**JOHN WAIHEE** Governor



YUKIO KITAGAWA Chairperson, Board of Agriculture

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October 26, 1993

TO:

Brian J. J. Choy, Director

Office of Environmental Quality Control

FROM:

Yukio Kitagawa, Chairperson

Board of Agriculture

SUBJECT:

Final Environmental Assessment (EA) for the

Hamakua Agricultural Park, Phase II

TMK: 4-3-05: 02, Hamakua, Hawaii, Hawaii

The Department of Agriculture has reviewed the comments received during the 30-day public comment period which began on September 8, 1993. The agency has determined that this project will not have significant environmental effects and has issued a negative declaration. Please publish this notice in the November 8, 1993, OEQC Bulletin.

We enclose a completed OEQC Bulletin Publication Form, Notice of Determination, and four (4) copies of the final EA. Please contact Paul J. Schwind, Planning Program Administrator, at 973-9469 if you have any questions.

Encl.



# 1993-11-08- 41- FEA-HAMLEUL Agricultural Pach, Phase I FILE COPY

PD0A:743 10/25/93

#### PINAL ENVIRONMENTAL ASSESSMENT

FOR

ISSUANCE OF REVOCABLE PERMITS FOR DIVERSIFIED AGRICULTURAL AND PASTURE PURPOSES

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HAMAKUA AGRICULTURAL PARK, PHASE II

District: Hamakua, Hawaii TMK: 4-3-05: por. 2 3rd Division

# IDENTIFICATION OF PROPOSING AGENCY:

Department of Agriculture Planning and Development Office 1428 South King Street Honolulu, HI 96814 Phone: 973-9470

Mailing address: P.O. Box 22159 Honolulu, HI 96823-2159

# IDENTIFICATION OF APPROVING AGENCY:

Governor, State of Hawaii

# CONSULTED AGENCIES:

# State agencies:

Department of Accounting and General Services Department of Business, Economic Development and Tourism Department of Business, Economic Development and Tourism, State Energy Office Department of Defense Department of Education Department of Hawaiian Home Lands Department of Health Department of Health, Environmental Management Division Department of Land and Natural Resources Department of Land and Natural Resources, State Historic Preservation Division Department of Transportation

Office of Hawaiian Affairs

Office of Hawaiian Affairs
Office of State Planning
University of Hawaii, Cooperative Extension Service (Kamuela)
University of Hawaii, Environmental Center
University of Hawaii, Hawaii Branch Station (Hilo)
University of Hawaii, Water Resources Research Center

#### Federal agencies:

U.S. Army Corps of Engineers, Pacific Ocean Division
U.S. Department of Agriculture, Soil Conservation Service
U.S. Department of Commerce, National Marine Fisheries Service
U.S. Department of the Interior, Fish and Wildlife Services
U.S. Department of the Interior, National Park Service
U.S. Department of Transportation, Federal Aviation Administration

# County of Hawaii agencies:

Department of Parks and Recreation
Department of Public Works
Department of Research and Development
Department of Water Supply
Planning Department

#### Others:

Aloha Pacific Farms American Lung Association Hamakua-North Hilo Agricultural Cooperative Hawaii Audubon Society Hawaii Beef Packers, Inc. Hawaii Island Economic Development Board Keaau Plantation Hawaii Kohala Nursery, Inc. Paauilo Mauka-Kalopa Community Association Puna Certified Nursery Tropical Hawaiian Products George T. Arakawa Alfred Cordeiro Brian Nishimura Glenn S. Oshiro Mark Sirota Robert Tamaye

#### I. PROPOSED ACTION

The Department of Agriculture (DOA) has acquired a license to use and operate that certain parcel of real estate situate in the County and State of Hawaii, designated as Tax Map Key No. 4-3-05:02, consisting of 509 acres, more or less, together with the buildings, facilities and improvements thereon, until title to the property is conveyed to the DOA pursuant to a Memorandum of Agreement dated May 28, 1993, subsequently filed and approved in the U.S. Bankruptcy Court for the District of Hawaii. See Figure 1 for approximate location of the site.

An environmental assessment and negative declaration for continuation of the existing slaughterhouse operation has been filed in conformance with Chapter 343, HRS, for Phase I (approximately 91 acres) of the Hamakua Agricultural Park.

The DOA intends to issue sublicenses or revocable permits to qualified firms or individuals for diversified agricultural and pasture purposes on the balance of the property (approximately 418 acres), as Phase II of the Hamakua Agricultural Park, on an interim basis until the DOA receives title to the property. Except for some temporary fencing and limited upgrading of irrigation system equipment at the waste ponds, there will be no new structures; the agricultural activity will represent a continuation of crop and livestock uses similar to those previously present on the property. The interim activities will make an immediate contribution to the economic recovery of the Hamakua region, in part through the receipt and expenditure of available Federal funds. See Figure 2 for the Phase I and Phase II areas of the project site.

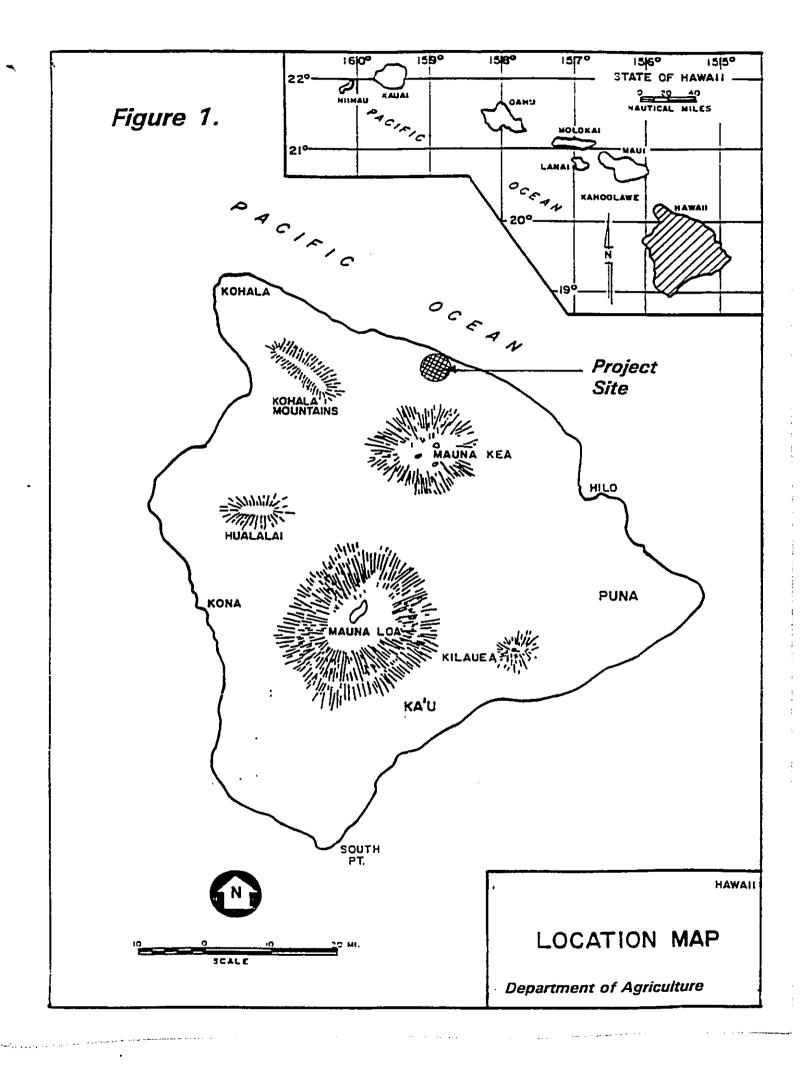
Once the DOA receives title to the property, a more detailed environmental assessment will be prepared for the entire parcel, which the DOA intends to improve and subdivide in order to provide long-term agricultural park leases with physical access to public roadways, for purposes including but not limited to development of a meat-packing and processing operation within the project.

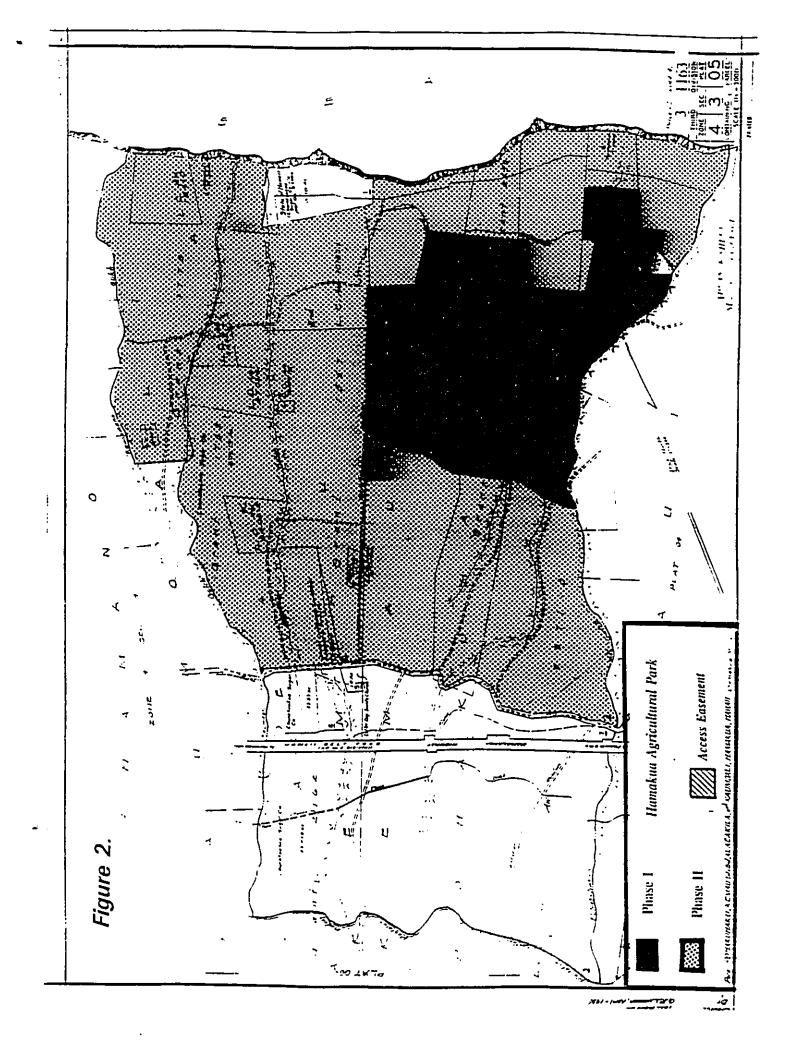
# II. GENERAL DESCRIPTION

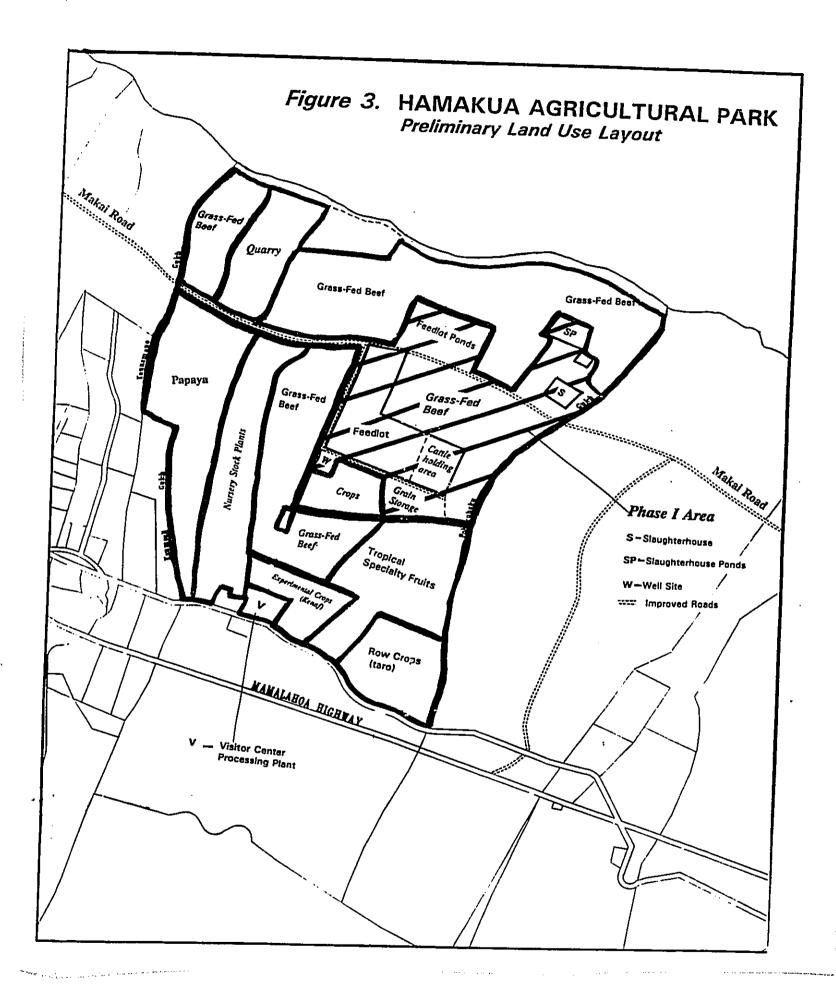
#### A. <u>Technical</u>

The U.S. Bankruptcy Court for the District of Hawaii approved a Memorandum of Agreement (settlement agreement) dated May 28, 1993, between the State of Hawaii, the Western Farm Credit Bank (WFCB), Hawaii Production Credit Association (HCPA), and John T. Goss, as Trustee of Hamakua Sugar Company (HSC), in which property comprising of approximately 509 acres, including the slaughterhouse and feedlot facilities, shall be conveyed to the State of Hawaii. Pursuant to section 155-4(12), Hawaii Revised Statutes, the Department of Agriculture (DOA) is authorized to hold title to real property which is acquired to recover moneys loaned. Pending delivery of title, the DOA has received a license dated June 11, 1993, to use and operate the property at no cost "for such purposes as [it] may deem fit." The DOA issued a revocable permit to Hawaii Beef Packers, Inc. (HBP) for the slaughterhouse facilities, animal holding paddock, and waste water disposal area on August 23, 1993. The Board of Agriculture approved on October 20, 1993, the issuance of a revocable permit to Pacific Livestock Marketing Service to assemble, weigh, and temporarily house feeder cattle prior to marshalling at Kukaiau Ranch for export to Canada, using the existing scale and two of the former feedlot paddocks in the HBP area.

On an interim basis until the DOA receives title to the property, the Department intends to issue sublicenses or revocable permits to qualified firms or individuals for diversified agricultural and pasture purposes on the balance of the property, as Phase II of the Hamakua Agricultural Park. These diversified purposes may include but not be limited to demonstration projects for grass-fed "organic" beef, cultivation of tropical fruits and spices, raising of nursery stock plants, and experiments with new industrial crop varieties. These projects will make an immediate contribution to the economic recovery of the Hamakua region, in part through the receipt and expenditure of available Federal funds. See Figure 3 for the preliminary land use layout of the property.







Once the DOA receives permanent title to the property, the
Department intends to prepare a comprehensive plan for development
of the entire 509-acre parcel as the Hamakua Agricultural Park,
including improvements and subdivision of lots suitable for
long-term agricultural park leases. At such time, the DOA will
prepare a more detailed environmental assessment, or environmental
impact statement if required, for the long-range development and use
of the property.

#### B. Socio-Economic

Local Employment. The most recent (1991) Statistics of
Hawaiian Agriculture indicates that there were approximately
6,190 persons employed in agriculture on the island of Hawaii,
of whom 1,900 were self-employed and 3,650 were hired workers.
Of the latter, 900 were employed in the sugar industry. The
majority of these sugar workers will be unemployed within less
than two years following the final harvests of Hamakua Sugar
Company and Mauna Kea Agribusiness/Hilo Coast Processing
Company.

Based on preliminary survey data on the sugar workers, it appears that perhaps one-third (300) may want to continue employment in some form of agriculture in the Hamakua-Hilo Coast area, while only about twenty (20) would like to start their own agricultural business. Approximately 85 persons are in the process of becoming members of the Hamakua-North Hilo Agricultural Cooperative for purposes of acquiring land, seeking training and technical assistance in farming and business management, and purchasing large farm equipment in common. The cooperative has expressed interest in farming up to 200 acres of the subject property in a variety of diversified crops, including 50 acres of papaya.

The number of persons who will be employed at the Phase II project area in the interim agricultural activities which are the subject of this assessment is not known, but will probably be from 10 to 15. The slaughterhouse operation in the Phase I area employs 11 persons. An unknown but proportionate increase in employment could also be generated in ancillary economic activities such as farm supply outlets, wholesalers, and distributors.

(2) Diversified Agriculture and Pasture. Crops that could be considered for small farm agricultural park development, that are both agronomically suited to the Hamakua region and have realistic market potential, include (with their 1991 Hawaii County acreage in parentheses): flowers/foliage (1,361), guava (515), papaya (1,915), banana (420), macadamia nuts (20,500 [estimate]), tropical specialty fruits (210), cacao (no data), dryland taro (170), and ginger (250). If each of these commodities were to reach its estimated market potential, the Big Island acreages might be as follows: flowers/foliage (3,009), guava (858), papaya (2,618), banana (894), macadamia nuts (29,006), tropical specialty fruits (no data), cacao (no data), dryland taro (530), and ginger (379). In most cases these estimates reflect relatively modest increases in acreage, nowhere near enough to replace the approximately 43,500 acres being withdrawn from sugarcane production on the Hamakua-Hilo Coast. However, proposed expansion of area in improved pasture and commercial tree plantings could add materially to these figures.

The 1991 Statistics of Hawaiian Agriculture indicates that of the State's 900 existing cattle operations, 460 are located on the island of Hawaii. Further, figures show the total sale value received from cattle in the State is \$33 million, of which \$27 million is generated from the island of Hawaii. Cattle industry revenue is ranked fourth of diversified agriculture value and makes up 12 percent of total agricultural value. These statistics show that the ranching industry on the Island is an important and critical part of its economy.

Among the projects which could make immediate use of the Phase II area of the Hamakua Agricultural Park on an interim, revocable-permit basis are several ventures which may be supported by seed money funding from the U.S. Department of Defense (DOD). These projects would be part of a master-grower concept in the first phase of which a central packer or marketer would support initial test planting by part-time new farmers, with minimum working capital and risk. In later phases of the master-grower concept, the farmers would take on commercial production under longer-term leases, while the packer or marketer organizations would establish more permanent facilities and concentrate on processing, distribution, marketing, and seeking new products. The phasing of this concept fits well with the timing of use of the subject property on an interim basis under license until the State acquires permanent title to the land.

The demonstration projects expected to locate in the agricultural park for a two to three year period are (a) organic (grass-fed) beef production for slaughter, packing, and processing at the existing slaughterhouse and sale as fresh hamburger, dried beef jerky, and sausage; (b) tropical fruit and spice cultivation for export sales in dried or processed form; (c) dryland taro production for processing into poi and flour; (d) experiment with growth of kenaf for processing into potting material, animal feed, and chemical spill absorbent (a critical industrial material); and (e) cultivation of stock plants for finished nursery production (not a DOD-funded project). The preliminary land use layout in Figure 3 indicates the possible locations of the projects in the subject property.

(3) Local Community. Due to the shutdown of sugarcane operations, the region will experience less traffic movement, more security problems, greater fire hazards, and other problems associated

with vacancy and non-use of the formerly cultivated lands. The agricultural park will help alleviate this by providing occupancy at the site, conservation and cultivation of the land, and traffic activity within the surrounding roadways and region.

Approximately 80 community members have protested the odor and flies emanating from the feedlot in the past, and have made recommendations for a maintenance and waste management program if the feedlot is reopened. This correspondence is included among the comments received on the draft environmental assessment.

(4) Existing Infrastructure. A paved cane-haul roadway provides physical access over an adjacent parcel from Mamalahoa Highway and the Old Government (County) Main Road, and power poles are also located within the road right-of-way. Improvements to this old public road, to provide a minimum 18-foot wide pavement and 2-foot shoulders, would be required fronting the proposed visitor center if it is developed as shown in Figure 3. The State shall have reasonable legal access and utility rights to the property, subject to negotiation pursuant to the Settlement Agreement. Presently, the property is served with electricity from the Hawaii Electric Light Company's power generation plant at Hamakua.

Eighty percent of the water from an underground well on site is allocated to the property by the Settlement Agreement, and is supplied through a pump and tank system which is approved as a potable water supply. The State also has the right to take irrigation water from the Lower Hamakua Ditch, to which the State shall have reasonable access rights (easements). The property is not within the service limits of the Department of Water Supply's existing water system facilities, and existing systems in adjacent areas are not capable of supporting the

agricultural park at this time. Except for temporary fencing and limited upgrading of irrigation system equipment at the waste ponds, there will be no new or additional infrastructure improvements for this proposed interim action. Sanitary facilities for employees are located in the slaughterhouse facility or may be provided by portable comfort stations if required.

### C. Environmental

Waste resulting from the slaughtering operations is handled on-site by the rendering plant and eight earthen waste storage ponds. There are four ponds which collected waste from the former livestock feedlot, and another four ponds to handle slaughterhouse and rendering plant liquid waste. These ponds are fed directly from the plants by gravity and basically handle liquids, as all solids are screened and removed to the rendering plant. The ponds are within the UIC (underground injection control) zone but are in a non-critical wastewater disposal area. Water levels are kept from overflow with a pumping scheme which distributes the effluent to the surrounding fields, which up to the present time have been in sugarcane cultivation. The Department of Health exempted the original feedlot from NPDES permit requirements in 1986.

The organic beef production demonstration project will continue to utilize waste water from the slaughterhouse, rendering plant, and a small cattle holding area to irrigate approximately 35 acres of pasture in a buffer zone adjacent to the plant facilities. Ditch water and fertilizers will also be applied as needed.

# III. SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT

#### A. <u>Topography</u>

The Phase II area of the Hamakua Agricultural Park is situated on former sugar plantation lands. The property is bounded by

Pohakuhaku Gulch on the Hilo side and by Kaumoali and Kaunamano Gulches on the Honokaa side. General land slope ranges from 10 to 30 per cent, while gulches on the project site have slopes ranging from 35 to 70 percent. The arable land has been graded, ploughed, contoured, and otherwise disturbed over many years to accommodate sugarcane cultivation. Rock and gravel for plantation use has been mined at a small quarry near the northwest corner of the property. Hamakua Sugar Company withdrew the 91-acre Phase I area of the agricultural park site from sugarcane cultivation due to its unsuitability to mechanization and established a feedlot and slaughterhouse operation there in 1986. As many as 6,500 animals were held for fattening in the feedlot at any given time. The 418-acre balance of the site was maintained in sugarcane until the present time (except for unsuitable gulch areas).

# B. Soils and Climate

The site extends from the sea cliffs in a mauka direction to the Old Government Main Road, a distance of approximately one mile, and receives approximately 60 to 80 inches of rainfall per year. Wind patterns are influenced by the land/sea heating process (ocean breezes at night and land breezes during daylight).

The soils on the subject property consist of five soil types, as classified by the U. S. Department of Agriculture Soil Conservation Service (SCS) Soil Survey. Approximately 85 percent of the soils consist of Ookala silty clay loam (OoC, OoD, and OoE). Ookala soil series are generally well-drained and have a very strongly acidic surface layer and a slightly acidic to medium acidic subsoil. A small portion of the property (5 percent) consists of Kukaiau Series (KuC). The remaining 10 percent of the property contains rough broken land (RB) which is found within gulches. Detailed descriptions of the soil series are as follows:

OoC Ookala silty clay loam, 6 to 12 percent slopes. Approximately 15 percent of the subject property is classified OoC.

Permeability is moderately rapid, runoff is slow, and the erosion hazard is slight. The capability classification is IIIe, nonirrigated, which generally means good agricultural productivity.

- OoD Ookala silty clay loam, 12 to 20 percent slopes. Approximately 60 percent of the subject property is classified OoD. Permeability is moderately rapid, runoff is medium, and the erosion hazard is moderate. The capability classification is IVe, nonirrigated, which generally means fair agricultural productivity.
- OoE Ookala silty clay loam, 20 to 30 percent slopes. Approximately 15 percent of the subject property is classified OoD. Permeability is moderately rapid, runoff is rapid, and the erosion hazard is severe. The capability classification is VIe, nonirrigated, which generally means fair to poor agricultural productivity.
- KuC Kukaiau silty clay loam, 6 to 12 percent slopes. Approximately 5 percent of the subject property is classified KuC. Permeability is moderately rapid, runoff is slow, and the erosion hazard is slight. The capability classification is IIIe, nonirrigated, which generally means good agricultural productivity.
- RB Rough broken land consisting of very steep, precipitous land broken by many intermittent drainage channels, the slope is dominantly 35 to 70 percent. About 5 percent of the subject property is classified as RB. It occurs primarily in gulches, and stones and rock outcrops are common in some areas. The capability classification is VIIe, nonirrigated, which means poor agricultural productivity.

The Land Study Bureau's Detailed Land Classification for the Island of Hawaii has designated the lands within the project site as

predominantly Class C (C196 and C198). A small portion of the subject area covering the gulches and steep coastline is rated as Class E lands (E318). From an agronomic perspective, the land types for this site are moderately suited to machine tilling, well drained, and nonstony. The subject area has good to fair productivity potential for orchard and grazing uses.

Similarly, the majority of the project site has been rated "Prime" (about 75 percent) and "Other Important" (15 percent) by the Department of Agriculture's "Agricultural Lands of Importance to the State of Hawaii" (ALISH) system. This classification indicates that the major portions of the subject site have the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops economically when treated and managed according to modern farming methods. The limited portions (10 percent) of the project area that are not classified represent gulches.

The Department of Health has identified two aquifer types underlying the project site: (1) an unconfined flank basal aquifer identified as a fresh drinking water resource currently in use and moderately vulnerable to contamination; and (2) an unconfined high-level perched aquifer identified as a potential fresh drinking water resource and highly vulnerable to contamination.

The majority of the project area is outside the 500-year flood plain; the coastline is designated a special flood hazard area. Runoff and erosion hazard from the site are controlled with the existing waste management ponds, but the majority of storm flows are absorbed into the ground, and little surface runoff has been experienced at the site. The proposed interim activities are not expected to materially alter this pattern. No work or structures is proposed in the gulches or coastline area.

# C. Flora and Fauna

Small clumps of guinea grass (Panicum maximum) are seen growing throughout the site. The earthen embankments of the waste

management pond area are covered with a local variety of california grass (Brachiaria mutica), which is the prevailing foliage cover of the region. The ponds have been stocked with introduced water hyacinths to assist in the treatment of the accumulated wastewater, but the majority of the water is evaporated. Indigenous birds common to the region utilize the pond area for feeding and roosting; ring-necked doves and mynah birds are the predominantly observable species. Ironwood trees (Casuarina spp) line the boundaries of the gulches and sea cliffs. These trees range from 10 to 30 feet in height and in some instances serve as windbreaks. Although a professional botanical survey of the site has not been done, none of the plants observed appear to be endemic, nor do there appear to be sensitive habitats. Land title research indicates that this site has been cultivated with sugarcane since around 1898, although old-time residents indicate that portions of the property were previously used for pasture at intermittent periods.

#### D. <u>Historical</u>, Archaeological and Cultural Features

The land has been in sugarcane cultivation since the early part of the century and consequently has been repeatedly cleared, grubbed and graded. Although no archaeological reconnaissance of the site has been done, it is probable that any signficant features would have been destroyed during previous grading operations. There are no obvious caves, rock walls or platforms visible in cultivated areas of the site. Land title research reveals that the land was obtained directly from Hawaiian families who were the original inhabitants as indicated by Royal Patent numbers and Land Commission numbers assigned to the titles.

There are no residents or any urban type activity in the general vicinity of this site. Any and all urban activity occurs along the Mamalahoa Highway and the Old Government Main Road, the latter of which adjoins the mauka boundary of the property. The Lower Hamakua Ditch, which today has the capability to service this area with

irrigation water through underground pipelines, at some point in the past was connected through a system of ditches, none of which now remain.

An old cane-hauling railroad right-of-way is shown on tax maps, but field inspection reveals no trace of the railroad roadbed anywhere on this site. Long-time residents indicate the railroad was abandoned in the 1940's when the plantation began to utilize mechanized trucks and constructed a new system of cane-hauling roads, which was a more efficient and cost-effective method of transporting harvested cane to the mill.

#### E. Land Use Plans, Policies and Controls

The northern (makai) coastal portion of the Phase II area is located within the Limited ("L") subzone of the Conservation District, and is designated by the County General Plan as Open Area and Special Management Area. The balance of the property is in the Agricultural District, designated Intensive and Extensive Agricultural in the General Plan, and is zoned Agricultural-20,000 acres (A-20,000a).

# IV. IDENTIFICATION AND SUMMARY OF MAJOR IMPACTS

#### A. <u>Diversified Agriculture</u>

The interim use of the Phase II area of the Hamakua Agricultural Park for diversified crop cultivation is not anticipated to cause any significant adverse short-term or long-term impacts. In its historical use for sugarcane cultivation, the site has received repeated applications of soil amendments to improve fertility and permeability, as well as herbicides to control weeds. The cultivation of other crops may require the substitution of alternative chemicals for maximum effectiveness. Any pesticides used will be in accordance with label restrictions, as required by Federal and State law, and will be by applicators certified by the Department of Agriculture.

All of the cropland contained in the Phase II area has been determined by the U.S. Soil Conservation Service (SCS) to be highly erodible, and is therefore subject to the provisions of the Food Security Act of 1985. The Hamakua Sugar Company had an approved conservation plan for this area, but did not complete installation of the required conservation practices. Therefore, existing conservation measures for erosion and runoff control will be maintained and implemented as necessary by the permittees of the interim demonstration projects. Over the longer term, once the State acquires title to the property, a drainage plan will be prepared, permanent drainage easements will be provided as part of a lot subdivision plan, and prospective lessees will be required to develop conservation plans with the advice of the SCS and approval by the Department before receiving right of entry to their lots.

#### B. <u>Improved Pasture</u>

The organic (grass-fed) beef production demonstration project has requested 211 acres of the Phase II area of the Hamakua Agricultural Park for a period of up to three years, as pasture for 300 to 600 cattle. The demonstration will evaluate the effects on grade and yield of forage finished cattle in a warm, high rainfall tropical environment. Various tropical forage grasses will be evaluated along with the interactions between high density grazing, rest periods, and management of the forage residual (by mowing or for fattening of cull cattle). The feasibility of fertilization, drip irrigation of pasture, and animal handling practices will also be evaluated, and the actual number of animals run through the program will depend upon their performance and the carrying capacities of the pasture sections.

Hawaii Beef Packers (HBP) will kill 60 animals per day, three days per week at a maximum (including 10 to 20 head from the demonstration project), for a total of 180 per week compared to the slaughterhouse capacity of 400 head per week. The number of culled,

bull, and backyard animals on the island is estimated by the Department not to exceed 6,000 total that may be slaughtered during an entire year. As the number of culls is reduced, the kill rate will drop to 120-140 per week (two days per week).

The holding area will be used to keep no more than 120-150 cattle at a time for the slaughterhouse (two days kill), in addition to which as many as another 200 feeder cattle will be held over weekends for weighing by Pacific Livestock Marketing Service. The revocable permit to HBP was issued on a number of conditions, including:

- "10. Keep the Premises and improvements in a clean, sanitary, and orderly condition. ...
- 12. Not make, permit, or suffer, any waste, strip, spoil, nuisance or unlawful, improper, or offensive use of the Premises."

It is estimated that for each animal killed, there will be approximately 650 gallons of wastewater generated. The generation of liquid waste from the slaughterhouse, rendering plant, and cattle holding area will be half or less that during the previous operation of these facilities at normal capacity. The 35 acres of pasture to be designated in the demonstration project area for slaughterhouse waste water irrigation will be more than sufficient to accept the amount of effluent (less than 40,000 gallons) which will be generated on "kill" days. The waste storage ponds must be able to contain all waste waters and contaminated runoff from a 25-year, 24-hour rainfall event, for which purpose the permittee(s) must submit a wastewater treatment and disposal plan acceptable to the Department of Health, as well as conform to Chapter 11-62, Hawaii Administrative Rules ("Wastewater Systems").

Compared to the number of animals (up to 6,500) which were held in the 91-acre former feedlot for grain feeding under confined conditions, the "dry" waste management impact of 300 to 600 grazing

animals (5 to 10 percent of the former number) distributed over 200 acres of pasture, as well as up to 350 animals in the holding area, will be minimal. This is particularly the case since the effluent waste load from the former feedlot was distributed from the waste storage ponds to irrigate this same area (now designated for pasture) when it was in sugarcane cultivation. The impact of the original level of wastewater irrigation on soils and groundwater quality is not known.

#### C. Surrounding Environment and Community

The proposed action will not cause significant impacts due to the fact that the agricultural activities will be temporary in nature, until the State acquires permanent title to the property, and in the interim no permanent structures or improvements will be constructed. The introduction of the demonstration crop and livestock projects will be phased to follow the final sugarcane harvest of Hamakua Sugar Company, the last fields of which should be cleared in this area by June, 1994. Traffic impact will be minimal, limited to perhaps 20 to 30 worker-related commuter trips daily, and perhaps half that number of delivery-related truck trips daily, to and from the Phase II area of the agricultural park. A traffic impact assessment will be provided if required at the time a more detailed environmental assessment is prepared for the long-range development and use of the property, to determine if additional roadway and intersection improvements will be necessary.

Any historical, archaeological and cultural sites would either have been preserved or, in the worst case, would be beyond recovery, due to mechanical disturbances from sugarcane cultivation. The site does not contain sensitive habitats, bodies of water, or aesthetic views that are of major significance. Any endangered flora or fauna would have been displaced when the area was cultivated in sugarcane and would not have survived the many clearing, grubbing and grading cycles which have occurred since 1898. Based on these facts, there should be no significant impacts from diversified agricultural and pasture use of the property for this interim period.

#### V. <u>ALTERNATIVES CONSIDERED</u>

#### A. Sell the Property

This alternative was unacceptable, as the tax assessed value of the entire agricultural park property (Phase I and II areas, 509 acres) is approximately \$2 million. Although the property has not been formally appraised to determine its fair market value, it was felt that its sale would not make a sufficient contribution to recovery of the approximately \$9.5 million balance of the State's loan to Hamakua Sugar Company. In the long term, the State will realize greater benefits from development of the property as an agricultural park.

## B. Direct Interim Agricultural Activities to Other State Lands

This alternative was also unacceptable, as the Department of Land and Natural Resources (DLNR) is separately proposing (see final environmental assessment published October 8, 1993) to lease approximately 6,559.05 acres of public lands in the Hamakua region to various private vendors for the development of diversified agriculture, to include tree planting, nurseries, and agricultural crops. Of these public lands, 5,136 acres will be utilized for sustainable forest plantations to produce high value tropical hardwoods and other unique Hawaiian forest products. The remaining 1,423 acres is planned for lease to the Hamakua-North Hilo Agricultural Cooperative for vegetable, horticulture, taro, papaya, macadamia nut, and pasture production. Disposition of these lands will require some time to go through default proceedings to terminate the sugar leases, and public notice and selection processes required by law before new leases can be issued to qualified applicants. Given its June 11, 1993, license agreement from the Hamakua Sugar trustee, the DOA is in a better position to rapidly issue short-term revocable permits on the subject property so that the Federally funded (DOD) demonstration projects can begin immediately.

#### C. No Action

This was not a viable alternative; combined with the shutdown of Hamakua Sugar Company, no action would contribute to the economic depression threatening the region. Any economic activity, no matter how small or temporary, should be encouraged if it will contribute to the economic recovery of the Hamakua-Hilo Coast while acceptable longer-term solutions are also sought. The proposed action is within the Department's powers and responsibilities to take positive action to develop new agricultural ventures as interim demonstration projects with Federal grant support.

#### VI. PROPOSED MITIGATION MEASURES

There are no significant adverse impacts anticipated as a result of this action, so there will be no mitigation measures required.

#### VII. DETERMINATION

Based on the foregoing discussion, it is determined that the proposed action of issuance of revocable permits for diversified agricultural and pasture purposes at Phase II of the Hamakua Agricultural Park will not significantly or adversely affect the environment or the community. The continuation of bonafide, viable agricultural activities on the subject property will require no variances or exemptions from existing land use and environmental regulations and permitting procedures. A negative declaration is therefore recommended by the Department of Agriculture.

#### VIII.PRE-ASSESSMENT CONSULTATION RESPONSES RECEIVED FROM CONSULTED AGENCIES

The Department of Agriculture's pre-assessment consultation memorandum of August 5, 1993, and responses received are attached.

# IX. COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT RECEIVED FROM CONSULTED AGENCIES

The Department of Agriculture's request for comments of August 26, 1993, and comments received are attached, along with the Department's response where required. Notification of the official 30-day review period was published in the OEQC Bulletin on September 8, 1993, and ended on October 8, 1993.

JOHN WAIHEE
Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

August 5, 1993

YUKIO KITAGAWA
Chairperson, Board of Agriculture

ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honolulu, Hawaii 96823-2159

TO:

FROM:

Yukio Kitagawa, Chairperson

Board of Agriculture

SUBJECT:

PRE-ASSESSMENT CONSULTATION FOR ENVIRONMENTAL ASSESSMENT -

HAMAKUA AGRICULTURAL PARK, PHASE II, PAAUILO, COUNTY OF HAWAII

The Department of Agriculture (DOA) has acquired a license to use and operate that certain parcel of real estate situate in the County and State of Hawaii, designated as Tax Map Key No. 4-3-05:02, consisting of 509 acres, more or less, together with the buildings, facilities and improvements thereon, until title to the property is conveyed to the DOA pursuant to a Memorandum of Agreement dated May 28, 1993, subsequently filed and approved in the U.S. Bankruptcy Court for the District of Hawaii.

An environmental assessment and negative declaration for continuation of the existing slaughterhouse operation has been filed in conformance with Chapter 343, HRS, for Phase I of the Hamakua Agricultural Park.

This is to provide notice for consultation with agencies having jurisdiction or expertise, as required by Section 11-200-9(a), HAR, that the DOA intends to issue sublicenses or revocable permits to qualified firms or individuals for diversified agricultural and pasture purposes on the balance of the property (approximately 418 acres), as Phase II of the Hamakua Agricultural Park, on an interim basis until the DOA receives title to the property. Except for some temporary fencing, there will be no new structures; the agricultural activity will represent a continuation of crop and livestock uses similar to those previously present on the property. The interim activities will make an immediate contribution to the economic recovery of the Hamakua region, in part through the receipt and expenditure of available Federal funds.

Once the DOA receives title to the property, a more detailed environmental assessment will be prepared for the entire parcel, which the DOA intends to improve and subdivide in order to provide long-term agricultural park leases, including but not limited to development of a meat-packing and processing operation within the project.

Please submit any concerns or comments to Dr. Paul J. Schwind, Planning Program Administrator, Planning and Development Office, by August 18, 1993.



JOHN WAIHEE GOVERNOR



STATE OF HAWAII DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P. O. BOX 119. HONOLULU, HAWAII 96810

ROBERT P. TAKUSHI COMPTROLLER

LLOYD'I. UNEBASAMI DEPUTY COMPTROLLER

LETTER NO. (P) 1598.3

AUG 1 2 1993

Department of Agriculture Planning and Development Office 1428 South King Street Honolulu, Hawaii 96814-2512

Attention: Dr. Paul Schwind

Gentlemen:

Subject: Hamakua Agricultural Park, Phase II Paauilo, Hawaii County

Pre-Assessment Consultation for

Environmental Assessment

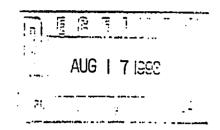
Thank you for the opportunity to review the subject project description. We have no comments to offer.

If there are any questions, please have your staff contact Mr. Ralph Yukumoto of the Public Works Division at 586-0488.

Very truly yours,

ROBERT P. TAKUSHI State Comptroller UNITED STATES DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE P. O. BOX 50004 HONOLULU, HI 96850-0001

August 13, 1993



Dr. Paul J. Schwind Planning Progam Administrator Department of Agriculture 1428 So. King Street Honolulu, Hawaii 96814-2512

Dear Dr. Schwind:

Subject: PRE-ASSESSMENT CONSULTATION FOR ENVIRONMENTAL ASSESSMENT HAMAKUA AGRICULTURAL PARK, PHASE II, PAAUILO, COUNTY OF HAWAII

All of the sugarcane cropland contained in the proposed agricultural park area (418 acres) are determined to be highly erodible and subject to the provisions of the Food Security Act of 1985. No determination has been made for the feedlot or slaughter house areas.

Hamakua Sugar Company has an approved FSA conservation plan which includes the proposed area, however the company has not completed installation of the conservation practices planned for that land parcel.

We recommend that all existing conservation measures be maintained and an adequate drainage plan be developed for the Agricultural Park prior to awarding of the leases to agricultural operators. Furthermore, to preclude long term drainage problems, it will be prudent to provide for the maintenance of permanent drainage easements in the lease agreements.

Thank you for the opportunity to provide comment on a very important and commendable agricultural development. Should you have any questions, please do not to hesitate to contact Mike Tulang at 541-2606 or Larry Yamamoto at 541-2603.

Sincerely,

NATHANIEL R.

State Conservationist

cc: Lindsey Carter, District Conservationist, Hawaii Field Office.

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION

DEPUTY DIRECTORS JOYCE T. OMINE AL PANG KANANI HOLT CALVIN M. TSUDA

IN REPLY REFER TO: STP 8.5397

869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

August 16, 1993

TO:

The Honorable Yukio Kitagawa, Chairperson

Board of Agriculture

FROM:

Rex D. Johnson

Director of Transportation

SUBJECT:

Pre-Assessment Consultation for Environmental Assessment - Hamakua

Agricultural Park, Phase II

While we foresee no significant impacts on our transportation facilities by continuing agricultural activities similar to those previously present on the property, we may have further comments after we have had the opportunity to review the environmental assessment and negative declaration.

#### HONOKAA FARMERS COOPERATIVE

P.O. Box 1363, Honokaa, HI 96727 Ph. 808-776-1602 Fax 808-776-1006

August 16, 1993

Paul Schwind Fax to 808-973-9613 Department of Agriculture 1428 So. King Street Honolulu, HI 96814-2512

RE: PRE-ASSESSMENT CONSULTATION FOR ENVIRONMENTAL ASSESSMENT -HAMAKUA AGRICULTURAL PARK, PHASE II, PAAUILO, COUNTY OF HAWAII

Dear Paul,

Honokaa Farmers Cooperative (HFC) members are interested in farming a variety of crops on the proposed agricultural park property designated as Tax Map Key No. 4-3-05:02.

The Honokaa Farmers Cooperative hopes to be accepted as a qualified applicant, able to receive sub licenses for diversified agriculture purposes at the proposed agriculture park.

The following are the agricultural crops and required acreage the HFC is interested in developing:

Crop	<u>Acreage</u>
Papaya	50
Taro	25
Guava	25
Banana	15
Macadamia	15
Ginger	10
Exotic Foliar Plants	10
Windbreak Trees	10 10
Agricultural Industrial Area	
Tropical Fruit Trees	10
Landscape Plants	10
Coffee	5
Misc. (Vegetables, Poha,	_
Dasheen, others)	5
TOTAL	
TOTAL	200

Please notify us at the conclusion of the environmental assessment process or as soon as your department begins taking applications for this property.

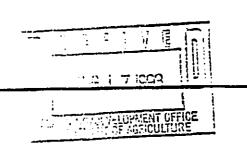
Sincerely

Bart Jones
Vice President

Honokaa Farmers Cooperative

(mes)





P. O. Box 787 • Kea'au, Hawaii 96749 Ph. (808) 966-7408 • Fax (808) 966-9385

Fax Transmittal Sheet

To: Sept of As Aun.: De Jand Schwind From: Prom: Propage Ha		
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If any problems occur during the transmission OR

If you have any questions, please call.

Thank You!





Rainforest Alliance APPROVED 8/17/93

DR. PAUL J. SCHWIND
PLANNING PROGRAM ADMISISTRATOR
PLANNING DEVELOPEMENT OFFICE
DEPARTMENT OF AGRICULTURE
1428 SO. KING ST.
HONO, HI 96814-2512

DEAR PAUL,

THIS LETTER IS IN RESPONSE TO CHAIRMAN KITAGAWA'S LETTER OF 8/5/93, PRE-ASSESSMENT CONSULTATION FOR ENVIRONMENTAL ASSESSMENT-HAMAKUA AGRICULTURAL PARK, PHASE II, PAAUILO, COUNTY OF HAWAII.

I AM ADDRESSING THE 3D PARAGRAPH WHERE THE DOA MAY ISSUE SUBLICENSES OR REVOCABLE PERMITS---(APPROXIMATELY 418 ACRES)

THE BIG ISLAND BANANA GROWERS ASSOCIATION HAS MORE THAN 450 ACRES AVAILABLE FOR BANANA EXPANSION. THEY PLAN TO ELIMINATE MOST OF THE IMPORTS IN 5 YEARS OR LESS.

WE ENCOURAGE SMALL BANANA FARMING, UP TO 10 ACRES, IN STATE AG PARKS. HOWEVER, WE ARE AGAINST THE USE OF STATE LANDS FOR LARGE SCALE BANANA FARMING. LARGE SCALE BANANA FARMING ON STATE LANDS WILL CAUSE SERIOUS HARDSHIP TO THE PRESENT FARMERS AND WILL NOT HELP THE LOCAL BANANA INDUSTRY. MORE LIKELY IT WILL HURT THE INDUSTRY.

THE BIG ISLAND BANANA GROWERS ARE FULLY AWARE OF THE AMOUNTS OF CAVENDISH BANANAS IMPORTED INTO THE STATE. WE ARE ALSO AWARE OF THE MARKET FORCES AT WORK AS WELL AS THE DELICATE TIMING NECESSARY FOR THE INDUSTRY TO BE SUCCESSFUL IN REPLACING IMPORTS.

AS FAR AS EXPORTING CAVENDISH BANANAS, THE NUMBERS DON'T WORK. WE CAN'T COMPETE ON THE MAINLAND EVEN IF THE FREIGHT TO GET THE FRUIT THERE WAS FREE.

AS FAR AS EXPORTING APPLE BANANAS, IT DOESN'T WORK FOR THE SAME REASONS. FOR EXAMPLE, MANZANO WHICH IS SIMILAR TO OUR APPLE BANANA IS SOLD ON THE L.A. MARKET FOR 41-45 CENTS PER LB/RIPE. IT WOULD COST 70 CENTS PER POUND TO GET OUR APPLE BANANA RIPE TO L.A. FARMERS ARE PAID ABOUT 52 CENTS PER POUND NOW FOR APPLE. MATSON FREIGHT WOULD BE ABOUT 13 CENTS PER POUND WHILE RIPENING MAY BE ANOTHER 5 CENTS. THERE ARE OTHER ISSUES SUCH AS FRUIT FLY, STEADY PURCHASE GUARANTEE, ETC. BUT THEY ARE SECONDARY.

WE THINK THAT ALL THESE PROBLEMS MUST BE SOLVED BEFORE EXPORT PRODUCTION IS ENCOURAGED. OTHERWISE, FAILED FRUIT WILL BE DUMPED INTO THE LOCAL MARKET.

THANK YOU,

RICHARD HAJR.

PRESIDENT

**BIG ISLAND BANANA GROWERS ASSOCIATION** 

<del>--</del> \_ ·



#### STATE OF HAWAII DEPARTMENT OF EDUCATION

P. O. BOX 2360 HONOLULU, HAWAH 96804

OFFICE OF THE SUPERINTENDENT

August 24, 1993

MEMO TO: Dr. Paul J. Schwind

Planning Program Administrator Planning and Development Office, DA

FROM: Charles T. Toguchi, Superintendent Department of Education

SUBJECT: Pre-assessment Consultation for Environmental Assessment

Hamakua Agricultural Park, Phase II, Paauilo, Hawaii TMK: 4-3-05: 02

Our review of the subject agricultural park indicates that the proposed use of 509 acres for diversified agriculture will have no impact on the schools in the area.

Thank you for the opportunity to comment.

CTT: hy

cc: A. Suga

A. Garson

Stephen K. Yamashiro Mayor



Virginia Goldstein Director

Norman Olesen
Deputy Director

# County of Nawaii

#### PLANNING DEPARTMENT

25 Aupuni Street, Room 109 • Hilo, Hawaii 96720-4252 (808) 961-8288 • Fax (808) 961-9615

September 2, 1993

Mr. Yukio Kitagawa, Chairperson Board of Agriculture State of Hawaii Department of Agriculture 1428 South King Street Honolulu, HI 96814-2512

Dear Mr. Kitagawa:

Pre-Assessment Consultation for Environmental Assessment Hamakua Agricultural Park, Phase II Tax Map Key: 4-3-5: 2, Paauilo, Hamakua

In response to your August 5, 1993 letter, we provide you with the following land use information:

- 1. The subject property is situated within the State Land Use Agricultural and Conservation (Coastal Area) Districts.
- The County General Plan Land Use Pattern Allocation Guide (LUPAG) Map designates the area as Intensive and Extensive Agricultural, and Open Area along the coast.
- 3. Ordinance No. 91-132 was approved by the County Council effective December 27, 1991, which changed the district classification from Agricultural 40 acres (A-40a) to Agricultural 20,000 acres (A-20,000a).
- The area along the coast is situated within the Special Management Area.

Should you have any questions, please feel free to contact Alice Kawaha of this office at 961-8288.

Sincerely,

VIRGINIA GOLDSTEIN Planning Director

> AK:mjh 0664D

Manager and the second second



# DEPARTMENT OF WATER SUPPLY . COUNTY OF HAWAII

25 AUPUNI STREET . - LO. HAWAII 16720 TELEPHONE (808) 969-1421 . F4X (808) 969-6996

September 3, 1993

Dr. Paul J. Schwind Planning Program Director State of Hawaii Department of Agriculture 1428 South King Street Honolulu, HI 96814-2512

WATER AVAILABILITY
TAX MAP KEY 4-3-5:2

This is in response to your letter of August 5, 1993.

Please be informed that the subject property is not within the service limits of the Department's existing water system facilities.

Furthermore, the Department's water systems that do exist in adjacent areas are not capable of supporting the proposed agricultural park and subdivision at this time. Extensive improvements and additions, including source storage, transmission, booster pump, and distribution facilities, must be constructed. Currently, sufficient funding is not available and no time schedule is set.

Should you have any questions, please contact our Water Resources & Planning Section at 969-1421.

H. William Sewake Manager

WA

... Water brings progress...



REITH WI AMUE CHARPERSON BOARD OF LAND AND NATURAL RESCURCES

DEPUTIES JOHN P KEPPELER, II DONA L. HANAIKE

# STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. BOX 621 HONOLULU, HAWAII 96809

REF:OCEA:SKK

File No.: 94-084

DOC. ID.: 3511

AQUACULTURE DEVELOPMENT PROGRAM
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
CONSERVATION AND
ENVIRONMENTAL AFFAIRS
CONSERVATION AND RESOURCES ENFORCEMENT CONVEYANCES FORESTRY AND WILDLIFE HISTORIC PRESERVATION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

#### **MEMORANDUM**

TO:

فعمده والمتريد للعارض ورايئ رزوا بأوجيد

The Honorable Yukio Kitagawa, Chariperson

SEP 27 1993

Board of Agriculture

FROM:

Keith W. Ahue, Chairperson W. Board of Land and Natural Resources

SUBJECT:

Pre-Assessment Consultation for an Environmental Assessment

(EA): Hamakua Agricultural Park Phase II, Paauilo, Hawaii,

TMK: 4-3-05: 2

We have reviewed the information for the subject project transmitted by your memorandum dated August 5, 1993, and have the following comments:

## Office of Conservation and Environmental Affairs

The Office of Conservation and Environmental Affairs comments that the northern (makai) portion of parcel 2 is located within the Limited "L" subzone of the Conservation Ditrict. Any activites proposed within this area will be subject to the Conservation District regulations, Title 13, Chapter 2, Hawaii Administrative Rules (HAR).

We have no other comments to offer at this time. However, we reserve the opportunity to review the Draft EA for the agricultural park when it becomes available.

Thank you for the opportunity to comment on this matter.

Please feel free to call Steve Tagawa at our Office of Conservation and Environmental Affairs, at 587-0377, should you have any questions.

JOHN WAIHEE Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

YUKIO KITAGAWA Chairperson, Board of Agriculture

> ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honolulu, Hawaii 96823-2159

August 26, 1993

Dear Reviewer:

Hamakua Agricultural Park, Phase II Draft Environmental Assessment (EA) Tax Map Key: III-4-3-05: 02

The Department of Agriculture intends to issue sublicenses or revocable permits to qualified firms or individuals for diversified agricultural and pasture purposes on the approximately 418 acres of the Hamakua Agricultural Park, Phase II. This will be on an interim (two to three year) basis until the DOA receives title to the property as part of the Hamakua Sugar Company bankruptcy settlement agreement. The proposed uses may include but not be limited to demonstration projects for grass-fed "organic" beef, cultivation of tropical fruits and spices, raising of nursery stock plants, and experiments with new industrial crop varieties. These projects will make an immediate contribution to the economic recovery of the Hamakua region, in part through the receipt and expenditure of available Federal funds.

We enclose a copy of the Draft EA for the proposed action and would appreciate your comments by <u>September 30, 1993</u>, if possible. The official review period will end on October 8, 1993. Please send your comments to:

Dr. Paul J. Schwind Planning Program Administrator Department of Agriculture P.O. Box 22159 Honolulu, Hawaii 96823-2159

Thank you in advance for your participation in the planning process of this important project.

Sincerely,

YOKIO KITAGAWA, Chairperson

Board of Agriculture

Encl.





### STATE OF HAWAII DEPARTMENT OF EDUCATION

P. O. BOX 2350 HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

September 15, 1993

Dr. Paul J. Schwind Planning Program Administrator Department of Agriculture P. O. Box 22159 Honolulu, Hawaii 96823-2159

Dear Dr. Schwind:

SUBJECT: Hamakua Agricultural Park, Phase II Draft Environmental Assessment (EA)

TMK: III-4-3-05: 02

We have reviewed the subject EA and have determined that the proposed use of approximately 418 acres of land for diversified agriculture and pasture purposes will have no impact on the public school in the area.

Thank you for the opportunity to comment.

Sincerely,

Demental see Charles T. Toguchi Superintendent

CTT: hy

cc: A. Suga, OBS

A. Garson, HIDO

N.



### DEPARTMENT OF THE ARMY U. S. ARMY ENGINEER DISTRICT, HONOLULU FORT SHAFTER, HAWAII 96858-5440

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September 15, 1993

Planning Division

Mr. Yukio Kitagawa, Chairperson State of Hawaii Department of Agriculture 1428 South King Street Honolulu, Hawaii 96814-2512

Dear Mr. Kitagawa:

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Hamakua Agricultural Park (Phase II), Hamakua, Hawaii (TMK 4-3-5: por. 2). The following comments are provided pursuant to Corps of Engineers authorities to disseminate flood hazard information under the Flood Control Act of 1960 and to issue Department of the Army (DA) permits under the Clean Water Act; the Rivers and Harbors Act of 1899; and the Marine Protection, Research and Sanctuaries Act.

- a. Any work or structures performed below the ordinary high water mark of Kaunamano, Kaumoali, and Pohakuhaku gulches will require a DA permit. Please contact our Operations Division for further information at 438-8553 and refer to file number PO93-082.
- b. According to the enclosed Federal Emergency Management Agency's Flood Insurance Rate Map, panel 155166-0225-C dated September 16, 1988, the majority of the project area is located in Zone X (unshaded; areas determined to be outside of the 500-year flood plain). The project area along the coastline is located in Zone VE (special flood hazard areas inundated by the 100-year flood with velocity hazard and a base flood elevation of 16 feet above mean sea level). Should you require additional information regarding the flood hazard designations, please contact Ms. Jessie Dobinchick of our Planning Division at 438-7008.

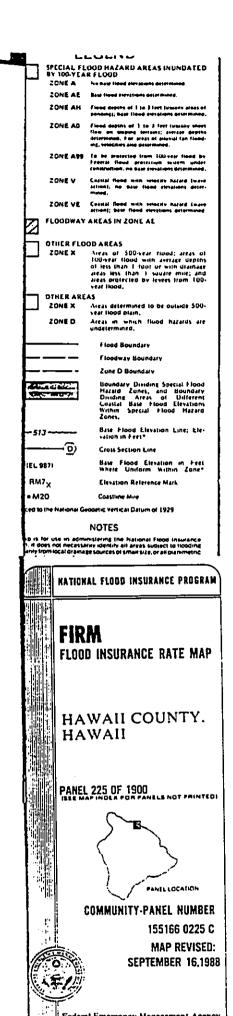
Sincerely,

Kisuk Cheung, P.E.

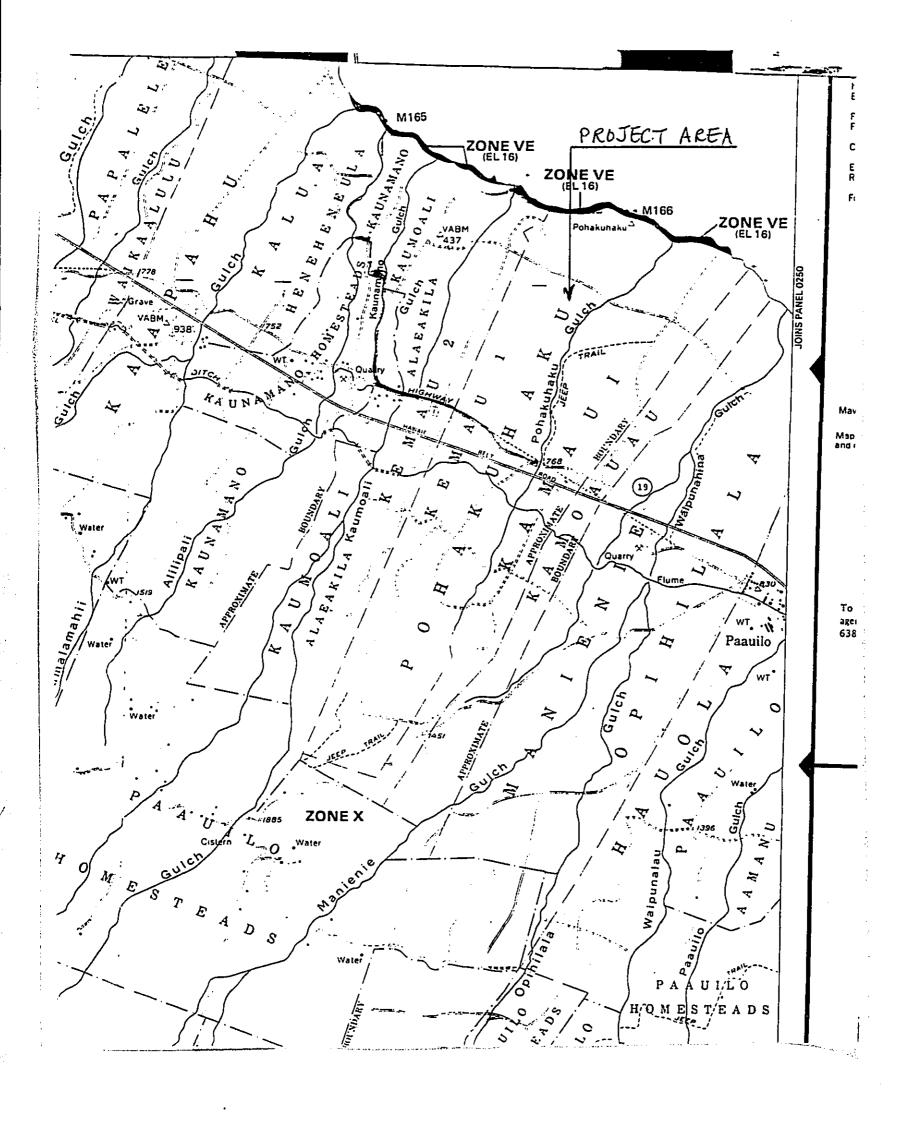
Director of Engineering

Enclosure

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State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

/UKIO KITAGAWA Chairperson, Board of Agriculture

ILIMA A. PIIANAIA Ceputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 monotulu, Hawaii 96823-2159

October 22, 1993

Mr. Kisuk Cheung, P. E. Director of Engineering U.S. Army Engineer District, Honolulu Department of the Army Fort Shafter, Hawaii 96858-5440

Dear Mr. Cheung:

This is to acknowledge your comments of September 15, 1993, on the Draft Environmental Assessment for the Hamakua Agricultural Park, Phase II.

The information which you provided regarding flood hazard designations will be included in the Final Environmental Assessment. No work or structures are planned below the ordinary high water mark of the gulches or in the coastline area.

We appreciate your review of the Draft Environmental Assessment.

Sincerely,

Paul. J. Schwind

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Planning Program Administrator



Mark Sirota P.O. Box 2792 Kamuela, Hawaii 96743 (h) 775-9420 (w) 885-7887

Dr. Paul J. Schwind Planning Program Administrator Department of Agriculture P.O. Box 22159 Honolulu, Hawaii 96823-2159

Ref: Hamakua Agricultural Park, Phase 2 Draft Environmental Assessment

Dear Dr. Schwind,

I would like to make several comments pertaining to the Hamakua Agricultural Park, Phase 2, Draft Environmental Assessment (EA). These comments also pertain to the Phase 1 Final Environmental Assessment, unfortunately I was not given a chance to submit comments on that document. In particular I am concerned about the odor and flies emanating from the cattle operations.

The draft EA indicates in several places that the odors and sounds associated with the park will not be a problem (pg7). In other places it seems to indicate that since the activity is significantly reduced from previous operations there should be no problems in regard to waste management (pg 14). The phase one FEA went as far as to state that no complaints were ever recorded while the operation was ongoing over the past six years, and the odors and insects were not a problem (pg 12, Phase one FEA). This is not true. Individual community members registered numerous complaints, mostly to the local Dept of Health and Big Island Meat. The odor was noticeable as far as Honokaa, five miles away.

I have enclosed a copy of a letter signed by over 80 community members who are concerned about this problem. I feel that it would be incorrect to release a final report prior to contacting the local health agencies and community members who have been effected in the past.

Although I am hopeful that the proposed operation, without the feedlot, will not be a problem, I feel that it is important to accurately record past problems. The EA should be updated, citing past problems, and properly address these concerns.

I look forward to your response.

Sincerely

Mark Sirota

cc: Mr. Yukio Kitagawa, Chairperson, Dept. of Agriculture Office of Environmental Quality Mr. Paul Matsuo, Dept. of Agriculture

Mr. Yukio Kitagawa Chairperson, Department of Agriculture 1428 South King Street Honolulu, Hawaii 96814

Dear Mr. Kitagawa,

The following position regarding the Paauilo slaughter-house and feedlot and its effect on the surrounding community was developed by the concerned individuals whose signatures appear below. Specifically, we are concerned with the offensive odor, proliferation of flies and other insects, and the general effect on the local environment. We are also concerned about the negative effect the feedlot may have on the community in terms of future residential or business development.

The frequency and intensity of the odor emanating from the feedlot in the past was, at times, unacceptable. The odor could often be noticed as far as Honokaa. The discomfort to the community members living in the Paauilo-Kalopa area was even greater. Often people couldn't enjoy the comfort of their own homes. The understanding we have is that the state wishes to re-open the slaughter-house and feedlot. We would like to work with the state to develop a feedlot maintenance and waste management program with the expectation that the odor and flies can be controlled allowing all members of the community to enjoy this beautiful area. To this end we propose the following recommendations.

- An acceptable feedlot maintenance and waste management program needs to be developed. The program will need to take into account the high amount of rainfall in the Paaulo area. The present feedlot design and maintenance program should be open to the public for review. Experts in the area of waste management should be consulted for comments. Suggested improvements to the feedlot infrastructure should be incorporated. Practices of the American Society of Agriculural Engineers should be followed. The key factor in minimizing the odor is drainage, since feedlot odor is directly correlated to moisture. Areas which should be addressed include, but are not limited to, the following:
  - 1.1 Drainage mechanisms including slope of feedlot, geometry, direction, and cleaning of drainage channels, sedimentation pond design and cleaning schedule, and holding pond design and cleaning schedule.
  - 1.2 Runoff pond drainage and aeration
  - 1.3 Manure collection schedule, procedure, and equipment
  - 1.4 Manure hauling plans and schedule
  - 1.5 Cattle density, ie: square foot per head of cattle
  - 1.6 Feed bunk construction, placement, and cleanup schedule
  - 1.7 Procedure and schedule for manure cleanup under fences
  - 1.8 Limiting discharge of effluent to levels set by the Environmental Protection Agency.
  - 1.9 Pen orientation with respect to the sun.
  - 1.10 Dead animal disposal

The intent of the maintenance program is to control the odor and flies in terms of frequency, intensity, duration and offensiveness.

- The community should be included in all decisions which may effect our lives. Specifically the community should be involved in the development of a maintenance program, expansion plans, plans for leasing or selling the feedlot, alternate locations, etc. The state should notify the community in a timely manner of any meetings dealing with the feedlot.
- We feel that the state is responsible to insure that the operation is run in a proper and acceptable manner. The state should provide a responsible representative for the community to address its concerns.
- If the slaughterhouse or feedlot is sold the state shall insure that the new owners are obligated to run it in an acceptable manner. A means of enforcing proper and acceptable operation should be provided as a condition of sale.
- The operation should be limited to cattle. Specifically, the operation shall not be expanded to include pigs.
- The odor emanating from a feedlot is directly correlated with the amount of rainfall. The amount of rainfall in Paquilo makes it a poor location. The accepted maintenance program will have to deal with this fact. It also has been shown that cattle production goes down with the amount of mud present. Given the number of people the feedlot effects and its poor location the state should discuss alternative locations or methods of satisfying the needs of the local cattle industry before the feedlot becomes a public nuisance.

(NoT) Enclosed is a copy of a feedlot waste management practice which should be used as a guideline for improving the feedlot design and developing a maintenance program. Our point of contact is Mark Sirota, telephone number 775-9420. We are looking forward to working together.

Thank You

Enclosures: Cattle Feedlot Waste Management Practices for Water and Air Pollution Control

CC:
Senator Malama Soloman
Representative Dwight Takamine
Mayor Stephen Yamashiro
Councilman Takashi Domingo
Mr. Harold Masumoto, State Planning Director
Hamakua District Development Council

**IGNATURE** PRINT NAME ADDRESS BEN YONEAH POB 733 HONOKAA HANKO YAMAMITO P.O.Bax 162 KAPAAU J. DAVId Richardson Box 2502 KAmyela. LEG PAPERNOW 130x 1787, Honolin, HZ KENNETH EBATA Heun Paptkia. Bx 1682 (Longtia) Rufeca S. Wanni P.O. BOX 1243 Horokaa KEISIE DEREGI Ba 1016 John. JAGG727 Justine N. DeKego 708 1016 Honokaa, 96727 Touis De Rogo Louis De Rego Box 1016 KonoKAA 9672 Box 1430 Honologe 46727 Dannison De Rego P.O. Box 1555 Kamuelat \$ 674 ell ORRego Synell Do Roge Box 1430 Honokag Hi 96127 Olyde Imola 8x 757 Henrikan 96727 DANIEL K. SABIN POB 1345 HONDKAD 9672 Thomas Boyer P.O.B 364 Honotaa, 96727 Faith RAPOZO P.O.BH393HornKaa ROY P.D. Box 761 HONORA, H. BOX 1226 HONOFTER

SIGNATURE	PRINT NAME	ADDRESS
Javan Winic	1- House's Wivie	FOR BOX BOZ
Royn R. Mark	ROGER R. MARTEN	P.O. Bax 382
Afthur E. Silva	Orthur E. Sloa	Howard 42- Donakac Hi 96727
Davidan FREITAS	DAMIAN FREITAS	P.O. Box 223 HONOKAA, HI. 96727
<b>~</b> .	THMMA P. FREITAS	PO BOX'223 HOUDKAA Hi. 96727
Janiel Freitax	DANIEL FREITAS	P.D. BOX 223 HONOKANHI. 96727
Jupne Okareli	JEROME AKASAK	1. P.A. Box 2/4 91776
	Karen Akasılı.	11
mar about		11
Park Under	Paul Brakacua	7.0. Box 84 Paquils, Hi 96776
Lana Azakawa	James Arakava	11
Marian K. Rapozo	Marian K. RAPEZO	PO.Box313 Honokan
Mu Haris	John (1 Rapozo	POBR 373 Horologa
Hem a Sa	MASON SOUZA	P.O. Box 1691 Hayoka
Welliam g Ferreire	William J Ferneira	Po. Box 48 PARILO
Bernetti & Jenevi	Bemadette J. Ferreira	
Perlita Jago	Perlita Yago	
Clarito Yago	Clarito Jago	<u>,,,</u>
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Dantellinas	Danette Minan	Box 312 Horokaa
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SIGNATURE	PRINT NAME	ADDRESS
Julan K Billings	LEILANI K BILLINGS	DO BOY 4 ODICHLAIT
- Jaidy		90 DD 1212 HONDRAM 962617
Don Hill	Don Uchilum	7030x1213+100kg +15672:
Henry Freetas	Herry L. FRESTAS	POBOX 576 HONOKAA, Hi 96727
Exertey S. Freeton		P.G. Bx 576 Honoback
Maile Oka	Mayle Oka	P.O. Bax 20 1 Hanoles
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SIGNATURE	PRINT NAME	ADDRESS
Mark fut	Mark Scrote	PO 2792, Kamuela
Middle Sinto	Michelle M. Sirita	P.C. POXZAZ, KANIUCIA
Mas / line	MILES T. HIRATA	P.O. Rox 1814 Alwoken
Joletto Bleet	Colette Hirala	44-2541 Kealua Rd
Hen J. Clarke	GEORGE T. ARAKAUM	7.0.385 PAAULLA
	DAVID AUDERSON	P.O. Bey 1487 HONOKAA.
Im Man		PD Box 430 Honolkan
Zui p Coan:	LESCIE S. WACHI	PO. BOD 27. HONOKAA.
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Jones Cornile	Janus Correin	P.O. BOX 443 Parilo
Earl De Lilia	EARL De SILVA	12
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State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honoiulu, Hawaii 96814-2512

/UKIO KITAGAWA
Chairperson, Board of Agriculture

ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honolulu, Hawaii 96823-2159

October 22, 1993

Mr. Mark Sirota P. O. Box 2792 Kamuela, Hawaii 96743

Dear Mr. Sirota:

This is to acknowledge your comments of September 26, 1993, on the Draft Environmental Assessment for the Hamakua Agricultural Park, Phase II.

The Final Environmental Assessment will be revised to indicate that odors and flies emanating from the cattle operations at the former feedlot were a major concern of the community, and the March 19, 1993, letter with 80 signatures will be included. Please note, however, that the feedlot waste management practices enclosure referred to in that letter has not been received.

The Department of Health has also received a copy of the Draft Environmental Assessment, and we await their comments.

We appreciate your review of the Draft Environmental Assessment.

Sincerely,

Paul J. Schwind

Planning Program Administrator

files - - Blevillani-

c: Mr. and Mrs. Alfred Cordeiro George T. Arakawa Ron Garten

THE MENT

In. Paul I Genwise Flanning Program Administrator Tepantment of Agricuiture
P.G. Fox 22159 Honolulu, Hawali 36823-2159

Ref: Hamakua Agricultural Park. Phase 2 Draft Environmental Assessment

Dear Dr. Schwind,

I would like to make several comments pertaining to the Hamakua Agricultural Park, Phase 2. Draft Environmental Assessment (EA). These comments also sentain to the Phase I Final Environmental assessment. Unfortunately I was not given a chance to submit comments on that document. In particular I am concerned about the odor and  $f^{\dagger}$ ies emanating from the cattle operations.

The draft EA indicates in several places that the odors and sounds associated with the park will not be a problem (597). other places it seems to indicate that since the activity is significantly reduced from previous operations there should be no problems in regard to waste management (pg 14). The phase one FEA went as far as to state that no complaints were ever recorded while the operation was ongoing over the past six years. and the odors and insects were not a problem (pg 12. Phase one FEA). This is not true. Individual community members, including myself, registered numerous complaints, adstly to the local Dept of Health and Big Island Meat. The odor was noticeable as far as fonomiae. Five miles away.

Although I am hopeful that the proposed operation, without the feedlot, will not be a problem. I feel that it is important to accurately record past problems. The EA should be updated. citing past problems. and properly address these concerns.

I look forward to your response.

Sincerely

Mr-Mr Mynd (ordine

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Londer Law rei 1812. co: Mn. Yukio Kitagawa. Chairsenson. Dept. of Agriculture Liberto de la companyone de la co Office of Environmental Quality

Mr. Paul Matsuo. Sept. of Agriculture

Geotomoer Ci. 1993

Dr. Faul I. Schwing
Planning Program Administrator
Department of Agriculture
P.O. Box 22159
Honolulu. Hawaii
94823-2159

Ref: Hamakua Agricultural Park. Phase I Draft Environmental Assessment

Dear Cr. Schwing.

I would like to make several comments certaining to the Hamakua Agricultural Park, Phase 2. Braft Environmental Assessment (EA). These comments also pertain to the Phase I Final Environmental Assessment. Enfortunately I was not given a chance to submit tomments on that document. In particular I am concerned about the coor and flies emanating from the cartle operations.

The snaft EA indicates in several places that the odors and sounds associated with the park will not be a problem (pg7). In other places it seems to indicate that since the activity is significantly reduced from previous operations there should be no problems in regard to waste management (pg 14). The phase one FEA went as far as to state that no complaints were ever recorded while the operation was ongoing over the past six years, and the odors and insects were not a problem (pg 12, Phase one FEA). This is not true. Individual community members, including avself, registered numerous complaints, mostly to the local Dept of Health and Big Island Meat. The odor was noticeable as far as minored. five with away.

Although I am hopeful that the proposed operation, without the feedlot, will not be a problem, I feel that it is important to accurately record past problems. The EA should be updated, citing past problems, and properly address these concerns.

I look forward to your response.

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cc:

Mr. Yukio Kitagawa, Chairperson, Dept. of Agriculture

Office of Environmental Quality

Mr. Paul Matsuo. Dept. of Agriculture

fdlt.o

## Panullo Maulta - Kalopa Community Association

P.O. Box 408 Paquilo, Hawaii 96776

Dr. Paul J. Schwind Planning Program Administrator Department of Agriculture P.O. Box 22159 Honolulu, Hawaii 96823-2159 September 27, 1993

Ref: Hamakua Agricultural Park, Phase 2
Druft Environmental Assessment

Dear Dr. Schwind

The Paauilo Mauka - Kalopa Community Association membership would like to make several comments regarding the Hamakua Agricultural Park, Phase 2, Draft Environmental Assessment. These comments also pertain to the Phase 1 Final Environmental Assessment. Unfortunately we did not have a chance to submit comments on that document. In particular, we are concerned about the odor and flies emanating from the cattle and slaughterhouse operations.

The draft EA indicates on page 7 that due to the sparse population surrounding the operation, odors will not be a problem. Comments on page 14 indicate that since the operation will be significantly reduced from capacity that there will be no problems with waste management. The phase one FEA stated that no complaints were ever recorded while the operation was on-going over the last six years, that odors will not emit outside site boundaries, and that there are no nearby residents (pg 12/13). This is not true. Individual community members registered continuous and numerous complaints, regarding the odor and flies, with Big Island Meats and the Department of Health. The odor was noticeable as far as Honokaa, five miles away. People with homes almost bordering the proposed park, found the odor and flies un-bearable.

We are supportive of the proposed operation, without the feedlot, if the odor and flies can be kept to an acceptable level and proper waste management practices are followed. We also feel that it is necessary and important to accurately record past problems. We feel that the EA and FEA should be updated to cite past problems and to properly address these concerns.

We hope that in the future we will be given chance to review, in a more timely manner, any documents that effect our local community. Mark Sirota (775-9420) is our point of contact.

We are looking forward to your reply.

Sincerely,

Ron Garten, President, Panuilo Mauka-Kalopa Community Association

cc:

Yukio Kitagawa, Chairperson, Department of Agriculture

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### STATE OF HAWAII DEPARTMENT OF TRANSPORTATION

869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

October 4, 1993

REX D. JOHNSON

DEPUTY DIRECTORS KANANI HOLT JOYCE T. OMINE AL PANG UU I CALVIN M. TSUDA

IN REPLY REFER TO:

STP 8.5512

TO:

The Honorable Yukio Kitagawa, Chairperson

Board of Agriculture

Rex D. Johnson

Director of Transportation

SUBJECT:

Draft Environmental Impact Statement - Hamakua Agricultural Park, Phase II

The continued use of the slaughterhouse operation and crop and livestock uses similar to those previously present on the property is not anticipated to have any significant impact on our

However, when the Department of Agriculture (DOA) receives title to the property and prepares the comprehensive plan for development of the entire 509-acre parcel as the Hamakua Agricultural Park, DOA should include a traffic impact analysis report in any environmental assessment prepared to determine if additional roadway and intersection improvements will be necessary. Any required roadway related improvements must be provided at no cost to the State Department of

We appreciate this opportunity to provide comments.

JAHN WAIHEE



State of Hawaii DEPARTMENT OF AGRICULTURE 1428 So. King Street Honolulu, Hawaii 96814-2512

**YUKIO KITAGAWA** Chairperson, Board of Agriculture

ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Hawaii 96823-2159

October 22, 1993

TO:

Al Pang

Deputy Director Primary

Department of Transportation

FROM:

Paul J. Schwind

Planning Program Administrator

SUBJECT:

Draft Environmental Assessment for Hamakua

Agricultural Park, Phase II

This is to acknowledge your comments of October 4, 1993, on the

As requested, when a comprehensive plan and environmental impact statement for the long-range development of the entire 509-acre parcel are prepared, a traffic impact analysis will be included to determine if additional roadway and intersection improvements

We appreciate your review of the Draft Environmental Assessment.





## University of Hawaii at Manoa

Environmental Center
A Unit of Water Resources Research Center
Crawford 317 • 2550 Campus Road • Honolulu. Hawaii 96822
Telephone: (808) 956-7361

October 7, 1993 EA:00032

Mr. Paul Schwind
Department of Agriculture
P.O. Box 22159
Honolulu, Hawaii 96823-2159

Dear Mr. Schwind:

Draft Environmental Assessment (EA) Hamakua Agricultural Park, Phase II Hamakua, Hawaii

The Department of Agriculture proposes to issue sublicenses or revocable permits to qualified firms or individuals for diversified agriculture and pasture purposes on the approximately 418 acres of the Hamakua Agricultural Park, Phase II. This will be on an interim (two to three year) basis until the DOA receives title to the property as part of the Hamakua Sugar Company bankruptcy settlement agreement. The proposed uses may include but not be limited to demonstration projects for grass-fed "organic" beef, cultivation of tropical fruits and spices, raising of nursery stock plants, and experiments with new industrial crop varieties. These uses represent a temporary continuation of crop and livestock production on the site at a less intensive level than its historic uses for sugarcane cultivation and cattle feedlot during which time herbicides were applied to the soil and animal wastewater was utilized for irrigation.

The Environmental Center has reviewed the Draft EA with the assistance of Yu-Si Fok and Henry Gee, Water Resources Research Center; and Andrew Tomlinson of the Environmental Center.

### General Comments

While we recognize the Department of Agriculture's intentions to contribute to the economic recovery of the Hamakua Region by promoting interim uses of the Hamakua Agricultural Park, we are concerned that the Draft EA for the proposed issuance of sublicenses and revocable permits for the two to three year development of "demonstration" agricultural and livestock projects is inadequate and should be expanded. Specifically, the document does not indicate the extent and scope of past agricultural and livestock uses of the Hamakua lands, and what the cumulative impact of these uses has been on the surrounding environment. Consequently, it is difficult to assess if the proposed demonstration projects represent a shift in the use of the agricultural lands from previous

Mr. Paul Schwind October 7, 1993 Page 2

uses. Ultimately, it is difficult to determine the potential environmental impacts of the proposed demonstration projects and therefore whether an EIA or an EIS should be prepared.

## Historical Uses of the Hamakua Lands

The document does not describe the full extent of the past agricultural uses of the lands at Hamakua and the specific environmental conditions existing. How was livestock cultivated at Hamakua and what were the specific numbers of cattle involved in past uses? How did agricultural cultivation and cattlefeed operations, including irrigation with wastewater, affect the soils and groundwater quality at Hamakua? How did sugarcane cultivation and cattlefeed operations contribute to erosion, and what erosion control measures were/will be utilized?

The Draft EA outlines the probable uses of the Hamakua Agricultural Park, Phase II lands but does not identify their relationship to the specific parcels of land. What were the uses of the Phase II lands prior to Hamakua's bankruptcy? Were cattlefeed operations conducted on these specific parcels of land or does the introduction of grass-fed cattle operations represent a shift in use? This is important due to the potential impacts associated with a shift from crop cultivation to cattle grazing including increased erosion and impacts to groundwater quality.

### Conclusion

The Draft EA does not provide sufficient information to render a determination of the significance of the potential environmental impacts of the proposed uses of the Hamakua lands. While there may not be significant potential environmental impacts related to the proposed demonstration projects and a negative declaration may be warranted, that decision can not be made on the basis of the content of present the Draft EA. The Draft EA should be expanded to include a complete discussion of the past uses and existing conditions of the agricultural lands at Hamakua.

Thank you for the opportunity to review this document. We hope our comments will be helpful in the preparation of the final document.

Sincerely.

Jacquelin N. Miller

Associate Environmental Coordinator

equelin n. Meller

cc:

OEQC Roger Fujioka Henry Gee Yu-Si Fok Andrew Tomlinson



State of Hawaii DEPARTMENT OF AGRICULTURE 1428 So. King Street Honolulu, Hawaii 96814-2512

rUKIO KITAGAWA Chairperson, Board of Agriculture

ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honolulu, Hawaii 96823-2159

October 22, 1993

Ms. Jacquelin N. Miller Associate Environmental Coordinator Environmental Center University of Hawaii at Manoa Crawford 317, 2550 Campus Road Honolulu, Hawaii 96822

Dear Ms. Miller:

This is to acknowledge your comments of October 7, 1993, on the Draft Environmental Assessment for the Hamakua Agricultural Park, Phase II.

As requested, the Final Environmental Assessment will be revised to include additional information on the past and present agricultural and livestock uses of the Hamakua lands, to enable a better assessment of the impacts of shifting the uses of these lands during the temporary demonstration projects. The relationship of the probable future uses of the agricultural park to specific parcels of land is already indicated in Figure 3 in the Draft EA.

We appreciate your review of the Draft Environmental Assessment.

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Sincerely,

The state of the s Paul J. Schwind

Planning Program Administrator



Stephen K. Yamashiro



Donna Fay K. Kivosaki Chief Engineer Riley W. Smith Deputy Chief Engineer

# County of Hawaii department of public works

25 Aupuni Street, Room 202 • Hilo, Hawaii 96720-4252 (808) 961-8321 • Fax (808) 969-7138

October 11, 1993

DR PAUL J SCHWIND
PLANNING PROGRAM ADMINISTRATOR
DEPT OF AGRICULTURE
P O BOX 22159
HONOLULU HI 96823-2159

SUBJECT:

Hamakua Agriculture Park, Phase II Draft Environmental Assessment (EA)

TMK: 3rd Div./4-3-05: 02

We have reviewed the draft environmental assessment and have the following comments:

- Provide a traffic impact analysis for the proposed project. At 100% development, what is the expected traffic impact?
- Prior to completion of the visitor center, improvements to the old Mamalahoa Highway fronting the proposed development shall be made to provide a minimum 18 feet wide pavement with minimum 2 feet wide shoulders on each side. Construction plans shall be submitted for review and approval.

Should you have any questions, please contact Stanley Takemura at 961-8327.

GALEN M. KUBA, Acting Division Chief

**Engineering Division** 

STT:st

cc: Planning Dept.



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

/UKIO KITAGAWA Chairperson, Board of Adriculture

ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honotulu, Hawaii 96823-2159

October 22, 1993

Mr. Galen M. Kuba Acting Division Chief Department of Public Works County of Hawaii 25 Aupuni Street, Room 202 Hilo, Hawaii 96720-4252

Dear Mr. Kuba:

This is to acknowledge your comments of October 11, 1993, on the Draft Environmental Assessment for the Hamakua Agricultural Park, Phase II.

When a comprehensive plan and environmental impact statement for the long-range development of the entire 509-acre parcel are prepared, a traffic impact analysis will be included to determine if additional roadway and intersection improvements will be necessary.

Your request to review and approve construction plans for improvements to the old Mamalahoa Highway fronting the proposed development is duly noted.

We appreciate your review of the Draft Environmental Assessment.

Sincerely,

Paul J. Schwind

Planning Program Administrator

A MAN

JOHN WAIHEE



STATE OF HAWAII DEPARTMENT OF HEALTH

> P. O. SOX 3378 HONOLULU, HAWAII 95801

JOHN: C: LEWIN. M.D.

DIRECTOR OF HEALTH

In reply, please refer to:

October 19, 1993

93-052/epo

To:

The Honorable Yukio Kitagawa, Chairperson

Board of Agriculture

Attn: Mr. Paul J. Schwind

Planning Program Administrator

From:

John C. Lewin, M.D. Sunskhaler

Director of Health

Subject:

Draft Environmental Assessment (DEA) Hamakua Agricultural Park, Phase II,

Paauilo, County of Hawaii

TMK: 4-3-5: 2

Thank you for allowing us to review and comment on the subject document. In addition to our comments dated May 5, 1993, we are offering these comments:

### Wastewater

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The State proposes to issue sublicenses or revocable permits to qualified firms or individuals for diversified agricultural and pasture purposes on the approximately 418 acres of the Hamakua Agricultural Park, Phase II.

The subject project is located above the Underground Injection Control (UIC) line (contrary to Section II.C., "Environmental," 4th sentence). Two aquifer types underlying the project site were identified: 1) An unconfined flank basal aquifer identified as a fresh drinking water resource currently in use and moderately vulnerable to contamination, and 2) A unconfined high-level perched aquifer identified as a potential fresh drinking water resource and highly vulnerable to contamination.

Plans indicate that an approved on-site potable water well will be surrounded by the various agricultural activities. A comprehensive waste, wastewater, fertilizer, and chemical management program designed to protect this water resource should be a priority and reviewed by the Department of Health.

Pumping the waste pond(s) to maintain the water level(s) during rainy periods (as indicated in Section III.C., "Flora and Fauna," 4th sentence) is inconsistent with accepted practices. The purpose of the waste and runoff holding ponds is to store waste-contaminated water during the rainy periods to be reused at recommended crop agronomic nutrient/water rates during rainy periods. For this purpose, the waste storage pond(s) should be designed,

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The Honorable Yukio Kitagawa October 19, 1993 Page 2

constructed and operated to contain all process generated waste waters, plus the waste contaminated runoff from a 25-year, 24-hour rainfall event at the location of the Agricultural Park.

It is stated in the DEA that "There are no residents or any urban type activity in the general vicinity of this site." Therefore, there is no anticipation of domestic wastewater generation and thus domestic wastewater disposal has not been addressed in the document.

However, it is further stated that "The number of persons who will be employed in the Phase II project area in the interim agricultural activities, which are the subject of this assessment, is not known, but will probably be from 10 to 15." We feel that sanitary facilities are necessary for the employees working in this area. Therefore, we will require a review of a document addressing wastewater treatment and disposal. At a minimum, a portable type toilet facility (comfort station) is suggested. An operation and maintenance program must also be developed to maintain sanitary conditions.

In addition to domestic wastewater, the Department is concerned with wastewater generated from agricultural activities. We will require each farm activity to submit wastewater treatment and disposal plans to the Department for review and approval.

All wastewater and sludge management plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems."

If you should have any questions on this matter, please contact Mr. David Yamamoto or Ms. Lori Kajiwara of the Wastewater Branch at 586-4290.

### Nonpoint Source Pollution Concerns

The Hamakua Agricultural Park is located on a site with slopes ranging between 10 to 30 percent. Runoff from the agricultural park drains to the coastal waters. Steps should be taken to minimize on-site erosion and nutrient runoff, which may become a source for nonpoint source pollution.

Proper planning, design and use of erosion control measures and management practices substantially reduces the total volume of runoff generated, thereby decreasing sediment, nutrient and pesticide loads. With planning assistance from the U.S.Department of Agriculture Soil Conservation Service, we encourage developing an overall conservation plan for the entire 509 acre agricultural park that will address natural resources management.

If you should have any questions on this matter, please contact Ms. Shirley Nakamura of the Environmental Planning Office at 586-4337.

c: Wastewater Branch Environmental Planning Office SVERNOR OF HAWAII



JOHN C. LEWIN. M.D. SIRECTOR OF HEALTH

A

## STATE OF HAWAII 93 .... 7 A.9: 22

DEPARTMENT OF HEALTH

3. O. BOX 3378 -GNOLULU. HAWAII 96801

n repty, please refer to:

May 5, 1993

93-052/epo

To:

The Honorable Yukio Kitagawa, Chairperson

Board of Agriculture

From:

John C. Lewin, M.D. Sund Anderson for

Director of Health

lubject:

Pre-Assessment Consultation for Environmental Assessment Hamakua Agricultural Park, Paauilo, County of Hawali

500 acre parcel

Thank you for allowing us to review and comment on the subject request.

Your letter of February 18, 1993 is requesting comments on the existing slaughterhouse operation before preparing an environmental assessment. You have already received comments (letter dated March 30, 1993) directly from Mr. William Wong, Chief of our Safe Orinking Water Branch. We are offering additional comments at this time.

### Wastewater

Without the details of current domestic and animal wastewater treatment and disposal systems, our office cannot give an adequate assessment of the subject project. However, we do have the following general comments to offer:

- The subject project is located above the Underground Injection Control (UIC) Line and within a non-critical wastewater disposal area as determined by the Hawaii County Wastewater Advisory Committee. Constructing or expanding waste/wastewater disposal systems are restricted and require approval from the Department of
- We are in the process of developing wastewater sludge (beneficial 2. use and reuse) guidelines, animal waste management guidelines, wastewater effluent reuse guidelines and associated programs. As these regulations and guidelines are developed, present requirements may be changed as deemed necessary.
- In reviewing the project, the Wastewater Branch will recommend approval of a slaughternouse operation as long as both domestic and animal wastewater is treated and disposed of according to our Department of Health's (DOH) Administrative Rules, Chapter 11-62, "Wastewater Systems."

The Honorable Yokio Kitagawa May 5, 1993 Page 2

We appreciate your efforts to keep us informed of changes and plans concerning Big Island Meat slaughterhouse, feed lot, and other associated aspects of an agricultural park. We support Hamakua's Agricultural Park concept, however, we do reserve the right to review the detailed wastewater and wastewater sludge management plans for conformance to applicable rules and guidelines.

Our goal in the near future is to formally extend DOH's services to include agricultural activities. Revisions to rules will be implemented as determined appropriate through documented information. The details of our upcoming program and its implementation are largely dependent on available personnel and budget constraints. We invite you to actively participate in the development and enforcement of our environmental management responsibilities.

If you should have any further questions or concerns, please feel free to contact Dennis Tulang, Chief of our Wastewater Branch at 586-4294.

### Water Pollution

The Department of Health exempted the Hamakua Feedlot from NPDES permit requirements in 1986. However, the Department would like to review the Environmental Assessment to determine if the exemptions are still appropriate for the Hamakua Agricultural Park.

If you should have any questions on this matter, please contact Mr. Devender Narala of the Clean Water Branch at 586-4309.

C: Wastewater Branch Clean Water Branch JOHN WAIHEE Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE 1428 So. King Street Honolulu, Hawaii 96814-2512

YUKIO KITAGAWA Chairperson, Board of Agriculture

ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honolulu, Hawaii 96823-2159

October 26, 1993

TO:

Bruce S. Anderson

Deputy Director for Environmental Health

Department of Health

FROM:

Paul J. Schwind

Planning Program Administrator

SUBJECT:

Draft Environmental Assessment for Hamakua

Agricultural Park, Phase II

This is to acknowledge your comments of October 19, 1993, on the above captioned document.

The Final Environmental Assessment will be corrected to indicate that the project area is located above the Underground Injection Control (UIC) line, and to delete reference to pumping the waste pond(s) to maintain the water level(s) during rainy periods. It will be clarified that all waste waters and contaminated runoff from a 25-year, 24-hour storm event must be contained, for which purpose the permittee(s) must submit a wastewater treatment and disposal plan acceptable to your Department, and conform to Chapter 11-62, Hawaii Administrative Rules. In addition, portable sanitary facilities may be required for employees.

We appreciate your review of the Draft Environmental Assessment.

Agricultural Resource Management Division



OHN WAIHEE

### MAJOR GENERAL EDWARD V RICHARDSON

ROY C. PRICE, SR. VICE DIRECTOR OF CMIL DEPENSE





#### STATE OF HAWAII

DEPARTMENT OF DEFENSE OFFICE OF THE DIRECTOR OF CIVIL DEFENSE

> 1949 DIAMOND HEAD ROAD HONOLULU, HAWAII 95816-4495

October 22, 1993

OCT 2 6 1999

T0:

Dr. Paul J. Schwind

Planning Program Administrator

Department of Agriculture

FROM:

Roy C. Price, Sr. Vice Director of Civil Defense

**SUBJECT:** 

HAMAKUA AGRICULTURAL PARK, PHASE II; DRAFT ENVIRONMENTAL

ASSESSMENT (DEA)

We appreciate this opportunity to comment on the DEA by the Department of Agriculture, State of Hawaii, on the island of Hawaii, District of Hamakua, Hamakua Agricultural Park, Phase II, TMK: 4-3-05: por. 2, 3rd Division.

While we do not have negative comments specifically directed at the DEA, we do have a proposal that entails the addition of at least one new indoor siren simulator device and the siren simulator support infrastructure to be purchased and installed by the developer. The location of the simulator normally is in any 24-hour manned office. However, for the Hamakua Agricultural Park, any office that is manned during their normal working hours can be used, for example, the Visitor Center.

A siren simulator is a large, suitcase size portable siren, complete with built-in battery backup power. This device is triggered by the same radio system that triggers the outdoor sirens. The installation of such a device consists of a siren simulator, an antenna, an antenna cable duct, 110-volt AC electrical power and a backup source for AC electrical power, if one is available. The design for the antenna cable would typically provide ducting from the ground floor level to the rooftop.

Dr. Paul J. Schwind October 22, 1993 Page 2

Additionally, this location may be a suitable site for a facility to house a Limited Automated Remote Collector (LARC) rain gauge. A LARC provides real-time remote rainfall data collection and information. This addition would enhance the existing rainfall LARC system and the National Weather Service (NWS) and State Civil Defense's (SCD) ability to plan for the safety and well-being of the population at risk. SCD will recommend that NWS assess the location for future use as a LARC site.

The impact of natural hazards posing a threat to the location should be evaluated. With the land slope ranging from 10 to 30 percent and the slope of the gulches ranging from 35 to 70 percent, terrain amplification of high winds as well as heavy rainfall associated with tropical cyclones and hurricanes need to be addressed. Structures built within the project area should be designed and constructed to resist the potentially destructive winds based on the elevation and slope. These structures could then be surveyed for use as potential shelters.

Our SCD planners and technicians are available to discuss this further if there is a requirement. Please have your staff call Mr. Mel Nishihara of my staff at 734-2161.



State of Hawaii DEPARTMENT OF AGRICULTURE 1428 So. King Street Honolulu, Hawaii 96814-2512

YUKIO KITAGAWA Chairperson, Board of Agriculture

> ILIMA A. PIIANAIA Deputy to the Chairperson

FAX: (808) 973-9613

Mailing Address: P. O. Box 22159 Honolulu, Hawaii 96823-2159

October 26, 1993

TO:

Roy C. Price, Sr.

Vice Director of Civil Defense

Department of Defense

FROM:

Paul J. Schwind

Planning Program Administrator

SUBJECT:

Draft Environmental Assessment for Hamakua

Agricultural Park, Phase II

This is to acknowledge your comments of October 22, 1993, on the above captioned document.

Inasmuch as the proposed interim uses of the project site will represent a temporary continuation of crop and livestock production for which no permanent structures or improvements will be constructed, a siren simulator device and support infrastructure may not be feasible at this time in the Phase II area. This issue, along with the possibility of structures for use as potential shelters, can be considered at a later date when we prepare a more detailed assessment for the long-range development and use of the property. Alternatively, you may wish to approach the operator of the existing slaughterhouse (Hawaii Beef Packers, Inc.) in the Phase I area to see if they could accommodate the installation you propose.

If the National Weather Service determines that this location would be a suitable site for a Limited Automatic Remote Collector (LARC) rain gauge, we would welcome their proposal to that effect.

We appreciate your review of the Draft Environmental Assessment.

c: Agricultural Resource Management Division

