comment number 6 above.
11	Page 7-1, line 24	The draft EA states “No listed, candidate, or proposed threatened or endangered botanical and fauna species under either the Federal or State of Hawai’i endangered species statutes will be disturbed as a result of the proposed project.” This conclusion is not supported by the information included in your draft EA as endangered fauna have been identified onsite. This should be rectified in the final EA.
12	Page 7-6, line 21	The draft EA states “No listed, candidate, or proposed threatened or endangered avian or mammalian species under either the Federal or State endangered species statutes will be disturbed or adversely impacted as a result of the proposed project.” See comment number 11.



8110-03
January 25, 2013

Dr. Loyal Mehrhoff, Field Supervisor
Fish & Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawai'i 96850

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihū'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Dr. Mehrhoff:

Thank you for your letter dated December 26, 2012 (2013-TA-0052). The proposed project is not utilizing federal money and lands nor does the project require federal approvals or permits. We offer the following in response to your comments:

1. As stated on page 3-16 of the subject Draft EA, should nighttime work be required in conjunction with the project construction, and during operation of the facility, all exterior lighting will be shielded to reduce the potential for interactions of nocturnally flying Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm-Petrels with external lights and man-made structures. The mitigation measures described in Section 3.6 Fauna and the Biological Survey prepared for the project (Appendix A) will be implemented to minimize and/or prevent any impacts to Hawaiian Petrels, Newell's Shearwaters, and Band-rumped Storm-Petrels.
2. The Final EA will add the Hawaiian Stilt and Hawaiian Duck as species that may also be present in the vicinity of the project site, though not recorded during our biological surveys.
3. See response no. 1.
4. As stated on page 3-16, clearing of dense vegetation along the periphery of the project site should not occur between June 1 – September 15, when bats may be carrying young and potentially could be at risk as a result of such clearing activities. We will include that woody plants beyond 15 feet should also not be cleared during this period.
5. Prior to construction, a qualified biologist will survey the area to determine if any active Nēnē nesting activity is occurring on the project site.
6. See response no. 4.
7. See response no. 1.
8. See response no. 5.
9. We acknowledge that you concur with the preparation of an endangered species awareness program for the project.
10. See response no. 4.



8110-03
Letter to Dr. Loyal Mehrhoff
January 25, 2013
Page 2 of 2

11. & 12. The recommended mitigation measures discussed in Sections 3.5 and 3.6 will be implemented to minimize or prevent any impacts to protected botanical and faunal species.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

KATHRYN S. MATAYOSHI
SUPERINTENDENT

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

November 28, 2012

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

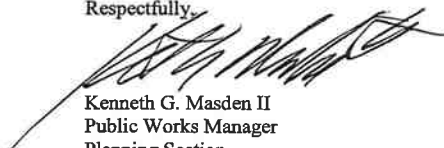
Dear Mr. Matsukawa:

Subject: Draft Environmental Assessment Island School Updated Master Plan
Lihue, Kaua'i, TMK: 3-8-002: 016

The Department of Education has reviewed the Draft Environmental Assessment (DEA) for the Island School Updated Master Plan. We have no comment or concern with the proposed project.

Thank you for this opportunity to review the project plans. If you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Respectfully,


Kenneth G. Masden II
Public Works Manager
Planning Section

KGM:jmb

c: Kathryn Matayoshi, Superintendent
Raymond L'Heureux, Assistant Superintendent, OSFSS
Duane Kashiwai, Public Works Administrator, FDB
William Arakaki, CAS, Kauai Complex Area
Leanora Kaiaokamalie, County of Kauai, Planning Department



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
January 25, 2013

Mr. Kenneth G. Masden, II, Public Works Manager
State of Hawai'i
Department of Education
Planning Section
P.O. Box 2360
Honolulu, Hawai'i 96804

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Masden:

Thank you for your letter dated November 28, 2012, indicating that your Department has no comment or concern with the proposed project.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,


Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 118, HONOLULU, HAWAII 96810-0119

DEC - 5 2012

Dean H. Seki
Comptroller
Marta E. Zheleznaki
Deputy Comptroller



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
January 25, 2013

Mr. Dean H. Seki, Comptroller
State of Hawai'i
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawai'i 96810-0119

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Seki:

Thank you for your letter dated December 5, 2012 (Ref: (P)1279.2), indicating that the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and that you have no comments to offer at this time.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

(P)1279.2

RECEIVED
DEC 06 2012
WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Pre-Assessment Consultation Draft Environmental Assessment
Island School, Puhi, Kauai
TMK: (4) 3-8-002: 016

Thank you for the opportunity to provide comments for the subject project. The proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and we have no comments to offer at this time.

If you have any questions, please call me at 586-0400 or have your staff call Ms. Gayle Takasaki of the Public Works Division at 586-0584.

Sincerely,

DEAN H. SEKI
Comptroller

c: Ms. Leanora Kaiakamalie, County of Kauai-Planning Dept.



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
File:

LUD-4 3 8 002 016-ID1142
DEA Island Sch Updated Master Plan

December 6, 2012



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
January 25, 2013

Mr. Marshall Lum, P.E., Acting Chief
State of Hawai'i
Department of Health
Wastewater Branch
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihu'e District, Island of Kauai, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Lum:

Thank you for your letter dated December 6, 2012 (Ref: LUD-4 3 8 002 016-ID1142
DEA Island Sch Updated Master Plan), indicating that your Department has no
objections to the proposed update of Island School's master plan as domestic
wastewater from the campus will be handled by the Puhi Wastewater Treatment Plant.

Your letter, along with this response, will be included in the forthcoming Final EA. We
appreciate your time and effort in reviewing the subject EA.

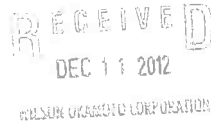
Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza Suite 400
Honolulu, Hawaii 96826



Dear Mr. Matsukawa:

Subject: Draft Environmental Assessment
Island School Updated Master Plan
3-1875 Kaunualii Highway, Lihue, Kauai, Hawaii
TMK (4) 3-8-002: 016

Thank you for the opportunity to comment on the Draft Environmental Assessment for the Island
School Updated Master Plan.

We have no objections to the proposed update of Island School's master plan as domestic
wastewater from the campus updates will be handled by the Lihue-Puhi Wastewater Treatment
Plant.

Should you have any questions, please contact the Planning & Design Section of our branch at
phone 586-4294 or fax to 586-4300.

Sincerely,

MARSHALL LUM, P.E., ACTING CHIEF
Wastewater Branch

LM:mt

c: DOH-Environmental Planning Office, Ms. Laura McIntyre
DOH-WWB's Kauai Staff, Ms. Lori Vetter



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 20, 2012

Wilson Okamoto Corporation
Attention: Mr. Earl Matsukawa, AICP
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

via email: ematsukawa@wilsonokamoto.com

Dear Mr. Matsukawa,

SUBJECT: Draft Environmental Assessment (EA), Island School Updated Master Plan, TMK (4) 3-8-002: 016

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from (1) Land Division - Kauai District; and (2) Engineering Division, on the subject matter. No other comments were received as of our suspense date. Should you have any questions, please feel free to call Supervising Land Agent Steve Molmen at 587-0439. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)

c: County of Kauai Planning Department
Attn: Ms. Leanora Kaiakamalie
Via email to: lkaiakamalie@kauai.gov



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 21, 2012

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division - Kauai District
- Historic Preservation

PERKOLDROW
NOV 28 12

4:12:55 PM

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Assessment, Island School Updated Master Plan

LOCATION:

Puhi, Lihue District, Island of Kauai, TMK (4) 3-8-002:016

APPLICANT:

Wilson Okamoto Corporation for Island School, Petitioner

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document. Please submit any comments by December 19, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name:

Date:

M. H. Saito
11/26/12

cc: Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 641
HONOLULU, HAWAII 96809

November 21, 2012

MEMORANDUM

TO: DLNR Agencies:
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division - Kauai District
 Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Draft Environmental Assessment, Island School Updated Master Plan

LOCATION: Puhi, Lihu'e District, Island of Kauai, TMK (4) 3-8-002:016

APPLICANT: Wilson Okamoto Corporation for Island School, Petitioner

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document. Please submit any comments by December 19, 2012.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: [Signature]
Print Name: Carty S. Chang, Chief Engineer
Date: 11/26/12

cc: Central Files

RECEIVED
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

2012 NOV 27 P 2:50

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/SteveMolmen
REF.:DEAIslandSchoolMP
Kauai.126

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone X. The National Flood Insurance Program does not have any regulations for developments within Zone X.
- () Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone _____.
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is _____.
- () Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- () Mr. Mario Siu Li at (808) 768-8098 or Ms. Ardis Shaw-Kim at (808) 768-8296 of the City and County of Honolulu, Department of Planning and Permitting.
- () Mr. Frank DeMarco at (808) 961-8042 of the County of Hawaii, Department of Public Works.
- () Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
- () Ms. Wynne Ushigome at (808) 241-4890 of the County of Kauai, Department of Public Works.

- () The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update

() Additional Comments: _____

() Other: _____

Should you have any questions, please call Ms. Suzie S. Agraan of the Planning Branch at 587-0258.

Signed: [Signature]
CARTY S. CHANG, CHIEF ENGINEER
Date: 11/26/12



8110-03
January 25, 2013

Mr. Russell Y. Tsuji, Land Administrator
State of Hawai'i
Department of Land and Natural Resources
Land Division
P.O. Box 621
Honolulu, Hawai'i 96809

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Līhu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Tsuji:

Thank you for your letter dated December 20, 2012 regarding the subject Draft EA in which the Land Division - Kaua'i District indicated they have no objections to the project, and the Engineering Division confirmed that the project site is located in Zone X according to the Flood Insurance Rate Map (FIRM), and that the National Flood Insurance Program does not have any regulations for developments within Zone X.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

December 26, 2012

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
STP 8.1069

EM



1907 South Beretania Street
Artisian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
January 25, 2013

Mr. Glenn M. Okimoto, Ph.D., Director
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, Hawai'i 96813-5097

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Dr. Okimoto:

Thank you for your letter dated December 26, 2012 (STP 8.1069), indicating that your Department does not anticipate any significant adverse impacts to the State transportation facilities.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Island School
Draft Environmental Assessment
TMK: (4) 3-8-002:016

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project. DOT understands the applicant proposes to update the school's master plan.

Given the Kaumualii Highway Widening project, fronting the subject project access is currently in place; DOT does not anticipate any significant adverse impacts to the State transportation facilities.

DOT appreciates the opportunity to provide comments. If there are any other questions, please contact Mr. Garrett Smith of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Very truly yours,

GLENN M. OKIMOTO, Ph.D.
Director of Transportation

Bernard P. Carvalho, Jr.
Mayor



Gary K. Heu
Managing Director

DEPARTMENT OF PUBLIC WORKS
County of Kaua'i, State of Hawai'i
4444 Rice Street, Suite 275, Lihu'e, Hawai'i 96766
TEL (808) 241-4992 FAX (808) 241-6604

Larry Dill, P.E.
County Engineer

Lyle Tabata
Deputy County Engineer

December 19, 2012

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826
Attention: Mr. Earl Matsukawa, AICP

Via email only to HPR@wilsonokamoto.com

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (DEA) COMMENTS, ISLAND SCHOOL UPDATED MASTER PLAN (TMK 3-8-002:016)

Dear Mr. Matsukawa:

The County of Kaua'i, Department of Public Works, Division of Wastewater Management (Division) has reviewed your request for consultation on a Draft Environmental Assessment (DEA) for the subject project. The proposed project is not within a County sewer service area, and consequently the Division has no comments on the proposed project.

With respect to wastewater management for the project, the applicant shall comply with all requirements of the State of Hawai'i, Department of Health and if applicable, the private wastewater utility serving the project.

We appreciate the request for pre-consultation on this proposed project. If you have any questions, please call, at (808) 241-4084.

Very truly yours,

EDWARD TSCHUPP
Chief, Wastewater Management Division

cc: Planning Department



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8110-03
January 25, 2013

Mr. Edward Tschupp, Chief
County of Kaua'i
Department of Public Works
Wastewater Management Division
4444 Rice Street, Suite 275
Lihu'e, Hawai'i 96766

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Tschupp:

Thank you for your letter dated December 19, 2012 indicating that the proposed project is not in a County sewer service area and, consequently, your Division has no comments on the project.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,


Earl Matsukawa, AICP
Project Manager


EM/fy


cc: Mr. David Pratt, Island School



MEMORANDUM

TO: LEANORA KAIAOKAMALIE, PLANNING DEPARTMENT

FROM: LARRY DILL, COUNTY ENGINEER 

VIA: TROY TANIGAWA, ESME 

SUBJECT: COMMENTS ON DRAFT EA ISLAND SCHOOL MASTER PLAN

DATE: 12/23/12

This memo is to inform you of the Department of Public Works' (DPW) receipt and review of the Draft Environmental Assessment (EA) for the Island School Updated Master Plan submitted by Wilson Okamoto Corporation.

The Draft EA contains a general description of solid waste disposal and impacts and mitigation measures that is acceptable for the purposes of the document. However, during zoning permitting, the DPW will request more detail on managing and tracking waste diversion efforts during the construction and operations phases of the project. Specific recommendations for developing a Demolition Debris Diversion and Operations Phase Recycling Plan, and for compliance with existing and planned ordinances for commercial waste diversion are provided in our September 4, 2012 correspondence to Wilson Okamoto Corporation.

We look forward to providing input in on this project in the future. Should you have any questions, please contact Allison Fraley at x4837.



1907 South Berelenia Street
 Artesian Plaza, Suite 400
 Honolulu, Hawaii, 96826 USA
 Phone: 808-946-2277
 FAX: 808-946-2253
 www.wilsonokamoto.com

8110-03
 January 25, 2013

Mr. Larry Dill, P.E., County Engineer
 County of Kaua'i
 Department of Public Works
 4444 Rice Street, Suite 275
 Lihu'e, Hawai'i 96766

Attention: Mr. Troy Tanigawa, P.E., Environmental Services Management Engineer

Subject: Draft Environmental Assessment (EA)
 Island School Updated Master Plan
 Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
 Tax Map Key: (4) 3-8-002: 016

Dear Mr. Dill:

This is in response to your memorandum dated December 23, 2012 to Ms. Leanora Kaiaokamalie of the County of Kaua'i Planning Department regarding the subject Draft EA.

We appreciate your acknowledgement that the general description of solid waste disposal and associated impacts and mitigation measures of Island School, as discussed in the Draft EA, is acceptable for purposes of the document. During the subsequent zoning permit phase, we will provide further detail on managing and tracking waste diversion efforts during the construction and operation phases of the project. This would include a Demolition Debris Diversion and Operations Phase Recycling Plan, and compliance with applicable ordinances for commercial waste diversion as recommended in your Department's letter dated September 4, 2012 for the subject project.

Your memorandum, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,



Earl Matsukawa, AICP
 Project Manager

EM/fy

cc: Mr. David Pratt, Island School



Water has no substitute.....Conserve it

EM

JAN 11 2013

January 8, 2013

Mr. Earl Matsukawa
Wilson Okamoto Corp.
1907 South Beretania Street, Suite 400
Honolulu, HI 96826

Dear Mr. Matsukawa:

Subject: Draft Environmental Assessment (EA), Island School Updated Master Plan,
TMK: 3-8-02:016, Puhi, Kauai

This is in regard to your letter dated November 19, 2012. We have no objections to the proposed Draft Environmental Assessment. The following are our comments to the subject Draft Environmental Assessment for Island School Updated Master Plan.

Any actual subdivision or development of this area will be dependent on the adequacy of the source, storage, and transmission facilities existing at that time. At the present time, the existing source facilities are operating at capacity.

Prior to the Department of Water (DOW) recommending building permit or water service approval, the applicant will be required to:

1. Submit a formal request for water service for our review and approval. Include detailed water demand (both domestic and irrigation) calculations along with the proposed water meter size. Water demand calculations submitted by your engineer or architect should also include fixture count and water meter sizing worksheets. The Department's comments may change depending on the approved water demand calculations.
2. Prepare and receive DOW's approval of construction drawings for the necessary water system facilities and construct said facilities. These facilities may include but not be limited to:
 - a) Additional source facilities, if applicable.
 - b) The domestic and fire service connections, if applicable.
 - c) The appropriate backflow prevention device, if applicable.
3. FRC offsets may apply for source, storage, and transmission facilities that qualify for offsets, in accordance with the DOW Rules and Regulations.
4. Receive a "Certification of Completion" notice for the construction of necessary water system facilities from the DOW.

Mr. Earl Matsukawa
Wilson Okamoto Corp.
Subject: Draft Environmental Assessment (EA), Island School Updated Master Plan,
TMK: 3-8-02:016, Puhi, Kauai
January 8, 2013
Page 2

If you have any questions concerning the construction drawings, please contact Mr. Keith Aoki at (808) 245-5411. If you have any questions concerning the Certificate of Completion, please contact Mr. Dustin Moises at (808) 245-5459. For other questions, please contact Mr. Edward Doi at (808) 245-5417.

Sincerely,

Gregg Fujikawa
Chief of Water Resources and Planning Division

ED:lao
T-14379 Puhi, Draft EA for Island School Updated Master Plan- Nov 2012



8110-03
January 25, 2013

Mr. Gregg Fujikawa, Chief
Water Resources Planning Division
Department of Water
County of Kaua'i
4398 Pua Loke Street
P.O. Box 1706
Lihu'e, Hawai'i 96766

Subject: Draft Environmental Assessment (EA)
Island School Updated Master Plan
Puhi, Lihu'e District, Island of Kaua'i, Hawai'i
Tax Map Key: (4) 3-8-002: 016

Dear Mr. Fujikawa:

Thank you for your letter dated January 8, 2013. We appreciate your statement that you have no objections to the proposed project and acknowledge that water service for any additional development at Island School will depend on the adequacy of source, storage and transmission facilities available at that time. With regard to your numbered comments, we offer the following responses in their respective order:

1. A formal request for water service will be made to your department as the various master-planned projects proceed. The request will include the supporting information specified in your comment.
2. Construction drawings for the necessary water system facilities, as specified in your comment, will be submitted for DOW's approval.
3. We acknowledge that Facility Reserve Charge (FRC) offsets may apply to Island School in accordance with the DOW Rules and Regulations.
4. We acknowledge the need for a "Certification of Completion" notice from the DOW for the construction of necessary water system facilities.

Your letter, along with this response, will be included in the forthcoming Final EA. We appreciate your time and effort in reviewing the subject EA.

Sincerely,

Earl Matsukawa, AICP
Project Manager

EM/fy

cc: Mr. David Pratt, Island School