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Environmental and Community Planning

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September 9, 2013

Ms. Esther Imamura
Planning Department
County of Hawai'i
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720

PLANNING DEPARTMENT
COUNTY OF HAWAII
2013 SEP 11 PM 2:32

Re: KE`EI BEACH – MAINTENANCE AND REPAIR OF EXISTING JEEP ROAD

Aloha Ms. Imamura:

We are writing to you on behalf of our client, KAMEHAMEHA SCHOOLS, LAND ASSETS DIVISION - HAWAII ISLAND (KS LAD). KS LAD has asked us to ascertain the need for state and/or county permits for proposed maintenance and repair work for an existing Jeep/Utility Road (Jeep Road) located at Ke`ei Beach, South Kona District, Hawai'i County.

Project Description (See attached graphic)

The existing Ke`ei Jeep Road is located entirely within the KS-owned TMK parcel (3) 8-3-04:001. Most of this TMK, including the portion of the parcel in which the Jeep Road is located, is within the GENERAL SUBZONE of the State Conservation District, and is also within the County's SPECIAL MANAGEMENT AREA.

The Jeep Road begins at Pu`uhonua Road and runs in a generally westerly direction toward the ocean for a distance of approximately 700 linear feet until it intersects with the existing Ke`ei Beach Road. A section of the Jeep road continues to the south, runs behind Ke`ei Village and intersects with a private road leading to Hālau Maluhia. The Jeep Road is an unpaved, gravel roadway that is typically 20 feet in width.

KS LAD is proposing to perform maintenance and repair work on the 700 foot section of the Jeep Road extending from Pu`uhonua Road to Ke`ei Beach Road. The Jeep Road is used by the public as an alternate vehicular access to Ke`ei Village (currently allowed by Kamehameha Schools). In addition, the Jeep Road also serves as a utility corridor for potable water infrastructure for Ke`ei Village and Hālau Maluhia (CDUP HA-3647, Hawai'i County SMA Permit.)

The proposed maintenance and repair work will consist of the spreading of gravel material, grading, and realignment of the mauka and makai ends of the road. KS is first proposing to level-off the road surface to better accommodate vehicular traffic. This will

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be accomplished by filling-in low spots, grading high areas, and compacting the entire length of the Jeep Road to create a smoother, more weather resistant road surface.

Next, KS is proposing to straighten out the width of the road corridor to 20 feet to better accommodate 2-way traffic. The road corridor snakes along its entire length and in some areas narrows, constricting traffic. KS would like to straighten the roadway edges so the roadway corridor is a consistent 20 feet throughout.

Third, on the mauka end of the Jeep Road, KS is proposing to realign the first 170 linear feet approximately 15 feet to the south of its current alignment. This realignment is proposed in order to provide a buffer space of at least 15 feet between the northern edge of the Jeep Road and an historical trail and wall, which has been designated as SHPD Site 6022. The rest of the alignment will also maintain this 15 buffer.

Finally, KS is proposing to realign the final 100 feet at the makai end of the Jeep Road. The realignment at the makai end is needed to bypass the waterline that rests above grade in this area. Currently, the waterline is exposed to being driven over by vehicular traffic at the bend on the makai end of the Jeep Road. This situation is due to the 8-inch waterline not being able to bend at acute angles, which causes it to take up much of the existing Jeep Road as it transitions to the Utility Road (as illustrated in the attached graphic).

All areas proposed for realignment have been previously disturbed and an archeological study has been prepared for the proposed action.

In addition, the proposed action will require the relocation and burying of the existing 8-inch waterline running along the Jeep Road. KS anticipates the need to also trench and rebury the 8-inch waterline as it crosses the Jeep Road at the intersection of Pu'uhonua Road and the Jeep Road.

The Office of Conservation and Coastal Lands via CDUP 3647 for the new water line found that:

1. *"The waterline use along the Jeep Road was an identified land use in the General Subzone of the Conservation District and was a moderate alteration of existing structures and facilities, pursuant to 13-5-22, Hawaii Administrative Rules (HAR) P-8 STRUCTURES AND LAND USES EXISTING*
2. *Pursuant to 13-5-40 of the HAR, a public hearing was not required*
3. *In conformance with Chapter 343, Hawaii Revised Statutes and HAR, Title 11, Department of Health, Chapter 200, Environmental Impact Statement Rules, Subchapter 8, 11-200-8(a)(3) construction and location of single, new, small facilities or structures and the alteration and modification of the same and the*

alteration and installation of new, small equipment and facilities and the alteration and modification of same, including, but not limited to D) Water, sewage, electrical, gas, telephone, and other essential public utility services extensions to serve such structures or facilities: and (4) Minor alterations in the conditions of land, water, or vegetation, the proposed use is exempt."

HAR Title 13, Subtitle 1, Chapter 5 – Conservation District, 13-5-2 Definitions

We sent a letter dated July 26, 2013 to Samuel J. Lemmo, Administrator of the DLNR Office of Conservation and Coastal Lands (OCCL). In that letter, we stated that it is our understanding that the following definitions contained in the current CONSERVATION DISTRICT "General Provisions" would apply to the proposed maintenance and repair work for the Ke`ei Jeep Road:

"Minor alteration" means work done to an existing structure, facility, or use that results in a ten percent or less increase in the size of the structure, facility, or use."

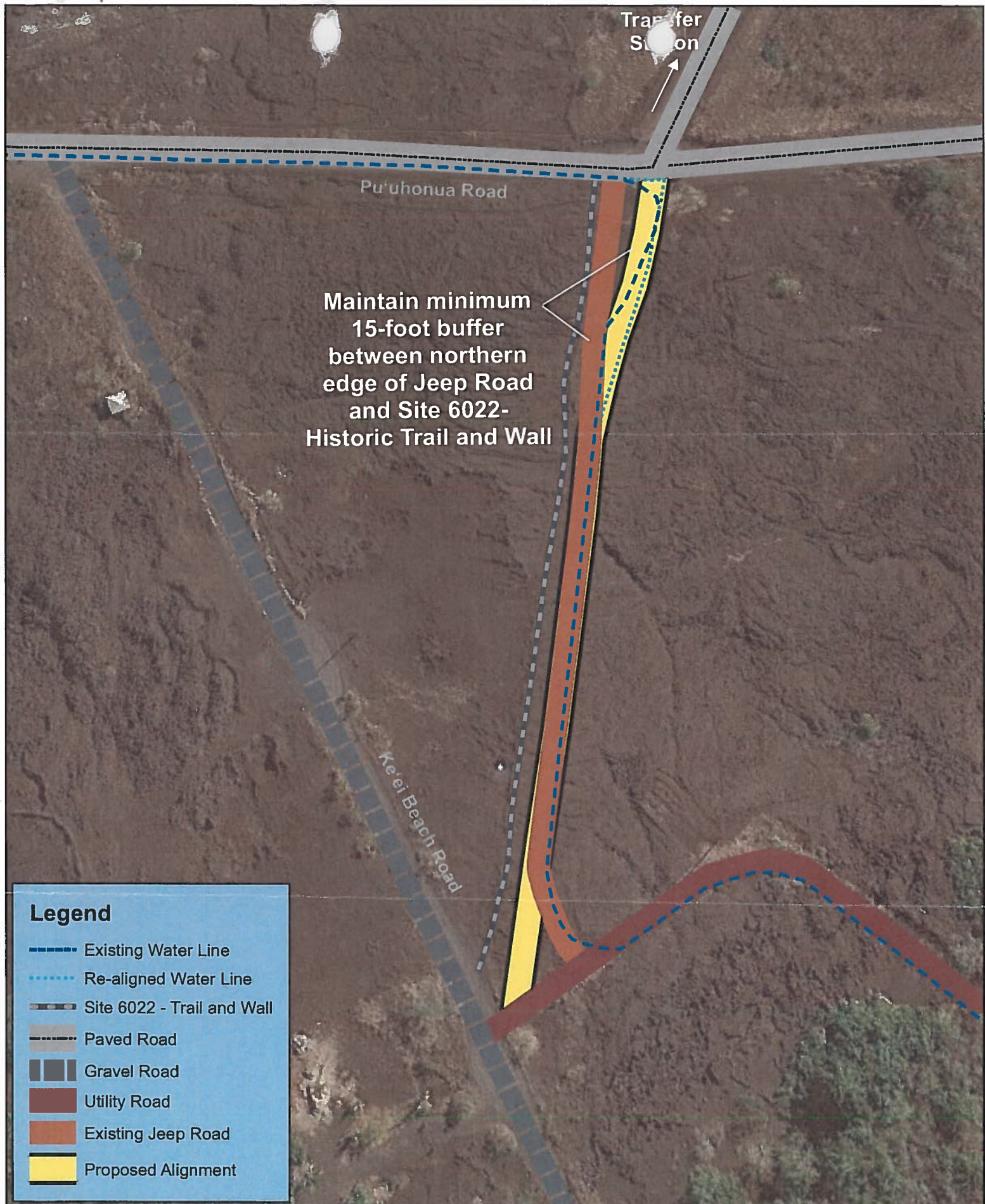
"Minor repair" means routine work done to an existing structure, facility, use, land, and equipment, replacement of component parts, and that results in negligible change to or impact to land, or a natural and cultural resource."

The OCCL letter of response, signed by Mr. Lemmo and dated August 5, 2013, concluded that: *"As noted by you, the subject area does lie within the General subzone of the Conservation District and the area has been reviewed under Conservation District Use Permit (CDUP) HA-3647 for Waterline Improvements. The roadway improvements may be considered as minor alterations. By complying with the attached conditions of CDUP HA-3647 that has been issued for improvements along this road way, the OCCL has no objections to the proposed work."*

Given the project description provided in this letter, and the determination by OCCL that no further DLNR permits are required for these minor roadway alterations, we respectfully request your concurrence that the proposed Ke`ei Jeep Road maintenance and repair work can be carried out under an amendment to the existing County SMA Permit for the recently installed water line.

Sincerely yours,


Bruce Tsuchida
Principal Planner



Maintenance and Repair of
Existing Jeep Road at TMK 8-3-04:001

For: Kamehameha Schools By: Townscape, Inc.