

**ENVIRONMENTAL ASSESSMENT  
U.S. DEPARTMENT OF THE INTERIOR  
OFFICE OF HAWAIIAN RELATIONS**

**PROPOSED MAILI LAND EXCHANGE BETWEEN  
THE DEPARTMENT OF HAWAIIAN HOME LANDS AND THE STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

**1.0 Introduction**

This Environmental Assessment (EA) specifically considers the exchange of property between the Department of Hawaiian Home Lands (DHHL) and the State of Hawaii Department of Land and Natural Resources (DLNR). This transaction requires approval by the Secretary of the Interior. Federal oversight of DHHL land transactions began in 1921 when Congress passed the Hawaiian Homes Commission Act (HHCA), creating the Hawaiian Homes Commission and designating approximately 200,000 acres as “available lands” to rehabilitate the indigenous Hawaiian population by providing native Hawaiians with access to farm and homestead land. Under section 204(3) of the HHCA, ch. 42, 42 Stat. 110 (1921), all available lands were to become Hawaiian home lands under control of the Commission, provided that “such lands should assume the status of the Hawaiian home lands until the Commission, with the approval of the Secretary of the Interior, makes the selection and gives notice thereof to the Commissioner of Public Lands.” 42 Stat. 110 (1921).

Thirty-three years later, Congress passed U.S. Public Law 82-481, on June 18, 1954, which amended the HHCA, adding new subsection 204(4) “to permit the [Commission] to exchange available lands as designated by the Act, for public land of equal value.” The H.R. Rep. No. 1517, 83d Congress 2d Sess. (1954); S. Rep. No. 1486, 83d Congress 2d Sess. 2 (1954). Section 204(4), provided that “the Commission may with the approval of the Governor (Governor approval no longer required) and the Secretary of the Interior, in purposes of this Act, exchange title to available lands for land publicly owned, of equal value.” 68 Stat. 262 (1954). Hence, it was clear Congress intended the Commission would not have the authority to consummate any land exchange without secretarial approval.

After Hawaii was admitted to the Union in 1959, the responsibility for the administration of the Hawaiian home lands was transferred to the State of Hawaii. Section 4 of the Hawaiian Admission Act, Public Law No. 86-3, 73 Stat. 5 (1959), 48 U.S.C. nt. Prec. § 491 (1982) provides: “[a]s a compact with the United States relating to the management and disposition of the Hawaiian Home lands, the Hawaiian Homes Commission Act, 1920, as amended, shall be adopted as a provision of the Constitution of such State.” Thus, secretarial approval remained necessary before the Commission was empowered to conduct land exchanges.

In 1995, Congress again iterated its intent to have the Secretary provide oversight of land exchanges occurring under the auspices of the HHCA. The Hawaiian Home Lands Recovery Act of 1995 (HHLRA), Public Law 104-42, 109 Stat. 357, gave oversight responsibilities to the Secretary to ensure that real property under the HHCA is, among other things, administered in a manner which best serves the interests of the beneficiaries.

Section 204(3) of the HHCA makes clear that a land exchange is not valid until it has been approved by the Secretary (or his designee). In considering a land exchange, the Secretary is required at a minimum to determine that the exchange would further either of the purposes set forth in section 204(3) (i.e., that the exchange would consolidate Homes Commission holdings, or that it would help to “better effectuate” the purposes of the Homes Commission Act), and that the lands proposed for exchange are of equal value or the land DHHL is transferring is of lesser value than the land DHHL is receiving. These elements require the exercise of judgment. Because the discharge of the responsibility placed on the Secretary is discretionary and not ministerial, approval of a land exchange is subject to National Environmental Policy Act (NEPA). In general, section 102(2)(C) of NEPA, 42 U.S. C. § 4332(2)(C) provides that a “detailed statement” must be prepared whenever a major Federal action will have a significant impact on the quality of the human environment.

This EA is being prepared to aid in determining whether a “Finding of No Significant Impact” is appropriate or whether the subject land exchange requires preparation of an Environmental Impact Statement (EIS) under of 1969, 42 U.S.C. 4321 et seq. If the Department of the Interior’s review of the proposed land exchange constitutes a major Federal action significantly affecting the human environment, NEPA requires the Department to prepare a detailed EIS so it may fully consider those impacts.

### **1.1 Purpose and Need for the Proposed Action**

The purpose of the proposed action is to comply with U.S. Public Law 101-132, 103 Stat. 783 (November 3, 1989), and U.S. Public Law 104-52, 109 Stat. 468 (November 19, 1995), combat homelessness on the Waianae coast, and provide abused children with a place in which they are safe from physical and emotional assault.

Recognition of the need for a transitional facility and abused children center began on July 6, 2006, when Hawaii’s Governor Linda Lingle signed an emergency declaration allowing for the expedited building of homeless shelters to address the pressing health and safety issues engendered by the homeless population crisis on the parks and beaches of the leeward Coast of Oahu. The State of Hawaii’s Department of Health surveyed the area and found approximately 4,000 people, including women and young children, living in these areas without adequate sanitation facilities. Because Native Hawaiians constituted approximately 80 percent of the homeless persons on the leeward coast, the DHHL became involved in trying to find a solution to the emergency.

The DHHL determined that the best way to serve the indigent Native Hawaiians on the leeward coast, which is severely lacking in homeless transitional facilities, was to bridge the gap between homelessness and affordable homes. To do this they allocated land that U.S. Public Law 101-132, 103 Stat. 783 (November 3, 1989), and U.S. Public Law 104-52, 109 Stat. 468

(November 19, 1995) required to be conveyed by the Administrator of the General Services Administration (GSA) to the State of Hawaii DLNR, with a simultaneous exchange to take place between the State of Hawaii DLNR and DHHL, for the building of the Maili Project.

Based upon the Governor's July 2006 Declaration of a State of Emergency due to the homelessness of Native Hawaiians, GSA issued a license to DHHL in February 2007. This license permitted DHHL to build a homeless transitional shelter on 6.23 acres of the total 89 acres of Maili property that is proposed to be conveyed to DHHL by GSA through the State, while the exchange is being finalized. The Maili shelter, dedicated on December 18, 2008, consists of 80 living units designed primarily for families, an early childhood education center, and a foster child transitional center for abused and needy children. Management of the shelters would remain with the State after the conveyance of the Maili property to DHHL.

No additional alternatives are being considered based upon 43 C.F.R. Part 46, Section 310(b), because there are no unresolved conflicts with respect to the proposed action and the alternative uses of the resources. However, it is worth noting that failure to exchange the Maili property would have negative environmental impacts. This statement is based upon the State of Hawaii's Department of Health 2006 survey of the Waianae Coast of Oahu where they found approximately 4,000 people, including women and young children, were living in compounds without adequate sanitation facilities. Raw sewage from these make-shift compounds was free to make its way into the ocean, rivers and streams of Waianae, Hawaii. A no action alternative would push persons from transitional housing back to homeless compounds and promote the contamination of the watershed.

Failure to exchange the Maili property could also take the property back to the status of an abandoned field in a residential area. Utilization of the Maili property by DHHL has stemmed the vandalism, illegal littering/dumping, and random brush fires that damage the environment. Previous to the utilization of the property, GSA spent thousands of dollars each year protecting and maintaining the area.

## **2.0 Description of the Proposed Action**

The U.S. Public Law 101-132, 103 Stat. 783 (November 3, 1989), and U.S. Public Law 104-52, 109 Stat. 468 (November 19, 1995) requires the Maili property (described below) be conveyed by the Administrator of the GSA to the State of Hawaii. It then goes on to require the State of Hawaii simultaneously transfer the Maili property to the DHHL in exchange for DHHL property separately agreed to by the State of Hawaii and DHHL. The State of Hawaii and DHHL have chosen to exchange 34.222 acres situated at Hoolehua and Palaau, Molokai, Hawaii, currently owned by the DHHL, for the Maili property.

The Maili property located in Waianae, Hawaii, to be transferred to DHHL is described as: Those lands situated at Lualualei, Waianae, Oahu, Hawaii, designated as (1) "Part A," containing

an area of 19.147 acres, SUBJECT, HOWEVER, to Easement M for Roadway purposes containing an area of 4,837 square feet, all more particularly described in a survey description prepared by the Survey Division, Department of Accounting and General Services, State of Hawaii designated C.S.F. No. 23,349, dated September 11, 1990, and Map 53, Land Court Application 130, Land Court, State of Hawaii, dated November 20, 1978, and (2) "Part B," containing an area of 70.127 acres, more particularly described in a survey description and survey map prepared by the Survey Division, Department of Accounting and General Services, State of Hawaii, designated C.S.F. No. 21,350, dated September 11, 1990. See Exhibit A for map of Maili property.

The Molokai High and Intermediate School site property located in Hoolehua, Hawaii, to be transferred to DHHL is described as:

Those certain lands situate at Hoolehua and Palaau, Molokai, Hawaii, designated as (1) "Molokai High and Intermediate School," containing an area of 22.420 acres, SUBJECT, HOWEVER, to portions of Easement 1 for Electrical Purposes (10.00 feet wide) in favor of Molokai Electric Co., Ltd., all more particularly described in a survey description and survey map prepared by the Survey Division, Department of Accounting and General Services, State of Hawaii, designated C.S.F. 24,293, dated July 6, 2006, and (2) "Lot 57-A-1," containing an area of 11.802 acres, SUBJECT, HOWEVER, TO A NON-EXCLUSIVE Drainage Easement containing an area of 3,873 square feet, all more particularly described in a survey description and survey map prepared by the Survey Division, Department of Accounting and General Services, State of Hawaii, designated C.S.F. No. H.H. Molokai Folder C, dated April 7, 2003, and H.H. Molokai Folder C, dated April 2, 2003. See Exhibit B for maps of the Molokai High and Intermediate School property.

The proposed land exchange will not change the use of either the Maili property or the Molokai High and Intermediate School site. Specifically, a portion of the Maili property will continue to be used, for the next 10-years, as a transitional housing project for the Leeward Coast, which includes a large contingent of Native Hawaiian families. The Project includes five, two-story transitional housing buildings with 16 units each for a total of 80 units that can accommodate up to 300 people. It also includes a community learning center building with administrative offices, adult classrooms, a kitchen, dining/multi-purpose room, and a children's center with classrooms.

Along with the transitional housing there is a receiving home named Hoomalu O Na Kamalii for children temporarily removed from abusive environments. The actual buildings are located on a 6.23-acre portion of the 89-acre former Voice of America property in Maili. The \$14.8 million project includes more than \$11 million in State funds, a donation of more than \$2.5 million from Kamehameha Schools for the community learning center, and a donation of more than \$1.1 million from the Wood Family for the receiving home. The facility is under a 20-year license agreement with the State.

In regards to the Molokai High and Middle School site, GSA's deed conveying fee simple title, for the 89.274 acres at Maili to the State will contain a reverter condition pertaining to the Molokai High and Middle School property property's use. The condition will provide for the reversion of all or any portion of the Molokai High and Middle School property, for non-compliance with the deed's stated educational and recreational uses. As evidenced by the reversionary clause, there are no current plans to change the use of the Molokai High and Middle School lands.

### **3.0 Description of the Environment**

#### **3.1 Maili Property**

##### *Historical Background*

The property consists of approximately 89 acres on Oahu, Hawaii. The site was previously used as a Voice of American radio transmitter site. In 1971, the site was transferred to the United States Coast Guard (USCG). The USCG reported the property excess to GSA in 1977. The GSA attempted to sell the property in the early 1980s; however, those efforts were stalled because of lengthy litigation.

After the litigation ended, Congress adopted legislation regarding the means and method of conveyance. In particular, Public Law 101-136, as amended by Public Law 104-52 (section 9) requires that the GSA Administrator convey approximately 89.274 acres of property in Maili, Oahu, Hawaii, (referred to as the "Maili Property") to the State of Hawaii on the condition that the State simultaneously exchange such property and other considerations (if necessary) for an equal total amount of consideration that includes one or more parcels of Hawaiian Home Lands on the islands of Hawaii, Oahu, and Molokai (the Exchange Property). The legislation further requires that the Exchange Property only be used for educational or recreational purposes in perpetuity, and if such property is not so used then the Exchange Property will revert to the United States. To that end and after many years of negotiations, GSA, the State and the DHHL, are ready to consummate the exchange.

At this time, the exchange will not include approximately 5 acres of the Maili Property that requires further action (herein after referred to as the FA Parcel). The FA parcel includes a debris field from a building that the USCG demolished in the late 1980s. The GSA's environmental contractor (MACTEC) advised that this debris includes some PCBs, asbestos and lead based paint. An underground storage tank also was identified, but has subsequently been removed. The debris area is quite small but in order to ensure that the property is fully evaluated and appropriate action taken, GSA's contractor recommended a "stepped out" zone be carved out from the conveyance. In a further abundance of caution, GSA nearly tripled the size of the area when it created the FA Parcel.

The U.S. Coast Guard will further evaluate the FA Parcel and take appropriate action including remediation if warranted. According to GSA, based upon their review of the Maili Property, exclusive of the FA Parcel, the Maili property does not require further examination and may be conveyed.

The USCG has expressed some concern about the Phase I environmental evaluation suggestion that it does not meet their current standards. The property originally was reported excess before the adoption of CERCLA. Thus, studies that would now be conducted at the time of the report of excess were done much later. The GSA has studied the concerns raised by the USCG and consulted with their environmental contractor. The GSA has advised USCG and the Department that they are satisfied with the level of study undertaken, and thus are prepared to proceed with the conveyance. They have further apprised the other parties to this transaction of the concerns raised by USCG.

The Parties to the Exchange Property have agreed that the Maili Deed will include an obligation for an Archeological Inventory Survey prior to any construction or ground disturbance activity. This agreement excludes the FA Parcel as well as the area where the housing was recently constructed. The State Historic Preservation Officer has indicated that this covenant will satisfy that office's concern with the exchange.

The GSA Administrator's conveyance of the approximately 89.274 acres (less the 5 acre FA Parcel) of property in Maili is subject to NEPA review by GSA. The GSA Public Building Service (PBS) NEPA Desk Guide (October 1999) authorizes GSA to rely on a categorical exclusion so long as the supporting checklist does not indicate that any extraordinary circumstances exist that would warrant preparation of an EA or EIS. In this instance, GSA relied upon 5.4(g). This categorical exemption applies to the:

Disposal of real property required by public law wherein Congress has not specifically exempted the action from the requirements of NEPA.

The GSA utilizes this categorical exclusion when conveying property required by a specific public law. Based upon GSA's NEPA review, the conveyance of the Maili property is unlikely to adversely affect of the environment.

#### *Site Description of Maili Property*

Physical Condition - The Maili property is 89.274 acres and zoned as agricultural land. The elevation of the property ranges from 2' to 30' above sea level. The soil type is approximately 60 percent Mamala stony silty clay loam, and 40 percent Mokuleia clay. Both soils consist of shallow, well drained soils along the coastal plans on the island of Oahu and Kauai. These soils formed in alluvium deposited over coral limestone and consolidated calcareous sand. They are nearly level to moderately sloping. Elevations range from nearly sea level to 100 feet on Oahu. The annual rainfall amounts to 15 to 40 inches. These soil types were typically used for sugarcane, truck crops, and pasture.

**Buildings** - On a 6.23-acre western portion of the property there are five, two-story transitional housing buildings with 16 units each for a total of 80 units that can accommodate up to 300 people. It also includes a community learning center building with administrative offices, adult classrooms, a kitchen, dining/multi-purpose room, and a children's center with classrooms. Along with the transitional housing buildings there is a receiving home named Hoomalu O Na Kamalii for children temporarily removed from abusive environments.

**Plants** - The area outside of the building compound is vegetated with Koahaole shrubs, scattered Keawe trees and an understory of Weedy Bufflegrass. **Wildlife** - Wildlife common to the property are: Mongoose, Zebra Dove, Common Myna Bird, Red Vented Bulbul, Spotted Dove, and the Occasional House Sparrow.

### **3.2 Molokai High and Intermediate School Property**

#### *Historical Background*

The property consists of seven parcels that contain 34.222 acres of urban and agriculture state land and use classified land. A portion of this property was the site of the DHHL Molokai District Office and Water System Warehouse from the 1940's through the 1970's. The building was demolished in 1973.

At this time, the exchange will not include .498 acres of the Molokai High and Intermediate School site that requires further action (herein after referred to as the MSW Parcel). During the early 1950's, DHHL replaced portion of the water system piping and approximately 18 pieces of the transite pipes were left on the MSW Parcel located on less than .25 acres in the southwest section of the property behind the current Maui County Fire Station at Hoolehua (See Exhibit C for map of MSW Parcel). When DHHL discovered the abandoned asbestos pipes, they retained the services of Vuich Environmental Consultants, Inc., to remove and dispose of them. The transite pipes, measuring 69 feet in length, were removed on January 6-7, 2009. The work consisted of wrapping the transite pipes in two layers of 6-mil poly-sheeting, applying appropriate markings and transportation labels and completing a special-waste manifest document for asbestos material. The pipes were transported and off-loaded at the Molokai Sanitary Landfill by Vuich personnel on January 7, 2009. This landfill is permitted by the State of Hawaii Department of Health to receive asbestos-containing material. There were minor disturbances to the environment by this action resulting in either minor or no impact to the environment. Vuich Environmental Consultants, Inc., is a licensed contractor, operating under Hawaii requirements for asbestos abatement works. Vuich certified that all works were completed using good customary practice and following regulatory guidelines for this type of project. All contract laborers are trained and certified for the removal of asbestos material and certified for work in hazardous waste operations.

There are still a few pieces of cement and iron pipes left on site. These pipes do not contain asbestos or other hazardous material. The DHHL intends to relocate these pipes to its base yards for future re-use.

As stated previously, the MSW Parcel debris area is less than .25 acres but in order to ensure that the property is fully evaluated and appropriate action taken, DHHL has stated a “stepped out” zone be carved out from the conveyance. In a further abundance of caution, DHHL has nearly doubled the size of the area when it created the MSW Parcel. The DHHL will further evaluate the MSW Parcel and take appropriate action including remediation if warranted. According to DHHL, based upon their review of the Molokai High and Intermediate School site, exclusive of the MSW Parcel, the Molokai High and Intermediate School site do not require further examination and may be conveyed.

#### *Site Description of the Molokai High and Intermediate School Property*

The Molokai High and Intermediate School site is located at Hoolehua-Palaau Homesteads, Hoolehua, Island of Molokai, State of Hawaii. The property consists of seven parcels that contain 34.222 acres of urban and agriculture state land use classified land. See Exhibit B for map of Molokai High and Intermediate School Property.

Physical Condition - The property consists of three property levels beginning near the athletic field (795' elevation); school site (810' elevation); and Lihi Pali Avenue street boundary (830' elevation). The athletic field and school site are divided by Farrington Avenue.

There are two types of soil on the property. Hoolehua soils (75 percent of property), consist of well-drained soils in depressions and in drainage ways on the island of Molokai. Hoolehua silty clay, 0-3 percent slopes soil occurs in depressions. Notwithstanding such depression, the property is also located within a Federal Emergency Management Agency Zone X flood zone area. Lahaina silty clay (25 percent of property), 3-7 percent slopes soil is located on smooth uplands. The subject soil conditions are well suited for a variety of urban land uses.

Buildings - There are eight brick/stone buildings with a total square footage of 94,571.

Plants - Within the building area of the properties there are ornamental trees, shrubs and grasses. The area outside of the building compound is generally vegetated with Koahaole shrubs, scattered Keawe trees, and an understory of Weedy Bufflegrass.

Wildlife - Wildlife common to the property are: Mongoose, Zebra Dove, Common Myna Bird, Red Vented Bulbul, Spotted Dove, and the Occasional House Sparrow.

## **4.0 Environmental Impacts**

### **4.1 Impacts of the Proposed Action**

Based upon documentation sent to the Department by GSA and the DHHL, there is no plan to change the use of either of the properties. Thus, the Maili land exchange:

- Is unlikely to be inconsistent with any applicable Federal, State, Indian tribal or local law,
  - regulation or standard designed to protect the environment;
- Is unlikely to have results that are inconsistent with locally desired social, economic, or other environmental conditions;
- Is unlikely to result in the use, storage release and/or disposal of toxic, hazardous, or radioactive materials, or in the exposure of people to such materials;
- Is unlikely to adversely affect a significant aspect of the natural environment;
- Is unlikely to adversely affect a significant aspect of the socio-cultural environment;
- Is unlikely to generate controversy on environmental grounds;
- Does not have a high level of uncertainty about the exchanges environmental effects;
- Is unlikely to pose a risk to the human environment;
- Is not part of an ongoing pattern of actions that are cumulatively likely to have adverse effects on the human environment;
- Is unlikely to set a precedent for, or represent a decision in principle about, future Department of the Interior actions that could have significant effects on the human environment; and
- Is unlikely to have adverse effect on public health and safety or on any other environmental media or resources that are not specifically identified above.

## **5.0 Conclusion**

No significant environmental consequences are expected because there are no planned changes in the use of the land.

## **6.0 Persons and Agencies Consulted**

The GSA, DHHL and State of Hawaii Office of the Attorney General personnel were consulted in the preparation of this EA. The GSA and DHHL provided information for the preparation of this EA.

## **7.0 Preparer**

This EA was prepared by Mr. Ka'i'ini Kaloi, Director, Office of Hawaiian Relations, U.S. Department of the Interior, 1849 C Street, NW, MS 3543, Washington, DC 20240, at

(202) 513-0712.

carrollcox.com

**FINDING OF NO SIGNIFICANT IMPACT  
U.S. DEPARTMENT OF THE INTERIOR  
OFFICE OF HAWAIIAN RELATIONS**

**MAILI LAND EXCHANGE BETWEEN  
THE DEPARTMENT OF HAWAIIAN HOME LANDS AND THE STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

**A. INTRODUCTION**

The Office of Hawaiian Relations of the United States Department of the Interior intends to review the land exchange between the DHHL and the State of Hawaii.

**B. STATEMENT OF ENVIRONMENTAL SIGNIFICANCE OF THE PROPOSED ACTION**

For the reasons stated below, I have determined that the Proposed Action would not have a significant impact on the quality of the human environment under Section 102(2)(C) of the National Environmental Policy Act of 1969, 42 U.S.C. 4332(2)(C), and therefore an environmental impact statement is not required.

**C. REASONS**

This finding of no significant impact is based on the attached environmental assessment which identifies and discusses the environmental impacts of the Proposed Action and no action alternative. It is not anticipated that the exchange will result in significant adverse environmental impact. The exchange has the potential to have positive impacts on the environment by putting people into homes with adequate sanitation facilities and discouraging dumping on the Maili property.

The Office of Hawaiian Relations finds that the Proposed Action would have no significant impact on the environment.

---

Willie R. Taylor  
Acting, Deputy Assistant Secretary – Policy  
and Program Management

---

Date

**DECISION OF RECORD  
ENVIRONMENTAL ASSESSMENT  
U.S. DEPARTMENT OF THE INTERIOR  
OFFICE OF HAWAIIAN RELATIONS**

**THE MAILI LAND EXCHANGE BETWEEN  
THE DEPARTMENT OF HAWAIIAN HOME LANDS AND THE STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES**

DECISION

It is my decision to review the Maili land exchange between the Department of Hawaiian Home Lands (DHHL) and the State of Hawaii as outlined in the Proposed Action contained in Environmental Assessment.

RATIONALE

The proposed exchange would implement the statutory requirements of U.S. Public Law 101-132, 103 Stat. 783 (November 3, 1989), and U.S. Public Law 104-52, 109 Stat. 468 (November 19, 1995), which required the Maili land be conveyed by the Administrator of the General Services Administration (GSA) to the State of Hawaii, with a simultaneous exchange to take place between the State of Hawaii and DHHL.

The proposed action allows for the use of the Maili property as a transitional housing project for the Leeward Coast, which includes a large contingent of Native Hawaiian families. The project includes five, two-story transitional housing buildings with 16 units each for a total of 80 units that can accommodate up to 300 people. It also includes a community learning center building with administrative offices, adult classrooms, a kitchen, dining/multi-purpose room, and a children's center with classrooms. There is also a receiving home named Hoomalu O Na Kamalii for children temporarily removed from abusive environments.

Failure to exchange the Maili property would have negative environmental impacts. In 2006, the State of Hawaii's Department of Health surveyed the Waianae coast of Oahu and found approximately 4,000 people, including women and young children, were living in compounds without adequate sanitation facilities. Raw sewage from these make-shift compounds found its way into the ocean, river and streams of Waianae, Hawaii. Following a no action alternative would push persons from transitional housing back to the homeless compounds that were polluting the environment.

Utilization of the Maili property by DHHL will also stem the vandalism, illegal littering/dumping, and random brush fires that damage the environment. Previous to the utilization of the property, GSA spent thousands of dollars each year protecting and maintaining the area.

---

Willie R. Taylor  
Acting, Deputy Assistant Secretary – Policy  
and Program Management

OHR:Kaiini Kaloi:kanderson:202-208-7462:April 3, 2009:  
MyDocuments:kKaloi:Draft EA\_Apr03  
Correction:Irs:4-14-2009

carrollcox.com