

Identifying Dangerous Contaminants on DHHL-Owned Properties in Hawai'i

An application for EPA Community-Wide Assessment Brownfield Funding

Application Information Sheet

1. Applicant Identification

- **Applicant Name:** Department of Hawaiian Home Lands (DHHL)
- **Applicant Address:** 91-5420 Kapolei Parkway, Kapolei, HI 96707
- **Unique Entity Identifier (UEI):** GVV8DG3H8GK1

2. Funding Requested

- **Grant Type:** Community-wide Assessment
- **Federal Funds Requested:** \$500,000
- **Contamination Type:** Hazardous Substances

3. Location

- **City:** East Kapolei (Headquarters)
- **County:** Honolulu, Kaua'i, Maui, and Hawai'i Counties (Statewide)
- **State:** Hawai'i

4. Target Area

The project focuses on sensitive communities across the 204,000-acre DHHL land trust, with specific priority areas including:

- **Kekaha, Kaua'i:** The former Kekaha Pesticide Mixing and Loading Area and the former Wood Treatment Plant.
- **Kalaeloa, O'ahu:** Former Barbers Point Naval Air Station lands impacted by military activity and potential UXO
- **Pana'ewa, Hawai'i:** The Hilo Auto Recycling site and adjacent agricultural homesteads.
- **Anahola, Kaua'i:** Projects including "Project Faith," the Anahola Bike Path, and the post-Iniki refuge site.
- **Wai'awa, O'ahu:** Identified for toxins assessment and potential phytoremediation.

5. Project Contact

- **Name:** Frank Hall
- **Title:** Project Director
- **Phone:** (808) 620-9500
- **Email:** frank.j.hall@hawaii.gov

6. Chief Executive / Highest Ranking Elected Official

- **Name:** Kali Watson
- **Title:** Chairman of the Hawaiian Homes Commission
- **Phone:** (808) 620-9500
- **Email:** DHHL.contactcenter@hawaii.gov

7. Population:

- 39,000 (29,000+ applicants on the DHHL waitlist; 10,000+ residents on leased DHHL properties)

8. Other Factors Checklist

The following factors apply to the DHHL project area and proposed assessment activities:

- **Community with a population of 10,000 or less:** Yes (Target sites including Anahola, Ho'olehua, and Kekaha are rural communities).
- **Identified "Recognized Environmental Conditions" (RECs):** Yes (Confirmed dioxin, arsenic, hazardous pesticides at Kekaha; UXO at Kalaeloa).
- **Sensitive Populations:** Yes (Beneficiaries living downwind/downstream of legacy industrial sites).
- **Rural Area:** Yes (The majority of the 200,000-acre trust is classified as rural agricultural or pastoral land).
- **Environmental Justice:** Yes



Hawai'i State Department of Health
Hazard Evaluation and Emergency Response Office

January 26, 2026

Office of Brownfields and Land Revitalization
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

DRAFT

Subject: State Acknowledgment of the Department of Hawaiian Home Lands (DHHL) Application for FY26 EPA Brownfield Community-Wide Assessment Grant Funds

To the EPA Brownfields Selection Committee,

The State of Hawai'i Department of Health (HDOH), Hazard Evaluation and Emergency Response (HEER) Office, hereby acknowledges that the **Department of Hawaiian Home Lands (DHHL)** is applying for **\$500,000 in FY26 federal Brownfields Community-Wide Assessment Grant** funding in to conduct environmental assessment activities.

DHHL has informed the HEER Office that these funds will be used to prioritize the assessment of hazardous substances (including dioxins, lead, arsenic, and potential military munitions) at key sites across the Hawaiian Home Lands trust, specifically focusing on:

- **Kekaha, Kaua'i:** The former Pesticide Mixing and Loading Area and Wood Treatment Plant.
- **Kalaeloa, O'ahu:** Former Barbers Point Naval Air Station lands burdened by military-industrial legacy and Unexploded Ordnance (UXO).
- **Statewide Portfolio:** Additional rural and housing-priority sites identified through DHHL's portfolio analysis.

HEER supports DHHL's efforts to characterize these sites, which are critical to expanding 99-year homestead leases and to mitigating health disparities within the Native Hawaiian community. We understand and have communicated to DHHL that these assessment activities shall be conducted in accordance with HDOH's Technical Guidance Manual (TGM) standards and screened against our Tier 1 Environmental Action Levels (EALs).

Should DHHL be selected for this award, HEER staff are prepared to provide regulatory oversight and technical consultation to ensure the successful revitalization of these properties.

Sincerely,

[NAME]
Brownfields Program Manager
Hazard Evaluation and Emergency Response (HEER) Office
Hawai'i State Department of Health
[EMAIL]
[PHONE NUMBER]

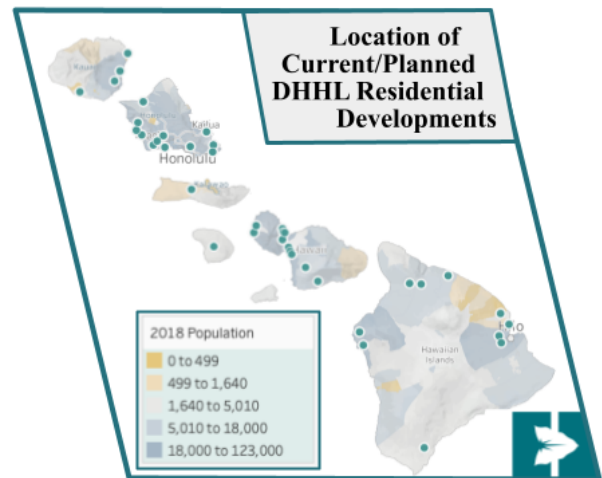
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Executive Summary

The Mission & The Challenge

The Department of Hawaiian Home Lands (DHHL) manages a unique 204,000-acre land trust created by the Hawaiian Homes Commission Act of 1920. DHHL's mandate is to return native Hawaiians to the land through 99-year homestead leases for residential, agricultural, and pastoral use. This mission is severely *obstructed by legacy contamination* on properties acquired from former sugar plantations, the U.S. military, and others.



Across the state, priority sites harbor Recognized Environmental Conditions (RECs) that range from *agrochemical residuals* (dioxins, arsenic) to military-specific hazards, including *Unexploded Ordnance (UXO)*. These environmental liabilities have stalled development for the 29,000+ beneficiaries currently on the waitlist. Without technical environmental data, these lands remain too risky to develop, yet too valuable to ignore.

The Proposed Solution

This EPA Community-wide Assessment Grant (\$500,000) will fund a strategic assessment pipeline to inventory, characterize, and de-risk these properties. DHHL will utilize a Portfolio Approach, focusing on high-priority flagship sites while maintaining the flexibility to assess additional sites statewide as needs arise.

Priority Target Areas

- **Kekaha, Kaua'i (Agrochemical Legacy):** A former sugar plantation hub burdened by arsenic and dioxins. Assessment is critical to *clearing land for subsistence farming (taro/mango) and community centers*. Building on the momentum of the County of Kaua'i's 2021-2025 Kekaha Road study,¹ DHHL will address the remaining *data gaps* at the Pesticide Mixing and Wood Treatment sites to ensure the entire corridor is safe for residential and agricultural reuse.
- **Kalaeloa, O'ahu (Military Legacy):** Former Naval Air Station lands impacted by petroleum, solvents, and potential UXO. Assessment will de-risk these parcels for *commercial revenue generation, renewable energy projects, and or other purposes*.

¹ <https://kauaiforward.com/kekaha-brownfields-study/>, accessed January 16, 2026.

- **Statewide Portfolio:** A flexible allocation to address emerging needs at sites such as Pana'ewa (Hawai'i) and Anahola (Kaua'i), ensuring environmental clearance keeps pace with housing demand.

Leveraging & Implementation Strategy

This assessment grant is essential to unlocking a massive development engine. DHHL has secured more than \$600 million in Act 279 state funding for infrastructure and housing construction. However, these funds cannot be deployed until environmental hazards are defined and mitigated and, to maximize the number of properties it can develop, DHHL prioritizes Phase I assessments of properties with the lowest risk of contamination.

- **From Assessment to Construction:** Data gathered under this grant will support remedial planning (ABCAs²), allowing DHHL to immediately pivot to cleanup and then to using State, HUD NAHASDA, and private developer financing to commence construction.
- **Partnerships:** The project leverages partnerships with the Hawai'i Department of Health for regulatory oversight and private developers to finance and build housing.

Expected Outcomes

By transforming liabilities into assets, this project will ensure that the land returned to beneficiaries for their "forever homes" is safe, fulfilling the 100-year-old promise of the Hawaiian Home Lands trust.



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2. Community Need and Community Engagement
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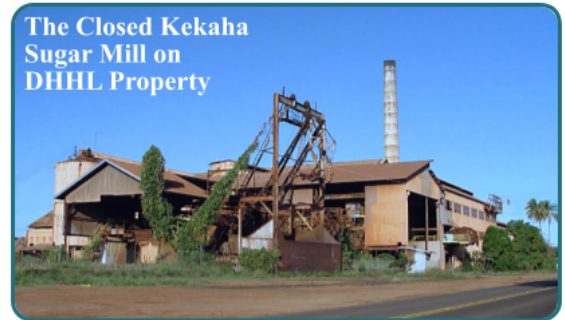
1. Project Area Description and Plans for Revitalization

The Department of Hawaiian Home Lands (DHHL) manages a unique 204,000-acre land trust created by the Hawaiian Homes Commission Act of 1920. The department's mandate is to return native Hawaiians to the land through 99-year homestead leases for residential, agricultural, and pastoral use. However, this mission is severely obstructed by legacy contamination on properties acquired from former sugar plantations and the U.S. military.

Across Hawai'i, priority sites harbor Recognized Environmental Conditions (RECs) ranging from agrochemical residuals (dioxins, arsenic) to military-specific hazards including

² Analysis of Brownfield Cleanup Alternatives

Unexploded Ordnance (UXO). These environmental liabilities have stalled development on properties that would otherwise be a resource for reducing the 29,000+ beneficiaries waitlist. This grant will fund a community-wide assessment strategy to *inventory, characterize, and de-risk* these properties, focusing on the high-priority sites of Kekaha (Kaua'i) and Barbers Point (O'ahu) while maintaining the flexibility to assess additional sites within the portfolio as needs arise.

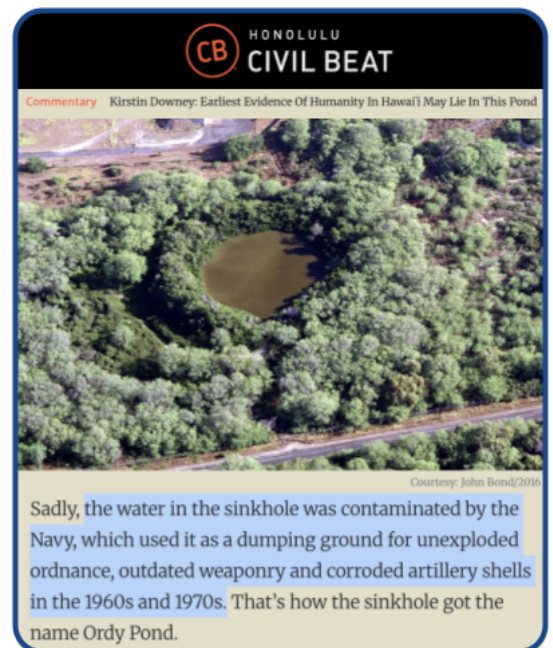


a. Primary Priority Site: Kekaha, Kaua'i

- **History:** The "Kekaha Herbicide Mixing and Wood Treatment Facility" (EPA ID HID00875203) served as a hub for mixing arsenic-based herbicides and treating plantation infrastructure for decades.
- **Contaminants:** Preliminary reports identify soil and stream sediments impacted by dioxins, arsenic, and organochlorine pesticides at levels exceeding Hawai'i Department of Health (HDOH) action levels.
- **Physical Hazards:** The site contains uninvestigated abandoned infrastructure, including sumps, drums, and underground piping that have not been fully characterized.
- **Impact:** These brownfields are adjacent to the Waiawa Valley, an area designated for traditional agriculture (taro and mango). The fear of contaminant migration has stalled the revitalization of these lands for subsistence farming and housing.

b. Priority Site: Former Barbers Point Naval Air Station (Kalaeloa), O'ahu

- **History:** Comprising approximately 586 acres transferred to DHHL between 2002 and 2008,³ these lands were acquired through the Hawaiian Home Lands Recovery Act (HHLRA) of 1995 and the **Base Realignment and Closure (BRAC) process**.⁴ The transition from military to trust land was intended to facilitate economic development and revenue generation for the homestead program.
- **Contaminants:** The site faces complex challenges, including widespread petroleum/solvent impacts, lead from former firing ranges, and chemicals in drainage canals likely from firefighting foams.
- **Physical Hazards:** A critical concern is the presence of Unexploded Ordnance (UXO)



³ Source: U.S. Department of the Interior, HHLRA Land Settlement Background and Status. ([link](#))

⁴ While the U.S. Navy typically retains liability for contamination and UXO even after transfer, these specific parcels were transferred 'as-is.'

from historical training activities, alongside abandoned military sumps and disposal pits.

- **Impact:** These hazards prevent the "highest and best use" of the land for revenue generation and community facilities, significantly increasing development costs.

c. Tertiary Priority: Statewide Portfolio & Emerging Sites (Adaptive Assessment Strategy)

- **Scope:** Beyond the flagship sites, DHHL manages a diverse portfolio across its 204,000-acre trust, where environmental uncertainty halts development. This category allows DHHL to deploy assessment funds flexibly across the island chain. DHHL will use grant funds to conduct Phase I ESAs and Site Inventory updates on a rolling basis. If a Phase I identifies RECs, DHHL will pivot resources to immediately conduct Phase II testing, preventing administrative delays in the housing pipeline.
- **Target Sites:** Potential target sites include the following, to be confirmed upon selection of Qualified Environmental Professionals (QEPs).
 - Pana'ewa (Hawai'i Island): Assessing the former Hilo Auto Recycling site and adjacent agricultural homesteads for heavy metals and fluids.
 - Anahola (Kaua'i): Conducting due diligence for community assets such as the Anahola Bike Path and "Project Faith" center.
 - Wai'awa (O'ahu): A future master-planned community requiring baseline environmental clearance.



d. Revitalization Planning

Reuse Strategy:

DHHL's revitalization plan uses assessment data to unlock land for three primary purposes:

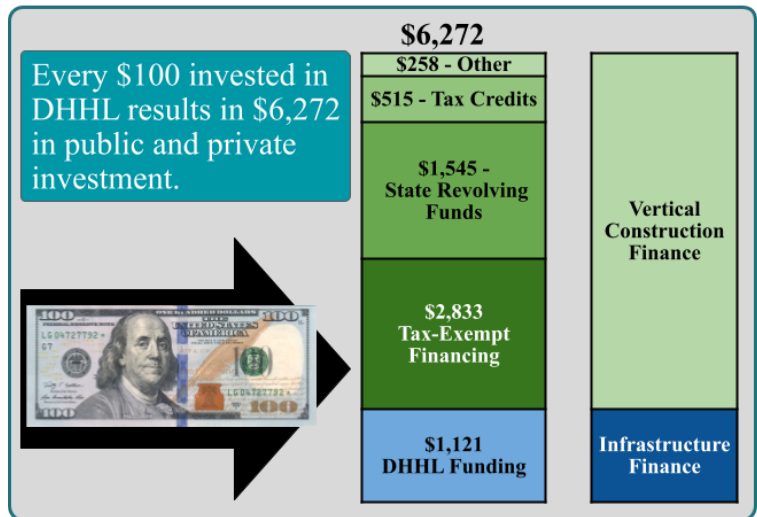
- **Homesteading (99-Year Leases):** Ensuring lands are safe for long-term residential and agricultural leases. This includes verifying soil safety for backyard gardening and subsistence farming (taro/mango) in places such as Kekaha.
- **Community & Economic Development:** In Kalaeloa, reuse plans focus on industrial and commercial development to generate revenue that supports the trust, alongside renewable energy initiatives. In Kekaha, plans include an "Extreme Sports Complex" and recreation areas for local youth.
- **Remedial Planning:** Evaluating the feasibility of green technologies, such as phytoremediation, to inform future Cleanup Grant applications.

Outcomes: This project will deliver the "decision-ready" technical data required to transition these sites from liabilities to assets. Delineating contamination and planning for remediation will enable the construction of homes and community facilities, directly addressing DHHL's housing waitlist.

e. Strategy for Leveraging Resources

DHHL views this EPA Assessment Grant as critical to unlocking a much larger, fully funded development engine. With the agency securing more than \$600 million in state and federal infrastructure funding, EPA funding will be used to overcome the environmental hurdles that prevent the agency from adding significant properties into its development program. Each lot that clears environmental obstacles “unlocks” an additional \$810,000 in additional economic activity – \$180,000 for DHHL-built infrastructure and \$630,000 in private developer-funded housing construction.

- **Leveraging Existing State Development Funds.** Once DHHL has assessed and cleared a site using EPA funds, the agency will be able to transition to developing the property. This includes leveraging the *\$600 million in state funding* to build site infrastructure work (roads, sewer, water) that is the backbone of DHHL’s housing development program. EPA assessment data will give the "green light" to release these state funds for site work.
- **Developer Partnerships Create a Funding Multiplier:** Once site infrastructure development is in progress, DHHL identifies and hires private developers, who leverage HUD *NAHASDA*, Hawai'i Dwelling Unit Revolving Fund (*DURF*), and *private financing* to finance and build vertical construction. Following construction, homes are sold to beneficiaries for the cost of the housing construction (land is leased for \$1/year).
- **Additional EPA Funding:** The foundational assessment activities funded by this grant are designed to de-risk high-priority sites, making them eligible for a DHHL application for subsequent *EPA Multipurpose and Cleanup Grants* (averaging \$1 million and \$3 million).

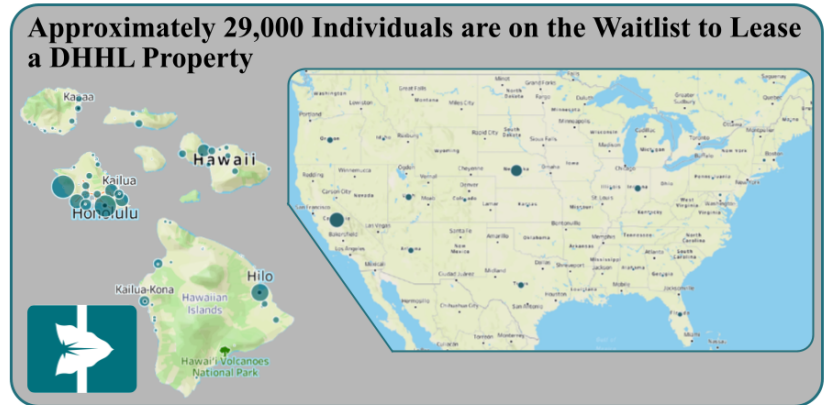


Combined, this multi-layered resource strategy transforms underutilized and environmentally burdened sites into viable assets, clearing the path for safe, affordable housing and sustainable agricultural use for the 29,000+ waitlist beneficiaries and a pipeline from assessment to remediation.

2. Community Need and Community Engagement

DHHL serves a population of over 29,000 native Hawaiian beneficiaries on a housing waitlist, many of whom reside in rural, economically distressed communities that are disproportionately impacted by legacy industrial and agricultural contamination. These

"sensitive populations" often live on trust lands situated downwind or downstream of high-risk sites, such as the former Kekaha Pesticide Mixing Area, where unquantified levels of dioxins, arsenic, and hazardous pesticides pose direct threats to both public health and essential agricultural resources, including taro and mango. With a median income nearly 10% lower than the statewide average,⁵ these communities lack the independent financial capacity to address the multi-million-dollar environmental liabilities on their lands. This assessment project is therefore a critical environmental justice initiative, aimed at removing the underutilized and environmentally burdened sites that have for decades stalled the delivery of safe, affordable homesteads to native Hawaiian families.



To ensure that land revitalization aligns with the priorities of the people it serves, DHHL will use its extensive existing network of beneficiary and homestead associations as the primary vehicle for community engagement. The engagement strategy focuses on the "Greening of Brownfields," incorporating health monitoring for high-risk residents and involving the community in the development of culturally relevant reuse plans, such as the restoration of agricultural tracts for taro cultivation and the implementation of phytoremediation pilots. By partnering with local homestead leaders and academic researchers, DHHL will empower residents to transition from being passive neighbors of contaminated sites to active participants in a circular economy that prioritizes renewable energy and food sovereignty. This transparent, community-led process ensures that the transition to "Unrestricted Land Use" status not only meets technical safety standards but also honors the ancestral connection of the beneficiaries to the 'āina (land).

a. Community's Need for Funding

Health and Welfare:

The target community consists of Native Hawaiian beneficiaries who disproportionately suffer from documented health disparities – Native Hawaiian women have the *highest all-cancer mortality rate in the state* (180 per 100,000), compared to the state average of 110 per 100,000. For men, the death rate is 216 per 100,000, far exceeding the state population average of 158 per 100,000.⁶ Residents living downwind and downstream of the former pesticide mixing area face potential exposure to legacy carcinogens (dioxins/arsenic). The community relies on local subsistence fishing and farming, which may be threatened by soil contamination.

⁵ Source: DHHL Beneficiaries Study Applicant Report, 2020. ([link](#))

⁶ Source: JCO Oncology Practice, "Navigating Native Hawaiian and Pacific Islander Cancer Disparities" (2021/Updated 2025). ([link](#))

Financial Need:

DHHL beneficiaries often face economic hardship, and the Department itself operates with limited funds strictly prioritized for housing construction. This includes trust funds that are statutorily prioritized for housing construction, leaving no discretionary budget for environmental assessments. Without EPA funding, DHHL lacks the discretionary budget to perform the high-cost, high-resolution sampling (e.g., dioxin analysis) required to clear these complex sites. Without EPA funding, these sites will remain uncharacterized and unusable.

b. Community Engagement

Engagement Methods:

DHHL will use its strong existing network of beneficiary and homestead associations as the primary vehicle for engagement.

- **Public Meetings:** Quarterly meetings in Kekaha to present Sampling and Analysis Plans (SAPs) and risk assessment results.
- **Culturally Relevant Outreach:** Materials will be produced in English and 'Ōlelo Hawai'i, focusing on "healing the 'āina" (land) to ensure concepts are accessible.
- **Partnerships:** Collaboration with HDOH's Hazard Evaluation and Emergency Response (HEER) Office and the University of Hawai'i College of Tropical Agriculture (UH-CTAHR) to provide independent technical interpretation of data for residents.

3. Task Descriptions, Cost Estimates, and Measuring Progress

DHHL has developed a comprehensive implementation plan to manage the \$500,000 Community-wide Assessment Grant. The primary objective of this project is to move identified brownfield sites toward unrestricted residential and agricultural use. The budget strategically prioritizes direct technical action, with more than 70% of the total funds (\$351,000) dedicated to contractual services for Phase I and Phase II Environmental Site Assessments (ESAs). These technical tasks include site discovery and inventory, the creation of robust SAPs for priority locations such as Kekaha, and the development of site-specific remediation or reuse plans. Additionally, \$46,000 (9.2%) is allocated for community outreach and supplies to ensure that beneficiaries are integral partners in the revitalization of their lands. All sampling results will be screened against the HDOH HEER Office 'Tier 1 Environmental Action Levels (EALs)' specifically for Unrestricted (Residential) Land Use.

Measuring progress and ensuring technical accountability are central to the project's design. DHHL commits to executing a comprehensive SAP for high-priority sites within 18 months of receiving funding. Success will be defined by the successful delineation of the lateral and vertical extent of contaminants, particularly the dioxins, arsenic, and hazardous pesticides that currently hinder homestead development. The ultimate metric for project performance is the alignment of all assessed sites with HDOH "Unrestricted Land Use" action levels. Progress will be rigorously tracked through quarterly environmental monitoring and performance measurement reports, ensuring that the transition from an underutilized and

environmentally burdened site to revitalized homesteads remains on schedule and within the established budget.

a. Project Implementation Plan

DHHL will execute all activities within a three-year performance period (October 2026 – September 2029) to ensure high-quality data collection and extensive community consultation.

Task Name	Description & Key Activities	Aligned Project Goal/Output
1. Leadership	Oversight of the cooperative agreement, quarterly reporting to EPA, ACRES database updates, and financial management.	Outputs: 12 Quarterly Reports, 1 Final Report, timely ACRES updates.
2. Site Assessments (Phase I & II)	Core Technical Task. Contract Qualified Environmental Professionals (QEPs) to: 1. Conduct Phase I ESAs on lower-priority sites. 2. Develop SAPs for Kekaha. 3. Conduct Phase II sampling to delineate dioxin/arsenic extent. 4. Inventory abandoned infrastructure (sumps/tanks).	Outputs: 4-6 Phase I ESAs, 1 Quality Assurance Project Plan (QAPP), 2-3 Phase II ESA Reports, Contaminant Delineation Maps.
3. Cleanup & Reuse Planning	Developing Analysis of Brownfield Cleanup Alternatives (ABCAs) and Remedial Action Plans (RAPs) based on assessment data. Includes feasibility study for phytoremediation (bench-scale or desktop analysis).	Outputs: 2 ABCAs, 2 Remedial Action Plans, 1 Site Reuse Vision Document.
4. Community Engagement	Hosting community meetings, printing fact sheets, and translating technical summaries for beneficiaries.	Outputs: 6 Community Meetings, 3 Fact Sheets, Website Updates.

Implementation Strategy

DHHL is prepared to commence the Kekaha and Waiawa Valley Brownfield Assessment project immediately upon the award of funds, with an anticipated start date of October 1, 2026, and a targeted completion date of September 30, 2028. This 24-month implementation strategy utilizes a blend of internal DHHL project management and specialized Qualified Environmental Professionals (QEP) to ensure the timely delivery of a comprehensive SAP, high-resolution site characterizations, and actionable reuse strategies for agricultural and community revitalization.

b. Project Schedule

- **Year 1 (October 2026 – September 2027):** Mobilization, QEP Selection, EPA Workplan approval, Phase I ESAs, Community Kick-off meetings.
- **Year 2 (Oct 2027 – Sept 2028):** SAP/QAPP development, Field Work (Phase II Sampling) at Kekaha and Wai‘awa, Interim Community updates.
- **Year 3 (Oct 2028 – Sept 2029):** Lab Analysis (Dioxins), Data Validation, Risk Assessments, Development of ABCAs and Remedial Action Plans, Final Community Presentation of findings.

YEAR 1: Mobilization & Phase I Assessments (Oct 2026 – Sept 2027)

Task	Q1 (Oct-Dec)	Q2 (Jan-Mar)	Q3 (Apr-Jun)	Q4 (Jul-Sep)	Deliverable/Milestone
Task 1: Project Management	☐	☐	☐	☐	Quarterly Reports 1-4
<i>Select Qualified Env. Professional (QEP)</i>	●				Contract Executed
<i>EPA Workplan & ACRES Setup</i>	●				Profile Active
Task 2: Site Assessments		☐	☐	☐	
<i>Phase I ESAs (Priority Sites)</i>		☐	☐		4-6 Phase I Reports
<i>Draft SAP for Kekaha</i>			☐	●	Draft SAP Submitted
Task 3: Reuse Planning					<i>(Planning begins Y2)</i>
Task 4: Community Engagement		☐			
<i>Beneficiary Kick-off Meeting</i>		●			Mtg Minutes / Fact Sheet 1

YEAR 2: Phase II Field Work & Data Collection (Oct 2027 – Sept 2028)

Task	Q5	Q6	Q7	Q8	Deliverable/Milestone
Task 1: Project Management	☐	☐	☐	☐	Quarterly Reports 5-8
<i>ACRES Data Entry</i>	☐	☐	☐	☐	Site Data Updated
Task 2: Site Assessments	☐	☐	☐		
<i>Finalize SAP & QAPP w/ EPA & DOH</i>	●				EPA Approval of QAPP
<i>Field Work: Soil/Sediment Sampling</i>		☐	☐		Samples Shipped to Lab
<i>Infrastructure Inventory (Sumps/Drums)</i>			☐		Inv. List Complete
Task 3: Reuse Planning				☐	
<i>Green Tech Feasibility (Desktop Study)</i>				☐	Feasibility Memo
Task 4: Community Engagement			☐		
<i>Field Work Update Meeting</i>			●		Community Presentation

YEAR 3: Analysis, Reporting & Remedial Planning (Oct 2028 – Sept 2029)

Task	Q9	Q10	Q11	Q12	Deliverable/Milestone
Task 1: Project Management	☐	☐	☐	●	Final Closeout Report
Task 2: Assessment Reporting	☐	☐			
<i>Lab Analysis (Dioxins/Arsenic)</i>	☐				Lab Data Packages
<i>Final Phase II ESA Reports</i>		●			2-3 Phase II Reports
Task 3: Cleanup & Reuse Planning		☐	☐	☐	
<i>Risk Assessment (Human Health/Eco)</i>		☐			Risk Assessment Report
<i>Analysis of Cleanup Alts (ABCA)</i>			●		2 ABCAs Completed
<i>Remedial Action Plans (RAP)</i>				●	2 RAPs Completed
Task 4: Community Engagement			☐		
<i>Final Results Presentation</i>			●		"Is it Safe?" Meeting

☐ = Ongoing Activity

● = Key Milestone / Deliverable Completion

c. Outputs

The project will produce the following tangible outputs:

- Within 18 months of funding, execute a comprehensive **Sampling and Analysis Plan**.
- Within 24 months, securely **remove and dispose of all physical RECs** (Recognized Environmental Conditions) – assuming that additional funding is obtained.⁷
- Conduct **quarterly environmental monitoring** to ensure contaminant levels remain consistently below HDOH "Unrestricted Land Use" action levels.
- By the end of the project, finalize **Redevelopment Plans** for repurposing lands and improving waste efficiency as a means to increase new home delivery and enhance community infrastructure.

d. Cost Estimates

- **Personnel/Fringe (\$84,000):** DHHL Project Director (0.3 FTE) and administrative support to oversee grant compliance and contractor management.
- **Travel (\$10,000):** EPA Brownfields Conference (required) and inter-island travel for site visits.
- **Contractual (\$351,000):** QEP services for Phase I/II ESAs (\$265k) and Reuse/Cleanup Planning (\$86k). This is the largest portion of the budget, reflecting the high cost of dioxin laboratory analysis. Anticipated to include at least the following:
 - Phase II ESA & SAP: Development of the Quality Assurance Project Plan (QAPP) and SAP specifically for the 2011 "uninvestigated areas" (sumps, drums, and tanks).
 - Field Sampling Labor: Contracted environmental technicians to collect soil, stream sediment, and plant tissue (taro/mango) samples using Decision Unit (DU) increments.
 - Laboratory Analysis: High-resolution mass spectrometry for Dioxins/Furans, plus testing for Arsenic, Lead, and organochlorine pesticides.
 - Phytoremediation Pilot Study: A sub-award or contract to a university partner (e.g., UH-CTAHR) to design the initial "living lab" research plot mentioned in project goals.
- **Supplies (\$30,000):** Community outreach materials, venue rentals, and translation services.
- **Indirect Costs (\$25,000):** Capped at 5% of the total grant award to comply with EPA administrative cost limits.

Budget Category	Task 1 Leadership	Task 2 Assessment	Task 3 Planning	Task 4 Outreach	Indirect Costs ⁸	Total	% of Total
Personnel	\$30,000	-	\$15,000	\$15,000	\$16,964	\$76,964	15.4%

⁷ **Note:** DHHL recognizes that REC removal/disposal is not an eligible expense for Brownfield Assessment grant funding. No Assessment Grant funding will be used for removal and/or disposal activities.

⁸ Capped at 5% of the total grant award to comply with EPA administrative cost limits.

Budget Category	Task 1 Leadership	Task 2 Assessment	Task 3 Planning	Task 4 Outreach	Indirect Costs ³	Total	% of Total
Fringe Benefits	\$12,000	-	\$6,000	\$6,000	\$6,786	\$30,786	6.2%
Travel	\$6,000	\$4,000	-	-		\$10,000	2.0%
Contractual	\$0	\$265,000	\$86,000	-		\$351,000	70.2%
Supplies	\$0	\$5,000	-	\$25,000	\$1,250	\$31,250	6.3%
TOTAL	\$48,000	\$274,000	\$107,000	\$46,000	\$25,000	\$500,000	100.0%
% of Total	9.6%	54.8%	21.4%	9.2%	5.0%	100.0%	

e. Performance Measurement Plan

DHHL is a state agency with decades of experience managing federal funds (e.g., HUD NAHASDA grants). The project will be managed by Frank Hall, LMD Administrator, supported by the Planning Office and Land Management Division.

f. Organizational Capacity

DHHL possesses *unrivaled experience managing complex, large-scale projects* in Hawai'i's unique regulatory and geographic environment. The agency is currently administering the historic \$600 million in Act 279 state funding, an unprecedented investment that has significantly expanded DHHL's development activities. This requires sophisticated financial tracking and compliance systems. DHHL regularly completes comprehensive Island Development Plans and fulfills rigorous Environmental Impact Statements (EISs) and Environmental Assessments (EAs) in accordance with both state and NEPA requirements. This institutional expertise will be directly applied to the technical assessments of landfill sites and the evaluation of waste-to-energy technologies.

g. Organizational Structure

Key Staff

- **Kali Watson (Chairman of the Hawaiian Homes Commission):** Provides strategic vision for the project, ensuring that waste management planning is seamlessly integrated into DHHL's broader mission of land development and beneficiary service. With decades of experience in Hawaiian housing and land trust management, Chairman Watson oversees the agency's response to the critical needs of the 29,000+ waitlist applicants, 10,000+ lessees, and other beneficiaries.
- **Frank Hall (Project Director):** As Administrator of the Land Management Division (LMD), Mr. Hall will serve as the primary Project Director for this grant. On a day-to-day basis, Mr. Hall oversees the management of the 200,000-acre land trust, including legacy properties, closed landfills, and QEP. His team will lead the efforts to identify and assess specific sites for repurposing, ensuring that all plans align with the agency's long-term land-use policies and cultural stewardship goals and coordinate with HDOH.
- **Kalani Fronda, Acting Administrator, Land Development Division (LDD):** Mr. Fronda is responsible for the design and construction of the public infrastructure – including roads, water, and sewage systems – that serves as the foundation for all

homestead developments. Mr. Fronda's extensive experience in managing multi-million-dollar infrastructure projects ensures that the technical planning for waste-to-energy and landfill reuse is both feasible and constructible.

h. Strategy for Acquiring Additional Resources

DHHL's strategy relies on a phased funding pipeline, transitioning from initial assessment to large-scale remediation and infrastructure development. Upon completion of the Phase II ESAs at priority locations such as Kekaha, the department and ABCAs funded by this grant, DHHL will aggressively pursue *EPA Brownfields Cleanup Grants*. These follow-on funds will be utilized to execute the site-specific remediation plans developed under this assessment grant, focusing on the removal of dioxin-impacted soils and the decommissioning of legacy industrial debris. By securing these resources, DHHL will mitigate the environmental liabilities that currently prevent Public-Private Partnerships (P3s) from investing in residential construction on trust lands, effectively shifting the financial burden of underutilized and environmentally burdened sites away from native Hawaiian beneficiaries.

In parallel with brownfield remediation, DHHL is strategically layering infrastructure-specific grants to address the holistic needs of its rural communities. This includes a current \$1 million USDA Rural Decentralized Water Systems (DWS) Grant application in partnership with Hawai'i Community Lending to establish a Revolving Loan Fund for cesspool mitigation – a critical step for any new residential development. Furthermore, the department is targeting Clean Water State Revolving Funds (CWSRF) and IJA allocations.⁹ Integrating these clean water resources with brownfield cleanup efforts will meet water infrastructure needs, ensuring that once sites are assessed and cleaned, they are "shovel-ready" for housing, agricultural, or other uses.

i. Previous Federal Financial Assistance Agreements

DHHL manages diverse federal funding streams, including nearly \$30 million in USDA Rural Development funding and annual Native American Housing Assistance and Self-Determination Act (NAHASDA) funding. The agency integrates fiscal operations into the State's Financial Information System (FIS) and undergoes rigorous Single Audits (2 CFR Part 200), ensuring low risk and high capacity for managing EPA funds.

4. Summary & Conclusion

The Department of Hawaiian Home Lands (DHHL) is seeking \$500,000 in EPA Brownfields Assessment Grant funding to execute a high-impact assessment strategy across its 204,000-acre land trust. The project targets the release of critical lands for 99-year homestead leases, focusing on the agrochemical legacy of Kekaha, Kaua'i, and the military-industrial challenges (UXO) at Kalaeloa, O'ahu. These sites, currently burdened by unquantified environmental liabilities, represent the primary bottleneck preventing the

⁹ IJA allocations have designated over \$160 million for Hawai'i to modernize aging water and wastewater systems.

development of safe housing and community facilities for the 29,000+ Native Hawaiian beneficiaries on the waitlist.

By executing strategic Sampling and Analysis Plans (SAPs) and developing Remedial Action Plans (RAPs), DHHL will utilize these funds to delineate the threats to people posed by dioxins, arsenic, and unexploded ordnance. This technical data is the essential prerequisite to unlocking DHHL's massive development engine, including over \$600 million in Act 279 state infrastructure funding and HUD NAHASDA resources.

This project serves as the vital "Assessment-to-Planning" bridge in a larger statewide revitalization initiative. The successful characterization of these sites will mitigate legal and physical risks, catalyze public-private partnerships, and transition unusable lands into decision-ready assets. Ultimately, this grant empowers DHHL to fulfill its fiduciary duty: healing the 'āina to secure safe, forever homes for the next generation of Native Hawaiians.



Megan Hadley/West Hawaii Today Kahu Danny and Anna Akaka perform a blessing for the ground breaking in Kealakehe to mark the beginning of a \$13.8 million capital improvement project that will provide 125 lots for Native Hawaiian beneficiaries.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="500,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="500,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed: