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DEPARTMENT OF AGRICULTURE
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November 26, 2021

Mary Alice Evans, Director
Office of Planning and Sustainable Development
Environmental Review Program
235 S. Beretania Street, Suite 702
Honolulu, HI 96813

Dear Ms. Evans:

**Subject: Final Environmental Assessment and Finding of No Significant Impact,
Honalo Marshalling Yard Improvements TMK (3rd.) 7-9-016: 018,
North Kona District, Hawai'i Island**

Our agency has determined after a review of comments on the Draft EA for the proposed project that there will be no significant impacts in the context of Title 11, Chapter 200.1-13. With this letter, the State of Hawaii Department of Agriculture hereby transmits the Final Environmental Assessment and this Finding of no Significant Impact (FEA-FONSI) for publication in the next available edition of the Environmental Notice.

Our consultant Dr. Ron Terry will be utilizing the OEQC on line submission platform to provide your office with the required information and files concerning the Final EA, along with a PDF-formatted electronic copy of the Final EA.

Please contact Ms. Janice Fujimoto of my staff at (808) 973-9473, if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Phyllis Shimabukuro-Geiser".

Phyllis Shimabukuro-Geiser, Chairperson
Board of Agriculture

copy –Ron Terry, Geometrician Associates (PDF via email)

From: webmaster@hawaii.gov
To: [DBEDT OPSD Environmental Review Program](#)
Subject: New online submission for The Environmental Notice
Date: Tuesday, November 30, 2021 3:21:18 PM

Action Name

Honalo Marshalling Yard Improvements

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

North Kona, Hawai'i

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

(3) 7-9-016: 018; 004

Action type

Agency

Other required permits and approvals

PERMITS: • Grading, Grubbing and Driveway Permits (County DPW) • Building Permits and Plan Approval (County DPW and Planning) • Chapter 6e, HRS, Determination from State Historic Preservation Division on Historic Property Effects • Disability and Communication Access Board (DCAB) plan review and approval • Approval of Water Meter And Related Infrastructure (County DWS) • Wastewater System Approval (State DOH, Wastewater Branch)

Proposing/determining agency

Hawai'i State Department of Agriculture

Agency contact name

Janice Fujimoto

Agency contact email (for info about the action)

Janice.Fujimoto@hawaii.gov

Email address or URL for receiving comments

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Agency contact phone

(808) 973-9473

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[Map It](#)

Was this submittal prepared by a consultant?

Yes

Consultant

GEOMETRICIAN ASSOCIATES, LLC

Consultant contact name

Ron Terry

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Hilo, HI 96720
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[Map It](#)

Action summary

A 1.9-acre State property is leased by the Department of Agriculture to the Kona Producers Cooperative, which subleases it to the Hawai'i 'Ulu Cooperative to process 'ulu and other crops. The goal of the project is to build, expand or improve processing infrastructure including an industrial blast freezer; a temperature-controlled packing room; a detached, dedicated receiving station with commercial scale, access to an electric reach-in forklift, and chill storage located outside the building; improvements to washing and sanitizing processes; and utility upgrades. This will enable a five-fold increase in 'ulu production to 8,000 pounds per day and support thriving commercial 'ulu and sweet potato industries. The site is fully developed and no impacts to biological, historic, cultural or scenic resources would occur. There will be no permanent traffic impacts. Erosion and sedimentation impacts will be avoided by adherence to BMPs.

Reasons supporting determination

Chapter 11-200.1-13, Hawai'i Administrative Rules, outlines those factors agencies must consider when determining whether an Action has significant effects:

(a) In considering the significance of potential environmental effects, agencies shall consider and evaluate the sum of effects of the proposed action on the quality of the environment.

(b) In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected impacts, and the proposed mitigation measures. In most instances, an action shall be determined to have a significant effect on the environment if it may:

(1) Irrevocably commit a natural, cultural, or historic resource;

No valuable natural or cultural resources would be committed or lost by the Proposed Action, which would not involve significant historic sites or native species or habitat. No cultural resource or practices on the site will be affected, and mitigation measures will reduce impacts to adjacent natural and cultural resources to minimal levels.

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

The Proposed Action expands and in no way curtails beneficial uses of the environment.

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

The State's long-term environmental policies are set forth in Chapter 344, HRS. The broad goals of this policy are to conserve natural resources and enhance the quality of life. The Proposed Action is minor, environmentally beneficial, and fulfills aspects of these policies calling for an improved social environment by enhancing agricultural activities in a sustainable manner without causing environmental harm. It is thus consistent with all elements of the State's long-term environmental policies.

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

The Proposed Action will benefit the social and economic welfare of the community and State by supporting 'ulu and sweet potato farming and processing.

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

The Proposed Action will not have any adverse effect on public health.

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

No secondary effects are expected to result from the Proposed Action, which does not expand facilities in such a way as to induce in-migration or unduly affect roads or other public facilities.

(7) Involve a substantial degradation of environmental quality;

The Proposed Action is minor and environmentally benign and would thus not contribute to environmental degradation with adherence to Best Management Practices.

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

The Proposed Action is not related to activities in the region in such a way as to produce adverse cumulative effects or involve a commitment for larger actions.

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

The project site is completely developed for agricultural marshalling yard use and no rare, threatened or endangered plant species are present. Impacts to rare, threatened or endangered species of fauna will not occur, with planned restrictions of the timing of woody vegetation removal.

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

Slight increases in noise and effects to air quality will occur during construction, but they will be temporary and mitigated to non-significant levels. Sedimentation will be controlled through project BMPs developed as part of grading and engineering plans.

(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;

Although the Proposed Project is located in an area with volcanic and seismic risk, the entire Island of Hawai'i shares this risk. The Proposed Action is not imprudent to undertake and will employ design and construction standards appropriate to the seismic zone. The property is not located in a flood zone or any other hazardous area, and it would not affect any such area. Due to the elevation of the property at 1,300 feet above sea level, there is no risk to the Proposed Project from sea level rise. The Proposed Action

has adapted to climate change by accounting for the potential for larger storms, through minimizing hard surfaces that generate runoff in heavy rainfall, and by designing with adequate wind load to account for potentially greater storm winds.

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

The Proposed Action would not adversely impact any scenic sites or viewplanes.

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

Improvements to the buildings and facilities and new facility construction would involve unavoidable small but non-negligible carbon emissions. Continued marshaling activities would entail greenhouse gas emissions that would be essentially the same wherever the agricultural activities were taking place, likely leading to no net increase. The Proposed Project would not be expected to contribute significantly to global climate change.

Attached documents (signed agency letter & EA/EIS)

- [FONSI-Honalo.pdf](#)
- [Final-EA-Honalo-Marshalling-Yard-Improvements.pdf](#)

Shapefile

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

Action location map

- [Honalo-Marshal-Yard-2.zip](#)

Authorized individual

Ron Terry

Authorization

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

Honalo Marshalling Yard Improvements Final Environmental Assessment

TMK (3rd.) 7-9-016: 018 and 004
North Kona District, Hawai‘i Island, State of Hawai‘i

December 2021

Hawai‘i State Department of Agriculture
1428 S. King Street
Honolulu, HI 96814

FINAL ENVIRONMENTAL ASSESSMENT

Honalo Marshalling Yard Improvements Draft Environmental Assessment

TMK (3rd.) 7-9-016: 018 and 004
North Kona District, Hawai'i Island, State of Hawai'i

PROPOSING/ APPROVING AGENCY:

Hawai'i State Department of Agriculture
1428 S. King Street
Honolulu, HI 96814

CONSULTANT:

Geometrician Associates LLC
10 Hina Street
Hilo Hawai'i 96720

CLASS OF ACTION:

Use of State Land and State Funds

This document is prepared pursuant to:
The Hawai'i Environmental Protection Act,
Chapter 343, Hawai'i Revised Statutes (HRS), and
Title 11, Chapter 200.1, Hawai'i Department of Health Administrative Rules (HAR).

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TABLE OF CONTENTS

SUMMARY	ii
PART 1: PROJECT DESCRIPTION, PURPOSE AND NEED AND E.A. PROCESS.....	1
1.1 Project Description and Location	1
1.2 Purpose and Need	2
1.3 Environmental Assessment Process.....	2
1.4 Public Involvement and Agency Coordination	7
1.5 Cost and Schedule	7
PART 2: ALTERNATIVES	8
2.1 No Action Alternative.....	8
2.2 Alternative Locations for Marshalling Activities	8
PART 3: ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION	9
3.1 Physical Environment.....	9
3.1.1 Climate, Geology, Soils and Geologic Hazard	9
3.1.2 Flood Hazards	12
3.1.3 Water Quality.....	12
3.1.4 Flora, Fauna, and Ecosystems	14
3.1.5 Air Quality, Noise and Scenic Resources	17
3.1.6 Hazardous Substances, Toxic Waste and Hazardous Conditions	18
3.2 Socioeconomic and Cultural	19
3.2.1 Socioeconomic Characteristics	19
3.2.2 Cultural Resources	19
3.2.3 Archaeology and Historic Sites	24
3.3 Infrastructure	24
3.3.1 Utilities and Public Services	24
3.3.2 Roadways and Traffic.....	26
3.4 Secondary and Cumulative Impacts.....	26
3.5 Required Permits and Approvals	27
3.6 Consistency with Government Plans and Policies.....	27
3.6.1 Hawai'i State Plan	27
3.6.2 Hawai'i State Land Use Law	27
3.6.3 Hawai'i County Zoning and Special Permit	28
3.6.4 Hawai'i County General Plan and Kona CDP	28
PART 4: DETERMINATION	32
PART 5: FINDINGS AND REASONS	32
REFERENCES	34

LIST OF FIGURES

FIGURE 1 Location Map	3
FIGURE 2 Project Site Photos	3
FIGURE 3 Site Plan.....	5
FIGURE 4 Sea Level Rise Map.....	11
FIGURE 5 Flood Hazard Map	13

LIST OF APPENDICES

APPENDIX 1a Comments in Response to Early Consultation
APPENDIX 1b Comments to Draft EA and Responses

SUMMARY OF THE PROPOSED ACTION, ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The 1.9-acre State of Hawai‘i property is encumbered under Executive Order No. 3503 to the Department of Agriculture for “Marshalling Yard” Purposes. The Hawai‘i Department of Agriculture has been leasing out the site as a marshalling yard since 1985. It is leased by the Kona Producers Cooperative and subleased to the Hawai‘i ‘Ulu Cooperative to process breadfruit (‘ulu) and secondary crops such as sweet potato. The site currently processes about 1,600 pounds of ‘ulu per day. The existing structures onsite are a main building that includes a warehouse and offices, as well as a lean-to wash area. The Proposed Action consists of a variety of new, expanded or refurbished agricultural processing infrastructure improvements. Major elements include an industrial blast freezer; a temperature-controlled packing room; a detached, dedicated receiving station with commercial scale, access to an electric reach-in forklift, and chill storage located outside the building; and improvements to washing and sanitizing processes. Existing water supply, wastewater treatment and electrical capacity are inadequate to support the proposed increase in production and will be improved, along with upgrades to fire protection, accessibility and the wash area.

Production onsite is limited by the capacity to receive, wash, process and store the fruit. The goal of the Proposed Action is to increase the production of ‘ulu by a factor of five, to 8,000 pounds per day. This goal would help support a thriving commercial ‘ulu industry in Hawai‘i. An added benefit would be a five-fold increase in the production of sweet potato. Because of the limited scale of development and planned mitigation, no impacts to any biological resources would occur. Erosion and sedimentation impacts will be avoided by adherence to Best Management Practices. No permanent traffic or scenic impacts would occur. No archaeological features or other historic properties are present, and there are no cultural site or practices to be affected. Impacts are confined to very minor construction-phase noise, air quality and traffic effects that are mitigable.

PART 1: PROJECT DESCRIPTION, PURPOSE AND NEED AND ENVIRONMENTAL ASSESSMENT PROCESS

1.1 Project Description and Location

A 1.9-acre State of Hawai‘i property identified as TMK (3) 7-9-016:018 is encumbered under Executive Order No. 3503 to the Department of Agriculture for “Marshalling Yard” Purposes (Figures 1-2). The Hawai‘i Department of Agriculture has been leasing the site as a marshalling yard since 1985. It is leased by the Kona Producers Cooperative (KPC) and subleased to the Hawai‘i ‘Ulu Cooperative (HUC) to process breadfruit (‘ulu) and secondary crops such as sweet potato. The site currently processes about 1,600 pounds of ‘ulu per day. The existing structures onsite are a main building that includes a warehouse and offices as well as a lean-to wash area.

The Proposed Action consists of a variety of new, expanded or refurbished agricultural processing infrastructure improvements and is illustrated in the Site Plans in Figure 3. Major elements include:

- An industrial storage freezer operating at approximately 25 degrees F along with an anteroom to prevent condensation in the freezer when the doors are open.
- A blast freezer and temperature-controlled packing room that will maintain the final product temperature for packing.
- A detached, dedicated receiving station with an in-pit commercial scale, ample unloading space, consistent access to an electric reach-in forklift, and chill storage located outside the building. The receiving area will be built within the parking lot west of the building, near the wash area.
- Improved kitchen equipment, including a custom-built industrial batch electric or gas steamer, a mechanical peeler, a dishwasher and an industrial fruit cutter for cutting breadfruit with uniformity.
- A split system air conditioner to provide comfort cooling into the enlarged kitchen.
- Improvements to the wash area including a KEY Technology ISO-FLO Utility Shaker Model 2472 washer that will eliminate the need for pressure washing the fruit at intake. The equipment is estimated to operate for 2 hours maximum per day at a flow rate of 15 gallons per minute for approximately 156 days per year. The wash water does not contain any chemical treatment and is to be directed after use to one of two onsite drywells.
- A sanitizing unit utilizing a simple sodium chlorite solution used to control microorganisms on fruit and vegetable products. It is estimated that this sanitizing step will require on average 50 gallons of process water per day, each working day of the year. Wastewater generated by sanitizing is to be directed to a specially designed onsite treatment system.
- Structural, plumbing and electrical improvements to the wash area, which is a wood framed lean-to structure on the north side of the building.

A preliminary engineering report determined that the existing water supply, onsite wastewater treatment and electrical capacity are inadequate to support the proposed increase in production and will require improvement, along with upgrades to fire protection, accessibility and the wash area. The project includes the following elements that address these deficiencies:

- Restoration of exit door access via corridor or provision of new exit door from warehouse to the exterior.
- Upgrade the existing connection to the DWS system with new water meter, backflow preventer and increase to a 1 ½-inch lateral (to replace the existing one within the abandoned Old Honalo Road, TMK [3] 7-9-016:004, adjacent to the subject property).
- Installation of a 24,000-gallon water tank with piping connected to two onsite fire hydrants for fire protection.
- Replacement of the existing cesspool with a new treatment system. As noted above, produce wash water contains no chemical contaminants and can be directed to one of the existing onsite drywells. However, some wastewater from the facility will be different from standard wastewater due to the fruit sanitizing step, and a specialized septic system will be required. The system will be designed to meet all DOH regulations and is currently expected to be an aerated treatment unit (ATU) with a 1,000-gallon tank and a 425-square foot absorption bed that will be traffic-rated to allow placement within the parking area.
- A new ADA-compliant, van-accessible parking stall along with an ADA-compliant pathway to enter the existing building and the proposed receiving building.
- Upgrade of the electrical service capacity to accommodate new features (e.g., the blast freezer). In order to accommodate the additional load, HELCO's pole-mounted transformer and incoming service conductors will be upgraded to provide an estimated 400 amps at 208volt/3phase. Both existing meters will be removed and replaced with a upgraded equipment.
- To accommodate the connection of a separate dual photovoltaic system (PV) installation that is currently ongoing, both PV systems will be connected to the combiner panel, the customer generator disconnect will be modified for the additional PV load, and a connection to a new distribution panel will be made.
- Replacement of the general exhaust fan, installation of a dust collection system for the miller, and routing of an exhaust duct vent for the dehydrator.
- Various structural maintenance actions including painting and replacement of some wooden elements.

1.2 Purpose and Need

Production onsite is limited by the capacity to receive, wash, process and store the fruit. The goal of the Proposed Action is to increase the production of 'ulu by a factor of five, to 8,000 pounds per day. This goal would help to support a thriving commercial 'ulu industry in Hawai'i. An added benefit would be a five-fold increase in the production of sweet potato.

1.3 Environmental Assessment Process

This Environmental Assessment (EA) is being conducted in accordance with Chapter 343 of the Hawai'i Revised Statutes, and Title 11, Chapter 200.1, of the Hawai'i Administrative Rules. This law and its implementing regulations are the basis for the environmental impact process in the State of Hawai'i. According to Chapter 343, an EA is prepared to determine impacts associated with an action, to develop mitigation measures for adverse impacts, and to determine whether any of the impacts are significant according to thirteen specific criteria. Part 4 of this document states the anticipated finding that no

Figure 1. Location Map

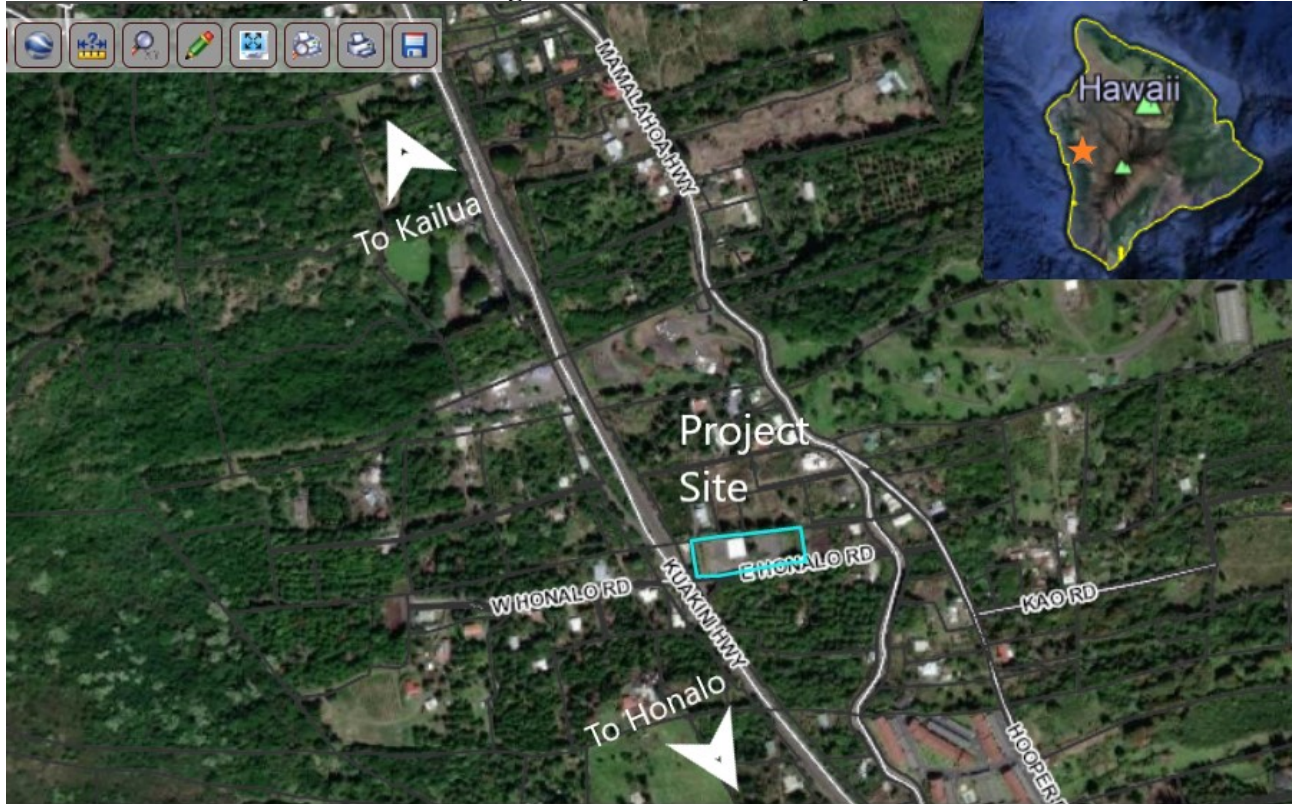


Figure 2. Project Site Photos. a. Existing Building



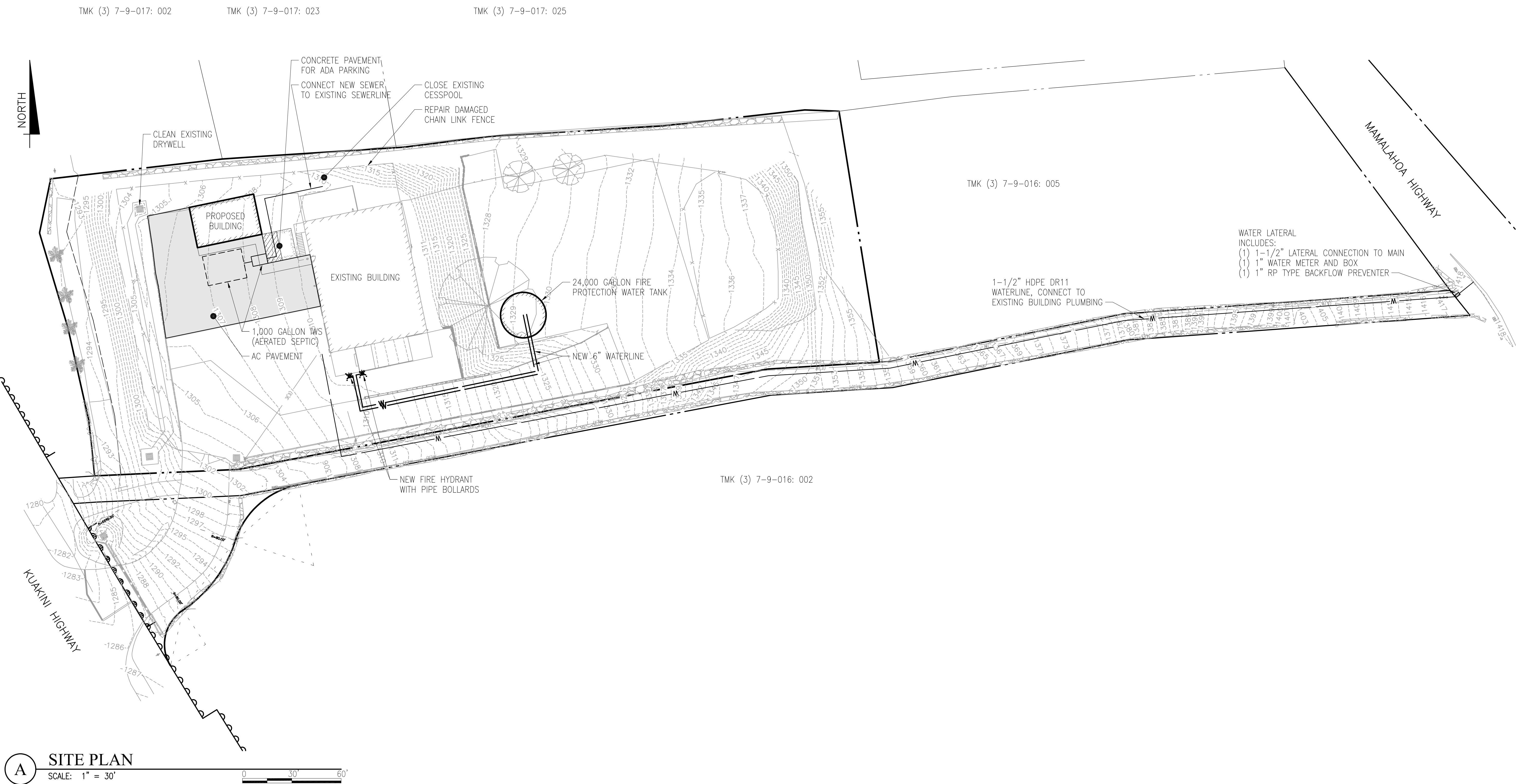
Figure 2. Project Site Photos



a. Separate driveways to yard (right) and abutting lots (left) ▲ ▼ c. Old Honalo Road, no longer used



08/23/2021 11:15 am
\\ALCO PROJECTS\2021 PROJECTS\12004-20-01 HONALO MARSHALLING YARD IMP-4-DWG\CIVIL\0-A-DWG



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SCHEMATIC SITE PLAN

DATE:	REV.	REV.	REV.
REV.	REV.	REV.	REV.
REV.	REV.	REV.	REV.

SITE IMPROVEMENTS FOR:
HONALO MARSHALLING
N. KONA, HAWAII, HAWAII
TMK: (3) 7-9-016: 018

DRAWN BY:	DESIGNED BY:
CHECKED BY:	QC'D BY:
JOB NO. 12004-20-01	
DWG. NO.	
SHEET NO.	OF X

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significant impacts are expected to occur; Part 5 lists each criterion and presents the findings for each made by the Hawai'i State Department of Agriculture, the proposing and approving agency. If, after considering comments to the Draft EA, the approving agency concludes that no significant impacts would be expected to occur, then the agency will issue a Finding of No Significant Impact (FONSI), and the action will be permitted to proceed to other appropriate approval and permit processes. If the agency concludes that significant impacts are expected to occur as a result of the Proposed Action, then an Environmental Impact Statement (EIS) will be prepared.

1.4 Public Involvement and Agency Coordination

The following agencies, organizations and individuals were consulted by letter during development of the Environmental Assessment.

State:

- Department of Health
- Department of Land and Natural Resources
- Department of Transportation
- Office of Hawaiian Affairs

County:

- County Council
- Department of Environmental Management
- Department of Public Works
- Department of Water Supply
- Finance Department
- Fire Department
- Planning Department
- Police Department

Private:

- Sierra Club
- Neighboring Property Owners: Chai, Gee, Dahl, Kameda, Taylor, Gomes

Responses received are contained in Appendix 1a. Notice of the availability of the Draft EA was published in the October 8, 2021 *Environmental Notice*. Appendix 1b contains written comments on the Draft EA and the responses to these comments. Various places in the EA have been modified to reflect input received in the comment letters; additional or modified non-procedural text is denoted by double underlines, as in this paragraph.

1.5 Cost and Schedule

Shortly after the EA is complete and necessary permits are obtained, the project will begin construction, which is expected to take about 12 months. The cost of the improvements is estimated at about \$2.5 million.

PART 2: ALTERNATIVES

2.1 No Action Alternative

Under the No Action Alternative, the Department of Agriculture would not make improvements to the Honalo Marshalling Yard. The current inefficiencies related to processing would remain, and there would be no expansion of production at the facility. Although the benefits related to farming and farm product processing, as well as traffic, would not occur, there would be no disturbance of the existing area and no temporary impacts to traffic, noise or dust during construction. The No Action Alternative provides a basis for comparing the impacts of the proposed project.

2.2 Alternative Locations for Marshalling Activities

As part of project conception, the Department of Agriculture assessed the advisability of using other sites for all or a portion of the activities that would be made possible by the Proposed Action. Because of the unique needs for the site and the pre-existing uses, no other sites appeared to be feasible and reasonable. After careful consideration of options and all their implications, no alternative sites have been advanced in this Environmental Assessment.

PART 3: ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

Basic Geographic Setting

The location for the Proposed Action is referred to throughout this EA as the *project site* (see Figures 1-3). The term *project area* is used to describe the general environs of this part of *mauka* Kona. The project site is bounded by the Highway 11 on the west and various private properties zoned and in use for agriculture on all other sides.

3.1 Physical Environment

3.1.1 Climate, Geology, Soils and Geologic Hazards

Environmental Setting

At an elevation of 1,300 feet above sea level, temperatures are moderately warm in the daytime and sometimes cool at night. Average annual rainfall is about 54 inches. Winds are generally light upslope sea breezes in the daytime and light downslope land breezes at night (UH Hilo Dept. of Geography 1998; Giambelluca et al. 2013).

The geologic substrate at the project site is lava flows from Hualālai Volcano dated to between 1,500 and 3,000 years before the present (Wolfe and Morris 1996). However, it should be noted that within 300 feet to the south and east, the substrate is lava flows from Mauna Loa lava, which over geologic time is slowly draping over the margins of Hualālai. Soil here classified by the U.S. Natural Resources Conservation Service as *Napoopoo-Honuaulu complex, 10 to 20 percent slopes* (U.S. Soil Conservation Service 1973). This complex contains areas with Honuaulu extremely stony silty clay loam, a silty organic soil that forms in ash and has 25 to 50 percent of its surface occupied by rock outcroppings, and other areas with Punaluu highly decomposed plant material. In general, permeability for this complex is rapid, runoff is variable, and erosion hazard slight. The soils are used for a variety of tree crops as well as pasturing, woodland, and wildlife areas (U.S. Soil Conservation Service 1973).

The entire Big Island is subject to geologic hazards, especially lava flows and earthquakes. The U.S. Geological Survey assesses volcanic hazard on the slopes of the currently inactive volcano Hualālai as Lava Flow Hazard Zone 4, on a scale of ascending risk 9 to 1 (Heliker 1990:23). The hazard risk is based on the fact that Hualālai has steep slopes and is historically the third most active volcano on the island. In Zone 4, about 5 percent of the area has been covered with lava since 1800, with less than 15 percent covered in the past 750 years. Immediately to the south the risk rises to Zone 3 because of the greater potential for lava flows from Mauna Loa.

The Island of Hawai‘i experiences high seismic activity and is at risk from major earthquake damage (USGS 2000), especially to structures that are poorly designed or built. On Sunday, October 15, 2006, two damaging earthquakes of magnitude 6.7 and 6.0 struck the west side of Hawai‘i Island. These earthquakes caused no known damage to the buildings or walls on the property, and no rockfall or landslide risk exists on the excavated slopes at the back of the property or any other location.

Lava tubes, which are the long cavities left behind by underground channels of lava, are common on pahoehoe lava flows in Hawai‘i, but can also be present on ‘a‘a flows. Some lava tubes have openings large enough for human entry and may thus be classified as caves. Lava tube caves in Hawai‘i may have value as historic sites, recreation areas, unique geological features, or for other reasons. No lava tubes were reported by facility users or observed during the course of engineering or biological surveys on the project site, which covered the entire area of effect but did not investigate upslope properties. It is likely that any pre-existing shallow lava tubes would have been previously breached by grading for construction at or near the site.

Impacts and Mitigation Measures

Lava flow, seismic hazards and mass wasting conditions per se impose no constraints on the Proposed Action, and the continued utilization of the project site as a marshalling yard and improvement of facilities is not imprudent to undertake in terms of geological hazards. Most of the surface of Hawai‘i Island is subject to eventual lava inundation, and any agricultural facilities in Kona face risk. Given the need for the facilities, the Department of Agriculture has determined that it is sensible to construct them in this location. Project design will take the seismic setting into account, and no mitigation measures are expected to be required.

There is a scientific consensus that the earth is warming due to manmade increases in greenhouse gases in the atmosphere, according to the United Nations’ Intergovernmental Panel on Climate Change (UH Manoa Sea Grant 2014). Global mean air temperatures are projected to increase by at least 2.7°F by the end of the century. This will be accompanied by the warming of ocean waters, expected to be highest in tropical and subtropical seas of the Northern Hemisphere. For Hawai‘i, where warming air temperatures are already quite apparent, not only is the equable climate at risk but also agriculture, ecosystems, the visitor industry and public health. Guidance to federal agencies for addressing climate change issues in environmental reviews was released in August 2016 by the Council on Environmental Quality (US CEQ 2016). The guidance urged that when addressing climate change, agencies should consider: 1) the potential effects of a project on climate change as indicated by assessing greenhouse gas emissions in a qualitative, or if reasonable, quantitative way; and 2) the effects of climate change on a project and its environmental impacts. It recommends that agencies consider the short- and long-term effects and benefits in the alternatives and mitigation analysis in terms of climate change effects and resiliency to the effects of a changing climate. The State of Hawai‘i in Hawai‘i Revised Statutes §226-109 encourages a similar analysis, and both Act 17 of the 2018 Hawai‘i Legislature and Title 11, Chapter 200.1 now require analysis of sea-level rise and greenhouse gases in environmental impact statements.

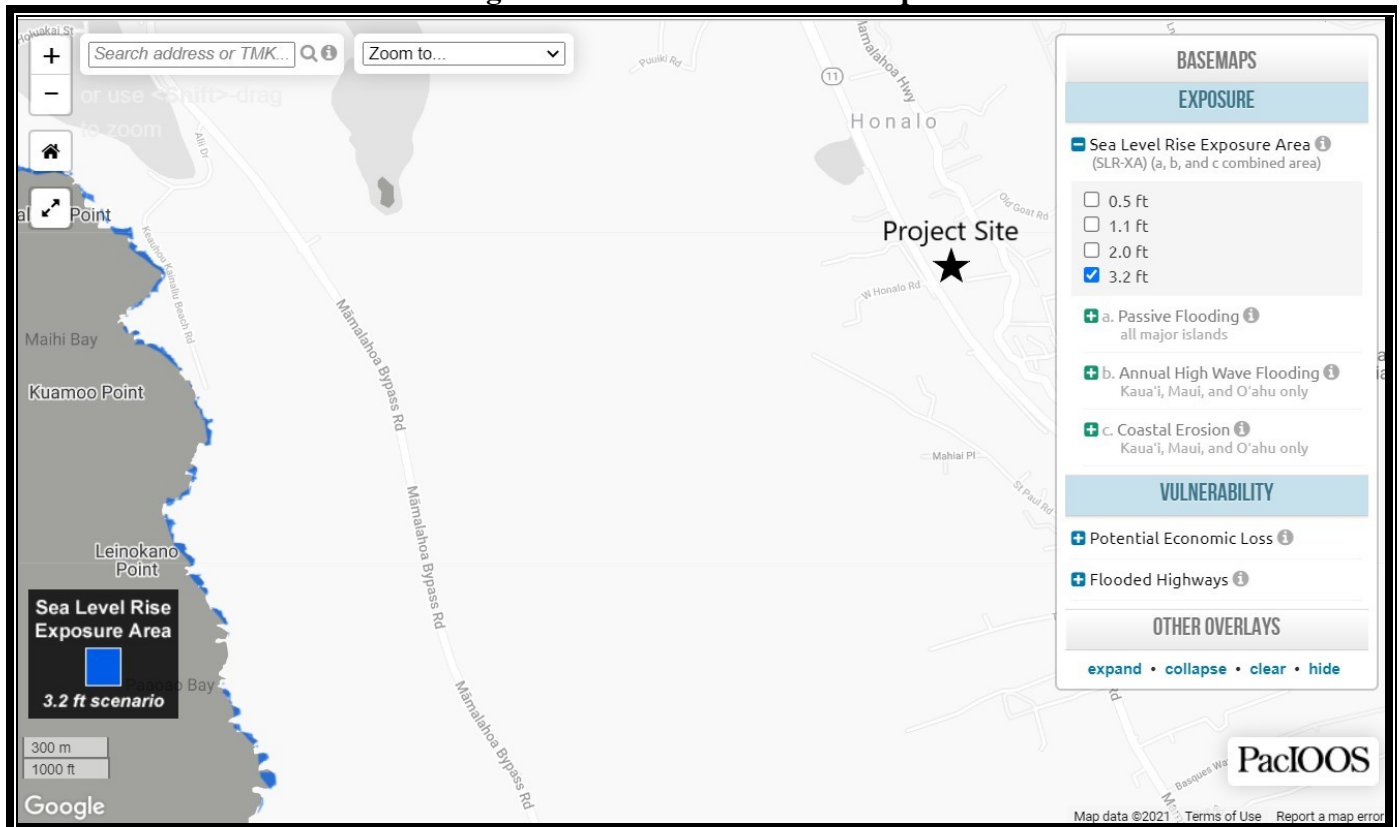
In terms of precipitation, wet and dry season contrasts will increase, and wet tropical areas in particular are likely to experience more frequent and extreme precipitation. In general, rainfall in Hawai‘i has been variable in the recent past with some years drier and some wetter than average. The El Niño Southern Oscillation (i.e., periodic variation in winds and sea surface temperatures in the Pacific, the warming phase of sea temperature known as El Niño and the cooling phase as La Niña) will likely continue to dominate precipitation patterns from year to year in the tropical Pacific. Climate change-related increases in air temperatures will lead to more evaporation and more moisture in the air. As a result, the variability in El Niño-related precipitation will probably increase, making rainfall predictions difficult. However, it is

very likely that warmer temperatures and larger and more frequent tropical storms and hurricanes will affect the Hawaiian Islands in the future.

Land uses in Hawai‘i – and not only coastal properties vulnerable to sea level rise – will be subject to increasing stress as a result of climate change. In addition to greater overland flooding, stronger and more frequent tropical storms may bring higher winds. New construction for the project will be designed with adequate wind load to account for potentially greater storm winds, and, where feasible, existing structures will be upgraded as well. As discussed in Section 3.1.2, project design will direct surface runoff into facilities of sufficient disposal capacity to accommodate reasonably expected increase in runoff.

A sea level rise viewer from the Pacific Island Ocean Observing System (<https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/>) provides graphic representation of how locations will be affected by sea level rise. Due to the elevation of the property at 1,300 feet above sea level, there is no risk to the Proposed Project from sea level rise (Figure 4). Improvements to the buildings and facilities and new construction of the facilities would involve unavoidable small but non-negligible carbon emissions. Continued marshaling activities would entail greenhouse gas emissions that would be essentially the same regardless of where the agricultural activities were taking place, likely leading to no net increase. The Proposed Project would not be expected to contribute significantly to global climate change.

Figure 4 Sea Level Rise Map



Source: Pacific Island Ocean Observing System: <https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/>

3.1.2 Flood Hazard

Existing Environment

Floodplain status for many areas of the island of Hawai‘i has been determined by the Federal Emergency Management Agency (FEMA), which produces the National Flood Insurance Program’s Flood Insurance Rate Maps (FIRM). The entire area is depicted on the FIRM map within Zone X: areas determined to be outside the 0.2% annual chance floodplain. Maps printed by the Pacific Tsunami Warning Center/Hawai‘i County Civil Defense Agency locate the project site outside the area that should be evacuated during a tsunami warning (<https://tsunami.coast.noaa.gov/#/>). The project site has two existing, permitted drywells for drainage.

Impacts and Mitigation Measures

There will be no impact to the floodplain in the area. The Department of Agriculture will ensure that its contractor performs all earthwork and grading in conformance applicable standards and regulations of Chapter 27, “Flood Control,” of the Hawai‘i County Code and the Storm Drainage Standards,” County of Hawai‘i, October, 1970 (as revised). Chapter 27 and the Storm Drainage Standards require that all increases in runoff due to a project’s development must be captured and disposed of. During final design, the project engineers will utilize the Storm Drainage Standards to calculate rainfall runoff, accounting for all new development. It is expected that the runoff increase will be negligible and that the existing drywell will be capable of absorbing runoff. In necessary, expanded or additional drainage structures will be designed and constructed to capture and retain the increase in rainfall runoff.

3.1.3 Water Quality

Existing Environment

No permanent streams, wetlands or ponds are present in or near the project site. Sensitive receiving waters at the project site are limited to the Pacific Ocean itself, which is approximately 1.6 miles downslope. The waters of Kona are classified as “AA,” with the highest level of water quality goals. Hawai‘i Administrative Rules (HAR) Chapter 11-54 03(c)(1) states that class AA waters are “high quality waters ... in which water quality is expected to exceed that necessary to support oceanographic research, propagation of aquatic communities and wildlife, compatible recreation and aesthetic enjoyment. It is the objective of class AA waters that these waters remain in their natural pristine state as nearly as possible with an absolute minimum of pollution or alteration of water quality from any human caused source or actions. To the extent practicable, the wilderness character of these areas shall be protected.” These coastal waters are important for fishing, recreation, visual quality, and traditional practices.

Figure 4. Flood Hazard Map



Flood Hazard Assessment Report

www.hawaiiinfip.org

Property Information

COUNTY: HAWAII
 TMK NO: (3) 7-9-016:018
 WATERSHED: WAIAHA
 PARCEL ADDRESS: ADDRESS NOT DETERMINED
 HONOLULU, HI 96725

Notes:

Flood Hazard Information

FIRM INDEX DATE: SEPTEMBER 29, 2017
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL: 1551660966F
 PANEL EFFECTIVE DATE: SEPTEMBER 29, 2017

THIS PROPERTY IS WITHIN A TSUNAMI EVACUATION ZONE: NO
 FOR MORE INFO, VISIT: <http://www.scd.hawaii.gov/>

THIS PROPERTY IS WITHIN A DAM EVACUATION ZONE: NO
 FOR MORE INFO, VISIT: <http://dlnr.hawaii.gov/dam/>



0 100 200 ft

Disclaimer: The Hawaii Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use, accuracy, completeness, and timeliness of any information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR, its officers, and employees from any liability which may arise from its use of its data or information.

If this map has been identified as 'PRELIMINARY', please note that it is being provided for informational purposes and is not to be used for flood insurance rating. Contact your county floodplain manager for flood zone determinations to be used for compliance with local floodplain management regulations.

FLOOD HAZARD ASSESSMENT TOOL LAYER LEGEND (Note: legend does not correspond with NFHL)

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD - The 1% annual chance flood (100-year), also known as the base flood, is the flood that has a 1% chance of being equalled or exceeded in any given year. SFHAs include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:

	Zone A: No BFE determined.
	Zone AE: BFE determined.
	Zone AH: Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
	Zone AO: Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
	Zone V: Coastal flood zone with velocity hazard (wave action); no BFE determined.
	Zone VE: Coastal flood zone with velocity hazard (wave action); BFE determined.
	Zone AEF: Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE.

NON-SPECIAL FLOOD HAZARD AREA - An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

	Zone XS (X shaded): Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
	Zone X: Areas determined to be outside the 0.2% annual chance floodplain.

OTHER FLOOD AREAS

	Zone D: Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase applies, but coverage is available in participating communities.
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Impacts and Mitigation Measures

Minimal landclearing is expected as part of the improvements, and all grading would occur in an area much less than one acre and thus will not require a National Pollutant Discharge Elimination System (NPDES) permit. Plans submitted as part of the application for a County grading permit will ensure that offsite erosion and sedimentation impacts will be minimized, if not completely avoided. The Hawai'i State Department of Agriculture will ensure that its contractor performs all earthwork and grading in conformance with Chapter 10, "Erosion and Sedimentation Control," of the Hawai'i County Code.

The plans will specify Best Management Practices (BMPs) to minimize the potential for sedimentation, erosion and pollution of coastal waters. BMPs that will be specified in final design for the Proposed Action will likely include, but may not be limited to:

- The total amount of land disturbance will be minimized. The construction contractor will be limited to the delineated construction work areas within the project site.
- The contractor will not allow any sediment to leave the site.
- Construction activities with the potential to produce polluted runoff will not be allowed during unusually heavy rains or storm conditions that might generate storm water runoff.
- Cleared areas will be replanted or otherwise stabilized as soon as possible.
- Structures for sediment control will include grated inlets in the parking area, silt fences, and a stabilized construction entrance.

3.1.4 Flora, Fauna and Ecosystems

Existing Environment

The natural vegetation of this part of Kona was most likely mesic forest dominated by 'ōhi'a (*Metrosideros polymorpha*) and koa (*Acacia koa*) (Gagne and Cuddihy 1990). These original communities have been greatly altered by traditional Hawaiian cultivation and later cattle grazing, agriculture and urban uses. The vegetation of the general project area is now mainly managed vegetation in the form of coffee farms and commercial and residential landscaping.

In the areas not occupied by buildings and pavement at the Honalo Marshalling Yard, the project site itself has completely managed vegetation, with 'ulu (*Artocarpus altilis*) seedlings in the back of the lot. Several ornamental or weed trees are present including various palms, African tulip (*Spathodea campanulata*), *Cecropia obtusifolia* and octopus tree (*Schefflera actinophylla*). Various weedy vines and herbs are found in limited areas of the project site, including tinaroo (*Glycine wightii*), kikuyu grass (*Cenchrus clandestinus*) and Guinea grass (*Megathyrsus maximus*), along with the hardy native herb 'uhaloa (*Waltheria indica*). Weeds are managed mechanically and chemically. No plant species classified as threatened or endangered (USFWS 2021) are present or would be expected on the project site.

The working agricultural processing project site has only limited habitat for native terrestrial fauna. Based on previous surveys of this zone, typical expected birds include common myna (*Acridotheres tristis*), northern cardinal (*Cardinalis cardinalis*), spotted dove (*Streptopelia chinensis*), zebra dove (*Geopelia*

striata), Japanese white-eye (*Zosterops japonicus*), saffron finch (*Sicalis flaveola*), nutmeg mannikin (*Lonchura punctulata*), northern mockingbird (*Mimus polyglottos*), house finch (*Carpodacus mexicanus*), and perhaps parakeets (*Aratinga* sp.).

Very few native species of native birds would be expected at the project site, and none would find it appropriate habitat. It is possible that the Hawaiian hawk or 'io (*Buteo solitarius*), the Hawaiian subspecies of the short-eared owl or pueo (*Asio flammeus sandwichensis*), and the Pacific golden-plover or kolea (*Pluvialis fulva*) would fly over or briefly rest on the property. It is unlikely that other native forest birds, such as various species of Hawaiian honeycreepers, would use the project site due to its low elevation, urban context, alien vegetation and lack of adequate forest resources.

The formerly federally-endangered Hawaiian hawk – which remains listed by the State of Hawai'i – occurs throughout the island of Hawai'i from sea level to 8,530 feet in elevation. Although no hawks were observed during site reconnaissance, they are frequently seen in a variety of habitats in Kona and indeed throughout the island. They generally prefer 'ōhi'a forest habitat but are known from both native and non-native forests and even range into farmland and towns to forage. Hawks nest in tall trees within their large territories from early March through the end of September. Most nesting occurs in native 'ōhi'a trees but non-native trees, including eucalyptus, ironwood, mango, coconut palm and macadamia, may also be used. The agricultural land uses on and around the project site do not offer optimal nest sites for Hawaiian hawks. However, there is a small but not negligible possibility that hawks could nest on the project site or nearby. If nests were present on or very near the property, any major grading or tree removal might disturb nesting, although the context adjacent to farms, housing and highways somewhat reduces the likelihood of both nests and disturbance potential.

As with all of the island of Hawai'i, several threatened or endangered seabirds may overfly in the general project area, including the endangered Hawaiian petrel (*Pterodroma sandwichensis*), the endangered band-rumped storm petrel (*Oceanodroma castro*), and the threatened Newell's shearwater (*Puffinus auricularis newelli*). Although they may fly over the project site on their way to and from mountain nesting areas and the open ocean, no suitable nesting habitat for any of these seabird species is present in the project area. The primary cause of mortality in these species in Hawai'i is thought to be predation by alien mammalian species at the nesting colonies. Collision with man-made structures is another significant cause. Nocturnally flying seabirds, especially fledglings on their way to sea in the summer and fall, can become disoriented by exterior lighting. Disoriented seabirds may collide with manmade structures and, if not killed outright, may become easy targets of predatory mammals.

It is likely that endangered Hawaiian hoary bats (*Lasiurus cinereus semotus*), the only native Hawaiian land mammals, at least occasionally utilize the trees on or near the property for feeding and perhaps roosting. They have been found throughout the island of Hawai'i. Bats may forage for flying insects on the property on a seasonal basis and may also roost in trees and large shrubs. Bats are often visible while they are feeding on flying insects near dusk and dawn. Their presence can also be verified by ultrasound detectors or radar. If a bat is detected during a night's study, this merely indicates that they were present in the area. Conversely, the absence of bat detections does not indicate an absence of bats, which may have been absent for only a night, a week, or a season, or may have been present but undetected. Determination of bat populations or usage patterns requires much more sophisticated, long term studies. No bats were observed in our site reconnaissance, which took place in full daylight and did not use any

detection equipment. For the purposes of this assessment, it is assumed that Hawaiian hoary bats are present at least some of the time, as they have been frequently seen or detected by ultrasound and radar in rural Kona. Hawaiian hoary bats are vulnerable to disturbance during the summer pupping season and require special mitigation measures.

We did not observe any non-native mammals on the property. It is likely that feral pigs (*Sus scrofa*), feral cats (*Felis catus*), Indian mongooses (*Herpestes a. auropunctatus*), mice (*Mus* spp.), rats (*Rattus* spp.), and domestic dogs (*Canis f. familiaris*) are sometimes present. None of these alien mammals have conservation value and all are deleterious to native flora and fauna.

There are no native terrestrial reptiles or amphibians in Hawai'i. No reptiles were seen but there are probably various species of skink (Family: Scincidae) and gecko (Gekkonidae) present. Like much of *mauka* Kona, there are coqui frogs (*Eleutherodactylus coqui*) at the site. It is possible that bufo toads (*Bufo marinus*) and other amphibians are also present.

No invertebrate survey was undertaken as part of the survey, but in general, rare, threatened or endangered invertebrates on the Island of Hawai'i tend to be associated with either higher-elevation, older substrate rainforests (e.g., various *Drosophila*); coastal dry shrubland (e.g., various *Hylaeus*); the summit of Mauna Kea (*Nysius wekiuicola*); extremely dry, disturbed 'a'a flows (*Manduca blackburnii*); or aquatic settings (various *Megalagrion*). A fully developed agricultural marshaling yard is not a suitable habitat for any threatened or endangered invertebrates.

Impacts and Mitigation Measures

Because of the lack of native ecosystems or threatened or endangered plant species on the project site, the Proposed Action would have no adverse impacts to native vegetation or habitat. The Proposed Action does not require removing any existing trees. Mitigation measures will be instituted in order to avoid impacts to Hawaiian hoary bats and listed seabirds:

- There will be no major trimming of woody vegetation taller than 15 feet during the bat pupping season, which runs from June 1 through September 15 each year.
- Outdoor lighting may attract endangered seabirds, which may become disoriented by the lighting, resulting in birds being downed. To avoid potential seabird downing through interaction with outdoor lighting, no construction or unshielded equipment lighting will be used after dark between the months of April and October. All lighting will be kept to minimum necessary levels. No additional permanent exterior lighting is planned for the site or building; existing lighting will remain unless replacement is required for the new floor plan. Any replacement exterior lighting will be blue-deficient LED with a Correlated Color Temperature (CCT) of 2700 Kelvin, with a minimum 80 Color Rendering Index (CRI), and with efficacy and controls complying with the applicable version of the International Energy Conservation Code (IECC). All lighting will be shielded so as to lower the ambient glare, in conformance with the Hawai'i County Outdoor Lighting Ordinance (Hawai'i County Code Chapter 9, Article 14). This will not only reduce the risk that threatened or endangered seabirds may be attracted to and then disoriented by lighting, but will also assist in protecting dark skies.

3.1.5 Air Quality, Noise, and Scenic Resources

Environmental Setting

As discussed in Section 3.1.2, winds in the area exhibit a daily reversal, with light sea breezes during the daytime (peaking in the afternoon) and a shallow mountain drainage wind from the east at night. Wind speeds are generally light and seldom exceed an average daily speed of 10 miles per hour. Light and variable westerly “kona” winds occasionally replace this pattern, most often in winter (UH-Manoa, Dept. of Geography 1998). Air quality in the project area is somewhat affected by emissions from motor vehicles, industry and natural sources. For 35 continuous years, volcanic emissions of sulfur dioxide from Kilauea Volcano converted into particulate sulfate, forming a volcanic haze, locally called vog. Vog becomes trapped in the Kona atmosphere because of the diurnal wind reversal, which creates a largely closed airshed system. In August 2018, eruption activity at Kilauea ceased, which reduced vog to essentially zero, but then a summit eruption ensued, with fewer emissions and thus reduced levels of vog. This eruption also ceased, but future eruptions are certain. Manmade air pollution sources include oil-fired power plants, which emit sulfur dioxide, nitrogen oxides, and particulate matter, and motor vehicles, which emit carbon monoxide, nitrogen oxides and hydrocarbons (an ozone precursor), as well as smaller amounts of other pollutants. The location of the marshalling yard exposes it to minor levels of automobile exhaust pollutants from Highway 11.

The moderate noise levels derive mainly from motor vehicles and road maintenance on Highway 11 and agricultural activities on the subject and adjacent properties. No noise-sensitive properties are present nearby.

The Hawai‘i County General Plan (Hawai‘i County 2005:7-12) notes regarding scenic resources in North Kona that:

“The Kona districts have long attracted people because of their natural beauty. Although man-made structures are in some places dominant, the vast expanse of the Kona landscape is still the area's most striking feature. North Kona, in the area called Kekaha, is characterized by a sense of openness created by expansive areas of lava flows. Vegetation on the lava is comprised of low pockets of grasses and scrub trees. From the coastline, the land climbs slowly to the distant saddle plateau between Mauna Kea and Mauna Loa. This long natural grade also contributes to the sense of openness and space. The rest of North Kona is dominated by Hualālai. Its steep slopes provide a green backdrop when viewed from the coast, or spectacular views of the coastline, ocean and horizon from higher elevations. Part of Kona’s natural beauty is also due to the wide range of climatic conditions in a relatively short distance. Such variations extending from the coastal areas to the higher elevations are evidenced by changes in vegetation, producing a wide scope of different physical environments.”

The property and its structures are barely visible from any locations, are not scenic, and do not block ocean views from highways or interfere with any scenic vantages.

Impacts and Mitigation Measures

Due to the minor scale of improvements, the Proposed Action would not measurably affect air quality, except temporarily and minimally during construction; dust will be strictly controlled through BMPs.

Depending on methods, construction may generate loud noise exceeding 95 decibels at times, impacting nearby areas. In cases where construction noise is expected to exceed the Department of Health's (DOH) "maximum permissible" property-line noise levels, contractors are required to consult with DOH and determine whether they should obtain a permit per Title 11, Chapter 46, HAR (Community Noise Control) prior to construction. DOH will review the proposed activity, location, equipment, project purpose, and timetable in order to decide upon conditions and mitigation measures, such as restriction of equipment type, maintenance requirements, restricted hours, and portable noise barriers. Such measures, when needed, are effective in reducing noise to minimal levels. No permanent noise impacts would occur.

The Hawai'i County General Plan calls for preserving the quality of areas endowed with natural beauty and protecting scenic vistas and view planes from becoming obstructed. No impacts to scenic sites, vistas or view planes would occur. All permanent exterior lighting has been kept to minimum necessary levels to protect dark skies and endangered seabirds, with shielded lights so as to lower the ambient glare, in conformance with the Hawai'i County Outdoor Lighting Ordinance (Hawai'i County Code Chapter 9, Article 14). No additional exterior lighting is planned. Any replacement lighting will be blue-deficient LED with a CCT of 2700 Kelvin and a minimum 80 Color Rendering Index (CRI).

3.1.6 Hazardous Substances, Toxic Waste and Hazardous Conditions

Environmental Setting

No Phase I Environmental Site Assessment was conducted for the project site. It has long history of agricultural use and managers are not aware of any hazardous substances, toxic waste or hazardous conditions. State databases did not indicate any Underground Storage Tanks (USTs), Leaking Underground Storage Tanks (LUSTs), or records of incidents or releases on the site or in adjacent properties (<https://eha-cloud.doh.hawaii.gov/iheer/#!/viewer>).

Impacts and Mitigation Measures

There are no known hazardous materials on site, and the agricultural marshalling activities do not involve hazardous materials. Although it is unlikely that any heretofore unknown hazardous materials or toxic or radioactive waste would be found on the project site during construction, construction best management practices will include appropriate response and remediation should such conditions be encountered.

3.2 Socioeconomic and Cultural

3.2.1 Socioeconomic Characteristics

The neighborhood of the project site has agricultural zoning and includes a number of small coffee farms. A large condominium apartment complex (the Kona Coffee Villas) is present about 800 feet to the southeast, beyond which is the small commercial core of Honalo, which includes a roughly quarter-mile strip of properties flanking Highway 11.

Impacts and Mitigation Measures

The Proposed Action would affect and benefit primarily Kona farmers and their families through expansion in the capacity for receiving, washing, processing and storage of 'ulu fruit. Achieving the project goal of substantially increasing the production of 'ulu and sweet potato would help to support and expand agricultural production, family farm income, agricultural jobs, and social and economic self-sufficiency. Consultation to date with the closest neighbors has not revealed any objections to the plans.

3.2.2 Cultural Resources

Cultural and Historical Background

The first colonization of Hawai'i Island is believed to have occurred on the eastern side by roughly 1000 A.D. Early settlers are thought to have first come to the leeward side of the Hawai'i Island for the procurement of resources during the Early Expansion period up to 1600 A.D. (Cordy 1995). Permanent habitation of Kona began toward the end of that period (Cordy 1995; Schilt 1984).

The Expansion Period was characterized by significant social stratification, socioeconomic changes and land modification. Most of the ecologically favorable zones of the windward and coastal regions of all major islands were settled and the more marginal leeward areas were being developed. The greatest population growth occurred during the Expansion Period, as did efforts to increase upland agriculture. Rosendahl (1972) proposed that settlement at this time was related to seasonal, recurrent occupation in which coastal sites were occupied in the summer to exploit marine resources, and upland sites were occupied during the winter months, with a focus on agriculture. An increasing reliance on agricultural products may have caused a shift in social networks as well, according to Hommon (1976). Hommon argued that kinship links between coastal settlements disintegrated as those links within the *mauka-makai* settlements expanded to accommodate exchange of agricultural products for marine resources. This shift is believed to have resulted in the establishment of the *ahupua'a* system discussed below. The implications of this model include a shift in residential patterns from seasonal, temporary occupation to permanent dispersed occupation of both coastal and upland areas.

The project site falls within the traditional *moku* of Kona, in what is today known as North Kona, on the dry leeward side of the island. Kona extends from the shore across the entire volcanic mountain of Hualālai, and continues to the summit of Mauna Loa. Many events documented in the traditional history of Kona are associated with 'Umi-a-Liloa, whose father was the first to unify rule there. Kona was a

popular dwelling place of chiefs (Kamakau 1992), and traditional Hawaiian political authority was centered in the area from Kailua to Keauhou from at least the 15th century to the reign of Kamehameha I.

Sometime during the A.D. 1400s, the *moku* were further divided into distinct land units known as *ahupua'a* (Kirch 1985). *Ahupua'a* were prototypically long, wedge-shaped slices of land that incorporated all of the eco-zones from the mountains to the sea and several hundred yards beyond, which afforded their inhabitants unlimited access to a diverse subsistence resource base (Cordy 2000). Entire *ahupua'a* or portions thereof were managed by appointed *konohiki*, or lesser chiefs, who acted as overseers under the rule of an *ali'i 'ai ahupua'a*. The *moku* of Kona stretching from north to south has over 100 *ahupua'a*, and approximately 44 of these fall within Kona's fertile central region. The majority of the *ahupua'a* in central Kona are fairly narrow and include a combination of forest lands, upland farms, coastal *kula*, and offshore resources. The project site for the Honalo Marshalling Yard is within the *ahupua'a* of Honalo.

At the time of contact with Captain James Cook and Europeans, the largest villages in this part of Kona were Ka'awaloa, at the north end of Kealahou Bay, and Kekua, where Napo'opo'o is now found. Inland settlements were smaller and scattered. Fifteen years after Cook's visit, the botanist and surgeon on George Vancouver's expedition, observed about the inland areas such as the project site:

“Seeing these upper regions so industriously cultivated and teeming with productive crops...we are certain that nothing but wars, destructive wars, and commotions can ever reduce them to scarcity, seeing that they thus avail themselves of Nature's bounty in the conformation of their country by extending their cultivation to different regions of the air, they secure a continued succession of crops and therefore can never be destitute of supply” (Menzies 1920).

This account describes adaptation of cultivated plants to particular microclimates, which varied primarily with elevation. Just above the *Kahakai* or shoreline region lay the lowest and driest of zones, the *Kula* or the coastal lowland. It was only sparsely cultivated but the source of lei plants such as 'ilima (*Sida spp.*) and medicinal plants such as maiapilo (*Capparis sandwichiana*). Located above the *Kula* was the *Kalu'ulu*, or breadfruit (*Artocarpus altilis*) cultivated region, with useable space in between these trees planted with other food plants. A gradual boundary led to the next highest region, termed the 'Apa'a zone, intensively cultivated with *kalo* (*Colocasia esculenta*), *wauke* (paper mulberry, *Broussonetia papyrifera*), and *kō* (sugar cane). Planting areas were divided by *kuaiwi*, or low stone walls running with the slope, which may have also served as trails between cultivated areas. Above, the 'Apa'a gave way to the 'Ama'u zone, or fern forest zone, so-named for a common tree fern (*Sadleria cyatheoides*), and where *mai'a*, or bananas, were the dominant cultivar. Sweet potatoes, or *uhi*, were planted in a wide range of microclimates, from the *Kula* to the higher and wetter 'Apa'a (Kelly 1983). The project site in Honalo would presumably have been within the *Kula* or 'Apa'a zone.

The ancient horticulturalists observed the elements for signs of rain and invoked certain deities to encourage rainfall and promote abundance. Kona is fittingly associated with the deity Lono, who was considered the “rain maker” and an icon of fertility (Handy et al. 1972). Lono was often identified with the southern coast of Hawai'i Island, and according to Kalokuokamaile, a native of Kona, temples dedicated to Lono were established throughout Kona to invoke rain and fertility (ibid.). Lono was also embodied in dark rain clouds brought on by the southerly (*kona*) storms. In traditional myths, it is believed that Lono migrated from the south and landed in Kona where he introduced several food plants,

such as taro, sweet potato, yams, sugar cane, bananas and ‘awa (kava) (ibid.). Mythology permeated agricultural pursuits as well as other facets of daily life.

After Western contact, social change soon accelerated, driven by disease and drought, missionary activity, trade and urbanization. Trade with both the Western world and Asia brought the beginnings of a money economy. The opportunity to profit from sandalwood harvests proved attractive to the *ali‘i*, distracting their attention from food production. While at first whaling and other forms of trading centered around Kealakekua, activity here soon declined as Kamehameha directed ships to the urban centers of Kailua, Lahaina, and Honolulu. Kamehameha embraced foreign trade, including the provisioning of whaling vessels and sandalwood traders (Schilt 1984). In upper Kona, significant changes in agriculture occurred due to trade and frequent importation of exotic species, with the addition of western technologies. Farmers started cultivating cotton, coffee, citrus, pineapple, and tobacco, which were often grown not as staples but for export and trade. By 1818 distillation was being used to make liquor out of *ki* (ti) root and sugar cane (Golovnin 1979).

In a review of historical events in the *ahupua‘a* of Honalo as part of an archaeological assessment for activities on a nearby ranch, Haun and Henry (2015) note a historical event with particular significance to the area: the Battle of Kuamo‘o. This 1819 rebellion by defenders of the traditional religion against the newly Christianized Hawaiian monarchy was led by Kekuaokalani against the young King Liholiho. Kamehameha’s consort Ka‘ahumanu aided the young king in the overthrow of the *kapu* system in 1819. Liholiho formally dissolved the ancient system by breaking a *kapu* eating with Ka‘ahumanu and his mother, Keopuolani. The king then ordered the destruction of *heiau* and the overthrow of the old idols. Liholiho’s cousin Kekuaokalani, the keeper of the war god Kuka‘ilimoku, was enraged by the destruction of the ancient *kapu* system and mounted a rebellion from Ka‘awaloa on the north side of Kealakekua Bay. After a failed attempt to peacefully end the rebellion by Keopuolani, Liholiho’s forces, led by Kalanimoku, met those of Kekuaokalani. Following an initial skirmish at Lekeleke in Keauhou, the main battle occurred in Kuamo‘o near the coast, which resulted in hundreds of casualties, the death of Kekuaokalani, and Kalanimoku’s victory. Most of the battle took place near the coast, just south of Honalo Ahupua‘a, between Kekuaokalani Heiau in Ma‘ihi and Lonohelele Heiau in Kuamo‘o. Some of the fallen warriors of the battle are interred just north of coastal Honalo in an area now known as the Lekeleke Battle Site.

In the early 19th century introduced diseases rapidly took their toll on the native population, and by 1833 the population of the entire Kona district was estimated at 10,000-12,000, compared to the about 11,000 at Kealakekua alone around the time of contact. Kealakekua Bay was closed to ships for several years in 1846 due to epidemics. The effects of disease were exacerbated by drought and fire during this period.

Profound religious, socioeconomic and demographic changes in the early 1800s resulted in the establishment of a Euro-American style of land tenure. The *Māhele ‘Āina* of 1848 was the vehicle used to divide the land between the crown, government, *konohiki* and native tenants. Prior to this land “reform”, all the land and natural resources of Hawai‘i were held in trust by the *ali‘i* who, in concert with *konohiki* land agents, meted out use rights to the native tenants at will. The *Māhele* of 1848 would forever change the land tenure and the landscape of the Hawaiian Islands. During the *Māhele* all lands were placed in one of three categories: Crown Lands (for the occupant of the throne), Government Lands, and Konohiki Lands; all three types of land were subject to the rights of the native tenants therein.

The *ali* 'i and *konohiki* were required to present their claims to the Land Commission to receive a Land Commission Award (LCAw.) for lands provided to them by Kamehameha III. They were also required to provide commutations to the government in order to receive royal patents on their awards. The lands were identified by name only, with the understanding that the ancient boundaries would prevail until the land could be surveyed. This process expedited the work of the Land Commission and subsequent land transfers (Chinen 1958). In 1862, the Commission of Boundaries (Boundary Commission) was established to legally set the boundaries of all the *ahupua* 'a that had been awarded as a part of the *Māhele*. However, boundary descriptions were not collected for all *ahupua* 'a. Honalo Ahupua 'a was claimed as government land.

Conditions of the *Māhele* 'Āina also afforded native tenants the right to claim, and acquire title to, parcels that they actively lived on or cultivated for a living. These *kuleana* claims were essentially transfers of ownership from the *ali* 'i nui (high chief) or *konohiki* (lesser chief/overseer), who had been awarded ownership of the *ahupua* 'a by Kamehameha III, to the commoners. The Board of Commissioners oversaw the program and administered the *kuleana* as Land Commission Awards (LCAw.). There were 14 claims for *kuleana* in Honalo, though only 12 were subsequently awarded. Of the 12 awarded parcels, which ranged from 0.3 to 3.4 acres, only four are shown on current tax maps (LCAws. 7958, 7960, 8575:2 and 9188), all of them near the coast and far from the project site.

The *Māhele* 'Āina of 1848 effectively severed almost all connection the *maka* 'ainana, or commoners, had maintained with their traditional croplands, leaving ownership of much of Kona in the hands of a select few individuals. By the years after shortly after 1850, accounts suggest that the Kona field system was largely unmaintained, depopulation of the area being extensive (Hill 1856, Anderson 1865).

In conjunction with the *Kuleana* Act, the King authorized the issuance of Land Grants to applicants for tracts of Government land that were allocated during the *Māhele*. These Land Grants were generally larger than those awarded by the Land Commission. The Act resolved that portions of the Government Lands should be set aside and sold as grants ranging in size from one to fifty acres at a cost of fifty cents per acre. The stated goal of this program was to enable native tenants, many of whom were insufficiently awarded or not awarded land through the *Kuleana* Act, to purchase lands of their own. Despite the goal, this provided the mechanism that allowed many foreigners to acquire large tracts of the Government Lands. According to Maly and Maly (2001), there were six applicants for Land Grants between 1849 and 1886 in Honalo Ahupua 'a. Emerson's 1891 Register Map #1281 shows that the project site was once part of Grant 1172 to Kamoehalau. The grant was subdivided into numerous farm parcels in the 20th century, with the project site being acquired by the State of Hawai'i in 1984.

Beginning in the late 1800s, there was a short-lived attempt at commercial sugar cultivation in central Kona (Kelly 1983). The Kona Sugar Company, which started in 1899, built a sugar mill in Kona and initially obtained most of its raw cane through purchase from independent growers. The West Hawaii Railroad Company began construction of the railroad grade for transporting sugar cane to a mill in Waiaha to the north began in 1901 (Conde and Best 1973). The 1928 USGS Kailua Quadrangle map shows the West Hawaii Railroad line extending through the central portion of Honalo at approximately 650 to 700 feet elevation, well *makai* of the project site. By 1926, the sugar operation ceased. While commercial coffee cultivation started slowly, by the turn of the century it dominated agriculture in Kona,

having displaced other crops including sugar cane, which was not as profitable in the dry climate. Coffee farming affected settlement patterns by bringing an influx of *haole* entrepreneurs, who typically subdivided properties into parcels of five acres, frequently subleasing to Japanese workers, who were required to sell their product to the leaseholders.

The next significant change for Kona was the advent of tourism, marked by the construction in 1928 of the area's first major hotel, the Kona Inn (Menton 1994). Starting in the 1960s, the area between Kailua and Keauhou became increasingly dominated by resort residential land use. The natural and cultural resources located along the coast were significantly impacted by an expanding tourism based economy and a growing population. To make way for new development projects and supporting infrastructure, cultural sites along the coast were often destroyed and only rarely preserved in situ.

In contrast, farming and cattle ranching dominated the inland areas, such as the project site. The Kona Producers Cooperative has been the master lessee since the building was built in 1993. The building was vacant for about a decade before it was occupied by the Food Basket as the primary tenant until 2017, when the Department of Agriculture returned.

Summary of Identification of and Impacts to Valued Natural, Cultural and Historical Resources

The project site is a fully graded and developed lot formerly farmed in coffee that is used for agricultural marshalling purposes. As part of the EA process, an effort was made to obtain information about any potential cultural properties and associated practices that might be present, or have taken place on the property. The Office of Hawaiian Affairs was contacted but did not supply any information relative to the existence of cultural properties or current use of the small project site for traditional and customary practices. No caves, springs, pu'u, native forest groves, gathering resources or other natural features are present on or near the project site. No natural vegetation exists that would be important for native gathering. As no resources or practices of a potential traditional cultural nature (i.e., landform, vegetation, etc.) appear to be present on or near the project site, and there is no evidence of any traditional gathering uses or other cultural practices, the proposed improvement of the marshalling yard would not appear to impact any culturally valued resources or cultural practices.

The Office of Hawaiian Affairs and the State Historic Preservation Division were supplied a link to the Draft EA, which may also be reviewed by other agencies and the general public, in order to help finalize the mitigation measures. No party reviewing the Draft EA supplied any additional cultural information relevant to project impacts.

3.2.3 Archaeology and Historic Properties

No historic properties including archaeological sites are known or expected to exist on or near the project site. As illustrated in Figures 2 and 3, the project site was modified for use as a marshalling yard in the 1980s has been fully graded. The 1993-vintage metal building has no historical significance. As such, no historic properties are present. In the unlikely event that archaeological resources are encountered during grading or construction, contract conditions will require that work in the immediate area of the discovery will be halted and the State Historic Preservation Division (SHPD) will be contacted as outlined in Hawai'i Administrative Rules 13§13-275-12. In order to assist in compliance with the Chapter 6e,

Hawai'i Revised Statutes (HRS) process, the State Historic Preservation Division (SHPD) was provided a link to a digital copy of the Draft EA for their comment on the presumed lack of archaeological resources and no effect to significant historic properties. No comment was received from SHPD. The Department of Agriculture will submit information concerning the Proposed Action to SHPD, if required, at the conclusion of the Draft EA comment period in order to advance review under Chapter 6e, HRS process.

3.3 Infrastructure

3.3.1 Utilities and Public Services

Existing Facilities and Services, Impacts and Mitigation Measures

Electrical power to the site is supplied by Hawaiian Electric, a privately owned utility company, via its island-wide distribution network, with poles and lines on Highway 11. Telephone service is supplied by Hawaiian Telcom. The Proposed Action involves upgrade of the electrical service capacity to accommodate additional load from new features. HELCO's pole-mounted transformer and incoming service conductors will be upgraded to provide an estimated 400 amps at 208volt/3phase. Both existing meters will be removed and replaced with a upgraded equipment. No effect on Hawaiian Electric's ability to service the area will occur.

The property is currently served by the Hawai'i County Department of Water Supply (DWS) with a 5/8-inch water meter connected to the existing 8-inch water main within Highway 11. The existing average usage as reported in records from October 2018 to August 2020 is 346 gallons per day (gpd), which does not exceed the 400 gpd allowable usage for this connection. The proposed improvements would increase the domestic water demand from one unit (400 gpd average) to three units. The project engineer has assessed the need to upgrade the existing connection to the DWS system to a 1 ½-inch lateral (to replace the existing one within the abandoned Old Honalo Road, TMK [3] 7-9-016:004), a 1-inch water meter, a 1-inch RP type backflow preventer, and a 1 ½-inch lateral from the backflow preventer to the building connections. In a letter in response to early consultation of July 19, 2021 (see Appendix 1a), DWS stated:

“The Department would request estimated maximum daily water usage calculations prepared by a professional engineer, licensed in the State of Hawai'i, for review. After review of the calculations, the Department will determine if water is available, a water commitment can be issued, the water commitment deposit amount, facilities charges due, water system improvements, and other conditions for final approval. Please be informed that the facility would require that there be 2,000 gallons per minute available at the site for fire protection. The existing water system in the area is inadequate to provide the required fire flow per the Department's Water System Standards. The Fire Department should be contacted to determine any other fire protection requirements or alternatives.

The Department of Agriculture will be supplying the requested information as part of final engineering and expects to receive the required additional water commitments.

There are currently no fire hydrants onsite or in the vicinity and the existing water main within Highway 11 is insufficiently sized to provide fire flow for the site. As such, the alternative water supply requirements from the Hawai'i County Fire Code are to be used. For a building area between 3,001 and 6,000 square feet, 24,000 gallons of water are required. The Proposed Action includes installation of a 24,000-gallon water tank with piping connected to two onsite fire hydrants for fire protection.

Wastewater is currently disposed of in an onsite cesspool located on the north side of the existing building. The permitted cesspool was constructed at the same time as the building, in 1993. It is composed of precast concrete rings with inside diameter of six feet and total depth of 20 feet below grade. To meet current regulations, the existing cesspool requires replacement with a new treatment system. The Department of Health does not regulate produce wash water, which has no chemical contaminants, so water will not be introduced to the wastewater collection system and will instead be directed to one of the existing onsite drywells. Due to the nature of the wastewater generated by this facility, advanced treatment (beyond a standard septic system) is expected to be required. Treatment requirements will vary depending on the strength of the wastewater, so sampling and testing will be required before a determination on the required treatment can be made. An aerated treatment unit (ATU) may be used if the biological oxygen demand (BOD) and total suspended solids (TSS) levels are within the 100-200 milligrams per liter (mg/L) range. An ATU system is estimated to require a 1,000-gallon tank with a 425 square foot absorption bed. The ATU system will be traffic-rated so that it may be placed within the parking area.

The mostly paved surface of the site generally drains from east to west, with swales along the north and west boundaries of the parking area that direct runoff to one of two drywells. The drywells function adequately but require cleaning, which will occur before or during project construction, and then periodically afterward.

The marshallling yard produces minimal solid waste that is handled through bi-weekly contracted pick-up of a 3-cubic yard dumpster bin. No increase in solid waste is expected. Discarded fruit cores and peels are a resource byproduct that is picked up by third parties who compost it at off-site locations. There is high demand for this product which will be accommodated by the increase in fruit production.

Fire, police and emergency services are available from stations in Kailua and Captain Cook, within 10 miles of the yard. No other public services are expected to be required.

In summary, the Proposed Action will require upgrades to various utilities but will not have impacts on any public utilities or services.

3.3.2 Roadways and Traffic

Existing Environment

The marshallling yard is accessed by a driveway on State Highway 11 at a location approximately one-half mile north of the intersection of Mamalahoa Highway and Highway 11 (see Figures 1 and 2b). The driveway is partially within parcel TMK (3) 7-9-016:019 (encumbered by the same Executive Order as the main property for use by the Department of Agriculture), and also within the abandoned Old Honalo

Road (TMK [3] 7-9-016:004). No improvements are planned for these sections of the driveway, which will not be affected by the proposed action. The yard is secured by a gate at the top of the driveway, which is locked when the facility is closed. In this area, Highway 11 is a two-lane highway with paved shoulders posted at 55 MPH. Various residential and farm driveways are present. There are currently 12 employees who usually make daily trips in and out of the yard. Typically, four produce delivery trucks enter and exit each day. The trucks typically arrive in the morning in two shifts, then depart in the afternoon in two shifts. Traffic in and out of the yard is thus very minimal.

Impacts and Mitigation Measures

When production is scaled by a factor of five, the amount of traffic will be no greater than the existing traffic, as the entering and exiting trucks will simply have fuller loads than currently. Currently only one or two pallets are placed on a truck; when production is scaled up, more pallets will be placed on the same truck. Although the weight and perhaps size of some vehicles used in the activities will increase, none will be oversize or overweight or near any legal limits. As there will be no additional traffic, a Traffic Impact Assessment is not required. No adverse impacts to pedestrian or bicycle safety on Highway 11 would occur.

In a letter in response to early consultation of July 15, 2021 (see Appendix 1a), the Hawai‘i State Department of Transportation (HDOT) stated:

- ... the DEA should include an explanation related to the site access to address the following:
- a. It appears that the site access is closely adjoining the access of the abutting lot. A discussion should be provided, based on the potential trip volumes relating to safety for entering/exiting both lots.
 - b. Please refer to the conditions for a Limited Access Boundary “A” dated 1-12-87 on Right-of-Way Map Hawaii Belt Road Federal Aid Project No. F-011-1(6) Inset B that read, “For “Kona Marshalling Yard” use only. (Secured by a locked gate or chain during periods of non-use).

Access to the two abutting lots to the west and north is via a separate driveway (see Figure 2b). There is no conflict for entry or exit between these two driveways, given the 40-foot separation and minimal traffic on both driveways. Immediately to the south of the yard, the course of the old Honalo Road has long been blocked and is now only a corridor for waterlines and does not provide access to any property (see Figure 2c). The marshalling yard is secured by a locked gate during periods of non-use. Facility managers located the gate at the entrance to the property, rather than the highway margin, to provide a safe location be offset from the highway for vehicles waiting to open and close the gate and for the mailbox and postal vehicles serving it. The location of the gate has no effects on access or traffic.

During movement of heavy equipment on or off the site, and at any times when there is a potential for project construction to impede traffic, professional traffic control will be utilized. Such activities will not occur during peak hour traffic for Highway 11 unless it is unavoidable.

As stated in Section 3.1.2, all additional stormwater runoff from the project site shall be managed and mitigated onsite.

3.4 Secondary and Cumulative Impacts

The Proposed Action will not involve any substantial secondary impacts, such as population changes or effects on public facilities. Cumulative impacts result when implementation of several projects that individually have limited impacts combine to produce more severe impacts or conflicts in mitigation measures. The Proposed Action will have only very limited impacts, all of them temporary and associated with the construction period, such as noise, traffic, dust and potential sedimentation.

Review of Chapter 343 documents in the *Environmental Notice* as well as press coverage indicates that there are a number of planned or ongoing projects in Kona in the 2021 to 2023 timeframe. Most major projects in the region are centered in the growing Kailua to Keahole area, five to ten miles north of the project site at the Honalo Marshalling Yard. These include improvements to Queen Ka'ahumanu Highway and related roads; Kona International Airport; administrative offices, energy facilities, aquaculture facilities and road construction at the Natural Energy Laboratory of Hawai'i (NELHA); various housing and community facility development at the Villages of La'i'ōpua and on Hina Lani Drive; homeless center improvements in the Old Kona Industrial Area; the Waiaha Transmission Waterline on Mamalahoa Highway; and the West Hawai'i Regional Park at Kealahou. All of these activities are located sufficiently far from the project site such there is negligible interaction potential for construction impacts. No major projects are known to be in planning for the immediate area. There does not appear to be any need for additional mitigation for cumulative construction-phase impacts, based on distance, scale and nature of other projects.

3.5 Required Permits and Approvals

The following permits and approvals would be required:

- Grading, Grubbing and Driveway Permits (County DPW)
- Building Permits and Plan Approval (County DPW and Planning)
- Chapter 6e, HRS, Determination from State Historic Preservation Division on Historic Property Effects
- Disability and Communication Access Board (DCAB) plan review and approval
- Approval of Water Meter And Related Infrastructure (County DWS)
- Wastewater System Approval (State DOH, Wastewater Branch)
- (Potential) Permit to Perform Work Upon State Highways (State DOT)
- (Potential) Permit for the Occupancy and Use of State Highway ROW (State DOT).

3.6 Consistency with Government Plans and Policies

3.6.1 Hawai'i State Plan

Adopted in 1978 and last revised in 1991 (Hawai'i Revised Statutes, Chapter 226, as amended), the Plan establishes a set of themes, goals, objectives and policies that are meant to guide the State's long-run growth and development activities. The three themes that express the basic purpose of the *Hawai'i State Plan* are individual and family self-sufficiency, social and economic mobility and community or social well-being. The Proposed Action would promote these goals by supporting and substantially enhancing

farmers' production of 'ulu and sweet potatoes, with no adverse environmental or social impacts, thereby enhancing quality-of-life and community and social well-being.

3.6.2 Hawai'i State Land Use Law

Hawai'i State Land Use District. All land in the State of Hawai'i is classified into one of four land use categories – Urban, Rural, Agricultural, or Conservation – by the State Land Use Commission, pursuant to Chapter 205, HRS. The property is in the State Land Use Agricultural District. The Proposed Action promotes agriculture and is consistent with intended uses for this Land Use District. In a letter in response to early consultation, the State Department of Land and Natural Resources, Hawai'i District Land Office, stated that the property "is currently encumbered under Executive Order No. 3503 to the Department of Agriculture for Marshalling Yard Purposes. The project described is consistent with the executive order."

3.6.3 Hawai'i County Zoning and Special Permit

The project site is County zoned A1-a (Agriculture, 1 acre minimum lot size). Among uses permitted by the current zoning code (Hawai'i County Code 25-5-72 (a) (2)) are "Agricultural products processing, major and minor." The continuation of the use as a marshalling yard would appear to be consistent with permitted uses in this zoning district. In any case, the property also obtained Special Permit (SP) #580 dated April 18, 1985, which was to "allow the establishment of a farm produce marshalling yard and related improvements." No change of zone or additional Special Permit is required for the project.

3.6.4 Hawai'i County General Plan and Kona CDP

The *General Plan* for the County of Hawai'i is a policy document expressing the broad goals and policies for the long-range development of the Island of Hawai'i. The plan was adopted by ordinance in 1989 and revised in 2005 (Hawai'i County Planning Department). The *General Plan* itself is organized into thirteen elements, with policies, objectives, standards, and principles for each. There are also discussions of the specific applicability of each element to the nine judicial districts comprising the County of Hawai'i. Most relevant to the Proposed Action are the following Goal and Policies, and Courses of Action of particular chapters of the General Plan:

HISTORIC SITES

6.2 GOALS

- (a) Protect, restore, and enhance the sites, buildings, and objects of significant historical and cultural importance to Hawai'i.
- (b) Appropriate access to significant historic sites, buildings, and objects of public interest should be made available.

Discussion: No historic properties including archaeological sites are known or expected to exist on or near the project site, as it was modified for use as a marshalling yard in the 1980s and has been fully graded. The 1993-vintage metal building has no historical significance. As such, no historic properties are present. In the unlikely event that archaeological resources are encountered during grading or construction, contract conditions will require that work in the immediate area of the discovery will be halted and the State Historic Preservation Division (SHPD) will be contacted as outlined in Hawai'i Administrative

Rules 13§13-275-12. The Department of Agriculture will submit information concerning the Proposed Action to SHPD, if required, at the conclusion of the Draft EA comment period in order to advance review under Chapter 6e, HRS process. Therefore the Proposed Action is not inconsistent with the relevant goals, policies, and courses of action for historic sites in Hawai‘i County.

NATURAL BEAUTY

7.2 GOALS

- (a) Protect, preserve and enhance the quality of areas endowed with natural beauty, including the quality of coastal scenic resources.
- (b) Protect scenic vistas and view planes from becoming obstructed.
- (c) Maximize opportunities for present and future generations to appreciate and enjoy natural and scenic beauty.

7.3 POLICIES

- (a) Increase public pedestrian access opportunities to scenic places and vistas.
- (d) Access easement to public or private lands that have natural or scenic value shall be provided or acquired for the public.
- (i) Do not allow incompatible construction in areas of natural beauty.

Discussion: The Proposed Action does not involve adverse impacts to scenic areas or vantages and would not affect the natural beauty of the Kona area. Therefore the action is consistent with relevant goals, policies, and courses of action of the Natural Beauty section of the Hawai‘i County General Plan.

FLOOD CONTROL

5.2 GOALS

- (a) Protect human life.
- (b) Prevent damage to man-made improvements.
- (c) Control pollution.
- (d) Prevent damage from inundation.
- (e) Reduce surface water and sediment runoff.
- (f) Maximize soil and water conservation.

5.3 POLICIES

- (a) Enact restrictive land use and building structure regulations in areas vulnerable to severe damage due to the impact of wave action. Only uses that cannot be located elsewhere due to public necessity and character, such as maritime activities and the necessary public facilities and utilities, shall be allowed in these areas.
- (g) Development-generated runoff shall be disposed of in a manner acceptable to the Department of Public Works and in compliance with all State and Federal laws.

5.4 STANDARDS

- (a) “Storm Drainage Standards,” County of Hawaii, October, 1970, and as revised.
- (b) Applicable standards and regulations of Chapter 27, “Flood Control,” of the Hawaii County Code.
- (c) Applicable standards and regulations of the Federal Emergency Management Agency (FEMA).
- (d) Applicable standards and regulations of Chapter 10, “Erosion and Sedimentation Control,” of the Hawaii County Code.

- (e) Applicable standards and regulations of the Natural Resources Conservation Service and the Soil and Water Conservation Districts.

Discussion: The entire property is within Zone X, or areas outside of the 500-year floodplain as determined by detailed methods in the Flood Insurance Rate Maps (FIRM). The Proposed Action will conform to applicable drainage regulations and policies of the County of Hawai‘i.

NATURAL RESOURCES

8.2 GOALS

- (a) Protect and conserve the natural resources from undue exploitation, encroachment and damage.
- (b) Provide opportunities for recreational, economic, and educational needs without despoiling or endangering natural resources.
- (c) Protect and promote the prudent use of Hawaii’s unique, fragile, and significant environmental and natural resources.
- (e) Protect and effectively manage Hawaii’s open space, watersheds, shoreline, and natural areas.

8.3 POLICIES

- (b) Encourage a program of collection and dissemination of basic data concerning natural resources.
- (h) Encourage public and private agencies to manage the natural resources in a manner that avoids or minimizes adverse effects on the environment and depletion of energy and natural resources to the fullest extent.
- (i) Encourage an overall conservation ethic in the use of Hawaii’s resources by protecting, preserving, and conserving the critical and significant natural resources of the County of Hawaii.
- (u) Ensure that activities authorized or funded by the County do not damage important natural resources.

Discussion: The Proposed Action does not involve destruction of natural resources and is consistent with the goals, standards and policies of the Natural Resources chapter of the Hawai‘i County General Plan.

LAND USE

14.2 GOALS

- (a) Designate and allocate land uses in appropriate proportions and mix and in keeping with the social, cultural, and physical environments of the County.
- (b) Protect and encourage the intensive and extensive utilization of the County’s important agricultural lands.

14.2.3 AGRICULTURE POLICIES

- (c) Assist other State agencies, such as the University of Hawaii, College of Tropical Agriculture and Human Resources, University of Hawaii at Hilo, College of Agriculture, Forestry and Natural Resources Management, Department of Business, Economic Development and Tourism, Office of Planning, Department of Land and Natural Resources and Department of Agriculture, on programs that aid agriculture.
- (e) Coordinate and encourage efforts to solve the problems of the agricultural industry in the County of Hawaii.
- (j) Ensure that development of important agricultural land be primarily for agricultural use.

(k) Support the development of private and State agricultural parks to make agricultural land available for agricultural activities.

Discussion: The Proposed Action would be highly consistent with all agricultural goals and policies and would provide important support for enhancement of farmers' production of 'ulu and sweet potatoes.

The *Hawai'i County General Plan Land Use Pattern Allocation Guide (LUPAG)*. The LUPAG map component of the *General Plan* is a graphic representation of the Plan's goals, policies, and standards as well as of the physical relationship between land uses. It establishes the basic urban and non-urban form for the County and identifies critical planned public and cultural facilities, public utilities and safety features, and transportation corridors. The project site is classified as Important Agricultural Lands in the LUPAG. Continuing use of the project site for a marshalling yard that supports and substantially enhances farmers' production of 'ulu and sweet potatoes is consistent with this designation.

Kona Community Development Plan

The Kona Community Development Plan (CDP) encompasses the judicial districts of North and South Kona, and was developed under the framework of the February 2005 County of Hawai'i General Plan. Community Development Plans are intended to translate broad General Plan Goals, Policies, and Standards into implementation actions as they apply to specific geographical regions around the County. CDPs are also intended to serve as a forum for community input into land-use, delivery of government services and any other matters relating to the planning area.

The General Plan now requires that a Community Development Plan shall be adopted by the County Council as an "ordinance," giving the CDP the force of law. This is in contrast to plans created prior to 2008, which were adopted by "resolution" and served only as guidelines or reference documents to decision-makers. The Kona CDP was adopted in September 2008 by the County Council.

The Plan has many elements and wide-ranging implications, but there are several major strategies that embody the guiding principles related to the economy, energy, environmental quality, flooding and other natural hazards, historic sites, natural beauty, natural resources and shoreline, housing, public facilities, public utilities, recreation, transportation and land use. One of the eight guiding principles of the Kona CDP is "7. Encourage a diverse and vibrant economy emphasizing agriculture and sustainable economies.... Agricultural lands should be preserved in a manner that supports family farms, ecotourism, and a self-sufficient agricultural economy that encourages the local use of Hawai'i products."

The CDP states:

Rural Area. Outside of the Kona Urban Area, the character of the rural areas should prevail. This means that limited future growth should be directed to the existing rural towns and villages in a way that revitalizes and enhances the existing rural lifestyle and culture of those communities. Outside of these towns and villages, the protection of important agricultural land is a priority objective. Protecting these lands requires regulations and incentives that will keep these lands available for agricultural use (p. 4-32).

The Proposed Action would preserve important agricultural land and further incentives for continued ‘ulu and sweet potato farming, helping preserve both the rural environment and the economic sustainability of the farmers who produce these crops.

PART 4: DETERMINATION

Based on the findings below, and upon consideration of comments to the Draft EA, the Hawai‘i State Department of Agriculture has determined that the proposed action will not significantly alter the environment, as impacts will be minimal, and has accordingly issued a Finding of No Significant Impact (FONSI).

PART 5: FINDINGS AND REASONS

Chapter 11-200.1-13, Hawai‘i Administrative Rules, outlines those factors agencies must consider when determining whether an Action has significant effects:

- (a) In considering the significance of potential environmental effects, agencies shall consider and evaluate the sum of effects of the proposed action on the quality of the environment.
- (b) In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected impacts, and the proposed mitigation measures. In most instances, an action shall be determined to have a significant effect on the environment if it may:

- (1) Irrevocably commit a natural, cultural, or historic resource;

No valuable natural or cultural resources would be committed or lost by the Proposed Action, which would not involve significant historic sites or native species or habitat. No cultural resource or practices on the site will be affected, and mitigation measures will reduce impacts to adjacent natural and cultural resources to minimal levels.

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

The Proposed Action expands and in no way curtails beneficial uses of the environment.

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

The State’s long-term environmental policies are set forth in Chapter 344, HRS. The broad goals of this policy are to conserve natural resources and enhance the quality of life. The Proposed Action is minor, environmentally beneficial, and fulfills aspects of these policies calling for an improved social environment by enhancing agricultural activities in a sustainable manner without causing environmental harm. It is thus consistent with all elements of the State’s long-term environmental policies.

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

The Proposed Action will benefit the social and economic welfare of the community and State by supporting 'ulu and sweet potato farming and processing.

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

The Proposed Action will not have any adverse effect on public health.

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

No secondary effects are expected to result from the Proposed Action, which does not expand facilities in such a way as to induce in-migration or unduly affect roads or other public facilities.

(7) Involve a substantial degradation of environmental quality;

The Proposed Action is minor and environmentally benign and would thus not contribute to environmental degradation with adherence to Best Management Practices.

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

The Proposed Action is not related to activities in the region in such a way as to produce adverse cumulative effects or involve a commitment for larger actions.

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

The project site is completely developed for agricultural marshall yard use and no rare, threatened or endangered plant species are present. Impacts to rare, threatened or endangered species of fauna will not occur, with planned restrictions of the timing of woody vegetation removal.

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

Slight increases in noise and effects to air quality will occur during construction, but they will be temporary and mitigated to non-significant levels. Sedimentation will be controlled through project BMPs developed as part of grading and engineering plans.

(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;

Although the Proposed Project is located in an area with volcanic and seismic risk, the entire Island of Hawai'i shares this risk. The Proposed Action is not imprudent to undertake and will employ design and construction standards appropriate to the seismic zone. The property is not located in a flood zone or any other hazardous area, and it would not affect any such area. Due to the elevation of the property at 1,300 feet above sea level, there is no risk to the Proposed Project from sea level rise. The Proposed Action has

adapted to climate change by accounting for the potential for larger storms, through minimizing hard surfaces that generate runoff in heavy rainfall, and by designing with adequate wind load to account for potentially greater storm winds.

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

The Proposed Action would not adversely impact any scenic sites or viewplanes.

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

Improvements to the buildings and facilities and new facility construction would involve unavoidable small but non-negligible carbon emissions. Continued marshaling activities would entail greenhouse gas emissions that would be essentially the same wherever the agricultural activities were taking place, likely leading to no net increase. The Proposed Project would not be expected to contribute significantly to global climate change.

For the reasons above, the Proposed Action would not have any significant effect in the context of Chapter 343, Hawai‘i Revised Statutes and section 11-200-12 of the State Administrative Rules.

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Honalo Marshalling Yard Improvements Environmental Assessment

APPENDIX 1a Comments in Response to Early Consultation

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Mitchell D. Roth
Mayor



Steven Ikaika Rodenhurst, P.E.
Director

Lee E. Lord
Managing Director

Stephen M. Pause, P.E.
Deputy Director

County of Hawai'i
DEPARTMENT OF PUBLIC WORKS
Aupuni Center
101 Pauahi Street, Suite 7 · Hilo, Hawai'i 96720-4224
(808) 961-8321 · Fax (808) 961-8630
public_works@hawaiicounty.gov

July 14, 2021

ATTN: RON TERRY
GEOMETRICIAN ASSOCIATES, LLC.
10 HINA STREET
HILO, HAWAII 96721
(via email to rterry@hawaii.rr.com)

SUBJECT: EARLY CONSULTATION FOR ENVIRONMENTAL ASSESSMENT FOR
HONALO MARSHALLING YARD IMPROVEMENTS PROJECT
NORTH KONA, ISLAND OF HAWAII, HAWAII
TMK: (3) 7-9-016:018

We have reviewed the request for early consultation for an Environmental Assessment dated June 17, 2021, and have the following comments:

1. All development generated runoff shall be disposed of on-site and shall not be directed toward adjacent properties. A drainage study shall be prepared by a licensed civil engineer and the recommended drainage system shall be constructed meeting the approval of the Department of Public Works.
2. All earthwork and grading activity shall conform to Chapter 10, Erosion and Sedimentary Control, of the Hawaii County Code.
3. The subject parcel is in an area designated as Zone X on the Flood Insurance Rate Map (FIRM) by the Federal Emergency Management Agency (FEMA). Zone X is an area determined to be outside the 500-year floodplain.

Should there be any questions concerning this matter, please contact Bryce Harada of our Engineering Division at (808) 961-8042.

FOR: ALAN K. THOMPSON, Division Chief
Engineering Division

BH



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

JADE T. BUTAY
DIRECTOR

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

IN REPLY REFER TO:
HWY-2863
HWY-PS 2.6110

July 15, 2021

VIA Email: rterry@hawaii.rr.com

Mr. Ron Terry
Principal
Geometrician Associates, LLC
10 Hina Street
Hilo, Hawaii 96720

Dear Mr. Terry:

Subject: Request for Comments
Environmental Assessment Early Consultation
Honalo Marshalling Yard Improvements
North Kona, Hawaii
Tax Map Key No.: (3) 7-9-016: 018

Thank you for your letter dated June 17, 2021, requesting for our early consultation on the preparation of a Draft Environmental Assessment (DEA) required by Chapter 343, Hawaii Revised Statutes, due to the use of State lands and funds.

The 1.9-acre site is owned by the Hawaii Department of Agriculture. The Honalo marshalling facility provides storage and crop processing for community farmers. The proposed request is for an expansion of the existing facility to substantially increase its daily crop production. The proposed work will include a new receiving building, kitchen addition, wash area renovation, and other miscellaneous expansions. The primary access for the site is directly on the Hawaii Belt Road; a State-owned highway (Route 11).

The Hawaii Department of Transportation has the following comments:

1. A full evaluation is required on whether the proposed expansion to the operation capacity and facility will have any direct or local impacts to the State's Hawaii Belt Road. This should be provided in the DEA and/or if relevant, a Traffic Assessment or a Traffic Impact Analysis Report should be included and prepared by a traffic engineer licensed in the State of Hawaii. The study should include any recommendations for mitigation measures to be implemented by the development.

Mr. Ron Terry
July 15, 2021
Page 2

HWY-PS 2.6110

2. The traffic study and the DEA should include an explanation related to the site access to address the following:
 - a. It appears that the site access is closely adjoining the access of the abutting lot. A discussion should be provided, based on the potential trip volumes relating to safety for entering/exiting both lots.
 - b. Please refer to the conditions for a Limited Access Boundary "A" dated 1-12-87 on Right-of-Way Map Hawaii Belt Road Federal Aid Project No. F-011-1(6) Inset B that read, "For "Kona Marshalling Yard" use only. (Secured by a locked gate or chain during periods of non-use)."

If you have any questions, please contact Jeyan Thirugnanam, Systems Planning Engineer, Highways Division, Planning Branch at (808) 587-6336 or by email at jeyan.thirugnanam@hawaii.gov. Please reference file review number PS 2021-106.

Sincerely,



EDWIN H. SNIFFEN
Deputy Director, Highways Division

Mitchell D. Roth
Mayor



Paul K. Ferreira
Police Chief

Kenneth Bugado Jr.
Deputy Police Chief

County of Hawai'i

POLICE DEPARTMENT

349 Kapi'olani Street • Hilo, Hawai'i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

July 9, 2021

Mr. Ron Terry
Principal
Geometrician Associates, LLC
10 Hina Street
Hilo, HI 96720

Dear Mr. Terry:

**SUBJECT: EARLY CONSULTATION FOR ENVIRONMENTAL ASSESSMENT FOR HONALO
MARSHALLING YARD IMPROVEMENTS PROJECT, TMK (3RD) 7-9-016: 018,
NORTH KONA DISTRICT, ISLAND OF HAWAII**

The above-referenced Consultation for Environmental Assessment for Honalo Marshalling Yard Improvements Project has been reviewed, and we offer no comments at this time.

Should you have any questions, please contact Captain Gilbert Gaspar Jr., Commander of the Kona District, at 326-4646, extension 299.

Sincerely,

Kenneth Bugado, Jr.
for

PAUL K. FERREIRA
POLICE CHIEF

GG/jaj
21HQ0583

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

July 19, 2021

Geometrician Associates, LLC
Attention: Mr. Ron Terry
P.O. Box 396
Hilo, Hawaii 96721

via email: rterry@hawaii.rr.com

Dear Mr. Terry:

SUBJECT: Early Consultation for Environmental Assessment for **Honalo Marshalling Yard Improvements Project** located at Honalo, North Kona, Island of Hawaii; TMK: (3) 7-9-016:018 on behalf of the State Department of Agriculture

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division-Hawaii District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosures
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

June 21, 2021

FROM:

MEMORANDUM

TO:

DLNR Agencies:

- ☐ Div. of Aquatic Resources
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- ☐ Div. of State Parks
- ☒ Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- ☐ Office of Conservation & Coastal Lands
- ☒ Land Division – Hawaii District (gordon.c.heit@hawaii.gov)

TO:

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
SUBJECT: Early Consultation for Environmental Assessment for **Honalo Marshalling Yard Improvements Project**
LOCATION: Honalo, North Kona, Island of Hawaii; TMK: (3) 7-9-016:018
APPLICANT: Geometrician Associates, LLC on behalf of the State Department of Agriculture

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **July 16, 2021**.

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

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

Signed:

Print Name:

Carty S. Chang, Chief Engineer

Division:

Engineering Division

Date:

Jul 9, 2021

Attachments

cc: Central Files

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/Russell Y. Tsuji

**Ref: Early Consultation for Environmental Assessment for Honalo Marshalling
Yard Improvements Project**

Location: Honalo, North Kona, Island of Hawaii

TMK(s): (3) 7-9-016:018

**Applicant: Geometrician Associates, LLC on behalf of the State Department of
Agriculture**

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.hawaiiinfip.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.

The applicant should include water demands and infrastructure required to meet project needs. Please note that all State projects requiring water service from their local Department/Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.

The applicant is required to provide water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update projections.

Signed: _____


CARTY S. CHANG, CHIEF ENGINEER

Date: Jul 9, 2021

7/8/21

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

June 21, 2021

MEMORANDUM

TO: **DLNR Agencies:**
____ Div. of Aquatic Resources
____ Div. of Boating & Ocean Recreation
X Engineering Division (DLNR.ENGR@hawaii.gov)
X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
____ Div. of State Parks
X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
____ Office of Conservation & Coastal Lands
X Land Division – Hawaii District (gordon.c.heit@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*

SUBJECT: Early Consultation for Environmental Assessment for **Honalo Marshalling Yard Improvements Project**

LOCATION: Honalo, North Kona, Island of Hawaii; TMK: (3) 7-9-016:018

APPLICANT: Geometrician Associates, LLC on behalf of the State Department of Agriculture

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **July 16, 2021**.

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

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

Signed: _____

Print Name: _____

Division: _____

Date: _____

Gordon C. Heit
GORDON C. HEIT
Land Division
7/8/2021

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**

75 Aupuni Street, Room 204
Hilo, Hawaii 96720
PHONE: (808) 961-9590
FAX: (808) 961-9599

July 8, 2021

MEMORANDUM

TO: Russell Y. Tsuji, Administrator

FROM: Gordon C. Heit, Hawaii District Land Agent 

SUBJECT: Early Consultation for Environmental Assessment for Honalo Marshalling Yard Improvements Project

LOCATION: Honalo, North Kona, Island of Hawaii,
TMK: (3) 7-9-016:018

APPLICANT: State of Hawaii, Department of Agriculture

Pursuant to your request for comments on the above matter, we offer the following:

The property identified by TMK: (3) 7-9-016:018 is currently encumbered under Executive Order No.'s. 3503 to the Department of Agriculture for Marshalling Yard Purposes. The project described is consistent with the executive order and the Hawaii District Land Office has no objection to the proposed project.

Please contact me should you have any questions.



Encumbrance Detail for eo3503

Data reported by DLNR-LD

Lessor Agency:	DLNR-LD	Commencement Date:	2/13/1991
Lessee:	DOA	Annual Rent:	\$0.00
Type:	EO		
Subtype:	Executive Order		
Acreage:	2.0350		
Updated:	5/19/2016		
Description:	No. Kona Marshalling Yard		
User Notes:	EOs issued for No. Kona Marshalling Yard: 3503		

Encumbered Parcels

Fee Owner	TMK	Relation to TMK	Trust Land Status	Parcel Acreage
DLNR	(3) 7-9-016:018		Acquired after 8/59	1.9100
DLNR	(3) 7-9-016:019		Undetermined	0.1250

The content within the PLTIS, including maps and data, has been collected from multiple city, county, and state sources, and may not have been prepared for legal, engineering, or surveying purposes. Users of this content should consult the primary data sources to ascertain the accuracy and usability of the data. Data shall not be sent to third-parties without consulting with the source agency(s).



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

345 KEKŪANAŌ'A STREET, SUITE 20 • HILO, HAWAII 96720
TELEPHONE (808) 961-8050 • FAX (808) 961-8657

July 19, 2021

Mr. Ron Terry
Geometrician Associates, LLC
P.O. Box 396
Hilo, HI 96721

Dear Mr. Terry:

**Subject: Pre-Environmental Assessment for Honalo Marshalling Yard Improvements Project
North Kona District, Island of Hawai'i
Tax Map Key (3) 7-9-016:018**

This is in response to your Pre-Environmental Assessment letter dated June 17, 2021.

Please be informed that there is an existing 8-inch waterline along Māmalahoa Highway fronting the adjacent Parcel 7-9-016:005. The Department would request estimated maximum daily water usage calculations prepared by a professional engineer, licensed in the State of Hawai'i, for review. After review of the calculations, the Department will determine if water is available, a water commitment can be issued, the water commitment deposit amount, facilities charges due, water system improvements, and other conditions for final approval.

Please be informed that the facility would require that there be 2,000 gallons per minute available at the site for fire protection. The existing water system in the area is inadequate to provide the required fire flow per the Department's Water System Standards. The Fire Department should be contacted to determine any other fire protection requirements or alternatives.

Should there be any questions, please contact Mr. Ryan Quitoriano of our Water Resources and Planning Branch at 961-8070, extension 256.

Sincerely yours,

Keith K. Okamoto, P.E.
Manager-Chief Engineer

RQ:dfg

... Water, Our Most Precious Resource ... Ka Wai A Kāne ...

The Department of Water Supply is an Equal Opportunity provider and employer.

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Honalo Marshalling Yard Improvements Environmental Assessment

APPENDIX 1b Comments to Draft EA and Responses

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Mitchell D. Roth
Mayor

Lee E. Lord
Managing Director



Kazuo S. K. L. Todd
Fire Chief

Eric H. Moller
Deputy Fire Chief

County of Hawai'i
HAWAI'I FIRE DEPARTMENT
25 Aupuni Street • Suite 2501 • Hilo, Hawai'i 96720
(808) 932-2900 • Fax (808) 932-2928

October 12, 2021

Geometrician Associates
10 Hina Street
Hilo, Hawai'i 96720

Dear Mr. Terry:

SUBJECT: Draft Environmental Assessment and Anticipated Finding of No Significant Impact
Honalo Marshalling Yard Improvements, North Kona, Hawai'i
TMK: (3) 7-9-016:018

We are in receipt of your letter dated September 22, 2021 in regards to an Environmental Assessment and Anticipated finding of no significant Impact for the above listed subject.

The Hawai'i Fire Department has no findings of hazardous fuels, chemicals or incidents with regards to the request for Environmental Assessment.

If you should have any questions, please feel free to contact my office at (808) 932-2911.

Mahalo,

A handwritten signature in black ink, appearing to read "Kazuo S. K. L. Todd".

KAZUO S. K. L. TODD
Fire Chief

KT/kv

cc: Janice Fujimoto, Engineering Section Head via email



DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

November 24, 2021

Kazuo S.K.L Todd, Fire Chief
Hawai'i Fire Department
25 Aupuni Street, Suite 2501
Hilo HI 96720

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Chief Todd:

Thank you for your comment letter dated October 12, 2021, regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements. We appreciate the information you provided concerning the lack of records for hazardous fuels, chemicals, or incidents. This matches our records.

We very much appreciate your review of the document. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

Sincerely,

Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates



P. O. Box 589
Kealahou, HI 96750
October 10, 2021

Re: Project Name: Honalo Marshalling Yard Improvements
Island: Hawaii
District: North Kona
TMK: (3) 7-9-016: 018

Proposing/Determining Agency
Ms. Janice Fujimoto
Engineering Section Head
Hawaii's State Department of Agriculture
1428 S. King Street
Honolulu, HI 96814

Dear Ms. Fujimoto:

This letter is in response to the Environmental Assessment notice for the above location we received.

I am part owner and live on the north side of the above property. We currently experiencing foul odor coming from the above property when the current tenant is doing some sort of processing near my property boundary. The odor can also be smelled by the people living in the area as well. Excess waste water seeping into the soil. At one point, the current tenant was draining water from their potato machine which was then draining onto my property through the stonewall, down my driveway then into my coffee land. This was never a problem when the Food Bank was a tenant at the above property.

Your assistance in immediately correcting this matter is appreciated.

Very truly yours,



Maurice Kameda

jk

cc: ✓ Ron Terry
Geometrician Associates
10 Hina Street
Hilo, HI 96720

cc: Clifford Kameda
19 Elliott Lane
Stafford, VA 22554

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

November 24, 2021

Maurice Kameda
PO Box 589
Kealahou HI 96750

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Mr. Kameda:

Thank you for your comment letter regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements. You stated that you are a neighbor who has experienced both a foul odor and excess wastewater draining from the property seeping into your land. First, please accept our apology for this inconvenience. We immediately requested the site managers to address what they could, at this point by cleaning the drywell of any organic matter and also removing organic matter along the side of the parking lot. They have accomplished some of that and should complete it soon. We believe this will largely solve the odor issue. If it continues to affect you, please contact me and we will investigate it further and try to resolve the problem.

Some of the improvements in the project are meant to accomplish long-term prevention of both odor and drainage problems. Currently all process water flows into either the cesspool or drywell without any treatment. Part of the project involves upgrading the existing cesspool to a wastewater treatment system regulated by the Department of Health in conformance with this agency's rules. No organics will be directed to the drywell, so this source of the odor will be fully mitigated.

Again, we apologize for this inconvenience and very much appreciate your review of the document. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

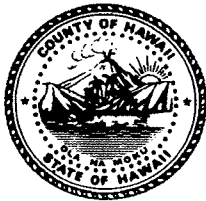
Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Saiki".

Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates

Mitchell D. Roth
Mayor



Paul K. Ferreira
Police Chief

Kenneth Bugado Jr.
Deputy Police Chief

County of Hawai`i

POLICE DEPARTMENT

349 Kapi`olani Street • Hilo, Hawai`i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

September 30, 2021

Mr. Ron Terry
Principle
Geometrician Associates, LLC
10 Hina Street
Hilo, Hawaii 96720

Dear Mr. Terry:

**SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (DEA) AND ANTICIPATED FINDING OF NO
SIGNIFICANT IMPACT (FONSI) FOR THE HONALO MARSHALLING YARD
IMPROVEMENTS PROJECT**

This is in response to your letter received on September 22, 2021 regarding the Honalo Marshalling Yard Improvements Project.

Thank you for allowing the Hawai'i Police Department to participate; however, at this time we offer no comments.

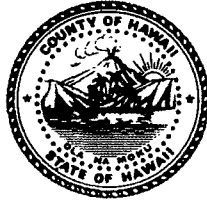
Should you have any questions, please contact Captain Gilbert Gaspar Jr., Commander of the Kona District, at 326-4646, extension 299.

Sincerely,

PAUL K. FERREIRA
POLICE CHIEF

GG/jaj
21HQ0583

Mitchell D. Roth
Mayor



Paul K. Ferreira
Police Chief

Kenneth Bugado, Jr.
Deputy Police Chief

County of Hawai'i

POLICE DEPARTMENT

349 Kapi'olani Street • Hilo, Hawai'i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

October 20, 2021

Mr. Ron Terry
Geometrician Associates
10 Hina Street
Hilo, HI 96720

Dear Mr. Terry:

SUBJECT: PROJECT NAME: HONALO MARSHALLING YARD IMPROVEMENTS
ISLAND: HAWAII
DISTRICT: NORTH KONA
TMK: (3) 7-9-016: 018

This is in response to your letter received on October 8, 2021 regarding the Honalo Marshalling Yard Improvements.

Thank you for allowing the Hawai'i Police Department to participate, however, at this time we offer no comments.

Should you have any questions, please contact Captain Gilbert Gaspar Jr., Commander of the Kona District, at 326-4646, extension 299.

Sincerely,

PAUL K. FERREIRA
POLICE CHIEF

#4
CHAD BASQUE
ASSISTANT POLICE CHIEF
AREA II OPERATIONS

GG/jaj
21HQ0583

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

November 24, 2021

Paul K. Ferreira, Chief
Hawai'i County Police Department
349 Kapiolani Street
Hilo HI 96720-3998

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Chief Ferreira:

Thank you for your comment letters dated September 30 and October 20, 2021, regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements, stating that you did not have any comments at this time.

We very much appreciate your review of the document. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Saiki".

Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates





UNIVERSITY
of HAWAII
MANOA

Director, Agriculture
Office of the Director

October 25, 2021

Via email:

State of Hawai'i, Department of Agriculture
1428 S. King Street
Honolulu, HI 96814

Attention: Ms. Janice Fujimoto (Janice.fujimoto@hawaii.gov)

Re: Honalo Marshalling Yard Improvements Draft Environmental Assessment (AFNSI)
TMK: (3rd) 7-9-016:018
North Kona District, Hawai'i Island

Dear Ms. Fujimoto:

Thank you for the opportunity to comment on the draft environmental assessment for the proposed Honalo Marshalling Yard Improvements project (published October 8, 2021), specifically with respect to issues and concerns regarding light pollution.

The University of Hawai'i Institute for Astronomy (IfA) conducts research in astronomy using telescopes located on Haleakalā and Maunakea and operated by IfA and our partner institutions. Both Haleakalā and Maunakea are among the best sites in the world for astronomical facilities because of their elevation, clear skies, favorable atmospheric conditions, and low levels of light pollution. Hawai'i-based observatories have played major roles in the advancement of astronomy and astrophysics for over 50 years and are well positioned to remain at the forefront of astronomical research for decades to come.

Because of the outstanding quality and productivity of these facilities, IfA is acutely concerned about negative impacts on astronomy from increased light pollution. Our work to combat light pollution has also brought us into contact with others concerned about light pollution for other reasons, including impacts on wildlife (particularly seabirds) and on human health. While IfA's comments focus on the impacts of light pollution on astronomy, appropriate mitigation measures also help to reduce non-astronomy impacts.

With that background, we offer the following comments:

Any new or additional artificial light at night has an adverse effect on astronomical observations by increasing the night sky brightness. Nearly all observations performed by the telescopes on Maunakea are sky-background limited. This means that there is a natural sky brightness coming

from airflow and zodiacal light. Artificial light increases the sky brightness, thereby decreasing the sensitivity of the telescopes.

Lights can have an adverse effect on astronomical observations by incrementally increasing the night sky brightness, effectively making the telescope smaller and less sensitive.

IfA appreciates the DEA's discussion of the need to comply with the Hawai'i County lighting ordinance to protect observatories, seabirds, and other resources. Consistent with that discussion, appropriate steps to reduce the impact on the observatories include:

1. Conformity to standards established by the Hawai'i County lighting ordinance should include any future updates. All lighting should be fully shielded. This means that all lighting fixtures must emit zero light above the horizontal plane.
2. The minimum possible amount of outdoor lighting should be used, and should be turned off when not needed. Motion sensor activated lighting is strongly preferred wherever feasible. Blue light is most harmful to the observatories, so blue-deficient lighting should be exclusively selected. The best choices are filtered LED lights, or amber LED lights. Under no circumstances should high-intensity discharge lamps such as metal halide be used; fluorescent lights also must be avoided. Both of these types of lamps use mercury and emit light at wavelengths that is very damaging to astronomy.
3. White light should be avoided because the blue component of white light is very damaging to astronomy. White light should always have a Correlated Color Temperature of 2700 K or below.

Thank you for your consideration of these comments and attention to IfA's concerns. If you have questions or need further detail regarding these comments, please do not hesitate to contact the undersigned or Richard Wainscoat (rjw@hawaii.edu).

Very truly yours,



Doug Simons
Director

cc: Mr. Ron Terry, Geometrician Associates, LLC (rterry@hawaii.rr.com)

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

November 24, 2021

Doug Simons, Director
University of Hawai'i Institute for Astronomy
2680 Woodlawn Drive
Honolulu HI 96822

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Dr. Simons:

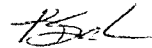
Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements, in which you state that the Institute for Astronomy (IfA) is acutely concerned about negative impacts on astronomy from increased light pollution. To address your individual points:

1. *Conformity to standards established by the Hawai'i County lighting ordinance should include any future updates. All lighting should be fully shielded. This means that all lighting fixtures must emit zero light above the horizontal plane. As stated in Sections 3.1.4 and 3.1.5, all improvements will be fully conformant with the ordinance.*
2. *The minimum possible amount of outdoor lighting should be used and should be turned off when not needed. Motion sensor activated lighting is strongly preferred wherever feasible. Blue light is most harmful to the observatories, so blue-deficient lighting should be exclusively selected. The best choices are filtered LED lights, or amber LED lights. Under no circumstances should high-intensity discharge lamps such as metal halide be used; fluorescent lights also must be avoided. Project lighting will conform to these specifications.*
3. *White light should be avoided because the blue component of white light is very damaging to astronomy. White light should always have a Correlated Color Temperature of 2700 K or below. As stated above, all lighting will be blue-deficient LED and will have a CCT of 2700 K or less if fixtures are feasible and available.*

Mr. Douglas Simmons
November 24, 2021
Page 2 of 2

We very much appreciate your review of the document. We understand the IfA's goals of reducing light pollution and are striving to accommodate them as much as possible consistent with keeping our facilities safe and secure. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

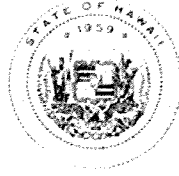
Sincerely,



Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates

DAVID Y. IGE
GOVERNOR



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

JADE T. BUTAY
DIRECTOR


Deputy Directors
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

IN REPLY REFER TO:
HWY-2896
HWY-PS 2.6833

October 25, 2021

VIA EMAIL: janice.fujimoto@hawaii.gov

TO: JANICE FUJIMOTO
ENGINEERING SECTION HEAD
DEPARTMENT OF AGRICULTURE

FROM: EDWIN H. SNIFFEN 
DEPUTY DIRECTOR, HIGHWAYS DIVISION

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT
HONALO MARSHALLING YARD IMPROVEMENTS
NORTH KONA, HAWAII
TAX MAP KEY NO. 3-7-9-016:018

Thank you for requesting the Hawaii Department of Transportation (HDOT) comments on the Draft Environmental Assessment (EA) regarding the proposed Honalo Marshalling Yard Improvements in North Kona, Hawaii. The 1.9-acre project site, identified as Tax Map Key No. 3-7-9-016:018 and is encumbered by Executive Order 3503 that designates the Department of Agriculture, the managing agency for leasing the land for use as an agricultural marshalling yard. Currently, the site is leased to Kona Producers Cooperative and subleased to the Hawaii Ulu Cooperative to process breadfruit (ulu). The site has operated as a marshalling yard since 1984.

Improvements to the site are proposed to facilitate a five-fold increase in ulu production. The site access driveway is on Kuakini Highway (State Route 11), a principal arterial. On the HDOT right-of-way (ROW) maps, the driveway is designated "Limited Access" specific for agricultural marshalling yard use. The access gate is locked when the facility is closed, as a condition of the Limited Access. The gate is setback from Kuakini Highway ROW to provide a safe distance for temporarily parking the gate keeper's vehicle.

The HDOT reviewed and provided comments (July 15, 2021) on the project's Early Consultation materials. Thank you for addressing our comments in the Draft EA. The HDOT has the following comments on the Draft EA, relevant to State highways:

1. The Draft EA states that there would be no additional truck trips associated with the increase in production. The trucks would haul heavier loads. The site generates four truck trips and twelve employee vehicle trips per day.

The HDOT concurs a traffic assessment prepared by a traffic engineer is not warranted because there would be no change to the existing minor trip generation.

2. Although there would be no change in site traffic, it appears the HDOT does not have record of issuing a permit for construction of the existing site driveway on Kuakini Highway. Submit as-built construction drawings to Mr. Harry Takiue, Hawaii District Engineer at the following address:

Hawaii State Department of Transportation, Highways Division
Hawaii District
50 Makaala Street
Hilo, Hawaii 96720

Identify the boundaries of the neighboring driveway on the drawings.

3. The site driveway appears to be within parcel Tax Map Key No. 3-7-9-016:019, which is also encumbered by the Executive Order.

The site driveway also appears to be within the abandoned Old Honalo Road Tax Map Key No. 3-7-9-016:004 parcel, which is aligned along the southern boundary of the site. The alignment separates the two encumbered parcels of the site and intersects with Kuakini Highway.

Verify these two additional parcels which are included in the project site and edit the Final EA project description, as appropriate.

4. No additional discharge of surface water runoff onto the Kuakini Highway ROW is permitted. This includes the use of existing State drainage culverts and channels. Clearly state in the Final EA that all additional stormwater runoff from the project site shall be managed and mitigated onsite.
6. Consult directly with the HDOT Hawaii District Engineer at (808) 933-8866 regarding the applicability of the following HDOT permits and update the Final EA list of permits and approvals, as needed:
 - a. Permit to Perform Work Upon State Highways is required for any work within the State highway ROW. This permit may be applicable to the utility upgrades proposed. The application includes the HDOT review and approval of construction drawings and a Traffic Management Plan.
 - b. Permit to Operate or Transport Oversize and/or Overweight Vehicles and Loads Over State highways.

- c. Permit for the Occupancy and Use of State highway ROW.

If you have any questions, please contact Jeyan Thirugnanam, Systems Planning Engineer, Highways Division, Planning Branch at (808) 587-6336 or by email at jeyan.thirugnanam@hawaii.gov. Please reference file review number PS 2021-166.

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

November 24, 2021

Edwin H. Sniffen, Deputy Director
Department of Transportation, Highways Division
869 Punchbowl Street
Honolulu HI 96813-5097

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Mr. Sniffen:

Thank you for your comment letter dated October 25, 2021, regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements. We appreciate your systematic comparison of the comments from your early consultation letter and their disposition in the analysis in the Draft EA. We concur with your assessments. This response will focus on those enumerated items that pose additional questions or concerns. In answer to your specific comments:

1. *(No. 2 in your letter). HDOT does not have record of issuing a permit for construction of the existing site driveway on Kuakini Highway. Submit as-built construction drawings to Mr. Harry Takiue, Hawaii District Engineer. The driveway appears to have been constructed in the 1980s. The project engineer in coordination with the Department of Agriculture will continue to investigate whether and when a permit was obtained and will also prepare to submit as-built drawings to the District Engineer.*
2. *(No. 3 in your letter) The site driveway appears to be within parcel Tax Map Key No. 3-7-9-016:019, which is also encumbered by the Executive Order. The site driveway also appears to be within the abandoned Old Honalo Road Tax Map Key No. 3-7-9-016:004 parcel, which is aligned along the southern boundary of the site. The alignment separates the two encumbered parcels of the site and intersects with Kuakini Highway. Verify these two additional parcels which are included in the project site and edit the Final EA project description, as appropriate. The Honalo Marshalling Yard does comprise these three parcels, but only Parcel 18 has any proposed improvements or is materially affected by the proposed action and is thus a part of the project site action for the purposes of the EA. In deference to*

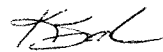
your comment, we have added for context to the EA a mention of these unaffected access properties.

3. *(No. 4 in your letter) No additional discharge of surface water runoff onto the Kuakini Highway ROW is permitted, including State drainage culverts and channels. Clearly state in the Final EA that all additional stormwater runoff from the project site shall be managed and mitigated onsite.* This is already clearly stated on page 12 of the EA, which deals with drainage. In deference to your comment, we have added the statement you suggest in Section 3.2.2 (Roads and Traffic).
4. *(No. 6 in your letter – note: your letter does not contain a No. 5) Consult directly with the HDOT Hawaii District Engineer at (808) 933-8866 regarding the applicability of the following HDOT permits and update the Final EA list of permits and approvals, as needed:*
 - a. *Permit to Perform Work Upon State Highways is required for any work within the State highway ROW. This permit may be applicable to the utility upgrades proposed. The application includes the HDOT review and approval of construction drawings and a Traffic Management Plan.*
 - b. *Permit to Operate or Transport Oversize and/or Overweight Vehicles and Loads Over State highways.*
 - c. *Permit for the Occupancy and Use of State highway ROW.*

During the final design phase of the project, the project engineer will consult with the HDOT Hawaii District Engineer concerning the need for any new permits. At this time, no actions are proposed in the State highway ROW. No elements of the utility upgrades currently appear to involve use or occupancy of State highway ROW. However, in deference to your comment, the Final EA includes in the list of permits “a” and “c” above as potential permits. Although the weight and perhaps size of some vehicles used in the activities will increase, none will be oversized or overweight or near any legal limits. This information has been added to the Final EA.

We very much appreciate your review of the document. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

Sincerely,



Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates

From: Cab General <Cab.General@doh.hawaii.gov>
Sent: Friday, November 5, 2021 2:22 PM
To: Fujimoto, Janice <Janice.Fujimoto@hawaii.gov>; rterry@hawaii.rr.com
Subject: Honalo Marshalling Yard Improvements--Draft EA (AFNSI)

Aloha

Thank you for the opportunity to provide comments on the subject project.
Please see our standard comments at:

<https://health.hawaii.gov/cab/files/2019/08/Standard-Comments-Clean-Air-Branch-2019.pdf>

Please let me know if you have any Questions

Lisa M.M. Wallace
EHS QA Officer
Clean Air Branch
Environmental Health Office
Hilo, Hawaii 96720

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

November 24, 2021

Lisa M.M. Wallace
EHS QA Officer
Clean Air Branch
Hawai'i State Department of Health
Cab.General@doh.hawaii.gov

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Ms. Wallace:

Thank you for your comment email dated November 5, 2021, regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements, in which you provided reference to DOH-CAB standard comments at:
<https://health.hawaii.gov/cab/files/2019/04/Standard-Comments-CleanAir-Branch-2019.pdf>

We reviewed the standard comments as part of the EA preparation. As discussed in Section 3.1.5 of the EA, due to the minor scale of improvements, the Proposed Action would not measurably affect air quality, except temporarily and minimally during construction; dust will be strictly controlled through BMPs. Our Department will ensure that construction work and renovation is conducted in a manner protective of the air quality for site workers, the public, facility users, and the environment.

We very much appreciate your review of the document. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

Sincerely,

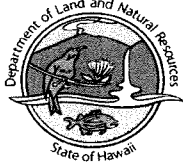
A handwritten signature in black ink, appearing to read "K. Saiki".

Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates



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

November 8, 2021

State of Hawaii
Department of Agriculture
Attention: Ms. Janice Fujimoto
Engineering Section Head
1428 S. King Street
Honolulu, Hawaii 96814

via email: janice.fujimoto@hawaii.gov

Dear Ms. Fujimoto:

SUBJECT: Draft Environmental Assessment for the Proposed **Honalo Marshalling Yard Improvements** located at North Kona, Island of Hawaii; TMK: (3) 7-9-016:018 on behalf of Hawaii State Department of Agriculture

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division-Hawaii District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosures

cc: Central Files
Geometrician Associates, LLC (w/copies)
Attention: Mr. Ron Terry (via email: rterry@hawaii.rr.com)

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

October 14, 2021

MEMORANDUM

FROM:

~~TO:~~

DLNR Agencies:

- ☐ Div. of Aquatic Resources
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- ☐ Div. of State Parks
- ☒ Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- ☐ Office of Conservation & Coastal Lands
- ☒ Land Division – Hawaii District (gordon.c.heit@hawaii.gov)

TO:

FROM:

Russell Y. Tsuji, Land Administrator *Russell Tsuji*

SUBJECT:

Draft Environmental Assessment for the Proposed **Honalo Marshalling Yard Improvements**

LOCATION:

North Kona, Island of Hawaii; TMK: (3) 7-9-016:018

APPLICANT:

Geometrician Associates, LLC on behalf of Hawaii State Department of Agriculture

Transmitted for your review and comment is information on the above-referenced subject matter. The DEA was published on October 8, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice, available at the following link:

http://oegc2.doh.hawaii.gov/The_Environmental_Notice/2021-10-08-TEN.pdf

Please submit any comments by **November 5, 2021**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

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

Signed:

Print Name:

Carty S. Chang, Chief Engineer

Division:

Engineering Division

Date:

Oct 29, 2021

Attachments

cc: Central Files

10/27/21

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

October 14, 2021

MEMORANDUM

TO: **DLNR Agencies:**
___ Div. of Aquatic Resources
___ Div. of Boating & Ocean Recreation
X Engineering Division (DLNR.ENGR@hawaii.gov)
X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
___ Div. of State Parks
X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
___ Office of Conservation & Coastal Lands
X Land Division – Hawaii District (gordon.c.heit@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*

SUBJECT: Draft Environmental Assessment for the Proposed **Honalo Marshalling Yard Improvements**

LOCATION: North Kona, Island of Hawaii; TMK: (3) 7-9-016:018

APPLICANT: Geometrician Associates, LLC on behalf of Hawaii State Department of Agriculture

Transmitted for your review and comment is information on the above-referenced subject matter. The DEA was published on October 8, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice, available at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2021-10-08-TEN.pdf

Please submit any comments by **November 5, 2021**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- ☒ We have no objections.
- ☐ We have no comments.
- ☐ We have no additional comments.
- ☐ Comments are included/attached.

Signed: _____

Print Name: _____

Division: _____

Date: _____

Gordon C. Heit
GORDON C. HEIT
Land Division
10/28/21

Attachments

cc: Central Files

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

November 24, 2021

Russell Y. Tsuji, Land Administrator
Hawai'i DLNR Land Division
P.O. Box 621
Honolulu, Hawaii 96809

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Mr. Tsuji:

Thank you for your letter dated November 8, 2021, transmitting comments from various divisions of Department of Land and Natural Resources (DLNR) regarding the Draft Environmental Assessment (EA) for the Honalo Marshalling Yard Improvements. We hereby acknowledge the *no-additional comments* or *no-objections* from Hawai'i Island Land Division and the Engineering Division.

We very much appreciate your circulating the EA for review by DLNR agencies. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 969-7090 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

Sincerely,

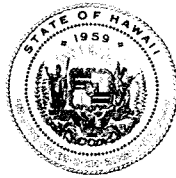
A handwritten signature in black ink, appearing to read "Kirk Saiki".

Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates



DAVID Y. IGE
GOVERNOR OF HAWAII



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

VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
EMD/CWB

05023PDCL.18

May 10, 2018

MEMORANDUM

SUBJECT: Clean Water Branch Standard Project Comments

TO: Agencies and Project Owners

FROM: ALEC WONG, P.E., CHIEF *Alec Wong*
Clean Water Branch

This memo is provided for your information and sharing. You are encouraged to share this memo with your project partners, team members, and appropriate personnel.

The Department of Health (DOH), Clean Water Branch (CWB) will no longer be responding directly to requests for comments on the following documents (Pre-consultation, Early Consultation, Preparation Notice, Draft, Final, Addendums, and/or Supplements):

- Environmental Impact Statements (EIS)
- Environmental Assessments (EA)
- Stream Channel Alteration Permits (SCAP)
- Stream Diversion Works Permits (SDWP)
- Well Construction/Pump Installation Permits
- Conservation District Use Applications (CDUA)
- Special Management Area Permits (SMAP)
- Shoreline Setback Areas (SSA)

For agencies or project owners requiring DOH-CWB comments for one or more of these documents, please utilize the DOH-CWB Standard Comments below regarding your project's responsibilities to maintain water quality and any necessary permitting. DOH-CWB Standard Comments are also available on the DOH-CWB website located at: <http://health.hawaii.gov/cwb/>.

DOH-CWB Standard Comments

The following information is for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for point source water pollutant discharges into State surface waters (HAR, Chapter 11-55). Point source means any discernible, confined, and discrete conveyance from which pollutants are or may be discharged.

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

Some of the activities requiring NPDES permit coverage include, but, are not limited to:

a. Discharges of Storm Water

- i. For Construction Activities Disturbing One (1) or More Acres of Total Land Area.

By HAR Chapter 11-55, an NPDES permit is required before the start of the construction activities that result in the disturbance of one (1) or more acres of total land area, including clearing, grading, and excavation. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale.

- ii. For Industrial Activities for facilities with primary Standard Industrial Classification (SIC) Codes regulated in the Code of Federal Regulations (CFR) at 40 CFR 122.26(b)(14)(i) through (ix) and (xi). If a facility has more than one SIC code, the activity that generates the greatest revenue is the primary SIC code. If revenue information is unavailable, use the SIC code for the activity with the most employees. If employee information is also unavailable, use the SIC code for the activity with the greatest production.
- iii. From a small Municipal Separate Storm Sewer System (along with certain non-storm water discharges).

- b. Discharges to State surface waters from construction activity hydrotesting or dewatering
- c. Discharges to State surface waters from cooling water applications
- d. Discharges to State surface waters from the application of pesticides (including insecticides, herbicides, fungicides, rodenticides, and various other substances to control pest) to State waters
- e. Well-Drilling Activities

Any discharge to State surface waters of treated process wastewater effluent associated with well drilling activities is regulated by HAR Chapter 11-55. Discharges of treated process wastewater effluent (including well drilling slurries,

lubricating fluids wastewater, and well purge wastewater) to State surface waters requires NPDES permit coverage.

NPDES permit coverage is not required for well pump testing. For well pump testing, the discharger shall take all measures necessary to prevent the discharge of pollutants from entering State waters. Such measures shall include, if necessary, containment of initial discharge until the discharge is essentially free of pollutants. If the discharge is entering a stream or river bed, best management practices (BMPs) shall be implemented to prevent the discharge from disturbing the clarity of the receiving water. If the discharge is entering a storm drain, the discharger must obtain written permission from the owner of the storm drain prior to discharge. Furthermore, BMPs shall be implemented to prevent the discharge from collecting sediments and other pollutants prior to entering the storm drain.

3. A Section 401 Water Quality Certification (WQC) is required if your project/activity:
 - a. Requires a federal permit, license, certificate, approval, registration, or statutory exemption; and
 - b. May result in a discharge into State waters. The term "discharge" is defined in Clean Water Act, Subsections 502(16), 502(12), and 502(6).

Examples of "discharge" include, but are not limited to, allowing the following pollutants to enter State waters from the surface or in-water: solid waste, rock/sand/dirt, heat, sewage, construction debris, any underwater work, chemicals, fugitive dust/spray paint, agricultural wastes, biological materials, industrial wastes, concrete/sealant/epoxy, and washing/cleaning effluent.

Determine if your project/activity requires a federal permit, license, certificate, approval, registration, or statutory exemption by contacting the appropriate federal agencies (e.g. Department of the Army (DA), U.S. Army Corps of Engineers (COE), Pacific Ocean Division Honolulu District Office (POH) Tel: (808) 835-4303; U.S. Environmental Protection Agency, Region 9 Tel: (415) 947-8021; Federal Energy Regulatory Commission Tel: (866) 208-3372; U.S. Coast Guard Office of Bridge Programs Tel: (202) 372-1511). If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch regarding their permitting requirements.

To request a Section 401 WQC, you must complete and submit the Section 401 WQC application. This application is available on the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>.

Please see HAR, Chapter 11-54 for the State's Water Quality Standards and for more information on the Section 401 WQC. HAR, Chapter 11-54 is available on the CWB website at: <http://health.hawaii.gov/cwb/>.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, 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 and up to two (2) years in jail.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.
 - b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
 - c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.

- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

November 24, 2021

Alec Wong, P.E., Chief
Clean Water Branch
Hawai'i State Department of Health
PO Box 3378
Honolulu HI 96801-3378

**Subject: Comment on the Draft Environmental Assessment (EA) for the
Honalo Marshalling Yard Improvements, TMK (3rd.) 7-9-016: 018;
North Kona District, Island of Hawai'i**

Dear Mr. Wong:

Thank you for transmitting a copy of the Clean Water Branch Standard Project Comments. We reviewed the standard comments as part of Environmental Assessment (EA) preparation for the Honalo Marshalling Yard Improvements. The project involves only very minor exterior improvements, minimal grading and will not generate any noticeable additional stormwater. Section 3.1.3 provides a detailed discussion of water quality, including measures being taken to ensure the project secures all necessary permits and conforms with all applicable regulations related to stormwater and wastewater. The project plans will specify Best Management Practices (BMPs) to minimize the potential for sedimentation, erosion, and pollution of coastal waters. It appears currently that an NPDES permit is not applicable to the project. Our Department will ensure that construction work and renovation is conducted in a manner protective of the water quality for site workers, the public, facility users, and the environment.

We very much appreciate your response to the Draft EA. If you have any questions, please contact Ms. Janice Fujimoto, of my staff, at (808) 973-9473 or Janice.Fujimoto@hawaii.gov, or Mr. Ron Terry, the preparer of the EA, at (808) 969-7090, or rterry@hawaii.rr.com.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Saiki".

Kirk Saiki
Engineering Program Manager

Cc: Ron Terry, Geometrician Associates

