DAVID Y. IGE
GOVERNOR

FILE COPY

APR 2 3 2021

JADE T. BUTAY
DIRECTOR

Deputy Directors
LYNN A.S. ARAKI-REGAN
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

IN REPLY REFER TO:
AIR-EP
21.0034

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

April 16, 2021

TO: KEITH KAWAOKA
ACTING DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
DEPARTMENT OF HEALTH

FROM: JADE T. BUTAY
DIRECTOR OF TRANSPORTATION

SUBJECT: FINAL ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT FOR MILLION AIR – KALAELOA AIRPORT FIXED BASE OPERATION AND FUEL FARM FACILITY
KALAELOA, OAHU, HAWAII
TMKs: (1) 9-1-013:032 (POR.) AND 076 (POR.)

The State of Hawaii, Department of Transportation (HDOT), requests the publication of the Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility Final Environmental Assessment and Finding of No Significant Impact Determination in the next available edition of The Environmental Notice.

HDOT has reviewed the Applicant's environmental study, the public comments received during the 30-day public review period, and the responses to the comments. Based on the significance criteria in Hawaii Administrative Rules, Section 11-200.1-13, HDOT has determined that the proposed action will have no significant adverse effects on the natural or human environment.

If you have any questions, please contact Mr. Herman Tuiolosega, HDOT Airports Division's Head Planner, at 838-8810 or by email to herman.tuiolosega@hawaii.gov.

Enclosure: Final Environmental Assessment

c: Mr. Scott Freeman, Freeman Holdings of Hawaii, LLC dba Million Air Honolulu

21-147

From: webmaster@hawaii.gov
To: HI Office of Environmental Quality Control
Subject: New online submission for The Environmental Notice
Date: Monday, April 19, 2021 2:27:53 PM

Action Name

Million Air - Kalaeloa Airport FBO and Fuel Farm Facility

Type of Document/Determination

Final environmental assessment and finding of no significant impact (FEA-FONSI)

HRS §343-5(a) Trigger(s)

- (1) Propose the use of state or county lands or the use of state or county funds

Judicial district

ʻEwa, Oʻahu

Tax Map Key(s) (TMK(s))

(1) 9-1-013:032 (por.); (1) 9-1-013:076 (por.)

Action type

Applicant

Other required permits and approvals

Numerous

Discretionary consent required

HCDA Development Permit

Approving agency

State of Hawaii, Department of Transportation, Airports Division

Agency contact name

Herman Tuiolosega

Agency contact email (for info about the action)

herman.tuiolosega@hawaii.gov

Email address or URL for receiving comments

publiccomment@wilsonokamoto.com

Agency contact phone

(808) 838-8810

Agency address

400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819-1880
United States
Map It

Applicant

Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu

Applicant contact name

Scott Freeman

Applicant contact email

sfreeman@pvillc.com

Applicant contact phone

(913) 951-5600

Applicant address

16221 Foster Street
Overland Park, Kansas 66085
United States
Map It

Was this submittal prepared by a consultant?

Yes

Consultant

Wilson Okamoto Corporation

Consultant contact name

Rebecca Candilasa

Consultant contact email

rcandilasa@wilsonokamoto.com

Consultant contact phone

(808) 946-2277

Consultant address

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
United States
Map It

Action summary

The proposed action involves construction of a Fixed Base Operation (FBO) and Fuel Farm Facility located on adjacent sites at the Kalaeloa Airport (JRF). The proposed FBO will provide aviation services, such as parking and hangar space, to the general aviation (GA) community. Conceptually, the proposed program may consist of approximately 30,000 SF for a GA aircraft hangar; approximately 8,000 SF for a two-story office area; and approximately 2,000 SF for a ground service maintenance area. Fuel will be provided at the proposed Fuel Farm Facility, which is anticipated to encompass up to eight (8) 30,000-gallon Jet A Fuel above-ground, horizontal storage tanks. Also proposed for storage at the Fuel Farm Facility is up to one (1) 15,000-gallon Aviation gas (Avgas) tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon gas tanks used by various motor vehicles (mogas).

Reasons supporting determination

Refer to Chapter 6 of the Final EA

Attached documents (signed agency letter & EA/EIS)

- Final-EA_Million-Air-JRF-FBO-and-Fuel-Farm-Facility_20210416.pdf
- AIR-EP-21.0034-FEA-FONSI-for-Million-Air-Kalaeloa-Airport-Fixed-Based-Operation-and-Fuel-Farm-Facility1.pdf

Shapefile

- The location map for this Final EA is the same as the location map for the associated Draft EA.

Action location map

- JRF_FBOandFF_ProjectSite.zip

Authorized individual

Rebecca Candilasa

Authorization

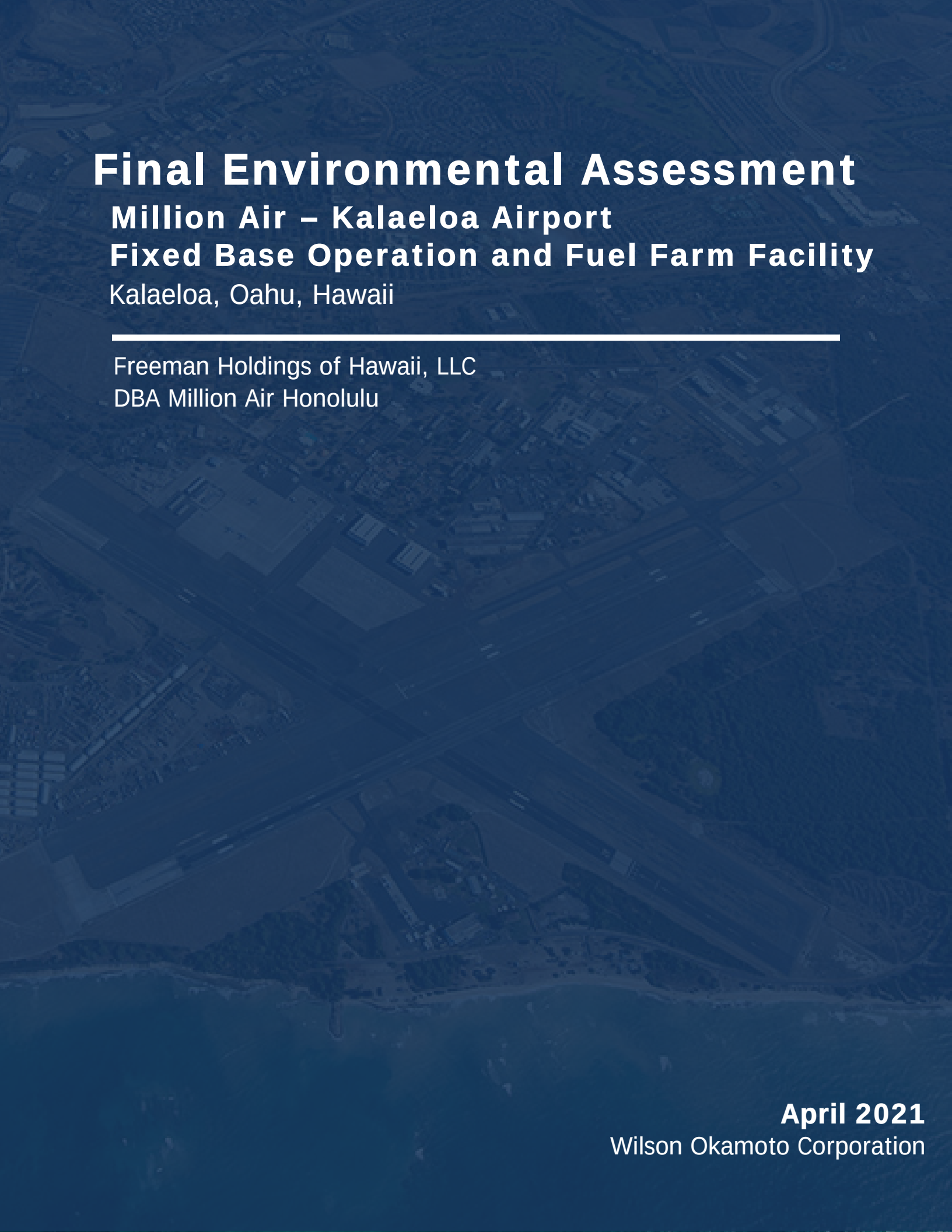
- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

Final Environmental Assessment

Million Air – Kalaeloa Airport
Fixed Base Operation and Fuel Farm Facility

Kalaeloa, Oahu, Hawaii

Freeman Holdings of Hawaii, LLC
DBA Million Air Honolulu



April 2021

Wilson Okamoto Corporation

FINAL ENVIRONMENTAL ASSESSMENT

Million Air – Kalaeloa Airport
Fixed Base Operation and Fuel Farm Facility

Kalaeloa, Oahu, Hawaii
TMKs: (1) 9-1-013:032 (por.) and 076 (por.)

Approving Agency:

State of Hawaii
Department of Transportation, Airports Division
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Prepared for Applicant:

Freeman Holdings of Hawaii, LLC
DBA Million Air Honolulu
16221 Foster Street
Overland Park, Kansas 66085

Prepared by:

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

WOC Job No. 10613-01

April 2021

TABLE OF CONTENTS

Page

PREFACE P-1

SUMMARY S-1

1. INTRODUCTION 1-1
- 1.1. Background 1-3
- 1.2. Project Location 1-3
- 1.3. JRF History 1-9
- 1.4. Previous Environmental Documentation at JRF 1-9
- 1.5. JRF Master Plan 1-10
  - 1.5.1. Airfield 1-14
  - 1.5.2. Aircraft Operations 1-14
  - 1.5.3. Hangars 1-14
  - 1.5.4. Administration/Air Traffic Control Building 1-15
  - 1.5.5. Weather Service 1-15
  - 1.5.6. Navigation Aids 1-15
  - 1.5.7. Fuel Storage 1-15
- 1.6. Surrounding Uses 1-16
- 1.7. Land Ownership 1-16

2. PROPOSED ACTION 2-1
- 2.1. Project Description 2-1
- 2.2. Purpose and Need 2-2
- 2.3. Development Schedule 2-3
- 2.4. Project Costs 2-3

3. DESCRIPTION OF EXISTING ENVIRONMENT, IMPACTS, AND MITIGATION MEASURES 3-1
- 3.1. Climate & Climate Change 3-1
- 3.2. Physical Environment 3-2
  - 3.2.1. Geology and Topography and Soils 3-2
- 3.3. Hydrology 3-6
  - 3.3.1. Surface Waters, Coastal Waters, and Groundwater 3-6
- 3.4. Natural Hazards 3-9
  - 3.4.1. Sea Level Rise 3-9
  - 3.4.2. Flood and Tsunami Hazard 3-10
  - 3.4.3. Hurricane and Wind Hazard 3-14
  - 3.4.4. Seismic Hazard 3-15
- 3.5. Natural Environment 3-15
  - 3.5.1. Flora and Fauna 3-15
- 3.6. Historic, Archaeological and Cultural Resources 3-17

TABLE OF CONTENTS (Continued)

Page

3.7. Air Quality 3-19
3.8. Noise 3-20
3.9. Hazardous Materials 3-22
3.10. Traffic 3-23
3.11. Visual Resources 3-25
3.12. Socio-Economic Characteristics 3-25
3.13. Public Services and Facilities 3-27
3.13.1. Police, Fire, and Medical Services 3-27
3.13.2. Education 3-28
3.13.3. Recreational Facilities 3-29
3.13.4. Solid Waste Collection and Disposal 3-29
3.14. Infrastructure and Utilities 3-30
3.14.1. Water System 3-30
3.14.2. Wastewater System 3-30
3.14.3. Drainage System 3-31
3.14.4. Electrical and Communications System 3-34

4. RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS 4-1
4.1. State Land Use Plans and Policies 4-1
4.1.1. Hawaii State Plan 4-1
4.1.2. State Land Use District 4-2
4.1.3. State of Hawaii, Hawaii Community Development Authority Kalaeloa Master Plan 4-2
4.1.4. State of Hawaii, Department of Transportation, Airports Division, Kalaeloa Airport Master Plan 4-4
4.1.5. Airport Zoning Act 4-5
4.1.6. Hawaii Coastal Zone Management Program 4-5
4.2 City and County of Honolulu Land Use Plans and Policies 4-5
4.2.1. City and County of Honolulu General Plan 4-5
4.2.2. Ewa Development Plan 4-7
4.2.3. City and County of Honolulu Land Use Ordinance 4-7
4.2.4. City and County of Honolulu Special Management Area 4-8
4.3. Required Permits and Approvals 4-8

5. ALTERNATIVES 5-1
5.1. No Action Alternative 5-1
5.2. Alternative Design Schemes 5-1

6. DETERMINATION OF FONSI 6-1

7. CONSULTATION 7-1
7.1. EA Early Consultation 7-1
7.2. Draft Environmental Assessment Consultation 7-2

TABLE OF CONTENTS (Continued)

Page

7.3 Neighborhood Board Meeting 7-4

8. REFERENCES 8-1

LIST OF FIGURES

Page

Figure 1-1 Project Location Map 1-2
Figure 1-2 TMK Plat Map 1-4
Figure 1-3 Special Management Area Map 1-5
Figure 1-4 State Land Use District Map 1-6
Figure 1-5 City and County of Honolulu Zoning Map 1-7
Figure 1-6 Kalaeloa Community Development District Map 1-8
Figure 1-7A Airport Layout Plan – Layout Drawing 1-11
Figure 1-7B Airport Layout Plan – Airspace Plan 1-12
Figure 1-7C Airport Layout Plan – Inner Approach Surface Drawing 1-13
Figure 1-8 Surrounding Uses Map 1-17

Figure 2-1 Fixed Base Operation (FBO) Site Plan 2-5
Figure 2-2 Fuel Farm Facility Site Plan 2-6

Figure 3-1 USGS Topographic Map 3-3
Figure 3-2 Soils Map 3-5
Figure 3-3 Coastal Waters Map 3-7
Figure 3-4 Sea Level Rise Exposure Map 3-11
Figure 3-5 Flood Insurance Rate Map 3-12
Figure 3-6 Tsunami Hazard Map 3-13
Figure 3-7 Noise Contour Map 3-21

Figure 4-1 State Land Use District Map 4-3
Figure 4-2 City and County of Honolulu Zoning Map 4-10
Figure 4-3 Special Management Area Map 4-11

LIST OF APPENDICES

Appendix A Early Consultation Comments and Responses
Appendix B Draft Environmental Assessment Consultation Comments and Responses

LIST OF ACRONYMS USED

The following is a list of acronyms and abbreviations used in this Environmental Assessment (EA).

ASOS	Automated Surface Observing System
BMP	Best Management Practices
BPNAS	Barbers Point Naval Air Station
CCH	City and County of Honolulu
CFR	Code of Federal Regulations
CLEAN	Comprehensive Long-Term Environmental Action Navy
CO	Carbon Monoxide
CR	Coral outcrop
CY	Calendar Year
CZM	Coastal Management Zone
dBA	A-weighted Decibels
DBA	Doing business as
DEA	Draft Environmental Assessment
DNL	Day-Night Average Sound Level
DOE	State of Hawaii Department of Education
DOH	State of Hawaii Department of Health
DOI	U.S. Department of the Interior
DP	Development Plan
DPP	City and County of Honolulu Department of Permitting and Planning
DPR	City and County of Honolulu Department of Parks and Recreation
EA	Environmental Assessment
EIS	Environmental Impact Statement
ENV	City and County of Honolulu Department of Environmental Services
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FBI	Federal Bureau of Investigation
FBO	Fixed Base Operator
FEA	Final Environmental Assessment
FEIS	Final Environmental Impact Statement
FIRM	Flood Rate Insurance Map
FONSI	Finding of No Significant Impact
GA	General Aviation
GHG	Greenhouse Gas Emissions
H_2S	Hydrogen Sulfide
HAR	Hawaii Administrative Rules
HCDA	Hawaii Community Development Authority
HDOT	State of Hawaii Department of Transportation
HDOT-A	State of Hawaii Department of Transportation-Airports Division
HECO	Hawaiian Electrical Company

HEPA	Hawaii Environmental Policy Act
HFD	Honolulu Fire Department
HIRL	High Intensity Runway Lights
HNG	Hawaii National Guard
HNL	Daniel K. Inouye International Airport
HPD	Honolulu Police Department
HRS	Hawaii Revised Statutes
IBC	International Building Code
INM	Integrated Noise Model
IPCC	Intergovernmental Panel on Climate Change
JRF	Kalaeloa Airport
KCDD	Kalaeloa Community Development District
LUO	Land Use Ordinance
MCAS	Marine Corps Air Station
mgd	Million Gallons Per Day
MS4	System of Conveyances that discharges to Waters of U.S.
NAAQS	National Ambient Air Quality Standards
NATA	National Air Transportation Association
NDB	Nondirectional beacon
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPV	Net Present Value
NOAA	National Oceanic and Atmosphere Administration
NO_2	Nitrogen Dioxide
NRHP	National Register of Historic Places
O_3	Ozone
PAR	Precision approach radar
Pb	Lead
PCB	Polychlorinated biphenylsPM$_{10}$ &PM$_2$ Particulate Matter
POIs	Points of Interest
ROH	Revised Ordinances of Honolulu
SF	Square feet
SHPD	State Historic Preservation Division
SIC	Standard Industrial Classifications
SLR-XA	Sea level rise exposure area
SMA	Special Management Area
SMP	Special Management Area Use Permit
SO_2	Sulfur Dioxide
SPCC	Spill Prevention, Control, and Countermeasure
TACAN	Tactical air navigational
TMK	Tax Map Keys
TSA	Transportation Security Administration
UBC	Uniform Building Code
UH	University of Hawaii

UIC	Underground Injection Control
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WHA	Wildlife Hazards Assessment
WWTP	Wastewater Treatment Plant

PREFACE

This Final Environmental Assessment – Finding of No Significant Impact (FEA-FONSI) has been prepared pursuant to Chapter 343, Hawaii Revised Statutes (HRS), and Title 11, Chapter 200.1, Hawaii Administrative Rules (HAR), Department of Health, State of Hawaii.

As prescribed by HRS §343-5(c) and HAR §11-200.1-9, this Environmental Assessment (EA) is required because the proposed "Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility" project, herein referred to as the "proposed action", constitutes an "Applicant Action" involving the use of State lands by the applicant. The "Applicant" is Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu, and the "Approving Agency" is the State of Hawaii, Department of Transportation, Airports Division (HDOT-A). HDOT-A is responsible for determining the significance of potential environmental impacts.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA, pursuant to the Hawaii Environmental Policy Act (HEPA). On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this Final EA.

Upon further review of the project details, however, HDOT-A determined, through its judgment and experience, that the project was not eligible for an exemption and required the Applicant to prepare this EA. Furthermore, HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA, pursuant to HAR §11-200.1-18(a). Publication of a Draft EA initiated a 30-day public review period. All written comments received during this period and responses to those comments are appended to this Final EA. HDOT-A has seen all the comments and responses and has made a Finding of No Significant Impact (FONSI) determination for the proposed action.

Approximately 26.4-acres at the southern end of Kalaeloa Airport is located within the City and County of Honolulu Special Management Area (SMA). The project site is not located within the SMA. Consequently, an SMA Use Permit (SMP) will not be required for the construction of the proposed action.

No federal funding is proposed to be used for the proposed action. However, pursuant to Section 163 of the Federal Aviation Administration (FAA) Reauthorization Act of 2018, the FAA may determine project components could be subject to federal environmental review requirements under the National Environmental Policy Act (NEPA). Additionally, consultation with resource agencies may be required to support the environmental review process and may include, but is not limited to, Section 106 of the National Historic Preservation Act (NHPA) and Section 7 of the Endangered Species Act (ESA). Should federal environmental review be required, it will be undertaken by the FAA under a separate process. It is anticipated that the project will have no adverse effects on historic properties or endangered species.

(This page intentionally left blank)

SUMMARY

Project Name:	Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Project Applicant:	Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Approving Agency:	State of Hawaii, Department of Transportation, Airports Division (HDOT-A)
Location:	Kalaeloa Airport (JRF), Kalaeloa, Oahu, Hawaii
Tax Map Keys (TMKs):	(1) 9-1-013:032 (por.) and 076 (por.)
Recorded Fee Owner:	HDOT-A
Existing Use:	The proposed Fixed-Base Operation (FBO) site is located on a pre-disturbed developed area, while the proposed Fuel Farm Facility site is situated on a previously disturbed and assessed area within the JRF site. The existing JRF Airport Layout Plan outlines that the FBO and Fuel Farm sites are designated for General Aviation (GA) use. The proposed action is consistent with the designated use.
Land Use Classification:	Urban
Flood Zone:	Zone D
Airport Zoning:	The entire project site is in the Airports horizontal zone, pursuant to Hawaii Administrative Rules, §19-12-4 and §19-12-5, as authorized by Hawaii Revised Statutes, Chapter 262-3, the Airport Zoning Act. All HDOT-A lessees at JRF support the State of Hawaii airports system.
Special Management Area:	An approximately 26.4-acre portion of the southern end of JRF is located within the City and County of Honolulu Special Management Area (SMA). The project site is not located within the SMA. Consequently, an SMA Use Permit (SMP) will not be required for the construction of the proposed action.
County Zoning Designation:	City and County of Honolulu Department of Planning and Permitting (DPP) zoning data indicates that the project site lies within the Military and Federal District (F-1), under the jurisdiction of the

State's Hawaii Community Development Authority (HCDA) within its Kalaeloa Community Development District (KCDD).

Proposed Action:

Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu, herein referred to as the "Applicant", proposes to construct a Fixed Base Operation (FBO) and Fuel Farm Facility on adjacent sites at JRF. The term FBO refers to a commercial enterprise that has been granted the right by an airport authority to operate on that airport and provide aviation services, such as fuel, parking and hangar space, to the GA community.

The proposed FBO is envisioned as a pre-engineered metal and glass building measuring approximately 50 feet high, 310 feet long, and 140 feet wide. An associated parking area with approximately 100 stalls will also be provided. Within the building, there will be approximately 40,000 Square Feet (SF) of programmable space for GA use. Conceptually, the proposed program may consist of approximately 30,000 SF for a GA aircraft hangar; approximately 8,000 SF for a two-story office area that may include uses such as an executive airport terminal/lobby, conference room, pilot lounge and theater rooms, quiet rooms, café/refreshment area, and associated offices spaces; and approximately 2,000 SF for a ground service maintenance area intended as an equipment storage and service area for all vehicles servicing the air operations of the FBO. A hangar door approximately 150 feet wide by 28 feet high on the ramp side of the facility will provide runway access to GA aircraft and service vehicles.

The proposed Fuel Farm Facility is anticipated to encompass up to eight (8) 30,000-gallon Jet A Fuel above-ground, horizontal storage tanks with associated access stairs and catwalks. The total potential gross storage capacity of this Fuel Farm Facility is projected to amount to 240,000 gallons. In addition, two (2) Jet A Fuel offloading skids are proposed. These skids will include a pump, filtration elements, relaxation chamber, flow meter, control valve, and an offloading hose. Also proposed is one (1) 15,000-gallon Aviation gas (Avgas) tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon tanks used by various motor vehicles (mogas). The Avgas, diesel, and mogas tanks will each have offloading and loading capabilities. A sized concrete containment area will be built for all the storage tanks and includes access stairs, containment drains, and an intermediate diked wall. A circular vehicle drive path will be used for access around the tank containment area. For drainage, a stormwater system for non-contact and contact water, including collection and infiltration will be installed. For safety reasons, an 8-foot-tall security fence will be

installed around the lease lot line with a sliding entrance gate for access.

Impacts: Short-term construction-related impacts will be fugitive dust, noise, and construction-related traffic. In the long-term, noise from aircraft operations will not change or affect sensitive land uses outside JRF boundaries. The project site will not extend into the areas occupied by former U.S. Navy structures that are eligible for listing on the National Register of Historic Places.

Determination: Finding of No Significant Impact (FONSI)

Early Consultation: Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this Final EA.

Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project was not eligible for an exemption and required the Applicant to prepare this EA. Furthermore, HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a).

Parties Consulted During Early Consultation:

Federal Agencies

Federal Aviation Administration – Honolulu Airports District Office
U.S. Environmental Protection Agency
U.S. Army Corps of Engineers
U.S. Coast Guard – Air Station Barbers Point
U.S. Department of Homeland Security, TSA Pacific Airports Coordination Center
U.S. Department of the Interior, Fish and Wildlife Service

State Agencies

Department of Accounting and General Services
Department of Agriculture
Department of Business, Economic Development and Tourism
Department of Business, Economic Development and Tourism, Office of Planning
Department of Defense

Department of Defense, Hawaii Army National Guard
Department of Health
Department of Land and Natural Resources
Office of Hawaiian Affairs

City and County of Honolulu Agencies
Board of Water Supply
Department of Community Services
Department of Design and Construction
Department of Environmental Services
Department of Parks and Recreation
Department of Planning and Permitting
Department of Transportation Services
Honolulu Fire Department
Honolulu Police Department

Elected Officials
U.S. Senator Brian E. Schatz
U.S. Congressman Ed Case
State Senator Mike Gabbard
State Representative Sharon E. Har
City Councilmember Kymberly Marcos Pine

Utility Companies
Hawaiian Electric Company

Other Interested Parties and Individuals
Chairperson Jack Legal, Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34
Chairperson John Whalen, Hawaii Community Development Authority
Air Cargo Association of Hawaii
General Aviation Council of Hawaii
Hawaii Army National Guard
Hunt Companies

Draft Environmental Assessment Written Comments:

Federal Agencies
Federal Aviation Administration – Honolulu Airports District Office
U.S. Department of the Interior, Fish and Wildlife Service

State Agencies
Department of Accounting and General Services
Department of Land and Natural Resources
Office of Hawaiian Affairs

City and County of Honolulu Agencies

Department of Design and Construction
Department of Facility Maintenance
Department of Planning and Permitting
Honolulu Fire Department
Honolulu Police Department

Utility Companies
Board of Water Supply
Hawaii Gas

Other Interested Parties and Individuals
Alicia Campbell
Amelia Anderson
American Renaissance Academy
Amy Raymond
Anuhea Perry
Bill van den Hurk
Brad Hayes
Brian Walker
Christine Casison
Colby Jones
Colleen Aiwohi
Don Cridlebaugh
Donna Sanchez
Duane Eldredge
Elaine Balthazar-Chang
Eugene Chong
Ford Matsunaga
Frederick Turshman
Hiiaka Jardine
Jacob Sills
Jacob Straube
Jaris Flora
John Bond
John Sanchez
Jon Perry
Kailee Chang
Kaleo Kamaka
Kathleen Popa
Kealoha Chang
Keola Firmin
Keone Kaleikula-Kele
Lea Ann Kakimoto
Leahi Ma
Mahina Silva
Malisa Kaleikula-Kele

Marleen Serrao
Melvin Andres
Micah Sanchez
Michael Hruby, Five Star
Michael Silva
Michelle Perry
Nainoa Hopkins
Nomen Nescio
Paul Anderson
Princess Ynoba
Regi Perry
Sharon Miller
Vincent Perry
Various Anonymous Individuals

CHAPTER 1: INTRODUCTION

1. INTRODUCTION

1.1. Background

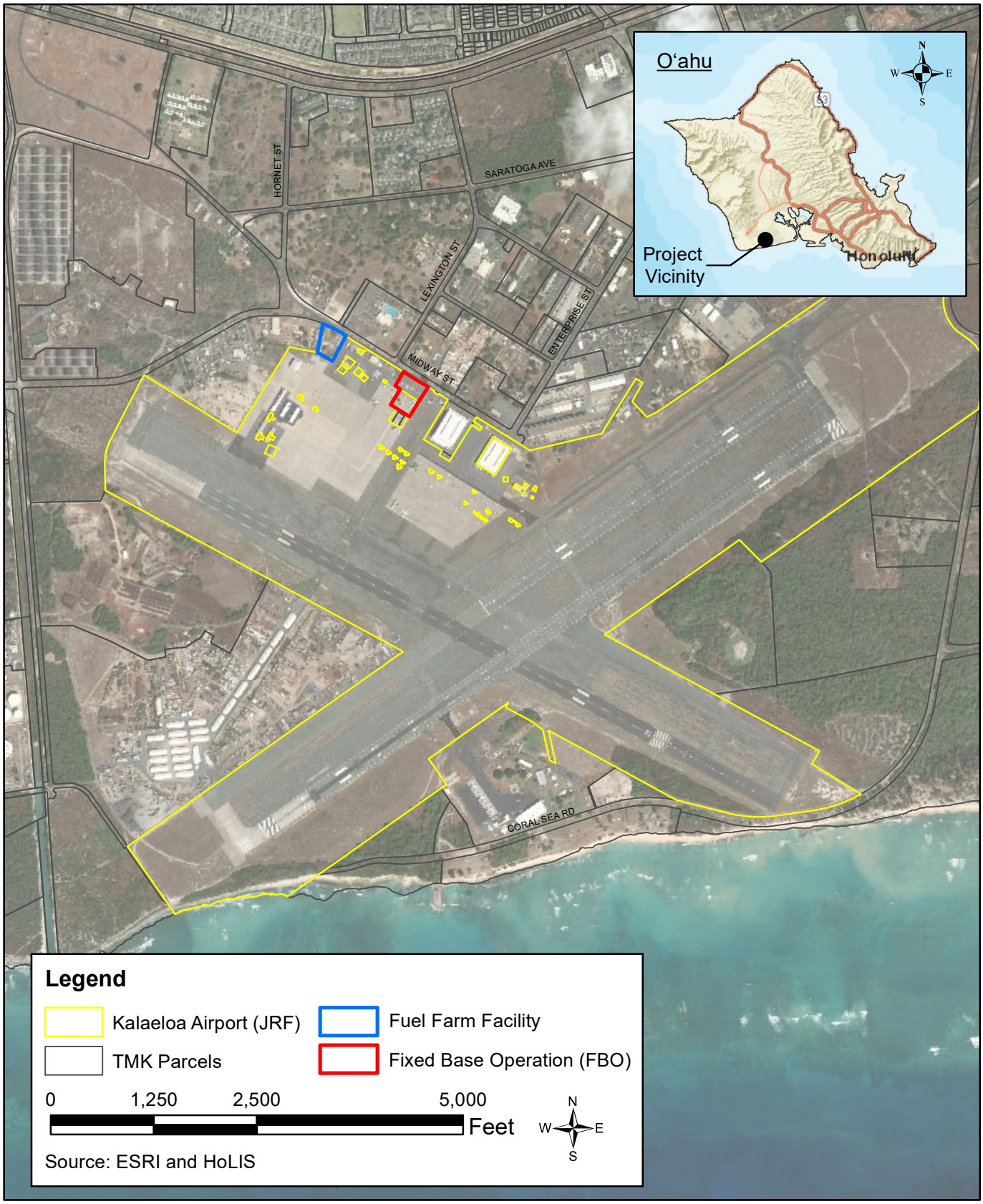
Kalaeloa Airport (JRF) was constructed in 1942, in the midst of World War II and occupies an area of approximately 752.240 acres in the central portion of the former Barbers Point Naval Air Station (BPNAS) on the southwest coast of the Island of Oahu along the Ewa Plain and south of the Waianae Mountains (See Figure 1-1: Project Location Map). JRF has been conveyed to the State of Hawaii, Department of Transportation (HDOT), under a public benefit conveyance by the U.S. Navy, and encompasses airport/aviation support facilities, including three runways (two parallel runways and one crosswind) and the air traffic control tower, of the former BPNAS.

As a result of the 1993 Base Closure and Realignment Commission recommendation, BPNAS was to be closed on July 1, 1999. At the time of closure, BPNAS occupied 3,833 acres, which included 110 acres of non-contiguous lands at Kaula Island and Iroquois Point. Of the 3,833 acres, approximately 1,238 acres were retained by the U.S. Navy, including all the non-contiguous areas, approximately 1 acre was transferred to the West Oahu Community Credit Union, and 457 acres were transferred to other Federal agencies. Thus, about 2,137 acres of the BPNAS were declared surplus (land not being retained by the U.S. Navy or other federal agencies).

On October 8, 1996, the Barbers Point Redevelopment Commission adopted a final land use plan for the redevelopment of BPNAS which is described in the March 1997 Community Redevelopment Plan report. The Community Redevelopment Plan recommended use of a portion of the BPNAS for a general aviation reliever airport, aviation training, and an aviation component of the City's Life Safety Academy. The Plan for the airport continued to accommodate the requirements of the commercial airlines and military for an alternate landing site designation as well as use by the U.S. Coast Guard (USCG) and the Hawaii National Guard (HNG).

The State of Hawaii, Department of Transportation, Airport Division (HDOT-A), requested that the Redevelopment Commission recommends transfer of a portion of the BPNAS to the HDOT-A for use as a reliever airport, consistent with the Community Redevelopment Plan. The HDOT-A filed a formal application with the U.S. Navy for a public airport conveyance to use JRF as a general aviation reliever airport. The Federal Aviation Administration (FAA) was the sponsor for disposal of BPNAS as a public airport, in accordance with 49 U.S.C. 47151.

In 2002, the Hawaii Community Development Authority (HCDA) took responsibility from the Barbers Point Redevelopment Commission for development of the former BPNAS. HCDA prepared a new Kalaeloa Master Plan which was updated in 2006 to guide the future redevelopment of Kalaeloa. HDOT-A did not agree with a portion of the HCDA Master Plan which included the extension of Runway 4R to 11,000 feet to accommodate cargo aircraft at full



WILSON OKAMOTO CORPORATION

FIGURE 1-1

Project Location Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

fuel loadings. The HDOT-A opposed the runway extension as it would have required the relocation of Coral Sea Road which, in 1997, the HDOT-A had promised the communities would not be undertaken.

1.2. Project Location

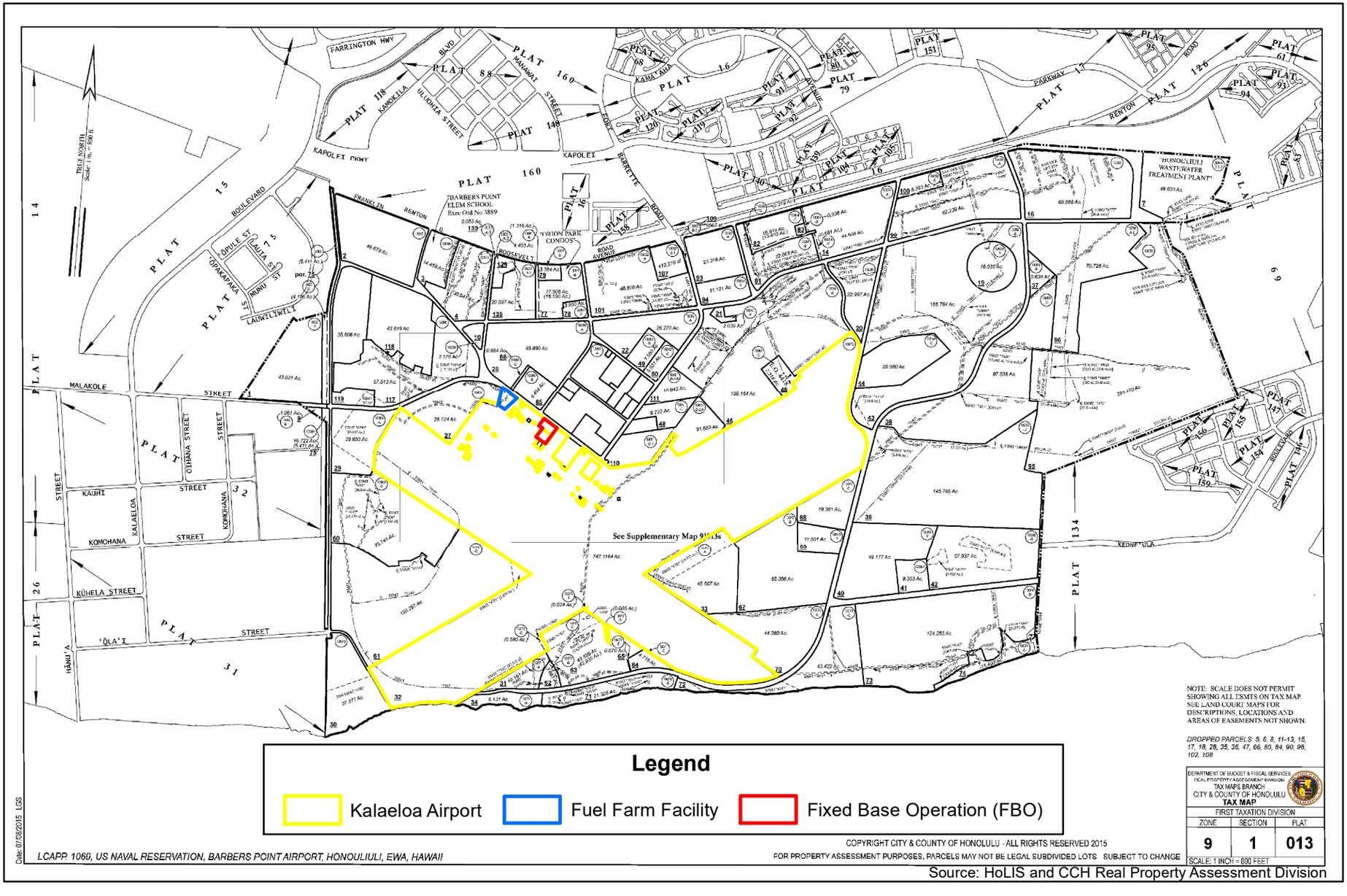
JRF is located on the southwest coast of Oahu along the Ewa Plain and south of the Waianae Mountains, 8 nautical miles west of Daniel K. Inouye International Airport (HNL), and about 20 miles west of the center of the City of Honolulu. Accordingly, JRF is part of the Daniel K. Inouye International Airport (HNL) and JRF air transportation corridor. The reference point elevation at JRF is 33 feet mean sea level.

JRF and surrounding area are in the Airport Zone as authorized by the Airport Zoning Act, HRS, §262-3, and defined by HAR, §§19-12-4, 5 and 6.

The project site is comprised of two (2) adjacent lots that encompass a total area of approximately 263,589 square feet (SF), or 6.05 acres, identified as a portion of Tax Map Keys (TMKs): (1) 9-1-013: 032 and 076 on the grounds of JRF (See Figure 1-2: TMK Plat Map). The Fixed Base Operation (FBO) encompasses approximately 180,774 SF, or 4.15 acres, of disturbed land generally bounded by Midway Street to the north, JRF boundary to the west, Taxiway C to the south, and Taxiway C-2 to the east. It is currently developed with the concrete aircraft parking apron constructed by the U.S. Navy. According to previous geotechnical studies, the entire FBO site is covered with about 7 to 11 inches of concrete pavement. The Fuel Farm Facility site encompasses 82,815 SF, or 1.90 acres of disturbed vacant land that was used by the military and evaluated in past environmental studies, and is located directly south of the T-intersection of Midway Street and Franklin Avenue. The Fuel Farm Facility site is located approximately 630 feet west of the proposed FBO site. Both sites together are referred to collectively as the project site. Although the project site appears to be relatively flat, the topographic survey shows the project site is sloped towards the intersection of Taxiway C and Taxiway C-2, or to the southeast. Runway 11-29 lies to the south of the Taxiway C.

An approximately 26.4-acre portion of the southern end of JRF is located within the City and County of Honolulu Special Management Area (SMA) (See Figure 1-3: Special Management Area Map). The project site is not located within the SMA. Consequently, an SMA Use Permit (SMP) will be not required for the construction of the proposed action.

JRF is located in the State Urban Land Use District (See Figure 1-4: State Land Use District Map). According to the City and County of Honolulu Department of Planning and Permitting (DPP), the project site was zoned within the Military and Federal District (F-1) and was transferred to the HCDA who has zoning and land use jurisdiction over this project. The project site is within the HCDA's Kalaeloa Community Development District (KCDD) (See Figure 1-5: City and County of Honolulu Zoning Map, and Figure 1-6: Kalaeloa Community Development District Map).



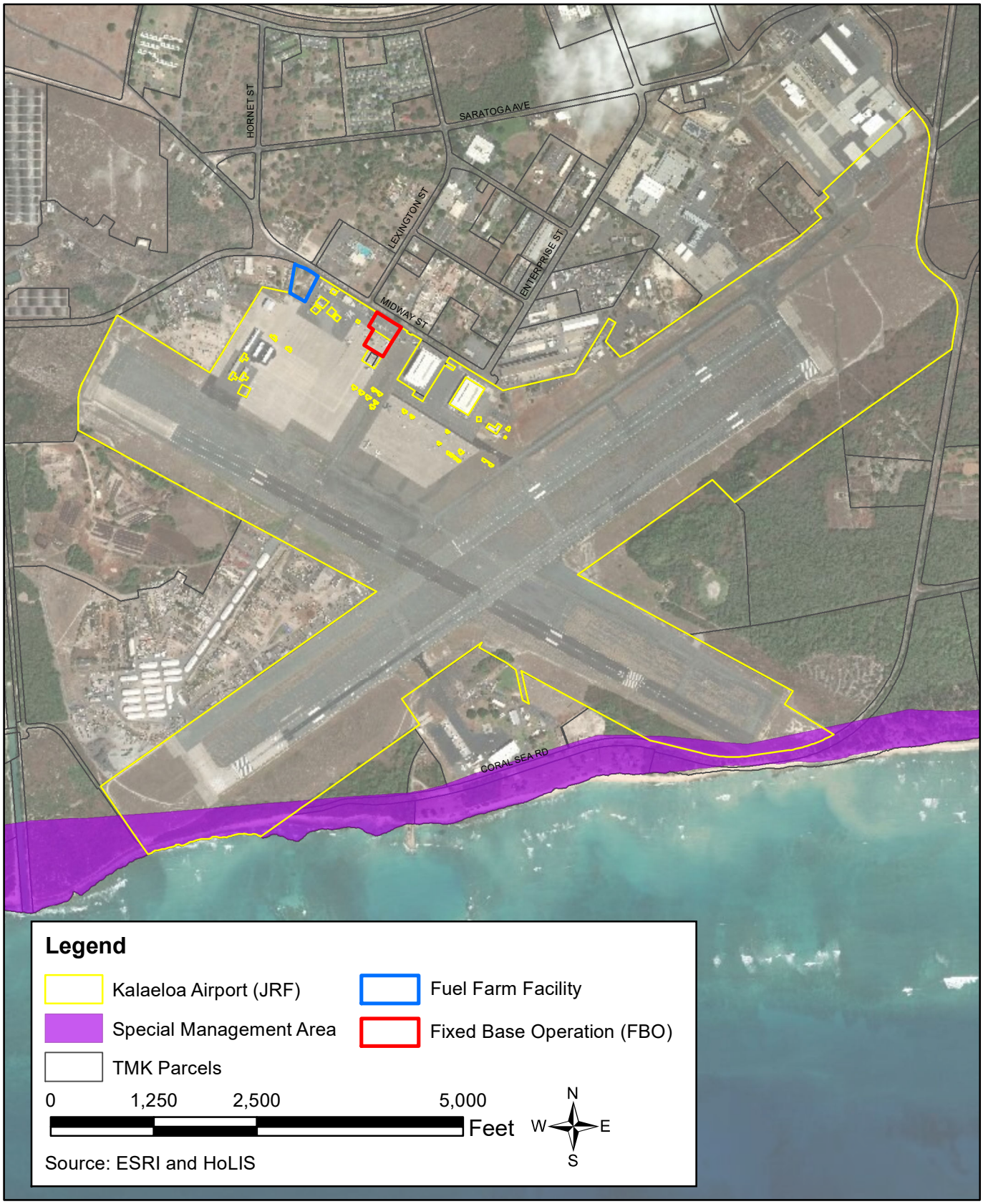
Source: HoLIS and CCH Real Property Assessment Division

WILSON OKAMOTO CORPORATION

FIGURE 1-2

TMK Plat Map

Million Air - Kalaeloa Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

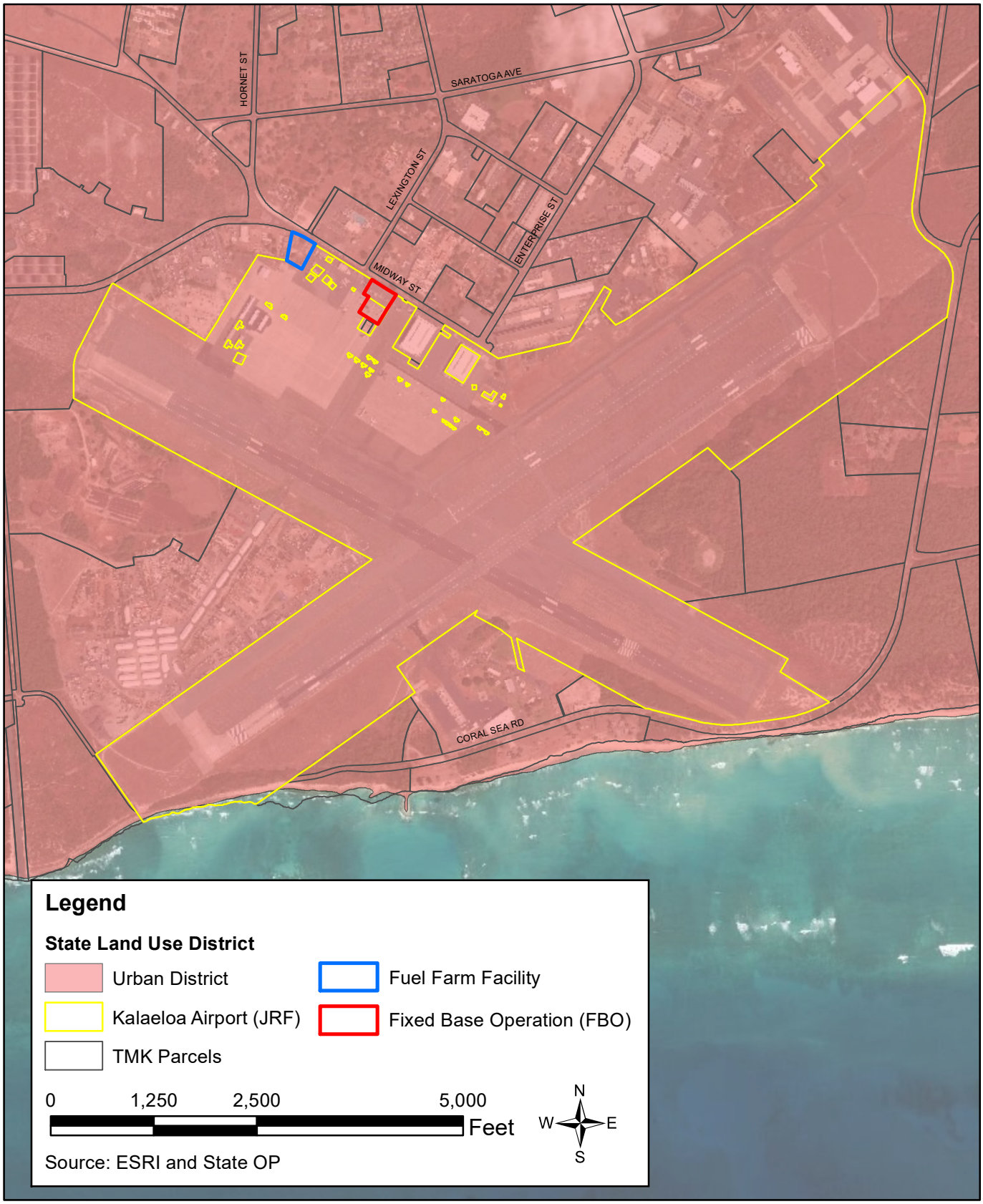


WILSON OKAMOTO CORPORATION

FIGURE 1-3

Special Management Area Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

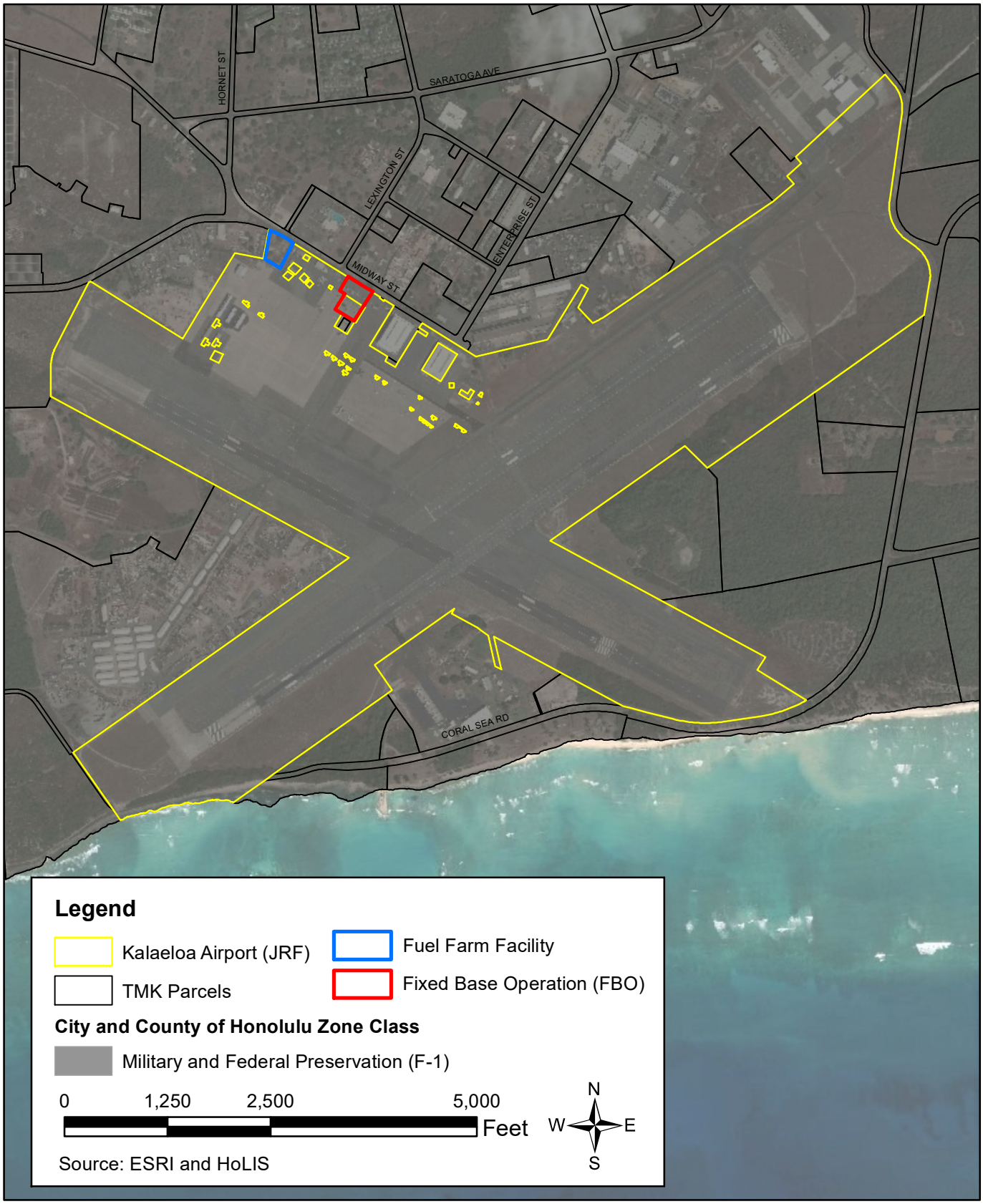


WILSON OKAMOTO CORPORATION

FIGURE 1-4

State Land Use District Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii



WILSON OKAMOTO CORPORATION

FIGURE 1-5

City and County of Honolulu Zoning Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

Fuel Farm Facility

Fixed Base Operation (FBO)

NAVY PROPERTY AS OF MARCH 2013

- NAVY OWNERSHIP
- TO DISPOSE
- CITY PARK PENDING TRANSFER
- WASTEWATER PENDING TRANSFER
- HUNT DEVELOPMENT GROUP (LEASE OR SALE)
- HAWAII COMMUNITY DEVELOPMENT AUTHORITY PENDING TRANSFER

NON-NAVY PROPERTY

- AIRPORT
- BOARD OF WATER SUPPLY
- RP KALAELOA LANDOWNERS LLC
- CITY ROAD
- COAST GUARD
- DEPARTMENT OF HAWAIIAN HOME LANDS
- CAMPBELL DITCH
- FEDERAL AVIATION ADMINISTRATION
- FORD ISLAND HOUSING (HUNT)
- HAWAII AIR NATIONAL GUARD / US ARMY
- DEPARTMENT OF HUMAN SERVICES
- DEPARTMENT OF EDUCATION, BARBERS POINT ELEMENTARY
- STATE ROAD
- HAWAII COMMUNITY DEVELOPMENT AUTHORITY (HCDA)
- US FISH AND WILDLIFE SERVICE
- US POSTAL SERVICE
- VETERANS ADMINISTRATION
- EAGLE RIVER INVESTORS HAWAII LLC

PEND PENDING CONVEYANCE

Source: HCDA, Kalaeloa Master Plan (2006)

500 250 0 500 1,000 1,500 2,000 2,500 Feet

GRAPHIC SCALE

N W E S

REGIONAL BASE MAP MAINTENANCE BY NAVFAC HAWAII. SUBMIT UPDATES TO OP3 ENGINEERING SYSTEMS (808) 471-4546. http://www.rsims.navy.mil

IF SHEET IS LESS THAN 36" X 48" IT IS A REDUCED PRINT AND THE SCALE IS REDUCED ACCORDINGLY.

SIZE E

NAVFAC DRAWING NO

Plot Date: MARCH 14, 2006

FIGURE 1-6
Kalaeloa Community Development District Map

1.3. JRF History

Aviation activity at Barbers Point began in the 1930's with the construction of a Navy Mooring Mast for the anticipated use of the Dirigibles Acron and Macon. Following this, a small turf airstrip was built nearby and the Ewa Marine Corps Air Station (MCAS) evolved at the site up until 1940. Work on BPNAS began in November 1941. However, men and equipment were temporarily diverted to the construction of the interim airfield when it was decided that the airfield would be dedicated as Marine Corps Air Station (MCAS) Ewa. MCAS Ewa was completed in 1942.

As crews completed the work at MCAS Ewa, they were immediately transferred to the BPNAS project. BPNAS was originally laid out with four runways forming an "X' or modified radial layout. These runways were to be 500 feet wide with lengths varying from 3,400 to 4,800 feet. With this radial arrangement of the runways, control of flight operations was facilitated and the necessity for long taxiways was obviated with the resultant greater operational traffic capacity.

“Kalaeloa Airport” has since been designated as John Rodgers Field, or JRF, in honor of Commander John Rodgers who had been Commanding Officer of the Naval Air Station at Pearl Harbor between 1923 and 1925. On August 31, 1925, Commander John Rodgers and his crew left San Francisco in Navy PN-9 No. 1 to historically attempt the first flight across the Pacific Ocean from the Mainland U.S. to Hawaii. The plane was forced to land in the ocean on September 1, 1925 after running out of fuel about 365 miles from Oahu. The crew flew 1,841.12 statute miles which was accepted as a new world record for Class C seaplanes that remained unbeaten for almost five years.

In 1974, while JRF was under control of the U.S. Navy at BPNAS, a plaque was placed by the U.S. Navy outside of the existing air traffic control tower (Building 4) designating the airfield as John Rodgers Field.

1.4. Previous Environmental Documentation at JRF

On June 17, 1999, the Department of the Navy, Pacific Division, Naval Facilities Engineering Command issued a Record of Decision for the disposal and reuse of BPNAS. The Record of Decision provides the U.S. Navy’s decision regarding the proposed action and alternatives evaluated in the *Final Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station Barbers Point*, which was published in February 1999.

The U.S. Navy’s Final EIS (FEIS) of February 1999 evaluated four reuse alternatives, each emphasizing various types of development, including residential, light industrial, recreation, and commercial. The alternatives were identified by the Local Redevelopment Authority (LRA) – Barbers Point Naval Air Station Redevelopment Commission, and listed in the Naval Air Station Barbers Point, Community Redevelopment Plan and Naval Air Station Barbers Point, Community Redevelopment Plan, Amendment I; one of which the State preferred. Three of the alternatives, including the plan approved by the Barbers Point Redevelopment Commission and signed by the Governor, included a general aviation reliever airport. A fifth alternative, No Action, assumed the existing airfield would not be used and, along with other surplus land, would be retained by the U.S. Navy in caretaker status.

The State-preferred alternative, which was also the Navy's preferred alternative, as discussed in the FEIS, proposed dividing the BPNAS property into mixed land uses. The largest land component of the preferred alternative was the airport, which consists of a general aviation reliever airport and the University of Hawaii Aviation Training Center located in Hangar 111. In the 1999 Final EIS, the proposed airport consisted of two parallel runways (Runway 4L-22R and Runway 4R-22L) and a crosswind runway (Runway 11-29), the existing air traffic control tower, and related land uses surrounding the runways. The U.S. Coast Guard would remain in its existing facilities adjacent to and south of Runway 4R-22L and would not be included in the HDOT-A property. The Hawaii National Guard would be located adjacent to the airport and north of Runway 22R and would also not be included in the HDOT-A property. Thus, the U.S. Navy's FEIS discussed the existing conditions and environmental impacts to the area now designated as JRF.

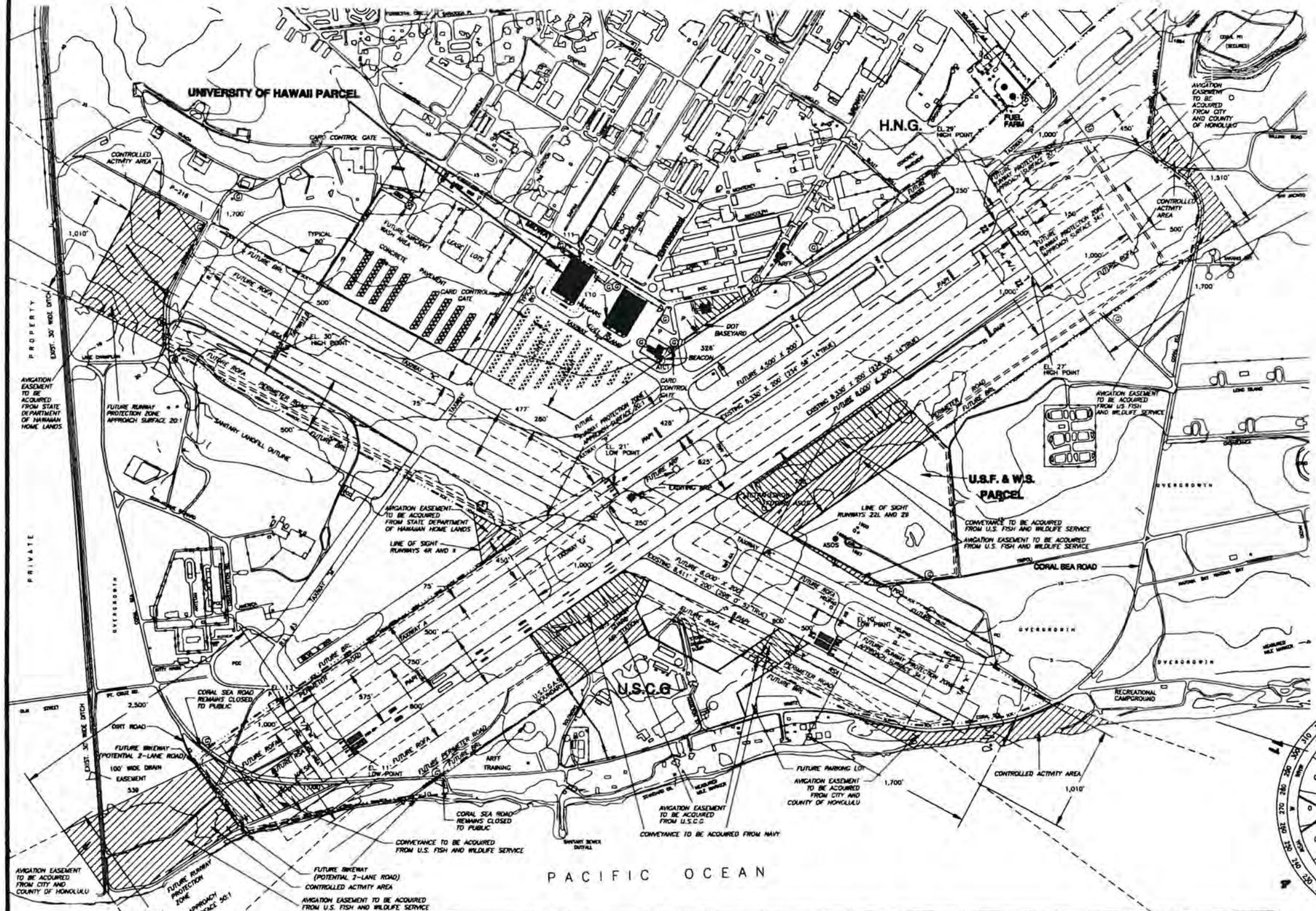
The FEIS stated that the airport, in the State-preferred alternative would solve the problem of an unsatisfactory mix of small, light general aviation and large, heavy air carrier aircraft operations at HNL. JRF would serve about 60 percent of the small single-engine and light twin-engine propeller aircraft forecasted to be based at HNL by the year 2020, and would serve about 50 percent of the general aviation aircraft projected to be based at Dillingham Airfield (HDH), also known as Kawaihapai Airport.[1] Accordingly, the FEIS projected that approximately 105,900 annual general aviation aircraft operations from HNL and HDH could be served by JRF by the year 2020. The HDOT-A plan to terminate the HDH lease on June 30, 2021 may increase GA activity at JRF. However, this activity is not anticipated to be a significant increase over the aviation activity associated with the use of the site for the former BPNAS.

In 2010, an Environmental Assessment (EA) for the *Kalaeloa Airport Development* was prepared to assess the impacts of the construction of eight (8) banks of T-hangars for 144 general aviation aircraft and the development of eight (8) lease lots and related access roads for use by lessees on about 54.37 acres on the previously cleared and paved portion of the airport that was used by the U.S. Navy as an aircraft parking apron. This EA was processed as a Final EA – Finding of No Significant Impact (FEA-FONSI) by the HDOT-A.

1.5. JRF Master Plan

In November 1998, in anticipation of the closing of the BPNAS, the HDOT-A prepared the Kalaeloa Airport Master Plan and addressed the significant environmental impacts of the Master Plan, including those related to the noise impacts from uses of the airfield set forth in the Master Plan. The Master Plan provides development guidance on airport lands and is subject to change as needs and projection forecasts evolve. The Master Plan also serves as a tool to support HDOT-A's mission, goals, and objectives. The airfield was never out of service during the transition from U.S. Navy to State ownership and, on July 1, 1999, JRF was opened as a HDOT-A facility. The following sections provide an overview description of the airfield related facilities at JRF (See Figures 1-7A: Airport Layout Plan – Layout Drawing, 1-7B: Airport Layout Plan – Airspace Plan, and 1-7C: Airport Layout Plan – Inner Approach Surface Drawing).

[1] HDH is owned by the U.S. Army and is leased to HDOT-A for general aviation use. HDOT-A plans to terminate the HDH lease with the U.S. military on June 30, 2021.



NOTE

THIS DRAWING IS FOR PLANNING PURPOSES ONLY AND IS NOT INTENDED FOR CONSTRUCTION OR NAVIGATIONAL PURPOSES.

THE PREPARATION OF THIS DOCUMENT WAS FINANCED IN PART THROUGH A PLANNING GRANT FROM THE FEDERAL AVIATION ADMINISTRATION AS PROVIDED UNDER SECTION 505 OF THE AIRPORT AND AIRWAY IMPROVEMENT ACT OF 1982 AS AMENDED

EXISTING	ULTIMATE	
		STRUCTURE
		AIRFIELD/APRON PAVEMENT
		AIRPORT BOUNDARY
	FUTURE BRL	BUILDING RESTRICTION LINE
		FENCING
●	○	AIRPORT REFERENCE POINT
		THRESHOLD LIGHTS
		WIND SOCK
Ⓒ	Ⓒ	GATE
⛽	⛽	FUEL ISLAND
P	P	PARKING LOT

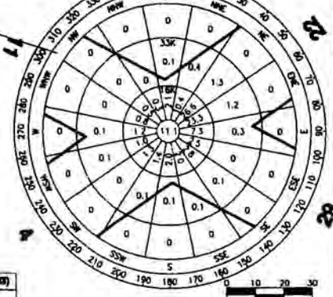
EXISTING	ULTIMATE	
		STRUCTURE TO BE REMOVED
		GROUND CONTOURS
		RUNWAY PROTECTION ZONE
		LAND CONVEYANCE
		AVIGATION EASEMENT
	RSA	RUNWAY SAFETY AREA
	ROFA	RUNWAY OBJECT FREE AREA
	T	T-HANGAR
	T	TIEDOWN
		PAPI
		SEGMENTED CIRCLE

AIRPORT DATA		EXISTING	ULTIMATE
AIRPORT ELEVATION (MSL) FEET		33'	30'
AIRPORT REFERENCE POINT (ARP) COORDINATES (NAD 83)	LATITUDE	21°18'24"N	21°18'25"N
	LONGITUDE	158°04'18"W	158°04'15"W
NORMAL MAX. TEMP. HOTTEST MONTH		88°F	SAME
AIRPORT AND TERMINAL NAVAIDS		TACAN-78, PAR-4 NDB	OPS, NDB
AIRPORT CATEGORY AND ROLE		MILITARY	RL/TR
ROTATING BEACON		YES	SAME
TAXIWAY LIGHTING		YES	SAME
TAXIWAY SIGN SYSTEM		YES	SAME
AIR TRAFFIC CONTROL TOWER		YES	SAME
RADAR APPROACH/DEPARTURE CONTROL		HONOLULU	SAME
LIGHTED TETRAHEDRON		YES	SAME
LIGHTED WIND CONE		YES	SAME
AIRPORT REFERENCE CODE		D-V	C-IV
AIRPORT PROPERTY (ACRES)		-	757

RUNWAY DATA		RUNWAY 4R–22L		RUNWAY 4L–22R		RUNWAY 11–29	
		EXISTING	ULTIMATE	EXISTING	ULTIMATE	EXISTING	ULTIMATE
EFFECTIVE GRADIENT (%)		0.19	0.20	0.19	0.18	0.29	0.33
WIND COVERAGE(16.5 KNOTS) ALL WEATHER(%)		99.55	SAME	99.55	SAME	98.35	SAME
INSTRUMENT RUNWAY		YES	SAME	YES	NO	YES	SAME
APPROACH SURFACES (FAR PART 77)		4R 50:1 22L 50:1	SAME 22L 34:1	4L 50:1 22R 50:1	4L 20:1 22R 20:1	11 50:1 29 50:1	11 20:1 29 34:1
NAVIGATIONAL AND VISUAL AIDS		4R ALS 22L NONE	4R MALSR PAPI 22L PAPI	4L NONE 22R NONE	4L PAPI 22R PAPI	11 NONE 29 NONE	SAME 29 PAPI
RUNWAY LIGHTING		HIRL	SAME	HIRL	MIRL	HIRL	SAME
RUNWAY MARKING		4R PIR 22L PIR	4R PRECISION 22L NONPRECISION	4L PIR 22R PIR	4L VISUAL 22R VISUAL	11 PIR 29 PIR	11 VISUAL 29 NONPRECISION
PAVEMENT STRENGTH (LBS)	SINGLE	74,000	SAME	74,000	SAME	74,000	SAME
	DUAL	167,000	SAME	167,000	SAME	167,000	SAME
	DUAL TANDEM	327,000	SAME	327,000	SAME	327,000	SAME
AIRCRAFT DESIGN GROUP		D-V	C-IV	D-V	B-II	D-V	C-IV
RUNWAY DIMENSIONS (FEET)		8,330'X200'	8,000'X200'	8,330'X200'	4,500'X200'	8,441'X200'	6,000'X200'
PAVEMENT SURFACE		PAVED	SAME	PAVED	SAME	PAVED	SAME

RUNWAY END COORDINATES (NAD 83)			
RUNWAY		EXISTING	ULTIMATE
4R	LATITUDE	21°17'59"N	21°18'01"N
	LONGITUDE	158°04'49"W	158°04'48"W
22L	LATITUDE	21°18'46"N	SAME
	LONGITUDE	158°03'38"W	
4L	LATITUDE	21°18'04"N	21°18'24"N
	LONGITUDE	158°04'52"W	158°04'18"W
22R	LATITUDE	21°18'50"N	SAME
	LONGITUDE	158°03'38"W	
11	LATITUDE	21°18'43"N	21°18'38"N
	LONGITUDE	158°05'02"W	158°04'53"W
29	LATITUDE	21°18'04"N	21°18'11"N
	LONGITUDE	158°03'44"W	158°03'57"W

NOTE
OBSTACLE FREE ZONE 400 FEET FOR LARGE AIRCRAFT



WIND COVERAGE	10.5 KNOTS	16.5 KNOTS
RUNWAY 4-22	97.80%	99.55%
RUNWAY 11-29	85.10%	98.35%
BOTH RUNWAYS	99.50%	99.80%
CALM AND LESS THAN 3 KNOTS = 11.1%		

ALL-WEATHER WIND ROSE
WEATHER DATA FROM BARBERS POINT WEATHER STATION, 1949–1990

Airports Division
DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII

KALAELOA AIRPORT MASTER PLAN

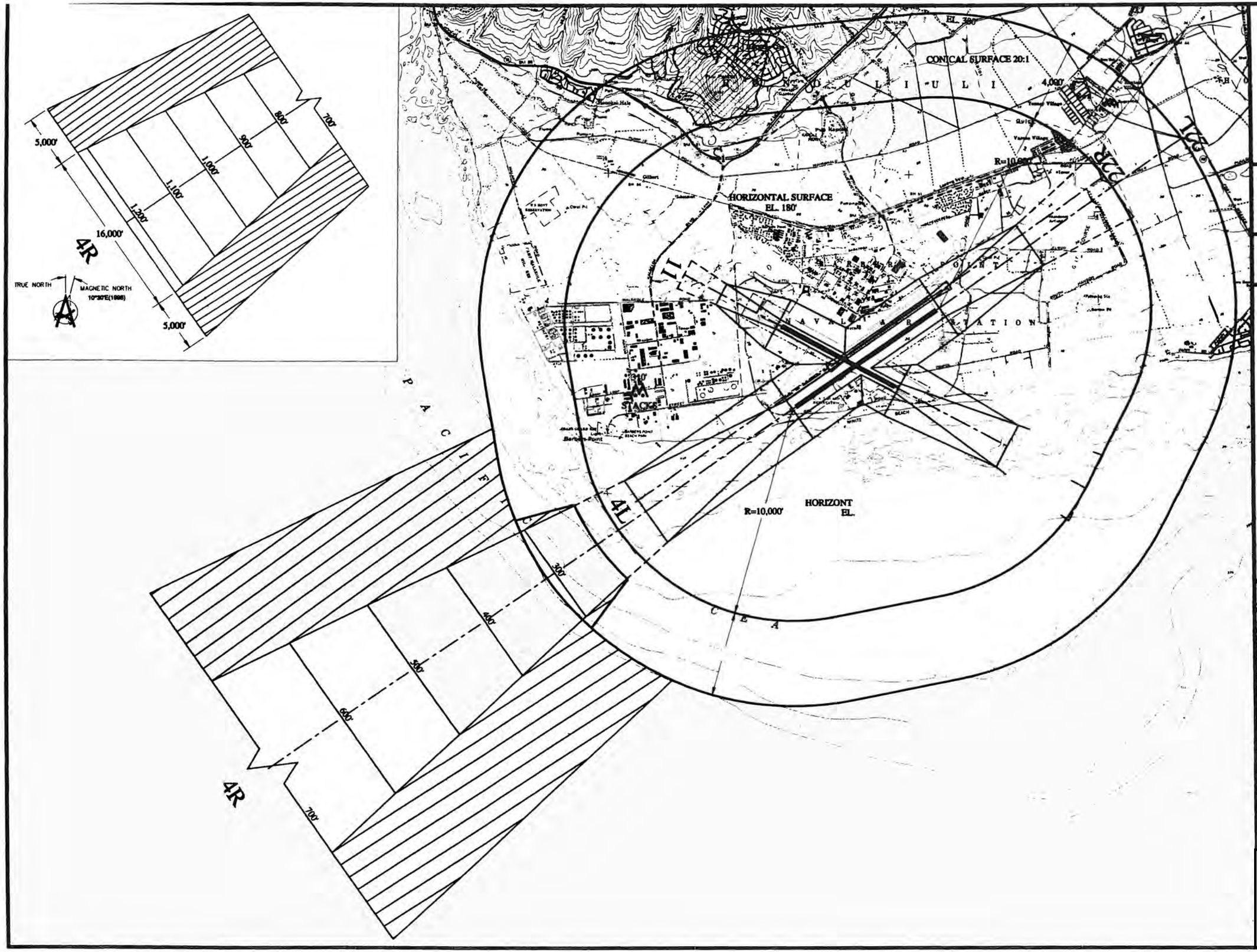
ISLAND OF OAHU

AIRPORT LAYOUT DRAWING

NO.	REVISIONS	DATE

Source: HDOT-A, Kalaeloa Airport Master Plan (1998)

FIGURE 1-7A
Airport Layout Plan - Layout Drawing



STATE OF HAWAII

Airports Division

DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII

KALAELOA AIRPORT MASTER PLAN

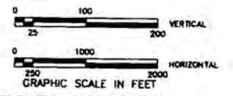
ISLAND OF OAHU

AIRSPACE PLAN

NO.	REVISIONS

Source: HDOT-A, Kalaeloa Airport Master Plan (1998)

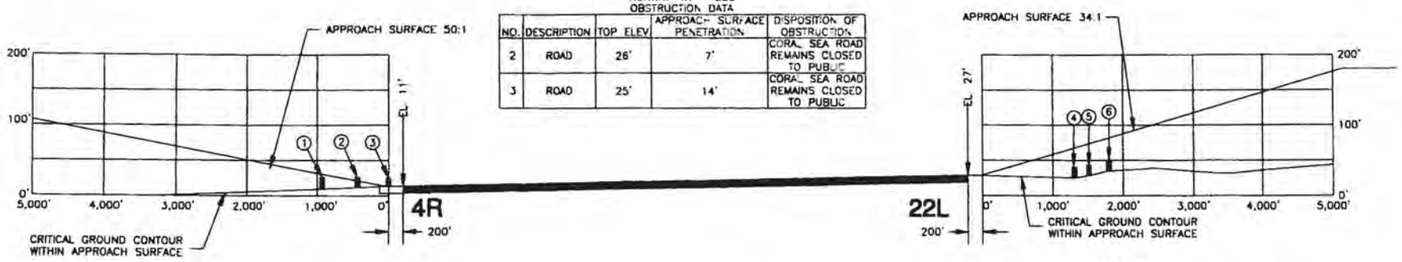
FIGURE 1-7B
Airport Layout Plan - Airspace Plan

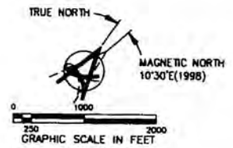


PROFILE VIEW

RUNWAY 4R – 22L OBSTRUCTION DATA

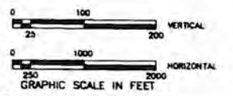
NO.	DESCRIPTION	TOP ELEV	APPROACH SURFACE PENETRATION	DISPOSITION OF OBSTRUCTION
2	ROAD	26'	7'	CORAL SEA ROAD REMAINS CLOSED TO PUBLIC
3	ROAD	25'	14'	CORAL SEA ROAD REMAINS CLOSED TO PUBLIC



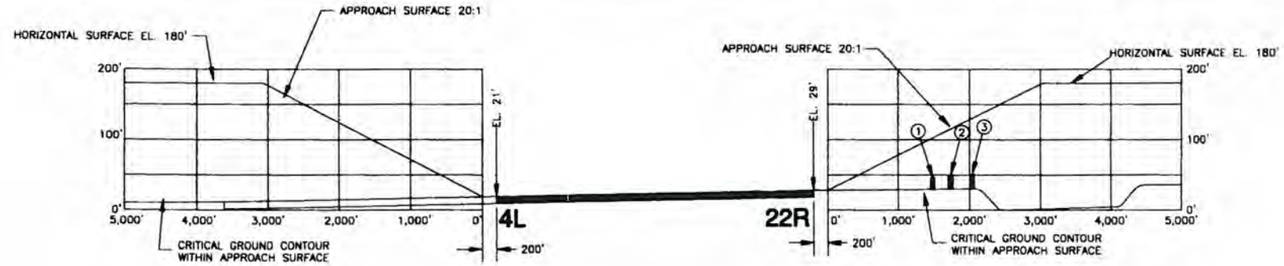


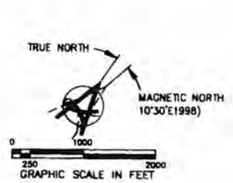
PLAN VIEW

①②③ CORAL SEA ROAD IS ASSUMED TO BE EITHER CLOSED OR AN ON AIRPORT SERVICE ROAD IN THIS AREA AND REMAIN CLOSED TO PUBLIC ACCESS.

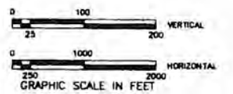


PROFILE VIEW

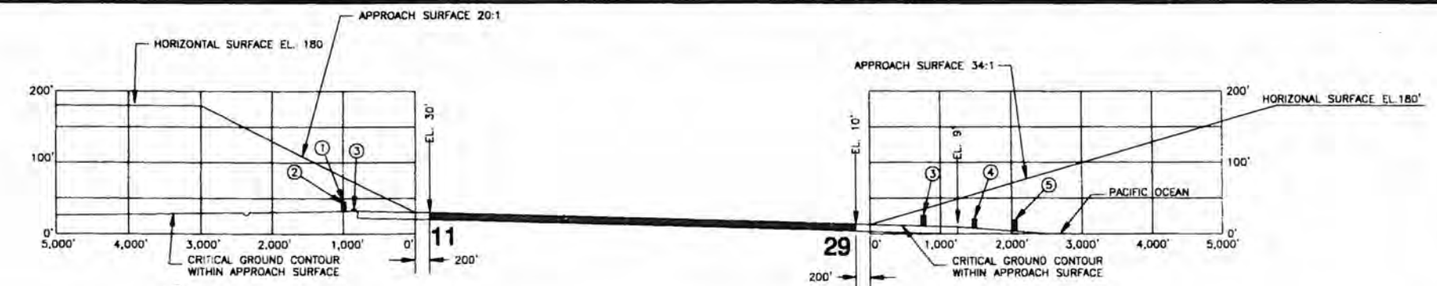


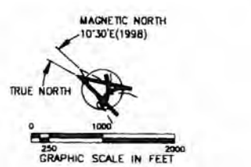


PLAN VIEW



PROFILE VIEW





PLAN VIEW

①②③ MIDWAY ROAD IS ASSUMED TO BE EITHER CLOSED OR AN ON AIRPORT SERVICE ROAD IN THIS AREA AND REMAIN CLOSED TO PUBLIC ACCESS.

Airports Division
DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII

KALAELOA AIRPORT MASTER PLAN

ISLAND OF OAHU

INNER APPROACH SURFACE DRAWING

NOTE:

THIS DRAWING IS FOR PLANNING PURPOSES ONLY AND IS NOT INTENDED FOR CONSTRUCTION OR NAVIGATIONAL PURPOSES.

THE PREPARATION OF THIS DOCUMENT WAS FINANCED IN PART THROUGH A PLANNING GRANT FROM THE FEDERAL AVIATION ADMINISTRATION AS PROVIDED UNDER SECTION 505 OF THE AIRPORT AND AIRWAY IMPROVEMENT ACT OF 1982, AS AMENDED.

NO.	REVISIONS	DATE

Source: HDOT-A, Kalaeloa Airport Master Plan (1998)

FIGURE 1-7C
Airport Layout Plan - Inner Approach Surface Drawing

1.5.1. Airfield

JRF has two parallel runways (4R-22L and 4L-22R) and a crosswind runway (11-29) that intersects the parallel runways and associated taxiways at midfield. Runway 4R-22L is 8,000 feet x 200 feet; Runway 4L-22R is 4,500 feet x 200 feet; and Runway 11-29 is 6,000 feet x 200 feet. The centerlines of the parallel Runways 4R-22L and 4L-22R are separated by 625 feet and are oriented in an approximate southwest-northeast alignment, with runway azimuth of 234 degrees, 58 minutes 14 seconds true. Runway 4R-22L is 8,300 feet long by 200 feet wide with an effective gradient of 0.19 percent from a threshold elevation of 11 feet on Runway 4R up to a threshold elevation of 27 feet on Runway 22L. Runway 4L-22R is 8,300 feet long by 200 feet wide with an effective gradient of 0.19 percent from a threshold elevation of 13 feet on Runway 4L up to a threshold elevation of 29 feet on Runway 22R. Only 4,500 feet of Runway 4L is used. Both runways are painted with precision instrument runway markings and equipped with High Intensity Runway Lights (HIRL). There are distance-to-go markers on both runways.

The *Hawaii Airports and Flying Safety Guide* (Hawaii Airports Guide) published by the HDOT-A states departures are not authorized on Runway 29. Similarly, arrivals are not authorized on Runway 11.

1.5.2. Aircraft Operations

The current primary users of the airfield are small, single engine aircraft operated by local residents. These aircraft are primarily used for training purposes or flown for personal use in the local surrounding airspace. A small percentage of aircraft utilizing the airfield are scheduled charter aircraft, transient general aviation or corporate aircraft. The remaining are military aircraft. The HDOT-A collects airport activity statistics at all State-owned airports, including JRF. Data on aircraft operations, defined as aircraft movements, landings and takeoffs combined, are collected by the air traffic control tower and reported to the HDOT-A. The data is collected for local and itinerant operations. Local operations are performed by aircraft that (1) operate in a local traffic pattern or within sight of the airport, (2) are known to be departing for, or arriving from, flight in local practice areas located within a 20-mile radius of the airport, and (3) execute simulated instrument approaches or low passes at an airport. Itinerant operations are all aircraft arrivals and departures other than local operations.

Over the years, aircraft operations at JRF have varied, most likely due to the high level of touch and go activity at the airport. From calendar year (CY) 2010 to 2020, the highest level of activity was CY 2018 with 162,699 total operations and the lowest was CY 2010 with 112,830 total operations, a difference of 49,859 total operations or roughly 44 percent of the lower bound.

1.5.3. Hangars

There are two large hangars (Building 110 and 111) north of the intersection of the runways. Hangar 110 (105,284 square feet) and Hangar 111 (102,270 square feet) are located north of the aircraft parking aprons and south of Midway Street. Each hangar has an interior clear area of about 75,000 SF for aircraft parking. Hangar 110 is currently leased for aircraft storage

purposes. When no longer used for aircraft storage, the hangar could be leased for commercial aviation uses. Hangar 111 is owned by the University of Hawaii and is located about 300 feet southeast of the project site.

The hangars were built as part of the original base construction in the early 1940's and, according to the U.S. Navy's FEIS, both hangars have been determined to be eligible for listing on the National Register of Historic Places. There are a total of 7 ready magazines adjacent to these hangars (4 adjacent to Hangar 110 and 3 adjacent to Hangar 111), which have also been determined to be eligible for listing on the National Register of Historic Places.

Aircraft parking apron areas for based and itinerant aircraft tiedowns are provided for over 120 aircraft on the existing eastern apron south of the two large hangars. Space is available for additional tiedowns as needed. The Airport Layout Plan keeps the line-of-sight between Runways 11 and 22R clear of tiedowns.

1.5.4. Administration/Air Traffic Control Building

Building 4 is a 17,238-square foot, 3-story air operations building/air traffic control tower located north of the intersection of the runways and south of, and adjacent to, Midway Street. An airport rotating light beacon is located on top of the Air Traffic Control Tower. The Hawaii Airports Guide shows the hours of operation of the air traffic control tower to be 0600 to 2200 hours (6:00am to 10:00pm). Building 4 is located about 1,400 feet southeast of the project site.

According to the Navy's FEIS, Building 4 has also been determined to be eligible for listing on the National Register of Historic Places.

1.5.5. Weather Service

There are wind cones near the ends of Runways 4L, 11, 22L and 29 and just west of the intersection of the runways and a tetrahedron just east of the intersection of the runways. There is an Automated Surface Observing System (ASOS) located east of the runway intersection. The Hawaii Airports Guide shows that weather service information is broadcast from 2200 to 0600, nightly.

1.5.6. Navigation Aids

Existing navigational aids include high intensity approach lights with sequenced flashers on Runway 4R. There are wheel-up lights for Runway 4L.

The Ewabe nondirectional beacon (NDB), which is associated with the instrument landing system to Runway 8L at HNL, is located 4,700 feet northeast of Runway 4L-22R.

1.5.7. Fuel Storage

Aviation gasoline for aircraft fueling is provided by a 10,000-gallon above-ground fuel tank with attached dispenser. The fuel tank, located on the apron south of building 1792, is protected by a series of bollards. Prior environmental review documentation outlined that HDOT-A had

intended to lease the fueling facility to a FBO to operate, consistent with the proposed action. It was also outlined that the availability of fueling services will make JRF attractive to general aviation aircraft owners, as it will provide an alternative location for fuel that is generally available at HNL and HDH. This existing fuel tank is located adjacent to the FBO hangar and will continue to be operated by the current operator.

1.6. Surrounding Uses

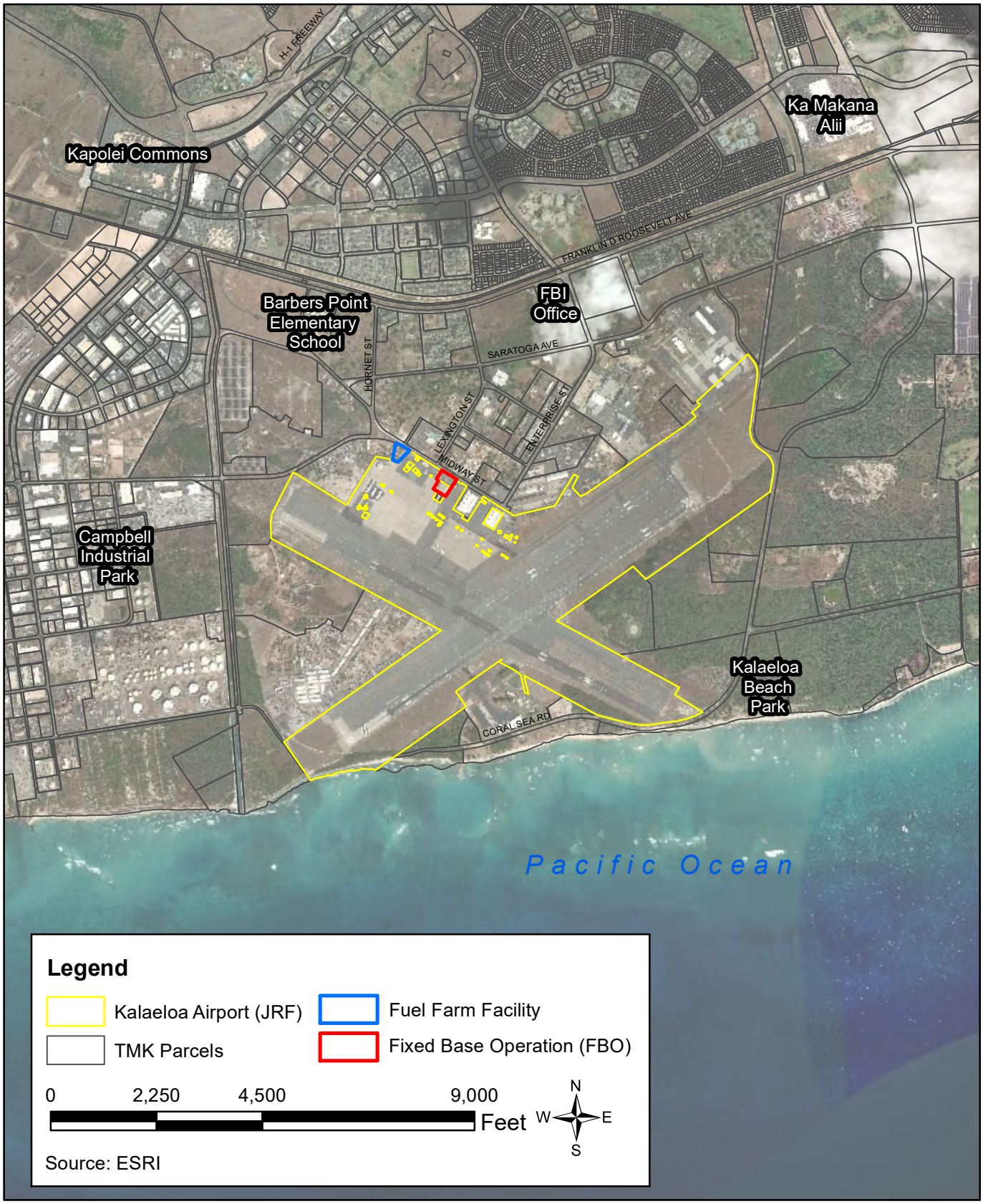
The U.S. Navy retained approximately 1,128 acres (1,238 acres less 110 acres of noncontiguous areas) of land when BPNAS closed. This land is used for housing, recreation, operation and community support services. In 2000, the U.S. Navy sold or leased approximately 675 acres of U.S. Navy land along Franklin D. Roosevelt Road and select parcels in other areas of Oahu.

The project site falls within JRF and is within the greater KCDD, which is comprised of 3,695 acres in the Kalaeloa area of West Oahu. A school, the American Renaissance Academy, and other industrial uses are located nearby. KCDD is bounded by the Pacific Ocean and lands within Roosevelt, West Perimeter, East Hansen, and Essex Roads in addition to four parcels within Campbell Industrial Park (See Figure 1-8: Surrounding Uses Map).

The HCDA, a State agency charged with overseeing redevelopment in different locations, administers Kalaeloa. HCDA envisions the future of Kalaeloa as a mixed-use urban development. West Oahu and the community of Kapolei have experienced significant residential, commercial, and institutional growth over the past decade. The City and County of Honolulu has placed several government offices in this area, and the University of Hawaii (UH) has built a new West Oahu campus, serving as a four-year collegiate educational institution offering several degree programs. A new rapid transit rail line is also being constructed to link this area with central Honolulu. Future planned development in the KCDD encompasses a range of several large institutional development projects, including a new Tripler Army Medical Center outpatient clinic, a recently constructed 150,000 square foot Federal Bureau of Investigation (FBI) office and training center, a solar farm, and plans for a new Veterans' Administration clinic.

1.7. Land Ownership

The project site is located within the boundaries of JRF, which was acquired by HDOT-A in 1999 for use as a general aviation (GA) airport. JRF is currently operated under the direction of the HDOT-A.



WILSON OKAMOTO CORPORATION

FIGURE 1-8

Surrounding Uses Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

(This page intentionally left blank)

CHAPTER 2: PROPOSED ACTION

2. PROPOSED ACTION

2.1. Project Description

The proposed action consists of two primary elements: 1) the FBO, and 2) the Fuel Farm Facility. The Applicant, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu, has identified adjacent locations at JRF to construct these two facilities. The proposed action is intended to serve existing and future general aviation (GA) demands along with both commercial and military aircraft operations at JRF.

The proposed FBO site is located in a developed area, while the proposed Fuel Farm Facility site is situated in an area of disturbed vacant land that was used by the military and evaluated in past environmental studies. From a use standpoint, the proposed project improvements are consistent with the JRF Airport Layout Plan (ALP), which designates the project site for use as lease lots, intended to be leased to prospective fixed base and GA operators.

The proposed FBO is envisioned as a pre-engineered metal and glass building measuring approximately 50 feet high, 310 feet long, and 140 feet wide. An associated parking area with approximately 100 stalls will also be provided. Within the building, there will be approximately 40,000 Square Feet (SF) of programmable space for GA use. Conceptually, the proposed program may consist of approximately 30,000 SF for a GA aircraft hangar; approximately 8,000 SF for a two-story office area that may include uses such as an executive airport terminal/lobby, conference room, pilot lounge and theater rooms, quiet rooms, café/refreshment area, and associated offices spaces; and approximately 2,000 SF for a ground service maintenance area intended as an equipment storage and service area for all vehicles servicing the air operations of the FBO. A hangar door approximately 150 feet wide by 28 feet high on the ramp side of the facility will provide runway access to GA aircraft and service vehicles (See Figure 2-1: Fixed Base Operation (FBO) Site Plan).

Military and general aviation aircraft and personnel are anticipated to use the proposed facilities. Types of planes will consist of military transport, support, and fighter aircraft. Additionally, small to medium general aviation aircraft are also anticipated to utilize the facilities. The aircraft will be no different from the types of aircraft that are currently being serviced at the airport.

The Fuel Farm Facility is anticipated to encompass up to eight (8) 30,000-gallon Jet A Fuel above-ground, horizontal storage tanks with associated access stairs and catwalks. The total potential gross storage capacity of this Fuel Farm Facility is projected to amount to 240,000 gallons. In addition, two (2) Jet A Fuel offloading skids are proposed. These skids will include a pump, filtration elements, relaxation chamber, flow meter, control valve, and an offloading hose. Also proposed is one (1) 15,000-gallon Aviation gas (Avgas) tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon tanks used by various motor vehicles (mogas). The Avgas, diesel, and mogas tanks will each have offloading and loading capabilities. A sized concrete containment area will be built for storage tanks and includes access stairs, containment drains,

and an intermediate diked wall. A circular vehicle drive path will be used for access around the tank containment area.

For drainage, a stormwater system for non-contact and contact water, including collection and infiltration will be installed. Million Air is required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and to prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage increases in stormwater runoff form impermeable surfaces. Drainage for the project site will be accommodated by an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an onsite underground injection control drainage well for disposal.

For safety reasons, an 8-foot-tall security fence will be installed around the lease lot line with a sliding entrance gate for access. Early design and programming of the Fuel Farm Facility anticipates that three (3) 30,000-gallon above-ground horizontal storage tanks will be constructed, with the remaining balance to follow in response to market demand (See Figure 2-2: Fuel Farm Facility Site Plan).

Electrical service will be provided to the FBO and the Fuel Farm Facility. Infrastructure improvements for water, fire protection, and sewer will be constructed near the FBO and Fuel Farm Facility for use by the Applicant. Utility service to the facilities on the lease lot will be the responsibility of the Applicant.

Both the FBO and Fuel Farm Facility will provide access for emergency vehicles. Civil design drawings will be submitted to the City and County of Honolulu Fire Department (HFD) for review and approval as development proceeds.

2.2. Purpose and Need

According to HCDA's 2006 Kalaeloa Master Plan, JRF is envisioned as a prime economic driver, creating jobs and providing services as population in the region continues to grow. Therefore, the overarching purpose and need of the proposed action is to develop the FBO and Fuel Farm Facility to serve existing and future GA operations along with both commercial and military aircraft operations at JRF. To be clear, the proposed action is not anticipated or intended to significantly impact the capacity of aircraft operations at JRF. Instead, it will serve to facilitate, streamline, and improve the efficiency and commercial viability of GA, commercial, and military aircraft operations.

Pursuant to this, the JRF Master Plan identified the need to provide space for lease lots which the HDOT-A can lease to individual lessees for aviation-related uses. Use of lease lots is typically done at most of the State's airports. The terms and conditions of the lease can vary according to the lessee's intended use. Generally, one of the conditions of the lease is the lots must be used for aviation related purposes. The HDOT-A has also developed lease lots at Daniel K. Inouye International Airport (HNL) along Lagoon Drive. The proposed action is consistent with the HDOT-A plan. The development of the proposed action is not anticipated to significantly impact the volume of aircraft operations at JRF.

Moreover, the proposed action is consistent with the U.S. Navy 1999 FEIS, State-preferred alternative, which was also the U.S. Navy's preferred alternative: Continued use of the existing runways and aviation related facilities.

2.3. Development Schedule

Following design and permitting, construction for the Fuel Farm Facility is anticipated to commence sometime in Q2 2021, with the completion and turn-key operation targeted for Q3 2021. Construction of the FBO facility, by contrast, is anticipated to commence sometime in late 2021, following the conclusion of associated design and permitting.

2.4. Project Costs

The proposed action is anticipated to cost approximately $12 million to construct. No federal funds will be used for construction of the facilities. Project expenses and expenditures will serve to contribute to the State and local economy directly and indirectly.

(This page intentionally left blank)

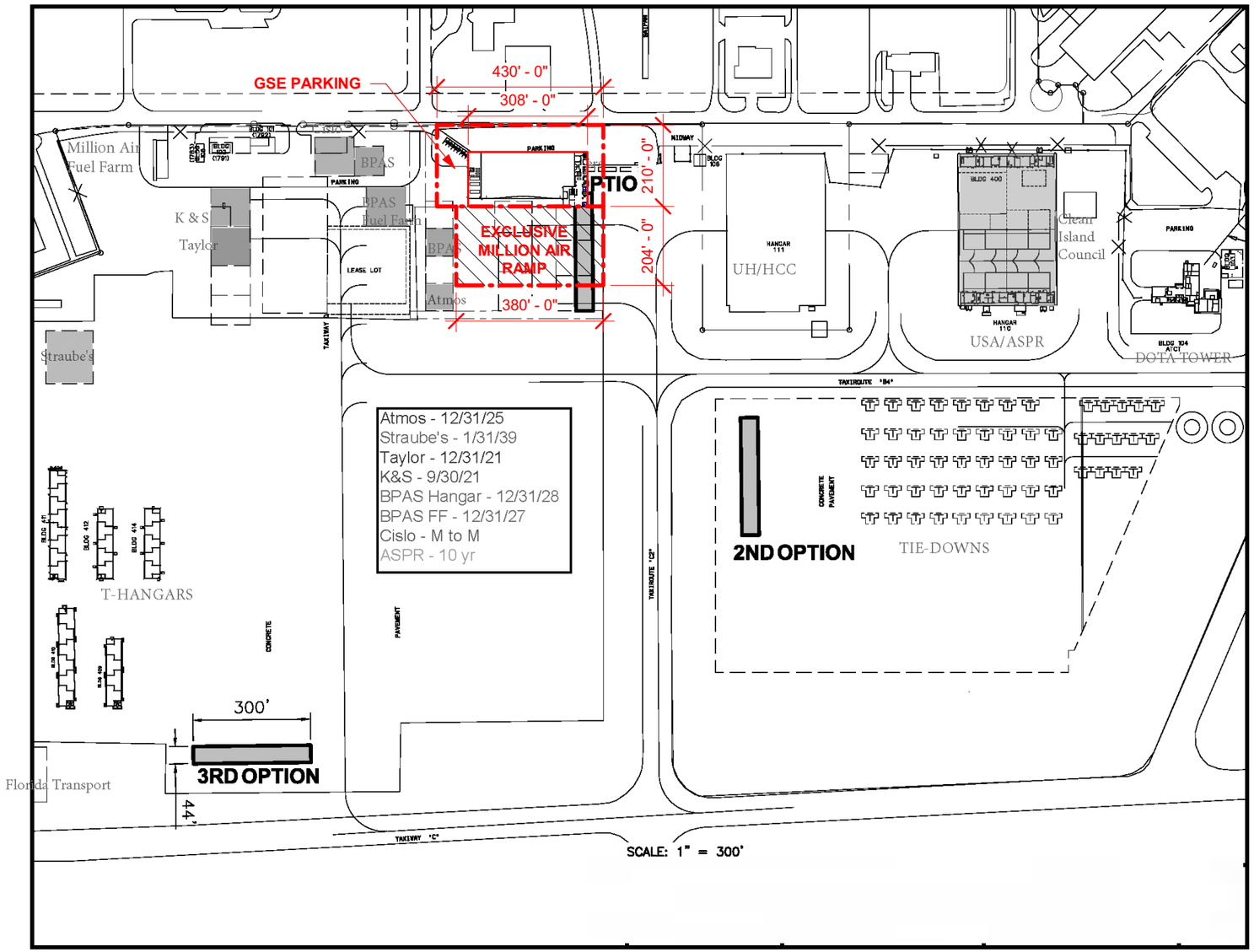


FIGURE 2-1
Fixed Base Operation (FBO) Site Plan

Exist. R/W

1" = 20' TRUE NORTH

1– 1/16 Bend (2° Defl.)
1– Conc. Blk.

25' Light Pole With (2) SLM–LED–24 Area Lights (Typ. 4)

6" PCC Pavement

Crushed Rock (#3 Course, Grade A)

Connect to Exist. Waterline
1– 1/4 Bend
1– Concrete Block
W/Struct. Struts.
(Contractor to Verify Size)

Lease Line

10,000 Gal. Above Ground AVGAS Double Wall UL–142 Horizontal Fuel Tank

Concrete Pad

Concrete Containment Pad W/Conc. Curb

Benchmark "Pad"
22,126.38 S
1,672.86 W
Elev.= 45.19

Exist. R/W

MIDWAY AVENUE (CITY)

Exist. R/W

Bollards, Typ.

6" Conc. Curb

Emergency Shut Off Switch Mounted To Light Pole

℄ Dwy. A

Begin 8' High Security Fence

8' High Security Fence

Lease Line

DMH

D8

30'

20' Min.

211°42'40" → 152.50'

2+00

3+00

4+00

R=50'

30,000 Gallon Above Ground Jet–A Double Wall UL–142 Horiz. Fuel Tank

Benchmark "Site"
22,406.04 S
1,740.28 W
Elev.= 43.25
Mag. Nail

500 Gal. UL–2085 Protected Above Ground Fuel Tank MOGAS

500 Gal. UL–2085 Protected Above Ground Fuel Tank Diesel

Bollards, Typ.

301°40'00", 42.02'

5' Wide Personnel Access Gate

FRANKLIN AVENUE

2 Cameras, 1 Pointing Toward Gate, Single Cameras at Other Locations

40'

R=25'

121°40'00", 134.00'

1+00

1– 1/4 Bend
1– Conc. Blk.

Sta. 7+52.36=
Sta. 0+67.03
End Dwy. A

End 8' High Security Fence

7+52.36

7+00

6+00

D12

53.3'

Window High I.D. Scanner Post With Bollards (2)

43.4'

R=35'

R=20'

0+00

86'

42'

23'

20'

55'

63'

11.5'

27.6'

23.9'

45'

51'

28'

Concrete Pad

Concrete Containment Pad W/Conc. Curb

DMH

D8

GDI

Eye Wash and Hose Bibb on 3'x3' Conc. Slab

Emergency Shut Off Switch Mounted To Light Pole

5+00

Conn. To Exist. E/W12
1 – 1/8 Bend
1 – Conc. Blk.
W/Struct. Struts
(Contractor to Verify Size)

Conn. Fire Hydrant To Exist. E/W12
1 – 12"x6" Tee
1 – 6" G.V.
1 – Valve Box
1 – 6", 1/4 Bend
1 – Conc. Blk.
Hydrant Curb Guard
(See BWS Std. Det FH–11)

① (2) 450GPM Loading Skid With Pump Control Panel

② (2) 240GPM Offload Skid With Pump Control Panel

6" Conc. Curb

50 Gal. Recovery Sump Tanks, Typ.

W 3/4"

GDI

1– 1/8 Bend
1– Conc. Blk.

Future Shed

Retention Basin

D12

DMH

New HECO Transformer

End 8' High Security Fence

Limit of PCC Pavement

Sliding Gate

Sta. 0+00 Begin Dwy.

"SC–73" Benchmark
To Dwy A Sta. 0+00
13°15'12", 40.52'

Dwy. A Sta. 7+52.36
To "SC–73" Benchmark
266°20'04", 66.48'

Begin 8' High Security Fence

Conc. Strip

3,000 Gallon Oil/Water Separator

31°42'40", 227.48'

Lease Line

Fence Line

Oil Water Seperator Local Alarm Panel

New 400 Amp 480/277 Service Panel

120VAC Transformer
120VAC Service Panel

Double Swing Gate

37.5'

Reconstruct AC Curb and Shldr Pav't

Benchmark "SC–73"
22,473.40 S
1,583.05 W
Elev.= 39.72
Mag. Nail

Benchmark "Straube"
22,246.29 S
1,432.51 W
Elev.= 43.33
Mag. Nail

SITE AND UTILITY PLAN
Scale: 1" = 20'

Graphic Scales:
1" = 20' 20' 10' 0 20' 40'

IF SHEET IS LESS THAN (22" X 36") IT IS A REDUCED PRINT – SCALE REDUCED ACCORDINGLY

MICHAEL H. OKAMOTO LICENSED PROFESSIONAL ENGINEER No. 8624–C HAWAII, U.S.A.

THIS WORK WAS PREPARED BY ME OR UNDER MY SUPERVISION AND CONSTRUCTION OF THIS PROJECT WILL BE UNDER MY OBSERVATION.

Michael H. Okamoto APRIL 30, 2022
SIGNATURE DATE

"OBSERVATION OF CONSTRUCTION" IS DEFINED IN CHAPTER 16–115, HAWAII ADMINISTRATIVE RULES, ENTITLED "PROFESSIONAL ENGINEERS, ARCHITECTS, SURVEYORS AND LANDSCAPE ARCHITECTS."

REVISIONS	DATE		SHT. NO.	APPROVED

FIGURE 2-2
Fuel Farm Facility Site Plan

MILLION AIR KALAELOA JET FUEL FACILITY

KALAELOA, OAHU, HAWAII

SITE AND UTILITY PLAN

DESIGN	MHO
DRAWN	CC
CHECKED	MHO
DATE	November 24, 2020
PROJECT NO.	

C301

SHEET 6 OF 8 SHEETS

FILE DRAW FOLDER NUMBER

Planning – Engineering – Environmental Services – Photogrammetry – Surveying – Construction Management
R. M. TOWILL CORPORATION
808 842 1133 2024 North King Street Suite 200 Honolulu Hawaii 96819–3494

CHAPTER 3: DESCRIPTION OF EXISTING ENVIRONMENT, IMPACTS, AND MITIGATION MEASURES

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

3.1. Climate & Climate Change

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

The project is located in the Ewa area which has a climate typical of the leeward coastal lowlands of Oahu. The area is characterized by abundant sunshine, persistent trade winds, relatively constant temperatures, moderate humidity, and the infrequency of severe storms. Northeasterly trade winds prevail throughout the year although its frequency varies.

Average daily minimum and maximum temperatures typically range from the low 60s (degree Fahrenheit) to the low 90s, depending on the time of the day and the season. Daily temperatures vary by about 7 degrees between winter and summer seasons, and 15 to 20 degrees between day and night.

Northeasterly trade winds prevail much of the time throughout the island of Oahu. These trade winds vary in frequency. Often times they last for weeks on end. Other times they are virtually absent. This is in general due to the location of the North Pacific high-pressure system. During the spring and summer months, this system is larger, stronger and shifts farther to the north and produces stronger, more persistent trade winds. In the fall and winter months, this high-pressure system degrades and shifts to the southeast, at which time the general wind patterns become weaker and more variable. Typical wind velocities range between 8 and 15 miles per hour.

The State of Hawaii is being impacted by a myriad of climatic changes, including rising sea levels, warming ocean temperatures, changing rainfall patterns, a decrease in stream base flow, changing wind and wave patterns, and changing habitats and species distribution. There is no consensus, however, about the exact nature, magnitude, and timing of how these changes will occur. Generally speaking, there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.

GHGs absorb and “trap” solar radiation instead of reflecting it back into space. Typical GHGs include carbon dioxide, methane, nitrous oxide, and chlorofluorocarbons. The main sources of GHG emissions resulting from human activity are from the following sectors, in order from most emissions to least: fossil fuel power stations, industrial activity, transportation, agriculture,

fossil fuel processing, residential and commercial activity, land use and biomass burning, and waste disposal and treatment. In 2007, the United States was responsible for approximately 20 percent of global carbon dioxide emissions (WRI 2010). Within Hawaii, the City and County of Honolulu accounts for approximately 69 percent of the state's total GHG emissions (ICF and UHERO 2019).

Impacts and Mitigation Measures

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

The exact nature of how the climate will change is unknown. New information will continually be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to climatic changes.

Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm Facility will support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.

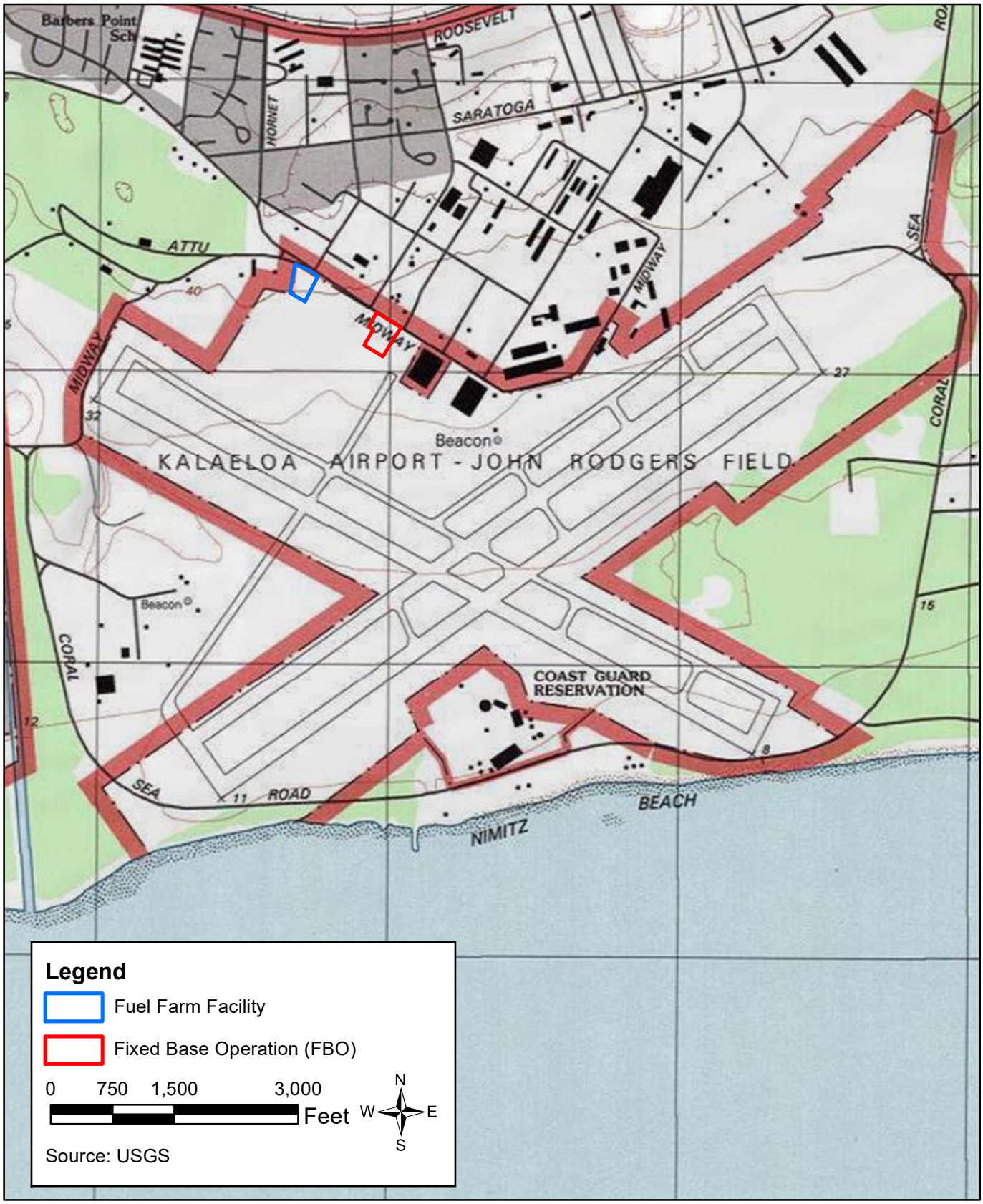
During construction, applicable erosion control measures and best management practices will be implemented in order to mitigate any possible adverse effects relating to runoff. As applicable for each phase, these may include but are not limited to: temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, slope protection, stabilized construction vehicle entrance, grate inlet protection, truck wash down areas, and use of compost filter socks. Permanent sediment control measures will be used once construction is completed.

3.2. Physical Environment

3.2.1. Geology, Topography and Soils

The island of Oahu is of volcanic origin formed by the Waianae Range to the west and the younger Koolau Range to the east. Both are remnants of shield volcanoes, but the term "range" indicates that they have lost most of their original shield outlines and are now long, narrow ridges shaped largely by erosion. Later post-erosional eruptions sent lava down the valleys and resulted in the formation of volcanic cones such as Diamond Head and Tantalus.

The Waianae Volcano created the western half of Oahu, and the Koolau Volcano formed the Koolau Range and the Schofield Plateau. JRF is located at the edge of the Schofield Plateau on a relatively flat coastal plain, which is composed of interbedded coral reef and alluvial volcanic sediments ("caprock") overlying the basalt (volcanic rock) (See Figure 3-1: USGS Topographic Map). The caprock ranges from 50 to 400 feet thick along the northern boundary of the former



WILSON OKAMOTO CORPORATION

FIGURE 3-1

USGS Topographic Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

BPNAS and from 750 to 1,000 feet thick along the coast. The upper 100 feet (30 m) of caprock is marine sediment, consisting mainly of coral reef with minor layers of shell fragments and beach sands.

According to the Soil Conservation Service's *Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii* dated August 1972, JRF is situated on coral outcrop (CR) with little or no soil cover. Across nearly the entire airport, soil cover consists of a thin layer of friable, red material present in cracks, crevices, and depressions in the coral outcrop. Along the northern, western, and eastern boundaries of the airport the soils are Mamala Stony silty clay loam. This soil type is formed in shallow alluvial deposits over the coral and is dark reddish-brown stony silty clay loam, neutral to mildly alkaline, with moderate permeability and slight to moderate erosion potential. The south shore comprises of beach light-colored sands derived from coral and seashells. The airfield is situated on filled land consisting of material dredged from the ocean or hauled from nearby areas, and general material from other sources (See Figure 3-2: Soils Map).

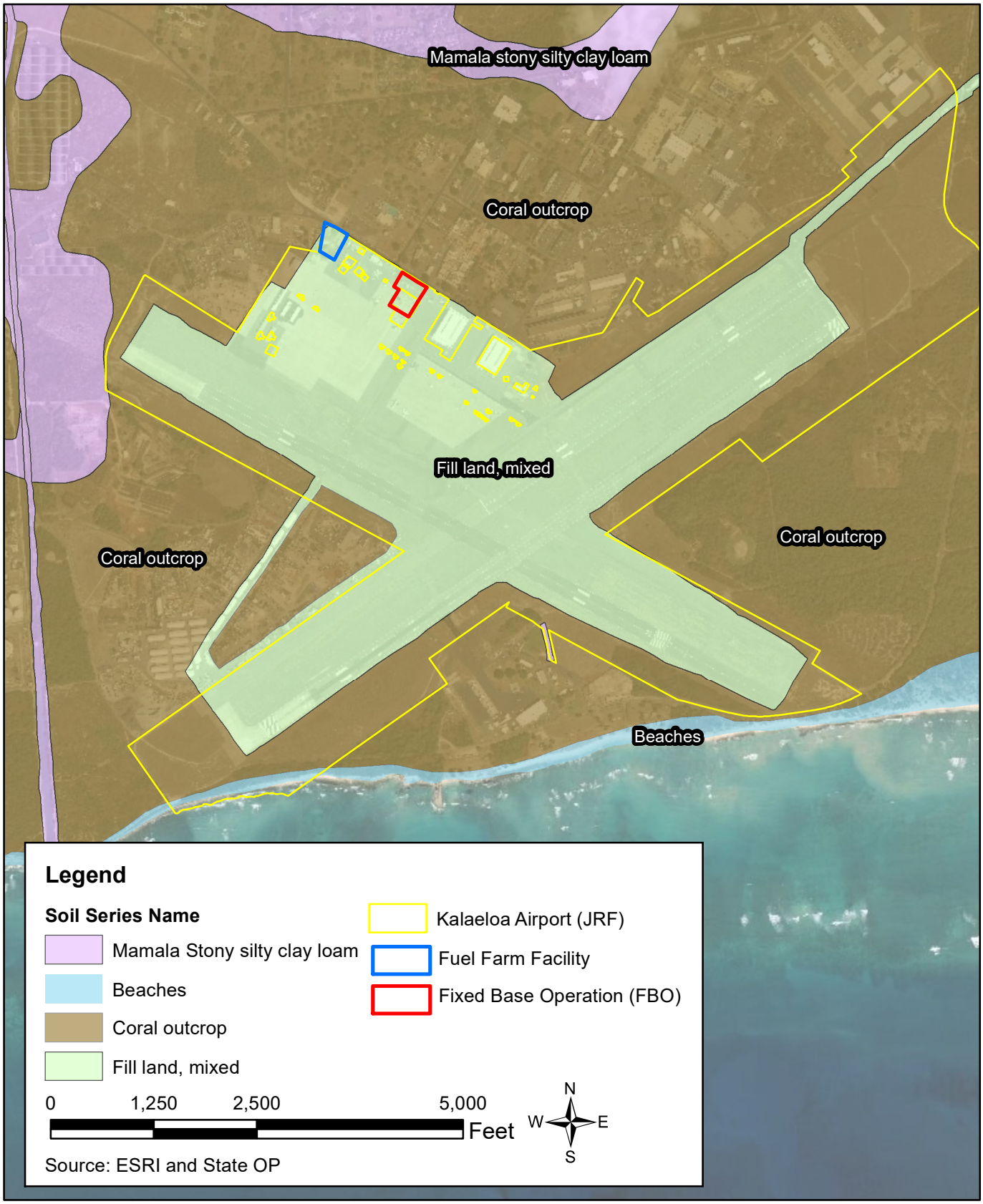
Impacts and Mitigation Measures

Construction of the proposed action will require subsurface excavation for placement of the foundations and footings for the various structures. Since construction of the FBO site involves the redevelopment of a previously developed concrete aircraft parking apron, removal of the existing concrete will be required first. Subsurface excavation will then be required to set footings and slab foundations for the buildings and structures. At the Fuel Farm Facility site, construction will involve removal of former AC pavement and base course encompassing a small portion of the site with the remainder consisting of grubbing and grading work. Excavation will also be required for the utility lines which will be placed in a trench at a depth of about 5 feet.

The subsurface work will be done by using a trenching machine or backhoe for the utility trenches. An augur could also be used to drill for the deeper footings. Excavation for the trenches and footing will not create adverse impacts to the geology and soils of this area of Oahu.

The FBO and Fuel Farm Facility will be designed and constructed to meet the requirements of the 2006 IBC. Compliance with the IBC will ensure that the structures can meet the seismic loadings established for the project site. This will ensure that the geological conditions at the project site do not adversely affect the building and related facilities.

The Applicant is required to follow HDOT-A's Programmatic Environmental Hazard Evaluation and Environmental Hazard Management Plan (EHE-EHMP), which includes guidelines and requirements for testing and management of contaminated soils. The Applicant is creating a health and safety plan and will screen the site for contaminants during construction. Additionally, any soil stockpiles that will be removed off the construction lot will be analyzed per the State of Hawaii, Department of Health (DOH) regulations and properly disposed of depending on the compounds detected.



WILSON OKAMOTO CORPORATION

FIGURE 3-2

Soils Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

A NPDES permit for stormwater discharges related to project construction activities will be required as individual and/or cumulative soil disturbances at the project site will exceed one acre of land area. The permit requires a Stormwater Pollution Prevention Plan (SWPPP) to document the measures that will be taken to prevent stormwater runoff from construction activities. Prior to construction, preparation of an erosion control plan and installation of BMPs is also required and will be inspected by HDOT-A's third-party inspector to ensure that all BMPs measures are properly installed per the SWPPP and plan drawings, and that all required documentation and permits are in place prior to excavation activities. These BMPs will be inspected routinely construction and will be completely removed, once it is confirmed that the area is fully stabilized, after construction.

In addition, the proposed action may be required comply with the City's prevailing soil erosion and water quality standards ("Rules Related to Water Quality"). However, the project site is within the existing JRF under the jurisdiction of the HDOT-A and is within the greater Kalaeloa Community Development (KCDD) under the jurisdiction of the State's Hawaii Community Development Authority (HCDA). Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine any City soil erosion and water quality standards that may be applicable to the subject project.

3.3. Hydrology

3.3.1. Surface Waters, Coastal Waters, and Groundwater

Surface Waters: There are no perennial streams, ponds, or other surface water resources on or within close proximity of the project site.

The shoreline at JRF is composed of terrestrial alluvium and coral limestone deposited by the ocean which forms a wedge of sediments and sedimentary rock referred to as "caprock". The caprock layer in the vicinity of the project site is approximately 250 feet thick. The uppermost layer of this caprock contains brackish groundwater which is too salty for most irrigation purposes. The lower layers contain groundwater with seawater salinity.

Coastal Waters: Coastal waters, located approximately one (1) mile to the south of the project site, are classified as Class A Open Marine waters by the State of Hawaii Department of Health (DOH) (See Figure 3-3: Coastal Waters Map). As outlined in HAR, Chapter 11-54, Class A waters are classified by the DOH with the objective that, "their use for recreational purposes and aesthetic enjoyment be protected" and that, "these waters shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Groundwaters: The groundwater under the area of the former BPNAS is within aquifers that are part of the Ewa aquifer system of the Pearl Harbor aquifer sector. A confined aquifer is a deep layer of basalt, as well as a shallow unconfined aquifer in the overlying caprock, and is present under JRF.

WILSON OKAMOTO CORPORATION

FIGURE 3-3

Coastal Waters Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

This groundwater in the confined aquifer is brackish with a chloride content ranging from 250 to 1,000 milligrams per liter and considered too deep to be contaminated from the surface. According to the Federal Safe Drinking Water Act, this aquifer qualifies as a source of drinking water. However, the State has a more stringent standard for salinity and does not consider this aquifer a source for potable water use.

The shallow non-confined aquifer at Kalaeloa is brackish with chloride content ranging from 1,000 to 5,000 milligrams per liter; the water is not suitable for consumption or irrigation without desalination. This aquifer is at approximately 50 feet below ground surface along the northern boundary and at sea level along the shoreline. The aquifer is susceptible to contamination and no production wells have been developed.

Along with natural underground resources, JRF has an extensive system of drainage injection wells located throughout the airport property, which is regulated under an Underground Injection Control (UIC) permit (Permit No. UO-2072) with the DOH Safe Drinking Water Branch (SDWB). The drainage injection well system also includes wells constructed by the U.S Navy and a Swale/Trench located north of the Coast guard Facility. Sheet flow is carried by a series of inlets and pipes to this swale/trench which contains a network of dry wells located within the base of the swale/trench.

The Dry well system was built with the design intention to handle and drain storm event volumes. The DOH Safe Drinking Water Branch had approved the dry wells to be considered as a part of the Underground Injection control program (UIC). As measure to protect against discharge into State waters, Sandy loam underlying most of the airport effectively drains surface groundwater's flows into the ground.

Impacts and Mitigation Measures

No short or long-term significant impacts are anticipated on surface, coastal and/or groundwaters in the project vicinity during construction or operation of the proposed project. A NPDES permit for stormwater discharges related to project construction activities will be required as individual and/or cumulative soil disturbances at the project site will exceed one acre of land area. The permit requires a Stormwater Pollution Prevention Plan (SWPPP) to document the measures that will be taken to prevent stormwater runoff from construction activities. Prior to construction, preparation of an erosion control plan and installation of BMPs is also required and will be inspected by HDOT-A's third-party inspector to ensure that all BMPs measures are properly installed per the SWPPP and plan drawings, and that all required documentation and permits are in place prior to excavation activities. These BMPs will be inspected routinely construction and will be completely removed, once it is confirmed that the area is fully stabilized, after construction.

In addition, the proposed action may be required to comply with the City's prevailing soil erosion and water quality standards ("Rules Related to Water Quality"). However, the project site is within the existing JRF under the jurisdiction of the HDOT-A and is within the greater KCDD under the jurisdiction of the State's HCDA. Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine any City soil erosion and water quality standards that may be applicable to the subject project.

In the long-term, the project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills.

To mitigate impacts from potential spills, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean.

No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

3.4. Natural Hazards

3.4.1. Sea Level Rise

The Earth's climate has experienced natural changes and variability throughout its geologic timeline, however, the changes that have occurred over the past century are unprecedented. Anthropogenic GHG emissions are causing global warming and climate disruption. The concentration of carbon dioxide, as well as other GHG, are well outside the range of natural variability and are reaching the highest levels seen in at least 800,000 years (Hawaii Climate Change Mitigation and Adaptation Commission, 2017).

Sea level is rising at increasing rates due to global warming of the atmosphere and oceans and melting of the glaciers and ice sheets. Rising sea level and projections of stronger and more frequent El Niño events and tropical cyclones in water surrounding Hawaii indicate a growing vulnerability to coastal flooding and erosion. If GHG emissions are maintained at its current rate of increase, the Intergovernmental Panel on Climate Change (IPCC) (2014) predicts up to 3.2 feet of global sea level rise by the year 2100. However, recent observations and projections show that this magnitude of sea level rise could occur as early as year 2060 under recently published high-end scenarios (Sweet et al., 2017). There are questions and debate around the exact timing of that rise due largely to uncertainties around the future behavior of the Earth's cryosphere and global GHG emission trajectories.

The project site is not located within the 3.2-foot or 6-foot sea level rise exposure area (SLR-XA) as depicted by the National Oceanic and Atmospheric Administration (NOAA) Sea Level Rise data (See Figure 3-4: Sea Level Rise Exposure Map).

Impacts and Mitigation Measures

No short or long-term impacts on sea level rise are anticipated during construction or operation of the proposed project. The exact nature of how the sea level will rise and when is unknown. New information will continually be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to sea level rise.

3.4.2. Flood and Tsunami Hazard

Honolulu is vulnerable to flooding from inland streams, hurricane and tropical storm surge, and seasonal high waves. Honolulu has historically experienced widespread flooding (Fletcher et al. 2002).

The project site is 40 feet above mean sea level and is located within the area covered by Flood Insurance Rate Map Panel 310, Map Number 15003C0310F and Panel 320, Map Number 15003C0320F, both dated September 30, 2004. According to these maps, the project site is located within Zone D, areas where flood hazards are undetermined, but possible (See Figure 3-5: Flood Insurance Rate Map).

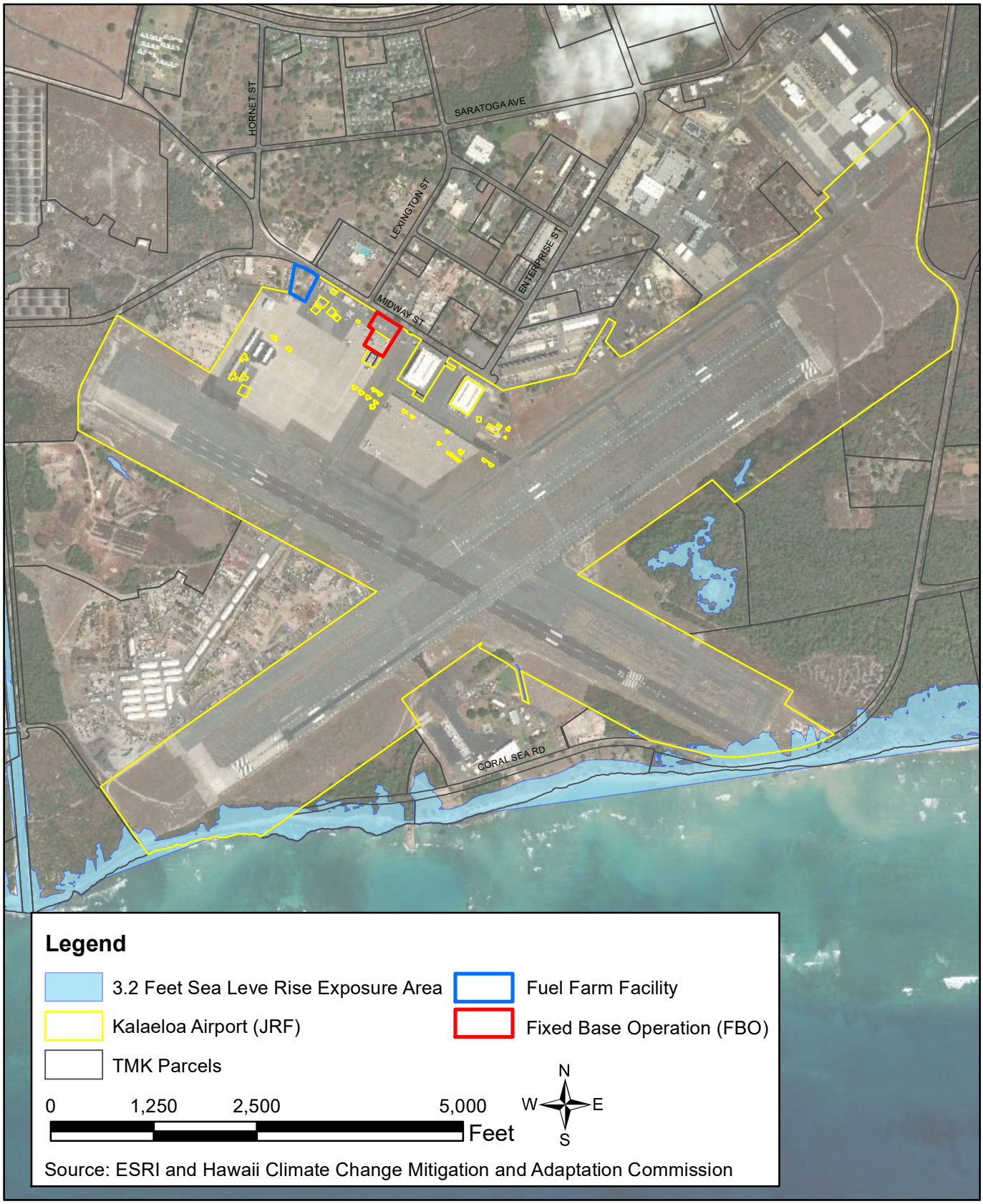
In addition, Map Number 15003C0320F shows that the shoreline portion of the airport is located in Zone VE, special flood hazard areas subject to coastal flooding with a velocity hazard.

The project site sits in a dry and arid environment where the risks of flooding are low due to a combination of factors that include low rainfall, thin soil layer, slope, and the porosity of the bedrock. During periods of heavy rainfall, localized ponding and some scouring by flowing surface water may occur. However, those conditions typically dissipate as the water rapidly percolates through the substrate.

A portion of the airport is within the tsunami evacuation zone, as determined by City and State Civil Defense agencies. The project site is located outside of the tsunami evacuation zone (See Figure 3-6: Tsunami Hazard Map). The tsunami evacuation zone depicts estimated inundation limits for all coastal areas of Oahu using available historical data. The evacuation zone designation extends about 3,000 feet from the shoreline on the western boundary and tapers to about 2,000 feet on the eastern boundary. The evacuation zone is an advisory designation meant to foster tsunami preparedness.

Impacts and Mitigation Measures

In the short and long-term, no significant impacts are anticipated on flood hazards in the project area. The proposed improvements will not increase flood risks or cause any adverse flood-related impacts at the project site or at lower elevation properties. For development of the proposed facilities, all drainage improvements, excavation and grading will be coordinated with the appropriate agencies during permitting and

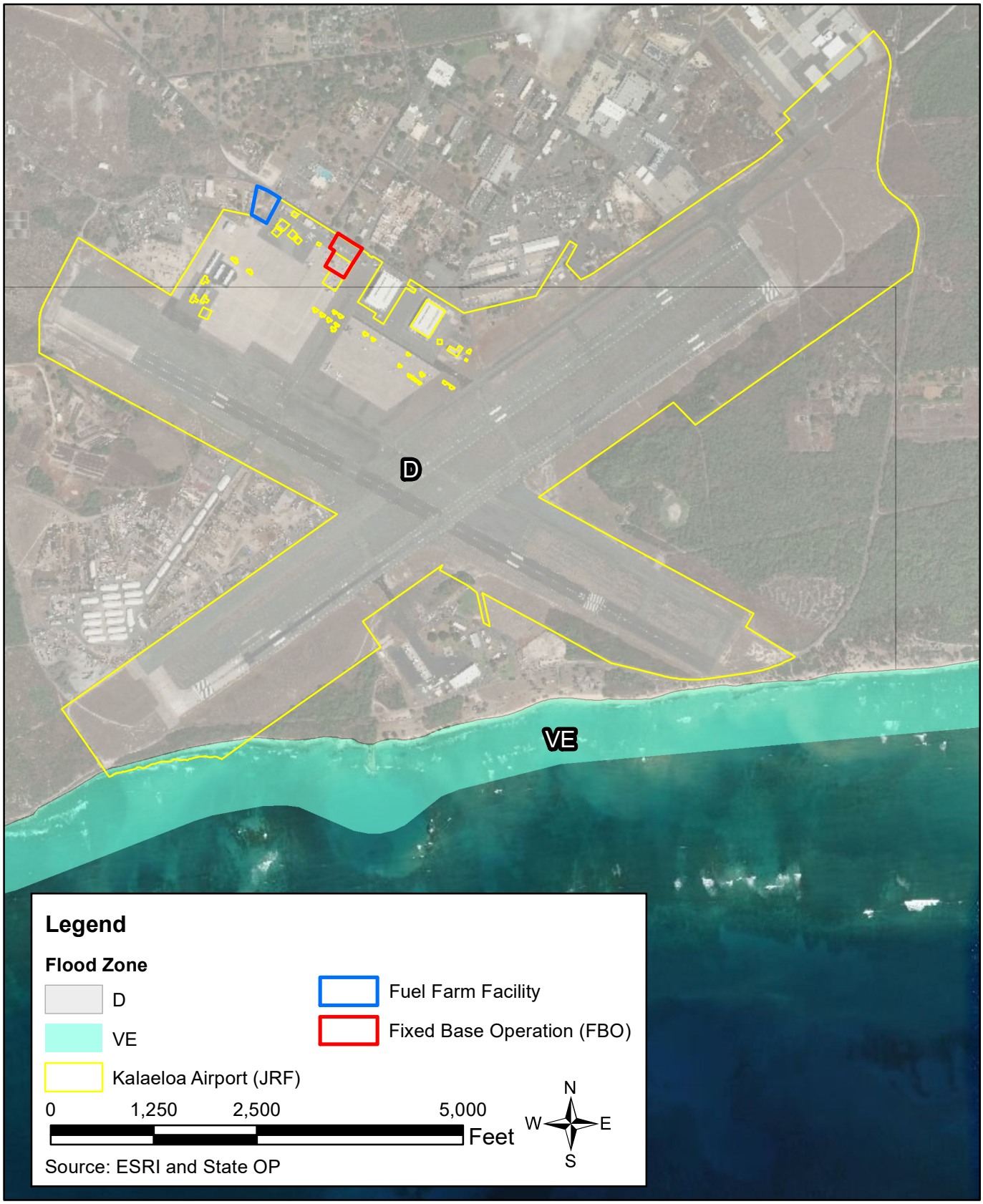


WILSON OKAMOTO CORPORATION

FIGURE 3-4

Sea Level Rise Exposure Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

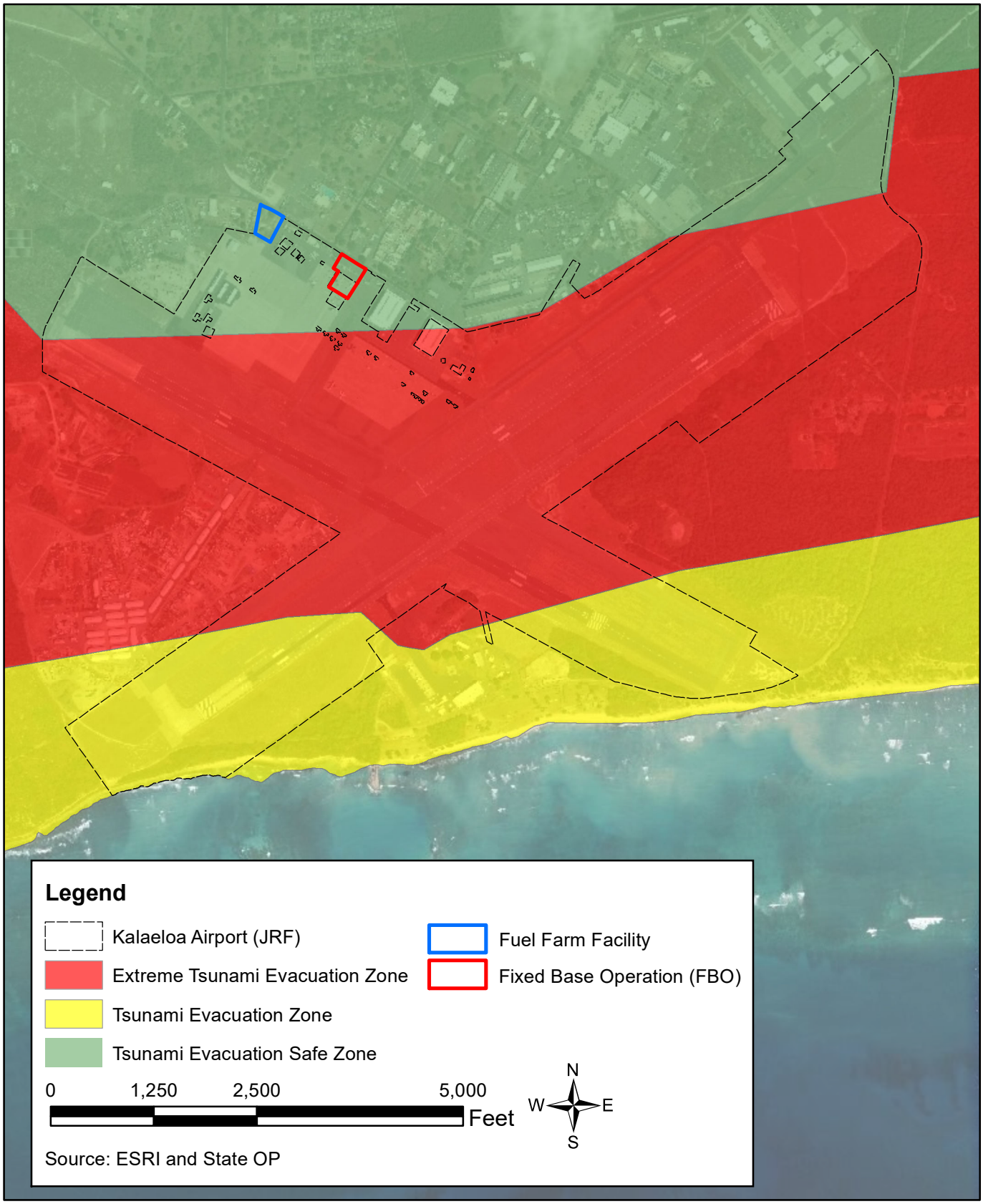


WILSON OKAMOTO CORPORATION

FIGURE 3-5

Flood Insurance Rate Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii



WILSON OKAMOTO CORPORATION

FIGURE 3-6

Tsunami Hazard Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

construction in order to ensure that implementation of the proposed action will not result in significant impacts regarding flood and tsunami hazards.

The proposed FBO site is located in an area that is already paved and, as such, no increase in runoff is anticipated as a result of its construction. The proposed Fuel Farm Facility site is located in an area of disturbed vacant land that is currently unpaved. Project improvements will include the construction of concrete pads and partial pavement of the site. It is anticipated that there will be a slight increase in runoff as a result. Therefore, permeable crushed rock is proposed to be used to the maximum extent practicable to minimize any increase in runoff.

The Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills.

3.4.3. Hurricane and Wind Hazard

The Hawaiian Islands are seasonally affected by Pacific hurricanes from the late summer to early winter months. The State has been affected twice since 1982 by significant hurricanes, Iwa in 1982 and Iniki in 1992. During hurricanes and storm conditions, high winds cause strong uplift forces on structures, particularly on roofs. Wind-driven materials and debris can attain high velocity and cause devastating property damage and harm to life and limb.

As a hurricane nears land, the surge of water, topped by battering waves, can move ashore along an area of the coastline into low lying coastal areas. Due to differences in atmospheric pressure, tidal stage, coastal topography, and location relative to the eye of the hurricane it is difficult to predict how hurricane-induced storm surge may impact a specific location. It is difficult to predict these natural occurrences, but it is reasonable to assume that future events will occur. The project site, however, is no more or less vulnerable than the rest of the island to the destructive winds and torrential rains associated with hurricanes.

Impacts and Mitigation Measures

The potential for hurricanes, while relatively rare, is present. To safeguard against hurricane damage, project improvements will be designed in compliance with American Society of Civil Engineers and IBC standards for wind exposure.

3.4.4. Seismic Hazard

The southern shoreline of Oahu lies within the Molokai Seismic Zone. This region of Oahu is classified as a 2A Seismic Zone under the Uniform Building Code (UBC). Zone 2A is characterized as having earthquakes that may cause minor damage to structures. Volcanic hazards in the area are considered minimal due to the extinct status of the former volcanoes.

Impacts and Mitigation Measures

Oahu has not experienced significant seismic events in the modern era. The proposed project improvements will meet prevailing building codes, which incorporate specifications to reduce vulnerability to earthquakes. Continued adherence and revision of local building codes while project is under construction will seek to mitigate any risk associated with seismic activity.

3.5. Natural Environment

3.5.1. Flora and Fauna

The project site is located in a highly altered urban environment. This area has been subject to intense anthropogenic activity over the past century. Thus, flora within the project site consists predominantly of common naturalized species that are regularly found in ruderal areas around the State.

The endemic akoko shrub (Chamaesyce skottsbergii var. Skottsbergi), a federally listed endangered species, occurs in an area east of JRF. There are no listed or candidate threatened, or endangered botanical species as set forth by the U.S. Department of the Interior Fish and Wildlife Service (USFWS) on the project site.

Mammalian species that may appear at the project site include the small Indian Mongoose, rats and feral cats and dogs. The project site is largely devoid of vegetation and surface water resources and does not constitute a desirable habitat for endangered or threatened bird species. It is possible that transient migratory species, such as the Pacific Golden Plover and Wandering Tattler, may appear at the project site, as the species regularly occur in other open coastal areas of Oahu. Other common bird species found throughout Oahu that may appear at the project site include Common Mynas, Red-Whiskered Bulbul, Zebra Doves, and House Sparrows.

None of these species is a listed or candidate threatened, or endangered species as set forth by the USFWS.

By letter dated March 3, 2021, the USFWS noted that listed threatened or endangered species most likely to occur within the vicinity of the project area based on the project location and description include the Hawaiian hoary bat, or ʻōoeʻapeʻa, (*Lasiurus cinereus semotus*) and Hawaiian stilt, or aeʻo (*Himantopus mexicanus knudseni*). However, HDOT-A conducted Wildlife Hazard Assessment (WHA) survey at JRF from June 2019 to May 2020, and not a single Hawaiian hoary bat was observed at JRF.

The Hawaiian hoary bat roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season, there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away. Additionally, Hawaiian hoary bats forage for insects from as low as 3 feet to higher than 500 feet above the ground and can become entangled in barbed wire used for fencing.

The Hawaiian stilt is considered a Hawaiian waterbird. Listed Hawaiian waterbirds are found in fresh and brackish-water marshes and natural or man-made ponds. Hawaiian stilts may also be found wherever ephemeral or persistent standing water may occur. Threats to these species include non-native predators, habitat loss, and habitat degradation. If a project creates, either purposefully or inadvertently, any kind of temporary or permanent standing water, including excavation or grading for construction or roadwork, then it may attract Hawaiian waterbirds to the site. In particular, the Hawaiian stilt is known to nest in sub-optimal locations (e.g., any ponding water), if water is present. Hawaiian waterbirds attracted to sub-optimal habitat may suffer adverse impacts, such as predation and reduced reproductive success, and thus the project may create an attractive nuisance.

Impacts and Mitigation Measures

Potential adverse impacts on flora and fauna are not anticipated. The project site is located within a highly altered urban environment. The proposed FBO site consists of a concrete aircraft parking apron that has no vegetation and will not be suitable for faunal species habitat. The proposed Fuel Farm Facility site is currently undeveloped and partially vegetated and consists of common naturalized species found in ruderal areas around the State. No threatened or endangered faunal species are known to utilize the area for habitat or foraging.

According to the USFWS, threatened or endangered faunal species could occur within the vicinity of the project area. Regarding the Hawaiian hoary bat, HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. In addition, the proposed FBO and Fuel Farm Facility sites are located in a pre-disturbed developed area on vacant land within the JRF property. There are no tall trees present within the project site and the proposed action will have no effect on tall trees located offsite that may be used by the Hawaiian hoary bat for habitat or foraging. Therefore, the Project will have no adverse effects to the Hawaiian hoary bat.

Regarding the Hawaiian stilt, there are no perennial streams, ponds, or other surface water resources on or within close proximity of the project site that could be used by waterbirds for habitat or foraging. Also, the proposed action will not involve creating habitat for waterbirds. Implementation of the proposed action is not likely to adversely affect federally protected species. In addition, no listed or protected plant species are present at project site. Other rare, threatened, or endangered fauna are not known to utilize the site for habitat or foraging purposes.

Construction activities may temporarily disrupt routine behavior of common faunal species in the immediate area of the project site, but will not result in permanent displacement, or adversely affect regional distribution of affected fauna. Once project activities are complete, faunal activity in the vicinity of the project site is expected to return to pre-existing conditions.

No adverse impacts resulting from the project are anticipated. However, measures to prevent adverse effects to protected seabirds from night lighting will include the following:

- During construction activities, all nighttime lighting will be shielded and angled downward to reduce glare and disruption of bird flight.
- Following construction, permanent light sources will be shielded and angled downward to eliminate glare that could disturb or disorient birds in flight.

3.6. Historic, Archaeological and Cultural Resources

Historic and Archaeological Resources: As part of the U.S. Navy's 1999 Final EIS, extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. The U.S. Navy FEIS documented 62 archaeological sites on surplus lands that are eligible for listing in the National Register of Historic Places (NRHP). None of these sites is located within JRF or the project site. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

In addition, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project.

Accordingly, the U.S. Navy FEIS also determined that a total of 12 individual structures within JRF were eligible for listing on the NRHP. They include the air traffic control tower (Building 4), two large hangars (Hangars 110 and 111), the current HDOT-A baseyard facility (Building 115), and a total of 8 ready magazines (7 adjacent to the hangars and one adjacent to Building 115). Since the time of the U.S. Navy's FEIS, the Air Traffic Control Tower, Hangars 110 and 111 have been placed on the National Register.

By letter dated February 9, 2021, John Bond (Historian) noted that there is a rare 1942 pillbox from the neighboring Marine Corps Air Station (MCAS) Ewa Field is currently stored at the proposed Fuel Farm Facility site.

Cultural Resources: The project site may have been used for ranching prior to intensive military use as part of the BPNAS beginning in the 1930's. According to the 1902 Hawaii Territory Survey map of Oahu by John M. Donn and Walter E. Wall, the project site and the surrounding airport area was previously used as grazing lands, which is presumed to be associated with

ranching activities. An area of land northeast of the project site was identified as being used for sisal (agave) plantations while the majority of land located north of the project site was used for sugar plantations. During the period of use by the U.S. Navy, the project site was developed as a concrete aircraft parking apron and to support ancillary activities, a use which continued until JRF was transferred to the HDOT-A.

The project site has been altered by historic and modern land use including grading and grubbing of perhaps 85 percent of the site. Based on information provided in the 2010 Final EA, ethnographic accounts and past archaeological investigations in the vicinity revealed that prior to extensive historic and modern land alteration, the project site would have possibly yielded the remnants of traditional Hawaiian temporary habitations used during forays for marine resources. Evidence of opportunistic seasonal agriculture and possibly burials would also have been likely. With the spread of Western land use in the 19th century, the project area may have been used for ranching as evidenced by the survey map showing the land as being used for grazing before the intensive military use.

The project site has been used for aviation and aircraft-related uses for 90 years or more. During this period, public access to the project site was controlled by the U.S. Navy. Further, all uses and activities were restricted to military purposes. Current use of the project site is limited by HDOT-A as authorized by HRS, Chapter 262-4(a) and permitted by HAR, Chapter 19-17.1, Small Plane Hangar Units and Tie-Down Spaces at Public Airports. Access to the project site is controlled by the HDOT-A and by assurances made by HDOT-A on behalf of the State of Hawaii to the FAA. HDOT-A and FAA policies limit the project site to aviation activities. The project site will be in a secured area and access will be for authorized personnel only; thus, traditional or cultural practices is not expected.

Located in the vicinity is the Kalaeloa Heritage Park, which consists of a 77-acre parcel with over 177 recorded cultural sites that consist of heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park.

Impacts and Mitigation Measures

There are no identified archaeological sites within the airport, however, three structures at the airport were placed on the National Register. The HDOT-A and the Applicant are working with the appropriate parties to ensure the safe relocation of the pillbox. Thus, development of the proposed action will not result in adverse impacts to archaeological resources.

The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If required, any studies or field inspections will be initiated, and the resulting report will be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.

Uses at the project site will be limited by the HDOT-A to activities permitted by HAR, Chapter 19-17.1, Small Plane Hangar Units and Tie-Down Spaces at Public Airports. Access to the project site is controlled by the HDOT-A and by assurances made by HDOT-A to the U.S. Department of Transportation, Federal Aviation Administration (FAA). HDOT-A and FAA policies limit the project site to aviation activities. Thus, the exercise of native Hawaiian rights, or any ethnic group, related to gathering, access or other customary activities will not be affected by the construction of the proposed action.

Based on the above, the potential for adverse direct, indirect, or cumulative project effects to traditional or contemporary cultural practices is not anticipated. Given the distance of the project site from the Kalaeloa Heritage Park and the continuation of existing uses within the vicinity, no impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action. However, because there is always the potential for the discovery of iwi or other cultural remains, any inadvertent finds will immediately result in the cessation of work and the immediate reporting of the find to the SHPD (Main Office, Oahu). SHPD will provide further instructions regarding the treatment of the find and the conditions when work may be resumed.

3.7. Air Quality

The DOH Clean Air Branch, monitors the ambient air quality in the State for various gaseous and particulate air pollutants, and is responsible for regulating and monitoring pollution sources to ensure that the levels of criteria pollutants remain well below the State and federal ambient air quality standards. The U.S. Environmental Protection Agency (EPA) has set national ambient air quality standards (NAAQS) for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), ozone (O_3), and particulate matter (PM_{10} and $PM_{2.5}$). Hawaii has also established a state ambient air standard for hydrogen sulfide (H_2S) related to volcanic activity on Hawaii Island. The primary purpose of the statewide monitoring network is to measure ambient air concentrations of these pollutants and ensure that these air quality standards are met.

Air pollution in Hawaii is caused by many different anthropogenic and natural sources. There are industrial sources of pollution, such as power plants and petroleum refineries; mobile sources, such as cars, trucks, and buses; agricultural sources, such as crop burning, and natural sources, such as windblown dust and volcanic activity.

The quality of air in the project area is good as no major air pollutant generators operate in the vicinity. No industrial incinerators, rock quarries, manufacturing plants, or mass drying beds occur. Moreover, there are no heavily used thoroughfares or busy intersections that generate extensive exhaust emissions from high vehicle volumes.

Impacts and Mitigation Measures

Fugitive dust will be controlled, as required, by methods such as dust fences, water spraying and sprinkling of loose or exposed soil or ground surface areas. As deemed appropriate, planting of landscaping will be done as soon as possible on completed

areas to also help control dust. Respective contractors will be responsible for minimizing air quality impacts during the various phases of construction.

Exhaust emissions from construction vehicles are anticipated to have negligible impact on air quality as the emissions will be relatively small and readily dissipate. In the long-term, some vehicular emissions related to operations at the project site are expected, however, due to the generally prevailing trade winds, the emissions will be readily dissipated.

Emissions from aircraft using JRF and from vehicle-trips related to airport activities will also be lower than historical emissions when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

3.8. Noise

The predominant source of noise at JRF is aircraft performing takeoff and landing operations. Noise levels range from over 80 DNL on and immediately adjacent to the runways, to 55 DNL approximately 8,000 feet from the sides of the runways (See Figure 3-7: Noise Contour Map). Several U.S. Navy housing and support facilities occur within the 60 DNL contour, which means the populations may be exposed to sound levels greater than 60 DNL.

The JRF Master Plan shows that between aircraft flyby events, background ambient noise levels are typically less than 55 dBA. These levels may decrease to levels less than 40 dBA during calm wind periods at locations which are removed from motor vehicle traffic, surf noise, or developed areas.

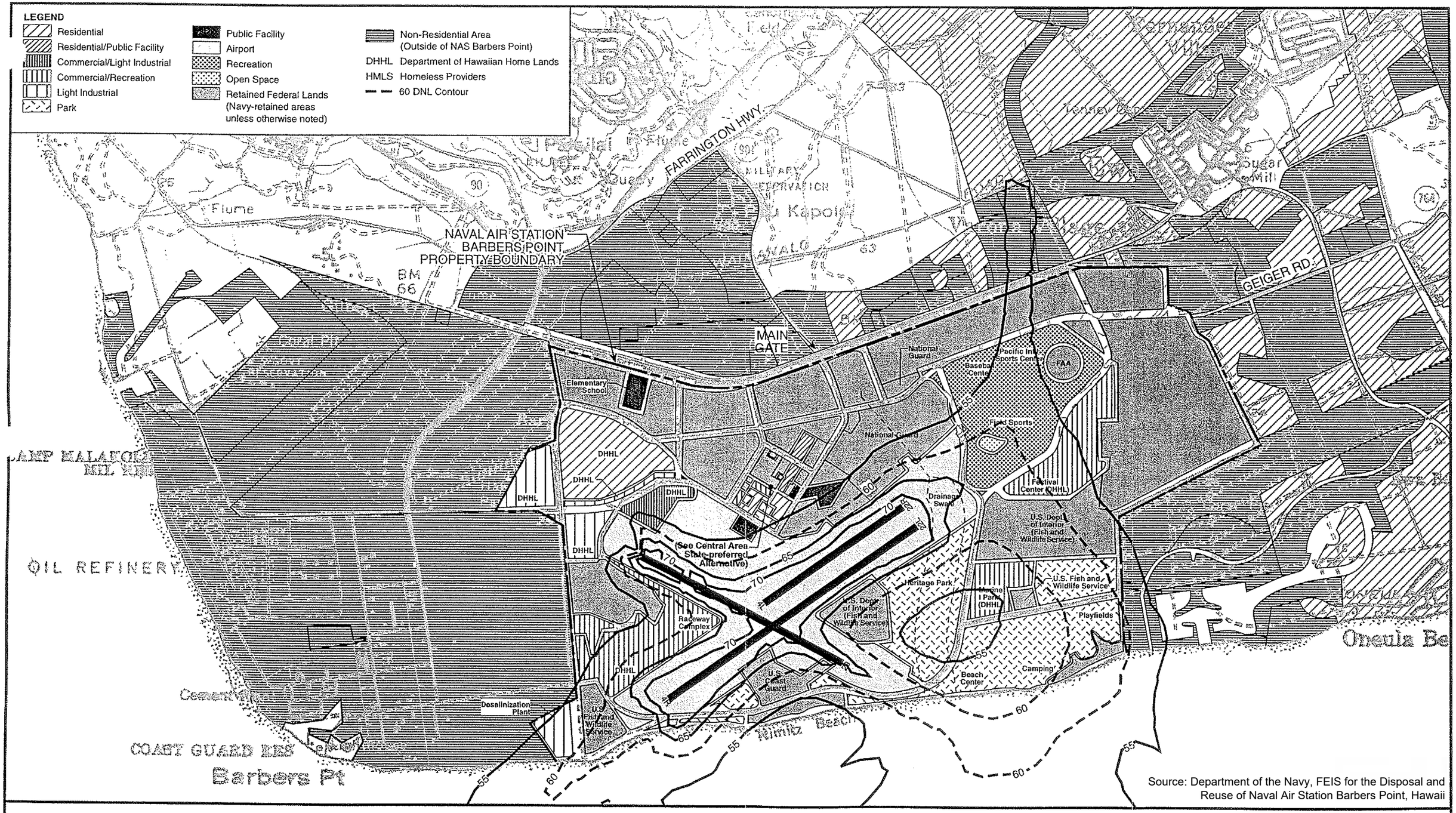
Impacts and Mitigation Measures

Construction activities such as grading, excavating for footings and foundations, and erecting the buildings will create noise during construction. The equipment used for these activities typically include pick-up trucks, excavators, graders, rollers, backhoes, concrete delivery trucks, water tank trucks, hydraulic cranes, and forklifts.

Noise generated by construction vehicles will be short-term during the period of construction. Once construction has been completed, the construction noise impact will no longer occur. Impacts from construction noise are not anticipated to be significant as the project site and much of the surrounding land uses are considered airport or industrial related.

Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is

442.0101/018-1 12.21.98



Source: Department of the Navy, FEIS for the Disposal and Reuse of Naval Air Station Barbers Point, Hawaii

0 300 600 1200
SCALE IN METERS
0 1200 2400 4800
SCALE IN FEET
NORTH

Sources: NASBP Land Use: Helber Hastert & Fee Planners (December 1997);
Federal Retention Areas: PACNAVFACENGCOM (September 28, 1998);
Land Use Outside of NASBP: The Estate of James Campbell, Kapolei Area Long Range Master Plan, October 1997;
Noise Contours: Aries Consultants Ltd. (March 1998);
Base Map: USGS Topographic Map of the Island of Oahu (1970).

FIGURE 3-7 Noise Contour Map

projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

3.9. Hazardous Materials

An environmental baseline survey was performed at the former BPNAS to identify contaminated and uncontaminated areas. The contaminated areas identified under the Community Environmental Response Facilitation Act of 1992 (CERFA), Pub. L. 102-426, were referred to as points of interest (POIs). Three sites consisting of 5 locations were located within the JRF property. Two sites consisting of 3 locations are located within the project site. According to the U.S. Navy FEIS, Hangar 110, Hangar 111, and Substation S110 were identified POIs within the JRF boundary. These POIs could potentially have released oil, solvents, or fuel.

One site located at the northwest boundary of the project site was identified as a transformer containing Polychlorinated Biphenyls (PCBs). The U.S. Navy FEIS indicates the sources have been either retrofitted (replaced with non-contaminated transformer) or retrofitted-replaced with a non-PCB dielectric fluid to flush out PCBs.

The other site consisting of 2 locations were located near Hangars 110 and 111. The U.S. Navy FEIS identified these sites as dry wells that pose no risk, and that dry well sediments exceeding hazardous waste levels were removed as part of the compliance program.

The proposed Fuel Farm Facility will provide storage for several types of fuel, including Jet A fuel, Avgas, diesel, and mogas. Although the liquid fuel is not explosive by itself, explosive conditions could be created if certain conditions within the fuel tank and an ignition source is present.

Impacts and Mitigation Measures

The proposed FBO will be subject to HAR, Chapter 19-17.1, Small Plane Hangar Units and Tie-Down Spaces at Public Airports. Specific sections of the rules relate to fire safety and flammable liquids, including paints, thinners, and solvents. HAR, Chapter 19-17.1, allows storage of flammable liquids if contained in approved closed metal containers of not more than five gallons. Further, use of these liquids will only be allowed in a designated area. The rules do not allow use of gasoline for the cleaning of aircraft or aircraft parts within hangars. Also, no person shall spray paints, dopes, solvents, primers, thinners, or similar flammable materials within a hangar. Waste oil and other flammable liquid waste shall not be kept in a hangar but shall be discarded in the receptacles provided for this purpose. These rules are to protect the project site

and surrounding areas from adverse impacts from use of the hazardous and flammable materials.

In addition to the foregoing, DOT-A also has a BMP Field Manual for Operations at the State of Hawaii Airports that will be applicable to the proposed airport facilities. The Manual outlines requirements for tanks and the storage of drums or smaller quantities of products. These requirements include, but are not limited to, secondary containment and labeling.

For the mitigation of potential hazards associated with the storage of fuel, the facility design will utilize primary and secondary containment of fuel per the relevant state and federal requirements by utilizing double-wall tanks, curbed containment for the tanks and fuel transfer areas, and an oil/water separator to collect and treat stormwater. The design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA 103 – Standards for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. In addition, all line personnel are trained and certified per ATA 103 and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained. Furthermore, the Fuel Farm Facility will be subject to EPA SPCC Rule CFR Part 112 regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements.

JRF includes a baseyard and aircraft rescue and firefighting facilities with a total of seven aircraft firefighting vehicles and vehicle fueling facilities. Vehicles and equipment assigned to JRF are maintained at JRF and the main baseyard located at HNL. However, the aircraft firefighting vehicles and other vehicles and equipment are fueled at JRF.

JRF has an extensive system of drainage injection wells located throughout the airport property, including additional ones which were constructed by the U.S. Navy and a swale/trench located north of the Coast Guard facility. Sheet flow is carried by a series of inlets and pipes to this swale/trench which contains a network of dry wells located within the base of the swale/trench.

The network of dry wells has been designed to capture and drain variable storm event volumes. The dry wells have been approved by the DOH Safe Drinking Water Branch as part of the Underground Injection Control (UIC) program. In addition, the sandy loam soil underlying most of the airport effectively drains surface groundwater flows into the ground via infiltration, such that flows do not discharge to State waters.

3.10. Traffic

The main entrance to the airport is from the north via Fort Barrette Road, an arterial road, which connects to the H-1 Freeway, the main regional thoroughfare in the area. Fort Barrette Road intersects with Franklin D. Roosevelt Avenue (which runs along the entire northern

boundary of the former BPNAS). Fort Barrette becomes Enterprise Road south of Franklin D. Roosevelt Avenue and continues onto the entrance of JRF.

The existing roadways surrounding the airport were constructed by the U.S. Navy and have been used by the State since closure of the former BPNAS. Roads that were transferred to the HDOT-A include Franklin D. Roosevelt Avenue, West Perimeter Road, Enterprise Street, Coral Sea Road, and a right-of-way for a future connection with the North-South Road.

Roads transferred to the City include Saratoga Avenue, Independence Road, Tripoli Road, Yorktown Street, Shangri-La Street, Midway Street, Lexington Street, Hornet Street, Copahee Avenue, Boxer Road, and several right-of-ways for road extensions.

Vehicle parking is available in a lot adjacent to the air traffic control tower, in a large lot near Hangar 110 and Hangar 111, and smaller lots along Midway Street.

Public transportation in this region is primarily provided by the City's TheBus system of fixed routes, transit hubs, and the HandiVan special services. A transit hub has been created in Kapolei. The transit hub is connected by TheBus to the transit hub in Ewa, with a limited number of transit stops along Roosevelt Road in Kalaeloa. Additionally, a transit route currently services the downtown area in Kalaeloa with a stop at Yorktown and Enterprise Street. Service however is infrequent and limited to one stop in the morning and one stop in the evening.

Bus service is provided into the JRF area by the City's TheBus by Route 415. This route enters the former BPNAS property at the intersection of Roosevelt Avenue and Fort Barrette Road and forms a loop along Enterprise Street, Yorktown Street, Lexington Street and Saratoga Avenue. Yorktown Avenue lies one block north of Midway Road, the northern boundary of JRF.

A new rapid transit rail line is also being constructed to link the Ewa region with central Honolulu.

Impacts and Mitigation Measures

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm Facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the Fuel Farm Facility by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Storage capacity of the Fuel Farm Facility in the near future is 90,000 gallons for Jet A with the potential for up to 240,000 gallons, plus approximately 30,000 gallons in aircraft refueler trucks. The Fuel Farm Facility capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the Fuel Farm Facility will be sufficient to allow adequate fuel storage to

service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

The City bus system is available for travel to JRF. With the ongoing pandemic brought on by COVID-19, use of the bus system is difficult to determine at this time. The project is not expected to create significant adverse effects to the City bus system.

There are currently no plans to improve Midway Street or Lexington Street as part of the proposed action. Proposed roadway improvements are limited to providing driveway access from the Kalaeloa Airport to Midway Street. It should be noted that the project site is within the JRF under the jurisdiction of the HDOT-A and is within the greater KCDD under the jurisdiction of the HCDA. Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine whether any roadway improvements may be required.

3.11. Visual Resources

Hawaii's visual resources are important to the state's tourism industry and the quality of life enjoyed by the State's residents. The State's visual resources include a broad range of natural and developed areas and a tremendous variety of land uses, water bodies, and vegetation types. These visual resources also include urbanized areas that range from small rural towns to the metropolitan center of Honolulu.

No major scenic view planes can be found within the vicinity of the project site. The project site is a relatively flat concrete aircraft parking apron. The project site has no vegetation and does not have any significant aesthetic features. The project site is south of Midway Street, the main roadway that provides access to the western and southern portions of the airport. The general visual character of the airport reflects industrial and former military use of the lands. The facilities and structures are functional, without extensive enhancements to the exterior finishes or features.

Impacts and Mitigation Measures

No short- and long-term significant impacts are anticipated on visual resources. The structures associated with the proposed action will be similar in character and massing to other existing structures at the airport.

The primary visual impact of proposed action will be to the general public who visit the JRF. The closest public roadway is Midway Street which forms the northern boundary of the Airport. Proposed facilities will be adjacent to the roadway.

3.12. Socio-Economic Characteristics

As referenced previously, Kalaeloa is situated within the Ewa region of the City and bounded by residential development to the north and east, and by the James Campbell Industrial Park to the west. Communities in the region, consisting of predominantly single-family residences, include Kapolei, Makakilo, Honokai Hale, Ewa Beach, Ewa by Gentry, Ewa Villages, Ocean

Pointe, and other single and multifamily developments. Commercial areas, schools, and parks support the residential neighborhoods. The northeastern corner of Kalaeloa is adjacent to the Honouliuli Wastewater Treatment Plant. The State's Kalaeloa Harbor and the Ko Olina Resort are located west of the James Campbell Industrial Park. The recently constructed University of Hawaii, West Oahu campus is located north of Kalaeloa in the eastern portion of Kapolei.

There is an established residential community in Kalaeloa that rents apartments and homes that were once a part of the Marine Corps Air Station Ewa. The Kalaeloa Professional Center is home to various businesses and services, including a U.S. Army Medical Clinic. Additionally, the FBI, Army National Guard, USCG, and JRF, are all government agencies located in Kalaeloa that provide jobs for the community. Kalaeloa is also home to businesses that include K-1 Speed Hawaii and the Coral Crater Adventure Park catering to active families. White Plains Beach is a family friendly beach and is used for surfing. Military Morale, Welfare and Recreation (MWR) program facilities are located near the coastline.

Much of the Ewa region was once dedicated to the cultivation of sugar cane up until the closure of the Oahu Sugar Company in the early 1990s. During the 1990s, the cane fields yielded to newly constructed homes with much of the new development east of Kalaeloa along Fort Weaver Road. The region is now home to approximately 70,000 people, while the larger Leeward Oahu area (Ewa, Central Oahu, North Shore and Waianae) has nearly 300,000 residents. The Ewa region is growing into a new urban center and is the location on Oahu most likely to accommodate population growth. While the Oahu-wide population increase is forecasted at 1.6 percent annually, Ewa could experience a 3.6 percent average annual growth rate. Of the 200,000 additional residents expected on Oahu (between 2000 and 2025), about 30 percent are expected to live in the Ewa region. The City's Ewa Development Plan envisions the resident population to grow over 164,000 by the year 2035.

Tourism is the primary economic engine of Oahu, but the public sector also plays a major role in the island's economy. According to the Hawaii Tourism Authority, in 2019, the total number of visitors to Oahu was 10,386,673, an increase of 5 percent from 2018. Total spending by visitors to the Hawaiian Islands gained 1.1 percent to a new high of $17.84 billion.

According to the U.S. Census American Community Survey, median household income in the Site census tract was estimated at $86,085 (in 2014) and per capita income was $22,235 (in 2014). Median household income in Honolulu County was $91,139 and per capita income was $30,735.

Impacts and Mitigation Measures

The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.

In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.

The Applicant intends to hire all employees locally with one possible exception. That is if a qualified, experienced General Manager cannot be hired, then the Applicant will go beyond Oahu, beginning with the other Hawaiian Islands before resorting to the mainland for recruiting.

Combined with other past, present, and reasonably foreseeable future actions the proposed action will support the local economy and anticipated increased area population. Because population growth on Oahu is anticipated to occur with or without implementation of the proposed project no significant adverse cumulative impacts to the socio-economic environment are anticipated.

3.13. Public Services and Facilities

3.13.1. Police, Fire, and Medical Services

Police: The Honolulu Police Department (HPD)'s Kapolei police station is located at 1100 Kamokila Boulevard. The project site is in Patrol District 8, Sector 2. As of March 2020, HPD had 1,820 sworn officers (HPD, 2021).

Fire: Fire prevention, suppression, and protection services for all of Oahu is provided by the Honolulu Fire Department (HFD). The project site is located nearest the Kapolei Fire Station. In 2020, the HFD employed over 1,100 firefighters (HFD, 2020.)

Medical: The nearest major medical facility is the Queen's Medical Center West Oahu, a 7.2-mile drive from the project site. Emergency medical service is provided by the City and County of Honolulu Emergency Services Department, Emergency Medical Services Division. This facility provides emergency care as well as clinic specialty services, generally excluding General Medicine and Family Practice. The largest hospital on the island is The Queen's Medical Center on Punchbowl Street, with 505 small care beds and 28 sub-acute beds. Queen's at Punchbowl is the only Level II trauma center in the Pacific Region and provides emergency, primary, and specialized care. Any trauma patients are transferred to Queen's, approximately six miles from the project site (The Queen's Medical Center, 2013). In addition, numerous privately operated medical/dental clinics and offices are located in the area to serve the local population.

Impacts and Mitigation Measures

Police: The proposed action will not result in an increase in demand for police protection services. No direct, secondary or cumulative impacts to police protection are anticipated or expected, and no mitigation measures are necessary or recommended.

Fire: The proposed action will not result in an increase in demand for fire protection services. The proposed improvements will comply with Kalaeloa Community Development Plan and all applicable CCH design standards to meet health and fire safety requirements, including the provision of fire apparatus access roads that meet county requirements and an accessible and reliable water source. The water supply and routing systems for the proposed action are being designed in accordance with all applicable Kalaeloa Community Development Plan and CCH standards. No direct, secondary, or cumulative impacts on fire protection are anticipated or expected, and no mitigation measures are necessary or recommended.

Medical: The proposed action will not result in an increase in demand for health and emergency services. No direct, secondary or cumulative impacts on emergency services are anticipated or expected, and no mitigation measures are necessary or recommended.

3.13.2. Education

The project site is within the Leeward Oahu school district, in the Campbell-Kapolei Complex area. In addition to two high schools, the complex includes 12 elementary schools and three intermediate schools. The Barbers Point Elementary School is located near the project site with 540 students enrolled in the 2018-2019 school year (DOE, 2019).

There are two private schools in Kapolei, the American Renaissance Academy and Island Pacific Academy, which enrolled 87 and 483 students, respectively, in 2014-2015 according to the Hawaii Association of Independent Schools website. Kapolei Charter School by Goodwill Hawaii serves 49 students throughout grades 9 through 12 and is located 0.3 mile west of the western portion of the project site (DOE, 2019).

Further, higher education institutions in proximity to the project site include the University of Hawaii, West Oahu, which enrolled 3,128 undergraduate students in 2018, and the Hawaii Tokai International College, which enrolled 158 undergraduate students in 2016 according to their websites. Both are located approximately 2.8 miles northeast of the project site. There are two public libraries in the vicinity, Kapolei north of the project site, and Ewa Beach to the east near the James Campbell High School.

Impacts and Mitigation Measures

The proposed action is not anticipated to impact any schools or libraries. The project is not anticipated to obstruct or hinder access to nearby educational facilities, including the Barbers Point Elementary School. The proposed action will not increase nor decrease the provision of educational services to the community, and will not directly, secondarily, or cumulatively result in an increase in the area population, which would otherwise generate the need for school services.

3.13.3. Recreational Facilities

A wide range of recreational opportunities are present in the greater Kalaeloa / Kapolei Region. Specifically, the following recreational facilities are identified as within the general proximity of the JRF and the project site:

Regional Recreational Facilities:

- Barbers Point Beach Park
- Barbers Point Golf Course
- Kapolei Community Park People's Open Market
- Kapolei High School Farmer's Market
- Kapolei Community Park
- Kapolei Regional Park
- Kamokila Community Park
- Ko Olina Beach Park
- Makakilo Neighborhood Park
- Mehana Neighborhood Park
- Nimitz Beach Park/Kalaeloa Beach Park
- Pearl Harbor National Wildlife Refuge
- Pointer Fields
- Pride Fields

The majority of these recreational venues are available for use by the general public. The parks and baseball fields are owned and managed by the CCH Department of Parks and Recreation (DPR). DPR is currently under a licensing agreement with the U.S. Navy for the Pointer and Pride Fields and the Nimitz Beach Park/Kalaeloa Beach Park, while the CCH owns the other parks listed above. The Pearl Harbor National Wildlife Refuge is owned by the U.S. Fish and Wildlife Service and allows restricted, escorted public access. The 2013 Ewa DP envisions a future Kapolei Neighborhood Park approximately 1.1 miles north east and Kalaeloa Regional Park approximately 1.5 miles south and southeast of the project site. The park will anchor the Ewa Open Space and Greenways Network proposed in the Ewa DP.

Impacts and Mitigation Measures

The proposed action will not result in an increase in demand for nor interrupt the operation of recreational services or facilities. Consequently, no direct, secondary, or cumulative impacts on recreational facilities are anticipated or expected, and no mitigation measures are necessary or recommended.

3.13.4. Solid Waste Collection and Disposal

Solid waste collection and disposal service is provided by the City and County of Honolulu's Department of Environmental Services (ENV) and numerous private companies. Solid waste collected in the Honolulu area is hauled to the Campbell Industrial Park H-POWER Plant for incineration that generates electricity, followed by disposal of ash and non-combustibles at the Waimanalo Gulch Sanitary Landfill. Construction and demolition material is disposed of at the privately-owned PVT landfill in Waianae.

Impacts and Mitigation Measures

No short or long-term significant impacts to municipal solid waste collection and disposal facilities are anticipated as a result of the construction and operation of the proposed project.

Short-term impacts are anticipated in the form of construction debris that will be generated requiring disposal. The construction contractor shall be responsible for the proper disposal of construction debris at a CCH-approved disposal site. In accordance with HAR, Chapter 11-58.1, Solid Waste Management Control. No secondary or cumulative impacts to solid waste facilities will occur from the implementation of the proposed action.

3.14. Infrastructure and Utilities

3.14.1. Water System

The water distribution system at JRF is currently served by Hawai'i Water Service, a subsidiary of California Water Service Group, which completed the acquisition of Kalaeloa Water Company, LLC from the Hunt Companies Inc. in November of 2020 and has since began providing water and wastewater service to the Kalaeloa Area. Hawai'i Water Service serves all facilities at JRF. The City and County of Honolulu Board of Water Supply does not serve JRF.

According to the JRF Master Plan, the Barbers Point Well, the primary source of potable water used at JRF, is located approximately three miles north of the airport. This well has the capacity to pump approximately 4.6 million gallons per day.

There are two reservoirs located approximately two miles from the Airport each with a capacity of 1.0-million gallons. Water from the wells is chlorinated and fluoridated in a small structure located near the reservoirs prior to transmission and distribution.

Water is conveyed from the reservoirs to JRF by a 24-inch diameter transmission main. The potable distribution system consists of underground pipes ranging from 6 inches to 24 inches.

Impacts and Mitigation Measures

Water service to the project will be provided by the Hawai'i Water Service and conveyed through existing infrastructure on site. Proposed action water demands are not anticipated to be significant, and no major improvements to existing water system infrastructure will be required.

3.14.2. Wastewater System

Wastewater from the airport is collected by a system of gravity sewers and wastewater pump stations and conveyed to the City and County of Honolulu's nearby Honouliuli Wastewater Treatment Plan (WWTP) for treatment and disposal. The wastewater is handled by Hawai'i Water Service.

Impacts and Mitigation Measures

Wastewater generated by the project will be conveyed for treatment and disposal via existing wastewater conveyance infrastructure on site operated by Hawai'i Water Service. As such, no new connections to the City's wastewater system are being proposed. However, a Site Development Division Master Application Form for Sewer Connection may be required for the proposed discharge to the municipal sewer system. The Applicant will continue to coordinate with the appropriate agencies to determine whether a sewer connection application may be required for the subject project.

Wastewater generated by the proposed action improvements is anticipated to be minimal in comparison to the available capacity of the system that serves JRF. Consequently, the proposed action is not expected to significantly impact wastewater system infrastructure in the region. Infrastructure capacity will be addressed during project design and construction by the applicant and relevant agencies and organizations.

3.14.3. Drainage System

For the most part, surface runoff at JRF is currently handled through an extensive system of swales, underground pipes, and dry wells. With the exception of small amounts of runoff that may enter the Pacific Ocean as overland flow, storm flows from the airport are disposed of entirely onsite. The 1994 Environmental Baseline Survey conducted as part of the Navy's CLEAN (Comprehensive Long-Term Environmental Action Navy) Program estimated that the existing stormwater disposal system consists of over 200 dry wells. These consist of bored or drilled shafts ranging from 8 inches to 8 feet in diameter and having depths of 6 to 60 feet.

According to the JRF Master Plan, stormwater runoff and washdown water from Hangar 110, Hangar 111, and the former underground fuel farm near Taxiway P enter catch basins that are then piped underneath the runways and discharged to an earthen stormwater drainage ditch north of the USCG facility on the south side of the runways. Water discharged to the drainage ditch reportedly either enters the dry wells located in the bottom of the trench or infiltrates the ground surface.

The DOH Safe Drinking Water Branch manages and controls the UIC program. The purpose of the UIC program is to protect the quality of Hawaii's underground sources of drinking water from chemical, physical, radioactive, and biological contamination that could originate from injection well activity. Underground injection control drainage wells collect stormwater runoff which infiltrates into the groundwater aquifer. DOH Administrative Rules, Title 11, Chapter 23 provides conditions governing the location, construction, and operation of drainage injection wells, which only allows for stormwater discharges into the drainage wells to prevent pollutants from migrating and impacting underground sources of drinking water. The DOH uses a UIC line to identify locations where underground injection wells will be allowed. Sites below (makai) of the UIC line are allowed to use injection wells to dispose surface runoff, as the underlying aquifer is not considered drinking water source. JRF, including the project site, is located below (makai) the UIC line.

Impacts and Mitigation Measures

The Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

The Stormwater Program for Municipal Separate Storm Sewer Systems (MS4) is designed to reduce the amount of sediment and pollution that enters surface and ground water from storm sewer systems to the maximum extent practicable. Stormwater discharges associated with MS4s are regulated through the use of National Pollutant Discharge Elimination System (NPDES) permits.

Phase II of the MS4 program, issued in 1999, requires regulated small MS4s in urbanized areas, as well as small MS4s outside the urbanized areas that are designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges. Generally, Phase II MS4s are covered by a general permit. Each regulated MS4 is required to develop and implement a stormwater management program to reduce the contamination of stormwater runoff and prohibit illicit discharges.

Based on the digitized maps issued by the EPA for the 2000 Census, JRF is not identified to be within a defined urbanized area pursuant to the MS4 program definition. Additionally, JRF's pervious terrain of sandy-loam, its installed structural drainage system of swales and extensive UICs wells, effectively impounds surface flows and eliminates discharges to the receiving water (Pacific Ocean, Marine, Class A waters). For these reasons, JRF obviates the need for a MS4 NPDES permit.

A NPDES permit for stormwater discharges related to project construction activities will be required as individual and/or cumulative soil disturbances at the project site will exceed one acre of land area. The permit requires a Stormwater Pollution Prevention Plan (SWPPP) to document the measures that will be taken to prevent stormwater runoff from construction activities. Prior to construction, preparation of an erosion control plan and installation of BMPs is also required and will be inspected by HDOT-A's third-party inspector to ensure that all BMPs measures are properly installed per the SWPPP and plan drawings, and that all required documentation and permits are in place prior to excavation activities. These BMPs will be inspected routinely during construction and will be completely removed once it is confirmed that the area is fully stabilized, after construction.

All discharges related to the project construction or operation activities must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation.

In addition, the proposed action may be required comply with the City's prevailing soil erosion and water quality standards ("Rules Related to Water Quality"). However, the project site is within the existing JRF under the jurisdiction of the HDOT-A and is within the greater KCDD under the jurisdiction of the State's HCDA. Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine any City soil erosion and water quality standards that may be applicable to the subject project.

If required, under the City's Rules Related to Water Quality, projects that disturb more than one (1) acre of land are classified as Priority A projects.

Priority A projects are required (unless determined to be infeasible) to:

- Incorporate appropriate Low Impact Development (LID) site design strategies to the "maximum extent practicable" (MEP).

- Incorporate appropriate Source Control BMPs to the MEP.

- Retain onsite by infiltration, evapotranspiration, or harvest/reuse as much of the water quality volume (WQV) as feasible with appropriate LID Retention Post-Construction Treatment Control BMPs.

- Biofilter any portion of the WQV that is not retained onsite with appropriate LID Biofiltration Post-Construction Treatment Control BMPs.

If it is determined to be infeasible to retain and/or biofilter the Water Quality Volume, the City rules require the project to:

- Treat (by detention, filtration, settling, or vortex separation) and discharge with appropriate Alternative Compliance Post-Construction Treatment Control BMPs, any portion of the WQV that is not retained onsite or biofiltered.

- Retain or biofilter at an offsite location, the volume of runoff from a non-tributary drainage area equivalent to the difference between the project's WQV and the amount retained onsite or biofiltered.

Appropriate BMP measures include but are not limited to: infiltration basins and trenches, subsurface infiltration systems, dry wells, bioretention basins, permeable pavement, green roofs, vegetated bio-filters, enhanced swales, detention basins, sand filters, vegetated swales and buffer strips. If required, compliance with the Rules Relating to Water Quality will be verified at the time that plans are submitted to DPP for review.

3.14.4. Electrical and Communication Systems

Electrical power on the island of Oahu is provided by Hawaiian Electric Company (HECO). A significant electrical source for the project area is the Downtown Power Plant.

Electrical power for JRF likewise is provided by HECO through a distribution system consisting of overhead and underground lines. The primary distribution is via 11.5 KV, 3-phase circuits. Transformers at various locations reduce this voltage to 120/240 volt single-phase, three-wire circuits used to supply individual structures. HECO's generating capacity and the transmission and distribution system is adequate at the present time, although the area experiences occasional brown outs during heavy rain events and during routine and regular operations.

Telephone service in the area is provided by Hawaiian Telcom.

Spectrum is the local CATV provider in the region.

Impacts and Mitigation Measures

In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations. As such, HECO has been apprised of the proposed action and will continue to be consulted with during the planning and design process. It is anticipated HECO will evaluate the project's impact on their system as it develops. No significant impact from the project on electrical service is anticipated.

CHAPTER 4: RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS

4. RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS

This section discusses the relationship of the proposed action to State and County land use plans, policies, and controls.

4.1. State Land Use Plans and Policies

4.1.1. Hawaii State Plan

The Hawaii State Plan, Chapter 226, HRS, as amended, sets forth a plan that serves as a guide for the future long-range development of the State. It identifies the goals, objectives, policies, and priorities for the State; provides a basis for determining priorities and allocating limited resources, such as public funds, services, human resources, land, energy, water, and other resources; improves coordination of federal, state, and county plans, policies, programs, projects, and regulatory activities; and establishes a system for plan formulation and program coordination to provide for an integration of all major state, and county activities. Development of the proposed action supports and is consistent with the following State Plan goals, objectives and policies:

> *Section 226-4 State goals.*
>
> > *(1) A strong, viable economy, characterized by stability, diversity, and growth that enables the fulfillment of the needs and expectations of Hawaii's present and future generations.*
>
> **Discussion:**
> Several opportunities exist for new economic development and employment opportunities in Kalaeloa given its relatively large amount of developable land, functioning airfield, and location within the Ewa region. The airport at Kalaeloa is envisioned as a prime economic driver, creating jobs and providing services as population in the region continues to grow.
>
> Ultimately JRF will continue as a GA airport and as a reliever to HNL. However, in its current capacity, JRF is relatively limited in its ability to support aircraft operations. Following improvements to the airfield, greater use of the airport can be achieved allowing for use of the surrounding lands for aviation related development pursuant to master plans for the area. Aviation related development includes fixed based operators, training centers, and other GA related activities. The proposed action will serve GA uses at JRF, consistent with these aims.

Section 226-17 Objectives and policies for facility systems – transportation.

(b) (6) Encourage transportation systems that serve to accommodate present and future development needs of communities.

Discussion:

Since the concept of the second city in Kapolei, it has long been understood that facilities will be required to support the projected growth in population in the Ewa region. As the second urban center continues to grow, facilities to accommodate a variety of activities, including aviation activities will become increasingly important as the area develops. The proposed action will serve GA uses at JRF, consistent with these aims.

4.1.2. 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 that are best suited to the public health and welfare of Hawaii's people. Under Chapter 205, HRS, all lands in the State of Hawaii are classified by the State Land Use Commission (LUC) into one of four major categories of State Land Use Districts. These districts are identified as the Urban District, Agricultural District, Conservation District, and Rural District. Permitted uses within these districts are prescribed under Title 12, Chapter 205 (Land Use Commission), HRS, and the State Land Use Commission's Administrative Rules prescribed under Title 15, Subtitle 3, Chapter 15 HAR.

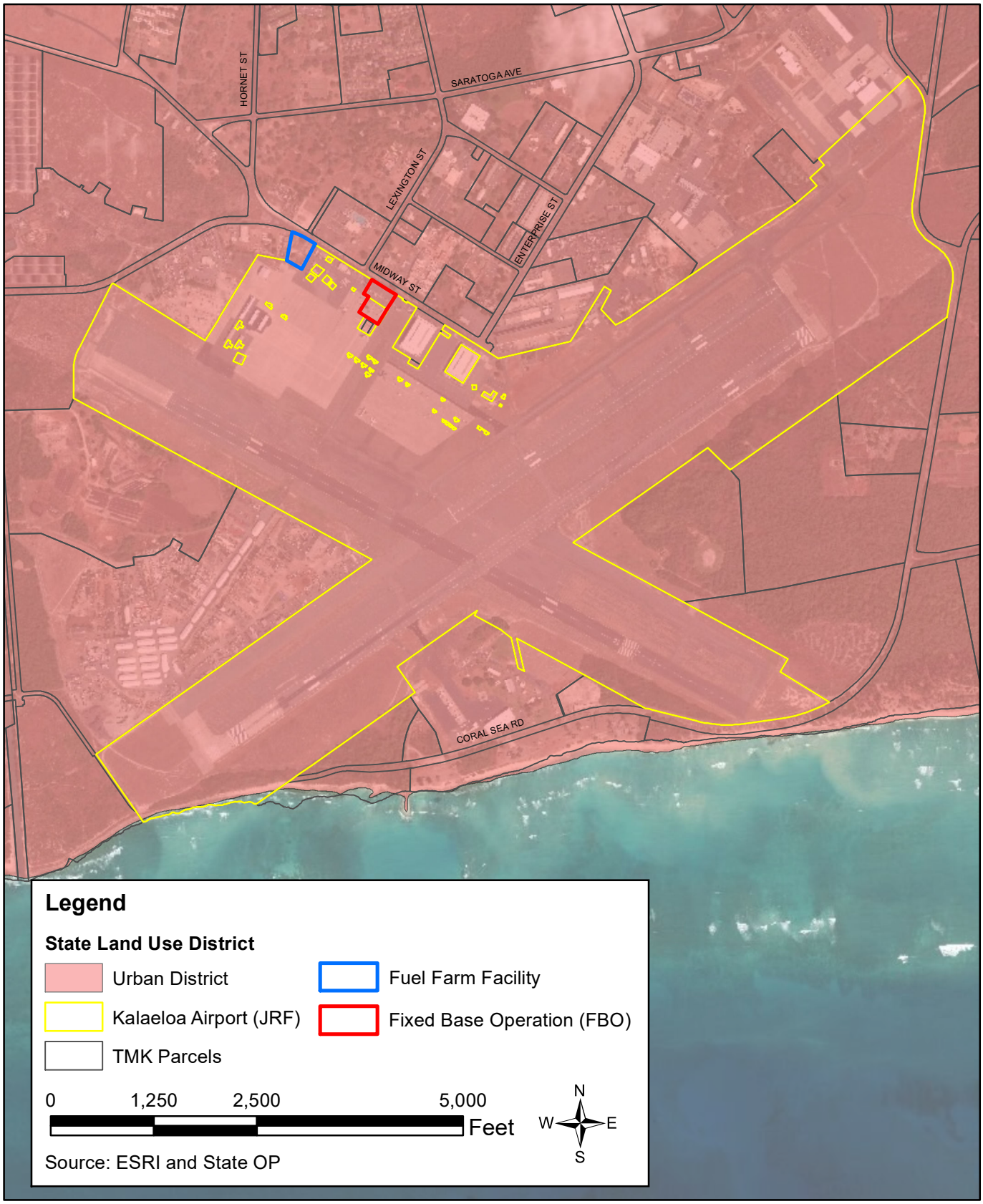
Discussion:

The project site is situated entirely within the Urban State Land Use District (See Figure 4-1: State Land Use District Map). Urban District lands generally include lands characterized by "city-like" concentrations of people, structures, and services. This District also includes vacant areas for future development. Jurisdiction of Urban Districts lie primarily with the county. In general, lot sizes and uses permitted in the district area are established by the county through ordinances or rules. The purpose and intent of the proposed action are consistent with the Urban State Land Use District.

4.1.3. State of Hawaii, Hawaii Community Development Authority Kalaeloa Master Plan

In 1999, the Barbers Point Naval Air Station was closed, and the process of transferring the Navy lands to civilian control began. In 2000, the Kalaeloa Redevelopment Plan was prepared by the Barbers Point Naval Air Station Redevelopment Commission and accepted as the Kalaeloa Special Area Plan by the City Council (Res. 01-86, April 2001).

In July 2002, Act 184 of the 2002 Hawaii State Legislature (SB 2702, SD2, HD2, CD1) transferred redevelopment responsibility for Kalaeloa from the Barbers Point Naval Air Station Redevelopment Commission to the Hawaii Community Development Authority (HCDA).



WILSON OKAMOTO CORPORATION

FIGURE 4-1

State Land Use District Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

HCDA assumed responsibility for redevelopment of Kalaeloa, overseeing remaining conveyances, contract administration, promulgation of administrative rules, and other tasks related to the Redevelopment Commission. In March 2006, HCDA prepared the Kalaeloa Master Plan to guide the future redevelopment of Kalaeloa. This Master Plan serves as an amendment to the Kalaeloa Community Redevelopment Plan prepared as part of the U.S. Navy's Base Realignment and Closure process. Doing so allows the Kalaeloa Community Redevelopment Plan to retain its statutory function as the principal policy and planning document for HCDA's use in coordinating with federal, state, and county government agencies, developers, private landowners, and the community. The Master Plan was approved by the HCDA Board and the Governor in March of 2006. Presently, the City's Ewa Development Plan identifies Kalealoa as a Special Area Plan that replicates the original community Redevelopment Plan adopted in 1996.

The HCDA has zoning and land use jurisdiction over this project. Implementation of the proposed action will require a development permit subject to the approval of the HCDA.

Discussion:

According to the Kalaeloa Master Plan, JRF is envisioned as a prime economic driver, creating jobs and providing services as population in the region continues to grow. To this end, HDOT-A is in the process of improving JRF's infrastructure to attract general aviation tenants. The proposed action is consistent with the airport uses identified in the Kalaeloa Master Plan. Implementation of the proposed action will require a development permit subject to the approval of the HCDA. Consistency with HCDA plans and policies is discussed above.

4.1.4. State of Hawaii, Department of Transportation, Airports Division, Kalaeloa Airport Master Plan

HDOT-A acquired JRF to relieve the undesirable mix of small light aircraft with large heavy aircraft at Daniel K. Inouye International Airport (HNL), which is listed as one of the 20 busiest airports in the Country. Prior to HDOT-A operations at JRF, the FAA identified HNL as the only airport out of 23 congested airports in the nation that didn't have a reliever airport.

Discussion:

According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators. The project also supports these benefits from the JRF master plan:

- Includes new revenue-producing facilities that will help offset the cost of operating an additional airport in the State system.
- Utilizes financing by airport system users rather than general taxpayers.
- The action supports the HDOT-A mission, goals, and objectives.

4.1.5. Airport Zoning Act

The entire project area is in the Airports horizontal zone, pursuant to Hawaii Administrative Rules, §19-12-4 and §19-12-5, as authorized by Hawaii Revised Statutes, Chapter 262-3, the Airport Zoning Act. All HDOT-A lessees at JRF support the State of Hawaii airports system.

Discussion:
The proposed action is in conformance with airport zoning regulations and will not create an airport hazard.

4.1.6. Hawaii Coastal Zone Management Program

The National Coastal Zone Management (CZM) Program was created through passage of the Coastal Zone Management Act of 1972. The U.S. Congress enacted the CZM Act to assist states in better managing coastal and estuarine environments. The Act provides grants to states that develop and implement federally approved CZM plans. The goal of the CZM Act is to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." Hawaii's CZM Act, adopted as Chapter 205A, HRS, provides a basis for protecting, restoring and responsibly developing coastal communities and resources. In Hawaii, the "coastal zone management area" means 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 territorial sea.

Discussion:
Pursuant to Chapter 205A, HRS, the City and County of Honolulu has been given the authority to establish a Special Management Area (SMA) for the island of Oahu to protect coastal resources from development. The City regulates development within the SMA and administers SMA permits for any proposed developments under its SMA ordinance codified in Chapter 25, Revised Ordinances of Honolulu (ROH). As such, the proposed action's conformance with CZM Program policies and regulations is discussed in the context of conformance with the City's SMA rules as presented in Section 4.2.4.

4.2. City and County of Honolulu Land Use Plans and Policies

The overarching purpose and need of the proposed action is to develop the FBO and Fuel Farm Facility to serve existing and future GA operations at JRF.

4.2.1. City and County of Honolulu General Plan

The City and County of Honolulu last updated and amended its General Plan in October of 2002. However, this version of the General Plan for the City and County of Honolulu is currently being revised. The General Plan for the City and County of Honolulu is a written commitment by the City and County government to a future for the island of Oahu which it considers desirable and attainable. The Plan is a two-fold document: First, it is a statement of the long-range social, economic, environmental, and design objectives for the general welfare and prosperity of the people of Oahu. These objectives contain both statements of desirable conditions to be sought over the long run and statements of desirable conditions that can be achieved within an

approximately 20-year time horizon. Second, the General Plan is a statement of broad policies that facilitate the attainment of the objectives of the Plan.

The General Plan is a guide for all levels of government, private enterprise, neighborhood and citizen groups, organizations, and individual citizens in eleven areas of concern:

(1) Population;
(2) Economic activity;
(3) Natural environment;
(4) Housing;
(5) Transportation and utilities;
(6) Energy;
(7) Physical development and urban design;
(8) Public safety;
(9) Health and education;
(10) Culture and recreation; and
(11) Government operations and fiscal management.

The proposed action is generally relevant and consistent with the applicable goals, objectives, policies, and actions of the City and County of Honolulu General Plan. The specific General Plan objectives and policies applicable to JRF are set forth below.

Transportation and Utilities

Objective A: To create a transportation system which will enable people and goods to move safely, efficiently, and at a reasonable cost; serve all people, including the poor, the elderly, and the physically handicapped; and offer a variety of attractive and convenient modes of travel.

Policy 12: Encourage the provision of separate aviation facilities for small civilian craft.

Objective D: To maintain transportation and utility systems which will help Oahu continue to be a desirable place to live and visit.

Policy 4: Evaluate the social, economic, and environmental impact of additions to the transportation and utility systems before they are constructed.

Discussion:

The Kalaeloa Airport Master Plan identified the need to provide space for lease lots which HDOT-A can lease to individual lessees for aviation-related uses. Use of lease lots is typically done at most of the State's airports. The terms and conditions of the lease can vary according to the lessee's intended use. The HDOT-A has also developed lease

lots at Daniel K. Inouye International Airport along Lagoon Drive. The proposed project is consistent with this initiative and will be leased by the Applicant to support aviation related uses.

The proposed action will support aviation related-uses for small aircrafts and is consistent with Policy 12 under Objective A. Furthermore, the social, economic, and environmental impact of the proposed action is being evaluated prior to construction through this EA, consistent with Policy 4 under Objective D.

Physical Development and Urban Design

Objective C: To develop a secondary urban center in Ewa with its nucleus in the Kapolei area.

Policy 2: Encourage the development of a major residential, commercial, and employment center within the secondary urban center at Kapolei.

Discussion:
The State and the City and County of Honolulu continue to promote increased residential and economic activity in the Kapolei area as the "second city." The airport at Kalaeloa is envisioned as a prime economic driver, creating jobs and providing services as population in the region continues to grow. The proposed action will serve to supplement and meet the demands of a growing secondary urban center. Consequently, development of the proposed action is consistent with the Physical Development and Urban Design objectives and policies of the City's General Plan.

4.2.2. Ewa Development Plan

The Ewa Development Plan, adopted July 2013, serves as the policy guide for Ewa's future development. It is one of a set of eight community-based plans intended to guide public policy, infrastructure investment, and land use decision-making over a 25-year planning period. JRF is consistent with the Ewa Development Plan Urban Land Use Map and Public Facilities Map, both of which show "Airfield" designations. Additionally, the proposed action is consistent with the existing uses and activities at JRF. Pursuant to development standards, proposed structures will not exceed 60 feet in height and, if determined by DPP to be required, landscape screening will be provided to minimize the visibility of parking, storage, and industrial equipment and operations areas from the street.

4.2.3. City and County of Honolulu Land Use Ordinance

The purpose and intent of the City and County of Honolulu Land Use Ordinance is to regulate land use in a manner that will encourage orderly development in accordance with adopted land use policies, including the Oahu General Plan and development plans, and to promote and protect the public health, safety, and welfare.

Discussion:

The Land Use Ordinance (LUO) (Revised Ordinances of Hawaii (ROH, Chapter 21-3) implements the goals and objectives of the Oahu General Plan and the Ewa Development Plan. All lands within the City and County of Honolulu (CCH) are zoned into specified districts. According to an October 30, 2020 letter from DPP, the project site was zoned F-1 Military and Federal District (See Figure 4-2: City and County of Honolulu Zoning Map). The purpose for creating the F-1 military and federal preservation district is to identify areas in military or federal government use and to permit the full range of military or federal government activities. However, the site was transferred to the HCDA. Consistency with HCDA plans and policies is discussed in Section 4.1.3.

4.2.4. City and County of Honolulu Special Management Area

The Coastal Zone Management Act contains the general objectives and policies upon which all counties within the State have structured specific legislation which created the SMA. The CZM law, set forth by Chapter 205A, Hawaii Revised Statutes, as amended, establishes that the counties shall designate and administer the SMA within the State's coastal area. Any development, as defined by Chapter 205A, within the Special Management Area boundary requires a SMA Use (SMP) permit subject to Chapter 25, ROH.

Discussion:

An approximately 26.4-acre portion of the southern end of Kalaeloa Airport is located within the SMA. The project site is not located within the SMA (See Figure 4-3: Special Management Area Map). Consequently, a SMP is not required to implement the proposed action.

4.3. Required Permits and Approvals

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

Federal

Federal Aviation Administration

- FAA 7460-01 Notice Proposed Construction or Alteration

State of Hawaii

Department of Health

- Environmental Hazard Management Plan
- NPDES Construction Permit
- NPDES Operational Permit

Department of Land and Natural Resources, State Historic Preservation Division

- Chapter 6E

Department of Transportation

- Air Permit for Operations
- Construction Site Runoff Control Program
- Permit to Discharge into the State Airport Drainage System
- Spill Prevention Control and Countermeasure Plan
- Street Usage Permit

Hawaii Community Development Authority

- Development Permit

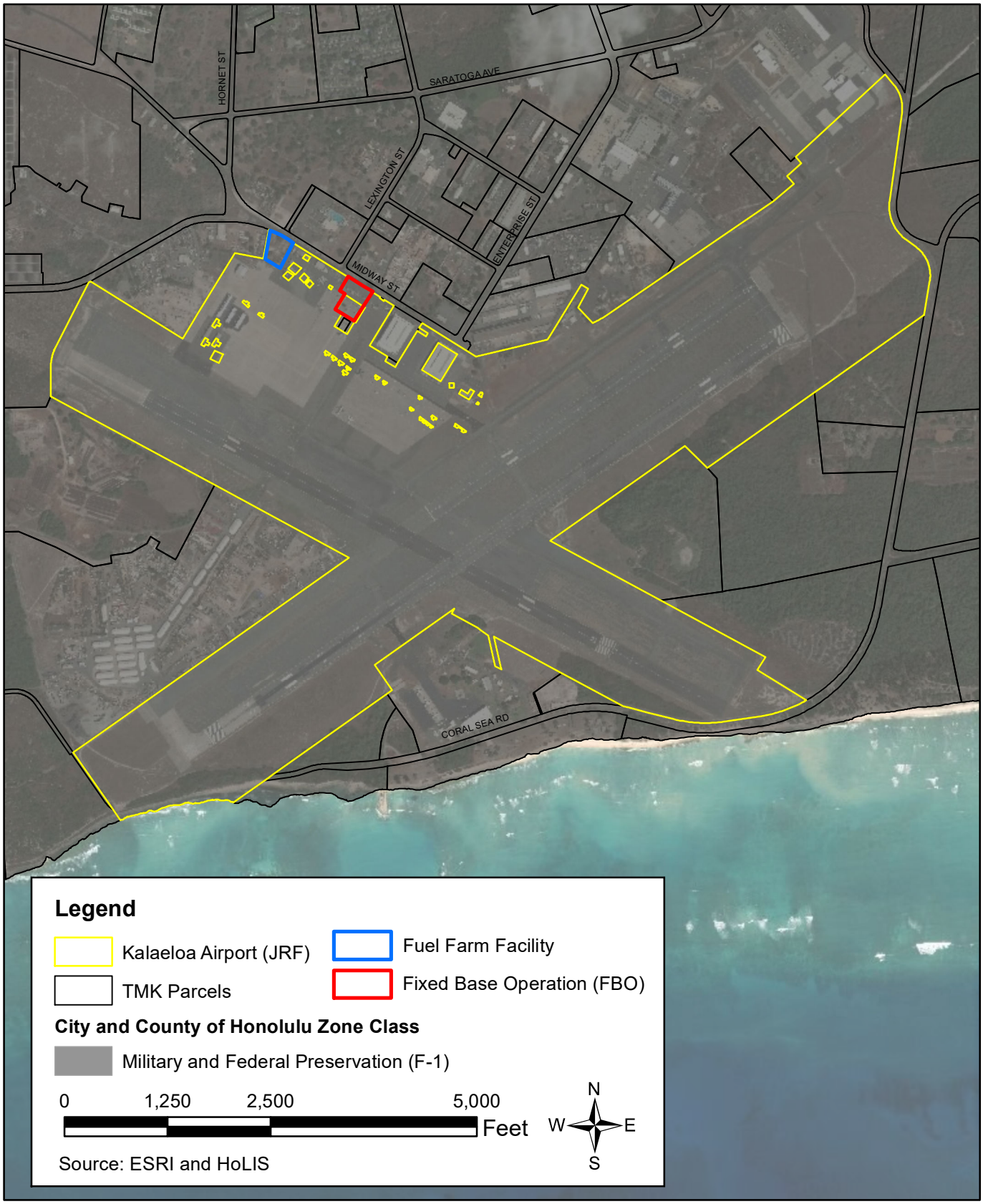
City and County of Honolulu

Department of Planning and Permitting

- Building Permit
- Civil Engineering Branch Permits
- Electrical Permit
- Facility Access Review
- Grading Permit/Trenching Permit
- Certificate of Occupancy
- Construction Dewatering
- Mechanical/Plumbing Permit
- Site Development Division Master Application Form for Sewer Connection
- Solid Waste Disclosure Form for Construction Sites
- Stockpiling Permit
- Stormwater Drain Connection
- Excavation and Repair of Streets and Sidewalks
- Tank Installation Permit

Honolulu Fire Department

- Plan Review

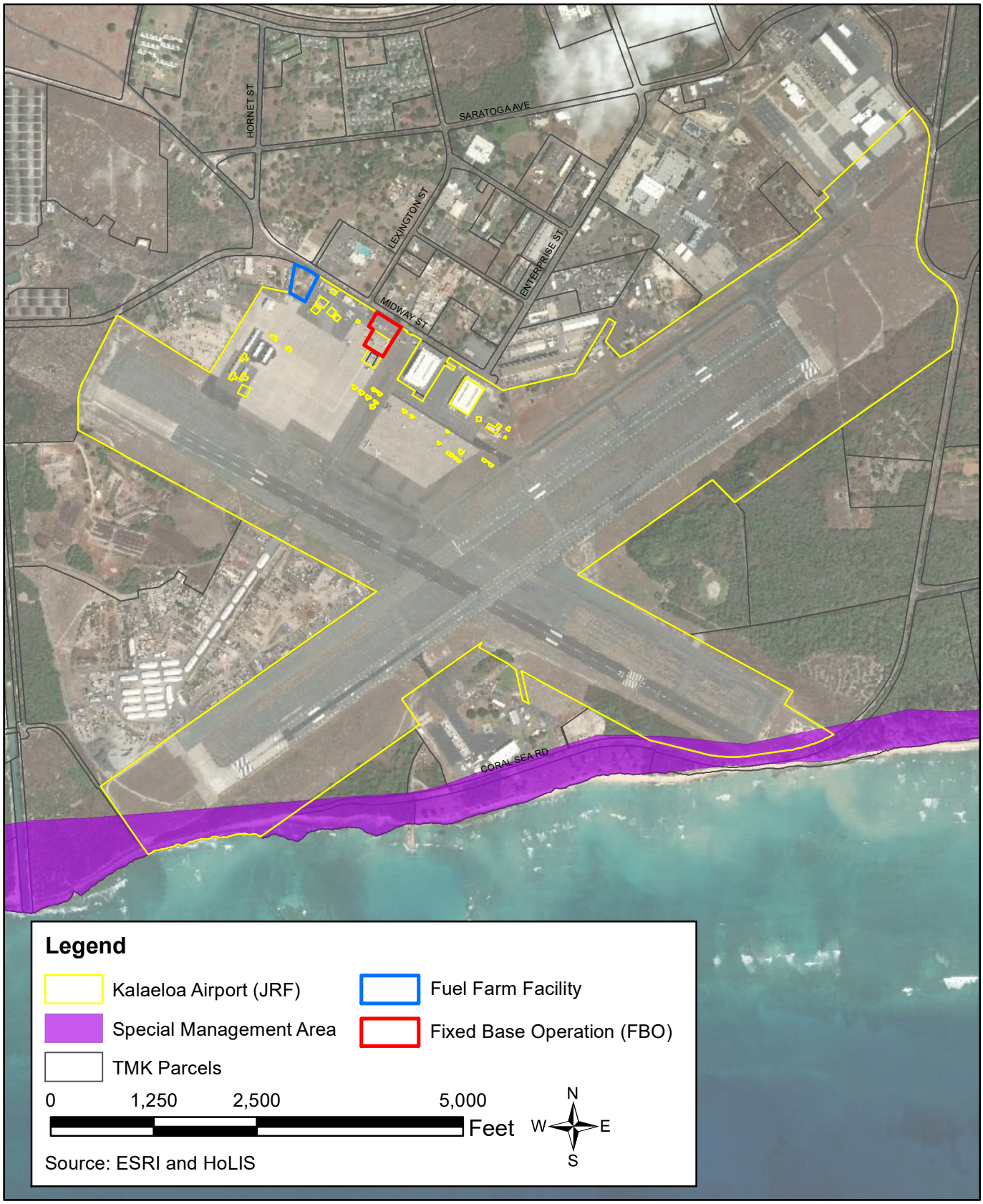


WILSON OKAMOTO CORPORATION

FIGURE 4-2

City and County of Honolulu Zoning Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii



WILSON OKAMOTO CORPORATION

FIGURE 4-3

Special Management Area Map

Million Air - Kalaeloa Airport Fixed Based Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii

(This page intentionally left blank)

CHAPTER 5: ALTERNATIVES

5. ALTERNATIVES

Hawaii Administrative Rules, §11-200.1-18 requires an environmental assessment to identify and consider alternative means to realize the purpose and need of the proposed action.

Alternatives eliminated from consideration include no action, and alternative design schemes.

5.1. No Action Alternative

Under the No Action Alternative, the proposed action would not be constructed, and the project site would remain in its existing condition.

The No Action Alternative precludes permit approvals, as well as costs for design and construction which will otherwise be required for the proposed project. The No Action Alternative also avoids insignificant environmental impacts that will occur as a result of implementing the proposed action along with appropriate mitigation measures, as discussed in Chapter 3.

This alternative fails to satisfy the purpose and need of the proposed action, and thus is not a feasible alternative.

5.2. Alternative Design Schemes

In the course of developing the proposed project, the design team considered several different alternative design schemes for the development of a new FBO and Fuel Farm Facility to serve GA operations at JRF.

Specifically, alternative design and equipment configurations were considered under the scope of the proposed action; however, the general design scheme proposed was selected to serve as the basis of this impact assessment as it reflects the optimal use of space and deployment of preferred equipment ideally suited for its intended purpose and use.

Alternative locations were not considered because no other suitable lands on the premises of JRF are currently available for development.

(This page intentionally left blank)

CHAPTER 6: DETERMINATION OF FONSI

6. DETERMINATION OF FINDING OF NO SIGNIFICANT IMPACT

Potential impacts of the proposed improvements have been evaluated in accordance with the significance criteria of §11-200.1-13 of the Department of Health's Administrative Rules. Discussion of the proposed action's conformance to the criteria is presented as follows:

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

No natural, cultural, or historic resources of significance were identified on the proposed project site. The immediate surrounding area is comprised of heavily disturbed soils; it is unlikely that any cultural resources and/or human skeletal remains are present on site. In the event of unexpected discovery of historic or archaeological resources, all work will stop immediately and the SHPD will be immediately notified for appropriate action.

It is important to note that the subject project is currently progressing through an iterative design process that is typical of early, conceptual project planning at this stage of project development. Implementation of the mitigation measures discussed in Section 3.6, and as further identified through HRS Chapter 6E review as a condition of final project design and construction, will ensure that appropriate measures are taken to avoid, minimize and mitigate potential impacts to historic properties that could result from the construction and operation of the proposed project.

(2) Curtail the range of beneficial uses of the environment;

The proposed project will not curtail the range of beneficial uses of the environment. The operations and uses associated with the proposed action are consistent with the character of the adjacent / surrounding areas.

(3) Conflict with the State's environmental policies or long-term environmental goals established by law;

The proposed action does not conflict with the long-term environmental policies, goals, and guidelines of the State of Hawaii. As presented in this EA, any potential temporary impacts associated with short-term construction-related activities will be mitigated through adherence to standard construction impact mitigation practices and compliance with applicable City, State, and Federal regulations.

(4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;

In the short term, construction expenditures will provide positive benefits to the local economy. This will include the creation of some construction and construction support jobs, and the purchase of materials from local suppliers, as well as indirect benefits to local retail businesses resulting from construction activities, but not at a level that will generate any significant population expansion.

In the long-term, the proposed action will serve as a critical facility to serve GA operations at JRF, which is envisioned as a prime economic driver for the Ewa region, creating jobs and providing services as population in the region continues to grow. In addition to facilitating existing GA operations, the proposed action will also serve to promote growth and commerce development in Hawaii.

(5) Have a substantial adverse effect on public health;

No identifiable adverse short or long-term impacts on public health are anticipated to result from the construction and operation of the proposed action. Typical short-term construction-related impacts (e.g., noise and air quality) are anticipated, however, these impacts will be temporary in nature and will comply with City, State and Federal regulations.

(6) Involve adverse secondary impacts, such as population changes or effects on public facilities;

Substantial impacts to public facilities are not anticipated to result from the construction and operation of the proposed project. Moreover, the proposed project is not anticipated to induce population growth in the area or region. Existing public water, wastewater, drainage, and utility infrastructure have served the area for many years and are expected to have sufficient capacity to serve project demands. Agencies with jurisdiction over their respective infrastructure systems will be consulted as the project proceeds to assure proper implementation.

(7) Involve a substantial degradation of environmental quality;

The proposed project is a redevelopment of a pre-disturbed site and is not anticipated to substantially degrade environmental quality. Long-term impacts to air and water quality, noise levels and natural resources will be minimal. Typical short-term construction-related impacts (e.g., noise and air quality) are anticipated, but will be temporary and will comply with applicable City, State, and Federal regulations.

(8) Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;

The proposed action does not have a substantial adverse effect upon the environment. Uses and activities associated with the proposed action are consistent with the current and planned uses of the site. There are no commitments for further action beyond the scope presented within this EA.

(9) Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;

No listed or protected plant species are known to occur at the project site. Rare, threatened, or endangered fauna are not known to utilize the site for either habitat or foraging purposes. No adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action.

(10) Have a substantial adverse effect on air or water quality or ambient noise levels;

No long-term significant impacts to air quality, water quality, or noise levels within the project site are anticipated as a result of the construction and operation of the proposed action.

Respective contractors will be responsible to minimize air quality impacts during the various phases of construction. Exhaust emissions from construction vehicles are anticipated to have negligible impacts on air quality in the project vicinity as the emissions will be relatively small and will readily dissipate.

Construction of the proposed action will not involve major land disturbing activities. No short or long-term significant impacts on surface and/or coastal waters in the project vicinity are anticipated during construction or operation of the proposed action. There are no streams or wetlands on or within close proximity to the project site. A NPDES permit for storm water runoff from construction activities will be required as individual and/or cumulative soil disturbances at the project site exceed one acre of land area. The permit requires a Stormwater Pollution Prevention Plan (SWPPP) to document the measures that will be taken to prevent stormwater runoff from construction activities. Prior to construction, preparation of an erosion control plan and installation of BMPs is also required and will be inspected by HDOT-A's third-party inspector to ensure that all BMPs measures are properly installed per the SWPPP and plan drawings, and that all required documentation and permits are in place prior to excavation activities. These BMPs will be inspected routinely construction and will be completely removed, once it is confirmed that the area is fully stabilized, after construction. Any discharges related to project construction or operation activities will comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and Chapter 11-55 Water Pollution Control.

In the long-term, the project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

In the short and long-term, no significant impacts on noise levels are anticipated as a result of the construction and operation of the proposed action. Impacts from construction noise are not anticipated to be significant as the project site and much of the surrounding land uses are considered airport or industrial related. Once construction has been completed, noise impacts from aircraft operations to surrounding areas, including those from aircraft using the proposed facilities, will be consistent with existing conditions.

(11) Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

No short or long-term significant impacts are anticipated as the project site is not located within an environmentally sensitive area.

According to the FIRM, the project site is designated Zone D, an area where there is possible but undetermined flood hazards. Generally, risks of flooding at the airport are low due to a combination of factors that include low rainfall, thin soil layer, slope, and the porosity of the bedrock. During periods of heavy rainfall, localized ponding and some scouring by flowing surface water may occur. However, those conditions typically dissipate as the water rapidly percolates through the substrate.

(12) Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or state plans or studies; or,

The proposed action will not result in significant impacts to view planes identified in City or State plans or studies. Moreover, the proposed project is not expected to adversely affect scenic and visual resources in the project area. The proposed project will not degrade lateral coastal views or mauka-makai views from areas in the vicinity of the site. The vertical components of the proposed action will be consistent with the visual character of the surrounding uses.

(13) Requires substantial energy consumption or emit substantial greenhouse gases.

The construction and operation of the proposed action will not require a significant level of energy consumption. Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.

CHAPTER 7: CONSULTATION

7. CONSULTATION

7.1. EA Early Consultation

Earlier in the environmental review process, it was anticipated that the Proposed Action could be declared exempt from preparation of an EA pursuant to the Exemption List for the State of Hawaii, Department of Transportation, reviewed and concurred upon by the Environmental Council on November 15, 2000. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17. HDOT-A later determined that an EA will be required, but that the previously conducted consultation effort could serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a). As such, the following agencies and organizations were consulted during the early consultation for the project. Parties that formally replied during the pre-assessment period, are indicated by a "✓" below. All written comments and responses are reproduced in Appendix A.

Federal Agencies

- Federal Aviation Administration – Airports District
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- ✓ U.S. Coast Guard – Air Station Barbers Point
- ✓ U.S. Department of Homeland Security, TSA Pacific Airports Coordination Center
- U.S. Department of the Interior, Fish and Wildlife Service

State Agencies

- ✓ Department of Accounting and General Services
- Department of Agriculture
- Department of Business, Economic Development and Tourism
- Department of Business, Economic Development and Tourism, Office of Planning
- Department of Defense
- Department of Defense, Hawaii Army National Guard
- Department of Health
- Department of Land and Natural Resources
- ✓ Office of Hawaiian Affairs

City and County of Honolulu Agencies

- Board of Water Supply
- ✓ Department of Community Services
- ✓ Department of Design and Construction
- Department of Environmental Services
- Department of Parks and Recreation
- ✓ Department of Planning and Permitting

Department of Transportation Services
✓ Honolulu Fire Department
✓ Honolulu Police Department

Elected Officials

U.S. Senator Brian E. Schatz
U.S. Congressman Ed Case
State Senator Mike Gabbard
State Representative Sharon E. Har
City Councilmember Kymberly Marcos Pine

Utility Companies

Hawaiian Electric Company

Other Interested Parties and Individuals

Chairperson Jack Legal, Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34
✓ Chairperson John Whalen, Hawaii Community Development Authority
Air Cargo Association of Hawaii
✓ General Aviation Council of Hawaii
Hawaii Army National Guard
Hunt Companies

7.2. Draft Environmental Assessment Consultation

The Draft Environmental Assessment for the Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility was published in the Office of Environmental Quality Control's *The Environmental Notice* on February 8, 2021. Publication initiated a 30-day public review period ending on March 10, 2021. The following agencies, organizations, and individuals provided written comments on the Draft EA. All written comments and responses are reproduced in Appendix B.

Federal Agencies

Federal Aviation Administration – Honolulu Airports District Office
U.S. Department of the Interior, Fish and Wildlife Service

State Agencies

Department of Accounting and General Services
Department of Land and Natural Resources
Office of Hawaiian Affairs

City and County of Honolulu Agencies

Department of Design and Construction
Department of Facility Maintenance
Department of Planning and Permitting
Honolulu Fire Department
Honolulu Police Department

Utility Companies

Board of Water Supply
Hawaii Gas

Other Interested Parties and Individuals

Alicia Campbell
Amelia Anderson
American Renaissance Academy
Amy Raymond
Anuhea Perry
Bill van den Hurk
Brad Hayes
Brian Walker
Christine Casison
Colby Jones
Colleen Aiwohi
Don Cridlebaugh
Donna Sanchez
Duane Eldredge
Elaine Balthazar-Chang
Eugene Chong
Ford Matsunaga
Frederick Turshman
Hiiaka Jardine
Jacob Sills
Jacob Straube
Jaris Flora
John Bond
John Sanchez
Jon Perry
Kailee Chang
Kaleo Kamaka
Kathleen Popa
Kealoha Chang
Keola Firmin
Keone Kaleikula-Kele
Lea Ann Kakimoto
Leahi Ma
Mahina Silva
Malisa Kaleikula-Kele
Marleen Serrao
Melvin Andres
Micah Sanchez
Michael Hruby, Five Star
Michael Silva
Michelle Perry
Nainoa Hopkins

Nomen Nescio
Paul Anderson
Princess Ynoba
Regi Perry
Sharon Miller
Vincent Perry
Various Anonymous Individuals

7.3. Neighborhood Board Meeting

On April 8, 2021, the Applicant presented details in a meeting of the Ewa Neighborhood Board. The following is a summary of the questions and concerns that were brought up during the meeting, as well as the responses that were provided at the meeting:

Comment	Response
Will this facility be accepting interisland flights/airlines (i.e. Hawaiian Airlines)?	The facility will accommodate military aircraft, as well as small to medium general aviation aircraft which is the same as what is being accommodated there now. This project is not intended to support major commercial airlines, which will only use this airport if for some reason they could not land at Honolulu International Airport.
DOT promised the community that the airport would bring in interisland flights, which doesn't sound like is happening with this project.	This project is being privately funded and will be privately owned, and it will not preclude HDOT-A from accepting inter-island flights or other commercial flights in the future.
Who is the agency responsible for contracting this project?	The State of Hawaii, Department of Transportation, Airports Division.
Where is the fuel farm site being located? There are schools nearby. Have the schools been notified and do they know about the project?	The project is located adjacent to Midway Street. There is a school located nearby. A notification letter regarding the publication of the Draft EA was sent to City, State and Federal agencies, including the DOE; utility companies; and other organizations. On the Draft EA we did receive comments from the nearby school and are addressing those comments in the Final EA.
How far is the fuel farm from the ocean?	The project is about a mile from the ocean. If the concern is water quality, we note that the Fuel Farm Facility will use double-wall tanks and a secondary containment area to mitigate spills. In addition, the project will need to comply with State water quality standards.

Will this project be replacing the aviation museum?	The aviation museum is no longer there. An EA for the development of this area into lease lots was completed in 2010, and this project will take the place of one of those lease lots and will not physically take the place of the museum.
Does this project have a website?	No, but the Draft EA for the project has been published with the OEQC and is available online.
Can we comment on this project?	The comment period ended March 10, 2021, but the project is still ongoing, and we are happy to pass along any questions or comments to the project applicant or DOT.

(This page intentionally left blank)

CHAPTER 8: REFERENCES

8. REFERENCES

Federal Emergency Management Agency, *Flood Insurance Rate Map Panel No. 0353G*, retrieved from gis.hawaiinfip.org/

California Water Service Group, 2020, *Hawaii Water Service Completes Purchase of Kalaeloa Water Company*, retrieved from: https://www.globenewswire.com/news-release/2020/11/03/2119619/0/en/Hawaii-Water-Service-Completes-Purchase-of-Kalaeloa-Water-Company.html

City and County of Honolulu, *General Plan, Objectives and Policies,* Amended October 3, 2002.

City and County of Honolulu, Department of Planning and Permitting, *Primary Urban Center Development Plan,* June 2004.

Handy, E.S.C and Elizabeth Green Handy, 1972, *Native Planters in Old Hawaii: Their Life, Lore, and Environment.* Bernice P. Bishop Museum Bulletin 233. Bishop Museum Press, Honolulu, Hawaii.

Hawaii Community Development Authority, 2015. *Innovation Block at Lot "C" Master Plan Final Environmental Assessment*, prepared by Wilson Okamoto Corporation.

Hawaii Community Development Authority, 2006. *Kalaeloa Master Plan*, prepared by Belt Collins et al.

Hawaii Climate Change Mitigation and Adaptation Commission, 2017, Hawaii Sea Level Rise Vulnerability and Adaptation Report, prepared by Tetra Tech, Inc. and the State of Hawai'i Department of Land and Natural Resources, Office of Conservation and Coastal Lands, under the State of Hawai'i Department of Land and Natural Resources Contract No: 64064.

Hawaii Tourism Authority, 2019, *2019 Annual visitor Research Report*, prepared by Jennifer Chun, Minh-Chau Chun, Lawrence Liu, Arianna Kwan and Joseph Patoskie, retrieved from: https://www.hawaiitourismauthority.org/research/annual-visitor-research-reports/

Honolulu Police Department (HPD), 2021, *About Us,* retrieved from: https://www.honolulupd.org/about-us/.

Honolulu Fire Department (HFD), 2020, *About HFD,* retrieved from: www.honolulu.gov/hfd/abouthfd.html.

Oil Pollution Prevention, 40 C.F.R. §112 (2002, as amended).

State of Hawaii Department of Business, Economic Development and Tourism, *Hawaii Administrative Rules Title 15 Department of Business, Economic Development and Tourism Chapter 15 Land Use Commission Rules,* amended and compiled October 8, 2019.

State of Hawaii Department of Business, Economic Development and Tourism, January 2010, *Hawaii Innovation Indicators,* retrieved from: http://files.hawaii.gov/dbedt/economic/data_reports/reports-studies/innovation-indicators-2010.pdf

State of Hawaii Department of Commerce and Consumer Affairs, 2012, *Hawaii Broadband Strategic Plan.*

State of Hawaii Department of Education (DOE), 2019, 2018-19 Stive HI System Results, retrieved from: https://www.hawaiipublicschools.org/VisionForSuccess/AdvancingEducation/StriveHIPerformanceSystem/Pages/2018-19-results.aspx

State of Hawaii Department of Health, *Hawaii Administrative Rules Title 11 Department of Health Chapter 54 Water Quality Standards*, amended and compiled November 15, 2014.

State of Hawaii Department of Health, *Hawaii Administrative Rules Title 11 Department of Health Chapter 55 Water Pollution Control*, amended and compiled February 9, 2019.

State of Hawaii Department of Health, *Hawaii Administrative Rules Title 11 Department of Health Chapter 58.1 Solid Waste Management Control*, amended and compiled January 13, 1994.

State of Hawaii Department of Health, *Hawaii Administrative Rules Title 11 Department of Health Chapter 60.1, Air Pollution Control*, amended and compiled September 16, 2003.

State of Hawaii Department of Health, *Hawaii Administrative Rules Title 11 Department of Health Chapter 200.1 Environmental Impact Statement Rules,* 2019.

State of Hawaii Department of Health, *Hawaii Ambient Air Quality Data*, Clean Air Branch, Internet, Available at: http://health.hawaii.gov/cab/Hawai‘i-ambient-air-quality-data/

State of Hawaii Department of Health Department Health, 2019, Hawaii Greenhouse Gas Emissions Report for 2016, prepared by ICF and University of Hawaii- Economic Research organization, retrieved from:

https://health.hawaii.gov/cab/files/2019/12/2016-Inventory_Final-Report_December2019-1.pdf

State of Hawaii Department of Transportation, *Hawaii Administrative Rules Title 19 Department of Transportation Subtitle 2 Airports Division Chapter 12 Airport Zoning*, amended and compiled May 24, 2007.

State of Hawaii Department of Transportation, *Hawaii Administrative Rules Title 19 Department of Transportation Subtitle 2 Airports Division Chapter 17.1 Small Plan aHangar Units and Tie-Down Spaces at Public Airports*, amended and compiled November 30, 1990.

State of Hawaii Department of Transportation Airports Division, 2019, *Programmatic Environmental Hazard Evaluation and Environmental Hazard Management Plan*, prepared by Environmental Science International, Inc.

State of Hawaii Department of Transportation Airports Division, 2010, *Final Environmental Assessment/Finding of No Significant Impact Kalaeloa Airport Development Plan Improvements*, prepared by Wilson Okamoto Corporation.

State of Hawaii Department of Transportation Airports Division, 1998, *Kalaeloa Airport Master Plan*, prepared by Aries Consultants Ltd.

State of Hawaii, Hawaii Revised Statutes, *Chapter 6E Historic Preservation.*

State of Hawaii, Hawaii Revised Statutes, *Chapter 205 Land Use Commission.*

State of Hawaii, Hawaii Revised Statutes, *Chapter 205A Coastal Zone Management*.

State of Hawaii, Hawaii Revised Statutes, *Chapter 226 Hawaii State Planning Act.*

State of Hawaii, Hawaii Revised Statutes, *Chapter 262 Airport Zoning Act.*

State of Hawaii, Hawaii Revised Statutes, *Chapter 343 Environmental Impact Statements*.

U.S. Census Bureau American Fact Finder, Profile of General Population and Housing Characteristics: 2010, retrieved from: http://factfinder2.census.gov

U.S. Census Bureau, Honolulu County – Quick Facts from the U.S. Census Bureau, retrieved from: http://quickfacts.census.gov/qfd/states

U.S Department of Agriculture Natural Resource Conservation Service, *Soil Classification*, Internet, retrieved from: http://soils.usda.gov/technical/classification/

U.S Department of Education (DOE), n.d*., Search for Public Schools,* retrieved from https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&Miles=10&Zip=96792&ID=150003000135

U.S Department of the Navy, 1999, *Final Environmental Impact Statement for the Disposal and Reuse of the Naval Air Station*.

U.S. Fish and Wildlife Service, National Wetlands Inventory, retrieved from: http://www.fws.gov/wetlands/Data/Mapper.html

University of Hawaii, 2012, *Final Environmental Assessment: University of Hawaii Pacific Health Research Laboratory,* prepared by Wilson Okamoto Corporation.

University of Hawaii at Hilo, Department of Geography, Atlas of Hawaii, Third Edition, Edited by Sonia P. Juvik and James O. Juvik, University of Hawaii Press, Honolulu, 1998.

APPENDIX A

Early Consultation Comments and Responses

(This page intentionally left blank)

From: Eriks, Andrew CAPT
To: Katy Moran
Subject: Million Air JRF Consultation
Date: Friday, October 30, 2020 5:43:21 PM

Katy,

Aloha! This email is in response to the proposed Fixed Base Operation (FBO) and Fuel Facility at Kalaeloa Airport (JRF), Oahu, Hawaii.

I've reviewed the literature on the proposed project and have no comments or concerns. Thank you!

Regards,

AWE

CAPT Andy Eriks
Commanding Officer
Air Station Barbers Point
Work: (808) 682-2711
Cell: (571) 329-8677
Email: Andrew.W.Eriks@uscg.mil

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Captain Andy Eriks
U.S Coast Guard
U.S Department of Defense
Air Station Barbers Point
1 Coral Sea Road
Kapolei, HI 96707

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Captain Eriks:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

From: HNLcoordinationcenter
To: Katy Moran
Cc: Hays, Hannah A; Tuiolosega, Herman; Molly Waller; HNLcoordinationcenter
Subject: RE: Kalaeloa Airport Exemption Letter and Project Analysis
Date: Tuesday, October 27, 2020 4:00:16 PM

Dear Katy Moran,

Aloha from Hawaii!

We reached out to our regulatory department and unfortunately were informed that we at TSA HNL do not review these types of developments. They also did not know who we could direct you to.

Best regards,

TSA Pacific Airports Coordination Center
Wendy Kaneshiro, SCCO
Office: 808-838-2501
HNLCoordinationCenter@tsa.dhs.gov

Please consider the environment before printing this e mail

This communication, along with any attachments, is covered by Federal and State law governing electronic communications and may contain confidential and legally privileged information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, use or copying of this message is strictly prohibited. If you have received this in error, please reply immediately to the sender and delete this message.

From: Katy Moran <katy@plan.design>
Sent: Tuesday, October 27, 2020 9:58 AM
To: HNLcoordinationcenter <HNLcoordinationcenter@tsa.dhs.gov>
Cc: Hays, Hannah A <hannah.a.hays@hawaii.gov>; Tuiolosega, Herman <herman.tuiolosega@hawaii.gov>; Molly Waller <molly@plan.design>
Subject: Kalaeloa Airport Exemption Letter and Project Analysis

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. If you believe this is SPAM or a phishing email, contact the TSA Cyber Security Operations Center at TSA-SPAM.

To Whom It May Concern,

Million Air is currently compiling comments on a fixed base operator and fuel farm at Kalaeloa Airport in compliance with the Hawaii Revised Statutes Chapter 343 Environmental review. Attached you will find the exemption letter and the project analysis. There is a 30 day period in which comments will be received and considered. Please reach out with any further questions.

Thank you,

Katy

KATY MORAN
CENTURION PLANNING & DESIGN
325.757.1001 (o)
katy@plan.design

WILSON OKAMOTO CORPORATION
INNOVATORS · PLANNERS · ENGINEERS

10613-01
February 1, 2021

Ms. Wendy Kaneshiro, SCCO
TSA Pacific Airports Coordination Center
300 Rodgers Boulevard
Honolulu, HI 96819
HNLCoordinationCenter@tsa.dhs.gov

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Ms. Kaneshiro:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

DAVID Y. IGE
GOVERNOR

CURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

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

(P)20.165

OCT 13 2020

Ms. Katy Moran
Centurion Planning and Design
69 N. Chadbourne Street
San Angelo, TX 76904

Dear Ms. Moran:

Subject: Environmental Consultation pursuant to HRS, Section 343-6(a)(2) and HAR, Section 11-200.1-17(b), for a proposed Fixed Base Operation (FBO) and Fuel Facility at Kalaeloa Airport (JRF), Oahu, Hawaii

Thank you for the opportunity to provide comments on your environmental consultation for the subject project. We have no comments to offer at this time, as the subject project does not appear to directly impact any of the Department of Accounting and General Services' managed facilities or properties.

If you have any questions, your staff may call Ms. Gayle Takasaki of the Planning Branch at (808) 586-0584.

Sincerely,

CHRISTINE L. KINIMAKA
Public Works Administrator

GT:mo

WILSON OKAMOTO CORPORATION
INNOVATORS · PLANNERS · ENGINEERS

10613-01
February 1, 2021

Ms. Gayle Takasaki
Department of Accounting and General Services
State of Hawaii
P.O Box 119
Honolulu, HI 96810-0119

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Ms. Takasaki:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

From: Katy Moran
To: Malama, Tesha
Cc: Molly Waller; Hays, Hannah A; Tuiolosega, Herman; Cox, Matt
Subject: Response Regarding HCDA"s Comments
Date: Friday, October 23, 2020 3:13:00 PM

Hello Tesha,

Thank you for your comments on the proposed FBO and Fuel Farm project by Million Air at Kalaeloa Airport (JRF). Million Air has the following responses to the comments provided:

1. The proposed project should be submitted for an HCDA development permit application and Land owners Authorization form should be signed and submitted with the application.
    a. Million Air will submit the proposed project for HCDA development permit application.
2. What are the safety measures? Explosion, fire, etc.
    a. The project will follow all mandated safety measures set forth by the Department of Transportation, Federal Aviation Administration, and County. Accordingly, a Safety Risk Management Panel of FAA, DOTA, and aviation experts will be conducted to review the proposed facility and operations before construction.
3. Currently, Midway road is substandard. There is no sidewalks, traffic signals, lighting, etc. What mitigation will the project provide?
    a. Midway Street is outside DOTA's jurisdiction and Million Air does not have improvement plans for Midway St except for a gateway and driveway access improvements from the airport to the street.
4. What is the anticipated traffic impact to the area?
    a. The proposed project will not create significant traffic impacts.
5. What is the plan for public use and access, if any?
    a. The project will be inside a secured airports area and public use and access is authorized for specific users only.
6. How does this project meet the Kalaeloa Master Plan and Rules?
    a. This project meets requirements of DOT's Kalaeloa Airport Master Plan, which is consistent with and supports the Kalaeloa Master Plan and Rules.

Thank you,

KATY MORAN
CENTURION PLANNING & DESIGN
325.757.1001 (o)
katy@plan.design

From: Malama, Tesha <tesha.malama@hawaii.gov>
Sent: Friday, October 16, 2020 5:06 PM
To: Katy Moran <katy@plan.design>
Subject: RE: Million Air

Thank You Katy.

The following response can be listed as John Whalen's (HCDA Chairperson) comments:

Aloha Katy,

The HCDA received your consultation letter addressed to Chairman John Whalen regarding the Million Air JRF proposal for a Fixed Base Operation (FBO) and Fuel Facility at Kalaeloa Airport (JRF), Oahu, Hawaii. I was directed to follow-up. I provide you with the following comments:

1. The proposed project should be submitted for an HCDA development permit application and Land owners Authorization form should be signed and submitted with the application.
2. What are the safety measures? Explosion, fire, etc.
3. Currently, Midway road is substandard. There is no sidewalks, traffic signals, lighting, etc. What mitigation will the project provide?
4. What is the anticipated traffic impact to the area?
5. What is the plan for public use and access, if any?
6. How does this project meet the Kalaeloa Master Plan and Rules?

Please let me know if you have any questions.

Tesha H. Malama
Kalaeloa Director of Planning and Development
Mail to: Hawaii Community Development Authority
547 Queen Street
Honolulu, Hawaii 96813
Email: tesha.malama@hawaii.gov
Cell: 808-372-3562

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Mr. John Whalen, Chairperson
Hawai'i Community Development Authority
State of Hawai'i
547 Queen Street
Honolulu, HI 96813

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Mr. Whalen:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

(This page intentionally left blank)

From: Katy Moran
To: kamakanaf@oha.org
Cc: Hays, Hannah A; Tuiolosega, Herman; Molly Waller
Subject: Response: OHA Comments Re: EA Exemption for FBO @ Kalaeloa
Date: Friday, October 23, 2020 8:11:00 AM

Dear Kamakana Ferreira,

Thank you for your comments regarding the Fixed Base Operation (FBO) and Fuel Facility project at Kalaeloa Airport. In response to your inquiries in reference to the State Historic Preservation Division and compliance with the HRS 6E and Ka Pa'akai, the project will comply with SHPD requirements upon receipt of their comments during this consultation period.
With respect to comments about the age of past studies, the approving agency, DOTA, has been made aware of OHA concerns. Please contact me with any further questions.

Thank you and have a nice day,

Katy

KATY MORAN
CENTURION PLANNING & DESIGN
325.757.1001 (o) | 808.286.3296 (m)
katy@plan.design

From: Kamakana Ferreira <kamakanaf@oha.org>
Sent: Wednesday, October 21, 2020 16:56
To: Katy Moran
Subject: OHA Comments Re: EA Exemption for FBO @ Kalaeloa

Aloha Ms. Moran,

The Office of Hawaiian Affairs (OHA) is in receipt of your letter dated September 30, 2020, inviting us to consult on the preparation of an environmental assessment (EA) exemption for the Fixed Base Operation (FBO) and Fuel Facility project on State lands at Kalaeloa Airport. Centurion Planning and Design has prepared the exemption on behalf of the applicant, Million Air. While the use of State lands would trigger an environmental review pursuant to Hawai'i Revised Statutes (HRS) Chapter 343, the letter indicates a prior final EA (FEA) for Kalaeloa improvements was completed in June 2010, which included the FBO and fuel facility at the same proposed location. While OHA does not question the propriety of the proposed exemption, we do inquiry whether or not the project must be resubmitted to the State Historic Preservation Division (SHPD) for review pursuant to HRS 6E and whether or not the approving agency has assessed the scope of valued cultural resources in the area.

HRS 6E Review

In review of the 2010 FEA, the archaeological resources section relies on archaeological work that was done as part of the Navy's 1999 final environmental impact statement (FEIS) for the disposal and reuse of the former Naval Air Station Barbers Point. While this work identified 62 archaeological sites, the FEA indicates that none of those sites were in the 2010 project area. The FEA further mentions that SHPD did comment on the 2010 project and indicated that there would be "no effect" to historic properties. The letter sent by you also mentions the Navy's FEIS as justification for saying there are no archaeological resources being on site. Both the FEA and letter do not detail what level of archaeological work (i.e., subsurface testing or pedestrian survey) took place within the project area.

OHA notes that the HRS 6E review process exists independent of whether or not environmental review is required and is triggered any time a permit is applied for. If archaeological resources are to be discussed in the proposed EA exemption, it would be useful to disclose whether new permits are being sought as part of the proposed action and whether or not the HRS 6E process has been triggered. As it has been over 20 years since archaeological work has taken place within the project area and 10 years since SHPD last commented, SHPD could recommend an updated study or field inspection.

Cultural Resources

In the 2010 FEA, there is a section labeled as a "cultural impact assessment" (CIA), yet not methodology was provided on how the assessment was carried out. The section appears to rely on historical military use of the area and the fact that the area is an airport to dismiss the possibility of cultural practices occurring within or around the project area. As part of the 2010 FEA comment process, OHA did question the methodology used for the CIA and requested to review the actual document. In reply, again, the use of the area as an airport was used to justify that access to the project area for cultural purposes would be restricted.

The lack of any formal methodology or explanation specifically targeted at traditional and customary practices could prevent the approving agency from assessing the identity and scope of valued cultural and natural resources in the area. Articles IX and XII of the State of Hawai'i Constitution requires that government agencies must "promote and preserve cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups." Article XII Section 7 of the State of Hawai'i Constitution states:

> "the State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua'a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778…"

In *Ka Pa'akai O Ka 'Aina v. Land Use Commission*, 94 Haw. 31 (2000), hereinafter Ka Pa'akai, the Hawai'i Supreme Court, reiterated the importance of Section 7 and reaffirmed that the State and its agencies are obligated to reasonably protect the traditional and customary rights of Hawaiians. The Supreme Court ruling States that agencies are obligated to make the assessment of cultural practices, independent of a developer or applicant. Thus, despite the exemption currently being sought for the EA process by the applicant, the approving agency is not absolved of the Ka Pa'akai requirements. While information gathered during the HRS 343 process can be used to assist in carrying out this duty, the process to assess cultural practices is to occur independent of the HRS

343 review process.

The Ka Pa'akai court decision set forth that a proper analysis of cultural impacts shall include: 1) the identity and scope of valued cultural, historical, or natural resources in the subject area, including the extent to which traditional and customary native Hawaiian rights are exercised; 2) the extent to which those resources – including traditional and customary native Hawaiian rights – will be affected or impaired by the proposed action; and, 3) the feasible action, if any, to be taken by the (agency) to reasonably protect native Hawaiian rights if they are found to exist. Generally, the "subject area" is not restricted to the project area as areas adjacent to the project area could be indirectly or directly impacted by actions within the project area. OHA recommends that the approving agency carefully evaluate the Ka Pa'akai requirements and whether or not the statements made in the FEA pertaining to cultural practices absolves them of further analysis.

Closing Remarks

Mahalo for the opportunity to comment on the proposed EA exemption. Even though we do not take issue with the proposed exemption, we hope that the applicant and approving agency reviews HRS 6E and Ka Pa'akai requirements carefully to ensure that they are compliant with the law. Should you have any questions, please feel free to reach me through this email address or by phone at 808-597-0227.

Mahalo,
Kamakana C. Ferreira, M.A.
Lead Compliance Specialist
Office of Hawaiian Affairs
560 N. Nimitz Hwy
Honolulu, Hi. 96817

(808)594-0227

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Mr. Kamakana C. Ferreira, M.A., Lead Compliance Specialist
Office of Hawaiian Affairs
State of Hawaii
560 North Nimitz Highway
Honolulu, HI 96817

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Mr. Ferreira:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU
925 DILLINGHAM BOULEVARD, SUITE 200•HONOLULU, HAWAII 96817
PHONE: (808) 768-7762 • FAX: (808) 768-7792
www.honolulu.gov/dcs

KIRK CALDWELL
MAYOR

PAMELA A. WITTY-OAKLAND
DIRECTOR

REBECCA J.'I. SOON
DEPUTY DIRECTOR

October 21, 2020

Ms. Katy Moran
Centurion Planning and Design
69 N. Chadbourne Street
San Angelo, Texas 76903

Dear Ms. Moran:

SUBJECT: Environmental Consultation pursuant to Hawaii Revised Statutes, Section 343-6(a)(2), and Hawai'i Administrative Rules, Section 11-200.1-17(b), for a proposed Fixed Base Operation (FBO) and Fuel Facility at Kalaeloa Airport (JRF), Oahu, Hawai'i

Thank you for your environmental assessment exemption consultation for the development of a FBO and fuel facility at the Kalaeloa Airport on Oahu, Hawai'i pursuant to Hawai'i Revised Statutes, Section 343-6(a)(2), and Hawai'i Administrative Rules, Section 11-200.1-17(b).

Our review of the documents indicated that the proposed project will have no adverse impacts on any Department of Community Services' activities or projects in the surrounding neighborhood.

Thank you for providing us the opportunity to comment on this matter.

Sincerely,

Pamela A. Witty-Oakland
Director

WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Ms. Pamela A. Witty-Oakland, Director
Department of Community Services
City and County of Honolulu
925 Dillingham Boulevard, Suite 200
Honolulu, HI 96817

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Ms. Witty-Oakland:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
DIRECTOR

HAKU MILLES, P.E.
DEPUTY DIRECTOR

October 15, 2020

Centurion Planning and Design
ATTN: Katy Moran
69 N. Chadbourne Street
San Angelo, Texas 76903

Dear Ms. Moran,

Subject: Environmental consultation pursuant to Hawaii Revised Statutes, Section 343-6(a)(2) and Hawaii Administrative Rules, Section 11-200.1-17(b), for a proposed Fixed Base Operation (FBO) and Fuel Facility at Kalaeloa Airport (JRF), Oahu, Hawaii

Thank you for the opportunity to review and comment. The Department of Design and Construction does not have any comments at this time.

Should you have any further questions, please call me at 768-8480.

Sincerely,

for Mark Yonamine, P.E
Director

MY:ms (828235)

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Mr. Mark Yonamine, P.E
Department of Design and Construction
City and County of Honolulu
650 South King Street, 11th Floor
Honolulu, HI 96813

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Mr. Yonamine:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR

KATHY K. SOKUGAWA
ACTING DIRECTOR

TIMOTHY F. T. HIU
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

October 30, 2020 2020/ELOG-1965(GT)

Ms. Katy Moran
Centurion Planning and Design
69 North Chadbourne Street
San Angelo, Texas 76903

Dear Ms. Moran:

SUBJECT: Pre-Assessment Consultation
Chapter 343, Hawaii Revised Statutes
Fixed Base Operation (FBO) and Fuel Facility at Kalaeloa Airport
Midway Street - Kapolei
Tax Map Key 165404 POID

This is in response to your letter (received October 5, 2020), requesting comments on the pre-assessment consultation for the Draft Environmental Assessment (EA) exemption for the proposed FBO and Fuel Facility at Kalaeloa Airport. We have reviewed the information provided and offer the following comments:

1. Planning Division:

   a. Provide more information, i.e., building massing, height limits, usage, or occupancy to determine compliance with the Ewa Development Plan. In general, limit building heights generally not to exceed 60 feet when they consist of large mass. Taller vertical structures are allowed when required as part of an industrial operation, but require a view plane study to be conducted for structures over 100 feet in height to determine if they can be sited or designed to minimize visibility from residential, resort and commercial areas, public rights-of-way, and the shoreline.

   b. Provide landscape screening, consisting of trees and hedges, along street frontages to minimize the visibility of parking, storage, industrial equipment, and operations areas from the street.

   c. Review by the State Historic Preservation Division is required prior to issuance of permits.

2. Civil Engineering Branch: The Project may be required to comply with the prevailing soil erosion and storm water quality standards ("Rules Relating to Water Quality"). Provide list of all required permits.

3. Wasterwater Branch: We have no objections to the proposed FBO and Fuel Facility at Kalaeloa Airport. Submit a Site Development Division Master Application Form for Sewer Connection for any connections to the municipal sewer system.

4. Land Use Permits Division:

   a. Mayor's Directive 18-2, issued on July 16, 2018, requires all City departments and agencies to use the Sea Level Rise (SLR) Guidance and Hawaii SLR Vulnerability and Adaptation Report in planning decisions. Provide update of effects of climate change and SLR.

   b. The site was zoned F-1 Military and Federal District and transferred to the State of Hawaii, Hawaii Community Development Authority (HCDA). The HCDA has zoning and land use jurisdiction over this Project.

Should you have any questions, please contact Gerald Toyomura, of our Urban Design Branch, at 768-8056.

Very truly yours,

for Kathy K. Sokugawa
Acting Director

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Ms. Kathy K. Sokugawa, Acting Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, HI 96813

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Ms. Sokugawa:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

(This page intentionally left blank)

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

KIRK CALDWELL
MAYOR

MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

October 22, 2020

Ms. Katy Moran
Planner
Centurion Planning and Design
69 N. Chadbourne Street
San Angelo, Texas 76903

Dear Ms. Moran:

Subject: Early Consultation for an Environmental Assessment
Proposed Fixed Base Operation and Fuel Facility at Kalaeloa Airport
300 Midway Road
Kapolei, Hawaii 96707
Tax Map Key: 9-1-013: 032

In response to your letter dated September 30, 2020, regarding the abovementioned subject, the Honolulu Fire Department (HFD) reviewed the submitted information and requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet (46 meters) from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)

   A fire department access road shall extend to within 50 feet (15 meters) of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; 2012 Edition, Section 18.2.3.2.1.)

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet (45,720 millimeters) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; 2012 Edition, Section 18.3.1, as amended.)

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)

4. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Battalion Chief Wayne Masuda of our Fire Prevention Bureau at 808-723-7151 or wmasuda@honolulu.gov.

Sincerely,

JASON SAMALA
Assistant Chief

JS/EO:bh

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Mr. Jason Samala, Assistant Chief
Honolulu Fire Department
City and County of Honolulu
636 South Street
Honolulu, HI 96813-5007

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Mr. Samala:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

(This page intentionally left blank)

POLICE DEPARTMENT

CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulupd.org

KIRK CALDWELL
MAYOR

SUSAN BALLARD
CHIEF

JOHN D. McCARTHY
CLYDE K. HO
DEPUTY CHIEFS

OUR REFERENCE EO-DK

October 9, 2020

SENT VIA EMAIL

Ms. Katy Moran
Katy@plan.design

Dear Ms. Moran:

This is in response to your letter of September 30, 2020, requesting input on an Environmental Assessment Exemption for a proposed Fixed-Base Operation and Fuel Facility at Kalaeloa Airport located on Oahu, Hawaii.

The Honolulu Police Department has reviewed the project and does not have any comments or concerns at this time.

If there are any questions, please call Major Craig Uehira of District 8 (Waianae/ Kapolei) at (808) 723-8400.

Thank you for the opportunity to review this project.

Sincerely,

RADE K. VANIC
Assistant Chief of Police
Support Services Bureau

Serving and Protecting With Aloha

WILSON OKAMOTO CORPORATION
INNOVATORS · PLANNERS · ENGINEERS

10613-01
February 1, 2021

Mr. Rade K. Vanic, Assistant Chief of Police
Honolulu Police Department
Support Services Bureau
1100 Kamokila Boulevard
Kapolei, HI 96707

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Mr. Vanic:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

GACH
General Aviation Council of Hawaii
pilots@gahawaii.com 90 Nakolo Place, Honolulu, Hawaii 96819

October 29, 2020

Katy Moran
Centurion Planning and Design
69 N. Chadbourne Street
San Angelo, TX. 76903

To All Those Concerned --

I am the President of General Aviation Council of Hawaii, a nonprofit advisory group for all General Aviation in Hawaii. However, I am writing this not as an aviation advisor but as a long term and involved resident of Hawaii. You and your Board should be aware that Hawaii is a very different place to do business, with unusual sensibilities and priorities. In general, you can assume that a vocal portion of the populace will be hostile to any development or new business venture, particularly when a Mainland company is involved.

I strongly advise you to reconsider your decision to ask for an exemption to the requirement to conduct an Environmental Impact Statement for your proposed project. As an illustration of the possible consequences of such an action, allow me to relate the story of the demise of Hawaii Superferry.

As conceived by its founders, Superferry service would provide daily car ferry service among the Hawaiian Islands. The concept met with wide approval from most State residents and lawmakers, including enthusiastic backing of the then-governor, Republican Linda Lingle. The company secured investors and financing and contracted for the construction of two high-speed catamarans in January 2004.

However, some environmentalists and certain anti-development native Hawaiian peoples in Kauai and Maui were not at all happy with this concept.

In 2005, the state Department of Transportation asked a circuit judge on Maui for a waiver of a requirement to perform a second environment impact assessment of necessary improvements to Kahului Harbor on Maui. The waiver was granted and work proceeded. However, a coalition of environmental and native Hawaiian groups determined that this was a possible avenue to put an end to this entire service, and they began work on a challenge to this ruling.

Just before the launch date for the interisland service in late August 2007, the Hawaii Supreme Court ruled that the state Department of Transportation had erred in not requiring a second environmental impact assessment for the harbor improvements. The ferry service operated for one day before a temporary restraining order was issued that barred the Superferry from accessing Kahului Harbor, causing service to Maui to be suspended. Meanwhile, protestors in Kauai forced the Superferry to turn around without entering its harbor. The company then suspended service to Kauai also.

The company's defense against both the protestors and the legal challenges was eerily similar to the reasoning presented in your Environmental Consultation – essentially, it's all been done before, so why would there be a problem? Hawaii had previously had high-speed interisland ferries (in the 1970s) and there was literally a fleet of cargo ships traveling between islands and using all the same ports every single day. In the end, none of that mattered.

In October 2007, a special legislative session was called by the governor in which the State Senate approved a bill to allow "large capacity ferry vessels" to operate between ports in the Hawaiian Islands while an environmental statement was prepared. It was signed into law on November 2, 2007.

The same coalition of environmental and native Hawaiian groups returned to Court. In March 2009, the Hawaii Supreme Court ruled that allowing the Superferry to operate prior to the completion of the environmental study was unconstitutional.

The company immediately suspended operations and laid off all of its employees. Two months later, it filed for Chapter 11 bankruptcy protection. The two ferries were later sold for a total of $35 million, a fraction of the $140 million that they cost to build.

The overall point is that environmental and anti-business interests hold unusual sway in Hawaii, and they can mobilize impressive resources when they are riled up. So best not to give them any reason ever to get riled up. My advice to you is to bite the bullet (so to speak), and just do the EIS.

You can reach me at (808) 284-0324 if you have any questions. Thank you for this opportunity to express my opinion.

Sincerely,

Pat McNamee
President

pattherealpilot@aol.com

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
February 1, 2021

Mr. Pat McNamee, President
General Aviation Council of Hawaii
90 Nakolo Place
Honolulu, HI 96819

Subject: Draft Environmental Assessment:
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Tax Map Keys (TMK): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Dear Mr. McNamee:

Thank you for participating in the early consultation process for the subject proposed action. We acknowledge your comments provided in response to the consultation inquiry made in association with the processing of an Environmental Assessment (EA) exemption for the proposed action. Upon review of the request to declare the project exempt, however, HDOT-A determined, through its judgment and experience, that the project would not be eligible for an exemption and required the Applicant prepare an EA. Furthermore, HDOT-A determined that the previously conducted consultation effort would serve to fulfill early consultation requirements for this subject EA process pursuant to HAR §11-200.1-18(a).

Your comments have been considered in the preparation of the subject Draft EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1, Section 24. Your original comment letter, along with this response, will be reproduced and included in the forthcoming Draft EA. The Draft EA will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director - Planning

cc: Scott Freeman, Freeman Holdings of Hawaii dba Million Air Honolulu
Herman Tuiolosega, State of Hawaii Department of Transportation – Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

(This page intentionally left blank)

APPENDIX B

Draft Environmental Assessment Consultation Comments and Responses

(This page intentionally left blank)

From: Wong, Gordon (FAA) <Gordon.Wong@faa.gov>
Sent: Tuesday, March 9, 2021 11:05 AM
To: Public Comment; herman.tuiolosega@hawaii.gov; Lynette.Kawaoka@hawaii.gov; Severn, Raymond S
Cc: Nishimura, Kevin H (FAA); Evans, Kimberly (FAA); Salas, Carlos H (FAA)
Subject: FW: Million Air - JRF FBO and FF Facility
Attachments: image2021-02-19-102105.pdf

The Hawaii Department of Transportation, Airports Division (HDOT-A), as the airport sponsor, will need to provide the Federal Aviation Administration (FAA), Honolulu Airports District Office the information necessary for the FAA to conduct an analysis to determine what aspects of the proposed project the FAA is authorized to review based on Section 163 of the FAA Reauthorization Act of 2018. Based on this determination, the FAA can determine what proposed project components would be subject to federal environmental review requirements under the National Environmental Policy Act (NEPA) and the level of NEPA analysis required. The FAA's NEPA requirements are set forth in FAA Order 1050.1F and FAA Order 5050.4B. Consultations with resources agencies would be required to support the environmental review process and would include, but not be limited to, Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act.

In addition, under Title 14 of the Code of Federal Regulations Part 77 the project proponent must submit information to the FAA so that our agency can analyze what potential effects the proposed construction and operation of the facility may have on the navigable airspace. This information is submitted to our agency on FAA Form 7460-1.

Should you have any specific questions on NEPA, please contact Mr. Kevin Nishimura (kevin.h.nishimura@faa.gov), FAA Environmental Protection Specialist.

Gordon K Wong
Manager, FAA Honolulu ADO

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Gordon K. Wong, Manager
Federal Aviation Administration
Honolulu Airports District Office
Email: Gordon.Wong@faa.gov

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Wong:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *The Hawaii Department of Transportation, Airports Division (HDOT-A), as the airport sponsor, will need to provide the Federal Aviation Administration (FAA), Honolulu Airports District Office the information necessary for the FAA to conduct an analysis to determine what aspects of the proposed project the FAA is authorized to review based on Section 163 of the FAA Reauthorization Act of 2018. Based on this determination, the FAA can determine what proposed project components would be subject to federal environmental review requirements under the National Environmental Policy Act (NEPA) and the level of NEPA analysis required. The FAA's NEPA requirements are set forth in FAA Order 1050.1F and FAA Order 5050.4B. Consultations with resources agencies would be required to support the environmental review process and would include, but not be limited to, Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act.*

Response 1: We acknowledge your comment that HDOT-A, as the airport sponsor, will need to provide the FAA, Honolulu Airports District Office with the information necessary for the FAA to conduct an analysis to determine what aspects of the proposed project the FAA is authorized to review based on Section 163 of the FAA Reauthorization Act of 2018. We understand that based on the findings of this analysis, project components could be subject to federal environmental review requirements under NEPA. Additionally, consultation with resource agencies may be required to support the environmental review process and may include, but is not limited to, Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act. We also understand that should consultation be required it will be undertaken by the FAA as the authorizing federal agency under a separate process. It is anticipated that the project will have no adverse effects on historic properties or endangered species. The Preface of the Final EA has been updated with this information and the Applicant will continue to coordinate with HDOT-A and the FAA regarding federal environmental review and consultation requirements that may be applicable to this project.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 2: *In addition, under Title 14 of the Code of Federal Regulations Part 77 the project proponent must submit information to the FAA so that our agency can analyze what potential effects the proposed construction and operation of the facility may have on the navigable airspace. This information is submitted to our agency on FAA Form 7460-1.*

Response 2: We acknowledge your comment that FAA Form 7460-1 must be submitted by the Applicant prior to construction of the proposed action so that the FAA can analyze what potential effects the proposed construction and operation of the facility may have on the navigable airspace. We would like to note that FAA Form 7460-1 has been listed on the list of Required Permits and Approvals in Section 4.3 of the EA.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai‘i 96850

In Reply Refer To:
01EPIF00-2021-TA-0184

March 3, 2021

Mr. Keola Cheng
Wilson Okamoto Corporation
1907 S. Beritania St; Suite 400
Honolulu, HI 96826

Subject: Response to Request for Technical Assistance on Millian Air – JRF FBO and FF Facility at Kalaeloa Aiport, Kalaeloa, O‘ahu

Dear Mr. Cheng:

Thank you for your recent correspondence requesting technical assistance on species biology, habitat, or life requisite requirements. The Pacific Islands Fish and Wildlife Office (PIFWO) of the U.S. Fish and Wildlife Service (Service) appreciates your efforts to avoid or minimize effects to protected species associated with your proposed actions. We provide the following information for your consideration under the authorities of the Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq.*), as amended.

Due to significant workload constraints, PIFWO is currently unable to specifically address your information request. The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. Based on your project location and description, we have noted the species most likely to occur within the vicinity of the project area, in the '**Occurs In or Near Project Area'** column. Please note this list is not comprehensive and should only be used for general guidance. We have added to the PIFWO website, located at https://www.fws.gov/pacificislands/promo.cfm?id=177175840 recommended conservation measures intended to avoid or minimize adverse effects to these federally protected species and best management practices to minimize and avoid sedimentation and erosion impacts to water quality. If your project occurs on the island of Hawai‘i, we have also enclosed our biosecurity protocol for activities in or near natural areas.

If you are representing a federal action agency, please request an official species list following the instructions at our PIFWO website https://www.fws.gov/pacificislands/articles.cfm?id=149489558. You can find out if your project occurs in or near designated critical habitat here: https://ecos.fws.gov/ipac/.

Under section 7 of the ESA, it is the Federal agency's (or their non-Federal designee) responsibility to make the determination of whether or not the proposed project "may affect" federally listed species or designated critical habitat. A "may affect, not likely to adversely affect" determination is appropriate when effects to federally listed species are expected to be discountable (i.e., unlikely to occur), insignificant (minimal in size), or completely beneficial. This conclusion requires written concurrence from the Service. If a "may affect, likely to adversely affect" determination is made, then the Federal agency must initiate formal consultation with the Service. Projects that are determined to have "no effect" on federally listed species and/or critical habitat do not require additional coordination or consultation.

Implementing the avoidance, minimization, or conservation measures for the species that may occur in your project area will normally enable you to make a "may affect, not likely to adversely affect" determination for your project. If it is determined that the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If the proposed project is funded, authorized, or permitted by a Federal agency, then that agency should consult with us pursuant to section 7(a)(2) of the ESA. If no Federal agency is involved with the proposed project, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. A section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats and defines measures to minimize and mitigate those adverse effects.

We appreciate your efforts to conserve endangered species. We regret that we cannot provide you with more specific protected species information for your project site. If you have questions that are not answered by the information on our website, you can contact PIFWO at (808) 792-9400 and ask to speak to the lead biologist for the island where your project is located.

Sincerely,

Aaron Nadig

Digitally signed by Aaron Nadig
Date: 2021.03.03 10:54:24 -10'00'

Island Team Manager
Pacific Islands Fish and Wildlife Office

Enclosure (2)

The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. For your guidance, we have marked species that may occur in the vicinity of your project, this list is not comprehensive and should only be used for general guidance.

Enclosure 1. Federal Status of Animal Species

Scientific Name	Common Name / Hawaiian Name	Federal Status	May Occur In Project Area
Mammals			
Lasiurus cinereus semotus	Hawaiian hoary bat/ʻōpeʻapeʻa	E	☒
Reptiles			
Chelonia mydas	green sea turtle/honu - Central North Pacific distinct population segment (DPS)	T	☐
Eretmochelys imbricata	hawksbill sea turtle/ honu ʻea or ʻea	E	☐
Birds			
Anas wyvilliana	Hawaiian duck/koloa	E	☐
Branta sandvicensis	Hawaiian goose/nēnē	T	☐
Fulica alai	Hawaiian coot/ʻalae keʻokeʻo	E	☐
Gallinula galeata sandvicensis	Hawaiian gallinule/ʻalae ʻula	E	☐
Himantopus mexicanus knudseni	Hawaiian stilt/aeʻo	E	☒
Oceanodroma castro	band-rumped storm-petrel Hawaiʻi DPS/ʻakēʻakē	E	☐
Pterodroma sandwichensis	Hawaiian petrel/ʻuaʻu	E	☐
Puffinus auricularis newelli	Newell's shearwater/ʻaʻo	T	☐
Ardenna pacificus	wedge-tailed shearwater/ʻuaʻu kani	MBTA	☐
Buteo solitarius	Hawaiian hawk/ʻio	MBTA	☐
Gygis alba	white tern/manu-o-kū	MBTA	☐
Insects			
Manduca blackburni	Blackburn's sphinx moth	E	☐
Megalagrion pacificum	Pacific Hawaiian damselfly	E	☐
Megalagrion xanthomelas	orangeblack Hawaiian damselfly	E	☐
Megalagrion nigrohamatum nigrolineatum	blackline Hawaiian damselfly	E	☐

Enclosure 2. Federal Status of Plant Species

Plants				
Scientific Name	Common Name or Hawaiian Name	Federal Status	Locations	May Occur In Project Area
Abutilon menziesii	koʻoloaʻula	E	O, L, M, H	☐
Achyranthes splendens var. *rotundata*	ʻewa hinahina	E	O	☐
Bonamia menziesii	no common name	E	K, O, L, M, H	☐
Canavalia pubescens	ʻāwikiwiki	E	Ni, K, L, M	☐
Colubrina oppositifolia	kauila	E	O, M, H	☐
Cyperus trachysanthos	puʻukaʻa	E	K, O	☐
Gouania hillebrandii	no common name	E	Mo, M	☐
Hibiscus brackenridgei	maʻo hau hele	E	O, Mo, L, M, H	☐
Ischaemum byrone	Hilo ischaemum	E	K, O, Mo, M, H	☐
Isodendrion pyrifolium	wahine noho kula	E	O, H	☐
Marsilea villosa	ʻihiʻihi	E	Ni, O, Mo	☐
Mezoneuron kavaiense	uhiuhi	E	O, H	☐
Nothocestrum breviflorum	ʻaiea	E	H	☐
Panicum fauriei var. *carteri*	Carter's panicgrass	E	Molokini Islet (O), Mo	☐
Panicum niihauense	lauʻehu	E	K	☐
Peucedanum sandwicense	makou	E	K, O, Mo, M	☐
Pleomele (Chrysodracon) hawaiiensis	halapepe	E	H	☐
Portulaca sclerocarpa	ʻihi	E	L, H	☐
Portulaca villosa	ʻihi	E	Le, Ka, Ni, O, Mo, M, L, H, Nihoa	☐
Pritchardia affinis (maideniana)	loulu	E	H	☐
Pseudognaphalium sandwicensium var. *molokaiense*	ʻenaʻena	E	Mo, M	☐
Scaevola coriacea	dwarf naupaka	E	Mo, M	☐
Schenkia (*Centaurium*) *sebaeoides*	ʻāwiwi	E	K, O, Mo, L, M	☐
Sesbania tomentosa	ʻōhai	E	Ni, Ka, K, O, Mo, M, L, H, Necker, Nihoa	☐
Tetramolopium rockii	no common name	T	Mo	☐
Vigna o-wahuensis	no common name	E	Mo, M, L, H, Ka	☐

Location key: O=Oʻahu, K=Kauaʻi, M=Maui, H=island of Hawaiʻi, L=Lānaʻi, Mo=Molokaʻi, Ka=Kahoʻolawe, Ni=Niʻihau, Le=Lehua

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Aaron Nadig, Island Team Manager
U.S. Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Nadig:

Thank you for your comments dated March 3, 2021 (Reference No. 01EPIF00-2021-TA-0184) regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Due to significant workload constraints, PIFWO is currently unable to specifically address your information request. The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. Based on your project location and description, we have noted the species most likely to occur within the vicinity of the project area, in the 'Occurs In or Near Project Area' column. Please note this list is not comprehensive and should only be used for general guidance. We have added to the PIFWO website, located at https://www.fws.gov/pacificislands/promo.cfm?id=177175840 recommended conservation measures intended to avoid or minimize adverse effects to these federally protected species and best management practices to minimize and avoid sedimentation and erosion impacts to water quality. If your project occurs on the island of Hawai'i, we have also enclosed our biosecurity protocol for activities in or near natural areas.*

Response 1: We appreciate the information and resources that have been provided by your office. Your letter notes that the following species are most likely to occur within the vicinity of the project area based on the project location and description: Hawaiian hoary bat, or ʻōoeʻapeʻa, (*Lasiurus cinereus semotus*) and Hawaiian stilt, or aeʻo (*Himantopus mexicanus knudseni*).

As noted on the website link provided, the Hawaiian hoary bat roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season, there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away. Additionally, Hawaiian hoary bats forage for insects from as low as 3 feet to higher than 500 feet above the ground and can become entangled in barbed wire used for fencing.

The Hawaiian stilt is considered a Hawaiian waterbird. Listed Hawaiian waterbirds are found in fresh and brackish-water marshes and natural or man-made ponds. Hawaiian stilts may also be found wherever ephemeral or persistent standing water may occur. Threats to these species include non-native predators, habitat loss, and habitat degradation. If a project creates, either purposefully or inadvertently, any kind of temporary or permanent standing water, including excavation or grading for construction or roadwork, then it may attract Hawaiian waterbirds to the site. In particular, the Hawaiian stilt is known to nest in sub-optimal locations (e.g., any ponding water), if water is present. Hawaiian waterbirds attracted to sub-optimal habitat may suffer adverse impacts, such as predation and reduced reproductive success, and thus the project may create an attractive nuisance.

Regarding the Hawaiian hoary bat, HDOT-A conducted wildlife survey at Kalaeloa Airport (JRF) from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. In addition, the proposed FBO and Fuel Farm Facility sites are located in a pre-disturbed developed area on vacant land within the JRF property. There are no tall trees present within the project site and the proposed action will have no effect on tall trees located offsite that may be used by the Hawaiian hoary bat for habitat or foraging. Therefore, the Project will have no adverse effects to the Hawaiian hoary bat.

Regarding the Hawaiian stilt, there are no perennial streams, ponds, or other surface water resources on or within close proximity of the project site that could be used by waterbirds for habitat or foraging. Also, the proposed action will not involve creating habitat for waterbirds. Implementation of the proposed action is not likely to adversely affect federally protected species. Other rare, threatened, or endangered fauna are not known to utilize the site for habitat or foraging purposes. Section 3.5.1 (Flora and Fauna) of the Final EA has been updated with the foregoing information.

Also, the project site is not located on the island of Hawai'i and the biosecurity protocol for activities in or near natural areas enclosed with your letter are not be applicable to the proposed action.

Comment 2: *If you are representing a federal action agency, please request an official species list following the instructions at our PIFWO website https://www.fws.gov/pacificislands/articles.cfm?id=149489558. You can find out if your project occurs in or near designated critical habitat here: https://ecos.fws.gov/ipac/.*

Under section 7 of the ESA, it is the Federal agency's (or their non-Federal designee) responsibility to make the determination of whether or not the proposed project "may affect" federally listed species or designated critical habitat. A "may affect, not likely to adversely affect" determination is appropriate when effects to federally listed species are expected to be discountable (i.e., unlikely to occur), insignificant (minimal in size), or completely beneficial. This conclusion requires written concurrence from the Service. If a "may affect, likely to adversely affect" determination is made, then the Federal agency must initiate formal consultation with the Service. Projects that are determined to have "no effect" on federally listed species and/or critical habitat do not require additional coordination or consultation.

Implementing the avoidance, minimization, or conservation measures for the species that may occur in your project area will normally enable you to make a "may affect, not likely to adversely affect" determination for your project. If it is determined that the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If the proposed project is funded, authorized, or permitted by a Federal agency, then that agency should consult with us pursuant to section 7(a)(2) of the ESA. If no Federal agency is involved with the proposed project, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. A section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats and defines measures to minimize and mitigate those adverse effects.

Response 2: We acknowledge your comment and note that we are not representing a federal action agency nor will the proposed action involve the use of federal funds. We understand that pursuant to Section 163 of the FAA Reauthorization Act of 2018, the FAA may determine that project components could be subject to federal environmental review requirements under NEPA. Additionally, consultation with resource agencies may be required to support the environmental review process and may include, but not be limited to, Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act. We understand that should consultation be required it will be undertaken by the FAA as the authorizing federal agency under a separate process. It is anticipated that the project will have no adverse effects on historic properties or endangered species. The Applicant will continue to coordinate with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) and the FAA regarding federal environmental review and consultation requirements that may be applicable to this project.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

DAVID Y. IGE
GOVERNOR

CURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

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

(P) 21.030

MAR - 4 2021

Mr. Keola Cheng, Director-Planning
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
MAR 08 2021
WILSON OKAMOTO CORPORATION

Dear Mr. Cheng:

Subject: Draft Environmental Assessment
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
TMK: (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

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

If you have any questions, please call Dennis Chen of the Planning Branch at 586-0491.

Sincerely,

CHRISTINE L. KINIMAKA
Public Works Administrator

GT/DE:mo
c: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, DOT Airpors Div

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Christine L. Kinimaka
State of Hawaii
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawaii 96810-0119

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Kinimaka:

Thank you for your comments dated March 4, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge that the proposed project does not impact any of the Department of Accounting and General Services' (DAGS) existing facilities or properties, and that DAGS has no comments to offer at this time. A record of your comments has been appended to the Final EA in Appendix B.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 10, 2021

LD 0185

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400 *Via email: publiccomment@wilsonokamoto.com*
Honolulu, HI 96826

Attention: Million Air – JRF FBO and FF Facility

Dear Sirs:

SUBJECT: **Draft Environmental Assessment, Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility**
Kalaeloa, Island of Oahu, Hawaii; TMK: (1) 9-1-013:032

Thank you for the opportunity to review and comment on the subject project. The Land Division of the Department of Land and Natural Resources (DLNR) distributed copies of your request to various DLNR divisions, as indicated on the attached, for their review and comment.

Attached are responses received from our (a) Engineering Division, and (b) Land Division, Oahu District. Should you have any questions, please feel free to contact Barbara Lee via email at barbara.j.lee@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Attachments
Cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 22, 2021

LD 0185

MEMORANDUM

FROM:

~~TO:~~ **DLNR Agencies:**
__Div. of Aquatic Resources *(via email: kendall.l.tucker@hawaii.gov)*
__Div. of Boating & Ocean Recreation
_X_ Engineering Division *(via email: DLNR.Engr@hawaii.gov)*
_X_ Div. of Forestry & Wildlife *(via email: Rubyrosa.T.Terrago@hawaii.gov)*
__Div. of State Parks
_X_ Commission on Water Resource Management *(via email: DLNR.CWRM@hawaii.gov)*
__Office of Conservation & Coastal Lands
_X_ Land Division – Oahu District *(via email: DLNR.Land@hawaii.gov)*

TO:

~~FROM:~~ Russell Y. Tsuji, Land Administrator Russell Tsuji
SUBJECT: **Draft Environmental Assessment (DEA), Million Air – Kalaeloa Airport Fixed base Operation and Fuel Farm Facility**
LOCATION: Kalaeloa, Island of Oahu, Hawaii; TMK: (1) 9-1-013:032 and 076
APPLICANT: **Wilson Okamoto Corporation on behalf of Freeman Holdings of Hawaii, LLC, dba Million Air Honolulu**

Transmitted for your review and comment is information on the above-referenced subject. The DEA was published on February 08, 2021 in the Office of Environmental Quality Control's periodic bulletin, The Environmental Notice, at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2021-02-08-TEN.pdf

Please submit any comments by **March 09, 2021** to DLNR.Land@hawaii.gov, and copied to barbara.j.lee@hawaii.gov. If no response is received by this date, we will assume your agency has no comments. If you have any questions, please contact Barbara Lee directly via email at barbara.j.lee@hawaii.gov. Thank you.

( ) We have no objections.
( ) We have no comments.
( ) We have no additional comments.
(✓) Comments are attached.

Signed: GSC
Print Name: Carty S. Chang, Chief Engineer
Division: Engineering Division
Date: Feb 26, 2021

Attachments
Cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji
Ref: Draft Environmental Assessment (DEA), Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Location: Kalaeloa, Island of Oahu, Hawaii
TMK(s): (1) 9-1-013:032 and 076
Applicant: Wilson Okamoto Corporation on behalf of Freeman Holdings of Hawaii, LLC, dba Million Air Honolulu

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiinfip.org/FHAT).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- Kauai: County of Kauai, Department of Public Works (808) 241-4896.

Signed: _____
CARTY S. CHANG, CHIEF ENGINEER

Date: Feb 26, 2021

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 22, 2021

LD 0185

MEMORANDUM

TO: **DLNR Agencies:**
__Div. of Aquatic Resources *(via email: kendall.l.tucker@hawaii.gov)*
__Div. of Boating & Ocean Recreation
X Engineering Division *(via email: DLNR.Engr@hawaii.gov)*
X Div. of Forestry & Wildlife *(via email: Rubyrosa.T.Terrago@hawaii.gov)*
__Div. of State Parks
X Commission on Water Resource Management *(via email: DLNR.CWRM@hawaii.gov)*
__Office of Conservation & Coastal Lands
X Land Division – Oahu District *(via email: DLNR.Land@hawaii.gov)*

FROM: Russell Y. Tsuji, Land Administrator Russell Tsuji
SUBJECT: **Draft Environmental Assessment (DEA), Million Air – Kalaeloa Airport Fixed base Operation and Fuel Farm Facility**
LOCATION: Kalaeloa, Island of Oahu, Hawaii; TMK: (1) 9-1-013:032 and 076
APPLICANT: **Wilson Okamoto Corporation on behalf of Freeman Holdings of Hawaii, LLC, dba Million Air Honolulu**

Transmitted for your review and comment is information on the above-referenced subject. The DEA was published on February 08, 2021 in the Office of Environmental Quality Control's periodic bulletin, The Environmental Notice, at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2021-02-08-TEN.pdf

Please submit any comments by **March 09, 2021** to DLNR.Land@hawaii.gov, and copied to barbara.j.lee@hawaii.gov. If no response is received by this date, we will assume your agency has no comments. If you have any questions, please contact Barbara Lee directly via email at barbara.j.lee@hawaii.gov. Thank you.

( ) We have no objections.
(☑) We have no comments.
( ) We have no additional comments.
( ) Comments are attached.

Signed: _____ BC
Print Name: Patti Miyashiro
Division: DLNR-LAND DIV-ODLO
Date: Feb 23, 2021

Attachments
Cc: Central Files

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Russell Tsuji, Land Administrator
State of Hawaii
Department of Land and Natural Resources
Land Division
P.O. Box 621
Honolulu, Hawaii 96809

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Tsuji:

Thank you for your letter dated March 10, 2021 (Reference No. LD 0185) containing comments from the State of Hawaii Department of Land and Natural Resources (DLNR) Engineering Division dated February 26, 2021 and Land Division, Oahu District dated February 23, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Engineering Division

Comment 1: *The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.*

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiinfip.org/FHAT).

Response 1: We acknowledge your comment and note that Section 3.4.2 (Flood and Tsunami Hazard) of the EA states that the project is located within Zone D, unstudied areas where flood hazards are undetermined, but flooding is possible. The proposed action will not increase flood risks or cause any adverse flood-related impacts at the project site or at lower elevation properties. For development of the proposed facilities, all drainage improvements, excavation and grading will be coordinated with the

appropriate agencies during permitting and construction in order to ensure that implementation of the proposed action will not result in significant impacts regarding flood and tsunami hazards.

Land Division, Oahu District

We acknowledge the DLNR Land Division, Oahu District has no comments at this time.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

PHONE (808) 594-1888 FAX (808) 594-1938

STATE OF HAWAI'I
OFFICE OF HAWAIIAN AFFAIRS
560 N. NIMITZ HWY., SUITE 200
HONOLULU, HAWAI'I 96817

HRD21-9486

March 5, 2021

Keola Cheng
Director – Planning, Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, HI 96826

Re: Draft Environmental Assessment
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Honouliuli Ahupua'a, 'Ewa Moku, O'ahu Mokupuni
Tax Map Key: (1) 9-1-013: 032 (por.) and 076 (por.)

Aloha e Mr. Cheng:

The Office of Hawaiian Affairs (OHA) is in receipt of your February 1, 2021 letter informing us about the release of the February 2021 draft environmental assessment (DEA) for the proposed Kalaeloa Airport Fixed Base Operation (FBO) and Fuel Farm Facility project on O'ahu. Wilson Okamoto Corporation was contracted to complete the DEA on behalf of Freeman Holdings of Hawaii, LLC, (dba Million Air Honolulu) pursuant to Hawai'i Revised Statutes (HRS) 343. The land is currently leased from the State of Hawai'i Department of Transportation (HDOT). The proposed action may include the following improvements: a 30,000 sq.ft. general aircraft hangar; a 8,000 sq.ft. two-story office area; 2,000 sq.ft. ground service maintenance area; eight 30,000 gallon Jet A Fuel above-ground, horizontal storage tanks; a 15,000 gallon Aviation gas tank; two 500-gallon diesel tanks; and, two 500-gallon gas tanks for motor vehicles.

Previously, OHA comment was sought as part of the early consultation process for a possible HRS 343 exemption in October 2020 since a Final EA (FEA), which included the current project scope, was published for the Kalaeloa Airport Development Plan in June 2010. At the time, OHA inquired via email as to whether HRS 6E, historic preservation review, would still be carried out for the project even if the HRS 343 exemption was granted by the approving agency, HDOT. We further encouraged additional consultation to better understand possible impacts to cultural resources as the project appeared to be relying on a decade-old cultural impact assessment (CIA) from the 2010 FEA. In reply, OHA was informed that the project will comply with HRS 6E and that the applicant would defer to HDOT on whether or not further consultation was needed to better understand possible impacts to cultural resources. Ultimately, HDOT chose not to exempt the project from HRS 343.

Your February 1st letter does acknowledge OHA's prior inquiry and indicates that our comments have been considered in preparation of the DEA. However, while OHA's questions are captured in the appendix of the DEA, the sections within the body of the DEA discussing archaeological and cultural resources appear to ignore our concerns. Thus, OHA would like to recapture our concerns here regarding HRS 6E review and cultural resources.

HRS 6E Review

The archaeological resources section indicates that archaeological work was done as part of the United States (U.S.) Navy's 1999 final environmental impact statement (FEIS) for the disposal and reuse of the former Naval Air Station Barbers Point. While this work identified 62 archaeological sites that are eligible for the National Register of Historic Places (NRHP), the DEA indicates that none of those sites are within the project area and that subsequently there will be no adverse impact to historic properties. There is no discussion on the archaeological techniques (i.e., pedestrian survey, subsurface testing) used to identify sites or any mention that the project will undergo HRS 6E review. This is basically the same information that was provided in the 2010 FEA. However, while the current DEA is silent on consultation with the State Historic Preservation Division (SHPD), the FEA did mention that the SHPD commented on the project in 2010 and concurred with a determination of no effect to historic properties.

As it has been over 20 years since archaeological work has taken place within the project area and 10 years since the SHPD last commented, SHPD could recommend an updated study or field inspection. Occasionally, projects with extreme delays may be required to undergo the historic preservation review process again, to ensure that the newest information and technology are applied to the detection, assessment, and mitigation of potential impacts to invaluable and irreplaceable historic and cultural sites and resources, as well as to iwi kūpuna which have been proven to exist in the extensive sinkholes and karst features of Kalaeloa despite extensive surface alteration and disturbance in the past. Furthermore, OHA was reassured that the project would undergo HRS 6E review; thus, we believe it is premature and misleading for the DEA to state that there is no adverse impact to historic properties. OHA recommends that the DEA make specific mention of the need to conduct HRS 6E review in the discussion on archaeological resources and that an adverse effect determination is still pending.

Cultural Resources

There is a section in the DEA labeled as "cultural resources", yet no methodology is provided on how cultural resources were identified and how cultural impacts were assessed. The section appears to rely on historical military use of the area and the fact that the area is an airport to dismiss the possibility of cultural practices occurring within or around the project area. As part of the 2010 FEA comment process, OHA did question the methodology used for the cultural impact assessment (CIA) and requested to review the actual document. In reply, again, the use of the area as an airport was used to justify that access to the project area for cultural purposes would be restricted. No CIA or cultural analysis was provided to OHA for review.

Guidelines for assessing cultural impacts are provided by the Office of Environmental Quality Control (OEQC) in the *Guide to Implementation and Practice of the Hawaii Environmental Policy Act*, Exhibit 1-1, 2012 Edition. Of relevance to this project, these guidelines calls for an analysis of cultural practices and resources located within "the broad geographical area in which the proposed project is located, as well as their direct or indirect significance or connection to the project site." Furthermore, the process should involve an attempt to consult with community folks and cultural practitioners to ascertain ethnographic information on cultural resources and practices. As the DEA does not consider cultural impacts to the broader area beyond the project site and fails to mention any type of outreach specific to cultural related consultation, we encourage the applicant to complete a cultural analysis or cultural impact assessment (CIA) that is compliant with these guidelines and minimally reach out to the Kalaeloa Legacy and Heritage Foundation.

OHA would further like to remind the applicant that the lack of any formal methodology or explanation specifically targeted at traditional and customary practices could prevent the approving agency, HDOT, from assessing the identity and scope of valued cultural and natural resources in the area. Articles IX and XII of the State of Hawai'i Constitution requires that government agencies must "promote and preserve cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups." Article XII Section 7 of the State of Hawai'i Constitution states:

> "the State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua'a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778…"

In *Ka Pa'akai O Ka 'Aina v. Land Use Commission*, 94 Haw. 31 (2000), hereinafter Ka Pa'akai, the Hawai'i Supreme Court, reiterated the importance of Section 7 and reaffirmed that the State and its agencies are obligated to reasonably protect the traditional and customary rights of Hawaiians. The Supreme Court ruling States that agencies are obligated to make the assessment of cultural practices, independent of a developer or applicant. Typically, information gathered during a CIA or cultural impact study during HRS 343 can help to inform the approving agency during the Ka Pa'akai process. However, there is no apparent methodology for how cultural impacts were assessed within the DEA.

The Ka Pa'akai court decision set forth that a proper analysis of cultural impacts shall include: 1) the identity and scope of valued cultural, historical, or natural resources in the subject area, including the extent to which traditional and customary native Hawaiian rights are exercised; 2) the extent to which those resources – including traditional and customary native Hawaiian rights – will be affected or impaired by the proposed action; and, 3) the feasible action, if any, to be taken by the (agency) to reasonably protect native Hawaiian rights if they are found to exist. Generally, the "subject area" is not restricted to the project area as areas adjacent to the project area could be indirectly or directly impacted by actions within the project area. OHA recommends that the applicant work with the approving agency, HDOT, to carefully evaluate the Ka Pa'akai requirements and the OEQC guidelines for CIAs.

Keola Cheng – Wilson Okamoto Corporation
DEA for Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
March 5, 2021

Closing Remarks

Mahalo for the opportunity to comment. OHA looks forward to a revised DEA that takes into account our concerns regarding HRS 6E review and cultural resources. Should you have any questions, please contact OHA's Lead Compliance Specialist, Kamakana C. Ferreira at (808) 594-0227 or by email at kamakanaf@oha.org.

'O wau iho nō me ka 'oia 'i'o,

Sylvia M. Hussey, Ed.D.
Ka Pouhana, Chief Executive Officer

SH:kf

CC: Herman Tuiolosega, Head Planner, HDOT
Scott Freeman, Freeman Holdings of Hawaii, LLC.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Sylvia M. Hussey, Ed.D.
Ka Pouhana, Chief Executive Officer
State of Hawaii
Office of Hawaiian Affairs
560 North Nimitz Highway, Suite 200
Honolulu, Hawaii 96817

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 and 076

Dear Ms. Hussey:

Thank you for your comments dated March 5, 2021 (File No. HRD21-9486) regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *The archaeological resources section indicates that archaeological work was done as part of the United States (U.S.) Navy's 1999 final environmental impact statement (FEIS) for the disposal and reuse of the former Naval Air Station Barbers Point. While this work identified 62 archaeological sites that are eligible for the National Register of Historic Places (NRHP), the DEA indicates that none of those sites are within the project area and that subsequently there will be no adverse impact to historic properties. There is no discussion on the archaeological techniques (i.e., pedestrian survey, subsurface testing) used to identify sites or any mention that the project will undergo HRS 6E review. This is basically the same information that was provided in the 2010 FEA. However, while the current DEA is silent on consultation with the State Historic Preservation Division (SHPD), the FEA did mention that the SHPD commented on the project in 2010 and concurred with a determination of no effect to historic properties.*

As it has been over 20 years since archaeological work has taken place within the project area and 10 years since the SHPD last commented, SHPD could recommend an updated study or field inspection. Occasionally, projects with extreme delays may be required to undergo the historic preservation review process again, to ensure that the newest information and technology are applied to the detection, assessment, and mitigation of potential impacts to invaluable and irreplaceable historic and cultural sites and resources, as well as to iwi kūpuna which have been proven to exist in the extensive sinkholes and karst features of Kalaeloa despite extensive surface alteration and disturbance in the past. Furthermore, OHA was reassured that the project would undergo HRS 6E review; thus, we believe it is premature and misleading for the DEA to state that there is no adverse impact to historic properties. OHA recommends that the DEA make specific mention of the need to conduct HRS 6E review in the discussion on archaeological resources and that an adverse effect determination is still pending.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 1: We appreciate your thoughtful review of the Draft EA and acknowledge your comments. We would like to note that "Chapter 6E" review was included in the list of permits, approvals, and reviews that may be required prior to construction and operation of the proposed project as outlined in Section 4.3 (Required Permits and Approvals) of the Draft EA. In response to your comment, Section 3.6 (Historic, Archaeological and Cultural Resources) of the Final EA has been updated to state:

> *The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If required, any studies or field inspections would be initiated, and the resulting report would be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.*

With regard to the previously conducted studies, we note that the archaeological and architectural inventory surveys of Naval Air Station (NAS) Barbers Point prepared in conjunction with the preparation of the U.S. Navy's 1999 Final EIS were provided to SHPD for review. In a letter from the State Historic Preservation Officer (SHPO) (no date; Log No.: 22424), SHPD concurred with the U.S. Navy's determination that implementation of the Historic Preservation Covenant, as written will result in "no adverse effect" to the significant historic sites known to be present in the parcels subject to conveyance.

Although we do not have copies of these previous archaeological and architectural inventory surveys from which we can provide you with information on the archaeological techniques used to identify archaeological sites, submittal of these reports to SHPD and their eventual acceptance indicates that the techniques used for the identification of historic properties were deemed adequate. As mentioned in your comment, SHPD could recommend an updated study or field inspection be conducted for the currently proposed action. However, the need for such a study will be determined independently through the Chapter 6E historic preservation review process and in consultation with SHPD.

With regard to your other comments, we respectfully disagree with your comment that it is premature and misleading for the Draft EA to state that there is no adverse impact to historic properties. As part of the U.S. Navy's 1999 Final EIS, extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

We note that the current project site was included in the scope of the surveyed area, which at the time was already in use as an airport. Based on the findings of those previous studies, no archaeological sites were located at the project site or within Kalaeloa Airport. Of the twelve historic structures identified as eligible for listing on the National Register of Historic Places (NRHP), only three of these structures, the Air Traffic Control Tower, Hangars 110 and 111 were located within Kalaeloa Airport. These structures are not located in the immediate vicinity of the project site, and the proposed action will not involve any improvements to these structures. Based on the foregoing information, it is reasonable to believe that the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity.

Furthermore, as mentioned in your comment, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project. Since the project site assessed in the 2010 Final EA includes the proposed Fixed Base Operation (FBO) site, there is reason to believe that a similar determination will be made for proposed FBO project.

Comment 2: *There is a section in the DEA labeled as "cultural resources", yet no methodology is provided on how cultural resources were identified and how cultural impacts were assessed. The section appears to rely on historical military use of the area and the fact that the area is an airport to dismiss the possibility of cultural practices occurring within or around the project area. As part of the 2010 FEA comment process, OHA did question the methodology used for the cultural impact assessment (CIA) and requested to review the actual document. In reply, again, the use of the area as an airport was used to justify that access to the project area for cultural purposes would be restricted. No CIA or cultural analysis was provided to OHA for review.*

Guidelines for assessing cultural impacts are provided by the Office of Environmental Quality Control (OEQC) in the Guide to Implementation and Practice of the Hawaii Environmental Policy Act, Exhibit 1-1, 2012 Edition. Of relevance to this project, these guidelines calls for an analysis of cultural practices and resources located within "the broad geographical area in which the proposed project is located, as well as their direct or indirect significance or connection to the project site." Furthermore, the process should involve an attempt to consult with community folks and cultural practitioners to ascertain ethnographic information on cultural resources and practices. As the DEA does not consider cultural impacts to the broader area beyond the project site and fails to mention any type of outreach specific to cultural related consultation, we encourage the applicant to complete a cultural analysis or cultural impact assessment (CIA) that is compliant with these guidelines and minimally reach out to the Kalaeloa Legacy and Heritage Foundation.

OHA would further like to remind the applicant that the lack of any formal methodology or explanation specifically targeted at traditional and customary practices could prevent the approving agency, HDOT, from assessing the identity and scope of valued cultural and natural resources in the area. Articles IX and XII of the State of Hawai'i Constitution requires that government agencies must "promote and preserve cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups." Article XII Section 7 of the State of Hawai'i Constitution states:

> "the State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua'a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778…"

In Ka Pa'akai O Ka 'Aina v. Land Use Commission, 94 Haw. 31 (2000), hereinafter Ka Pa'akai, the Hawai'i Supreme Court, reiterated the importance of Section 7 and reaffirmed that the State and its agencies are obligated to reasonably protect the traditional and customary rights of Hawaiians. The Supreme Court ruling States that agencies are obligated to make the assessment of cultural practices, independent of a developer or applicant. Typically, information gathered during a CIA or cultural impact study during HRS 343 can help to inform the approving agency during the Ka Pa'akai process. However, there is no apparent methodology for how cultural impacts were assessed within the DEA.

The Ka Pa'akai court decision set forth that a proper analysis of cultural impacts shall include: 1) the identity and scope of valued cultural, historical, or natural resources in the subject area, including the extent to which traditional and customary native Hawaiian rights are exercised; 2) the extent to which those resources – including traditional and customary native Hawaiian rights – will be affected or impaired by the proposed action; and, 3) the feasible action, if any, to be taken by the (agency) to reasonably protect native Hawaiian rights if they are found to exist. Generally, the "subject area" is not restricted to the project area as areas adjacent to the project area could be indirectly or directly impacted by actions within the project area. OHA recommends that the applicant work with the approving agency, HDOT, to carefully evaluate the Ka Pa'akai requirements and the OEQC guidelines for CIAs.

Response 2: We acknowledge your comments regarding the assessment of cultural impacts in the Draft EA and regarding cultural assessments in general. Pursuant to HAR §11-200.1-13(b)(4), an action shall be determined to have a significant effect on the environment if it may have a substantial adverse effect on the cultural practices of the community and State.

According to the 1902 Hawaii Territory Survey map of Oahu by John M. Donn and Walter E. Wall, the project site and the surrounding airport area was previously used as grazing lands, which is presumed to be associated with ranching activities. An area of land northeast of the project site was identified as being used for sisal (agave) plantations while the majority of land located north of the project site was used for sugar plantations. In the 1930's, the Kalaeloa area was under intensive military use as part of the NAS Barbers Point. During this period of use by the U.S. Navy, the proposed FBO site was developed as a concrete aircraft parking apron and the proposed Fuel Farm site supported ancillary activities. These uses continued until Kalaeloa Airport was transferred to HDOT-A.

The project site has been altered by historic and modern land use including grading and grubbing of perhaps 85 percent of the site. Based on information provided in the 2010 Final EA, ethnographic accounts and past archaeological investigations in the vicinity revealed that prior to extensive historic and modern land alteration, the project site would have possibly yielded the remnants of traditional Hawaiian temporary habitations used during forays for marine resources. Evidence of opportunistic seasonal agriculture and possibly burials would also have been likely. With the spread of Western land use in the 19th century, the project area may have been used for ranching as evidenced by the survey map showing the land as being used for grazing before the intensive military use.

The project site has been used for aviation and aircraft-related uses for 90 years or more. During this period, public access to the project site was controlled by the U.S. Navy. Further, all uses and activities were restricted to military purposes. Current use of the project site is limited by HDOT-A as authorized by HRS, Chapter 262-4(a) and permitted by HAR, Chapter 19-17.1, Small Plane Hangar Units and Tie-Down Spaces at Public Airports. Access to the project site is controlled by the HDOT-A and by assurances made by HDOT-A on behalf of the State of Hawaii to the U.S. Department of Transportation, Federal Aviation Administration (FAA). HDOT-A and FAA policies limit the project site to aviation activities. While we acknowledge there is a possibility that cultural practices may have existed historically at the site, it is highly unlikely that these activities would have continued given the history of the land use over the past century, and the overall secure nature of the site. As such, the exercise of native Hawaiian rights, or any ethnic group, related to gathering, access or other customary activities will not be affected by the construction of the proposed action.

Pursuant to HAR §11-200.1-13(b)(1), an action shall be determined to have a significant effect on the environment if it may irrevocably commit a cultural or historic resource. For the same reasons stated previously, it is highly unlikely that any cultural resources exist at the project site or within the immediate vicinity. Moreover, the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity. The Applicant will continue to coordinate with HDOT-A regarding any additional consultation that may be required prior to implementation of the proposed action.
Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

RICK BLANGIARDI
MAYOR

ALEX KOZLOV, P.E.
DIRECTOR

HAKU MILLES, P.E.
DEPUTY DIRECTOR

March 8, 2021

SENT VIA EMAIL

Wilson Okamoto Corporation
publiccomment@wilsonokamoto.com

Dear Mr. Cheng,

Subject: Notice of Availability of the Draft Environmental Assessment for
Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm
Facility Tax Map Keys (TMKs): (1) 9-1-013:032 and 076
Kalaeloa, Oahu, Hawaii

Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments to offer at this time.

Should you have any further questions, please contact me at 768-8480.

Sincerely,

for Alex Kozlov, P.E.
Director

AK:cf (842325)

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Alex Kozlov, P.E., Director
City and County of Honolulu
Department of Design and Construction
650 South King Street, 11th Floor
Honolulu, Hawaii 96813

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Kozlov:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge that the City and County of Honolulu Department of Design and Construction (DDC) has no comments to offer at this time. A record of your comments has been appended to the Final EA in Appendix B.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 Ulu`ohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

RICK BLANGIARDI
MAYOR

ROGER BABCOCK, JR., Ph.D., P.E.
DIRECTOR AND CHIEF ENGINEER

TYLER K. SUGIHARA
ACTING DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 21-81

February 23, 2021

Wilson Okamoto Corporation
Mr. Keola Cheng
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
FEB 24 2021
WILSON OKAMOTO CORPORATION

Dear Mr. Cheng:

Subject: Notice of Availability
Draft Environmental Assessment for Million Air
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
TMK's: (1) 9-1-013:032 and 076

Thank you for the opportunity to review and comment on the subject project.

Our comments are as follows:

- During construction and upon completion of project; any damages/deficiencies along the sidewalk and/or roadways on Midway Road, and Lexington Street shall be repaired to City Standards and accepted by the City and at no cost to the City and County of Honolulu.

If you have any questions, please call Mr. Kyle Oyasato of the Division of Road Maintenance at 768-3697.

Sincerely,

Roger Babcock, Jr., Ph. D., P.E.
Director and Chief Engineer

cc: Wilson Okamoto Corporation - Ms. Rebecca Candilasa

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Roger Babcock, Jr., Ph. D., P.E.
Director and Chief Engineer
City and County of Honolulu
Department of Facility Maintenance
1000 Uluohia Street, Suite 215
Kapolei, Hawaii 96707

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 and 076

Dear Mr. Babcock:

Thank you for your comments dated February 23, 2021 (File No. DRM21-81) regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *During construction and upon completion of the project; any damages/deficiencies along the sidewalk and/or roadways on Midway Road, and Lexington Street shall be repaired to City Standards and accepted by the City and at no cost to the City and County of Honolulu.*

Response 1: There are currently no plans to improve Midway Street or Lexington Street as part of the proposed action. Proposed roadway improvements are limited to providing driveway access from the Kalaeloa Airport to Midway Street. Additionally, it should be noted that the project site is within the existing Kalaeloa Airport (JRF) under the jurisdiction of the State of Hawaii, Department of Transportation, Airports Division (HDOT-A), and is within the greater Kalaeloa Community Development District (KCDD) under the jurisdiction of the State's Hawaii Community Development Authority (HCDA). Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine whether any roadway improvements may be required. Section 3.10 (Traffic) of the Final EA has been updated with this information.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

RICK BLANGIARDI
MAYOR

DEAN UCHIDA
DIRECTOR

DAWN TAKEUCHI APUNA
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

March 5, 2021 2021/ELOG-344(GT)

Mr. Keola Chang
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
MAR 10 2021
WILSON OKAMOTO CORPORATION

Dear Mr. Chang:

SUBJECT: Comments
Draft Environmental Assessment (EA)
Million Air - Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Midway Street - Kalaeloa
Tax Map Keys 9-1-013: 032 and 076 (165404 POID)

This is in response to your letter (received February 22, 2021), requesting comments on the Draft EA for the proposed Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility (Project) at the Kalaeloa Airport (former Barbers Point Naval Air Station site). The Department of Planning and Permitting (DPP) has reviewed the information provided and offer the following comments:

Site Development Division:

1. The Project shall comply with the prevailing soil erosion and storm water quality standards ("Rules Relating to Water Quality").

2. Further, if the development proposes Land Disturbing Activities (as defined in the Rules Relating to Water Quality) of one acre or more, excluding contractor staging areas and baseyards, then the Final EA should include a narrative describing the Project's post-construction storm water quality strategic plan to comply with the "Rules Relating to Water Quality" ("Rules"). The narrative should include a written description of the proposed development, expected activities and pollutants that will be generated by activities at the site, and Low Impact Development site design strategies that will be used to comply with the Rules and include a development schedule.

3. The Project's compliance with the Rules Relating to Water Quality will be verified at the time that the plans are submitted to DPP for review.

4. The Applicant will need to submit a Site Development Division Master Application Form for Sewer Connection for any connections to the municipal sewer system.

Planning Division: Previous comments were addressed at a basic level in the Draft EA.

Land Use Permit Division: The site was zoned F-1 Military and Federal District and transferred to the State of Hawaii, Hawaii Community Development Authority (HCDA). The HCDA has zoning and land use jurisdiction over this Project.

Should you have any questions, please contact Gerald Toyomura, of our Urban Design Branch, at 768-8056.

Very truly yours,

for Dean Uchida
Director

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Dean Uchida, Director
City and County of Honolulu
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Uchida:

Thank you for your comments dated March 5, 2021 (File No. 2021/ELOG-344[GT]) regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Site Development Division:

Comment 1: *The Project shall comply with the prevailing soil erosion and storm water quality standards ("Rules Related to Water Quality").*

Response 1: We acknowledge your comment and Sections 3.2.1 (Geology and Topography and Soils), 3.3.1 (Surface Waters, Coastal Waters, and Groundwater) and 3.14.3 (Drainage System) have been updated to note that the proposed action may need to comply with the prevailing soil erosion and storm water quality standards ("Rules Related to Water Quality").

It should be noted that the project site is within the existing Kalaeloa Airport (JRF) under the jurisdiction of the State of Hawaii, Department of Transportation, Airports Division (HDOT-A), and is within the greater Kalaeloa Community Development District (KCDD) under the jurisdiction of the State's Hawaii Community Development Authority (HCDA). Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine any soil erosion and water quality standards that may be applicable to the subject project.

Comment 2: *Further, if the development proposes Land Disturbing Activities (as defined in the Rules Relating to Water Quality) of one acre or more, excluding contractor staging areas and baseyards, then the Final EA should include a narrative describing the Project's post-construction storm water quality strategic plan to comply with the "Rules Related to Water Quality" ("Rules"). The narrative should include a written description of the proposed development, expected activities and pollutants that will be generated by the activities at the site, and Low Impact Development site design strategies that will be used to comply with the Rules and include a development schedule.*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 2: The project site is comprised of two (2) adjacent lots that encompass a total area of approximately 263,589 square feet (SF), or 6.05 acres, on the grounds of JRF. We acknowledge your comment that land disturbing activities of one acre or more, may require a post-construction storm water quality strategic plan to comply with the City's "Rules Related to Water Quality". Post-construction storm water quality strategic plans are typically developed during the design phase as the actual development program and site layout are finalized. With the foregoing still under consideration, Section 3.14.3 (Drainage System) of the Final EA has been updated to state the following:

> *If required, under the City's Rules Related to Water Quality, projects that disturb more than one (1) acre of land are classified as Priority A projects.*
>
> *Priority A projects are required (unless determined to be infeasible) to:*
>
> - *Incorporate appropriate Low Impact Development (LID) site design strategies to the "maximum extent practicable" (MEP).*
> - *Incorporate appropriate Source Control BMPs to the MEP.*
> - *Retain on-site by infiltration, evapotranspiration, or harvest/reuse as much of the water quality volume (WQV) as feasible with appropriate LID Retention Post-Construction Treatment Control BMPs.*
> - *Biofilter any portion of the WQV that is not retained on-site with appropriate LID Biofiltration Post-Construction Treatment Control BMPs.*
>
> *If it is determined to be infeasible to retain and/or biofilter the Water Quality Volume, the City rules require the project to:*
>
> - *Treat (by detention, filtration, settling, or vortex separation) and discharge with appropriate Alternative Compliance Post-Construction Treatment Control BMPs, any portion of the WQV that is not retained on-site or biofiltered.*
> - *Retain or biofilter at an offsite location, the volume of runoff from a non-tributary drainage area equivalent to the difference between the project's WQV and the amount retained on-site or biofiltered.*
>
> *Appropriate BMP measures include but are not limited to: infiltration basins and trenches, subsurface infiltration systems, dry wells, bioretention basins, permeable pavement, green roofs, vegetated bio-filters, enhanced swales, detention basins, sand filters, vegetated swales and buffer strips.*

It should be noted that the project site is within the existing JRF under the jurisdiction of the HDOT-A and is within the greater KCDD under the jurisdiction of the State's HCDA. Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine the water quality requirements that may be applicable to the subject project.

Comment 3: *The Project's compliance with the Rules Relating to Water Quality will be verified at the time that the plans are submitted to DPP for review.*

Response 3: We acknowledge your comment and have noted in Section 3.14.3 (Drainage System) that if required, the proposed action's compliance with the Rules Relating to Water Quality would be verified at the time that the plans are submitted to DPP for review.

Comment 4: *The Applicant will need to submit a Site Development Division Master Application Form for Sewer Connection for any connections to the municipal sewer system.*

Response 4: Section 3.14.2 (Wastewater System) of the EA notes that wastewater at the project site is collected by a system of gravity sewers and wastewater pumpstations managed by Hawaii Water Service before it is conveyed to the City's Honouliuli Wastewater Treatment Plant for treatment and disposal. As such, no new connections to the City's wastewater system are being proposed. We acknowledge your comment and have updated Section 3.14.2 (Wastewater System) in the Final EA to state that a Site Development Division Master Application Form for Sewer Connection may be required for the proposed discharge to the municipal sewer system. Additionally, this form has been added to the list of required permits and approvals in Section 4.3 (Required Permits and Approvals) of the Final EA.

It should be noted that the project site is within the existing JRF under the jurisdiction of the HDOT-A and is within the greater KCDD under the jurisdiction of the State's HCDA. Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine whether a sewer connection application may be required for the subject project.

Planning Division:

Comment 5: *Previous comments were addressed at a basic level in the Draft EA.*

Response 5: We acknowledge your comment that the Planning Division's previous comments were addressed at a basic level in the Draft EA.

Land Use Permit Division:

Comment 6: *The site was zoned F-1 Military and Federal District and transferred to the State of Hawaii, Hawaii Community Development Authority (HCDA). The HCDA has zoning and land use jurisdiction over this Project.*

Response 6: We acknowledge your comment and note that this condition has been stated in Chapter 4 (Relationship to Plans, Policies, and Controls) of the EA.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

RICK BLANGIARDI
MAYOR

LIONEL CAMARA JR.
ACTING FIRE CHIEF

SHELDON K. HAO
ACTING DEPUTY FIRE CHIEF

March 4, 2021

RECEIVED
MAR 08 2021
WILSON OKAMOTO CORPORATION

Mr. Keola Cheng
Director - Planning Department
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

Subject: Draft Environmental Assessment
Million Air - Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: 9-1-013: 032 and 076

In response to your letter dated February 8, 2021, regarding the abovementioned subject, the Honolulu Fire Department (HFD) reviewed the submitted information and requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet (46 meters) from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)

   A fire department access road shall extend to within 50 feet (15 meters) of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; 2012 Edition, Section 18.2.3.2.1.)

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet (45,720 millimeters) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the Authority Having Jurisdiction. (NFPA 1; 2012 Edition, Section 18.3.1, as amended.)

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)

4. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Battalion Chief Reid Yoshida of our Fire Prevention Bureau at 723-7151 or ryoshida@honolulu.gov.

Sincerely,

JASON SAMALA
Assistant Chief

JS/TC:bh

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Jason Samala, Assistant Chief
City and County of Honolulu
Honolulu Fire Department
636 South Street
Honolulu, Hawaii 96813-5007

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Samala:

Thank you for your letter dated February 22, 2021 acknowledge receipt of our correspondence, as well as your comments dated March 4, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Fire department access roads shall be provided such that any portion of the facility or any portion of the exterior wall of the first story of the building is located not more than 150 feet (46 meters) from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)*

A fire department access road shall extend to within 50 feet (15 meters) of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; 2012 Edition, Section 18.2.3.2.1.)

Response 1: We acknowledge your comment and note that the project will be designed to comply with fire protection design standards. Section 2.1 (Project Description) of the EA states:

> *Both the FBO and Fuel Farm facility will provide access for emergency vehicles. Civil design drawings will be submitted to the City and County of Honolulu Fire Department (HFD) for review and approval as development proceeds.*

Comment 2: *A water supply approved by the county, capable of supplying the required fire flow for the fire protection shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet (45,720 millimeters) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the Authority Having Jurisdiction. (NFPA 1; 2012 Edition, Section 18.3.1, as amended.)*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 2: We acknowledge your comment and note that the project will be designed to comply with fire protection design standards.

Comment 3: *The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)*

Response 3: We acknowledge your comment and note that the project will be designed to comply with fire protection design standards.

Comment 4: *Submit civil drawings to the HFD for review and approval.*

Response 4: We acknowledge your comment that civil drawings are required to be submitted to HFD for review and approval. We additionally note that "Plan Review" has been included in the list of Required Permits and Approvals in Section 4.3 of the EA.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

POLICE DEPARTMENT

CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulupd.org

RICK BLANGIARDI
MAYOR

SUSAN BALLARD
CHIEF

JOHN D. McCARTHY
AARON TAKASAKI-YOUNG
DEPUTY CHIEFS

OUR REFERENCE EO-DK

March 3, 2021

SENT VIA EMAIL

Mr. Keola Cheng
publiccomment@wilsonokamoto.com

Dear Mr. Cheng:

This is in response to your letter of February 8, 2021, requesting comments on the Draft Environmental Assessment (EA) for the Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility project located in Kapolei.

The Honolulu Police Department has reviewed the online Draft EA and does not have any comments or concerns at this time.

If there are any questions, please call Major Gail Beckley of District 8 (Kapolei, Waianae) at 723-8400.

Sincerely,

DARREN CHUN
Assistant Chief of Police
Support Services Bureau

Serving and Protecting With Aloha

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Darren Chun, Assistant Chief of Police
City and County of Honolulu
Police Department
801 South Beretania Street
Honolulu, Hawaii 96813

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Chun:

Thank you for your comments dated March 3, 2021 (Reference No. EO-DK) regarding the subject Draft Environmental Assessment (EA). We acknowledge that the Honolulu Police Department has reviewed the online copy of the Draft EA and does not have any comments or concerns at this time. A record of your comments has been appended to the Final EA in Appendix B.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

RICK BLANGIARDI, MAYOR

BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
RAY C. SOON
MAX J. SWORD
NA'ALEHU ANTHONY

JADE T. BUTAY, Ex-Officio
ROGER BABCOCK, Jr., Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

March 8, 2021

RECEIVED
MAR 15 2021
WILSON OKAMOTO CORPORATION

Mr. Keola Cheng
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

Subject: Your Letter Dated February 8, 2021 Requesting Comments on the Draft Environmental Assessment for Million Air – Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility – Tax Map Key: 9-1-013: 032 & 076

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

The Honolulu Board of Water Supply does not have any water facilities within the project area. All water services should be provided by the private water system serving the area.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Ernest Y. W. Lau, P.E.
City and County of Honolulu
Board of Water Supply
630 South Beretania Street
Honolulu, Hawaii 96843

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Lau:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *The Honolulu Board of Water Supply does not have any water facilities within the project area. All water services should be provided by the private water system serving the area.*

Response 1: We acknowledge your comment and note that Section 3.14.1 (Water System) of the EA states that water service to the project will be provided by the Hawai'i Water Service and conveyed through the existing infrastructure on site.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

HAWAI'I GAS
THE CLEAN ENERGY COMPANY

March 5, 2021

Mr. Keola Cheng
Director - Planning
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

Subject: Notice of Availability of the Draft Environmental Assessment for
Million Air - Kalaeloa Airport Fixed Base Operations and Fuel Farm Facility
Tax Map Keys (TMKs): (1) 9-1-013:032 and 076
Plan Review and Comment

In response to your letter dated February 8, 2021, it has been determined that the area is currently clear of utility gas facilities.

Thank you for the opportunity to comment on the Draft Environmental Assessment for Million Air - Kalaeloa Airport Fixed Base Operations and Fuel Farm Facility. Should there be any questions, or if additional information is desired, please call Kristen Asato 596-1425.

Sincerely,

Hawaii Gas

Keith K. Yamamoto
Manager, Engineering

KKY:krs

WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Keith K. Yamamoto, Engineering Manager
Hawaii Gas
515 Kamakee Street
Honolulu, Hawaii 96814

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Yamamoto:

Thank you for your comments dated March 5, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge that Hawaii Gas has determined that the project site is currently clear of utility gas facilities. We also note that our records have been updated to identify you as the appropriate point of contact regarding environmental review documentation. A record of your comments has been appended to the Final EA in Appendix B.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Alicia Campbell <aliciacampbell814@gmail.com>
Sent: Saturday, March 6, 2021 11:55 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: Million dollar Questions

Aloha -- No fair the mainland company can shmooze da politicians and get away without doing due diligence. Do the right thing and get the EIS done da right way.

Hope get some good pple left in da government dat can stop dis phony biz.

Does did mainland company cair about the local people? How can they possibly say that it has no impact on Hawaii? The west side has many treasures dat need to be protected. Is the plan to bring in da mainland folks and kick out da local guy? What is the long term impact of breathing toxic fumes for my children? I am a concerned parent that doesnt understand why mainland business is more important than our keiki???

Please fix this. Aole Million Air!

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Alicia Campbell
Email: aliciacampbell814@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Campbell:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *No fair the mainland company can shmooze da politicians and get away without doing due diligence. Do the right thing and get the EIS done da right way.*

Hope get some good pple left in da government dat can stop dis phony biz.

Response 1: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *Does did mainland company cair about the local people? Is the plan to bring in da mainland folks and kick out da local guy?*

Response 2: The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action. As discussed in Section 3.12 (Socio-Economic Characteristics) of the Draft EA, the proposed action will provide many benefits for the community:

> *In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

> *In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.*
>
> *Combined with other past, present, and reasonably foreseeable future actions the proposed action would support the local economy and anticipated increased area population.*

This section has been updated in the Final EA to state that the Applicant intends to hire all employees locally with one possible exception. That is if a qualified, experienced General Manager cannot be hired, then the Applicant will go beyond Oahu, beginning with the other Hawaiian Islands before resorting to the mainland for recruiting.

Comment 3: *How can they possibly say that it has no impact on Hawaii?*

Response 3: There is always a slight environmental concern with all projects as it is difficult to prevent all impacts. However, measures have been incorporated into the design to mitigate environmental risk to the maximum extent practicable. As discussed in the response to Comment #1, as the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules. Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for the determination of no significant impact.

Comment 4: *The west side has many treasures dat need to be protected.*

Response 4: The project site is located within an existing airport within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. There are no natural, cultural, or historic resources of significant identified within or in the immediate vicinity of the proposed project site.

Comment 5: *What is the long term impact of breathing toxic fumes for my children? I am a concerned parent that doesnt understand why mainland business is more important than our keiki???*

Response 5: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: amelia anderson <amelianaderson100@gmail.com>
Sent: Saturday, March 6, 2021 12:04 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: What's Going On?

1. Why are they building such a big structure on the airport?

2. Why would Million Air spend $12 million to build something in the middle of nowhere?

3. What kind of planes are going to be coming to the airport? What kind of noise levels will that bring?

4. Why hasn't the community around the airport been contacted for concerns or questions?

5. What are the environmental impacts on Kaleloa Heritage Park?

6. What are the effects of toxic chemicals on our historical property?

7. Why does a mainland company get to decide not to work with the community surrounding their build?

8. What will happen to the cat community surrounding the airport?

9. What is the impact of increased air traffic to climate change?

10. What is the long-term plan for the airport? Is there a plan to have commercial companies like United, Delta, etc come to JRF to serve the west side communities?

I just found out about this and I'm worried about all of this happening in my community. Please answer my questions.

Thank you,
Amelia

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Amelia Anderson
Email: amelianaderson100@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Anderson:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Why are they building such a big structure on the airport?*

Response 1: The proposed action involves construction of a Fixed Base Operation (FBO). The size of the facility is based on market demands identified through previous experience with constructing FBO at other airport facilities and is also based on Million Air's standards to construct quality facilities that are spacious and well furnished. The FBO will have facilities to allow customers flying in from long distances a place to relax inside, rather than leaving them outside in the elements, while waiting for transportation to their destination. Additionally, pilots will have rest and flight preparation facilities while waiting for their clients. Attached to the FBO is an aircraft hangar of approximately 28,000 square feet designed and sized to accommodate long range corporate and private aircraft that the Applicant hopes to attract to Kalaeloa.

Comment 2: *Why would Million Air spend $12 million to build something in the middle of nowhere?*

Response 2: The proposed action is consistent with the long-range plans for the region. According to HCDA's 2006 Kalaeloa Airport Master Plan, Kalaeloa Airport (JRF) is envisioned as a prime economic driver, creating jobs and providing services as population in the region continues to grow. Therefore, the proposed action will serve to facilitate, streamline, and improve the efficiency and commercial viability of GA, commercial, and military aircraft operations. The proposed action is also consistent with the HDOT-A plan. The Kalaeloa Airport Master Plan identified the need to provide space for lease lots which the HDOT-A can lease to individual lessees for aviation-related uses.

Comment 3: *What kind of planes are going to be coming to the airport? What kind of noise levels will that bring?*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 3: Military and general aviation aircraft and personnel are anticipated to use the proposed facilities. Types of planes will consist of military transport, support, and fighter aircraft. Additionally, small to medium general aviation aircraft are also anticipated to utilize the facilities. The aircraft will be no different from the types of aircraft that are currently being serviced at the airport.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity.

Comment 4: *Why hasn't the community around the airport been contacted for concerns or questions?*

Response 4: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 5: *What are the environmental impacts on Kaleloa Heritage Park?*

Response 5: The Kalaeloa Heritage Park site is described on the Kalaeloa Heritage and Legacy Foundation website as a relatively undisturbed, 77-acre parcel with over 177 recorded cultural sites that consist of a heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park. No impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action.

Comment 6: *What are the effects of toxic chemicals on our historical property?*

Response 6: There are no historical sites located within the project site and, as such, no impacts on these properties are anticipated. However, we would like to note that a rare 1942 pillbox from the neighboring Marine Corps Air Station (MCAS) Ewa Field is stored at the proposed Fuel Farm site. The HDOT-A and the Applicant will coordinate with the appropriate parties to ensure the safe relocation of the pillbox. Section 3.6 (Historic, Archaeological and Cultural Resources) has been updated with the foregoing information.

Comment 7: *Why does a mainland company get to decide not to work with the community surrounding their build?*

Response 7: Please refer to the response to Comment #4. Also, the Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action.

Comment 8: *What will happen to the cat community surrounding the airport?*

Response 8: As discussed in Section 3.5.1 (Flora and Fauna) of the EA, mammalian species that may appear at the project site include the small Indian Mongoose, rats and feral cats and dogs. None of these species is a listed or candidate threatened, or endangered species as set for the by the U.S. Fish and Wildlife Service (USFWS). Section 3.5.1 goes on to further state:

> *Construction activities may temporarily disrupt routine behavior of common faunal species in the immediate area of the project site, but will not result in permanent displacement, or adversely affect regional distribution of affected fauna. Once project activities are complete, faunal activity in the vicinity of the project site is expected to return to pre-existing conditions.*

Comment 9: *What is the impact of increased air traffic to climate change?*

Response 9: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

With regard to climate change, Section 3.1 (Climate & Climate Change) of the EA states:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 10: *What is the long-term plan for the airport? Is there a plan to have commercial companies like United, Delta, etc come to JRF to serve the west side communities?*

Response 10: The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system. Furthermore, the proposed action is being privately funded and

will be privately owned. It will not preclude HDOT-A from accepting inter-island flights or other commercial flights in the future.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: American Renaissance Academy <info@arahawaii.org>
Sent: Monday, March 8, 2021 4:11 PM
To: Public Comment; herman.tuiolosega@hawaii.gov
Subject: Request for completion of EIS
Attachments: Request for Completion of EIS.pdf

Aloha,

Please see attached letter from American Renaissance Academy's Administrative Board.

Mahalo,
American Renaissance Academy

To whom it may concern,

We, collectively the Administrative Board of American Renaissance Academy, seek to raise our concern regarding the construction of Million Air's aircraft fuel facilities at the Kalaeloa Airport. We have recently become aware that the construction of a new fueling facility is going to be installed near our campus. Should the company have not done so, we urge the completion of an EIS by Million Air to ensure that the construction and storage of such materials will not impact the health and safety of our Academy's Ohana.

Should you require any additional information please feel free to reach out to us directly.

Mahalo,

ARA Administrative Board

_____

808-682-7337
91-1180 Midway Street
P.O. Box 75357
Kapolei, HI 96707

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

American Renaissance Academy Administrative Board
91-1180 Midway Street
P.O. Box 75357
Kapolei, Hawaii 96707
Email: info@arahawaii.org

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *We, collectively the Administrative Board of American Renaissance Academy, seek to raise our concern regarding the construction of Million Air's aircraft fuel facilities at the Kalaeloa Airport. We have recently become aware that the construction of a new fueling facility is going to be installed near our campus. Should the company have not done so, we urge the completion of an EIS by Million Air to ensure that the construction and storage of such materials will not impact the health and safety of our Academy's Ohana.*

Response 1: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination.

With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Amy Raymond <araymond@hawaiiflightschool.com>
Sent: Tuesday, March 9, 2021 10:35 PM
To: Public Comment
Subject: Questions About the Million Air Draft EA

To Whom it May Concern,

After hearing about and reading the draft EA for Million Air to build on Kalaeloa Airport, I have several concerns and questions. They are as follows:

1. Why was Barbers Point Flight School (BPFS) not included in the initial consultation that went out with the request for EA exemption on September 30th? Given that BPFS has a reasonable expectation that the construction and existence of these new building locations will impact its business we believe we should have been consulted. Why did HDOTA not require Million Air to consult with BPFS as a part of the current draft EA to which this question is in response to? Please explain how a FONSI finding can be concluded without consulting with existing businesses already active at the airport.
2. BPFS has existing properties in close proximity to the proposed building sites documented in the EA. The draft EA does not expressly detail how the proposed projects will deal with the existing risks of flight line flooding during heavy rains, nor the impact that increasing the amount of paved surfaces and additional infrastructure will have on increasing the risk of flooding during rain or other weather/natural events. How will Million Air address these issues with their projects and ensure and mitigate that their developments do not negatively impact other businesses, such as BPFS, that currently operate at the airport?
3. How will the increased traffic from having a second FBO/ground services operation at the airport be managed and mitigated by Million Air?
4. The self-serve pumps at Kalaeloa that BPFS instructors, their students, and rental customers use are located adjacent to the proposed Million Air Hangar and is sandwiched between it and the proposed Fuel Farm location. How will Million Air ensure that BPFS staff, students, and customers are able to safely refuel planes and are not impeded before, during or after construction?
5. How will Million Air mitigate the increased air traffic they are anticipating at Kalaeloa, particularly given that the Air Traffic Control Tower is utilized for training controllers and Kalaeloa is frequently used for training and teaching purposes? How will Million Air ensure that existing aviation businesses at the airport will not be negatively impacted by this increased traffic?
6. The draft EA states that it does not believe there will be a significant increase in air traffic at Kalaeloa, but there are quotes in local news properties discussing the significant increased air traffic that Million Air expects and intends to bring to the airport. Why does this discrepancy exist between public comments made by the firm and the assessment included in this EA? Which information is accurate?
7. The master plan that is discussed in the EA seems to have been developed prior to the existence of any of the current businesses at the airport. Why is such an out-of-date master plan being utilized and how has it impacted the assumptions made in this EA? Is there a more up to date master plan for Kalaeloa, and if not, why has HDOTA not developed one, and why is it not being used for this assessment?
8. The BPFS office currently experiences regular power outages and brown outs during routine and regular operations, particularly during rain. How will the new operations being proposed by Million Air impact power availability at Kalaeloa? What is Million Air doing to minimize and mitigate the disruption their power consumption will have on increasing overall power burden at the airport and on increasing the negative impact that increased risk of power outages and brown outs will have on the operation of other businesses at Kalaeloa, such as BPFS?

Mahalo for your time in reading my concerns and answering my questions about Million Air building infrastructures at Kalaeloa Airport. I look forward to hearing from you in this matter.

Respectfully,

Amy Raymond
Chief Flight Instructor, Barbers Point Flight School

O: 808-518-4661
araymond@hawaiiflightschool.com

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Amy Raymond
Chief Flight Instructor
Barbers Point Flight School
Email: araymond@hawaiiflightschool.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Raymond:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Why was Barbers Point Flight School (BPFS) not included in the initial consultation that went out with the request for EA exemption on September 30th? Given that BPFS has a reasonable expectation that the construction and existence of these new building locations will impact its business we believe we should have been consulted. Why did HDOTA not require Million Air to consult with BPFS as a part of the current draft EA to which this question is in response to? Please explain how a FONSI finding can be concluded without consulting with existing businesses already active at the airport.*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

It is noted that the Draft EA presents an anticipated finding of no significant impact. It is not until the the comments received during the public comment period of the Draft EA that the HDOT-A as the "Approving Agency" can consider and evaluate the sum of effects of the proposed action on the quality of the environment. Pursuant to this process, HDOT-A has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *BPFS has existing properties in close proximity to the proposed building sites documented in the EA. The draft EA does not expressly detail how the proposed projects will deal with the existing risks of flight line flooding during heavy rains, nor the impact that increasing the amount of paved surfaces and additional infrastructure will have on increasing the risk of flooding during rain or other weather/natural events. How will Million Air address these issues with their projects and ensure and mitigate that their developments do not negatively impact other businesses, such as BPFS, that currently operate at the airport?*

Response 2: The Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Comment 3: *How will the increased traffic from having a second FBO/ground services operation at the airport be managed and mitigated by Million Air?*

Response 3: Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 4: *The self-serve pumps at Kalaeloa that BPFS instructors, their students, and rental customers use are located adjacent to the proposed Million Air Hangar and is sandwiched between it and the proposed Fuel Farm location. How will Million Air ensure that BPFS staff, students, and customers are able to safely refuel planes and are not impeded before, during or after construction?*

Response 4: The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Comment 5: *How will Million Air mitigate the increased air traffic they are anticipating at Kalaeloa, particularly given that the Air Traffic Control Tower is utilized for training controllers and Kalaeloa is frequently used for training and teaching purposes? How will Million Air ensure that existing aviation businesses at the airport will not be negatively impacted by this increased traffic?*

Response 5: The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Any potential impacts to airport operations and air traffic control will be mitigated through coordination with HDOT-A.

Comment 6: *The draft EA states that it does not believe there will be a significant increase in air traffic at Kalaeloa, but there are quotes in local news properties discussing the significant increased air traffic that Million Air expects and intends to bring to the airport. Why does this discrepancy exist between public comments made by the firm and the assessment included in this EA? Which information is accurate?*

Response 6: As mentioned in the response to Comment #5, the project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

Comment 7: *The master plan that is discussed in the EA seems to have been developed prior to the existence of any of the current businesses at the airport. Why is such an out-of-date master plan being utilized and how has it impacted the assumptions made in this EA? Is there a more up to date master plan for Kalaeloa, and if not, why has HDOTA not developed one, and why is it not being used for this assessment?*

Response 7: The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system. Both the 2006 and 1998 master plans are the latest versions of the respective plan documents, although HDOT-A has been informed of your concerns regarding the date of the master plan.

Comment 8: *The BPFS office currently experiences regular power outages and brown outs during routine and regular operations, particularly during rain. How will the new operations being proposed by Million Air impact power availability at Kalaeloa? What is Million Air doing to minimize and mitigate the disruption their power consumption will have on increasing overall power burden at the airport and on increasing the negative impact that increased risk of power outages and brown outs will have on the operation of other businesses at Kalaeloa, such as BPFS?*

Response 8: In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Anuhea perry <anuheaperry22@gmail.com>
Sent: Monday, March 8, 2021 1:07 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Concerns in Kalaeloa

Aloha e,
If you could please review a few questions, It would be greatly appreciated.

- We already get a lot of flooding at Kalaeloa during the rainy season, which makes operations difficult or impossible for us. Won't adding additional buildings and paving over earth increase the severity of flooding at the airport? Why is this not discussed in your EA and how will Million Air address this?

- How will the increased traffic in the backroads of Kalaeloa impact the children attending Barbers Point Elementary School and American Renaissance Academy? How will it impact other individuals and organizations at the airport? Has Million Air taken measures to ensure the safety of the school children across the fuel farm in a broader context? Why is none of this addressed in the EA?

- The spike in sea temperatures and the rising of sea levels have been seen around the oceans of the world. Hawaii is surrounded by the largest of Earth's oceanic divisions with much risk to the impacts of what sea level rises do to the biosystems. Given that Kalaeloa is only 30 feet above sea level, what is the impact Million Air's project will have on rising sea levels, and likewise how is Million Air undertaking these projects to ensure they are not impacted by increases in sea level?

- The master plan that is discussed in the EA seems to have been developed prior to the existence of any of the current businesses at the airport. Why is such an out of date master plan being utilized and how has it impacted the assumptions made in this EA? Is there a more up to date master plan for Kalaeloa, and if not why has HDOTA not developed one, and why is it not being used for this assessment?

- How is Million Air going to ensure that construction isn't going to impact our operations? We utilize airport facilities that are close to the proposed sites, so how will Million Air make sure that we still have safe access during the construction process?

Mahalo!

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Anuhea Perry
Email: anuheaperry22@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Perry:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *We already get a lot of flooding at Kalaeloa during the rainy season, which makes operations difficult or impossible for us. Won't adding additional buildings and paving over earth increase the severity of flooding at the airport? Why is this not discussed in your EA and how will Million Air address this?*

Response 1: The proposed improvements will not increase flood risks or cause any adverse flood-related impacts at the project site or at lower elevation properties. The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 2: *How will the increased traffic in the backroads of Kalaeloa impact the children attending Barbers Point Elementary School and American Renaissance Academy? How will it impact other individuals and organizations at the airport? Has Million Air taken measures to ensure the safety of the school children across the fuel farm in a broader context? Why is none of this addressed in the EA?*

Response 2: Regarding traffic, no significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Regarding other individuals and organizations at the airport, the project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Regarding safety, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Comment 3: *The spike in sea temperatures and the rising of sea levels have been seen around the oceans of the world. Hawaii is surrounded by the largest of Earth's oceanic divisions with much risk to the impacts of what sea level rises do to the biosystems. Given that Kalaeloa is only 30 feet above sea level, what is the impact Million Air's project will have on rising sea levels, and likewise how is Million Air undertaking these projects to ensure they are not impacted by increases in sea level?*

Response 3: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are*

> *consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

Section 3.4.1 (Sea Level Rise) of the EA provides a project-related discussion on sea level rise. Specifically, Section 3.4.1 of the EA states:

> *The project site is not located within the 3.2-foot or 6-foot sea level rise exposure area (SLRXA) as depicted by the National Oceanic and Atmospheric Administration (NOAA) Sea Level Rise data (See Figure 3-4: Sea Level Rise Exposure Map). No short or long-term impacts on sea level rise are anticipated during construction or operation of the proposed project. The exact nature of how the sea level will rise and when is unknown. New information will continually be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to sea level rise.*

Comment 4: *The master plan that is discussed in the EA seems to have been developed prior to the existence of any of the current businesses at the airport. Why is such an out of date master plan being utilized and how has it impacted the assumptions made in this EA? Is there a more up to date master plan for Kalaeloa, and if not why has HDOTA not developed one, and why is it not being used for this assessment?*

Response 4: The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system. Both the 2006 and 1998 master plans are the latest versions of the respective plan documents. HDOT-A has been made aware of your concerns related to the age of the plans.

Comment 5: *How is Million Air going to ensure that construction isn't going to impact our operations? We utilize airport facilities that are close to the proposed sites, so how will Million Air make sure that we still have safe access during the construction process?*

Response 5: The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Bill van den Hurk <billv@alohakia.com>
Sent: Tuesday, March 9, 2021 9:22 PM
To: Public Comment

Aloha

I'm writing on behalf of Barbers Point Aviation and Reginald Perry. I find it so difficult to see how a local business cant progress. And mainland companies come in and the state puts aside its local born. The Islands need more local and passionate owner operators. They care about their community and Ohana outsiders don't. Why is Hawaii not willing to work with a leader that's established and in the community. Why can't we look to our own homegrown for the betterment of Hawaii. Barbers Point Aviation can do what the community needs.

Bill van den Hurk

Aloha Auto Group | *President* | **billv@alohakia.com**
I All Islands I Oahu I Maui I Big Island I Kauai I

Office: (808) 792-8900 | Fax: (808) 833-3444 | Mobile: (808) 864-6649
2841 N Nimitz Hwy. | Honolulu, HI 96819 | **www.alohakia.com**

Notice to recipient: This email is meant for only the intended recipient of the transmission, and may contain confidential material. If you received this email in error, please notify us immediately of the error by return email and delete this message and all copies of it from your system. Thank you in advance for your cooperation.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Bill van den Hurk
President
Aloha Auto Group, Ltd.
2841 N Nimitz Highway
Honolulu, Hawaii 96819
Email: billv@alohakia.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. van den Hurk:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I'm writing on behalf of Barbers Point Aviation and Reginald Perry. I find it so difficult to see how a local business cant progress. And mainland companies come in and the state puts aside its local born. The Islands need more local and passionate owner operators. They care about their community and Ohana outsiders don't. Why is Hawaii not willing to work with a leader that's established and in the community. Why can't we look to our own homegrown for the betterment of Hawaii. Barbers Point Aviation can do what the community needs.*

Response 1: As discussed in Chapter 2 of the EA, the proposed action involves construction of a Fixed Base Operation (FBO) and Fuel Farm Facility that will provide aviation services to the general aviation community consistent with the designated uses in the JRF Airport Layout Plan (ALP), which designates the project site for use as lease lots, intended to be leased to prospective fixed base and GA operators. Section 2.2 (Purpose and Need) of the EA states:

> *According to HCDA's 2006 Kalaeloa Master Plan, JRF is envisioned as a prime economic driver, creating jobs and providing services as population in the region continues to grow. Therefore, the overarching purpose and need of the proposed action is to develop the FBO and Fuel Farm Facility to serve existing and future GA operations along with both commercial and military aircraft operations at JRF. To be clear, the proposed action is not anticipated or intended to significantly impact the capacity of aircraft operations at JRF. Instead, it will serve to facilitate, streamline, and improve the efficiency and commercial viability of GA, commercial, and military aircraft operations.*

> *Pursuant to this, the JRF Master Plan identified the need to provide space for lease lots which the HDOT-A can lease to individual lessees for aviation-related uses. Use of lease lots is typically done at most of the State's airports. The terms and conditions of the lease can vary according to the lessee's intended use. Generally, one of the conditions of the lease is the lots must be used for aviation related purposes. The HDOT-A has also developed lease lots at Daniel K. Inouye International Airport (HNL) along Lagoon Drive. The proposed action is consistent with the HDOT-A plan. The development of the proposed action is not anticipated to significantly impact the volume of aircraft operations at JRF.*
>
> *Moreover, the proposed action is consistent with the U.S. Navy 1999 FEIS, State-preferred alternative, which was also the U.S. Navy's preferred alternative: Continued use of the existing runways and aviation related facilities.*

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Brad Hayes <bradhayes463@gmail.com>
Sent: Wednesday, March 10, 2021 8:55 AM
To: Public Comment
Subject: Barbers point /Kalaeoa airport.

To whom it may concern:

Million Air aviation is a non local business that has upset and caused the displacement and extinction of of actual historical preservation and physical artifacts and they have not even moved in yet.
A entire historical aircraft collection consisting of almost 60 years of the former Naval Air station's ACTUAL aircraft have been erased and destroyed. There were very FEW places in the entire world much less in this state you as a local resident could see artifacts from this specific airports history.
The museum as a org has been evicted off its airport for Million Air.
All of the senior staff and leadership absolutely lied to whoever they needed to enable it to happen so Million Air could get free reign of the airport. Including the Lt Gov Josh Green.
They made up false reasons for eviction of the museum that included Enviormental drips and stains , lack of insurance, and no lease. They engineered these claims to suit them in their case. When the DOTA was taken to court to stop this travesty of a few people's agenda against the museum effort and its collected artifacts of Kalaeoa airport history, they told the judge what needed to be said in order to win. They made zero effort in mediation to resolve and compromise for options. In fact they brought no options.

Once the physical inconvenience of the museum was fast tracked to complete removal, a host of other local people and tenants that had hangars or leases were then (and now) are being removed/not renewed.

The reason for all this history is to convey to you guys one point:

Senior leadership at DOT airports has never had local businesses or residents or native peoples interest at heart in the haphazard planning, concern, or protection of our states people at forefront.. much less historical preservation of precious local artifacts. Every person from Roy Sakata on up at DOTA is personally accountable for this.
Actual retribution is a common response and tactic by them if you complain or fight them. This is a real thing.

Letting Million Air set up a FBO at Kalaeoa will only:
-Destroy more local businesses.
-Open the door for part 139.
-Enable scheduled air passenger service daily with its regular jet noise.
-Drop property values on homes in the area near the airport and in Makakilo.
- It will ADD more vehicle traffic in Kapolei. Which , if you have ever driven in Kapolei at lunch or rush hour is a major hassle.
-MONEY LEAVES THE STATE OF HAWAII.

There is ONLY enough market for ONE FBO at Kalaeoa. Anything more is counter to positive impact here at Kalaeoa. Anything in favor of Million air is simply nothing more then spin and hyperbole to gain your approval. Nothing more.

The questions you must ask yourselves is simply this; At the end of the day, do you support local residents and thier culture, historical preservation, and a economic strength?, Its local businesses?

Finally It is my fervent hope you support local /owned businesses in place at Kalaeoa airport, and strongly consider my frank statements above in your decision going forward. Simply stating them has repercussions for me personally thru

retribution by DOTA, and I will be harassed and smeared or diminished. It is important enough to me however to be public about this.

Aloha, and Mahalo for your time reading my opposition to any further FBO additions on Kalaeoa.

Brad Hayes
Naval Air Museum Barbers Point.
(808) 673-6289

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Brad Hayes
Naval Air Museum Barbers Point
Email: bradhayes463@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Hayes:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Million Air aviation is a non local business that has upset and caused the displacement and extinction of of actual historical preservation and physical artifacts and they have not even moved in yet. A entire historical aircraft collection consisting of almost 60 years of the former Naval Air station's ACTUAL aircraft have been erased and destroyed. There were very FEW places in the entire world much less in this state you as a local resident could see artifacts from this specific airports history.*
The museum as a org has been evicted off its airport for Million Air.
All of the senior staff and leadership absolutely lied to whoever they needed to enable it to happen so Million Air could get free reign of the airport. Including the Lt Gov Josh Green.
They made up false reasons for eviction of the museum that included Enviormental drips and stains , lack of insurance, and no lease. They engineered these claims to suit them in their case. When the DOTA was taken to court to stop this travesty of a few people's agenda against the museum effort and its collected artifacts of Kalaeoa airport history, they told the judge what needed to be said in order to win. They made zero effort in mediation to resolve and compromise for options. In fact they brought no options.

Once the physical inconvenience of the museum was fast tracked to complete removal, a host of other local people and tenants that had hangars or leases were then (and now) are being removed/not renewed.

Response 1: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators. An EA for the development of the project vicinity into lease lots was completed in 2010. The FBO will take the place of one of those lease lots and will not physically take the place of the museum.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa

Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 2: *The reason for all this history is to convey to you guys one point:*

Senior leadership at DOT airports has never had local businesses or residents or native peoples interest at heart in the haphazard planning, concern, or protection of our states people at forefront.. much less historical preservation of precious local artifacts. Every person from Roy Sakata on up at DOTA is personally accountable for this. Actual retribution is a common response and tactic by them if you complain or fight them. This is a real thing.

Response 2: HDOT-A has been made aware of your concerns regarding leadership at the State airport facilities.

Comment 3: *Letting Million Air set up a FBO at Kalaeoa will only:*
-Destroy more local businesses.
-Open the door for part 139.
-Enable scheduled air passenger service daily with its regular jet noise.
-Drop property values on homes in the area near the airport and in Makakilo.
- It will ADD more vehicle traffic in Kapolei. Which, if you have ever driven in Kapolei at lunch or rush hour is a major hassle.
-MONEY LEAVES THE STATE OF HAWAII.

Response 3: As previously stated, JRF is envisioned as a prime economic driver, creating jobs and providing services pursuant to HCDA's 2006 Kalaeloa Master Plan. Therefore, the overarching purpose and need of the proposed action is to develop the FBO and Fuel Farm facility to serve existing and future GA operations along with both commercial and military aircraft operations at JRF. To be clear, the proposed action is not anticipated or intended to significantly impact the capacity of aircraft operations at JRF. Instead, it will serve to facilitate, streamline, and improve the efficiency and commercial viability of GA, commercial, and military aircraft operations.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

As discussed in Section 3.12 (Socio-Economic Characteristics) of the EA, the proposed action will provide many benefits for the community:

> *In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.*
>
> *In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.*
>
> *Combined with other past, present, and reasonably foreseeable future actions the proposed action will support the local economy and anticipated increased area population.*

Also, the Applicant intends to hire all employees locally with one possible exception. That is if a qualified, experienced General Manager cannot be hired, then the Applicant will go beyond Oahu, beginning with the other Hawaiian Islands before resorting to the mainland for recruiting.

Comment 4: *There is ONLY enough market for ONE FBO at Kalaeoa. Anything more is counter to positive impact here at Kalaeoa. Anything in favor of Million air is simply nothing more then spin and hyperbole to gain your approval. Nothing more.*
The questions you must ask yourselves is simply this; At the end of the day, do you support local residents and thier culture, historical preservation, and a economic strength?, Its local businesses?

Finally It is my fervent hope you support local /owned businesses in place at Kalaeoa airport, and strongly consider my frank statements above in your decision going forward. Simply stating them has repercussions for me personally thru retribution by DOTA, and I will be harassed and smeared or diminished. It is important enough to me however to be public about this.

Response 4: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to

augment and serve aviation operations and drive commerce in the region. From a fundamental standpoint, market forces will dictate the viability of FBO operations at JRF, as is the case for virtually any form of commercial enterprise.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Brian Walker <hideo.walker@gmail.com>
Sent: Wednesday, March 10, 2021 7:55 AM
To: herman.tuiolosega@hawaii.gov; Public Comment
Subject: Re: EIS Commnets...

To Whom It May Concern,

In response to an article by William Cole in the Honolulu Star-Advertiser, dated 2/16/2021, I find it suspicious that and I quote, " A mainland aircraft services partnership with deep pockets plans to spend $12 million for a luxury "fixed-base operation " and fuel farm at Kalaeloa Airport that is many times larger than the locally run operation that's there now."

So, how is it that Million Air is able to fly into Honolulu and propose to significantly increase the flight operations at Kalaeloa without providing an Environmental Impact Statement?

I'm all for providing the airline industry with increased services, along with more jobs for the local community, but not at the expense of that said community in the way of endangering them to foreseen and unforeseen health issues that only a proper EIS can determine.

How can the State of Hawaii, DOT-A issue a statement and I quote once again, "The state draft environmental assessment for the Million Air Honolulu plan carries with it an "anticipated finding of no significant impact."

No significant impact for a project that will include:

- FBO is "envisioned " as a metal-and-glass building that's 310 feet long, 140 feet wide and 50 feet tall.
- Conceptually, the business could have 30,000 square feet for a general aviation hangar and 8,000 square feet for a two-story office area with an executive airport terminal /lobby, conference room, pilot lounge, theater rooms and cafe and refreshment area.
- The proposed fuel farm is anticipated to include up to eight 30,000-gallon above-ground Jet-A fuel tanks, for a total of 240,000 gallons of jet fuel, and one 15,000-gallon aviation gas tank.
- Increased flight operation in and around culturally sensitive Hawaiian lands and wildlife, many of which are federally protected.

"The airport now has one 20,000-gallon Jet-A tank and a 10,000-gallon "Avgas " aviation fuel tank, according to the state." The proposed project is an increase of 8.5 times the current amount of fuel on site.

This sounds like the Hawaii Superferry all over again. In that situation, "Hawaii Supreme Court ruled that a state law allowing the Superferry to operate without a second complete environmental impact statement was unconstitutional."

As a concerned resident of Honolulu, Hawaii, I highly encourage that the parties involved in this project be held to the highest standards of providing a proper Environmental Impact Statement and not just an Environmental Assessment.

Mahalo,

Brian Walker

On Tue, Mar 9, 2021 at 4:29 PM melvin andres <melboyandres@yahoo.com> wrote:

Sent from my iPhone

Begin forwarded message:

> **From:** Regi Perry <rperry@bpaviation.com>
> **Date:** March 9, 2021 at 3:24:35 PM HST
> **To:** "Colby Jones (colbyjones28@gmail.com)" <colbyjones28@gmail.com>, "wyjones@hotmail.com" <wyjones@hotmail.com>, Bill - Kia <billvhawaii@reagan.com>, David Ramos <3dsheetmetal@clearwire.net>, melvin andres <melboyandres@yahoo.com>, "floyd@fcshawaii.com" <floyd@fcshawaii.com>, Michael Hruby <mike@fivestartrans.com>, Brad Hayes <bradhayes463@gmail.com>, Tim Cislo <tim@workshop322.com>
> **Subject: EIS Commnets...**
>
> ALL:
>
> Just following up to see if you're able to make comments regarding Million Air and the concerns for me as well as the public. Please send your comments to:
>
> publiccomment@wilsonokamoto.com
>
> herman.tuiolosega@hawaii.gov

Attached is some bullet points. I wish the State of Hawaii cared that locals are getting over run by big business who use local resources only to send the money back to the continental US. They don't. That said, they will get their environmental survey exemption if comments are not given at the above emails by tomorrow. Then, without doing a full environmental survey (EIS), like you or I would need to do because we lack hundreds of millions of dollars, they can begin to break ground.

My business is 96.7% military so it isn't competition that will happen out here, it is a takeover. There is only one government contract and only one entity will get it. It will be Million Air because they are tapped in tight with the Defense Logistics Agency. I will simply bleed out when they come in and lowball my bid just because they can. Meanwhile, I've done all the work for over a decade. Right is right. And this is not right.

If you all don't already know, they hired lobbyist Bruce Coppa, Abercrombie's previous Chief of Staff and we believe in conjunction with other high up DOT-A officials, they have fast tracked Million Air. I have been trying to build my hangar now for four years. Whatever you think pertains to your interest in the attached Word .doc please comment at the above email addresses. The Word document is just some bullet points but feel free to go freestyle if you like. Thank you all for your time. Please send by tomorrow. Regi and Michelle.

BTW, look at the attached photo and ask ourself does any of Million Air's top officials look as if they'd give two shits about Hawaii, the land, the locals or our culture?

Points of interest:

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Brian Walker
Email: hideo.walker@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Walker:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *In response to an article by William Cole in the Honolulu Star-Advertiser, dated 2/16/2021, I find it suspicious that and I quote, " A mainland aircraft services partnership with deep pockets plans to spend $12 million for a luxury "fixed-base operation " and fuel farm at Kalaeloa Airport that is many times larger than the locally run operation that's there now."*

So, how is it that Million Air is able to fly into Honolulu and propose to significantly increase the flight operations at Kalaeloa without providing an Environmental Impact Statement?

I'm all for providing the airline industry with increased services, along with more jobs for the local community, but not at the expense of that said community in the way of endangering them to foreseen and unforeseen health issues that only a proper EIS can determine.

Response 1: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *How can the State of Hawaii, DOT-A issue a statement and I quote once again, "The state draft environmental assessment for the Million Air Honolulu plan carries with it an "anticipated finding of no significant impact."*

No significant impact for a project that will include:

- *FBO is "envisioned " as a metal-and-glass building that's 310 feet long, 140 feet wide and 50 feet tall.*
- *Conceptually, the business could have 30,000 square feet for a general aviation hangar and 8,000 square feet for a two-story office area with an executive airport terminal /lobby, conference room, pilot lounge, theater rooms and cafe and refreshment area.*
- *The proposed fuel farm is anticipated to include up to eight 30,000-gallon aboveground Jet-A fuel tanks, for a total of 240,000 gallons of jet fuel, and one 15,000-gallon aviation gas tank.*
- *Increased flight operation in and around culturally sensitive Hawaiian lands and wildlife, many of which are federally protected.*

"The airport now has one 20,000-gallon Jet-A tank and a 10,000-gallon "Avgas" aviation fuel tank, according to the state." The proposed project is an increase of 8.5 times the current amount of fuel on site.

Response 2: There is always a slight environmental concern with all projects as it is difficult to prevent all impacts. However, measures have been incorporated into the design to mitigate environmental risk to the maximum extent practicable. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules. Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for the determination of no significant impact.

Comment 3: *This sounds like the Hawaii Superferry all over again. In that situation, "Hawaii Supreme Court ruled that a state law allowing the Superferry to operate without a second complete environmental impact statement was unconstitutional."*

As a concerned resident of Honolulu, Hawaii, I highly encourage that the parties involved in this project be held to the highest standards of providing a proper Environmental Impact Statement and not just an Environmental Assessment.

Response 3: As mentioned in the response to Comment #1, this EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Christine <chris2tine637@hotmail.com>
Sent: Wednesday, March 10, 2021 3:09 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Questions for Million Air draft EA

Dear Sir,

I am writing to you with my concerns regarding Million Air moving into our community. The following are concerns of what is weighing on my mind regarding what will happen to our community with added traffic, noise pollution and health concerns for our culture and families especially our children in our community.

> 1. Here in Hawaii, our community is very important to our culture. Why did Million Air exclude the community by not reaching out to the community and to get their input?
>
> 2. With the location of the schools and the existing traffic we have in this community, has Million Air thought about how increased traffic will affect the safety of all students in this community?
>
> 3. I moved to the westside to get away from all air traffic in Honolulu, how does Million Air plan to address the noise pollution especially during the evenings?
>
> 4. With the neighborhood so close to the airport, is there any long term impact on the community's health?
>
> 5. How does a fuel spill affect the community?

Sincerely,
Christine Casison

Sent from my iPhone

10613-01
April 16, 2021

Ms. Christine Casison
Email: chris2tine637@hotmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Casison:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Here in Hawaii, our community is very important to our culture. Why did Million Air exclude the community by not reaching out to the community and to get their input?*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 2: *With the location of the schools and the existing traffic we have in this community, has Million Air thought about how increased traffic will affect the safety of all students in this community?*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 2: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 3: *I moved to the westside to get away from all air traffic in Honolulu, how does Million Air plan to address the noise pollution especially during the evenings?*

Response 3: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 4: *With the neighborhood so close to the airport, is there any long term impact on the community's health?*

Response 4: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that will have a significant impact on the health of the community.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 5: *How does a fuel spill affect the community?*

Response 5: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Colby Jones <colbyjones28@gmail.com>
Sent: Wednesday, March 10, 2021 8:46 AM
To: Public Comment
Subject: Hawaii First

Gentlemen:

I have been involved in general aviation in one form or another in Hawaii for over 50 years. My two sons basically grew up on the South Ramp at HNL. They are now both senior pilots at Hawaiian Air, with at least one of their children is pursuing a flying career, and in training at Kalaeloa.

I currently own two aircraft hangered in two of the "T" hangers at Kalaeloa. When I first heard about Million Air being considered as the F.B.O. for Kalaeloa, I could'nt come up with a logical reason why the DOT would consider destroying the financial investment, hard work, and "local first" business consideration, when Barbers Point Aviation Services went so far out on the limb for the DOT and the general aviation community in generating, what they now provide for the aviation community of Hawaii.

One of my main concerns is the old saying, "If it ain't broke, don't fix it." Also, it seems that things are on somewhat of a fast track. Like where is the E.I.S.? Where do they get hanger permits, when I know of at least seven local requests were rejected? I know of no complaints regarding BPAS or there service to GA. If there are any, they didn't come from any local flyers. And why are we giving more, of what should be local profits, to mainland big business?

Sincerely,
Colby C. Jones

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Colby C. Jones
Email: colbyjones28@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Jones:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I have been involved in general aviation in one form or another in Hawaii for over 50 years. My two sons basically grew up on the South Ramp at HNL. They are now both senior pilots at Hawaiian Air, with at least one of their children is pursuing a flying career, and in training at Kalaeloa.*

I currently own two aircraft hangered in two of the "T" hangers at Kalaeloa. When I first heard about Million Air being considered as the F.B.O. for Kalaeloa, I could'nt come up with a logical reason why the DOT would consider destroying the financial investment, hard work, and "local first" business consideration, when Barbers Point Aviation Services went so far out on the limb for the DOT and the general aviation community in generating, what they now provide for the aviation community of Hawaii.

One of my main concerns is the old saying, "If it ain't broke, don't fix it." Also, it seems that things are on somewhat of a fast track. Like where is the E.I.S.?

Response 1: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators. The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

(HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *Where do they get hanger permits, when I know of at least seven local requests were rejected?*

Response 2: The Applicant has been coordinating with HDOT-A regarding the necessary permits and approvals for the proposed action. HDOT-A has been made aware of your concern regarding the number of hangar permits that have been rejected.

Comment 3: *I know of no complaints regarding BPAS or there service to GA. If there are any, they didn't come from any local flyers. And why are we giving more, of what should be local profits, to mainland big business?*

Response 3: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: colleen aiwohi <colleenhiga24@hotmail.com>
Sent: Thursday, March 11, 2021 7:52 AM
To: Public Comment
Subject: Aviation Fuel

Hi Mr. Okimoto,
I am writing to you due regarding the aviation fuel that Mr. Mean has posted on IG, please let me know any further information.

Who is the company or agency involved.
Where is the specific site and who owns that property. DHHL, Hunt. Navy etc.
When will this be happening Or any POC to contact.

I live right in Kapolei and work right down the road from this area in Kalaeloa. Its extremely concerning to hear this if its true. Appreciate more information and updates on this and if the news media was notified or our Dept of Health and other organizations to stop this.

Colleen
808-225-9082

Sent from Mail for Windows 10

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Colleen Aiwohi
Email: colleenhiga24@hotmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Aiwohi:

Thank you for your comments dated March 11, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I am writing to you due regarding the aviation fuel that Mr. Mean has posted on IG, please let me know any further information.*

Who is the company or agency involved.
Where is the specific site and who owns that property. DHHL, Hunt. Navy etc.
When will this be happening Or any POC to contact.

Response 1: The project "Applicant" is Freeman Holdings of Hawaii, LLC DBA Million Air Honolulu. The applicant proposes to construct a Fixed Base Operation (FBO) and Fuel Farm facility on adjacent sites at the existing Kalaeloa Airport (JRF). The project site is owned by the State of Hawaii and is under the control and management of the State of Hawaii, Department of Transportation, Airports Division (HDOT-A). HDOT-A is the "Approving Agency" for the proposed action. Point of contact information has been published with the Final EA.

Construction for the Fuel Farm facility is anticipated to commence following design and permitting sometime in Q2 2021, with the completion and turn-key operation targeted for Q3 2021. Construction of the FBO facility, by contrast, is anticipated to commence sometime in late 2021, following the conclusion of associated design and permitting.

Comment 2: *I live right in Kapolei and work right down the road from this area in Kalaeloa. Its extremely concerning to hear this if its true. Appreciate more information and updates on this and if the news media was notified or our Dept of Health and other organizations to stop this.*

Response 2: A copy of this letter will be provided to the project applicant who will be able to provide any updates on the proposed action following publication of the Final EA.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Also, we note that the State of Hawaii, Department of Health (DOH) and several other City, State, and Federal organizations were made aware of the project through a written notice of publication of the Draft EA in the February 8th edition of the OEQC's *The Environmental Notice*. We received several comments, including yours, which were considered in the preparation of the Final EA pursuant to content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Don Cridlebaugh <kb3vlo@gmail.com>
Sent: Tuesday, March 9, 2021 4:05 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Questions regarding Million Air and JRF operations.

Sir or Ma'am,

I have the following questions regarding Million Air and operations at JRF airport.

Thanks for your time,

-Donald Cridlebaugh

Growing up as a young aircraft mechanic I watched big money step in build up a town with hopes and dreams only to decide after spending millions of dollars on infrastructure that it wasn't worth it in the end. They made thousands of people dependent on them and then they left. After leaving they insisted that no one could setup another business like theirs (that the airport was already set up for) because they didn't want the competition. Overnight over 7000 local workers lost their jobs. I watched Taco Bell go out of business. You can tell how bad things are when Taco Bell goes under. How do you plan to convince the local community that you won't do a similar thing to our community? Already many people depend on this airport for jobs. Do you plan to come in uproot everyone who already rely on this location for their existence, you plan to bring people in to make this work only for them to discover that its not the paradise that was promised? How do you plan to return this facility back to the community? We already have families losing their businesses in Dillingham. What's your Exit strategy and how do you plan to heal the local wounds after you've thrown away tons of money building up the infrastructure so much that it can't be sustained by the local economy and decide to give up in Hawaii and refocus your business on the mainland? The islands have seen it time and time again.

- Some airport activities such as fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction may result in the discharge of pollutants to adjacent water bodies and consequently trigger aquatic life and human health. Due to the fact that the Kapolei community has open area and encourages outdoor activity, why did Million Air ignore the potential hazards on human life? What about the school directly across the street from the proposed fuel farm location and the elementary school less than ½ mile from it. Why were they not consulted at all during the EA process and why does the EA not address the risk factors associated with this, given that the proposed fuels to be housed at the site are known carcinogens, amongst a variety of other heath concerns. How and when will Million Air address this in a way that is public and accountable to the community?

- Hawaii is home to over 400 endangered species. Why does this draft EA not recognize or address any of them? Why is a full Environmental Impact Survey not being undertaken, particularly as part of the proposed project will involve destroying open green space to make way for the fuel farm's concrete pad.

- JRF is 30 feet above sea level. With the rapid exposure to sea level rise, JRF will be under water within the next few decades. How will Million Air mitigate sea level rise at JRF? What happens if there is a Tsunami? The devastation in Japan after the earthquake on the nuclear facility was insane. On a local level what happens to our community if we have every soaked in Jet fuel after houses and buildings are damaged.

- What is the impact of a fuel spill on our groundwater systems? What about the leaks at Red Hill facility is still causing problems and will be a problem for many more years. This is a real concern for our community. How will Million Air address these issues? JRF is already subject to flooding during heavy rains, how will their proposed projects impact the risk of flooding, and why has the EA not addressed this issue? Further to this, how will Million Air ensure that the chemicals and fuels they utilize in their business will not end up in our ground water, in the ocean, or the environment at large during such flooding events?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Don Cridlebaugh
Email: kb3vlo@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Cridlebaugh:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Growing up as a young aircraft mechanic I watched big money step in build up a town with hopes and dreams only to decide after spending millions of dollars on infrastructure that it wasn't worth it in the end. They made thousands of people dependent on them and then they left. After leaving they insisted that no one could setup another business like theirs (that the airport was already set up for) because they didn't want the competition. Overnight over 7000 local workers lost their jobs. I watched Taco Bell go out of business. You can tell how bad things are when Taco Bell goes under. How do you plan to convince the local community that you won't do a similar thing to our community? Already many people depend on this airport for jobs. Do you plan to come in uproot everyone who already rely on this location for their existence, you plan to bring people in to make this work only for them to discover that its not the paradise that was promised? How do you plan to return this facility back to the community? We already have families losing their businesses in Dillingham. What's your Exit strategy and how do you plan to heal the local wounds after you've thrown away tons of money building up the infrastructure so much that it can't be sustained by the local economy and decide to give up in Hawaii and refocus your business on the mainland? The islands have seen it time and time again.*

Response 1: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region. Nonetheless, from a fundamental standpoint, market forces will dictate the viability of the Fixed Base Operation (FBO) operations at JRF, as is the case for virtually any form of commercial enterprise. The Applicant will continue to coordinate with State of Hawaii, Department of Transportation, Airports Division (HDOT-A) and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action.

Comment 2: *Some airport activities such as fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction may result in the discharge of pollutants to adjacent water bodies and consequently trigger aquatic life and human health. Due to the fact that the Kapolei community has open*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

area and encourages outdoor activity, why did Million Air ignore the potential hazards on human life? What about the school directly across the street from the proposed fuel farm location and the elementary school less than ½ mile from it. Why were they not consulted at all during the EA process and why does the EA not address the risk factors associated with this, given that the proposed fuels to be housed at the site are known carcinogens, amongst a variety of other heath concerns. How and when will Million Air address this in a way that is public and accountable to the community?

Response 2: The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a).

In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 3: *Hawaii is home to over 400 endangered species. Why does this draft EA not recognize or address any of them? Why is a full Environmental Impact Survey not being undertaken, particularly as part of the proposed project will involve destroying open green space to make way for the fuel farm's concrete pad.*

Response 3: No adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action. HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. Section 3.5.1 (Flora and Fauna) of the Final EA has been updated with the foregoing information.

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 4: *JRF is 30 feet above sea level. With the rapid exposure to sea level rise, JRF will be under water within the next few decades. How will Million Air mitigate sea level rise at JRF? What happens if there is a Tsunami? The devastation in Japan after the earthquake on the nuclear facility was insane. On a local level what happens to our community if we have every soaked in Jet fuel after houses and buildings are damaged.*

Response 4: Section 3.1 (Climate & Climate Change) and Section 3.4.1 (Sea Level Rise) of the EA include discussions related to potential climate change impacts, including sea level rise. With regard to the proposed action's impact on climate change, Section 3.1 of the EA states:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

With regard to sea level rise, Section 3.4.1 of the EA states:

> *If GHG emissions are maintained at its current rate of increase, the Intergovernmental Panel on Climate Change (IPCC) (2014) predicts up to 3.2 feet of global sea level rise by the year 2100. However, recent observations and projections show that this magnitude of sea level rise could occur as early as year 2060 under recently published high-end scenarios (Sweet et al., 2017). There are questions and debate around the exact timing of that rise due largely to uncertainties around the future behavior of the Earth's cryosphere and global GHG emission trajectories.*

> *The project site is not located within the 3.2-foot or 6-foot sea level rise exposure area (SLRXA) as depicted by the National Oceanic and Atmospheric Administration (NOAA) Sea Level Rise data (See Figure 3-4: Sea Level Rise Exposure Map).*

We acknowledge that the potential for tsunamis while relatively rare is present. Irrespective of the mitigation measures taken, the unpredictable and sometimes destructive nature of tsunamis ultimately limits the extent of practical measures that can be taken to avoid tsunami impacts. However, we would like to note that the project site is located outside of the extreme tsunami evacuation zone, as determined by City and State Civil Defense agencies with the intent to foster tsunami preparedness. Please refer to Figure 3-6 of the EA.

Comment 5: *What is the impact of a fuel spill on our groundwater systems? What about the leaks at Red Hill facility is still causing problems and will be a problem for many more years. This is a real concern for our community. How will Million Air address these issues? JRF is already subject to flooding during heavy rains, how will their proposed projects impact the risk of flooding, and why has the EA not addressed this issue? Further to this, how will Million Air ensure that the chemicals and fuels they utilize in their business will not end up in our ground water, in the ocean, or the environment at large during such flooding events?*

Response 5: Please refer to the response to Comment #2. Also, the Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Donna Sanchez <ewagirl@gmail.com>
Sent: Tuesday, March 9, 2021 6:30 PM
To: herman.tuiolosega@hawaii.gov; Public Comment
Subject: Million Air

Aloha,

Residents of Kapolei and West Oahu have many concerns about the possibility of Million Air locating at Kalaeloa Air Field. We are trying to figure out why there hasn't been any outreach for community input? This push from state level to endorse this huge business, without hearing the concerns from the community, can lead some of us to wonder *"why the rush?"* ***Local people care about the aina, and fuel farms coming into our backyards & local communities*** without communication seems very negligent.

We know that Hawaii is trying to get away from *fossil fuels*, so how do you explain this influx of jet fuel? What about concerns of aircraft engine emissions that can affect our health? What about possible runoff of *pollutants* into our nearby water?

We care about the aina, the people, the water, aquatic life, the birds, Heritage Park... Why are our state leaders and representatives not addressing these types of concerns?

I am not anti- business, anti-progress, anti-growth, but many of us do feel like Million Air and the State of Hawaii are not doing their due diligence. We have a right to answered questions and to a thorough Environmental Assessment of the planned projects that will impact our area.

Mahalo,
Donna Sanchez

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Donna Sanchez
Email: ewagirl@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Sanchez:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Residents of Kapolei and West Oahu have many concerns about the possibility of Million Air locating at Kalaeloa Air Field. We are trying to figure out why there hasn't been any outreach for community input? This push from state level to endorse this huge business, without hearing the concerns from the community, can lead some of us to wonder* "why the rush?" **Local people care about the aina, and fuel farms coming into our backyards & local communities** *without communication seems very negligent.*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021. Also, the Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association to the proposed action.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 2: *We know that Hawaii is trying to get away from* fossil fuels*, so how do you explain this influx of jet fuel? What about concerns of aircraft engine emissions that can affect our health? What about possible runoff of* pollutants *into our nearby water?*

Response 2: Airplanes rely primarily on the burning of fossil fuels for energy. Until alternative fuels or technology have been fully developed for general use or for widespread adoption, it is anticipated that airplanes will continue to rely primarily on the burning of fossil fuels for energy. As such, the proposed action involves providing storage options for common fuel types. It is anticipated that storage of the fuel will minimize the amount of fuel handling associated with aircraft operations.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 3: *We care about the aina, the people, the water, aquatic life, the birds, Heritage Park... Why are our state leaders and representatives not addressing these types of concerns?*

Response 3: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

Specific to the Kalaeloa Heritage Park, the Kalaeloa Heritage Park site is described on the Kalaeloa Heritage and Legacy Foundation website as a relatively undisturbed, 77-acre parcel with over 177 recorded cultural sites that consist of a heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park. No impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action.

Comment 4: *I am not anti- business, anti-progress, anti-growth, but many of us do feel like Million Air and the State of Hawaii are not doing their due diligence. We have a right to answered questions and to a thorough Environmental Assessment of the planned projects that will impact our area.*

Response 4: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment

pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Duane Eldredge <deldredge@hawaiiflightschool.com>
Sent: Tuesday, March 9, 2021 11:56 AM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Concerns Regarding Million Air

Kapolei is quickly becoming Oahu's second big city and has seen substantial development during the past decade alone. What effects will this airport's emissions have on the developing social aspects of Kapolei and what types of precautions or proactive steps is Million Air taking to address this?

- **Culture is a core value and priority to the Hawaiian people and community. However, Million Air hasn't made efforts to seek input from the community, why is that?**

- **The new renewable energy policy states that Hawaii will be 100% energy efficient by the year 2045. Is this something that Million Air has taken into account? And what company protocols or programs support this statewide goal? We already have a lot of power outages at the airport, so how is adding electricity for a massive fuel farm and a $12million hangar not going to negatively impact us? What steps is Million Air putting in place to make sure that they don't overwhelm the already limited and poor power output at Kalaeloa, and not make things worse for us or other businesses?**

- **Although the draft EA states that the proposed project will not have any sort of impact on public health, it is still a main concern amongst community members and spokespeople. Given that an FBO and fuel farm utilizes many known chemicals and agents known to be highly toxic how is Million Air going to monitor and take into consideration the health impacts on the nearby and extended public areas?**

- **For individuals who are moving or relocating to the westside of O'ahu to avoid the hustle and bustle of the main city, Honolulu, how will Million Air avoid noise pollution concerns and issues? How will Million Air's efforts to expand business at Kalaeloa impact the community?**

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Duane Eldredge
Email: deldredge@hawaiiflightschool.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Eldredge:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Kapolei is quickly becoming Oahu's second big city and has seen substantial development during the past decade alone. What effects will this airport's emissions have on the developing social aspects of Kapolei and what types of precautions or proactive steps is Million Air taking to address this?*

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 2: *Culture is a core value and priority to the Hawaiian people and community. However, Million Air hasn't made efforts to seek input from the community, why is that?*

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021. Also, the applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action.

Comment 3: *The new renewable energy policy states that Hawaii will be 100% energy efficient by the year 2045. Is this something that Million Air has taken into account? And what company protocols or programs support this statewide goal? We already have a lot of power outages at the airport, so how is adding electricity for a massive fuel farm and a $12million hangar not going to negatively impact us? What steps is Million Air putting in place to make sure that they don't overwhelm the already limited and poor power output at Kalaeloa, and not make things worse for us or other businesses?*

Response 3: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations.

Comment 4: *Although the draft EA states that the proposed project will not have any sort of impact on public health, it is still a main concern amongst community members and spokespeople. Given that an FBO and fuel farm utilizes many known chemicals and agents known to be highly toxic how is Million Air going to monitor and take into consideration the health impacts on the nearby and extended public areas?*

Response 4: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 5: *For individuals who are moving or relocating to the westside of O'ahu to avoid the hustle and bustle of the main city, Honolulu, how will Million Air avoid noise pollution concerns and issues? How will Million Air's efforts to expand business at Kalaeloa impact the community?*

Response 5: Military and general aviation aircraft and personnel are anticipated to use the proposed facilities. Types of planes will consist of military transport, support, and fighter aircraft. Additionally, small to medium general aviation aircraft are also anticipated to utilize the facilities. The aircraft will be no different from the types of aircraft that are currently being serviced at the airport.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Elaine Balthazar-Chang <ebcscoops@yahoo.com>
Sent: Wednesday, March 10, 2021 8:21 AM
To: Public Comment
Subject: EIS Exemption Opposition

>>>>>> Aloha Mr. Okamoto,

>>>>>> First and Foremost:

>>>>>> I am opposing, allowing the new FBO, Million Air to move forward with their proposed plan without completing an EIS.

>>>>>> As a teacher, I have several concerns and questions as listed below:

>>>>>> 1. What will the impact of storing large amounts of aviation fuel in close proximity to neighboring schools and communities have on our children and ohana?

>>>>>> 2. Cognitive learning is very important for our keiki. How will they be protected from fuel emissions and toxicity?

>>>>>> 3. What safety measures will the EPA impose on Million Air in regards to air and noise pollution?

>>>>>> 4. Is there a secure and safety plan in place to protect the public's health? If so , what is it?

>>>>>> 5. It behooves me, that this new proposed project has not been shared with the surrounding schools, communities and businesses.

>>>>>> What does the EPA plan to do to get the community's input before starting the development of this project?

>>>>>> 6. If the EPA required a completion of an EIS in the past, under what circumstances would they exempt an EIS now especially since times have changed?

>>>>>> 7. Environmental concerns include but are not limited to water quality, resources, public interest, air and noise pollution.

>>>>>> Will each environmental concern be publicly addressed and how will the EPA ensure that Million Air will protect the people of Hawaii?

>>>>>> There should be equal rights and equal treatment for all which has always been a practice in the State of Hawaii known as the melting pot of all races.

>>>>>> Therefore, if the EPA is considering to grant an EIS exemption to Million Air, it should not be based on the company's monetary means or the additional benefits outside of this new development that the State of Hawaii will receive.

>>>>>> In addition, an EIS exemption should not be used for the sole purpose of quickly moving forward a company's development plan.

>>>>>> Having an EIS is extremely important to our sacred AINA and our PEOPLE.

>>>>>> UA MAU KE EA O KA AINA I KA PONO
>>>>>> "The life of the land is perpetuated in righteousness"

>>>>>> I am asking you to please allow our people's voices to be heard.

>>>>>> Please show us respect by requiring FBO, Million Air to complete an EIS before moving forward with any new development plans.

>>>>>> Mahalo For Your Understanding and Consideration,

>>>>>> Mrs. BalthazarChang
>>>>> Teacher/Business Owner

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mrs. Elaine Balthazar-Chang
Email: ebcscoops@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mrs. Balthazar-Chang:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I am opposing, allowing the new FBO, Million Air to move forward with their proposed plan without completing an EIS.*

As a teacher, I have several concerns and questions as listed below:

1. What will the impact of storing large amounts of aviation fuel in close proximity to neighboring schools and communities have on our children and ohana?

Response 1: To mitigate potential hazards associated with the storage of fuel, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools.

In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Comment 2: *Cognitive learning is very important for our keiki. How will they be protected from fuel emissions and toxicity?*

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 3: *What safety measures will the EPA impose on Million Air in regards to air and noise pollution?*

Response 3: Please refer to the response for Comment #2 regarding air quality. Regarding noise, Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 4: *Is there a secure and safety plan in place to protect the public's health? If so, what is it?*

Response 4: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

There is always a slight environmental concern with all projects as it is difficult to prevent all impacts. However, measures have been incorporated into the design to mitigate environmental risk to the maximum extent practicable. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules. Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for the determination of no significant impact.

Comment 5: *It behooves me, that this new proposed project has not been shared with the surrounding schools, communities and businesses.*

Response 5: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed

action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 6: *What does the EPA plan to do to get the community's input before starting the development of this project?*

Response 6: As discussed in the response to Comment #5, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021. In addition, the Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action.

Comment 7: *If the EPA required a completion of an EIS in the past, under what circumstances would they exempt an EIS now especially since times have changed?*

Response 7: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 8: *Environmental concerns include but are not limited to water quality, resources, public interest, air and noise pollution. Will each environmental concern be publicly addressed and how will the EPA ensure that Million Air will protect the people of Hawaii?*

Response 8: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Comment 9: *There should be equal rights and equal treatment for all which has always been a practice in the State of Hawaii known as the melting pot of all races. Therefore, if the EPA is considering to grant an EIS exemption to Million Air, it should not be based on the company's monetary means or the additional benefits outside of this new development that the State of Hawaii will receive.*

In addition, an EIS exemption should not be used for the sole purpose of quickly moving forward a company's development plan.

Having an EIS is extremely important to our sacred AINA and our PEOPLE.

UA MAU KE EA O KA AINA I KA PONO
"The life of the land is perpetuated in righteousness"

I am asking you to please allow our people's voices to be heard.

Please show us respect by requiring FBO, Million Air to complete an EIS before moving forward with any new development plans.

Response 9: Please refer to the response to Comment #7.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Eugene Chong <echong@bpaviation.com>
Sent: Monday, March 8, 2021 2:58 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Questions regarding Million Air and it's respective Environmental Impact Assessment

Hello,

I attached questions pertaining to the proposed expansion at Kalaeloa Airport:

1. Regarding land use by airports creating waste and ground congestion, how does Million Air plan to address this issue to allow other sectors in the community to prosper? How will Million Air's proposed facilities and the traffic they generate impact current and future occupants at the airport? How will HDOTA ensure that competition remains viable at the airport as required by FAA regulations?
2. How does DOTA's master plan affect long term uses of the environment? How will their facilities impact various aspects of the environment such as endangered species, run off, flooding, etc, and how will Million Air accurately assess these without undertaking a full EIS?
3. Does JRF's current energy plan address 100% renewable energy by 2045? How will Million Air's facilities impact energy availability and utilization at Kalaeloa? How will they be compliant with the renewable energy requirements?
4. How does Million Air know that archeological sites in the area will not be affected? A full EIS should be required to determine the extent of potential hazards. Why did the draft EA reference SHPD but SHPD was not one of the agencies contacted during the EA process? Why was the Oahu Burial Council also not notified?
5. Did Million Air consider how the increased traffic affects the safety of the elementary school students located nearby?
6. How often will Million Air be testing air quality and what is the acceptable range for student exposure?
7. Shouldn't an EIS be done to study the full impact of increasing traffic 10-fold at JRF?
8. Do emissions have any impact on local residents? Pets? Local endangered species? Why was this not fully addressed in the EA?
9. Is it possible for a fuel spill to reach the ocean with heavy rains? What about impacting neighboring organizations and tenants? A school is located directly across the street from the proposed fuel facility, how will the facility and any potential spills impact keiki?

Best regards,

Eugene K.Y.S. Chong
Controller
Barbers Point Aviation Services / Barbers Point Flight Schools / Pacific Air Charters
91-1259 Midway Road, Bldg 104, Suite 1
Kapolei, HI 96707
O 808-797-2961

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Eugene Chong
Controller
Barbers Point Aviation Services
91-1259 Midway Road, Building 104, Suite 1
Kapolei, Hawaii 96707

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Chong:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Regarding land use by airports creating waste and ground congestion, how does Million Air plan to address this issue to allow other sectors in the community to prosper? How will Million Air's proposed facilities and the traffic they generate impact current and future occupants at the airport? How will HDOTA ensure that competition remains viable at the airport as required by FAA regulations?*

Response 1: Section 3.13.4 (Solid Waste Collection and Disposal) of the EA states:

> *No short or long-term significant impacts to municipal solid waste collection and disposal facilities are anticipated as a result of the construction and operation of the proposed project.*
>
> *Short-term impacts are anticipated in the form of construction debris that will be generated requiring disposal. The construction contractor shall be responsible for the proper disposal of construction debris at a CCH-approved disposal site. In accordance with HAR, Chapter 11-58.1, Solid Waste Management Control. No secondary or cumulative impacts to solid waste facilities would occur from the implementation of the proposed action.*

No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm

facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

With regard to ensuring competition remains viable at the airport, we note that the proposed action would occupy only a portion of the many lease lots developed and evaluated under HDOT's *Final Environmental Assessment/Finding of No Significant Impact for the Kalaeloa Airport Development Plan Improvements*. HDOT-A will continue to assess and evaluate future proposals to occupy the remaining lease lots as they come in accordance with FAA requirements.

Comment 2: *How does DOTA's master plan affect long term uses of the environment? How will their facilities impact various aspects of the environment such as endangered species, run off, flooding, etc, and how will Million Air accurately assess these without undertaking a full EIS?*

Response 2: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 3: *Does JRF's current energy plan address 100% renewable energy by 2045? How will Million Air's facilities impact energy availability and utilization at Kalaeloa? How will they be compliant with the renewable energy requirements?*

Response 3: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 4: *How does Million Air know that archeological sites in the area will not be affected? A full EIS should be required to determine the extent of potential hazards. Why did the draft EA reference SHPD but SHPD was not one of the agencies contacted during the EA process? Why was the Oahu Burial Council also not notified?*

Response 4: In Section 1.4 of the EA, we discuss previous environmental documentation at JRF that serves as a basis for the current assessment. As part of the U.S. Navy's 1999 Final Environmental Impact Statement (EIS), extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

We note that the current project site was included in the scope of the surveyed area, which at the time was already in use as an airport. Based on the findings of those previous studies, no archaeological sites were located at the project site or within JRF. Of the twelve historic structures identified as eligible for listing on the National Register of Historic Places (NRHP), only three of these structures, the Air Traffic Control Tower, Hangars 110 and 111 were located within JRF. These structures are not located in the immediate vicinity of the project site, and the proposed action will not involve any improvements to these structures.

In addition, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project. Since the project site assessed in the 2010 Final EA includes the proposed Fixed Base Operation (FBO) site, there is reason to believe that a similar determination will be made for proposed FBO project.

Based on the foregoing information, it is reasonable to believe that the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity. As such, the Oahu Burial Council was not notified as part of the environmental review process, but that does not preclude them from being contacted in the future should it be necessary. Additionally, we note that Section 3.6 (Historic, Archaeological and Cultural Resources) of the Final EA has been updated to state:

> *The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If required, any studies or field inspections will be initiated, and the resulting report will be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.*

Comment 5: *Did Million Air consider how the increased traffic affects the safety of the elementary school students located nearby?*

Response 5: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 6: *How often will Million Air be testing air quality and what is the acceptable range for student exposure?*

Response 6: The State of Hawaii, Department of Health (DOH), Clean Air Branch is the agency responsible for monitoring the ambient air quality in the State for various gaseous and particulate air pollutants, and the agency responsible for regulating and monitoring pollution sources to ensure that levels of criteria pollutants remain well below the State and federal ambient air quality standards set forth by the U.S. Environmental Protection Agency (EPA). There is an existing air quality monitoring station located about 1 mile from the project site in Kapolei. According to Hawaii Ambient Air Quality Data, the quality of air in the project area is good as no major air pollutant generators operate in the vicinity.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Regarding emissions effect on children, the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Comment 7: *Shouldn't an EIS be done to study the full impact of increasing traffic 10-fold at JRF?*

Response 7: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination.

With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 8: *Do emissions have any impact on local residents? Pets? Local endangered species? Why was this not fully addressed in the EA?*

Response 8: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

Comment 9: *Is it possible for a fuel spill to reach the ocean with heavy rains? What about impacting neighboring organizations and tenants? A school is located directly across the street from the proposed fuel facility, how will the facility and any potential spills impact keiki?*

Response 9: The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Michael Hruby <Mike@fivestartrans.com>
Sent: Thursday, March 4, 2021 8:32 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: Million Air at Barbers Point

Aloha,

I would like to submit my comments and concerns regarding the impending arrival of Million Air to Barbers Point airfield.

We operate our business a short few blocks away and are concerned about the gases and particles emitted from aircraft engines. They can cause harmful effects in different stages of the flight. How do these particles affect the health and safety of our business and the surrounding businesses? There are 2 schools with open air study groups next door to us.

Please register my concerns and request that the proper authorities vet this operation and require an EIS.

Thank you.

Regards,

FiveStar
Distribution Logistics Transportation
1930 Auiki St. Honolulu 96819

Michael Hruby
President

Tel: (808) 838-7827
Cell: (808) 620-3405
Fax: (808) 838-1222
Mike@fivestartrans.com
www.fivestartrans.com

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Michael Hruby
President
FiveStar
1930 Auiki Street
Honolulu, Hawaii 96819
Email: Mike@fivestartrans.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Hruby:

Thank you for your comments dated March 4, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I would like to submit my comments and concerns regarding the impending arrival of Million Air to Barbers Point airfield.*

We operate our business a short few blocks away and are concerned about the gases and particles emitted from aircraft engines. They can cause harmful effects in different stages of the flight. How do these particles affect the health and safety of our business and the surrounding businesses? There are 2 schools with open air study groups next door to us.

Please register my concerns and request that the proper authorities vet this operation and require an EIS.

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: ford matsunaga <ford.matsu88@gmail.com>
Sent: Sunday, March 7, 2021 8:00 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: EA Questions

Hi there.

I have some questions about the EA that are of my concerns

Shouldn't Million Air consult with the community before moving forward with this project?

Did Million Air consult any native Hawaiians while working on this EA?

Isn't this similar to TMT? Outside company coming in to supposedly help Hawaii but they are taking more land from Hawaiians.

How can Million Air say climate change is not real?

1 airport is enough. Why does Hawaii need one on the west side?

How does this project benefit local residents?

Why is this project moving forward in a pandemic? Shouldn't we be focused on stopping the covid before addressing other concerns?

What are the impacts of increased fuel emissions on our coral reefs?

Kalaeloa airport is so close to the beach? How is Million Air so sure that fuel is not seeping into our ocean?

Have studies been done to see how this will affect our near shore fishing?

Ford

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Ford Matsunaga
Email: ford.matsu88@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Matsunaga:

Thank you for your comments dated March 7, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I have some questions about the EA that are of my concerns*
Shouldn't Million Air consult with the community before moving forward with this project?

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 2: *Did Million Air consult any native Hawaiians while working on this EA?*

Response 2: During the early consultation phase previously described, we note that the Office of Hawaiian Affairs was consulted regarding the project and provided comments, which have been addressed and appended to the Final EA.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 3: *Isn't this similar to TMT? Outside company coming in to supposedly help Hawaii but they are taking more land from Hawaiians.*

Response 3: The project site is located within the existing Kalaeloa Airport (JRF). JRF is owned by the State of Hawaii and is under the control and management of the HDOT-A. According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 4: *How can Million Air say climate change is not real?*

Response 4: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 5: *1 airport is enough. Why does Hawaii need one on the west side?*

Response 5: Prior to its current use, JRF was an airfield at the Naval Air Station (NAS) Barbers Point. In conjunction with the closure of NAS Barbers Point, a *Final Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station Barbers Point* (1999) was prepared for the U.S. Navy. The 1999 Final EIS evaluated four reuse alternatives, each emphasizing various types of development, including residential, light industrial, recreation, and commercial. Three of the four alternatives included a general aviation reliever airport. A fifth alternative, the no action alternative, was also evaluated and assumed the existing airfield would not be used and, along with other surplus land, would be retained by the U.S. Navy in caretaker status.

The FEIS stated that the airport, in the preferred alternative would solve the problem of an unsatisfactory mix of small, light general aviation and large, heavy air carrier aircraft operations at HNL. JRF would serve

about 60 percent of the small single-engine and light twin-engine propeller aircraft forecasted to be based at HNL by the year 2020 and would serve about 50 percent of the general aviation aircraft projected to be based at Dillingham Airfield (HDH), also known as Kawaihapai Airport. Accordingly, the FEIS projected that approximately 105,900 annual general aviation aircraft operations from HNL and HDH could be served by JRF by the year 2020. The HDOT-A plan to terminate the HDH lease on June 30, 2021 may increase GA activity at JRF. However, this activity is not anticipated to be a significant increase over the aviation activity associated with the use of the site for the former NAS Barbers Point.

Comment 6: *How does this project benefit local residents?*

Response 6: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action. As discussed in Section 3.12 (Socio-Economic Characteristics) of the EA, the proposed action will provide many benefits for the community:

> *In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.*
>
> *In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.*

Combined with other past, present, and reasonably foreseeable future actions the proposed action would support the local economy and anticipated increased area population.

Comment 7: *Why is this project moving forward in a pandemic? Shouldn't we be focused on stopping the covid before addressing other concerns?*

Response 7: We are unable to speak to the priorities of the State during the pandemic as it is outside the scope of the EA. However, we would like to note that in consideration of the economic impacts brought on by the pandemic over the past year, the proposed action is likely to have a beneficial impact on the local economy as it would provide an alternative source of revenue to the State in the form of excise, individual, and corporate taxes. In addition, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.

Comment 8: *What are the impacts of increased fuel emissions on our coral reefs?*

Response 8: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an*

> *overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 9: *Kalaeloa airport is so close to the beach? How is Million Air so sure that fuel is not seeping into our ocean?*

Response 9: The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 10: *Have studies been done to see how this will affect our near shore fishing?*

Response 10: The project site is located within JRF. Access to the project site is controlled by the HDOT-A and by assurances made by HDOT-A to the U.S. Department of Transportation, Federal Aviation Administration (FAA). HDOT-A and FAA policies limit the project site to aviation activities. The proposed action will not affect surrounding roads or paths currently used to access the beach, nor would it impede access to the shoreline. As such, construction of the proposed action is not anticipated to affect near shore fishing activities.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Frederick Turshman <fturshman@hotmail.com>
Sent: Saturday, March 6, 2021 2:17 PM
To: Public Comment <publiccomment@wilsonokamoto.com>; herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: Kalaeloa PHJR proposed changes

To all concerned,

Kalaeloa airport (PHJR) is a lightly used public airfield located in the rapidly expanding area of Kapolei. The airfield is a general use airfield operated by the State of Hawaii. The primary users of the airfield are small, single engine aircraft operated by local residents. These aircraft are primarily used for training purposes or flown for personal use in the local surrounding airspace. A small percentage of aircraft utilizing the airfield are scheduled charter aircraft, transient general aviation or corporate aircraft.

The remaining aircraft utilizing PHJR include US Coast Guard C-130 aircraft stationed there, as well as transient USAF and USN aircraft.

Barbers Point Aviation Services is the single FBO on the airfield offering services and fuel to all aircraft utilizing the airfield. It is a small family run company that meets the current needs of all the above-mentioned aircraft currently using the airfield. The airfield is not overly busy, but it is a productive, integral part of the community.

I am writing to you to address some concerns I have with proposed changes to this airfield, and their ramifications to the community and surrounding area. Specifically, I'd like to discuss the possible addition to the airfield of a large mainland-based conglomerate like the Millionair FBO franchise.

1. **Increase in new type of air traffic**: Air traffic, specifically corporate aviation, at the airport will increase dramatically with the addition of a large corporate FBO like Millionair. The same number of small aircraft and military aircraft will continue to utilize the airfield, but Millionair will introduce corporate jets to the airfield on a very large scale. It is what they do. It is their business model to cater to the very wealthy, flying transient corporate and private jets. Look at each and every one of their operating facilities. This fact will be painfully obvious for the local environment once they begin operations, and difficult to undo.
2. **Noise levels:** Noise will undoubtedly increase. Small jets make big noises when they take off. Under current operations, an occasional jet departure is tolerated by the community. A steady stream of private departures is another matter.
3. **The carbon footprint:** Compared to the standard light plane or commercial aircraft, a corporate jet requires a disproportional amount of everything; gas, oil, lubricants, etc.. The local community of Kapolei and area surrounding PHJR will bear the majority of greenhouse gas and resource impact. Corporate and private jets are the gas guzzlers of the sky. Gases and particles emitted by the increased flight traffic will be enormous. Cleaning products and contaminated material byproducts will increase tenfold.
4. **Vehicle traffic:** Vehicle traffic associated with a large increase in corporate flights will also be detrimental to the current air and noise levels around the airfield. Additional vehicles would be polluting the area to cater to each flight. Personal transportation, catering vehicles and the associated pomp and circumstance would congest and pollute disproportionately. The local community will suffer to appease a select few. PHJR is a is an essential hub of local commerce, and some adverse effects are to be expected. But an entity like Millionair seeks to serve the needs of the very wealthy transiting the area with no concern for impact on the local community.

5. **Fuel storage:** In order to accommodate the increase in corporate traffic, additional fuel storage capacity must be added. The possible environmental impact and risk to the local community can't be underestimated.
6. **Local operations:** Has Millionair reached out to the local businesses currently operating on the field and the surrounding area? How is Millionair going to become part of the West Oahu infrastructure and community and not a just a corporation using local people and resources to ship money to the mainland?

Above is an abbreviated list of worries that myself and fellow community members share. This is not by any stretch the entire list of concerns we have, but feel we need to start somewhere. We worry about the fallout from a sudden change to PHJR and the surrounding area by an entity not concerned with local ramifications - environmental, social or cultural. We hope those making the decision to consider dramatically changing the airfield, its businesses and the local community consider all aspects and give the decision due process.

Thank you for your time, Aloha.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Frederick Turshman
Email: fturshman@hotmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Turshman:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Kalaeloa airport (PHJR) is a lightly used public airfield located in the rapidly expanding area of Kapolei. The airfield is a general use airfield operated by the State of Hawaii. The primary users of the airfield are small, single engine aircraft operated by local residents. These aircraft are primarily used for training purposes or flown for personal use in the local surrounding airspace. A small percentage of aircraft utilizing the airfield are scheduled charter aircraft, transient general aviation or corporate aircraft.*

The remaining aircraft utilizing PHJR include US Coast Guard C-130 aircraft stationed there, as well as transient USAF and USN aircraft.

Barbers Point Aviation Services is the single FBO on the airfield offering services and fuel to all aircraft utilizing the airfield. It is a small family run company that meets the current needs of all the above-mentioned aircraft currently using the airfield. The airfield is not overly busy, but it is a productive, integral part of the community.

I am writing to you to address some concerns I have with proposed changes to this airfield, and their ramifications to the community and surrounding area. Specifically, I'd like to discuss the possible addition to the airfield of a large mainland-based conglomerate like the Millionair FBO franchise.

Response 1: We appreciate the information provided on the existing conditions at the Kalaeloa Airport (JRF) and have incorporated the relevant information into the appropriate sections of Chapter 1 (Introduction) of the Final EA.

Comment 2: ***Increase in new type of air traffic****: Air traffic, specifically corporate aviation, at the airport will increase dramatically with the addition of a large corporate FBO like Millionair. The same number of small aircraft and military aircraft will continue to utilize the airfield, but Millionair will introduce corporate jets to the airfield on a very large scale. It is what they do. It is their business model to cater to the very wealthy, flying transient corporate and private jets. Look at each and every one of their operating facilities.*

This fact will be painfully obvious for the local environment once they begin operations, and difficult to undo.

Response 2: The proposed action is consistent with the current and planned use of the site and would not introduce any new uses that would significantly increase aircraft operations beyond previously existing levels associated with the former Naval Air Station (NAS) Barbers Point. Any potential impacts to airport operations and air traffic control will be mitigated through close coordination with HDOT-A.

Comment 3: ***Noise levels****: Noise will undoubtedly increase. Small jets make big noises when they take off. Under current operations, an occasional jet departure is tolerated by the community. A steady stream of private departures is another matter.*

Response 3: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity.

Comment 4: ***The carbon footprint****: Compared to the standard light plane or commercial aircraft, a corporate jet requires a disproportional amount of everything; gas, oil, lubricants, etc.. The local community of Kapolei and area surrounding PHJR will bear the majority of greenhouse gas and resource impact. Corporate and private jets are the gas guzzlers of the sky. Gases and particles emitted by the increased flight traffic will be enormous. Cleaning products and contaminated material byproducts will increase tenfold.*

Response 4: Section 3.1 (Climate & Climate Change) of the EA states:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action.

The proposed FBO will be subject to HAR, Chapter 19-17.1, Small Plane Hangar Units and Tie-Down Spaces at Public Airports. Specific sections of the rules relate to fire safety and flammable liquids, including paints, thinners, and solvents. HAR, Chapter 19-17.1, allows storage of flammable liquids if contained in approved closed metal containers of not more than five gallons. Further, use of these liquids will only be allowed in a designated area. The rules do not allow use of gasoline for the cleaning of aircraft or aircraft parts within hangars. Also, no person shall spray paints, dopes, solvents, primers, thinners, or similar flammable materials within a hangar. Waste oil and other flammable liquid waste shall not be kept in a hangar but shall be discarded in the receptacles provided for this purpose. These rules are to protect the project site and surrounding areas from adverse impacts from use of the hazardous and flammable materials.

In addition to the foregoing, DOT-A also has a BMP Field Manual for Operations at the State of Hawaii Airports that will be applicable to the proposed airport facilities. The Manual outlines requirements for tanks and the storage of drums or smaller quantities of products. These requirements include, but are not limited to, secondary containment and labeling.

For the mitigation of potential hazards associated with the storage of fuel, the facility design will utilize primary and secondary containment of fuel per the relevant state and federal requirements by utilizing double-wall tanks, curbed containment for the tanks and fuel transfer areas, and an oil/water separator to collect and treat stormwater. The design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA 103 – Standards for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. In addition, all line personnel are trained and certified per ATA 103 and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained. Furthermore, the Fuel Farm Facility will be subject to EPA SPCC Rule CFR Part 112 regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements.

Comment 5: ***Vehicle traffic****: Vehicle traffic associated with a large increase in corporate flights will also be detrimental to the current air and noise levels around the airfield. Additional vehicles would be polluting the area to cater to each flight. Personal transportation, catering vehicles and the associated pomp and circumstance would congest and pollute disproportionately. The local community will suffer to appease a select few. PHJR is a is an essential hub of local commerce, and some adverse effects are to be expected. But an entity like Millionair seeks to serve the needs of the very wealthy transiting the area with no concern for impact on the local community.*

Response 5: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

With regard to secondary impacts on air quality associated with a minor increase in traffic, Section 3.1 (Climate & Climate Change) of the EA states:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

With regard to secondary impacts on noise levels, noise from traffic is consistent with the industrial character of the nearby land uses. No significant increases in traffic volume are anticipated as a result of implementation of the proposed action, and therefore, would not have a significant adverse effect on nearby noise receptors especially given the general use of the area as an airport.

Comment 6: ***Fuel storage****: In order to accommodate the increase in corporate traffic, additional fuel storage capacity must be added. The possible environmental impact and risk to the local community can't be underestimated.*

Response 6: As discussed in the response to Comment #4, the Fuel Farm Facility design will utilize primary and secondary containment of fuel per the relevant state and federal requirements by utilizing double-wall tanks, curbed containment for the tanks and fuel transfer areas, and an oil/water separator to collect and treat stormwater. The design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA 103 – Standards for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. In addition, all line personnel are trained and certified per ATA 103 and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained. Furthermore, the Fuel Farm Facility will be subject to EPA SPCC Rule CFR Part 112 regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements.

Although full buildout of the project is projected to amount to eight (8) 30,000-gallon Jet A Fuel storage tanks, early design and programming of the Fuel Farm facility anticipates that three (3) 30,000-gallon above-ground horizontal storage tanks will be constructed, with the remaining balance would follow in response to market demand.

Comment 7: ***Local operations****: Has Millionair reached out to the local businesses currently operating on the field and the surrounding area? How is Millionair going to become part of the West Oahu infrastructure and community and not a just a corporation using local people and resources to ship money to the mainland?*

Response 7: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a).

In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action. As discussed in Section 3.12 (Socio-Economic Characteristics) of the Draft EA, the proposed action will provide many benefits for the community:

> *In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.*
>
> *In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.*

Combined with other past, present, and reasonably foreseeable future actions the proposed action would support the local economy and anticipated increased area population. Also, the Applicant intends to hire all employees locally with one possible exception. That is if a qualified, experienced General Manager cannot be hired, then the Applicant will go beyond Oahu, beginning with the other Hawaiian Islands before resorting to the mainland for recruiting.

Comment 8: *Above is an abbreviated list of worries that myself and fellow community members share. This is not by any stretch the entire list of concerns we have, but feel we need to start somewhere. We worry about the fallout from a sudden change to PHJR and the surrounding area by an entity not concerned with local ramifications - environmental, social or cultural. We hope those making the decision to consider dramatically changing the airfield, its businesses and the local community consider all aspects and give the decision due process.*

Response 8: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: HaynLegend22 <lonosoaresnoah@gmail.com>
Sent: Wednesday, March 10, 2021 3:37 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Million Air Questions
Attachments: Million Air Questions.pdf

Sent from my iPhone

Million Air

1. Why has Million Air failed to get community input in Hawai'i?
2. Study shows that airports emit several airborne chemicals during airport activities. What are the long term impacts of these exposures and why aren't they being addressed in the draft EA?
3. Would it be safe to have an elementary school next to a fuel farm?
4. How does airport activity affect the migratory paths of birds?
5. Has Million Air considered making any plans to help move Hawai'i to 100% renewable energy?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

HaynLegend22
Email: lonosoaresnoah@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear HaynLegend22:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Why has Million Air failed to get community input in Hawai'i?*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 2: *Study shows that airports emit several airborne chemicals during airport activities. What are the long term impacts of these exposures and why aren't they being addressed in the draft EA?*

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly

increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 3: *Would it be safe to have an elementary school next to a fuel farm?*

Response 3: To mitigate potential hazards associated with the storage of fuel, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Furthermore, the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Comment 4: *How does airport activity affect the migratory paths of birds?*

Response 4: As noted in Section 3.5.1 (Flora and Fauna) of the Draft EA, it is possible that migratory species, such as the Pacific Golden Plover and Wandering Tattler, may appear at the project site, as the species regularly occur in other open coastal areas of Oahu. This section goes on to further state that none of these species is a listed or candidate threatened or endangered species as set forth by the U.S. Fish and Wildlife Service (USFWS).

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). No impacts on the migratory paths of birds is anticipated with the implementation of the proposed action.

Comment 5: *Has Million Air considered making any plans to help move Hawai'i to 100% renewable energy?*

Response 5: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Hiiaka Jardine <jardineh@hawaii.edu>
Sent: Tuesday, March 9, 2021 9:24 AM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Kawailoa Project

Aloha,

It has come to my attention that there is intention to build a facility for aviation fuel storage in Kawailoa, near an elementary school. I am deeply concerned that the placement of this facility will be a danger and detriment to this community and other surrounding stake holders. Has an EIS been completed? Has the community had ample opportunity to voice their concerns? How was the community made aware of the project? As of this moment, I am in strong opposition to this proposed project as I do not think the responsible parties have done their due diligence in following the proper protocols with respect to such a project. I also strongly oppose this project because it is not in the best interest of the community.

Mahalo,
Hi'iaka

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Hi'iaka Jardine
Email: jardineh@hawaii.edu

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Jardine:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *It has come to my attention that there is intention to build a facility for aviation fuel storage in Kawailoa, near an elementary school. I am deeply concerned that the placement of this facility will be a danger and detriment to this community and other surrounding stake holders. Has an EIS been completed?*

Response 1: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *Has the community had ample opportunity to voice their concerns? How was the community made aware of the project? As of this moment, I am in strong opposition to this proposed project as I do not think the responsible parties have done their due diligence in following the proper protocols with respect to such a project. I also strongly oppose this project because it is not in the best interest of the community.*

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Jacob Sills <jsills@hawaiiflightschool.com>
Sent: Monday, March 8, 2021 12:48 PM
To: Public Comment
Subject: Environmental Concerns at Kalaeloa Airport

Hello and good evening,

I have some concerns regarding the new FBO "Million Air" coming to Kalaeloa. Below I have listed some questions what have come to mind about how this will affect the environment.

First, how will million air deal with the sewage problem that this airport has. Every time it rains the storm drains clog up and runoff spills onto the roads and ramp of the airport.

Secondly, how will the aircraft noise pollution be handled? As someone who lives near Kalaeloa this is a concern for my family as we already get so much noise pollution from aircraft coming into Honolulu.

Thirdly, the emissions from aircraft are both harmful to the environment but also to the people surrounding the airport. How is that going to effect both the people and environment?

fourthly, with Ko'olina being so close to the airport. How is the emissions from aircraft going to affect the tourism industry?

Lastly, how does the construction for million air's operation affect energy consumption? why has this not been addressed?

Thank you

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Jacob Sills
Email: jsills@hawaiiflightschool.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Sills:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How will million air deal with the sewage problem that this airport has. Every time it rains the storm drains clog up and runoff spills onto the roads and ramp of the airport.*

Response 1: Infrastructure capacity will be addressed during project design by the Applicant and relevant agencies and organizations. The proposed action is not anticipated to significantly impact wastewater system infrastructure in the region.

Comment 2: *How will the aircraft noise pollution be handled? As someone who lives near Kalaeloa this is a concern for my family as we already get so much noise pollution from aircraft coming into Honolulu.*

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 3: *The emissions from aircraft are both harmful to the environment but also to the people surrounding the airport. How is that going to effect both the people and environment?*

Response 3: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 4: *With Ko'olina being so close to the airport. How is the emissions from aircraft going to affect the tourism industry?*

Response 4: The Ko Olina Resort development is located approximately 2.65 miles away from JRF at its closest point. As discussed in the response to Comment #3, emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 5: *How does the construction for million air's operation affect energy consumption? Why has this not been addressed?*

Response 5: In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations. In addition, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Jacob Straube <jacob@airstraube.com>
Sent: Tuesday, March 9, 2021 5:43 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Million Air Environmental Impact

To whom it may concern,

- How does the emissions from aircrafts change the environment that residents live in and the climate of the area?
- What impacts have been made on social life due to the airport emissions and waste/ground congestion? What are the plans of Million Air to lessen the impact to the social life?
- Has there been any changes or impact towards the sea level with the increase in fuel emission usage?
- How does Million Air plan to integrate Hawaii's future energy plans of moving towards 100% renewable energy?
- As a mainland company, will they be taking inputs from the local community to determine if they would want to work with them considering the impacts on surrounding landowners?
- If there are any potential impacts, how will the company lessen the impact on Kalaeloa Heritage Park?

Thank you,
Jacob Straube

Get Outlook for iOS

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Jacob Straube
Email: jacob@airstraube.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Straube:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How does the emissions from aircrafts change the environment that residents live in and the climate of the area?*

Response 1: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 2: *What impacts have been made on social life due to the airport emissions and waste/ground congestion? What are the plans of Million Air to lessen the impact to the social life?*

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Regarding solid waste, no short or long-term significant impacts to municipal solid waste collection and disposal facilities are anticipated as a result of the construction and operation of the proposed project.

Short-term impacts are anticipated in the form of construction debris that will be generated requiring disposal. The construction contractor shall be responsible for the proper disposal of construction debris at a CCH-approved disposal site. In accordance with HAR, Chapter 11-58.1, Solid Waste Management Control. No secondary or cumulative impacts to solid waste facilities will occur from the implementation of the proposed action.

Regarding traffic, no significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 3: *Has there been any changes or impact towards the sea level with the increase in fuel emission usage?*

Response 3: Section 3.4.1 (Sea Level Rise) of the EA provides a project-related discussion on sea level rise. Specifically, Section 3.4.1 of the EA states:

> *The project site is not located within the 3.2-foot or 6-foot sea level rise exposure area (SLRXA) as depicted by the National Oceanic and Atmospheric Administration (NOAA)*

> *Sea Level Rise data (See Figure 3-4: Sea Level Rise Exposure Map). No short or long-term impacts on sea level rise are anticipated during construction or operation of the proposed project. The exact nature of how the sea level will rise and when is unknown. New information will continually be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to sea level rise.*

Comment 4: *How does Million Air plan to integrate Hawaii's future energy plans of moving towards 100% renewable energy?*

Response 4: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 5: *As a mainland company, will they be taking inputs from the local community to determine if they would want to work with them considering the impacts on surrounding landowners?*

Response 5: The applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association to the proposed action. The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

Comment 6: *If there are any potential impacts, how will the company lessen the impact on Kalaeloa Heritage Park?*

Response 6: The Kalaeloa Heritage Park site is described on the Kalaeloa Heritage and Legacy Foundation website as a relatively undisturbed, 77-acre parcel with over 177 recorded cultural sites that consist of a heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park. No impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Jaris Flora <jflora@bpaviation.com>
Sent: Tuesday, March 9, 2021 10:15 AM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Questions/Concerns, Million Air EA

To Whom it May Concern,

Below are a few concerns I have regarding Million Air's proposed EA.

How will the increase of air traffic effect current and future development of residential areas surrounding JRF, particularly in light of the massive new developments that were just announced that will be very quite close to the airport? What steps is Million Air taking to ensure their operations will not negatively impact residents?

How dooes the 1994 Environmental Baseline Survey and Navy's CLEAN (Comprehensive Long-term Environmental Action Navy) program accommodate Million Air's plans? Does this survey adequately address the current reality of Kalaeloa, and if not is/should Million Air be undertaking a new EIS in order to accurately assess their impact on the current environment.

The JRF community has been developed fourfold since the 2000 Census. What is JRF's current and future standings as being an urbanized area?

How will HDOT-A determine potential adverse impacts on flora and fauna on project site and surrounding areas if air traffic at JRF were to be increased four fold? Likewise how will Million Air's proposed plans, particularly for their fuel facility impact local flora and fauna, and what if any steps are Million Air taking to address them?

JRF has never had air traffic requiring 240,000 gallons of fuel storage. With increase of population and development in local area, how will it be determined if emissions have an impact on public health?

V/R,
Jaris Flora

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Jaris Flora
Email: Jflora@bpaviation.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Flora:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How will the increase of air traffic effect current and future development of residential areas surrounding JRF, particularly in light of the massive new developments that were just announced that will be very quite close to the airport? What steps is Million Air taking to ensure their operations will not negatively impact residents?*

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 2: *How dooes the 1994 Environmental Baseline Survey and Navy's CLEAN (Comprehensive Long-term Environmental Action Navy) program accommodate Million Air's plans? Does this survey adequately address the current reality of Kalaeloa, and if not is/should Million Air be undertaking a new EIS in order to accurately assess their impact on the current environment.*

Response 2: We understand that a baseline survey was performed on the base to identify hazardous wastes at the former NAS Barbers Point in compliance with the Base Realignment and Closure (BRAC) Restoration Program. We further understand that the Comprehensive Long-Term Environmental Action,

Navy (CLEAN) is a contract program that implements the Navy's Environmental Restoration Program on a regional basis. Based on current information provided on the U.S. Environmental Protection Agency (EPA) website regarding the status of clean ups at federal facilities, the EPA has determined that no further federal action will be taken at NAS Barbers Point.

A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 3: *The JRF community has been developed fourfold since the 2000 Census. What is JRF's current and future standings as being an urbanized area?*

Response 3: The project site, as well as JRF, is currently designated within the State's Urban District. The Urban District generally includes lands characterized by "city-like" concentrations of people, structures, and services. The District also includes vacant areas for future development. JRF is currently and will continue to be designated with the State's Urban District.

Comment 4: *How will HDOT-A determine potential adverse impacts on flora and fauna on project site and surrounding areas if air traffic at JRF were to be increased four fold? Likewise how will Million Air's proposed plans, particularly for their fuel facility impact local flora and fauna, and what if any steps are Million Air taking to address them?*

Response 4: A discussion of flora and fauna, including a description of the existing environment, potential impacts, and mitigation measures, is provided in Section 3.5.1 (Flora and Fauna) of the EA. Moreover, the proposed action is not anticipated or intended to significantly impact the capacity of aircraft operations at JRF. Instead, it will serve to facilitate, streamline, and improve the efficiency and commercial viability of GA, commercial, and military aircraft operations.

Comment 5: *JRF has never had air traffic requiring 240,000 gallons of fuel storage. With increase of population and development in local area, how will it be determined if emissions have an impact on public health?*

Response 5: As discussed in the response to Comment #1, the project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: John Bond <ewabond@gmail.com>
Sent: Tuesday, February 9, 2021 2:26 PM
To: Tuiolosega, Herman; sfreeman@pvillc.com; Keola Cheng; Public Comment; Daniel Martinez; John Bond
Subject: Kalaeloa JRF Fixed Base Operation (FBO) and Fuel Farm facility
Attachments: Map 2-1.jpg; IMG_7218-B.JPG

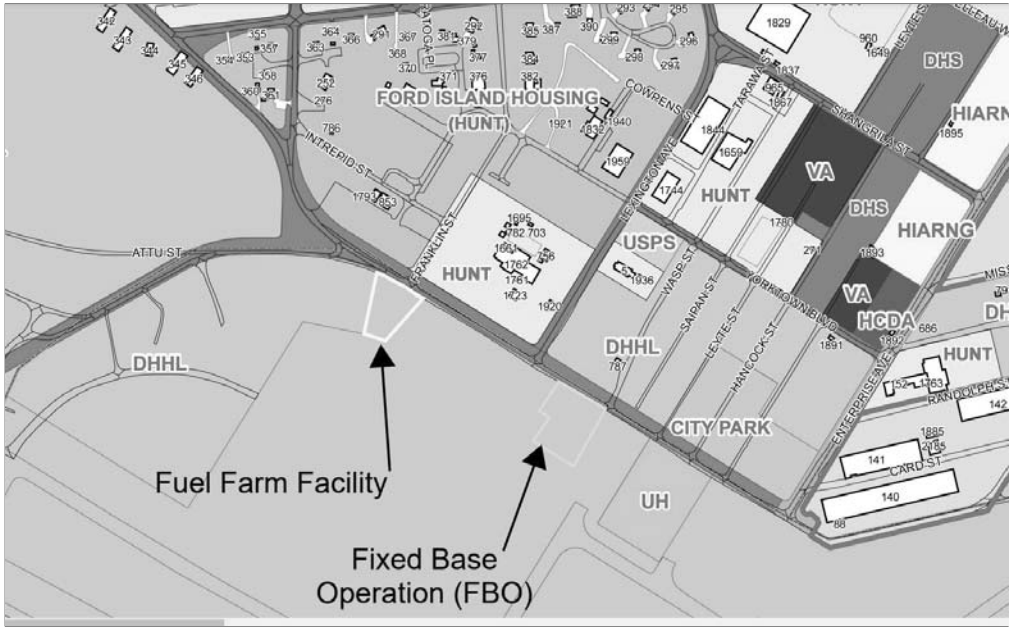
Aloha,

There is a very rare 1942 pillbox from Ewa Field that was stored in the planned fuel farm location. Please contact me asap about removal to new safe location.

John Bond
MCAS Ewa historian

http://oeqc2.doh.hawaii.gov/Doc_Library/2021-02-08-OA-DEA-Million-Air-Kalaeloa-FBO-and-Fuel-Farm-Facility.pdf

Fuel Farm facility, which is anticipated to encompass up to eight (8) 30,000- gallon Jet A Fuel above-ground, horizontal storage tanks. Also proposed for storage at the Fuel Farm facility is up to one (1) 15,000-gallon Aviation gas (Avgas) tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon gas tanks used by various motor vehicles (mogas).



WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. John Bond
Marine Corps Air Station Ewa Historian
Email: ewabond@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Bond:

Thank you for your comments dated February 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *There is a very rare 1942 pillbox from Ewa Field that was stored in the planned fuel farm location. Please contact me asap about removal to a new safe location.*

Response 1: We appreciate the information provided about the 1942 pillbox being stored at the planned Fuel Farm Facility site. The HDOT-A and the Applicant are working with the appropriate parties to ensure the safe relocation of the pillbox.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

From: John Sanchez <aumakua51@gmail.com>
Sent: Tuesday, March 9, 2021 9:05 PM
To: Public Comment
Subject: Environmental Concerns

To whom it may concern;

I am writing this email today to voice my concerns over a "major" re-purposing of the Kalaeloa AirField/John Rodgers Field (formerly Barbers Point Naval Air Station). I have grave concerns that the state is putting profit before respect for the environment and the local concerns. It appears that the state is looking to add significant commercial air operations in an area that is already severely impacted by two major airfields (Honolulu International and Hickam AFB). The U.S.Department of defense chose, as part of BRAC, to return the environmental sanctuary of Kalaeloa to the state. I do not understand how the state is looking to increase commercial air support at a facility more distanced from the downtown business and tourist areas of Honolulu. The western side of the island already suffers from major traffic issues and trips to town travel times rival Los Angeles traffic times. Additionally, the March 1, 2006 Hawaii Community Development Authority document regarding Kalaeloa clearly states that the plan for this land was to support the western side of the islands community and provide for increased office and commercial space (limiting the need for trips to town), addition of much needed affordable housing, opportunities for high tech development, alternative energy resource, new public schools and preservation of recreation open space and shorelines. Reviewing the proposal for this massive expansion of the airfield operations it appears that the state is not doing its due diligence by requiring a full scale environmental impact of this proposal. In light of the proposed 2006 plan and points I listed above, I respectfully ask the following questions of those government officials/representatives making the decisions.

1 How does the massive increase in fossil fuel storage and usage align with the states move to total reliance on renewable energy and has Million Air addressed this in their plan?

2 Hawaii is on the record as desiring to be completely sustained by renewable energy in its transportation sector. How will the state reconcile this massive increase in reliance on fossil fuels?

3 The draft EA seems to indicate a greater than ten fold increase in fossil fuel storage on site, this would seem to indicate a plan for a ten fold increase in air traffic. Has the state considered what impact this will have on the local residents as well as the local environment (i.e. excessive noise and lights as well as bird species nesting and flight patterns)?

4 Why has Million Air failed to get any local community input for this project? Culture and respect are in the fabric of Hawaiian society, this seems diametrically opposed.

5 The EA does not include any mention or indicate what the environmental impact on Kalaeloa Heritage Park would be. What would the impact be and how will it be mitigated?

6. How can additional public schools be constructed or affordable housing be created in close proximity to what seems like a very active commercial air operation? Are there safety concerns being overlooked?

In conclusion I feel that at a minimum a full environmental impact study should be conducted and community concerns addressed prior to any consideration of massive expansion of commercial air business at JRF.

I look forward to your response, Thank you.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. John S. Sanchez
Email: aumakua51@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Sanchez:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I am writing this email today to voice my concerns over a "major" re-purposing of the Kalaeloa AirField/John Rodgers Field (formerly Barbers Point Naval Air Station). I have grave concerns that the state is putting profit before respect for the environment and the local concerns. It appears that the state is looking to add significant commercial air operations in an area that is already severely impacted by two major airfields (Honolulu International and Hickam AFB). The U.S. Department of defense chose, as part of BRAC, to return the environmental sanctuary of Kalaeloa to the state. I do not understand how the state is looking to increase commercial air support at a facility more distanced from the downtown business and tourist areas of Honolulu. The western side of the island already suffers from major traffic issues and trips to town travel times rival Los Angeles traffic times. Additionally, the March 1, 2006 Hawaii Community Development Authority document regarding Kalaeloa clearly states that the plan for this land was to support the western side of the islands community and provide for increased office and commercial space (limiting the need for trips to town), addition of much needed affordable housing, opportunities for high tech development, alternative energy resource, new public schools and preservation of recreation open space and shorelines. Reviewing the proposal for this massive expansion of the airfield operations it appears that the state is not doing its due diligence by requiring a full scale environmental impact of this proposal. In light of the proposed 2006 plan and points I listed above, I respectfully ask the following questions of those government officials/representatives making the decisions.*

Response 1: As discussed in Section 1.4 (Previous Environmental Documentation at JRF) of the EA, the 1999 Final EIS prepared by the U.S. Navy evaluated four reuse alternatives, each emphasizing various types of development, including residential, light industrial, recreation, and commercial. Three of the four alternatives included a general aviation reliever airport. A fifth alternative, the no action alternative, was also evaluated and assumed the existing airfield would not be used and, along with other surplus land, would be retained by the U.S. Navy in caretaker status.

The selected preferred alternative proposed dividing the NAS property into mixed land uses. The largest land component of the preferred alternative was the airport, which consists of a general aviation reliever

airport and the University of Hawaii Aviation Training Center located in Hangar 111. The proposed action and the general aviation activities it would support are consistent with the U.S. Navy's 1999 Final EIS, which was issued a Record of Decision.

According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 2: *How does the massive increase in fossil fuel storage and usage align with the states move to total reliance on renewable energy and has Million Air addressed this in their plan?*

Response 2: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 3: *Hawaii is on the record as desiring to be completely sustained by renewable energy in its transportation sector. How will the state reconcile this massive increase in reliance on fossil fuels?*

Response 3: Airplanes rely primarily on the burning of fossil fuels for energy. Until alternative fuels or technology have been fully developed for general use or for widespread adoption, it is anticipated that airplanes will continue to rely primarily on the burning of fossil fuels for energy. As such, the proposed action involves providing storage options for common fuel types. It is anticipated that storage of the fuel will minimize the amount of fuel handling associated with aircraft operations.

Comment 4: *The draft EA seems to indicate a greater than ten fold increase in fossil fuel storage on site, this would seem to indicate a plan for a ten fold increase in air traffic. Has the state considered what impact this will have on the local residents as well as the local environment (i.e. excessive noise and lights as well as bird species nesting and flight patterns)?*

Response 4: As noted in Section 2.1 (Project Description) of the EA, early design and programming of the Fuel Farm facility anticipates that three (3) 30,000-gallon above-ground horizontal storage tanks will be constructed, with the remaining balance to follow in response to market demand. Storage of the fuel will help to minimize potential secondary impacts associated with fuel handling.

A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules

(HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 5: *Why has Million Air failed to get any local community input for this project? Culture and respect are in the fabric of Hawaiian society, this seems diametrically opposed.*

Response 5: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 6: *The EA does not include any mention or indicate what the environmental impact on Kalaeloa Heritage Park would be. What would the impact be and how will it be mitigated?*

Response 6: The Kalaeloa Heritage Park site is described on the Kalaeloa Heritage and Legacy Foundation website as a relatively undisturbed, 77-acre parcel with over 177 recorded cultural sites that consist of a heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park. No impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action.

Comment 7: *How can additional public schools be constructed or affordable housing be created in close proximity to what seems like a very active commercial air operation? Are there safety concerns being overlooked?*

Response 7: The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the

right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 8: *In conclusion I feel that at a minimum a full environmental impact study should be conducted and community concerns addressed prior to any consideration of massive expansion of commercial air business at JRF.*

Response 8: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: jon perry <perryjon422@gmail.com>
Sent: Wednesday, March 10, 2021 7:17 PM
To: Public Comment; herman.tuiolosega@hawaii.gov

Aloha,
I am emailing you with concerns I have pertaining to the environmental impact the new FBO, Million Air, will have on the surrounding community and environment. Listed below, are a few questions I have...

1. Family and community is very important in Hawaii's culture, why hasn't Million Air reached out to the community for their input or thoughts on their new FBO plan?

2. Airports increase emissions and waste that negatively impact social life. How will more traffic through John Rogers Field impact the fast growing, developing community of Kapolei and Ewa Beach?

3. How will the gasses and particles released from aircraft engines impact schools surrounding John Rogers Field such as the Renaissance Academy?

4. what impact does an additional 480,000 gallons of Jet-A fuel being stored at John Rogers Field have around the surrounding area?

5. What safety procedures will Million Air implement in storing the additional fuel?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Jon Perry
Email: perryjon422@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Perry:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Family and community is very important in Hawaii's culture, why hasn't Million Air reached out to the community for their input or thoughts on their new FBO plan?*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 2: *Airports increase emissions and waste that negatively impact social life. How will more traffic through John Rogers Field impact the fast growing, developing community of Kapolei and Ewa Beach?*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Regarding solid waste, Section 3.13.4 (Solid Waste Collection and Disposal) of the EA states:

> *No short or long-term significant impacts to municipal solid waste collection and disposal facilities are anticipated as a result of the construction and operation of the proposed project.*
>
> *Short-term impacts are anticipated in the form of construction debris that will be generated requiring disposal. The construction contractor shall be responsible for the proper disposal of construction debris at a CCH-approved disposal site. In accordance with HAR, Chapter 11-58.1, Solid Waste Management Control. No secondary or cumulative impacts to solid waste facilities will occur from the implementation of the proposed action.*

No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 3: *How will the gasses and particles released from aircraft engines impact schools surrounding John Rogers Field such as the Renaissance Academy?*

Response 3: Please refer to the discussion on emissions in the response to Comment #2. Additionally, the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not

anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Comment 4: *what impact does an additional 480,000 gallons of Jet-A fuel being stored at John Rogers Field have around the surrounding area?*

Response 4: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 5: *What safety procedures will Million Air implement in storing the additional fuel?*

Response 5: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Kailee Chang <kailee.bc11@yahoo.com>
Sent: Tuesday, March 9, 2021 7:15 PM
To: Public Comment; herman.tuiolosega@hawaii.gov
Subject: Environmental Concerns at Kalaeloa Airport

Aloha,
I am emailing you in regards to the Environmental Assessment of new construction of the FBO and Fuel Farm for Million Air. I have some questions and concerns about the environmental impact it will impose on the surrounding community.

1. How will the various types of fuel discussed in the EA be transported to the fuel tanks at the proposed fuel site? How is this regulated and how will Million Air manage that process and mitigate any and all risks associated with it?

2. Are there any toxic fumes, vapours, or aerosols that will be emitted from the fuel farm that may be hazardous for people to inhale? How will this impact the safety and health of individuals operating at and around the airport, including students that attend the school across the street? What is Million Air going to do to prevent this? Shouldn't a fuller assessment be undertaken to ensure the safety of the students?

3. Will the construction of the fuel farm and FBO impact the native species living in the area? What species are currently present in the surrounding area, are any of them endangered? How will this impact them, will it potentially cause any of them to die? How will Million Air verify that there aren't any? How will it continue to ensure none arrive in the future? How will Million Air manage all of this?

4. Being that the airport is a 24 hour operation, how does the community feel about the noise that occurs at any time of day?

5. What long-term impact will the fuel farm and FBO have on climate change and global warming? How will it be compliant with current environmental laws and regulations? What efforts will Million Air take to minimize the potential impact of such a significant increase in fuel at Kalaeloa will have on climate change?

As a concerned member of our community, I support Native Hawaiian business owners and I support these lands staying in the hands of Hawaiians. Mahalo for your time.

Best,
Kailee B.C.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Kailee Chang
Email: kailee.bc11@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Chang:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How will the various types of fuel discussed in the EA be transported to the fuel tanks at the proposed fuel site? How is this regulated and how will Million Air manage that process and mitigate any and all risks associated with it?*

Response 1: It is anticipated that the fuel provider will deliver fuel from the refinery to the fuel farm by using a properly licensed, registered and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. The near-term Fuel Farm capacity for storage is 90,000 gallons for Jet A fuel, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on the type of aircraft being serviced. A current estimate of deliveries is one to two times per week.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 2: *Are there any toxic fumes, vapours, or aerosols that will be emitted from the fuel farm that may be hazardous for people to inhale? How will this impact the safety and health of individuals operating at and around the airport, including students that attend the school across the street? What is Million Air going to do to prevent this? Shouldn't a fuller assessment be undertaken to ensure the safety of the students?*

Response 2: The proposed Fuel Farm Facility is required to meet the EPA's SPCC requirements, including development of a SPCC Plan that must be updated every 5 years or anytime assets or operations change, per EPA guidelines. The SPCC Plan outlines measures to prevent, detect, and contain spills or accidental releases. Additionally, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with EPA SPCC regulations to mitigate the risk of a release to the environment. Likewise, daily operational expired oil, fuels and other petroleum will be properly treated and managed.

Comment 3: *Will the construction of the fuel farm and FBO impact the native species living in the area? What species are currently present in the surrounding area, are any of them endangered? How will this impact them, will it potentially cause any of them to die? How will Million Air verify that there aren't any? How will it continue to ensure none arrive in the future? How will Million Air manage all of this?*

Response 3: No adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action. HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. Section 3.5.1 (Flora and Fauna) of the Final EA has been updated with the foregoing information. As noted in Section 3.5.1 (Flora and Fauna) of the Draft EA, it is possible that migratory species, such as the Pacific Golden Plover and Wandering Tattler, may appear at the project site, as the species regularly occur in other open coastal areas of Oahu. This section goes on to further state that none of these species is a listed or candidate threatened or endangered species as set forth by the U.S. Fish and Wildlife Service (USFWS).

Additionally, it is noted that the project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. Past development and use of the project site have made the area unsuitable to be used by endangered species for habitat or foraging.

Comment 4: *Being that the airport is a 24 hour operation, how does the community feel about the noise that occurs at any time of day?*

Response 4: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 5: *What long-term impact will the fuel farm and FBO have on climate change and global warming? How will it be compliant with current environmental laws and regulations? What efforts will Million Air take to minimize the potential impact of such a significant increase in fuel at Kalaeloa will have on climate change?*

Response 5: Section 3.1 of the EA addresses climate and climate change. The topic of global warming falls under this broader realm, and Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Kaleo Kamaka <kaleokamaka4@gmail.com>
Sent: Saturday, March 6, 2021 12:56 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Environmental Assessment Questions

Aloha,

Did Million Air consult any native Hawaiians before moving forward with this project? If so, which leaders in the community were consulted? Does fuel emissions have an impact on our sea turtles? Hawaii has many endangered species. What are the impacts of the project on these populations? How many state mammal bats have to die before the state takes a better look at how businesses impact the environment? I would feel more comfortable if this company did the work and provided the full details on how this will really affect our community? What are the energy concerns? Does Million Air have a green energy plan? How does this affect our long term renewable goals? It seems like this mainland company is not taking the process seriously. What is the changing that would need this expansion at Kalaeloa? How many planes actually fly into this airport? covid has significantly reduced air traffic? Why can't the State reevaluate after covid goes away? How do fuel emissions add to global warming and coral bleaching? How many Hawaiians have to suffer from mainland companies before we go noticed? Did Million Air take into consideration the impact this project will have on traffic? By adding more business at Kalaeloa airport it would increase traffic.

Please address my concerns. Mahalo

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Kaleo Kamaka
Email: kaleokamaka4@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Kamaka:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Did Million Air consult any native Hawaiians before moving forward with this project? If so, which leaders in the community were consulted?*

Response 1: During the early consultation phase, the Office of Hawaiian Affairs was consulted regarding the project and provided comments, which have been addressed and appended to the Final EA.

Comment 2: *Does fuel emissions have an impact on our sea turtles? Hawaii has many endangered species. What are the impacts of the project on these populations? How many state mammal bats have to die before the state takes a better look at how businesses impact the environment?*

Response 2: No adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action. HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. Section 3.5.1 (Flora and Fauna) of the Final EA has been updated with the foregoing information.

In addition, we note that the proposed Fixed-Base Operation (FBO) site is located on a pre-disturbed developed area, while the proposed Fuel Farm Facility site is situated on disturbed vacant land within the JRF property. There are no tall trees present within the project site and the proposed action will have no effect on tall trees located offsite that may be used by used by the Hawaiian hoary bat for habitat or foraging.

Comment 3: *I would feel more comfortable if this company did the work and provided the full details on how this will really affect our community?*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 3: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

There is always a slight environmental concern with all projects as it is difficult to prevent all impacts. However, measures have been incorporated into the design to mitigate environmental risk to the maximum extent practicable. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules. Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for the determination of no significant impact.

Comment 4: *What are the energy concerns? Does Million Air have a green energy plan? How does this affect our long term renewable goals? It seems like this mainland company is not taking the process seriously.*

Response 4: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 5: *What is the changing that would need this expansion at Kalaeloa?*

Response 5: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 6: *How many planes actually fly into this airport? covid has significantly reduced air traffic? Why can't the State reevaluate after covid goes away?*

Response 6: Data on existing aircraft operations from calendar year 2010 to 2020 was used in the assessment of potential impacts the proposed action may have on the environment. The data was not limited to the year 2020 when the pandemic may have affected flight activity. In addition, Section 1.5.2 (Aircraft Operations) of the EA states:

> *Over the years, aircraft operations at JRF have varied, most likely due to the high level of touch and go activity at the airport. From calendar year (CY) 2010 to 2020, the highest level of activity was CY 2018 with 162,699 total operations and the lowest was CY 2010 with 112,830 total operations, a difference of 49,859 total operations or roughly 44 percent of the lower bound.*

Comment 7: *How do fuel emissions add to global warming and coral bleaching?*

Response 7: Section 3.1 of the EA addresses climate and climate change. The topic of global warming and coral bleaching falls under this broader realm, and Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 8: *How many Hawaiians have to suffer from mainland companies before we go noticed?*

Response 8: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region. Furthermore, the Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action.

Comment 9: *Did Million Air take into consideration the impact this project will have on traffic? By adding more business at Kalaeloa airport it would increase traffic.*

Response 9: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to

two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Kathleen Popa <kapokalei17@gmail.com>
Sent: Monday, March 8, 2021 3:56 PM
To: Public Comment
Subject: Concerned Citizen Re: Freeman Holdings of Hawaii LLC dba Million Air Honolulu - Kalaeloa

To Whom It May Concern,

Is this really a project we need here in Hawaii on the Leeward Coast? Or better yet, WHY? With small businesses closing their doors due to this pandemic; how could we expect small businesses to thrive when we let outside companies "steal" more portions of our land with their money & greed?

For all of Hawaii; especially those living/working in the Waipahu, Ewa, Mililani, Kapolei, Honokai Hale, Nanakuli, Maile, Waianae, Makaha, Campbell Industrial & Ko'olina area's...how has the word gotten out to these hard working families and businesses about another GIGANTIC business from the America's trynna take over a portion of Kalaeloa field? How can this be? Is this business really hoping to bypass environmental assessments & impacts, meeting with community leaders, or involving our neighborhood boards for input & concerns, etc!!

I humbly ask you again, "does Hawaii really need another airport type operations or huge fuel tanks to desecrate our lands?" NO WE DO NOT!! You must know this plan includes building of additional hangars, eight (8) 30,000-gallon fuel tanks, one (1) 15,000-gallon aviation gas tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon gas tanks for motor vehicles!! This is insane!!

Many of us have family & friends who will be hugely impacted if you let these companies come onto our home-land and do what they want, wherever they want. This operation will surely close down schools, interrupt & possibly put local businesses out of work & what about the nearby oil refinery-won't it impact their operations as well?

I'm taking a stand & voicing my concerns because this isn't Pono. We need our voices heard!! Our children's well-being & future generations are counting on us to take a stand - to put an end to larger companies abusing our lands & taking away from our local businesses!!

Please reconsider this project as a top priority to go somewhere else. Give our people & communities a chance to thrive, remain in business & keep our lands in our hands. For our children & future generations to come.

Mahalo for your time & support.

Respectfully,
Mrs. Kathleen Popa
Mililani HI 96789
808.306.7497

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mrs. Kathleen Popa
Mililani, Hawaii 96789
Email: kapokalei17@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mrs. Popa:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Is this really a project we need here in Hawaii on the Leeward Coast? Or better yet, WHY? With small businesses closing their doors due to this pandemic; how could we expect small businesses to thrive when we let outside companies "steal" more portions of our land with their money & greed?*

Response 1: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Also, the economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

Comment 2: *For all of Hawaii; especially those living/working in the Waipahu, Ewa, Mililani, Kapolei, Honokai Hale, Nanakuli, Maile,Waianae, Makaha, Campbell Industrial & Ko'olina area's...how has the word gotten out to these hard working families and businesses about another GIGANTIC business from the America's trynna take over a portion of Kalaeloa field? How can this be? Is this business really hoping to bypass environmental assessments & impacts, meeting with community leaders, or involving our neighborhood boards for input & concerns, etc!!*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 3: *I humbly ask you again, "does Hawaii really need another airport type operations or huge fuel tanks to desecrate our lands?" NO WE DO NOT!! You must know this plan includes building of additional hangars, eight (8) 30,000-gallon fuel tanks, one (1) 15,000-gallon aviation gas tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon gas tanks for motor vehicles!! This is insane!!*

Response 3: Please refer to the response to Comment #1.

Comment 4: *Many of us have family & friends who will be hugely impacted if you let these companies come onto our home-land and do what they want, wherever they want. This operation will surely close down schools, interrupt & possibly put local businesses out of work & what about the nearby oil refinery - won't it impact their operations as well?*

Response 4: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

There is always a slight environmental concern with all projects as it is difficult to prevent all impacts. However, measures have been incorporated into the design to mitigate environmental risk to the maximum extent practicable. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules. Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for the determination of no significant impact.

Comment 5: *I'm taking a stand & voicing my concerns because this isn't Pono. We need our voices heard!! Our children's wellbeing & future generations are counting on us to take a stand - to put an end to larger companies abusing our lands & taking away from our local businesses!!*

Please reconsider this project as a top priority to go somewhere else. Give our people & communities a chance to thrive, remain in business & keep our lands in our hands. For our children & future generations to come.

Response 5: The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action. The Applicant and HDOT-A will receive a copy of this letter and have been made aware of your comments and concerns.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: kealoha chang <kealoha.chang@yahoo.com>
Sent: Tuesday, March 9, 2021 4:20 PM
To: Public Comment
Cc: K Chang
Subject: Kalaeloa Airport . The Barbers Point Aviation Services and Out of state - Million Air Interlink

Dear Mr. Okamoto

Thank you for your time to reading my email. **I am writing to you to express my opposition of the advancement of Million Air Interlinks proposal to build a facility based operation at Kalaeloa.**

I was surprised to learn of this venture through the recent Star Advertiser Sunday article. While this out of state business may have an impressive profile based on franchisees, there is a process and standard that all businesses in Hawaii have to follow.

The current business tenant that has been providing the described services - Barbers Point Aviation Services is a "kamaaina based company" that apparently has been providing exceptional services at this business location since 2012. Their tenure for continuance should surely be given weight on the matter.

Circumventing business standards, policy and practice can not be taken lightly.
1. I was not aware of any community related awareness or input in the news breaking of this venture. This solicitation for public input is the only means for community expression. There are living communities in the area; there are nearby schools and existing businesses - wouldn't they be affected by this project?

2. Why hasn't there been any sharing of the overall plan for Kalaeloa's airport operation from the SOH DOT or its Airport's Division other than the statement of Million Air's interest in this operation site. Shouldn't the general public be informed of the "master plan"?
- A subsequent article this past week described the plans of developers for new homes in this Kalaeloa community. At least this news was deemed worthy of explanation before implementation of action.

3. Clearly an investment program of this magnitude and investment will have an affect on the environment, easements, effects to the current location infrastructure and climate, which are currently concerning topics of importance. There was no mention of a timetable to produce a study with the impact of the planned structures that Million Air has said they are committed to building in their news release. Isn't a environmental impact study a state requirement for a project of this magnitude?

I am concerned as to the speed of this project. I will remain confident that the proper procedure will prevail. I am not opposed to new concepts or business competition. Thank you for your time and attention.

Respectfully submitted,

Dwayne Chang
Business Owner

Sent from Yahoo Mail on Android

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Dwayne Chang
Email: Kealoha.chang@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Chang:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Thank you for your time to reading my email.* ***I am writing to you to express my opposition of the advancement of Million Air Interlinks proposal to build a facility based operation at Kalaeloa.***

I was surprised to learn of this venture through the recent Star Advertiser Sunday article. While this out of state business may have an impressive profile based on franchisees, there is a process and standard that all businesses in Hawaii have to follow.

The current business tenant that has been providing the described services - Barbers Point Aviation Services is a "kamaaina based company" that apparently has been providing exceptional services at this business location since 2012. Their tenure for continuance should surely be given weight on the matter.

Circumventing business standards, policy and practice can not be taken lightly.

Response 1: The Applicant and the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) has received a copy of this letter and has been made aware of your comments and concerns. This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 2: *I was not aware of any community related awareness or input in the news breaking of this venture. This solicitation for public input is the only means for community expression. There are living communities in the area; there are nearby schools and existing businesses - wouldn't they be affected by this project?*

Response 2: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 3: *Why hasn't there been any sharing of the overall plan for Kalaeloa's airport operation from the SOH DOT or its Airport's Division other than the statement of Million Air's interest in this operation site. Shouldn't the general public be informed of the "master plan"?*
- A subsequent article this past week described the plans of developers for new homes in this Kalaeloa community. At least this news was deemed worthy of explanation before implementation of action.

Response 3: The Kalaeloa Airport Master Plan was prepared in November 1998 and is a public document that can be requested from HDOT-A.

Comment 4: *Clearly an investment program of this magnitude and investment will have an affect on the environment, easements, effects to the current location infrastructure and climate, which are currently concerning topics of importance. There was no mention of a timetable to produce a study with the impact of the planned structures that Million Air has said they are committed to building in their news release. Isn't a environmental impact study a state requirement for a project of this magnitude?*

I am concerned as to the speed of this project. I will remain confident that the proper procedure will prevail. I am not opposed to new concepts or business competition.

Response 4: As discussed in the response to Comment #1, This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination.

With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: keola firmin <k.jfirmin@yahoo.com>
Sent: Monday, March 8, 2021 9:26 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Million Air- Kalaeloa airport fixed base operation and fuel farm facility

To whom it may concern,

I am a resident Hawaii and have some concerns regarding the proposed construction project and operation of a fix based operation and fuel farm facilities located at Kalaeloa Airport (JFR). Listed below some of my questions and concerns:

1. Have any controls been implemented to minimize the risk of a fuel spill into our groundwater systems? If so, what are they? If not, why not? How will Million Air mitigate the risk, and how will they manage spills from an ecological standpoint as well as a human one.

2. The draft EA estimates an increase of 10 times the amount of fuel currently stored at JRF. Is the intention to increase air traffic in the area? Has there been any consideration to how an increase if air traffic at JRF will affect property values of current and future housing developments in the area?

3. With the potential for increased 24-hour flight operations, has an FAA day-night average sound level (DNL) noise metric been utilized to determine the cumulative noise exposure for the JFR airport community?

4. What will Million Air do to manage new air traffic from the establishment of their business, and what will they do to ensure it minimizes the impact this will have on other businesses at the airport. How will they manage this given that the Tower at Kalaeloa is also a training facility so direction from the tower can be spotty. How will million air manage this?

5. Does Million Air plan to transport fuel over the road to replenish their large storage tanks? If not how will they achieve this? Does the current highway infrastructure leading to JFR support increased commercial traffic and how safe is it for the local populace in the surrounding area? How will Million Air mitigate any of these impacts to the roads, to the airport, and to the community at large?

6. The draft EA claims that the proposed project will have no significant impact on public health. Has Million Air conducted an Environmental Impact Assessment (EIA) to determine the effects on the environment to include the human factor? If they have not why haven't they, and do they intend to do so? How will the public, particularly local parties who will be impacted by the project be notified and involved in the process?

V/R

concerned Hawaii resident

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Keola Firmin
Email: k.jfirmin@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Firmin:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Have any controls been implemented to minimize the risk of a fuel spill into our groundwater systems? If so, what are they? If not, why not? How will Million Air mitigate the risk, and how will they manage spills from an ecological standpoint as well as a human one.*

Response 1: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 2: *The draft EA estimates an increase of 10 times the amount of fuel currently stored at JRF. Is the intention to increase air traffic in the area? Has there been any consideration to how an increase if air traffic at JRF will affect property values of current and future housing developments in the area?*

Response 2: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Regarding effects on property values of current housing developments, the project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 3: *With the potential for increased 24-hour flight operations, has an FAA day-night average sound level (DNL) noise metric been utilized to determine the cumulative noise exposure for the JFR airport community?*

Response 3: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Criteria established specifically for airport operations include the FAA's Federal Aviation Regulations (FAR), Part 150, *Recommendations for Land Use Compatibility in Yearly Day-Night Average Sound Levels (DNL),* and the HDOT-A, *Recommendations for Local Land Use Compatibility*. The FAA criteria suggest that sound levels lower than 65 DNL would be compatible with all land uses, while the State of Hawaii criteria suggest that sound levels lower than 60 DNL are compatible.

As stated in Section 3.8 (Noise) of the Draft EA:

> *The predominant source of noise at JRF is aircraft performing takeoff and landing operations. Noise levels range from over 80 DNL on and immediately adjacent to the runways, to 55 DNL approximately 8,000 feet from the sides of the runways (See Figure 3-7: Noise Contour Map). Several U.S. Navy housing and support facilities occur within the 60 DNL contour, which means the populations may be exposed to sound levels greater than 60 DNL.*
>
> *The JRF Master Plan shows that between aircraft flyby events, background ambient noise levels are typically less than 55 dBA. These levels may decrease to levels less than 40 dBA during calm wind periods at locations which are removed from motor vehicle traffic, surf noise, or developed areas.*

Section 3.8 of the Final EA has been updated to also state that flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and would be consistent with the character of the airport operations that currently existing in the immediate vicinity. Also, JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 4: *What will Million Air do to manage new air traffic from the establishment of their business, and what will they do to ensure it minimizes the impact this will have on other businesses at the airport. How will they manage this given that the Tower at Kalaeloa is also a training facility so direction from the tower can be spotty. How will million air manage this?*

Response 4: The project site is located within the existing Kalaeloa Airport (JRF). The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations. The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Comment 5: *Does Million Air plan to transport fuel over the road to replenish their large storage tanks? If not how will they achieve this? Does the current highway infrastructure leading to JFR support increased commercial traffic and how safe is it for the local populace in the surrounding area? How will Million Air mitigate any of these impacts to the roads, to the airport, and to the community at large?*

Response 5: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 6: *The draft EA claims that the proposed project will have no significant impact on public health. Has Million Air conducted an Environmental Impact Assessment (EIA) to determine the effects on the environment to include the human factor? If they have not why haven't they, and do they intend to do so? How will the public, particularly local parties who will be impacted by the project be notified and involved in the process?*

Response 6: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Keone Kaleikula-Kele <keone.kele@gmail.com>
Sent: Tuesday, March 9, 2021 11:25 AM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Attachments: EA Questions for Export_Wilson and Herman.docx

--
An Aviation Fact:

Airbus A340-541 = 4 Engines 4 Long Haul

Boeing B777-200LR = 2 Engines 4 Longer Haul

1. Because of it's size and location, should JRF fall under the axe and be de-commissioned by the FAA, State of Hawai'i and to a certain extent, the U.S. Government, should an future project including housing, shopping outlet(s) e.t.c. have any success due to the compromised environment who will be at fault for having John Rodgers Field succumb due to a lack of respect for the 'Aina and the history that this airport has played for many years?

2. Should a new pipeline be routed to JRF that will benefit both the current/existing and future FBO's for fuel supply or should the fuel supply be transported by road to JRF for the sale and use for any and all aircraft arriving into JRF? If so, what enterprise will "foot the bill" to do such?

3. Is Million Air increasing the air traffic into JRF by ten-fold, by doing this move, building a fuel storage facility to hold the amount of both Jet-A and Avgas also by ten-fold?

4. Throughout the two major seasons within Hawai'i, which consists of high heat and/or heavy winds and rain, should a fuel spill happen, while operating a Million Air refueling unit as an example, will it reach the ocean during a heavy downpour AND will Million Air have the proper fuel spill containment equipment and quickly will the fuel spill be contained before it reaches the storm drains?

5. After moving away from Honolulu to West O'ahu to get away from the Air Trafffic keeping me up late at night, How does Million Air plan to address the Noise Abatement during late-afternoon and into the late-night @ JRF? Or are they (Million Air) planning on bringing aircraft throughout the night into the early morning and keep neighboring subdivision awake all because they see money being more important than hard working people getting their well needed rest?

6. Will Million Air's complex be energy efficient and ecologically sound or will it be something of the past and rely on high amounts of electricity, water and waste services to make a profit for themselves while other business around and within JRF suffer? Why wasn't this draft addressed in the EA?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Keone Kaleikula-Kele
Email: keone.kele@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Kaleikula-Kele:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B. It should be noted that we received two emails with what appears to contain the same set of comments. As such, we did not reproduce the duplicate set of comments.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Because of it's size and location, should JRF fall under the axe and be de-commissioned by the FAA, State of Hawai'i and to a certain extent, the U.S. Government, should an future project including housing, shopping outlet(s) e.t.c. have any success due to the compromised environment who will be at fault for having John Rodgers Field succumb due to a lack of respect for the 'Aina and the history that this airport has played for many years?*

Response 1: With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 2: *Should a new pipeline be routed to JRF that will benefit both the current/existing and future FBO's for fuel supply or should the fuel supply be transported by road to JRF for the sale and use for any and all aircraft arriving into JRF? If so, what enterprise will "foot the bill" to do such?*

Response 2: Under the proposed action, the fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The

proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 3: *Is Million Air increasing the air traffic into JRF by ten-fold, by doing this move, building a fuel storage facility to hold the amount of both Jet-A and Avgas also by ten-fold?*

Response 3: As noted in Section 2.1 (Project Description) of the EA, early design and programming of the Fuel Farm facility anticipates that three (3) 30,000-gallon above-ground horizontal storage tanks will be constructed, with the remaining balance to follow in response to market demand. Storage of the fuel will help to minimize potential secondary impacts associated with fuel handling.

According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 4: *Throughout the two major seasons within Hawai'i, which consists of high heat and/or heavy winds and rain, should a fuel spill happen, while operating a Million Air refueling unit as an example, will it reach the ocean during a heavy downpour AND will Million Air have the proper fuel spill containment equipment and quickly will the fuel spill be contained before it reaches the storm drains?*

Response 4: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Also, the Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

Comment 5: *After moving away from Honolulu to West O'ahu to get away from the Air Trafffic keeping me up late at night, How does Million Air plan to address the Noise Abatement during late-afternoon and into the late-night @ JRF? Or are they (Million Air) planning on bringing aircraft throughout the night into the early morning and keep neighboring subdivision awake all because they see money being more important than hard working people getting their well needed rest?*

Response 5: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 6: *Will Million Air's complex be energy efficient and ecologically sound or will it be something of the past and rely on high amounts of electricity, water and waste services to make a profit for themselves while other business around and within JRF suffer? Why wasn't this draft addressed in the EA?*

Response 6: In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations. Also, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Lea Ann Kakimoto <lea.ann111@yahoo.com>
Sent: Tuesday, March 9, 2021 7:30 PM
To: Public Comment; herman.tuiolosega@hawaii.gov
Subject: Concerns regarding Million Air operating at Kalaeloa Airport

March 9, 2021

Dear Mr. Wilson Okamoto and Mr. Herman Tuiolosega

It has been brought to my attention that a new mainland company, Million Air, is trying to set up shop at Kalaeloa Airport. I have some concerns that I haven't found answers to. Would I be able to get answers to my questions?

1. Does that State's current infrastructure support the expansion at Kalaeloa?

2. How will this affect current businesses at that airport?

3. As you know, in Hawaii, community is very important. Did Million Air or anyone reach out to the surrounding communities to get input regarding this expansion. I've been asking community members and businesses in the surrounding areas and none have been notified or contacted.

4. The significant increase in fuel storage is another major concern to me. Since I am a teacher and there are schools in the vicinity, will it be safe for children in the surrounding schools? Will it affect the air quality?

5. What about increased traffic? Have the schools and communities in the surrounding areas been notified?

Mahalo,
Lea Ann Kakimoto

Sent from my iPhone

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Lea Ann Kakimoto
Email: lea.ann111@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Kakimoto:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Does that State's current infrastructure support the expansion at Kalaeloa?*

Response 1: Capacity of the utility infrastructure will be addressed during project design by the Applicant and relevant agencies and organizations. In general, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators according to the Kalaeloa Airport Master Plan.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 2: *How will this affect current businesses at that airport?*

Response 2: We note that the proposed action would occupy only a portion of the many lease lots developed and evaluated under HDOT's *Final Environmental Assessment/Finding of No Significant Impact for the Kalaeloa Airport Development Plan Improvements*. From a fundamental standpoint, market forces will dictate the viability of FBO operations at JRF, as is the case for virtually any form of commercial enterprise.

Comment 3: *As you know, in Hawaii, community is very important. Did Million Air or anyone reach out to the surrounding communities to get input regarding this expansion. I've been asking community members and businesses in the surrounding areas and none have been notified or contacted.*

Response 3: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 4: *The significant increase in fuel storage is another major concern to me. Since I am a teacher and there are schools in the vicinity, will it be safe for children in the surrounding schools? Will it affect the air quality?*

Response 4: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 5: *What about increased traffic? Have the schools and communities in the surrounding areas been notified?*

Response 5: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Publication of the Draft and Final EA documents in the Office of Environmental Quality Control's (OEQC) The Environmental Notice have been made in compliance with notification requirements set forth by HAR §11-200.1-19 and HAR §11-200.1-21.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: leahi ma <leahima@outlook.com>
Sent: Saturday, March 6, 2021 1:13 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Questions

To whom this may concern,

Are we safe from pollution?
Is our water supply safe?
Is our energy supply safe?
How Would You Describe Your Project?
What Are Your Goals and Objectives?
What are you trying to accomplish?
Who Will Benefit From Your Project?
Will You Be Creating Any Products?
Will You Be Providing Any Services?
What Methods Will You Use?
What Kind of Schedule Do You Anticipate?
Will your project or programme involve an incremental implementation process that might occur over many months or years? If so, what long-term phases are you anticipating?
Are there critical milestones within these phases?
Can you create a detailed schedule for near-term tasks you will be performing?
Will You Need Any Partners or Collaborators?
Many types of projects will benefit from teaming up with partners who can offer complementary strengths or a long-term track record in an important area. Do you anticipate joining forces with other organisations, consultants, or agencies to complete the project? If so, what experience, expertise, credibility, funding, or other benefits will each party bring to the table?
Will You Need Specific Information or Advice?
Do you plan to seek information and help from subject matter experts or other advisors?
Will you need to perform research, and if so, what sources will you tap?
Will You Need Special Systems or Equipment?
Will You Need to Use Special Tools or Templates?
How Will You Evaluate Project Success?
How will you measure the progress and effectiveness of your project?
Will you collect information on how you are carrying out your stated objectives (process evaluations), and how well you are serving the needs of your target audiences (outcome evaluations)?
Who Needs to Review and Approve Decisions?

Will there be a clear process for submitting items for review and approval, and a set timeframe for receiving comments back?
What protocol will be used?
How Might Your Project Evolve over Time?
Why should what happens in the future be so important today?
One reason is that implementing downstream opportunities can be hindered or helped by decisions that occur at the start. It's not unusual for a short-lived, "one-time only" effort to take on a life of its own by adding unexpected phases, variations, and versions - so why not plan ahead?
Who Will Be Responsible for What?
What Risks Should You Plan to Manage?
Nothing is more difficult that anticipating, flagging, and managing potential risks to a project as a whole, or to the successful completion of your part of it. After all, no one wants to admit potential failure, right?
What Open Issues Remain?

Sincerely,
Leahi

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Leahi Ma
Email: leahima@outlook.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Ma:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Are we safe from pollution?*
Is our water supply safe?
Is our energy supply safe?

Response 1: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Also, the Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations.

Comment 2: *How Would You Describe Your Project?*
What Are Your Goals and Objectives?
What are you trying to accomplish?
Who Will Benefit From Your Project?

Response 2: A description of the proposed action, as well as a narrative of the purpose and need for the proposed action is provided in Chapter 2 of the EA.

The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

As discussed in Section 3.12 (Socio-Economic Characteristics) of the Draft EA, the proposed action will provide many benefits for the community:

> *In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.*
>
> *In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.*

Combined with other past, present, and reasonably foreseeable future actions the proposed action would support the local economy and anticipated increased area population.

Comment 3: *Will You Be Creating Any Products?*
Will You Be Providing Any Services?
What Methods Will You Use?
What Kind of Schedule Do You Anticipate?

Response 3: Products and services provided by the proposed action would be those intended to facilitate, streamline, and improve the efficiency and commercial viability of GA, commercial, and military aircraft operations. Methods used would be consistent with methods currently used at JRF and as approved by the HDOT-A.

Airplanes take-off and land intermittently throughout the day upon receiving clearance from the air traffic control tower. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is currently projected that normal operations of the proposed action would be between 6:00 am and 6:00 pm.

Comment 4: *Will your project or programme involve an incremental implementation process that might occur over many months or years? If so, what long-term phases are you anticipating?*
Are there critical milestones within these phases?
Can you create a detailed schedule for near-term tasks you will be performing?

Response 4: As stated in Section 2.3 (Development Schedule) of the EA:

> *Following design and permitting, construction for the Fuel Farm facility is anticipated to commence sometime in Q2 2021, with the completion and turn-key operation targeted for Q3 2021. Construction of the FBO facility, by contrast, is anticipated to commence sometime in late 2021, following the conclusion of associated design and permitting.*

A detailed schedule for development, including critical milestones, is being developed in conjunction with the design phase of the proposed project.

Comment 5: *Will You Need Any Partners or Collaborators?*
Many types of projects will benefit from teaming up with partners who can offer complementary strengths or a long-term track record in an important area. Do you anticipate joining forces with other organisations, consultants, or agencies to complete the project? If so, what experience, expertise, credibility, funding, or other benefits will each party bring to the table?
Will You Need Specific Information or Advice?
Do you plan to seek information and help from subject matter experts or other advisors?
Will you need to perform research, and if so, what sources will you tap?
Will You Need Special Systems or Equipment?
Will You Need to Use Special Tools or Templates?
How Will You Evaluate Project Success?
How will you measure the progress and effectiveness of your project?
Will you collect information on how you are carrying out your stated objectives (process evaluations), and how well you are serving the needs of your target audiences (outcome evaluations)?
Who Needs to Review and Approve Decisions?

Response 5: The Applicant is in the process and will continue to address these questions throughout the design process in coordination with HDOT-A. Regardless of the outcome, no significant adverse impacts on the quality of the environment are anticipated as a result of implementation of the proposed action.

Comment 6: *Will there be a clear process for submitting items for review and approval, and a set timeframe for receiving comments back?*
What protocol will be used?

Response 6: The proposed action will be designed to ensure there is minimal impact to existing airport operations. HDOT-A will need to review and approve all project plans prior to construction. The review and approval process will be completed in accordance with standard HDOT-A procedures and protocol. Refer to the response to Comment #4 for the anticipated schedule for development.

Comment 7: *How Might Your Project Evolve over Time?*
Why should what happens in the future be so important today?
One reason is that implementing downstream opportunities can be hindered or helped by decisions that occur at the start. It's not unusual for a short-lived, "one-time only" effort to take on a life of its own by adding unexpected phases, variations, and versions - so why not plan ahead?
Who Will Be Responsible for What?
What Risks Should You Plan to Manage?
Nothing is more difficult that anticipating, flagging, and managing potential risks to a project as a whole, or to the successful completion of your part of it. After all, no one wants to admit potential failure, right?
What Open Issues Remain?

Response 7: The proposed Fuel Farm Facility is required to meet the EPA's SPCC requirements, including development of a SPCC Plan that must be updated every 5 years or anytime assets or operations change, per EPA guidelines. The SPCC Plan outlines measures to prevent, detect, and

contain spills or accidental releases. Additionally, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with EPA SPCC regulations to mitigate the risk of a release to the environment. Likewise, daily operational expired oil, fuels and other petroleum will be properly treated and managed.

Regarding the FBO, operations would continue to be managed into the future in accordance with HDOT-A and FAA rules, regulations, and guidelines.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: mahinaohoku <mahinaohoku@aol.com>
Sent: Wednesday, March 10, 2021 6:58 AM
To: Public Comment
Subject: EIS Barber's Point

Aloha,

I'd like to Thank you in advance for finally getting the opportunity to have a community voice.

I have a few questions that I am hoping will definitely be answered prior to any future decisions being made here at Barbers point...

Is it true that you are trying to use an EIS from 1999??

I'm not sure how you, are being responsible to the residents and especially the expectations and standards of the people and the Aina of Hawaii.

It seems very irresponsible and unprofessional especially since both schools were not even around when the original EIS was done...

So much has changed and to not be responsible and efficient to ensure the public is protected and the cultural needs to the Hawaiians are respected. There is no reasonable nor justifiable reason that due diligence should be ignored. I'm very concerned that the area businesses, schools and public have had no meetings for input from our community.

That someone whom doesn't live here nor works here on the island would be able to impact our daily lives from the mainland.

The perception of making exceptions for private companies to buy their way into doing business in the islands worries me. It seems as though there is a political n personal fast track going on here and that those actions are not above reproach. With no upfront and public transparency with debate and contributions best for the community with input from the community AFTER a current environmental impact statement. Allowing US to make good decisions based on clear, transparent precise up to date information going forward. We should not be flying by the seat of our pants assuming things from 20+ years ago has frozen in time at Barber's point.

Is it the current administration's business practice to ignore the procedures and process set forth regarding an EIS to protect the community and the Aina of the Kanaka Maoli and Kamaaina?

What harm is it to actually do the EIS first?? Do "WE" (the state n the locals) have some urgent life saving situation that makes it necessary to not adhere by and be transparent to the community by bypassing the need for a current EIS?

What safety issues are we hiding or not wanting the public to know about??

How are the businesses, schools and children going to be impacted? Their safety??

What is the rush and need for an exception?? Only someone not born n raised here would ask for an exception from the guidelines WE the people have agreed to do for the betterment of the community and the

people whom live and work in the area. That is a promise our leaders in government have promised us, transparency and the ability to protect our future by being able to have input.
Translating to the state doing its due diligence and doing an EIS, there should be no reason for an exception unless it would save lives. That should be the only reason an exception should be considered. If it does not directly save lives then there is no excuse for an exception to be made without public input and transparency of imminent need.

Excuses for not doing due diligence only satisfy the people making the excuses...
Never for the betterment of the whole vs self interests.

Any company or individual looking for an exception or fast track needs to pump their brakes n do right by the residents of Oahu. Only someone NOT from OUR island and OUR community would request this. As they are ignorant to how WE the people Love n care for OUR fellow neighbor n Aina..

I must remind you...
This is not the mainland, this is OUR home OUR island OUR community OUR keiki.
We need to stand up and demand better from our leaders.

With everything that has happened to OUR state with the Kealoha's, and the Fed's. WE need to be transparent and above reproach in ALL of OUR future dealings moving forward. No decisions should be made for political gain nor favor. Ugh Lobbyist = self gain

Once again I thank you for your time and wish you safety during these covid times...

Mahalo Nui Loa,

Mahina Silva

#Kanaka Maoli
#Oahu resident
#Concerned Wife
#Worried Parent
#Machinist

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Mahina Silva
Email: mahinaohoku@aol.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Silva:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Is it true that you are trying to use an EIS from 1999??*

I'm not sure how you, are being responsible to the residents and especially the expectations and standards of the people and the Aina of Hawaii.

It seems very irresponsible and unprofessional especially since both schools were not even around when the original EIS was done...

Response 1: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *So much has changed and to not be responsible and efficient to ensure the public is protected and the cultural needs to the Hawaiians are respected. There is no reasonable nor justifiable reason that due diligence should be ignored. I'm very concerned that the area businesses, schools and public have had no meetings for input from our community.*

That someone whom doesn't live here nor works here on the island would be able to impact our daily lives from the mainland.

The perception of making exceptions for private companies to buy their way into doing business in the islands worries me. It seems as though there is a political n personal fast track going on here and that those actions are not above reproach. With no upfront and public transparency with debate and contributions best for the community with input from the community AFTER a current environmental impact statement. Allowing US to make good decisions based on clear, transparent precise up to date information going forward. We should not be flying by the seat of our pants assuming things from 20+ years ago has frozen in time at Barber's point.

Is it the current administration's business practice to ignore the procedures and process set forth regarding an EIS to protect the community and the Aina of the Kanaka Maoli and Kamaaina?

What harm is it to actually do the EIS first?? Do "WE" (the state n the locals) have some urgent life saving situation that makes it necessary to not adhere by and be transparent to the community by bypassing the need for a current EIS?

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

As discussed in the response to Comment #1, this EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 3: *What safety issues are we hiding or not wanting the public to know about??*

How are the businesses, schools and children going to be impacted? Their safety??

Response 3: The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations

to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Comment 4: *What is the rush and need for an exception?? Only someone not born n raised here would ask for an exception from the guidelines WE the people have agreed to do for the betterment of the community and the people whom live and work in the area. That is a promise our leaders in government have promised us, transparency and the ability to protect our future by being able to have input.*

Translating to the state doing its due diligence and doing an EIS, there should be no reason for an exception unless it would save lives. That should be the only reason an exception should be considered. If it does not directly save lives then there is no excuse for an exception to be made without public input and transparency of imminent need.

Excuses for not doing due diligence only satisfy the people making the excuses...
Never for the betterment of the whole vs self interests.

Any company or individual looking for an exception or fast track needs to pump their brakes n do right by the residents of Oahu. Only someone NOT from OUR island and OUR community would request this. As they are ignorant to how WE the people Love n care for OUR fellow neighbor n Aina..

I must remind you...
This is not the mainland, this is OUR home OUR island OUR community OUR keiki.
We need to stand up and demand better from our leaders.

With everything that has happened to OUR state with the Kealoha's, and the Fed's. WE need to be transparent and above reproach in ALL of OUR future dealings moving forward. No decisions should be made for political gain nor favor. Ugh Lobbyist = self gain

Response 4: By copy of this letter, the Applicant and HDOT-A has been made aware of your comments and concerns. Please also refer to the response to #2 above.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Malisa Kaleikula-Kele <mahea1975@gmail.com>
Sent: Tuesday, March 9, 2021 7:58 PM
To: Public Comment
Subject: Questions that should be answered and considered

- An Environmental Impact Study on surrounding archeological sites in the area should be required to determine the extent of potential hazards, both natural and man-made. Does Million Air know that the culture within Hawai'i must be preserved culturally for our past, present and for our future, will they (Million Air) play nicely, do a full EIS or will they seek to ignore our local culture and try to work their way out of doing what's right by our community using their deep pockets to get HDOT-A and other individuals within the State of Hawai'i to help them?

- During a draft of an EA claims that the future proposed project will have significant to little or no impact on public health and damage. Does an FBO like Million Air care enough about our surrounding communities and existing businesses to do a complete and "thorough" study on public and environmental impacts in the EIS? Particularly since they did not bother to actually engage or even inform anyone in the local community at and around Kalaeloa of their proposed plans. How can they blame no impact in their EA without actually engaging and talking to the community?

- Renewable Energy is something the State of Hawai'i is looking towards, while working with the local businesses such as Hawaiian Electric and the two major petroleum refineries, Par Hawai'i and Island Energy, will Million Air take Hawaii's future energy plans into play, or will they "pay-off" un-named individuals to work around the future renewable energy plan for Hawai'i and make a "profit" for themselves and no one else, BUT themselves? How will Million Air adhere to the requirements of complete renewable energy usage by 2045 as laid out by the state? How will Million Air's proposed projects impact the local power infrastructure, and what if anything are they willing to do to mitigate and minimize those impacts?

- An EIS should be done prior to increasing the traffic into JRF by ten times the amount as stated within the EA, and in public comments made to the press, why isn't it being done as we speak? Given all the changes that have occurred at Kalaeloa since the last EIS was done over 20 years ago, and the massive changes that Million Air is attempting to make how can they state that there is no impact at the airport, particularly without undertaking a full survey and evaluation?

-Should a fuel farm 5 times larger than the existing one currently in operation at JRF, be safe to operate and kept under control, even at times under "lock and key" be safe to have next to an elementary school, a college-prep academy, a boys home, a youth challenge academy, a trade school and a high school taking into consideration the amount of fuel stored be safe for the surrounding schools and businesses? What will Million Air do to ensure the safety of everyone surrounding the fuel farm given its proximity to the road, the amount of people in close proximity to the airfield, and the minimal security at the airport?And why have none of these organizations been notified to inform them that someone wishes to store hundreds of thousands of gallons of fuel so close to them?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Malisa Kaleikula-Kele
Email: mahea1975@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Kaleikula-Kele:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *An Environmental Impact Study on surrounding archeological sites in the area should be required to determine the extent of potential hazards, both natural and man-made. Does Million Air know that the culture within Hawai'i must be preserved culturally for our past, present and for our future, will they (Million Air) play nicely, do a full EIS or will they seek to ignore our local culture and try to work their way out of doing what's right by our community using their deep pockets to get HDOT-A and other individuals within the State of Hawai'i to help them?*

Response 1: Section 1.4 of the EA, discusses previous environmental documentation at JRF that serves as a basis for the current assessment. As part of the U.S. Navy's 1999 Final Environmental Impact Statement (EIS), extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

We note that the current project site was included in the scope of the surveyed area, which at the time was already in use as an airport. Based on the findings of those previous studies, no archaeological sites were located at the project site or within JRF. Of the twelve historic structures identified as eligible for listing on the National Register of Historic Places (NRHP), only three of these structures, the Air Traffic Control Tower, Hangars 110 and 111 were located within JRF. These structures are not located in the immediate vicinity of the project site, and the proposed action will not involve any improvements to these structures.

In addition, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project. Since the project site assessed in the 2010 Final EA includes the

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

proposed Fixed Base Operation (FBO) site, there is reason to believe that a similar determination will be made for proposed FBO project.

Based on the foregoing information, it is reasonable to believe that the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity. As such, the Oahu Burial Council was not notified as part of the environmental review process, but that does not preclude them from being contacted in the future should it be necessary. Additionally, we note that Section 3.6 (Historic, Archaeological and Cultural Resources) of the Final EA has been updated to state:

> *The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If required, any studies or field inspections will be initiated, and the resulting report will be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.*

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *During a draft of an EA claims that the future proposed project will have significant to little or no impact on public health and damage. Does an FBO like Million Air care enough about our surrounding communities and existing businesses to do a complete and "thorough" study on public and environmental impacts in the EIS? Particularly since they did not bother to actually engage or even inform anyone in the local community at and around Kalaeloa of their proposed plans. How can they blame no impact in their EA without actually engaging and talking to the community?*

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could

serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

As discussed in the response to Comment #1, this EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 3: *Renewable Energy is something the State of Hawai'i is looking towards, while working with the local businesses such as Hawaiian Electric and the two major petroleum refineries, Par Hawai'i and Island Energy, will Million Air take Hawaii's future energy plans into play, or will they "pay-off" un-named individuals to work around the future renewable energy plan for Hawai'i and make a "profit" for themselves and no one else, BUT themselves? How will Million Air adhere to the requirements of complete renewable energy usage by 2045 as laid out by the state? How will Million Air's proposed projects impact the local power infrastructure, and what if anything are they willing to do to mitigate and minimize those impacts?*

Response 3: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations.

Comment 4: *An EIS should be done prior to increasing the traffic into JRF by ten times the amount as stated within the EA, and in public comments made to the press, why isn't it being done as we speak? Given all the changes that have occurred at Kalaeloa since the last EIS was done over 20 years ago, and the massive changes that Million Air is attempting to make how can they state that there is no impact at the airport, particularly without undertaking a full survey and evaluation?*

Response 4: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

As discussed in the response to Comment #1, this EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 5: *Should a fuel farm 5 times larger than the existing one currently in operation at JRF, be safe to operate and kept under control, even at times under "lock and key" be safe to have next to an elementary school, a college-prep academy, a boys home, a youth challenge academy, a trade school and a high school taking into consideration the amount of fuel stored be safe for the surrounding schools and businesses? What will Million Air do to ensure the safety of everyone surrounding the fuel farm given its proximity to the road, the amount of people in close proximity to the airfield, and the minimal security at the airport?And why have none of these organizations been notified to inform them that someone wishes to store hundreds of thousands of gallons of fuel so close to them?*

Response 5: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not

anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

During the early consultation phase as previously described, we note the State Department of Education (DOE) was notified about the publication of the Draft EA and the nearby school provided comments, which have been addressed and appended to the Final EA.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Marleen Serrao <mserrao@bpaviation.com>
Sent: Tuesday, March 9, 2021 3:28 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: EA Concerns

Aloha,

- Is the current infrastructure of Kalaeloa Airport enough to accommodate another FBO? Given that another FBO already exists at Barbers Point, what efforts have been undertaken to ensure that there is enough infrastructure, and need for multiple FBO's at this time, particularly given the current decline in aviation due to the pandemic.
- Why hasn't Barbers Point Aviation Services been consulted at any point during the process of developing or submitting this Environmental Assessment? As an existing business at Kalaeloa we will likely be impacted by the construction and existence of new business operations and facilities at the airport. How is it possible that there can be a finding of no impact without talking with us and everyone else that actually works at the airport or in the area around it?
- Will there be improvement with the security and perimeter of Kalaeloa Airport? And why has it not been addressed? Given the proximity of the proposed Fuel Farm location to Midway Rd, and the minimal amount of protection to the airport offered by a single fence, how is Million Air addressing the potential security risk of keeping so much fuel in a highly visible location at the edge of the airport?
- How is Million Air going to ensure that construction isn't going to impact our operations? We utilize airport facilities that are close to the proposed sites, so how will Million Air make sure that we still have safe access during the construction process?
- Following up on the last question, the pay pumps we use as a part of our business are right next to their proposed hangar site, once they are in operation, how is Million Air going to make sure that their own business operations won't impact our ability to safely get fuel?
- Why is the Master plan that is being used in this environmental assessment so old? Is there a more recent plan for the airport that this EA should use that incorporates all of the changes and development that has happened since it was created? If not, shouldn't there be one, and shouldn't that be utilized? If there isn't such a master plan, shouldn't this be held off until one is developed? Or at a minimum, shouldn't one be drafted and incorporated as a part of an EIS process for the new buildings, instead of using one that is over 20 years old?

Mahalo for your time,

--

Marleen K. Serrao
Administrative Assistant

(808) 518-4663 Office
91-1259 Midway Road, Bldg 104, Suite 1
Kapolei, HI 96707

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Marleen Serrao
Administrative Assistant
Barbers Point Aviation Services
91-1259 Midway Road, Building 104, Suite 1
Kapolei, Hawaii 96707
Email: mserrao@bpaviation.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Serrao:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Is the current infrastructure of Kalaeloa Airport enough to accommodate another FBO? Given that another FBO already exists at Barbers Point, what efforts have been undertaken to ensure that there is enough infrastructure, and need for multiple FBO's at this time, particularly given the current decline in aviation due to the pandemic.*

Response 1: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region. According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Capacity of utility infrastructure will be addressed during project design by the Applicant and relevant agencies and organizations.

We would also like to note that in consideration of the economic impacts brought on by the pandemic over the past year, the proposed action is likely to have a beneficial impact on the local economy as it would provide an alternative source of revenue to the State in the form of excise, individual, and corporate taxes.

In addition, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs. Nonetheless, from a fundamental standpoint, market forces will dictate the viability of FBO operations at JRF, as is the case for virtually any form of commercial enterprise.

Comment 2: *Why hasn't Barbers Point Aviation Services been consulted at any point during the process of developing or submitting this Environmental Assessment? As an existing business at Kalaeloa we will likely be impacted by the construction and existence of new business operations and facilities at the airport. How is it possible that there can be a finding of no impact without talking with us and everyone else that actually works at the airport or in the area around it?*

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association to the proposed action.

Comment 3: *Will there be improvement with the security and perimeter of Kalaeloa Airport? And why has it not been addressed? Given the proximity of the proposed Fuel Farm location to Midway Rd, and the minimal amount of protection to the airport offered by a single fence, how is Million Air addressing the potential security risk of keeping so much fuel in a highly visible location at the edge of the airport?*

Response 3: By copy of this letter, HDOT-A has been made aware of your concerns regarding security at Kalaeloa Airport. The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Comment 4: *How is Million Air going to ensure that construction isn't going to impact our operations? We utilize airport facilities that are close to the proposed sites, so how will Million Air make sure that we still have safe access during the construction process?*

Response 4: As noted in the response to Comment #3, the project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Comment 5: *Following up on the last question, the pay pumps we use as a part of our business are right next to their proposed hangar site, once they are in operation, how is Million Air going to make sure that their own business operations won't impact our ability to safely get fuel?*

Response 5: Refer to the response to Comment #4.

Comment 6: *Why is the Master plan that is being used in this environmental assessment so old? Is there a more recent plan for the airport that this EA should use that incorporates all of the changes and development that has happened since it was created? If not, shouldn't there be one, and shouldn't that be utilized? If there isn't such a master plan, shouldn't this be held off until one is developed? Or at a minimum, shouldn't one be drafted and incorporated as a part of an EIS process for the new buildings, instead of using one that is over 20 years old?*

Response 6: Both the 2006 and 1998 master plans are the latest versions of the respective plan documents. HDOT-A has been made aware of your concerns related to the age of the plans. As discussed in the response to Comment #1, the proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: melvin andres <melboyandres@yahoo.com>
Sent: Tuesday, March 9, 2021 6:19 PM
To: Public Comment
Subject: Kalaeloa airport operations

Aloha,
I've visited the Kalaeloa area on many occasions throughout my life and know of many sacred landmarks and burial sites in the area. I have a few questions in regard to the impact Million Air would have to airport operations at the Kalaeloa airport:

1. What would Million Air learn from an EIS to preserve these precious sites?
2. What would Million Air learn from the EIS to help prevent the airport operations from affecting the archeological sites in Kalaeloa?
3. The Super Ferry started in Hawaii but faced many issues when it avoided having an EIS properly done. Will Million Air promise the people of Hawaii to get an EIS done before doing business in the state?
4. Do airport operations have a long term impacts on respiratory health?
5. Will an EIS study help determine if airport operations contribute to increased cancer rates in surrounding communities? If not, what type of study would be helpful.
6. Will increasing fuel usage at Kalaeloa airport affect Hawaii's future goal of 100% renewable energy?
7. Does Million Air believe in climate change?
8. What impact does Million Air's proposed project have on climate change?

Thank for your time and consideration. Please get the EIS done for the sake of our children. Let's not make this mistake again.

Sincerely,
Melvin Andres

Sent from my iPhone

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Melvin Andres
Email: melboyandres@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Andres:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I've visited the Kalaeloa area on many occasions throughout my life and know of many sacred landmarks and burial sites in the area. I have a few questions in regard to the impact Million Air would have to airport operations at the Kalaeloa airport:*

1. What would Million Air learn from an EIS to preserve these precious sites?
2. What would Million Air learn from the EIS to help prevent the airport operations from affecting the archeological sites in Kalaeloa?

Response 1: Section 1.4 of the EA discusses previous environmental documentation at JRF that serves as a basis for the current assessment. As part of the U.S. Navy's 1999 Final Environmental Impact Statement (EIS), extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

We note that the current project site was included in the scope of the surveyed area, which at the time was already in use as an airport. Based on the findings of those previous studies, no archaeological sites were located at the project site or within JRF. Of the twelve historic structures identified as eligible for listing on the National Register of Historic Places (NRHP), only three of these structures, the Air Traffic Control Tower, Hangars 110 and 111 were located within JRF. These structures are not located in the immediate vicinity of the project site, and the proposed action will not involve any improvements to these structures.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

In addition, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project. Since the project site assessed in the 2010 Final EA includes the proposed Fixed Base Operation (FBO) site, there is reason to believe that a similar determination will be made for proposed FBO project.

Based on the foregoing information, it is reasonable to believe that the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity. As such, the Oahu Burial Council was not notified as part of the environmental review process, but that does not preclude them from being contacted in the future should it be necessary. Additionally, we note that Section 3.6 (Historic, Archaeological and Cultural Resources) of the Final EA has been updated to state:

> *The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If required, any studies or field inspections will be initiated, and the resulting report will be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.*

Comment 2: *The Super Ferry started in Hawaii but faced many issues when it avoided having an EIS properly done. Will Million Air promise the people of Hawaii to get an EIS done before doing business in the state?*

Response 2: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 3: *Do airport operations have a long term impacts on respiratory health?*

Response 3: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 4: *Will an EIS study help determine if airport operations contribute to increased cancer rates in surrounding communities? If not, what type of study would be helpful.*

Response 4: Your comment regarding the impact of airport operations on increase cancer rates surrounding communities is not within the scope of the EA. This type of study would be best undertaken at a national level or global level as there would be more data available at that level since there are airports that operate not only across the country, but across the world.

Comment 5: *Will increasing fuel usage at Kalaeloa airport affect Hawaii's future goal of 100% renewable energy?*

Response 5: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 6: *Does Million Air believe in climate change?*
What impact does Million Air's proposed project have on climate change?

Response 6: Airplanes rely primarily on the burning of fossil fuels for energy. Until alternative fuels or technology have been fully developed for general use or for widespread adoption, it is anticipated that airplanes will continue to rely primarily on the burning of fossil fuels for energy. As such, storage options are required to minimize the amount of fuel handling. We note that Section 3.1 (Climate & Climate Change) of the Draft EA include discussions related to potential climate change impacts. Specifically, Section 3.1 of the EA states:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*. We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Micah Sanchez <micah.sanchez5827@gmail.com>
Sent: Monday, March 8, 2021 6:40 PM
To: Public Comment; herman.tuiolosega@hawaii.gov
Subject: Million Air at Kalaeloa Airport and their EA Draft

Good Evening,

I am writing to you to bring up very alarming concerns that the Kapolei community has:

1) Airport environments emanate airborne synthetic compounds during aerial exercises that unequivocally cause terrible air quality. This affects both air terminal specialists and all communities living close to the airport. What are the drawn out effects of Million Air making a foothold here when there already is enough of a presence at Kalaeloa airport? For what reason are these issues not in the EA draft?

2) Studies show that air contamination can affect water quality and make corrosive downpour. How does the air contamination transmitted from the airport environment influence our day-to-day lives?

3) The draft EA does not address the conceivable corruption of water quality locally. How does Million Air intend to address the wellbeing of sea-fairing environments in the Kapolei community?

4) Airports harbor tremendous outflows of ozone depleting substances, which are intently attached to human air contamination, furthermore, is the fundamental driver of worldwide environmental change. How does Million Air intend to address the sway that ozone harming substances have on climate change?

5) Flights at Kalaeloa airport takeoff and land consistently day and night. How does the commotion of increased traffic in and out in any way, shape, or form positively impact the surrounding community.

Very Respectfully,

Micah Sanchez

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Micah Sanchez
Email: micah.sanchez5827@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Sanchez:

Thank you for your comments dated March 8, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Airport environments emanate airborne synthetic compounds during aerial exercises that unequivocally cause terrible air quality. This affects both air terminal specialists and all communities living close to the airport. What are the drawn out effects of Million Air making a foothold here when there already is enough of a presence at Kalaeloa airport? For what reason are these issues not in the EA draft?*

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 2: *Studies show that air contamination can affect water quality and make corrosive downpour. How does the air contamination transmitted from the airport environment influence our day-to-day lives?*

Response 2: Please refer to the response to Comment #1.

Comment 3: *The draft EA does not address the conceivable corruption of water quality locally. How does Million Air intend to address the wellbeing of sea-fairing environments in the Kapolei community?*

Response 3: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 4: *Airports harbor tremendous outflows of ozone depleting substances, which are intently attached to human air contamination, furthermore, is the fundamental driver of worldwide environmental change. How does Million Air intend to address the sway that ozone harming substances have on climate change?*

Response 4: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 5: *Flights at Kalaeloa airport takeoff and land consistently day and night. How does the commotion of increased traffic in and out in any way, shape, or form positively impact the surrounding community.*

Response 5: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity.

JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Michael Silva <mikesilva64@icloud.com>
Sent: Tuesday, March 9, 2021 10:53 AM
To: Public Comment

What about the EIS at barbers point airfield!!! What about the schools n other business in the area??????

Sent from my iPhone

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Michael Silva
Email: mikesilva64@icloud.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Silva:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *What about the EIS at barbers point airfield!!! What about the schools n other business in the area??????*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

We also note that the State Department of Education (DOE) was notified about the publication of the Draft EA and the nearby school provided comments, which have been addressed and appended to the Final EA.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Michelle Perry <mperry@bpaviation.com>
Sent: Saturday, March 6, 2021 11:38 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: EA Concerns

Aloha,

1. Barbers Point Aviation Services (BPAS) firmly believes that we will be affected by the project cited in The Environmental Notice on February 8, 2021. This as an obvious violation of Hawaii Administrative Rules (HAR) Chapter 11-200.1. Why wasn't BPAS consulted and how did Wilson Okamoto Corporation come to the conclusion of no significant impact without consulting any of the surrounding businesses?

2. JRF has experienced significant rain that caused pooling and flooding due to lack of permeable ground. The proposed expansion of Million Air's expansion will create concentrated runoff from the roof while greatly reducing permeable grounds at JRF by 40,000 square feet. The current Environmental Assessment (EA) does not fully address the environmental impact that the additional structures and diverted surface water will have on the surrounding areas.

3. There are significant pot holes on roads surrounding JRF. How will the increase in large transportation trucks and the aging infrastructure be addressed?

4. What is the HDOT-A's master plan for JRF?

6. Businesses on JRF has experienced regular power outages due to the aging infrastructure. How will Million Air's business structures affect the load on the power lines?

7. The last EIS for JRF was completed in 1999. The landscape and community has significantly changed since 1999. BPAS would like to request a complete EIS to account for the changes over the past 22 years to ensure that the concerns asked, but not limited to, in questions 1-6 are properly addressed.

Mahalo,
Michelle Perry

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Michelle Perry
mperry@bpaviation.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Perry:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Barbers Point Aviation Services (BPAS) firmly believes that we will be affected by the project cited in The Environmental Notice on February 8, 2021. This as an obvious violation of Hawaii Administrative Rules (HAR) Chapter 11-200.1. Why wasn't BPAS consulted and how did Wilson Okamoto Corporation come to the conclusion of no significant impact without consulting any of the surrounding businesses?*

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *JRF has experienced significant rain that caused pooling and flooding due to lack of permeable ground. The proposed expansion of Million Air's expansion will create concentrated runoff from the roof while greatly reducing permeable grounds at JRF by 40,000 square feet. The current Environmental Assessment (EA) does not fully address the environmental impact that the additional structures and diverted surface water will have on the surrounding areas.*

Response 2: The Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

Comment 3: *There are significant pot holes on roads surrounding JRF. How will the increase in large transportation trucks and the aging infrastructure be addressed?*

Response 3: The Applicant will continue to coordinate with the appropriate agencies during the design phase to determine whether any roadway improvements may be required.

Comment 4: *What is the HDOT-A's master plan for JRF?*

Response 4: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 5: *Businesses on JRF has experienced regular power outages due to the aging infrastructure. How will Million Air's business structures affect the load on the power lines?*

Response 5: In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations. Additionally, viable alternative energy sources will be considered for incorporation into the

proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 6: *The last EIS for JRF was completed in 1999. The landscape and community has significantly changed since 1999. BPAS would like to request a complete EIS to account for the changes over the past 22 years to ensure that the concerns asked, but not limited to, in questions 1-6 are properly addressed.*

Response 6: As discussed in the response to Comment #1, this EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: michelle perry <higamich@gmail.com>
Sent: Wednesday, March 10, 2021 11:53 AM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: Questions

1. How does this project affect natural resources in the Kalaeloa area?

2. Did Million Air consider how this project would affect native Hawaiian gathering rights?

3. Does Million Air have a plan to eliminate storm water emanating at the site?

4. How does the current storm drain plan account for the existing infrastructure around the proposed site to prevent flooding of surrounding properties?

5. Is there a plan to clear vegetation around any of the proposed sites?

6. Does Million Air plan to use silt fences during the construction of the proposed project? How will they be used?

7. How will the grading of the project affect construction?

8. How does the proposed plan account for heavy rains and the possible contamination from construction debris?

9. How will this project minimize the effect on the land?

10. How will this project minimize the effect on the sea?

11. How will this project minimize the effect on the air?

12. How will this project disrupt ocean quality?

13. How will this project affect surrounding wetlands?

14. How will the project disrupt migratory birds?

15. Did Million Air address the surrounding gulch and how construction will impact the area?

16. How does this project affect the watershed?

17. How will this project promote a resilient economy and positive social interaction?

18. How does this project improve the life for existing residents?

19. What steps will Million Air take to mitigate the damage done to the watershed?

20. How will Million Air address absorption of toxic compounds into the ground?

21. What are Million Air's best practices for construction?

22. What are Million Air's best practices for helping the surrounding community?

23. What are Million Air's best practices for preserving surround landscape?

24. How does Million Air plan to address the cultural heritage of our islands?

25. How does Million Air's vision tie into the vision of Hawaii?

26. What is Million Air's educational plan?

27. How does Million Air plan to address the surrounding heiaus?

28. How will the surrounding fish ponds be affected by the proposed project?

29. How does Million Air's construction practices address the beach community?

30. How does this project preserve mauka and makai views for the surrounding properties?

31. How does this project respect the cultural heritage of our islands?

32. How will the project preserve historic sites in original locations as part of a cultural landscape to preserve the story of Hawaii?

33. How will Million Air be able to feature and educate about historic site and artifacts using this proposed project?

34. How will this proposed project encourage ongoing cultural practices in the area?

35. What long term impacts does this project have on our fresh water resources?

36. What happens when a fuel leak gets into our groundwater?

37. How do gas emissions affect the ozone layer above our islands?

38. Is there a possibility that emissions could lead to acid rain and the contamination of our natural water resources? Is so, how does Million Air plan to address this concern?

39. Airports have may restrictions and regulations. How do they affect the surrounding environments?

40. The anthropogenic negative effects on the Earth's climate are one of the most important environmental issues the aviation industry has faced. How is Million Air going to address these negative effects?

41. Emissions from aircraft, both at ground level and at altitude, can give rise to numerous negative effects on air quality. How does this affect residents and environment in this area?

42. Emissions from aircraft, both at ground level and at altitude, can give rise to numerous negatives effects on climate. How does this affect climate change in the area?

43. Emissions from aircraft, both at ground level and at altitude, can give rise to numerous negative effects on ozone layer. Have studies been done to show how much impact it will have on the degradation of our ozone layer?

44. The gases and particles emitted from aircraft engines can cause harmful effects in different stages of the flight. How do these particles affect the health and safety of surrounding schools?

45. The gases and particles emitted from aircraft engines can cause harmful effects in different stages of the flight, what is the affect of particles from high altitudes falling onto our communities?

46. At ground level, where airports are involved, one of the adverse effects of aircraft emissions is degradation of the air quality, which may directly impact human health. How can Million Air state in the draft EA that there is no significant impact when surrounding businesses were not included in the consultation process?

47. According to the environmental reports and assessments, particulate matters, NOx, HC, SOx, and CO from aircraft engine emissions can affect air quality, health and welfare. Why should Million Air not have to do their due diligence and complete a full EIS?

48. Aviation-related emissions in the ground level and airport vicinities are not limited to aircraft emissions as ground support equipment also contribute to environmental harm. How is this issue being mitigated?

49. Land use by airports causes waste and ground congestion. How does Million Air plan to address this issue to allow other sectors in the community to prosper?

50. Airport emissions and waste have been shown to have impact on social life. Kapolei's redevelopment has seen significant growth and population expansion. What are the affects that this airport will have on social life and how will Million Air limit the impact?

51. Some airport activities such as fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction may result in the discharge of pollutants to adjacent water bodies and consequently trigger aquatic life and human health. Many community centers and single-family homes in the Kapolei area have pools; is Million Air concerned about the potential hazards that airport pollutions will have on swimming pools?

52. Some airport activities such as fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction may result in the discharge of pollutants to adjacent water bodies and consequently trigger aquatic life and human health. Due to the fact that the Kapolei community has open area and encourages outdoor activity, why did Million Air ignore the potential hazards on human life?

53. In Hawaii, community is extremely important to our culture. Why has Million Air failed to get community input?

54. What is the long term plan at the airport? Does DOTA have a master plan?

55. How does DOTA's master plan affect long term uses of the environment?

56. If the JRF airport would cease operations, what types of redevelopment projects could have success due to the compromised environment?

57. Hawaii is moving towards 100% renewable energy. Has Million Air taken Hawaii's future energy plans into consideration?

58. Hawaii would like to see 100% renewable energy in our transportation sector? How does increasing fuel usage affect our future goals?

59. Does Million Air believe in climate change?

60. What impact does Million Air's proposed project have on climate change?

61. Does the increase in fuel emissions in Kalaeloa have an impact on sea level rise?

62. Does Million Air support the Paris Climate Agreement?

63. What is the impact of airport operations on climate change?

64. Does JRF's current energy plan address 100% renewable energy by 2045?

65. Can Million Air achieve net-zero carbon emissions?

66. How does this project promote local commerce?

67. How will this project promote community service in the neighborhood?

68. Why does the draft EA fails to mention the potential environmental impacts on Kalaeloa Heritage Park?

69. What are the environmental impacts on Kalaeloa Heritage Park?

70. How will the potential impacts on Kalaeloa Heritage Park be mitigated?

71. Kalaeloa Heritage Park's mission statement is “Through partnership, planning, advocacy and stewardship, the Kupa'aina of Honouliuli accepts the kuleana to preserve and protect our kupuna, historical sites and mo'olelo of Kalaeloa. We are also committed to assuring that cultural traditions and practices of na ‘oiwi o Kalaeloa are perpetuated.” Why does the draft EA fail to recognize the organization as a potential partner when it is located in the vicinity of the proposed project?

72. What is the impact of jet fuel on natural resources?

73. What are the effects of toxic chemicals on our historical property?

74. The draft EA does not address the impacts on the surrounding landowners. Why does a mainland company get to determine if they want to work with the community members.

75. The draft EA only addresses the non-existence of archaeological sites within the airport. Does Million Air believe that they won't have any impact on surrounding archaeological sites?

76. How does Million Air know that archeological sites in the area will not be affected? A full EIS should be required to determine the extent of potential hazards.

77. What long term impact do airports have on public health?

78. How does fine particulate matter released by airport operations affect public health?

79. Do airports have long term impacts on respiratory health?

80. Do airport operations contribute to increased cancer rates in surrounding communities?

81. The draft EA claims that the proposed project will have no significant impact on public health. Does Million Air care enough about our local communities to do a complete study on public health impacts in a thorough EIS?

82. Is it safe for children to inhale toxic fumes being that the proposed fuel farm is in proximity?

83. How do fuel emissions affect cognitive learning of children?

84. How is the fuel transported to the large storage tanks?

85. Did Million Air consider how the increased traffic affects the safety of elementary school students?

86. How often will Million Air be testing air quality and what is the acceptable range for student exposure?

87. Population centers tend to move away from airports. Hoes does Million Air envision this project affecting the current Kalaeloa and Kapolei populations?

88. Does the State's current infrastructure support the expansion at JRF?

89. Will the increase in traffic through JRF cause a strain on existing public facilities at the airport?

90. How will a fuel spill affect surrounding communities?

91. How will the construction impact the current operations at JRF?

92. Does increase if air traffic at JRF cause property values to drop in the surrounding areas?

93. The draft EA estimates more than 10 times the amount of fuel being stored at JRF. Is Million Air trying to increase traffic 10 fold at JRF?

94. Shouldn't an EIS be done to study the full impact of increasing traffic 10 fold at JRF?

95. Is it safe to have an elementary school next to a fuel farm?

96. What impact does the development have on the Black-necked Stilt (*Himantopus mexicanus)?*

97. What impact does the development have on the Pacific Golden-Plover (*Pluvialis fulva)*

98. What impact does the development have on the ʻEwa hinahina (*Achyranthes splendens)*

99. What impact does the development have on the ʻAkoko (*Chamaesyce skottsbergii)*

100. Hawaii is home to over 400 endangered species. Why does this draft EA not recognize or address any of them?

101. Native Hawaiian snails?

102. Do emissions have any impact on house pets?

103. How does the drift of hazardous emissions affect Koolina and the tourists visiting on the west side of the island?

104. How did Million Air know about the proposed project before the NPA was published?

105. What is the impact of a fuel spill on our groundwater systems?

106. Is it possible for a fuel spill to reach the ocean with heavy rains?

107. How do emissions affect water qualify in swimming pools?

108. Studies show that airports emit an extremely complex emission source of airborne pollutants that can have a significant impact on the environment. How does Million Air plan to address the surrounding properties?

109. Airports emit several airborne chemicals during airport activities that may create significantly worse air quality and increase exposure level of both airport workers and general population living nearby the airports. What are the long term impacts of these exposures and why are they not addressed in the draft EA?

110. Studies show that air pollution can impact water quality and create acid rain. How does the air pollution emitted from airports affect human life?

111. The draft EA does not address the possible degradation of water quality in the community. How does Million Air plan to address the health of aquatic ecosystems in Hawaii?

112. Airports create emissions of greenhouse gases, which are closely tied to human air pollution, and are the main driver of global climate change. How does Million Air plan to address the impact that greenhouse gases have on climate change?

113. Flights land at all times of the day and night. How does the noise affect communities?

114. I moved to the westside to get away from the loud air traffic in Honolulu. How does Million Air plan to address the noise pollution during the night?

115. Climate change has changed the weather and its impact on our geographical location in the Pacific Ocean. The flood maps and tsunami zone drawings look like they were taken from the 1999 EIS. How does climate change affect the current flood possibilities?

116. The Pacific Ocean has experienced an increase in hurricanes and earthquakes. Being near the ocean, how does this impact JRF?

117. Does Million Air believe in climate change?

118. JRF is 33 feet above sea level. With the rapid exposure to sea level rise, JRF will be under water within the next few decades. How will Million Air mitigate sea level rise at JRF?

119. Hawaii has many migratory birds across the islands. How does airport activity affect estuaries and migratory paths?

120. There have been significant concerns about light pollution in Hawaii. How do jet and airport lights affect astronomy?

121. The Thirty Meter Telescope is being built on Mauna Kea. Have studies been done to prove that the bring airport lights will not impede on the success of the telescope?

122. Million Air's building plans look complex and appear to require large amounts of energy consumption. Why is this not addressed in the draft EA?

123. Did Million Air study the acceptable levels of greenhouse gas emissions?

124. How will greenhouse gases affect Hawaii in the next century?

125. Energy improvements have not been made to accommodate this new project. How will the increase in energy consumption affect the overall power grid in the area?

126. How will Million Air use traditional place names to name their buildings?

127. How does the project contribute to off-site cultural practices and programs?

128. How does Million Air plan to reflect historic style and design in the proposed architecture?

129. How does the proposed project relate to scale and mass of buildings in the surrounding areas?

130. How does this project promote a resilient economy and positive social interaction?

131. How will Million Air improve quality of life for existing residents?

132. How does this project promote local production?

133. How does Million Air plan to provide new opportunity for local owned and operated businesses?

134. How does Million Air plan to provide full-time jobs outside of the construction process?

135. Does aviation encourage the production of other local products?

136. How does this project set a foundation for cultural resources?

137. What are the main factors that will contribute to the downfall of the surrounding environment?

138. How does this project help to save our rain forest?

139. What is the threshold of impact that Million Air is considering when determining “No Significant Impact”?

140. What is the general criteria involved in determining “no significant impact”

141. Who gets to determine “no significant impact?”

142. Is the assessment of this EA technically sound? Who gets to determine that?

143. What steps did Million Air take to make sure the EA was technically sounds?

144. What types of environmental considerations are integrated into the overall project planning?

145. When and how does Million Air know when environmental mitigation measures are enough?

146. Has Million Air taken into consideration how this project will be socially accepted?

147. What types of public information was used in determining social acceptability?

148. How does the proposed project affect the micro-environment?

149. How does the proposed project affect the macro-environment?

150. What are the internal and external forces that affect Million Air's ability to create, communicate, deliver, and exchange value for the surrounding environment?

151. What has Million Air done to collect relevant data in developing this proposal? Does additional data need to be collected before breaking ground?

152. What are the natural hazards in the area that could affect the project?

153. What is the acceptable level of risk posed by natural hazards?

154. What did Million Air do in the scoping phase to determine acceptable levels of irreparable harm to the environment?

155. What was the governments role in fast tracking this project?

156. How was Million Air about to produce EA documents before the NPA was published?

157. How does Million Air plan to provide industrial symbiosis in the area?

158. How will the construction pollution affect the health and safety of surrounding schools?

159. Will this project lead to overpopulation to the area? What is Million Air's sudden interest in Hawaii?

160. What chemical compounds throughout the construction process cause harm to children?

161. What are acceptable levels of air pollution when dealing with surrounding schools and children?

162. Will the construction of the proposed project create potential water pollution problems that could affect the school?

163. What are the best practices for holding construction waste on the premises during the construction process? How will this affect the children?

164. Do construction hazardous materials lead to any potential health risks in children?

165. How does this project contribute to the loss of biodiversity in the surrounding regions?

166. Is there a threat of invasive species due to proposed construction?

167. How does Million Air plan to mitigate the possible threat of importing invasive species?

168. What is the effect of sub-standard construction air on children?

169. How will the construction debris affect the children when they are playing out in the playground?

170. Has Million Air studied how the buzz of microlights will affect the community? If so, how will this be addressed?

171. How does increased air travel affect the quality of life for the surrounding community?

172. Has Million Air systematically weighed the benefits between economy and environment? If so, what were the findings and who made these determinations?

173. How will this project affect biocapacity climate change?

174. What is the current carrying capacity for the Kalaeloa area?

175. How will Million mitigate the exploitation of local resources by a mainland company entering the market?

176. What is the proposed project’s industrial impact on global warming?

177. What is the potential land degradation impact that this project will have on surrounding properties?

178. What is the optimum population for JRF and how will increased air travel impact surrounding businesses?

179. Will the increased air traffic affect the population density in the surrounding communities?

180. Will the proposed project have an impact on population growth?

181. What is Million Air’s time table for the completion of the proposed project?

182. How does hazardous construction debris effect fertility rates in surrounding communities?

183. What is the impact of fuel emissions on fertility rates?

184. What is the environmental impact that the proposed project will have on surrounding reservoirs?

185. What is the proposed route to drain possible flood waters?

186. Does the current layout have an existing swale and how will the proposed building affect the path?

187. How will the increased air traffic affect wind energy projects on the island?

188. How will the proposed project increase light pollution?

189. How will Million Air mitigate point source pollution?

190. Will air pollution decrease indoor air quality in the surrounding buildings?

191. Will construction debris lead to possible corrosion of existing air travel by acid rain?

192. Does Million Air have a soil conservation plan?

193. How does Million Air plan to address soil conservation?

194. What are the byproducts of aviation and how does it affect soil contaminants?

195. Will the proposed project interfere with any of the surround business vantage points?

196. What is Million Air's plan to operate under COVID-19?

197. What are Million Air's future plans at JRF?

198. How does the proposed project affect ocean acidification?

199. How will a fuel spill affect nearshore ocean waters?

200. What are the affects of consumer capitalism on our community?

201. How does Million Air plan to conserve our environment for future generations?

202. What are the economic welfare impacts from the proposed project?

203. What are the social welfare impacts from the proposed project?

204. What has Million Air learned from Hawaii's cultural practices and how will these practices be implemented in business?

205. How will the project affect public health?

206. What further steps will Million Air have to take before breaking ground?

207. What is the rush of this project? Is there a specific deadline that must be met? Does that merit not doing a full EIS?

208. Will the workplace be free of recognized health and safety hazards? How will these workplace safety hazards be addressed?

209. Are there health and safety risks that may be anticipated and addressed based on knowledge or experience with similar worksites in the organization?

210. What are the mechanisms for reporting and responding to perceived health and safety threats? How effective are these mechanisms?

211. What are the mechanisms and channels for communicating about workplace health and safety? How effective are they?

212. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe potential site layout?

213. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe potential grounds and parking Lot?

214. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe potential noise level, lighting, ventilation, ergonomics, and safeguards for machines and equipment?

215. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe health and wellness?

216. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe signs?

217. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe computer and intranet

218. How did Million Air examine the types of physical factors supporting employee health in the EA process to observe accessibility for bikes/other forms of transportation?

219. How does the proposed project affect nearby community fitness facilities?

220. How does the proposed project affect nearby shower and changing room facilities?

221. How does the proposed project affect nearby Occupational Health Clinics?

222. How does Million Air plan to comply with Airport Deicing Effluent Guidelines?

223. Will Million Air need to apply for a NPDES permit?

224. How will the future of JRF interfere with urban planning?

225. How will the proposed project mitigate the possible segregation in the community?

226. How will the proposed project affect the demand for construction materials?

227. Greenhouse gas emissions are rising across the world. What is Million Air's acceptable contribution to green house gas emissions?

228. Could the airport expansion lead to carbon dioxide increases in our atmosphere?

229. What is the impact of engine testing on air quality?

230. Could this project lead to potential lead poisoning? How will it be mitigated?

231. Could this project lead to increased levels of carbon monoxide in the air?

232. What are the long term impacts of increased exposure to carbon monoxide?

233. Do airports emit silicon tetrafluoride? What are the long-term impacts of increased exposure to silicon tetrafluoride?

234. Do airport construction project involve using heavy metals? Is it possible for students in the area to get heavy metal poisoning?

235. What are the impacts of ash and dust from the construction site?

236. What are the impacts that construction has on asthma in children?

237. Will this project increase fossil fuel usage in Hawaii?

238. Does increased air traffic lead to global warming?

239. What is the anticipated use of water for the proposed project?

240. How will Million Air mitigate the decline in surrounding property values due to airport expansion?

241. How does Million Air plan to reduce its carbon footprint?

242. How will Million Air's operation be carbon neutral?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Michelle Perry
higamich@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Perry:

Thank you for your comments dated March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comments Pertaining to the Topics of Flora and Fauna:

1. *What impact does the development have on the Black-necked Stilt (Himantopus mexicanus)?*
2. *What impact does the development have on the Pacific Golden-Plover (Pluvialis fulva)*
3. *What impact does the development have on the 'Ewa hinahina (Achyranthes splendens)*
4. *What impact does the development have on the 'Akoko (Chamaesyce skottsbergii)*
5. *Hawaii is home to over 400 endangered species. Why does this draft EA not recognize or address any of them?*
6. *Native Hawaiian snails?*
7. *How will the project disrupt migratory birds?*
8. *Hawaii has many migratory birds across the islands. How does airport activity affect estuaries and migratory paths?*
9. *Is there a plan to clear vegetation around any of the proposed sites?*
10. *How does this project contribute to the loss of biodiversity in the surrounding regions?*
11. *Is there a threat of invasive species due to proposed construction?*
12. *How does Million Air plan to mitigate the possible threat of importing invasive species?*

Response: Potential adverse impacts on flora and fauna are not anticipated. The project site is located within a highly altered urban environment. The proposed FBO site consists of a concrete aircraft parking apron that has no vegetation and will not be suitable for faunal species habitat. The proposed Fuel Farm Facility site is currently undeveloped and partially vegetated and consists of common naturalized species found in ruderal areas around the State. No threatened or endangered faunal species are known to utilize the area for habitat or foraging. As such, no adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action. HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. Section 3.5.1 (Flora and Fauna) of the Final EA has been updated with the foregoing information.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Best Management Practices (BMPs) will be incorporated into the project plans and specifications that will minimize the spread of invasive species during construction. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

Comments Pertaining to the Topic of Soil:

1. *Does Million Air have a soil conservation plan?*
2. *How does Million Air plan to address soil conservation?*
3. *What are the byproducts of aviation and how does it affect soil contaminants*
4. *How will Million Air address absorption of toxic compounds into the ground?*
5. *How will this project minimize the effect on the land?*

Response: The Applicant is required to follow HDOT-A's Programmatic Environmental Hazard Evaluation and Environmental Hazard Management Plan (EHE-EHMP), which includes guidelines and requirements for testing and management of contaminated soils. The Applicant is creating a health and safety plan and will screen the site for contaminants during construction. Additionally, any soil stockpiles that will be removed off the construction lot will be analyzed per the State of Hawaii, Department of Health (DOH) regulations and properly disposed of depending on the compounds detected.

In addition, a NPDES permit for stormwater discharges related to project construction activities will be required as individual and/or cumulative soil disturbances at the project site will exceed one acre of land area. The permit requires a Stormwater Pollution Prevention Plan (SWPPP) to document the measures that will be taken to prevent stormwater runoff from construction activities. Prior to construction, preparation of an erosion control plan and installation of BMPs is also required and will be inspected by HDOT-A's third-party inspector to ensure that all BMPs measures are properly installed per the SWPPP and plan drawings, and that all required documentation and permits are in place prior to excavation activities. These BMPs will be inspected routinely construction and will be completely removed, once it is confirmed that the area is fully stabilized, after construction.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comments Pertaining to the Topic of Hydrology:

1. *What is the impact of a fuel spill on our groundwater systems?*
2. *Is it possible for a fuel spill to reach the ocean with heavy rains?*
3. *How do emissions affect water qualify in swimming pools?*
4. *The draft EA does not address the possible degradation of water quality in the community. How does Million Air plan to address the health of aquatic ecosystems in Hawaii?*
5. *Some airport activities such as fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction may result in the discharge of pollutants to adjacent water bodies and consequently trigger aquatic life and human health. Many community centers and single-family homes in the Kapolei area have pools; is Million Air concerned about the potential hazards that airport pollutions will have on swimming pools?*

6. *Some airport activities such as fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction may result in the discharge of pollutants to adjacent water bodies and consequently trigger aquatic life and human health. Due to the fact that the Kapolei community has open area and encourages outdoor activity, why did Million Air ignore the potential hazards on human life?*
7. *What is the environmental impact that the proposed project will have on surrounding reservoirs?*
8. *What is the proposed route to drain possible flood waters?*
9. *How does the proposed project affect ocean acidification?*
10. *How will a fuel spill affect nearshore ocean waters?*
11. *What is the anticipated use of water for the proposed project?*
12. *Does Million Air have a plan to eliminate storm water emanating at the site?*
13. *How does the current storm drain plan account for the existing infrastructure around the proposed site to*
14. *prevent flooding of surrounding properties?*
15. *How does the proposed plan account for heavy rains and the possible contamination from construction debris?*
16. *How will this project minimize the effect on the sea?*
17. *How will this project disrupt ocean quality?*
18. *How will this project affect surrounding wetlands?*
19. *Did Million Air address the surrounding gulch and how construction will impact the area?*
20. *How does this project affect the watershed?*
21. *What steps will Million Air take to mitigate the damage done to the watershed?*
22. *What long term impacts does this project have on our fresh water resources?*
23. *What happens when a fuel leak gets into our groundwater?*
24. *Is there a possibility that emissions could lead to acid rain and the contamination of our natural water resources? Is so, how does Million Air plan to address this concern?*
25. *Will the construction of the proposed project create potential water pollution problems that could affect the school?*
26. *How will a fuel spill affect surrounding communities?*
27. *Does the current layout have an existing swale and how will the proposed building affect the path?*

Response: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

The Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. The project site will be designed to direct stormwater runoff to an onsite detention basin, vegetated areas, and a series of grated drain inlets and underground pipes to an underground injection control drainage well for disposal. Use of underground injection wells are allowed at the airport, including at the project site, under the regulations of the DOH UIC program, which requires monthly inspections and maintenance, and reporting of any spills. Thus, development of the drainage systems for the proposed facilities will not create an adverse impact to aquifers and groundwater resources.

Comments Pertaining to the Topic of the Natural Hazards:

1. *What are the natural hazards in the area that could affect the project?*
2. *What is the acceptable level of risk posed by natural hazards?*
3. *Does the increase in fuel emissions in Kalaeloa have an impact on sea level rise?*
4. *JRF is 33 feet above sea level. With the rapid exposure to sea level rise, JRF will be under water within the next few decades. How will Million Air mitigate sea level rise at JRF?*
5. *The Pacific Ocean has experienced an increase in hurricanes and earthquakes. Being near the ocean, how does this impact JRF?*

Response: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Section 3.4.1 (Sea Level Rise) of the EA provides a project-related discussion on sea level rise. Specifically, Section 3.4.1 of the EA states:

The project site is not located within the 3.2-foot or 6-foot sea level rise exposure area (SLRXA) as depicted by the National Oceanic and Atmospheric Administration (NOAA) Sea Level Rise data (See Figure 3-4: Sea Level Rise Exposure Map). No short or long-term impacts on sea level rise are anticipated during construction or operation of the proposed project. The exact nature of how the sea level will rise and when is unknown. New information will continually be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to sea level rise.

Comments Pertaining to the Topic of Air Quality:

1. *Studies show that airports emit an extremely complex emission source of airborne pollutants that can have a significant impact on the environment. How does Million Air plan to address the surrounding properties?*
2. *Airports emit several airborne chemicals during airport activities that may create significantly worse air quality and increase exposure level of both airport workers and general population living nearby the airports. What are the long term impacts of these exposures and why are they not addressed in the draft EA?*
3. *Airports create emissions of greenhouse gases, which are closely tied to human air pollution, and are the main driver of global climate change. How does Million Air plan to address the impact that greenhouse gases have on climate change?*
4. *Studies show that air pollution can impact water quality and create acid rain. How does the air pollution emitted from airports affect human life?*
5. *Do emissions have any impact on house pets?*
6. *Did Million Air study the acceptable levels of greenhouse gas emissions?*
7. *How will greenhouse gases affect Hawaii in the next century?*
8. *How will Million Air improve quality of life for existing residents?*

9. *What are acceptable levels of air pollution when dealing with surrounding schools and children?*
10. *How will Million Air mitigate point source pollution?*
11. *Will air pollution decrease indoor air quality in the surrounding buildings?*
12. *How will this project minimize the effect on the air?*
13. *How do gas emissions affect the ozone layer above our islands?*
14. *Emissions from aircraft, both at ground level and at altitude, can give rise to numerous negative effects on air quality. How does this affect residents and environment in this area?*
15. *The gases and particles emitted from aircraft engines can cause harmful effects in different stages of the flight. How do these particles affect the health and safety of surrounding schools?*
16. *The gases and particles emitted from aircraft engines can cause harmful effects in different stages of the flight, what is the affect of particles from high altitudes falling onto our communities?*
17. *At ground level, where airports are involved, one of the adverse effects of aircraft emissions is degradation of the air quality, which may directly impact human health. How can Million Air state in the draft EA that there is no significant impact when surrounding businesses were not included in the consultation process?*
18. *According to the environmental reports and assessments, particulate matters, NOx, HC, SOx, and CO from aircraft engine emissions can affect air quality, health and welfare. Why should Million Air not have to do their due diligence and complete a full EIS?*
19. *Aviation-related emissions in the ground level and airport vicinities are not limited to aircraft emissions as ground support equipment also contribute to environmental harm. How is this issue being mitigated?*
20. *How does fine particulate matter released by airport operations affect public health?*
21. *Do airports have long term impacts on respiratory health?*
22. *How often will Million Air be testing air quality and what is the acceptable range for student exposure?*
23. *Is it safe for children to inhale toxic fumes being that the proposed fuel farm is in proximity?*
24. *How will the construction pollution affect the health and safety of surrounding schools?*
25. *What is the effect of sub-standard construction air on children?*

Response: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comments Pertaining to the Topic of Renewable Energy:

1. *Hawaii is moving towards 100% renewable energy. Has Million Air taken Hawaii's future energy plans into consideration?*
2. *Hawaii would like to see 100% renewable energy in our transportation sector? How does increasing fuel usage affect our future goals?*
3. *Does JRF's current energy plan address 100% renewable energy by 2045?*
4. *Can Million Air achieve net-zero carbon emissions?*
5. *How does Million Air plan to reduce its carbon footprint?*
6. *How will Million Air's operation be carbon neutral?*
7. *Will this project increase fossil fuel usage in Hawaii?*

Response: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100%

renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comments Pertaining to the Topics of Climate Change and Global Warming:

1. *Does Million Air believe in climate change?*
2. *What impact does Million Air's proposed project have on climate change?*
3. *Does Million Air support the Paris Climate Agreement?*
4. *What is the impact of airport operations on climate change?*
5. *Climate change has changed the weather and its impact on our geographical location in the Pacific Ocean. The flood maps and tsunami zone drawings look like they were taken from the 1999 EIS. How does climate change affect the current flood possibilities?*
6. *How will this project affect biocapacity climate change?*
7. *What is the proposed project's industrial impact on global warming?*
8. *Does increased air traffic lead to global warming?*
9. *Emissions from aircraft, both at ground level and at altitude, can give rise to numerous negatives effects on climate. How does this affect climate change in the area?*
10. *Emissions from aircraft, both at ground level and at altitude, can give rise to numerous negative effects on ozone layer. Have studies been done to show how much impact it will have on the degradation of our ozone layer?*
11. *The anthropogenic negative effects on the Earth's climate are one of the most important environmental issues the aviation industry has faced. How is Million Air going to address these negative effects?*

Response: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comments Pertaining to the Topic of Socio-Economic Impacts:

1. *How will Million Air mitigate the decline in surrounding property values due to airport expansion?*
2. *What are the affects of consumer capitalism on our community?*
3. *How does Million Air plan to conserve our environment for future generations?*
4. *What are the economic welfare impacts from the proposed project?*
5. *What are the social welfare impacts from the proposed project?*

6. *How will this project promote a resilient economy and positive social interaction?*
7. *How does this project improve the life for existing residents?*
8. *What are Million Air's best practices for helping the surrounding community?*
9. *How does this project promote local commerce?*
10. *How will this project promote community service in the neighborhood?*
11. *Does increase if air traffic at JRF cause property values to drop in the surrounding areas?*
12. *How does this project promote a resilient economy and positive social interaction?*
13. *How does Million Air plan to provide new opportunity for local owned and operated businesses?*
14. *How does Million Air plan to provide full-time jobs outside of the construction process?*
15. *Will this project lead to overpopulation to the area? What is Million Air's sudden interest in Hawaii?*
16. *How will Million mitigate the exploitation of local resources by a mainland company entering the market?*
17. *Will the increased air traffic affect the population density in the surrounding communities?*
18. *Will the proposed project have an impact on population growth?*
19. *How does increased air travel affect the quality of life for the surrounding community?*
20. *What is the potential land degradation impact that this project will have on surrounding properties?*
21. *What is the optimum population for JRF and how will increased air travel impact surrounding businesses?*
22. *How does this project promote local production?*
23. *Does aviation encourage the production of other local products?*
24. *How does Million Air plan to provide industrial symbiosis in the area?*

Response: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action. As discussed in Section 3.12 (Socio-Economic Characteristics) of the Draft EA, the proposed action will provide many benefits for the community:

> *In the short term, construction expenditures will have a beneficial impact on the local construction industry, and construction activities will benefit the community indirectly through the creation of jobs.*

In the long term, by supporting general aviation operations at JRF, the proposed action will drive business and expenditures towards direct product-centered and service-related expenditures. Implementation of the proposed action will result in potential secondary beneficial impacts by stimulating local business enterprises and increasing local employment. Combined increased business activities will result in increased state revenues in the form of excise, individual, and corporate taxes.

Combined with other past, present, and reasonably foreseeable future actions the proposed action would support the local economy and anticipated increased area population.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comments Pertaining to the Topic of Traffic:

1. *The draft EA estimates more than 10 times the amount of fuel being stored at JRF. Is Million Air trying to increase traffic 10 fold at JRF?*
2. *Shouldn't an EIS be done to study the full impact of increasing traffic 10 fold at JRF?*
3. *How is the fuel transported to the large storage tanks?*
4. *Did Million Air consider how the increased traffic affects the safety of elementary school students?*
5. *Will the increase in traffic through JRF cause a strain on existing public facilities at the airport?*

Response: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comments Pertaining to the Topics of Infrastructure and Utilities:

1. *Does the State's current infrastructure support the expansion at JRF?*
2. *Million Air's building plans look complex and appear to require large amounts of energy consumption. Why is this not addressed in the draft EA?*

3. *Energy improvements have not been made to accommodate this new project. How will the increase in energy consumption affect the overall power grid in the area?*
4. *How will the increased air traffic affect wind energy projects on the island?*

Response: In the short and long-term, the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area. Infrastructure capacity will be addressed during project design by the Applicant and relevant agencies and organizations.

As mentioned in the response to comments pertaining to socio-economic impacts, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators according to the Kalaeloa Airport Master Plan.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comments Pertaining to the Topic of Historic, Archaeological and Cultural Resources:

1. *In Hawaii, community is extremely important to our culture. Why has Million Air failed to get community input?*
2. *Why does the draft EA fails to mention the potential environmental impacts on Kalaeloa Heritage Park?*
3. *What are the environmental impacts on Kalaeloa Heritage Park?*
4. *How will the potential impacts on Kalaeloa Heritage Park be mitigated?*
5. *Kalaeloa Heritage Park's mission statement is "Through partnership, planning, advocacy and stewardship, the Kupa'aina of Honouliuli accepts the kuleana to preserve and protect our kupuna, historical sites and mo'olelo of Kalaeloa. We are also committed to assuring that cultural traditions and practices of na 'oiwi o Kalaeloa are perpetuated." Why does the draft EA fail to recognize the organization as a potential partner when it is located in the vicinity of the proposed project?*
6. *What are the effects of toxic chemicals on our historical property?*
7. *The draft EA only addresses the non-existence of archaeological sites within the airport. Does Million Air believe that they won't have any impact on surrounding archaeological sites?*
8. *How does Million Air know that archeological sites in the area will not be affected? A full EIS should be required to determine the extent of potential hazards.*
9. *How will Million Air use traditional place names to name their buildings?*
10. *How does the project contribute to off-site cultural practices and programs?*
11. *How does Million Air plan to reflect historic style and design in the proposed architecture?*
12. *How does this project set a foundation for cultural resources?*
13. *What has Million Air learned from Hawaii's cultural practices and how will these practices be implemented in business?*
14. *Did Million Air consider how this project would affect native Hawaiian gathering rights?*
15. *How does Million Air plan to address the cultural heritage of our islands?*
16. *How does Million Air's vision tie into the vision of Hawaii?*
17. *How does Million Air plan to address the surrounding heiaus?*
18. *How does this project respect the cultural heritage of our islands?*
19. *How will the project preserve historic sites in original locations as part of a cultural landscape to preserve the story of Hawaii?*
20. *How will Million Air be able to feature and educate about historic site and artifacts using this proposed project?*
21. *How will this proposed project encourage ongoing cultural practices in the area?*

Response: The Kalaeloa Heritage Park site is described on the Kalaeloa Heritage and Legacy Foundation website as a relatively undisturbed, 77-acre parcel with over 177 recorded cultural sites that consist of a heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park. No impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action.

In Section 1.4 of the EA, we discuss previous environmental documentation at JRF that serves as a basis for the current assessment. As part of the U.S. Navy's 1999 Final Environmental Impact Statement (EIS), extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

We note that the current project site was included in the scope of the surveyed area, which at the time was already in use as an airport. Based on the findings of those previous studies, no archaeological sites were located at the project site or within JRF. Of the twelve historic structures identified as eligible for listing on the National Register of Historic Places (NRHP), only three of these structures, the Air Traffic Control Tower, Hangars 110 and 111 were located within JRF. These structures are not located in the immediate vicinity of the project site, and the proposed action will not involve any improvements to these structures.

In addition, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project. Since the project site assessed in the 2010 Final EA includes the proposed Fixed Base Operation (FBO) site, there is reason to believe that a similar determination will be made for proposed FBO project.

Based on the foregoing information, it is reasonable to believe that the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity. As such, the Oahu Burial Council was not notified as part of the environmental review process, but that does not preclude them from being contacted in the future should it be necessary. Additionally, we note that Section 3.6 (Historic, Archaeological and Cultural Resources) of the Final EA has been updated to state:

> *The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If required, any studies or field inspections will be initiated, and the resulting report will be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.*

The project site has been used for aviation and aircraft-related uses for 90 years or more. During this period, public access to the project site was controlled by the U.S. Navy. Further, all uses and activities were restricted to military purposes. Current use of the project site is limited by HDOT-A as authorized by HRS, Chapter 262-4(a) and permitted by HAR, Chapter 19-17.1, Small Plane Hangar Units and Tie-Down Spaces at Public Airports. Access to the project site is controlled by the HDOT-A and by assurances made by HDOT-A on behalf of the State of Hawaii to the FAA. HDOT-A and FAA policies limit the project site to aviation activities. The project site will be in a secured area and access will be for

authorized personnel only; thus, traditional or cultural practices are not anticipated to be impacted by the implementation of the proposed action.

Comments Pertaining to the Topic of Public Services and Facilities:

1. *How will the surrounding fish ponds be affected by the proposed project?*
2. *How does Million Air's construction practices address the beach community?*
3. *Land use by airports causes waste and ground congestion. How does Million Air plan to address this issue to allow other sectors in the community to prosper?*
4. *Airport emissions and waste have been shown to have impact on social life. Kapolei's redevelopment has seen significant growth and population expansion. What are the affects that this airport will have on social life and how will Million Air limit the impact?*

Response: The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Regarding your comment on solid waste, no short or long-term significant impacts to municipal solid waste collection and disposal facilities are anticipated as a result of the construction and operation of the proposed project.

Short-term impacts are anticipated in the form of construction debris that will be generated requiring disposal. The construction contractor shall be responsible for the proper disposal of construction debris at a CCH-approved disposal site. In accordance with HAR, Chapter 11-58.1, Solid Waste Management Control. No secondary or cumulative impacts to solid waste facilities will occur from the implementation of the proposed action.

Please refer to the comments pertaining to topic of traffic in response to your comment regarding ground congestion.

Comments Pertaining to the Topic of Noise:

1. *Flights land at all times of the day and night. How does the noise affect communities?*
2. *I moved to the westside to get away from the loud air traffic in Honolulu. How does Million Air plan to address the noise pollution during the night?*

Response: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point

Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comments Pertaining to the Topic of Visual Resources:

1. *How does this project preserve mauka and makai views for the surrounding properties?*
2. *How will the proposed project increase light pollution?*
3. *Has Million Air studied how the buzz of microlights will affect the community? If so, how will this be addressed?*
4. *There have been significant concerns about light pollution in Hawaii. How do jet and airport lights affect astronomy?*
5. *The Thirty Meter Telescope is being built on Mauna Kea. Have studies been done to prove that the bring airport lights will not impede on the success of the telescope?*
6. *How does the proposed project relate to scale and mass of buildings in the surrounding areas?*
7. *What are Million Air's best practices for preserving surround landscape?*

Response: Section 3.11 of the EA includes a description of the existing visual character of the project site, the potential impacts of the proposed action on visual resources, and proposed mitigation measures. No significant impacts on visual resources are anticipated with implementation of the proposed action.

It should be noted that lights on aircraft and airports are provided for the safe operation of airports at night. The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

Comments Pertaining to the Topic of Natural Resources:

1. *How does this project affect natural resources in the Kalaeloa area?*
2. *What is the impact of jet fuel on natural resources?*
3. *How does this project help to save our rain forest?*

Response: Section 3.5 of the EA includes a discussion of the Natural Environment, including a description of the existing characteristics of the natural environment, the potential impacts of the proposed action on natural resources, and proposed mitigation measures.

Comments Pertaining to the Topic of Emissions and Public Health:

1. *What long term impact do airports have on public health?*
2. *Do airport operations contribute to increased cancer rates in surrounding communities?*
3. *The draft EA claims that the proposed project will have no significant impact on public health. Does Million Air care enough about our local communities to do a complete study on public health impacts in a thorough EIS?*
4. *What is the impact of fuel emissions on fertility rates?*
5. *How will the project affect public health?*
6. *Are there health and safety risks that may be anticipated and addressed based on knowledge or experience with similar worksites in the organization?*
7. *What are the mechanisms for reporting and responding to perceived health and safety threats? How effective are these mechanisms?*
8. *What is Million Air's plan to operate under COVID-19?*

9. *How does the drift of hazardous emissions affect Koolina and the tourists visiting on the west side of the island?*
10. *How do fuel emissions affect cognitive learning of children?*

Response: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comments Pertaining to the Topic of Impacts During Construction:

1. *What are Million Air's best practices for construction?*
2. *Does Million Air plan to use silt fences during the construction of the proposed project? How will they be used?*
3. *How will the grading of the project affect construction?*
4. *How will the construction impact the current operations at JRF?*
5. *What chemical compounds throughout the construction process cause harm to children?*
6. *What are the best practices for holding construction waste on the premises during the construction process? How will this affect the children?*
7. *Do construction hazardous materials lead to any potential health risks in children?*
8. *How will the construction debris affect the children when they are playing out in the playground?*
9. *How does hazardous construction debris effect fertility rates in surrounding communities?*
10. *Will construction debris lead to possible corrosion of existing air travel by acid rain?*
11. *Do airport construction project involve using heavy metals? Is it possible for students in the area to get heavy metal poisoning?*
12. *What are the impacts of ash and dust from the construction site?*
13. *What are the impacts that construction has on asthma in children?*

Response: The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

During construction the Applicant is required to follow HDOT-A's Programmatic Environmental Hazard Evaluation and Environmental Hazard Management Plan (EHE-EHMP), which includes guidelines and requirements for testing and management of contaminated soils. The Applicant is creating a health and safety plan and will screen the site for contaminants during construction. Additionally, any soil stockpiles that will be removed off the construction lot will be analyzed per the State of Hawaii, Department of Health (DOH) regulations and properly disposed of depending on the compounds detected.

Additionally, a NPDES permit for stormwater discharges related to project construction activities will be required as individual and/or cumulative soil disturbances at the project site will exceed one acre of land

area. The permit requires a Stormwater Pollution Prevention Plan (SWPPP) to document the measures that will be taken to prevent stormwater runoff from construction activities. Prior to construction, preparation of an erosion control plan and installation of BMPs is also required and will be inspected by HDOT-A's third-party inspector to ensure that all BMPs measures are properly installed per the SWPPP and plan drawings, and that all required documentation and permits are in place prior to excavation activities. These BMPs will be inspected routinely construction and will be completely removed, once it is confirmed that the area is fully stabilized, after construction.

Comments Pertaining to the Topic of the Surrounding Environment:

1. *Is it safe to have an elementary school next to a fuel farm?*
2. *Airports have may restrictions and regulations. How do they affect the surrounding environments?*
3. *Will the proposed project interfere with any of the surround business vantage points?*
4. *What are the main factors that will contribute to the downfall of the surrounding environment?*
5. *What is the current carrying capacity for the Kalaeloa area?*

Response: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Comments Pertaining to the Topic the Master plan:

1. *What is the long term plan at the airport? Does DOTA have a master plan?*
2. *How does DOTA's master plan affect long term uses of the environment?*
3. *If the JRF airport would cease operations, what types of redevelopment projects could have success due to the compromised environment?*
4. *Population centers tend to move away from airports. Hoes does Million Air envision this project affecting the current Kalaeloa and Kapolei populations?*
5. *What are Million Air's future plans at JRF?*

Response: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comments Pertaining to the Topic of Findings of No Significant Impact:

1. *What is the threshold of impact that Million Air is considering when determining "No Significant Impact"?*
2. *What is the general criteria involved in determining "no significant impact"*
3. *Who gets to determine "no significant impact?"*

Response: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comments Pertaining to the Topic of the Environmental Assessment:

1. *Is the assessment of this EA technically sound? Who gets to determine that?*
2. *What steps did Million Air take to make sure the EA was technically sounds?*
3. *What types of environmental considerations are integrated into the overall project planning?*
4. *When and how does Million Air know when environmental mitigation measures are enough?*
5. *Has Million Air taken into consideration how this project will be socially accepted?*
6. *What types of public information was used in determining social acceptability?*
7. *How does the proposed project affect the micro-environment?*
8. *How does the proposed project affect the macro-environment?*
9. *What are the internal and external forces that affect Million Air's ability to create, communicate, deliver, and exchange value for the surrounding environment?*
10. *What has Million Air done to collect relevant data in developing this proposal? Does additional data need to be collected before breaking ground?*
11. *What did Million Air do in the scoping phase to determine acceptable levels of irreparable harm to the environment?*
12. *What was the governments role in fast tracking this project?*
13. *How was Million Air about to produce EA documents before the NPA was published?*
14. *Has Million Air systematically weighed the benefits between economy and environment? If so, what were the findings and who made these determinations?*
15. *What further steps will Million Air have to take before breaking ground?*
16. *What is the rush of this project? Is there a specific deadline that must be met? Does that merit not doing a full EIS?*
17. *Will the workplace be free of recognized health and safety hazards? How will these workplace safety hazards be addressed?*
18. *The draft EA does not address the impacts on the surrounding landowners. Why does a mainland company get to determine if they want to work with the community members.*
19. *How did Million Air know about the proposed project before the NPA was published?*

Response: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined,

through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

As discussed previously, this EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comments Pertaining to the Topic of Project Schedule

1. What is Million Air's time table for the completion of the proposed project?

Response: As discussed in Section 2.3 (Development Schedule) of the EA, following design and permitting, construction for the Fuel Farm Facility is anticipated to commence sometime in Q2 2021, with the completion and turn-key operation targeted for Q3 2021. Construction of the FBO facility, by contrast, is anticipated to commence sometime in late 2021, following the conclusion of associated design and permitting.

Comments Pertaining to the Topic of Public Education

1. What is Million Air's educational plan?

Response: The Applicant will continue to coordinate with HDOT-A and has every intention to operate as a good neighbor to the surrounding community towards mutual collaboration on any relevant issues stemming from or in association with the proposed action. As the project progresses, the Applicant will look for opportunities to meet with the public and share more information about the project.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Nainoa Hopkins <nainoahopkins@yahoo.com>
Sent: Tuesday, March 9, 2021 12:54 PM
To: Public Comment
Subject: Million Air EA

1) How is Million Air going to ensure that construction isn't going to impact our operations? We utilize airport facilities that are close to the proposed sites, so how will Million Air make sure that we still have safe access during the construction process? Following up on the last question the pay pumps we use to fuel our airplanes are right next to their proposed hangar site, once they are in operation how is Million Air going to make sure that their own business operations won't impact our ability to safely get fuel?

2) In Hawaii, community is extremely important to our culture! Why has Million Air failed to get community input? How do they plan to provide any support to the locals and the culture of Hawaii?The draft EA does not address the impacts on the surrounding landowners. Why does a mainland company get to determine if they want to work with the community members? Why isn't anyone addressing the effect that they'll have on surrounding local businesses? Why did HDOTA waive the requirement of Million Air to send out notices for the draft EA given that during the prior EA exemption request, no organizations or individuals at or around Kalaeloa were notified?

3) How does Million Air know that archeological sites in the area will not be affected? A full EIS should be required to determine the extent of potential hazards?

4) Does the state's current infrastructure support the expansion at JRF? If Million Air plans to build their own infrastructure upon the current area. Will they be required to do soil test and other environmental testing to prove that the area is safe of contaminates? Will they be required to continue to do so to ensure that their efforts will not impact the environment down the road?

5) There are multiple local schools and community districts in the immediate vicinity of the airport. Is it safe to have a fuel farm so close to children and their families? Does water, noise and air pollution poise any potential short-term and/or long-term health risk to my friends and family?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Nainoa Hopkins
Email: nainoahopkins@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Hopkins:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How is Million Air going to ensure that construction isn't going to impact our operations? We utilize airport facilities that are close to the proposed sites, so how will Million Air make sure that we still have safe access during the construction process? Following up on the last question the pay pumps we use to fuel our airplanes are right next to their proposed hangar site, once they are in operation how is Million Air going to make sure that their own business operations won't impact our ability to safely get fuel?*

Response 1: The project site is located within the existing Kalaeloa Airport (JRF). The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations. The project site will be fenced in and there will be no construction impacts to adjacent properties and lease lots. Likewise, Million Air operations will not affect adjacent businesses and their operations.

Comment 2: *In Hawaii, community is extremely important to our culture! Why has Million Air failed to get community input? How do they plan to provide any support to the locals and the culture of Hawaii?The draft EA does not address the impacts on the surrounding landowners. Why does a mainland company get to determine if they want to work with the community members? Why isn't anyone addressing the effect that they'll have on surrounding local businesses? Why did HDOTA waive the requirement of Million Air to send out notices for the draft EA given that during the prior EA exemption request, no organizations or individuals at or around Kalaeloa were notified?*

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Kalaeloa Airport (JRF). The HDOT-A is the "Approving Agency" that evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 3: *How does Million Air know that archeological sites in the area will not be affected? A full EIS should be required to determine the extent of potential hazards?*

Response 3: In Section 1.4 of the EA, we discuss previous environmental documentation at JRF that serves as a basis for the current assessment. As part of the U.S. Navy's 1999 Final Environmental Impact Statement (EIS), extensive studies were undertaken to identify and document the archaeological resources and historic structures located on the 2,137 acres of surplus lands associated with the base closure. As stated in the 1999 Final EIS, no significant impacts on archaeological sites and historic structures will occur with the disposal of surplus lands, provided the transfer includes deed covenants that ensure appropriate treatment of those resources affected by proposed reuse. The State Historic Preservation Office concurred with the U.S. Navy's "no adverse effect" determination.

We note that the current project site was included in the scope of the surveyed area, which at the time was already in use as an airport. Based on the findings of those previous studies, no archaeological sites were located at the project site or within JRF. Of the twelve historic structures identified as eligible for listing on the National Register of Historic Places (NRHP), only three of these structures, the Air Traffic Control Tower, Hangars 110 and 111 were located within JRF. These structures are not located in the immediate vicinity of the project site, and the proposed action will not involve any improvements to these structures.

In addition, consultation with SHPD pursuant to Chapter 6E was undertaken in conjunction with the HDOT-A's 2010 Final EA. SHPD concurred with HDOT-A's determination that there will be "no effect" to historic resources for the proposed project. Since the project site assessed in the 2010 Final EA includes the proposed Fixed Base Operation (FBO) site, there is reason to believe that a similar determination will be made for proposed FBO project.

Based on the foregoing information, it is reasonable to believe that the proposed action will not adversely affect any archaeological resources or historic structures at the project site or in the immediate vicinity. As such, the Oahu Burial Council was not notified as part of the environmental review process, but that does not preclude them from being contacted in the future should it be necessary. Additionally, we note that Section 3.6 (Historic, Archaeological and Cultural Resources) of the Final EA has been updated to state:

> *The subject project will be subject to the State's historic preservation review requirements prescribed under HRS, Chapter 6E. Pursuant to Chapter 6E-42, the State Historic Preservation Division (SHPD) will have an opportunity to review and comment on the proposed action prior to its construction and operation. During the review process, SHPD could recommend an updated study or field inspection for the project be completed. If*

> *required, any studies or field inspections will be initiated, and the resulting report will be submitted to SHPD for review and approval prior to the start of construction. In addition, any recommended mitigation measures developed in consultation with SHPD will be incorporated into the project plans and specifications.*

Comment 4: *Does the state's current infrastructure support the expansion at JRF? If Million Air plans to build their own infrastructure upon the current area. Will they be required to do soil test and other environmental testing to prove that the area is safe of contaminates? Will they be required to continue to do so to ensure that their efforts will not impact the environment down the road?*

Response 4: Infrastructure capacity will be addressed during project design by the Applicant and relevant agencies and organizations.

The Applicant is required to follow HDOT-A's Programmatic Environmental Hazard Evaluation and Environmental Hazard Management Plan (EHE-EHMP), which includes guidelines and requirements for testing and management of contaminated soils. The Applicant is creating a health and safety plan and will screen the site for contaminants during construction. Additionally, any soil stockpiles that will be removed off the construction lot will be analyzed per the State of Hawaii, Department of Health (DOH) regulations and properly disposed of depending on the compounds detected. Section 3.9 (Hazardous Materials) of the EA has been updated with this information.

In the long-term, the proposed Fuel Farm Facility is required to meet the U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) requirements, including development of a SPCC Plan that must be updated every 5 years or anytime assets or operations change, per EPA guidelines. The SPCC Plan outlines measures to prevent, detect, and contain spills or accidental releases. Additionally, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with EPA SPCC regulations to mitigate the risk of a release to the environment. Likewise, daily operational expired oil, fuels and other petroleum will be properly treated and managed.

Comment 5: *There are multiple local schools and community districts in the immediate vicinity of the airport. Is it safe to have a fuel farm so close to children and their families? Does water, noise and air pollution poise any potential short-term and/or long-term health risk to my friends and family?*

Response 5: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Regarding water quality, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing

erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Regarding noise and proximity to schools, the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Regarding noise in general, flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently existing in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

It is also noted that consultation with HDOT-A is required for any proposed new developments or redevelopments within five (5) miles of an existing airport to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Nomen Nescio <nobody@dizum.com>
Sent: Saturday, March 6, 2021 3:50 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Question

Is it smart to put a fuel farm next to a school?

What is the appropriate age to be exposed to toxic fuel fumes?

How did the DOE let this happen?

Did Million Air talk with the Superintendent and the Board of Education to get this cleared?

How many kids need to be affected before the State takes this seriously?

Can jet fuel burn through skin?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Nomen Nescio
Email: nobody@dizum.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Nomen Nescio:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Is it smart to put a fuel farm next to a school?*
What is the appropriate age to be exposed to toxic fuel fumes?
How did the DOE let this happen?
Did Million Air talk with the Superintendent and the Board of Education to get this cleared?
How many kids need to be affected before the State takes this seriously?
Can jet fuel burn through skin?

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Regarding exposure to toxic fuel fumes, the proximity to schools, and effects on kids, the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School. The State

Department of Education (DOE) was notified about the publication of the Draft EA and the nearby school provided comments, which have been addressed and appended to the Final EA.

Regarding the effects of jet fuel on skin, jet fuel does not burn through skin on contact. Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Comment 2: *At what point does the public sentiment matter?*
Does the public have any say in what gets built on state land?
Did Million Air consult the public?
What government officials were involved in approving this project?

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the HDOT-A development plans for JRF. The HDOT-A is the "Approving Agency" that evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Paul Anderson <pander96707@gmail.com>
Sent: Saturday, March 6, 2021 11:38 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: herman.tuiolosega@hawaii.gov

To whom this may concern,

I am writing to express my concerns about the draft EA. I read that Million Air is trying to get exempted from doing a full EIS by saying there is no significant impact. As a resident in the community, I have many concerns that are not addressed. I hope that Million Air will do a complete EIS so that the community can see the real impacts of a 12 million dollar project on our community.

1. Why are the fuel tanks being located so close to a school with young children?

2. Is there a fuel source at the airport?

3. Is the plan to have planes land at all times of the night? Won't that affect the noise levels in our community?

4. How does a project this big get exempted from doing a full EIS?

5. What are the chances of the fuel tanks exploding with the hot temperatures?

6. Won't 380,000 gallons of fuel bring a lot more traffic to our community?

7. What is the purpose of expanding JRF when we have Daniel K Inouye? Does Million Air plan to smuggle drugs?

Paul

From: Paul Anderson <pander96707@gmail.com>
Sent: Monday, March 8, 2021 1:04 PM
To: Public Comment
Subject: Fwd: herman.tuiolosega@hawaii.gov

To whom this may concern,

I am writing to express my concerns about the draft EA. I read that Million Air is trying to get exempted from doing a full EIS by saying there is no significant impact. As a resident in the community, I have many concerns that are not addressed. I hope that Million Air will do a complete EIS so that the community can see the real impacts of a 12 million dollar project on our community.

1. Why are the fuel tanks being located so close to a school with young children?

2. Is there a fuel source at the airport?

3. Is the plan to have planes land at all times of the night? Won't that affect the noise levels in our community?

4. How does a project this big get exempted from doing a full EIS?

5. What are the chances of the fuel tanks exploding with the hot temperatures?

6. Won't 380,000 gallons of fuel bring a lot more traffic to our community?

7. What is the purpose of expanding JRF when we have Daniel K Inouye? Does Million Air plan to smuggle drugs?

Paul

From: Paul Anderson <pander96707@gmail.com>
Sent: Wednesday, March 10, 2021 11:28 PM
To: Public Comment
Cc: herman.tuiolosega@hawaii.gov
Subject: EA Questions

To whom this may concern,

The EA claiming no impact concerns me and I believe that more due diligence needs to be done before allowing this project to proceed?

Here are some peer reviewed articles that are concerning:

1. Pollution from Fossil-Fuel Combustion is the Leading Environmental Threat to Global Pediatric Health and Equity: Solutions Exist

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5800116/

The abstract states:
"Fossil-fuel combustion by-products are the world's most significant threat to children's health and future and are major contributors to global inequality and environmental injustice. The emissions include a myriad of toxic air pollutants and carbon dioxide (CO_2), which is the most important human-produced climate-altering greenhouse gas. Synergies between air pollution and climate change can magnify the harm to children. Impacts include impairment of cognitive and behavioral development, respiratory illness, and other chronic diseases—all of which may be "seeded" in utero and affect health and functioning immediately and over the life course. By impairing children's health, ability to learn, and potential to contribute to society, pollution and climate change cause children to become less resilient and the communities they live in to become less equitable. The developing fetus and young child are disproportionately affected by these exposures because of their immature defense mechanisms and rapid development, especially those in low- and middle-income countries where poverty and lack of resources compound the effects. No country is spared, however: even high-income countries, especially low-income communities and communities of color within them, are experiencing impacts of fossil fuel-related pollution, climate change and resultant widening inequality and environmental injustice. Global pediatric health is at a tipping point, with catastrophic consequences in the absence of bold action. Fortunately, technologies and interventions are at hand to reduce and prevent pollution and climate change, with large economic benefits documented or predicted. All cultures and communities share a concern for the health and well-being of present and future children: this shared value provides a politically powerful lever for action. The purpose of this commentary is to briefly review the data on the health impacts of fossil-fuel pollution, highlighting the neurodevelopmental impacts, and to briefly describe available means to achieve a low-carbon economy, and some examples of interventions that have benefited health and the economy."

2. How fossil fuel use threatens kids' health

https://www.sciencenewsforstudents.org/article/how-fossil-fuel-use-threatens-kids-health

The article states:
"The immune system helps defend the body against infections and poisons, such as toxic chemicals. But in infants and children, the immune system has not yet finished developing. This means that the body is not fully protected from impacts such as breathing irritating or toxic pollutants, Perera explains.

Not surprisingly, studies have shown that fossil-fuel pollutants, including hydrocarbon compounds, can impair health. They can even affect a child's brain.

"Air pollution is a risk factor for various developmental delays," Perera points out. By this she means that children exposed to this pollution may learn more slowly. They also may struggle to cope with stress. Pollution exposures may even lower a child's IQ or lead to attention deficit hyperactivity disorder. Taken together, these impacts can reduce a child's ability to learn and to do well in school, she says.

One thing that makes a child's brain so sensitive is that it is growing and changing rapidly. If a pollutant hits cells when it's time for them to morph into something new, they might not do so correctly. Or they might not change on time."

3. Fossil Fuel Air Pollution Kills One in Five People

https://www.nrdc.org/stories/fossil-fuel-air-pollution-kills-one-five-people

The article states:
"Scientists have known for years about the deadly impacts of fossil fuel combustion, but a new peer-reviewed study published in Environmental Research puts the global death toll at more than twice that of previous estimates. According to the research, exposure to fine particulate matter, or PM 2.5, from burning fossil fuels was responsible for about 8.7 million deaths globally in 2018. That's roughly the same number of people living in New York City or London. Or, to put this health crisis into further perspective, fossil fuel pollution is not only fueling the climate crisis but it also kills more people each year than HIV, tuberculosis, and malaria combined."

Questions:

1. Does Million Air believe in climate change and the harmful impact that fossil fuels can have on health?

2. After reading this articles, does Million Air still believe that this project will have no impact?

3. Did Million Air know that their are schools nearby?

4. Do these articles change Million Air's view point of no impact?

5. Does Million Air believe a 250,000 gallon fuel farm next to a school is a good idea?

I believe a full EIS should be completed before proceeding with this project.

Paul

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Paul Anderson
pander96707@gmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Anderson:

Thank you for your comments dated March 6, March 8, and March 10, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1 – Pertaining to the Topic of the Draft EA:
The EA claiming no impact concerns me and I believe that more due diligence needs to be done before allowing this project to proceed?

After reading this articles, does Million Air still believe that this project will have no impact?

How does a project this big get exempted from doing a full EIS?

Response 1: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2 – Pertaining to the Topic of Climate Change:
Does Million Air believe in climate change and the harmful impact that fossil fuels can have on health?

Response 2: Section 3.1 of the EA addresses climate and climate change. Specifically, Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 3 – Pertaining to the Fuel Farm Facility:
Did Million Air know that their are schools nearby?

Does Million Air believe a 250,000 gallon fuel farm next to a school is a good idea?

Why are the fuel tanks being located so close to a school with young children?

Is there a fuel source at the airport?

What are the chances of the fuel tanks exploding with the hot temperatures?

Won't 380,000 gallons of fuel bring a lot more traffic to our community?

Response 3: The project site is located within the existing Kalaeloa Airport (JRF), which is located near the American Renaissance Academy and also Barbers Point Elementary School.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

There is not presently a fuel source at the existing Kalaeloa Airport and fuel must be trucked in to support current aircraft operations. No significant increases in traffic volume are anticipated as a result of

implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. Fuel storage will also minimize the impacts of fuel handling. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 4 - Pertaining to the Topics of Noise*: Is the plan to have planes land at all times of the night? Won't that affect the noise levels in our community?*

Response 4: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. It is projected that normal operating hours of the proposed action will be between 6:00 am and 6:00 pm.

Comment 5 – Pertaining to the Topics of Purpose and Need: *What is the purpose of expanding JRF when we have Daniel K Inouye? Does Million Air plan to smuggle drugs?*

Response 5: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators.

The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Princess Ynoba <princessynoba@mail.com>
Sent: Saturday, March 6, 2021 1:24 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: Questions

1. What long term impact do airports have on public health?
2. How does fine particulate matter released by airport operations affect public health?
3. Do airports have long term impacts on respiratory health?
4. Do airport operations contribute to increased cancer rates in surrounding communities?
5. The draft EA claims that the proposed project will have no significant impact on public health. Does Million Air care enough about our local communities to do a complete study on public health impacts in a thorough EIS?
6. Is it safe for children to inhale toxic fumes being that the proposed fuel farm is in proximity?
7. How do fuel emissions affect cognitive learning of children?
8. How is the fuel transported to the large storage tanks?
9. Did Million Air consider how the increased traffic affects the safety of elementary school students?
10. How often will Million Air be testing air quality and what is the acceptable range for student exposure?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Princess Ynoba
Email: princessynoba@mail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Ynoba:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *What long term impact do airports have on public health?*

How does fine particulate matter released by airport operations affect public health?

Do airports have long term impacts on respiratory health?

Do airport operations contribute to increased cancer rates in surrounding communities?

The draft EA claims that the proposed project will have no significant impact on public health. Does Million Air care enough about our local communities to do a complete study on public health impacts in a thorough EIS?

Is it safe for children to inhale toxic fumes being that the proposed fuel farm is in proximity?

How do fuel emissions affect cognitive learning of children?

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Regarding public health, particulate matter release, respiratory health, cancer, toxic fumes, and emissions effect on children, the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is consulted before educational and medical facilities are developed. Accordingly, educational developments are restricted within specific distances from airports in order to reduce impact of noise and airport operations to schools. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations. All required permits and agency approvals, and reviews applicable to the proposed action are listed in Section 4.3 (Required Permits and Approvals) of the EA. As such, the proposed action is not anticipated to significantly impact any schools. The project is also not anticipated to obstruct or hinder access to nearby educational facilities, including the American Renaissance Academy and Barbers Point Elementary School.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Regi Perry <rperry@bpaviation.com>
Sent: Saturday, March 6, 2021 12:55 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiosolega@hawaii.gov <herman.tuiosolega@hawaii.gov>
Subject: Draft EA...

To whom it may concern:

My name is Reginald Perry and I am the owner of Barbers Point Aviation Services, LLC. and Barbers Point Flight School, LLC. I was not given the courtesy of providing input in September during Million Air's early consultation process. I am an impacted party per the EIS rules and the EA did not take that into consideration. Apparently it did not consider any of the business occupants and schools in the vicinity of Kalaeloa Airport either. To be very honest I was not even aware until very recently that a Draft EA was out for public comment. How or why we were not considered, in my option, is absurd.

With that said, I have a few questions regarding the Draft EA and the validity of findings going back to 1999. Mentioned were a TACAN, PAR and DME as being present on the airfield. If you are unaware, none of these exist and if it were not for modern GPS, none of the non-precision approaches at JRF airport would even be possible. It concerns me that if this part of the EA was accepted as truth, then what other considerations have not been acknowledged prior to now. Obviously, I have a real problem with DOT-A and what I believe to be fast tracking of Million Air onto the property. Here is a list of my valid concerns:

- As DOT-A should already know, electrical infrastructure in the area is beyond poor. If you ask any tenant or business in the area, you'll find that the power grid is already stressed to its limit Each time there are down pours and heavy rains, we lose power to our office space in Building 104 and we lose internet just as often. DOT-A has provided a back-up generator for over a year and this helps but it does not address the power losses on the ramp apron where we manage the States fuel facility and conduct our fueling for primarily military aircraft. The accompanying internet loss is very problematic for us as the fuel facilitity servers cannot gain online support and run customer charges and hence, the pay-at-the-pump service becomes inoperable and we are forced to shut it down. To say this happens ten plus times yearly or more would be accurate.

- Currently and for the ten years I have operated on the airfield, severe pooling and standing water occurs each and every time it rains. I am sure anyone in DOT-A will attest to this for sure as they have sent people out at least a few times over the years to survey. I have mentioned this to Mr. Sakata and pointed out that each year we have beeb required to conduct storm water refresher training and we comply but during the year absolutely nothing has been done about the pooling and drainage in the area near Midway Road.

- We have made four separate changes to our spill prevention plan (SPCC) since 2011. There is only one drywell in the area where all liquids would flow, as determined by our Environmental Engineering firm that stamps our revisions. We currently have secondary containments in an area where as of this week, our leases are being terminated. Liquids we

store for processing by Universal Solvents (Pearl City) are expired oil, fuel from daily required sumping and other petroleums. I am not sure how this could be a factor but have things like this been considered?

- The EA mentions a Master Plan. DOT-A has been telling us that a master plan was fourth coming. The DOT-A vacuum planning never included tenants or business tenants for input and as a result DOT-A had a previous plan in effect for Type 1, 2 and 3 lots on the apron where Million Air is planning to build. That unthought-out floor plan has never been been bid or gotten attention by any person or entity except my company in order to park our fuel trucks and for one other person that in the DOT-A's infinite wisdom, permitted a quora hangar to be erected for personal use central to an area that was supposed to be utilized by fully enclosed hangars and by commercial tenants. My question is whether or not there is a master plan other than the lot plan that was created specifically for Million Air? Again, the EA states an MP exists?

Regards,

Reginald Perry
President/CEO

C: +1 808.375.9244 (Primary)
P: +1 808.518-4662
F: +1 808.441-8139
rperry@bpaviation.com
bpaviation.com
barberspointflightschool.com

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Reginald Perry
President/CEO
Barbers Point Aviation Services
Email: rperry@bpaviation.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Perry:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *My name is Reginald Perry and I am the owner of Barbers Point Aviation Services, LLC. and Barbers Point Flight School, LLC. I was not given the courtesy of providing input in September during Million Air's early consultation process. I am an impacted party per the EIS rules and the EA did not take that into consideration. Apparently it did not consider any of the business occupants and schools in the vicinity of Kalaeloa Airport either. To be very honest I was not even aware until very recently that a Draft EA was out for public comment. How or why we were not considered, in my option, is absurd.*

With that said, I have a few questions regarding the Draft EA and the validity of findings going back to 1999. Mentioned were a TACAN, PAR and DME as being present on the airfield. If you are unaware, none of these exist and if it were not for modern GPS, none of the non-precision approaches at JRF airport would even be possible. It concerns me that if this part of the EA was accepted as truth, then what other considerations have not been acknowledged prior to now. Obviously, I have a real problem with DOT-A and what I believe to be fast tracking of Million Air onto the property. Here is a list of my valid concerns:

As DOT-A should already know, electrical infrastructure in the area is beyond poor. If you ask any tenant or business in the area, you'll find that the power grid is already stressed to its limit Each time there are down pours and heavy rains, we lose power to our office space in Building 104 and we lose internet just as often. DOT-A has provided a back-up generator for over a year and this helps but it does not address the power losses on the ramp apron where we manage the States fuel facility and conduct our fueling for primarily military aircraft. The accompanying internet loss is very problematic for us as the fuel facilitity servers cannot gain online support and run customer charges and hence, the payat-the-pump service becomes inoperable and we are forced to shut it down. To say this happens ten plus times yearly or more would be accurate.

Response 1: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

We note that the section on navigation aids in the EA was provided for informational purposes and is not relevant to the proposed action. As such, this section has been updated and the HDOT-A has been informed of your concerns about navigational aids on the airfield.

Electrical infrastructure will be addressed during project design and construction by the Applicant and relevant agencies and organizations. Also, Section 3.14.4 of the Final EA has been updated with the foregoing information and clarifies that the proposed action is not anticipated to significantly impact or increase overall demand on electrical and communication systems in the area.

Comment 2: *Currently and for the ten years I have operated on the airfield, severe pooling and standing water occurs each and every time it rains. I am sure anyone in DOT-A will attest to this for sure as they have sent people out at least a few times over the years to survey. I have mentioned this to Mr. Sakata and pointed out that each year we have beeb required to conduct storm water refresher training and we comply but during the year absolutely nothing has been done about the pooling and drainage in the area near Midway Road.*

Response 2: The Applicant has been required to assess stormwater flow and discharges from their facility to meet HDOT-A stormwater requirements and prevent flooding. The facility plans include the installation of stormwater drainage infrastructure to manage the increase in stormwater runoff from impermeable surfaces. Section 3.14.3 of the EA has been updated with this information.

Comment 3: *We have made four separate changes to our spill prevention plan (SPCC) since 2011. There is only one drywell in the area where all liquids would flow, as determined by our Environmental Engineering firm that stamps our revisions. We currently have secondary containments in an area where as of this week, our leases are being terminated. Liquids we store for processing by Universal Solvents (Pearl City) are expired oil, fuel from daily required sumping and other petroleums. I am not sure how this could be a factor but have things like this been considered?*

Response 3: The proposed Fuel Farm Facility is required to meet the U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) requirements, including development of a SPCC Plan that must be updated every 5 years or anytime assets or operations change, per EPA guidelines. The SPCC Plan outlines measures to prevent, detect, and contain spills or accidental releases. Additionally, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with EPA SPCC regulations to mitigate the risk of a release to the environment. Likewise, daily operational expired oil, fuels and other petroleum will be properly treated and managed.

Comment 4: *The EA mentions a Master Plan. DOT-A has been telling us that a master plan was fourth coming. The DOT-A vacuum planning never included tenants or business tenants for input and as a result DOT-A had a previous plan in effect for Type 1, 2 and 3 lots on the apron where Million Air is planning to build. That unthought-out floor plan has never been been bid or gotten attention by any person or entity except my company in order to park our fuel trucks and for one other person that in the DOT-A's infinite wisdom, permitted a quora hangar to be erected for personal use central to an area that was supposed to*

be utilized by fully enclosed hangars and by commercial tenants. My question is whether or not there is a master plan other than the lot plan that was created specifically for Million Air? Again, the EA states an MP exists?

Response 4: HDOT-A's Airport Layout Plan designates the project site for aviation use. The proposed action is an aviation-related use, consistent with the HDOT-A mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*. We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: sharonmiller95 <sharonmiller95@protonmail.com>
Sent: Saturday, March 6, 2021 3:02 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: EA Questions

To who this may concern,

This is not a matter that should not be taken lightly. The long term environmental effects on our communities should matter to everywhere looking to bring their business to the islands.

Here are some questions that I have regarding the EA done by Million Air

- Who is Million Air working with in Hawaii to make this project happen?
- Were the local businesses in the area consulted about this project?
- Do the schools in the area know that large amounts of fuel will be stored close to their property?
- The EA says no environmental concerns. There has to be something that could be of potential concern. All projects have impact on the community
- Were any native Hawaiians consulted?
- How will this project affect global warming?
- Sea level rise is a major concern since we are an island. Do fuel emissions contribute to sea level rise?
- Hawaii has experienced significant coral bleaching from sunscreen and human activity. Is fuel safe for our coral reefs?
- Has Million Air taken into consideration that native bats that are going extinct?
- Bats see windmills as water signatures and crash into them. Could this project have any impact on bat take?
- Does emissions affect the quality of agriculture?

Mahalo
Sharon

Sent with ProtonMail Secure Email.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Ms. Sharon Miller
Email: sharonmiller95@protonmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Ms. Miller:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *This is not a matter that should not be taken lightly. The long term environmental effects on our communities should matter to everywhere looking to bring their business to the islands.*
Here are some questions that I have regarding the EA done by Million Air

Who is Million Air working with in Hawaii to make this project happen?

Response 1: Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu, is the "Applicant" for this EA. The State of Hawaii, Department of Transportation, Airports Division (HDOT-A), is the "Approving Agency" that evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Comment 2: *Were the local businesses in the area consulted about this project?*

Do the schools in the area know that large amounts of fuel will be stored close to their property?

Were any native Hawaiians consulted?

Response 2: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the HDOT-A development plans for Kalaeloa Airport (JRF). As mentioned in the response to Comment #1 above, HDOT-A is the "Approving Agency" that evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

During the early consultation phase as previously described, we note that the Office of Hawaiian Affairs was consulted regarding the project and provided comments, which have been addressed and appended to the Final EA. In addition, the State Department of Education (DOE) was notified about the publication of the Draft EA and the nearby school provided comments, which have been addressed and appended to the Final EA.

Comment 3: *The EA says no environmental concerns. There has to be something that could be of potential concern. All projects have impact on the community.*

Response 3: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. There is always a slight environmental concern with all projects as it is difficult to prevent all impacts. However, measures have been incorporated into the design to mitigate environmental risk to the maximum extent practicable. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules. Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for the determination of no significant impact.

Comment 4: *How will this project affect global warming?*

Response 4: Section 3.1 of the EA addresses climate and climate change. The topic of global warming falls under this broader realm, and Section 3.1 states:

> *…there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic (human) sources.*

Section 3.1 goes on to further state:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

No significant impacts on climate are anticipated with implementation of the proposed action. The project will be appropriately designed in the context of the surrounding environment and will not affect temperatures, wind, or rainfall levels in the region.

Comment 5: *Sea level rise is a major concern since we are an island. Do fuel emissions contribute to sea level rise?*

Hawaii has experienced significant coral bleaching from sunscreen and human activity. Is fuel safe for our coral reefs?

Response 5: Section 3.4.1 (Sea Level Rise) of the EA provides a project-related discussion on sea level rise. Specifically, Section 3.4.1 of the EA states:

> *The project site is not located within the 3.2-foot or 6-foot sea level rise exposure area (SLRXA) as depicted by the National Oceanic and Atmospheric Administration (NOAA) Sea Level Rise data (See Figure 3-4: Sea Level Rise Exposure Map). No short or long-term impacts on sea level rise are anticipated during construction or operation of the proposed project. The exact nature of how the sea level will rise and when is unknown. New information will continually be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to sea level rise.*

The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 6: *Has Million Air taken into consideration that native bats that are going extinct?*

Bats see windmills as water signatures and crash into them. Could this project have any impact on bat take?

Response 6: No adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action. HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No Hawaiian hoary bats were encountered during the 12-month study. Section 3.5.1 (Flora and Fauna) of the Final EA has been updated with the foregoing information.

In addition, we note that the proposed Fixed-Base Operation (FBO) site is located on a pre-disturbed developed area, while the proposed Fuel Farm Facility site is situated on disturbed vacant land within the JRF property. There are no tall trees present within the project site and the proposed action will have no effect on tall trees located offsite that may be used by used by the Hawaiian hoary bat for habitat or foraging.

Comment 7: *Does emissions affect the quality of agriculture?*

Response 7: The project site is located in a highly altered urban environment. This area has been subject to intense anthropogenic activity over the past century. Thus, the proposed action will be of no impact to the quality of agriculture.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Vincent Perry <kealohav22@yahoo.com>
Sent: Tuesday, March 9, 2021 3:42 PM
To: Public Comment; herman.tuiolosega@hawaii.gov
Subject: Environmental Impact

Aloha,

It is my understanding that Million Air is planning to build a big facility to house their jet fuel, I just had a couple of questions in regards to the environmental impact this may pose on the people of Hawaii, as well as its impact on the environment. Mahalo

1. Due to how close JRF is located to a body of water, does Million Air have a plan to stop pollutants from entering the ocean?

2. In the event that there is some kind of accident, and fuel, oil, or any other contaminants enter the ocean do they have a plan to reduce the damage it can cause to the reefs, and natural ecosystems?

3. What is does the state want to do with JRF? and does Million Air's business practice line up with the goals the state of Hawaii has for the airport?

4. Due to the culture in Hawaii, and how proud people are to be from Hawaii, has Million Air reached out to any community to get their opinion on a 380,000 fuel facility?

5. Will Million Air be frequently testing their fuel tanks? If so, how often? In the event that they do find something that can potentially effect the environment in a negative what is their plan to mitigate the damage done to the environment?

6. With Million Air planning to come to JRF and build their fuel facility to conduct business much land are they trying to occupy? Are they looking to give back to the surrounding communities?

7. Due to the size of the proposed fuel facility, what short term, and long term effects does the building of this fuel farm have on the environment? do fuel farms emmit hazardous toxins? If so, how can we the people be sure we are not effected?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Mr. Vincent Perry
Email: kealohav22@yahoo.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Mr. Perry:

Thank you for your comments dated March 9, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *It is my understanding that Million Air is planning to build a big facility to house their jet fuel, I just had a couple of questions in regards to the environmental impact this may pose on the people of Hawaii, as well as its impact on the environment. Mahalo.*

1. Due to how close JRF is located to a body of water, does Million Air have a plan to stop pollutants from entering the ocean?

2. In the event that there is some kind of accident, and fuel, oil, or any other contaminants enter the ocean do they have a plan to reduce the damage it can cause to the reefs, and natural ecosystems?

Response 1: The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 2: *3. What is does the state want to do with JRF? and does Million Air's business practice line up with the goals the state of Hawaii has for the airport?*

Response 2: The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Comment 3: *4. Due to the culture in Hawaii, and how proud people are to be from Hawaii, has Million Air reached out to any community to get their opinion on a 380,000 fuel facility?*

Response 3: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the HDOT-A development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Comment 4: *5. Will Million Air be frequently testing their fuel tanks? If so, how often? In the event that they do find something that can potentially effect the environment in a negative what is their plan to mitigate the damage done to the environment?*

Response 4: The proposed Fuel Farm Facility is required to meet the EPA's SPCC requirements, including development of a SPCC Plan that must be updated every 5 years or anytime assets or operations change, per EPA guidelines. The SPCC Plan outlines measures to prevent, detect, and contain spills or accidental releases. Additionally, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with EPA SPCC regulations to mitigate the risk of a release to the environment. Likewise, daily operational expired oil, fuels and other petroleum will be properly treated and managed.

Comment 5: *6. With Million Air planning to come to JRF and build their fuel facility to conduct business much land are they trying to occupy? Are they looking to give back to the surrounding communities?*

Response 5: The project site is comprised of two (2) adjacent lots within JRF that encompass a total area of approximately 263,589 square feet (SF), or 6.05 acres. The Fixed Base Operation (FBO) site encompasses approximately 180,774 SF, or 4.15 acres, while the Fuel Farm Facility site encompasses

approximately 82,815 SF or 1.90 acres. The FBO is envisioned as a pre-engineered metal and glass building measuring approximately 50 feet high, 310 feet long, and 140 feet wide with approximately 40,000 SF of programmable space for general aviation use. An associated parking area with approximately 100 stalls will also be provided. The Fuel Farm Facility will consist of up to eight (8) 30,000-gallon Jet A Fuel above-ground, horizontal storage tanks with associated access stairs and catwalks, and will also accommodate one (1) 15,000-gallon Aviation gas (Avgas) tank, two (2) 500-gallon diesel tanks, and two (2) 500-gallon tanks used by various motor vehicles (mogas).

The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

Comment 6: *7. Due to the size of the proposed fuel facility, what short term, and long term effects does the building of this fuel farm have on the environment? do fuel farms emmit hazardous toxins? If so, how can we the people be sure we are not effected?*

Response 6: A full description of existing environment, impacts, and mitigation measures is provided in Chapter 3 of the EA. In this chapter, potential impacts in both the short and long-term are analyzed and mitigation measures are provided. In addition, the project is required to comply with all applicable City, State, and Federal rules and regulations.

Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former Barbers Point Naval Air Station (BPNAS) was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: mail.zip2.in Anonymous Remailer <nobody@mail.zip2.in>
Sent: Saturday, March 6, 2021 3:05 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Public Comment

Have there been studies done on the impact this will have on monk seals?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 1
Email: nobody@mail.zip2.in

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Have there been studies done on the impact this will have on monk seals?*

Response 1: According to the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service website, Hawaiian monk seals are found throughout the entire Hawaiian archipelago. The majority of Hawaiian monk seals (about 1,100 individuals) live in the Northwestern Hawaiian Islands, and a much smaller population live in the main Hawaiian Islands (about 300). Monk seals live in warm, subtropical waters and spend two-thirds of their time at sea. They use the waters surrounding atolls and islands and areas farther offshore on reefs and submerged banks; they also use deep water coral beds as foraging habitat. When on land, monk seals breed and haul-out to rest, give birth, and molt on sand, corals, and volcanic rock shorelines. They prefer sandy, protected beaches surrounded by shallow waters for pupping.

The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control

measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: hawaiinei <hawaiinei@protonmail.com>
Sent: Saturday, March 6, 2021 3:08 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: Questions

How will the lights from the airplanes flying at night affect the beautiful skies of Hawaii?

How will the green gas emissions from the airplanes affect our aina?

How much green gas emissions will be coming from all fo the planes?

What time of day will the airplanes be landing? Will they be flying at night or after midnight?

What happens if there's a fuel spill from the tanks?

Who has reached out to the surrounding communities to discuss our concerns?

Sent with ProtonMail Secure Email.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 2
Email: hawaiinei@protonmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How will the lights from the airplanes flying at night affect the beautiful skies of Hawaii?*

Response 1: Lights on airplanes flying at night are required for the purpose of aviation safety. The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

Comment 2: *How will the green gas emissions from the airplanes affect our aina?*
How much green gas emissions will be coming from all fo the planes?

Response 2: Section 3.1 of the EA states that:

> *Implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. However, these activities will be temporary and the quantities of GHGs released will be negligible. In the long-term, the FBO and Fuel Farm facilities support GA activities that have associated GHG emissions. It is noted that these activities are consistent with the current and planned use of the site and will not involve any new uses that add to or significantly impact State emissions inventories.*

Comment 3: *What time of day will the airplanes be landing? Will they be flying at night or after midnight?*

Response 3: Airplanes take-off and land intermittently throughout the day upon receiving clearance from the air traffic control tower. JRF flight operations typically occur between the hours of 6:00 am and 10:00 pm. Normal operating hours of the proposed action are projected to be between 6:00 am and 6:00 pm.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 4: *What happens if there's a fuel spill from the tanks?*

Response 4: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Comment 5: *Who has reached out to the surrounding communities to discuss our concerns?*

Response 5: The primary purpose of this EA is to assess and publicly disclose the potential environmental impacts of the proposed action. This EA serves to inform the community and solicit public input on the project. The proposed action supports general aviation activities and is consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) development plans for JRF. As the "Approving Agency" for the proposed action, HDOT-A evaluates the sum of effects of the proposed action on the quality of the environment before making a determination of significance based on criteria established by Hawaii Revised Statutes and administrative rules.

Prior to this EA, it was anticipated that the proposed action could be exempted from preparing an EA pursuant to HAR §11-200.1-15. On September 30, 2020, early consultation was conducted to obtain input from other agencies and stakeholders with jurisdiction or expertise on the exemption in accordance with HAR §11-200.1-17(b). A range of written responses to this inquiry were received and responded to and are appended to this EA. However, upon further review of the project details, HDOT-A determined, through its judgment and experience that the project was not eligible for an exemption and required the Applicant to prepare this EA. HDOT-A determined that the previously conducted consultation effort could serve to fulfill the early consultation requirements for this subject EA pursuant to HAR §11-200.1-18(a). In addition, the Applicant presented the project details in a meeting of the Ewa Neighborhood Board on the evening of April 8, 2021.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: mail.zip2.in Anonymous Remailer <nobody@mail.zip2.in>
Sent: Saturday, March 6, 2021 3:15 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Questions

Fuel is not a renewable energy source. Shouldn't Million Air be looking into electric planes instead of installing 250,000 gallons of fuel storage?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 3
Email: nobody@mail.zip2.in

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Fuel is not a renewable energy source. Shouldn't Million Air be looking into electric planes instead of installing 250,000 gallons of fuel storage?*

Response 1: We acknowledge your comment and note that the Fuel Farm facility is intended to serve existing and future general aviation (GA) demands along with both commercial and military aircraft operations. Electric airplanes are a relatively new technology, which has not yet been fully developed for general use or for widespread adoption. Airplanes rely primarily on the burning of fossil fuels for energy, and as such require storage options to minimize the amount of fuel handling.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

From: mail.zip2.in Anonymous Remailer <nobody@mail.zip2.in>
Sent: Saturday, March 6, 2021 3:15 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Questions

Will the sea turtles get affected if there is a plan crash over the ocean?

How is Million Air going to adapt to Hawaii's 100% renewable laws?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 4
Email: nobody@mail.zip2.in

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Will the sea turtles get affected if there is a plan crash over the ocean?*

Response 1: As discussed in Chapter 2 of the Draft EA and Final EA, the proposed action involves construction of a Fixed Base Operation (FBO) and Fuel Farm Facility within the existing Kalaeloa Airport (JRF). The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control." No adverse effects on sea turtles are anticipated as a result of the proposed action.

Comment 2: *How is Million Air going to adapt to Hawaii's 100% renewable laws?*

Response 2: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: mail.zip2.in Anonymous Remailer <nobody@mail.zip2.in>
Sent: Saturday, March 6, 2021 3:15 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Questions

How will plovers be affected from the increased air traffic? Will they end up migrating off the islands?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 5
Email: nobody@mail.zip2.in

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How will plovers be affected from the increased air traffic? Will they end up migrating off islands?*

Response 1: As noted in Section 3.5.1 (Flora and Fauna) of the Draft EA, it is possible that migratory species, such as the Pacific Golden Plover and Wandering Tattler, may appear at the project site, as the species regularly occur in other open coastal areas of Oahu. However, none of these species is a listed or candidate threatened, or endangered species as set forth by the U.S. Fish and Wildlife Service (USFWS). In addition, the proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). No adverse effects to plovers are anticipated as a result of the implementation of the proposed action.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

From: foxxyred <foxxyred@protonmail.com>
Sent: Saturday, March 6, 2021 4:15 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: EA Questions

How many Hawaii residents will this new company employ?

How will the fuel be delivered to the large fuel tanks?

Will the increased traffic affect the safety of the children at the nearby schools?

Has a study been done to determine the effects of airplane emissions to children?

Has a study been done to determine the effects of toxic fuel emissions to children?

Can a fuel spill reach the ocean?

Sent with ProtonMail Secure Email.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 6
Email: foxxyred@protonmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How many Hawaii residents will this new company employ?*

Response 1: It is projected that the proposed FBO would operate between the hours of 6:00 am to 6:00 pm. Based on that projection, it is estimated that about 15 employees would be needed for the FBO. The Applicant intends to hire all employees locally with one possible exception. That is if a qualified, experienced General Manager cannot be hired, then the Applicant would go beyond Oahu, beginning with the other Hawaiian Islands before resorting to the mainland for recruiting.

Comment 2: *How will the fuel be delivered to the large fuel tanks?*

Response 2: The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL.

Comment 3: *Will the increased traffic affect the safety of the children at the nearby schools?*

Response 3: Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Comment 4: *Has a study been done to determine the effects of airplane emissions to children? Has a study been done to determine the effects of toxic fuel emissions to children?*

Response 4: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 5: *Can a fuel spill reach the ocean?*

Response 5: The project site is located approximately one (1) mile north of Nimitz Beach and the Pacific Ocean. There will be no pollutants entering the ocean from the proposed action. Coastal waters south of the project site are classified as Class A Open Marine waters by the State of Hawaii, Department of Health (DOH). Class A waters "shall not act as receiving waters for any discharge which has not received the best degree of treatment or control."

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*. We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: baballs <baballs@protonmail.com>
Sent: Saturday, March 6, 2021 4:41 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: Answer Please

Aircraft emissions like NOx, HC, SOx and Co can affect air quality, health and welfare. Why ins't a complete EIS being done for the large scope of Millionair's project?

Gentry will start building new homes near the airport. How will Millionair's build affect the property value of Gentry's new project?

How will Millionair align with Hawaii's goal of being 100% renewable energy?

JRf is located in a rural area of Oahu. What study been done to determine that endangered species will not be threatened by this huge constructions project?

What impact will the aircraft/fuel emissions have on endangered species?

Sent with ProtonMail Secure Email.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 7
Email: baballs@protonmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Aircraft emissions like NO_x, HC, SO_x, and Co can affect air quality, health and welfare. Why isn't a complete EIS being done for the large scope of Millionair's project.*

Response 1: This EA has been prepared pursuant to Chapter 343, Hawaii Revised Statutes and Title 11, Chapter 200.1, Hawaii Administrative Rules, Department of Health, State of Hawaii.

The State of Hawaii, Department of Transportation, Airports Division (HDOT-A) as the "Approving Agency" has considered and evaluated the sum of effects of the proposed action on the quality of the environment and has made a determination that the proposed action will have no significant effect on the environment pursuant to the significance criteria outlined in Section 11-200.1-13(b), Hawaii Administrative Rules (HAR). Chapter 6 (Determination of FONSI) of the Final EA discusses the basis for this determination. With issuance of a Finding of No Significant Impact (FONSI), preparation of an Environmental Impact Statement (EIS) is not required.

Comment 2: *Gentry will start building new homes near the airport. How will Millionair's build affect the property value of Gentry's new project.*

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses would significantly affect the property value of nearby developments being proposed.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

For any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 3: *How will Millionair align with Hawaii's goal of being 100% renewable energy?*

Response 3: In 2015, Governor David Ige signed into law House Bill 623 (HB623), which directs the State's utilities to generate 100 percent of their electricity sales from renewable energy resources by 2045. HB623 set a 100 percent renewable portfolio standard (RPS) for the electricity sector. In other words, the 100% renewable energy standard does not apply to aviation in the transportation sector. However, viable alternative energy sources will be considered for incorporation into the proposed action minimize long-term energy demands and will be discussed with on-island design professionals (architects, engineers, etc.) to determine feasibility.

Comment 4: *JRf is located in a rural area of Oahu. What study been done to determine that endangered species will not be threatened by this huge constructions project?*
What impact will the aircraft/fuel emissions have on endangered species?

Response 4: We respectfully disagree with your comment that JRF is located in a rural area of Oahu. The project site is designated within the State's Urban District. HDOT-A conducted wildlife survey at JRF from June 2019 to May 2020. No adverse effects to federally protected species are anticipated as a result of the implementation of the proposed action.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: kamaku <kamaku@protonmail.com>
Sent: Saturday, March 6, 2021 4:58 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: herman.tuiolosega@hawaii.gov <herman.tuiolosega@hawaii.gov>
Subject: questions

What are the potential enviromental impacts on Kalaeloa Heritage Park?

How are these impacts being addressed?

What are the impacts of toxic chemicals on our natural resources?

How are these impacts being addressed?

What are the impacts of toxic chemicals on historical sites?

How are these impacts being addressed?

Sent with ProtonMail Secure Email.

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 8
Email: kamaku@protonmail.com

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *What are the potential environmental impacts on Kalaeloa Heritage Park? How are these impacts being addressed?*

Response 1: The Kalaeloa Heritage Park site is described on the Kalaeloa Heritage and Legacy Foundation website as a relatively undisturbed, 77-acre parcel with over 177 recorded cultural sites that consist of a heiau and other habitation sites. The project site is located about one (1) mile away from the Kalaeloa Heritage Park. No impacts to Kalaeloa Heritage Park are anticipated with implementation of the proposed action.

Comment 2: *What are the impacts of toxic chemicals on our natural resources? How are these impacts being addressed?*

Response 2: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 3: *What are the impacts of toxic chemicals on historical sites? How are these impacts being addressed?*

Response 3: Based on the findings of previous surveys, no archaeological sites are located at the project site or within JRF and, as such, no impacts on these sites are anticipated.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Anonymous Remailer (austria) <mixmaster@remailer.privacy.at>
Sent: Saturday, March 6, 2021 3:23 PM
To: Public Comment
Subject: Questions

How does Million Air plan to address the increase in traffic?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 9
Email: mixmaster@remailer.privacy.at

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Anonymous 9:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How does Million Air plan to address the increase in traffic?*

Response 1: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Anonymous Remailer (austria) <mixmaster@remailer.privacy.at>
Sent: Saturday, March 6, 2021 3:13 PM
To: Public Comment
Subject: Questions

64. What is the impact of a fuel spill on our groundwater systems?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 10
mixmaster@remailer.privacy.at

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *What is the impact of a fuel spill on our groundwater systems?*

Response 1: Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations to mitigate the risk of a release to the environment. An onsite detention basin and an oil/water separator will also be installed for the collection and treatment of stormwater. These secondary containment methods and control measures are sufficient to prevent a release to the ocean. No significant short or long-term impacts on surface, coastal and/or groundwaters in the project vicinity are anticipated during construction or operation of the proposed action. Mitigation measures will be instituted in accordance with site specific assessments, incorporating appropriate structural and/or non-structural best management practices (BMPs) and implementing erosion control measures. Any discharges related to project construction will also comply with applicable State Water Quality Standards as specified in HAR, Chapter 11-54 Water Quality Standards and HAR, Chapter 11-55 Water Pollution Control.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Anonymous <anonymous@hoi-polloi.org>
Sent: Saturday, March 6, 2021 3:32 PM
To: Public Comment; herman.tuiolosega@hawaii.go
Subject: EA

I am a concerned Kapolei resident. How will the construction of a huge building affect the traffic on the already congested streets in Kapolei? We already have roads with a lot of potholes, will the construction trucks commuting to this cite damage our already dama ged roads?

What negative impacts do airports have on the surrounding communities?

How will this construction help the surrounding community?

What kind of communication can the surrounding community expect if something bad happens at the airport?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 11
Email: anonymous@hoi-polloi.org

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *I am a concerned Kapolei resident. How will the construction of a huge building affect the traffic on the already congested streets in Kapolei? We already have roads with lots of potholes, will the construction trucks commuting to this cite damage our already dama ged roads?*

Response 1: No significant increases in traffic volume are anticipated as a result of implementation of the proposed action. Moreover, traffic associated with the proposed action is expected to be consistent with the industrial character of the nearby land uses.

Short-term traffic impacts related to proposed construction activities will occur while equipment and materials are moved to the project site. However, this traffic will be local, short-term, and consistent with the industrial character of the nearby land uses. In addition, the construction of the FBO and Fuel Farm facility will be phased over time. Thus, construction of the improvements will not create an adverse impact to traffic.

In the long-term, traffic impacts related to potential users of the FBO and trips needed to fill the fuel storage are anticipated. The fuel provider will deliver fuel from the refinery to the fuel farm by using properly licensed, register and approved commercial over-the-road fuel delivery trucks made to safely transport fuel. Fuel farm capacity storage is 90,000 gallons for Jet A, plus approximately 30,000 gallons in aircraft refueler trucks. Fuel farm capacity for 100 low lead gasoline (piston aircraft) is approximately 10,000 gallons. Frequency of delivery is based on aircraft serviced; the current estimate of deliveries is one to two times per week. Additionally, all fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The proposed facilities will not involve traffic volumes such as those which formerly used the roadways adjacent to the airport.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

There are currently no plans to improve Midway Street or Lexington Street as part of the proposed action. Proposed roadway improvements are limited to providing driveway access from the Kalaeloa Airport to Midway Street. It should be noted that the project site is within the JRF under the jurisdiction of the HDOT-A and is within the greater KCDD under the jurisdiction of the HCDA. Therefore, the Applicant will continue to coordinate with the appropriate agencies to determine whether any roadway improvements may be required.

Comment 2: *What negative impacts do airports have on the surrounding communities?*

Response 2: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that will have a significant adverse impact on surrounding communities.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 3: *How will this construction help the surrounding community?*

Response 3: The economic viability and potential for growth of the Kalaeloa and Ewa neighborhoods are closely tied to the capacity of essential infrastructure. The proposed improvements will seek to augment and serve aviation operations and drive commerce in the region.

Comment 4: *What kind of communication can the surrounding community expect if something bad happens at the airport?*

Response 4: HDOT-A will make an assessment on the appropriate parties to notify and the appropriate action that needs to be taken depending on the nature and severity of the event.

Regarding potential hazards associated with the storage of fuel, design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

From: Anonymous <anonymous@hoi-polloi.org>
Sent: Saturday, March 6, 2021 3:21 PM
To: Public Comment
Subject: Question

How big would the blast radius be if the fuel tanks exploded?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 12
Email: anonymous@hoi-polloi.org

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How big would the blast radius be if the fuel tanks exploded?*

Response 1: The proposed Fuel Farm facility will provide storage for several types of fuel, including Jet A fuel, Avgas, diesel, and mogas. Although the liquid fuel is not explosive by itself, explosive conditions could be created if certain conditions within the fuel tank and an ignition source is present.

Design of the Fuel Farm Facility will include the installation of double-wall tanks and secondary containment measures compliant with U.S. Environmental Protection Agency's (EPA) Spill, Prevention, Control, and Countermeasure (SPCC) regulations. There are various requirements under SPCC rules for inspections relating to the tanks as well as training requirements. Moreover, all line personnel will be trained and certified per ATA 103 – Standards for Jet Fuel Quality Control at Airports and the National Air Transportation Association (NATA) Safety First program and will be responsible for ensuring safe operating conditions are maintained.

Additionally, the design has been developed to meet or exceed the applicable codes, regulations and standards including NFPA 30 – Flammable and Combustible Liquids Code, and ATA-103 Standard for Jet Fuel Quality Control at Airports. The facility has also been designed to withstand forces related to earthquakes and hurricane events, including extended loss of power. With the foregoing mitigation measures in place, the proposed action is not anticipated to present any significant hazards to nearby land uses and its users.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Anonymous Remailer (austria) <mixmaster@remailer.privacy.at>
Sent: Saturday, March 6, 2021 4:05 PM
To: Public Comment
Subject: Questions

Will the increased plane traffic affect parasailing on the coast?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 13
Email: mixmaster@remailer.privacy.at

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *Will the increased plane traffic affect parasailing on the coast?*

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS).

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

From: Anonymous <anonymous@hoi-polloi.org>
Sent: Saturday, March 6, 2021 3:32 PM
To: Public Comment
Subject: Question

What is the long term goal in increasing tourism to the area?
Why is 257,000 gallons of fuel necessary? How many gallons does a plane hold?
How does this project impact air quality standards?
Will it be safe to inhale toxic fuel?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 14
Email: anonymous@hoi-polloi.org

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *What is the long term goal in increasing tourism to the area?*

Response 1: As discussed in Chapter 2 of the Draft EA and Final EA, the proposed action involves construction of a Fixed Base Operation (FBO) and Fuel Farm Facility that will provide aviation services to the general aviation community consistent with the designated uses in the JRF Airport Layout Plan (ALP), which designates the project site for use as lease lots, intended to be leased to prospective fixed base and GA operators. The proposed action is being privately funded and will be privately owned. It will not preclude HDOT-A from accepting inter-island flights or other commercial flights in the future.

Comment 2: *Why is 257,000 gallons of fuel necessary? How many gallons does a plane hold?*

Response 2: All fuel delivered to the fuel farm will be sufficient to allow adequate fuel storage to service customer requirements, which will avoid the airfields current practice of nightly transportation of aircraft refueler trucks on public roads to obtain fuel form HNL. The amount of fuel a plane holds depends on the type of aircraft being serviced.

Comment 3: *How does this project impact air quality standards?*

Response 3: Section 3.7 (Air Quality) of the EA states:

> *Fugitive dust will be controlled, as required, by methods such as dust fences, water spraying and sprinkling of loose or exposed soil or ground surface areas. As deemed appropriate, planting of landscaping will be done as soon as possible on completed areas to also help control dust. Respective contractors will be responsible for minimizing air quality impacts during the various phases of construction.*

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Exhaust emissions from construction vehicles are anticipated to have negligible impact on air quality as the emissions will be relatively small and readily dissipate. In the long-term, some vehicular emissions related to operations at the project site are expected, however, due to the generally prevailing trade winds, the emissions would be readily dissipated.

Emissions from aircraft using JRF and from vehicle-trips related to airport activities will also be lower than historical emissions when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from aviation activities at JRF would not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Comment 4: *Will it be safe to inhale toxic fuel?*

Response 4: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Anonymous <anonymous@hoi-polloi.org>
Sent: Saturday, March 6, 2021 3:32 PM
To: Public Comment
Subject: Questions

The noise from the airplanes will disturb the community. Does Million Air not consider this a potential issue for the surrounding communities?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 15
Email: anonymous@hoi-polloi.org

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *The noise from the airplanes will disturb the community. Does Million Air not consider this potential issue for the surrounding communities?*

Response 1: The project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Flight patterns are designated to minimize noise impacts on the surrounding communities as most tracks are directed towards the ocean. The proposed action will not change the location of takeoff and landing operations and will be consistent with the character of the airport operations that currently exist in the immediate vicinity.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

From: Anonymous Remailer (austria) <mixmaster@remailer.privacy.at>
Sent: Saturday, March 6, 2021 5:02 PM
To: Public Comment
Subject: Public Comment

How does the drift of hazardous emissions affect Koolina and the tourists visiting on the west side of the island?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 16
Email: mixmaster@remailer.privacy.at

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *How does the drift of hazardous emissions affect Koolina and the tourists visiting the west side of the island?*

Response 1: The Ko Olina Resort development is located approximately 2.65 miles away from JRF at its closest point. Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

From: Anonymous Remailer (austria) <mixmaster@remailer.privacy.at>
Sent: Saturday, March 6, 2021 4:34 PM
To: Public Comment; herman.tuiolosega@hawaii.go
Subject: Questions

What airport restrictions and regulations will affect the surrounding businesses and schools?

How will the residents and enviroment be affected by the toxic fumes emitted by the increased traffic of the aircrafts coming into JRF?

What is the long term plan for JRF?

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10613-01
April 16, 2021

Anonymous 17
Email: mixmaster@remailer.privacy.at

Subject: Draft Environmental Assessment
Kalaeloa Airport Fixed Base Operation and Fuel Farm Facility
Kalaeloa, Oahu, Hawaii
Tax Map Keys: (1) 9-1-013:032 (por.) and (por.) 076

Dear Sir/Madam:

Thank you for your comments dated March 6, 2021 regarding the subject Draft Environmental Assessment (EA). We acknowledge your comments and concerns which have been considered in the preparation of the Final EA with regard to meeting content requirements prescribed in Hawaii Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Final EA in Appendix B.

We offer the following in response to your comments related to the Draft EA:

Comment 1: *What airport restrictions and regulations will affect the surrounding businesses and schools?*

Response 1: It is noted that the project site is located within the existing Kalaeloa Airport (JRF), which has been used for military and general aviation aircraft operations for decades. The airport, as well as the surrounding community, were all a part of the former Barbers Point Naval Air Station (BPNAS) that pre-existed many of the surrounding businesses and schools.

With regard to any new developments or redevelopments proposed within five (5) miles of an existing airport, consultation with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) is required prior to construction to ensure compatible land uses that will not affect airport operations are being proposed, and to establish avigation easement agreements. These easements grant HDOT-A the right of flight of aircrafts, the safe operations of airports, and acceptance of certain noise levels and other phenomena associated with the airport. HRS, Chapters 261 and 262 authorizes these actions for HDOT-A.

Comment 2: *How will the residents and environment be affected by the toxic fumes emitted by the increased traffic of the aircrafts coming into JRF?*

Response 2: The proposed action is consistent with the current and planned use of the site and will not introduce any new uses that add to or significantly increase aircraft operations beyond previously existing levels associated with the former Barbers Point Naval Air Station (BPNAS). Emissions from aircraft using JRF and from vehicle-trips related to airport activities will be lower than historical emissions from when the former BPNAS was in operation. The ambient air quality conditions in the vicinity were not an issue during that time and reduced emissions from the current and proposed aviation activities at JRF will not create an adverse impact to air quality. Moreover, emissions will be readily dissipated due to prevailing trade winds.

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

Comment 3: *What is the long term plan for JRF?*

Response 3: According to the Kalaeloa Airport Master Plan, the project site is reserved for use as lease lots, intended to be leased to prospective Fixed Base and GA Operators. The proposed action is an aviation-related use, consistent with the State of Hawaii, Department of Transportation, Airports Division (HDOT-A) mission, goals, and objectives. Accordingly, the proposed action fulfills HDOT-A's goal to provide space to individual lessees for aviation-related uses at Kalaeloa Airport (JRF) and supports HDOT-A's mission to develop, manage and maintain a safe and efficient global air transportation system.

Your letter, along with this response will be reproduced and included in the forthcoming Final EA that will be published in the next issue of the Office of Environmental Quality Control's *The Environmental Notice*.

We appreciate your input and participation in this environmental review process.

Sincerely,

Keola Cheng

Keola Cheng
Director—Planning

cc: Scott Freeman, Freeman Holdings of Hawaii, LLC, DBA Million Air Honolulu
Herman Tuiolosega, State of Hawaii, Department of Transportation, Airports Division

(This page intentionally left blank)

WILSON OKAMOTO CORPORATION