

MAR 08 2011

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

REFUSE DIVISION

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PETER B. CARLISLE
MAYOR



RECEIVED

TIMOTHY E. STEINBERGER, P.E.
DIRECTOR

'11 FEB 24 A9 55

WILMA NAMUMNART, P.E.
ACTING CHIEF

IN REPLY REFER TO:
RE 11-011

REC. OF ENVIRONMENTAL
QUALITY CONTROL

February 23, 2011

Mr. Gary Hooser, Director
State of Hawaii
Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawaii 96813

Subject: Environmental Impact Statement Preparation Notice for an In-Vessel
Composting Facility, Waialua, Oahu, Hawaii

Dear Mr. Hooser:

The City and County of Honolulu Department of Environmental Services (ENV) submits the enclosed Environmental Impact Statement Preparation Notice (EISPN) which has been prepared to meet the content requirements for EISPN specified in Chapter 343, Hawaii Revised Statutes and Chapter 11-200-2, Hawaii Administrative Rules. We request that you please publish the notice of this EISPN in the March 8, 2011 issue of *The Environmental Notice*.

Enclosed are the following items:

- One (1) CD including the EISPN and the Office of Environmental Quality and Control publication form in PDF format; and
- One (1) hardcopy of the EISPN

If you have any questions, please call Steven Serikaku of the ENV Refuse Division at 768-3428.

Sincerely,

Timothy E. Steinberger, P.E.
Director

Enclosures

cc: Mr. Earl Matsukawa, Wilson Okamoto Corporation

*Environmental Assessment/
Environmental Impact Statement Preparation Notice*

*IN-VESSEL COMPOSTING FACILITY
Waialua, Oahu, Hawaii*

*Applicant:
Hawaiian Earth Recycling LLC*

*Approving Agency:
Department of Environmental Services
City & County of Honolulu*

*Prepared by:
Wilson Okamoto Corporation*

February 2011

**ENVIRONMENTAL ASSESSMENT/
ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE**

IN-VESSEL COMPOSTING FACILITY
Waialua, Oahu, Hawaii

Applicant:
Hawaiian Earth Recycling LLC

Approving Agency:
Department of Environmental Services
City & County of Honolulu

Prepared by:
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February 2011

TABLE OF CONTENTS

	<u>Page</u>
PREFACE	P-1
SUMMARY.....	S-1
1.0 INTRODUCTION	1-1
1.1 Background.....	1-1
1.2 Project Location	1-1
1.3 Purpose and Project Need.....	1-1
2.0 PROJECT DESCRIPTION	2-1
2.1 No Action	2-1
2.2 Proposed Action	2-1
2.3 Project Schedule and Cost	2-3
3.0 DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES	3-1
3.1 Climate.....	3-1
3.2 Geology, Topography, and Soils.....	3-1
3.3 Hydrology.....	3-6
3.3.1 Ground Water	3-6
3.3.2 Surface Water.....	3-7
3.4 Flood Hazard	3-8
3.5 Flora and Fauna	3-9
3.6 Air Quality	3-9
3.7 Noise.....	3-11
3.8 Archaeological and Cultural Resources	3-12
3.9 Traffic.....	3-12
3.10 Socio-Economic Characteristics	3-12
3.11 Public Services	3-14
3.12 Infrastructure.....	3-14
4.0 RELATIONSHIP TO LAND USE, POLICIES AND CONTROLS	4-1
4.1 State of Hawaii.....	4-1
4.1.1 Hawaii State Plan	4-1
4.1.2 State Land Use District	4-2
4.2 City and County of Honolulu	4-2
4.2.1 General Plan.....	4-2
4.2.2 Development and Sustainable Communities Plan	4-5
4.2.2.1 North Shore Sustainable Communities Plan	4-5
4.2.3 Land Use Ordinance and Zoning.....	4-8
4.2.4 Special Management Area	4-8

TABLE OF CONTENTS (continued)

	<u>Page</u>
5.0 CHAPTER 200, TITLE 11, SIGNIFICANCE CRITERIA	5-1
6.0 LIST OF PERMIT APPROVALS	6-1
7.0 CONSULTATION	7-1
7.1 Pre-Assessment Consultation.....	7-1
7.2 Parties to be Consulted During the Draft EA.....	7-2
8.0 REFERENCES	8-1

List of Figures

Figure 1-1	Location Map	1-3
Figure 1-2	Tax Map Key.....	1-4
Figure 1-3	Project Site Photos	1-5
Figure 1-4	Surrounding Uses Map	1-7
Figure 2-1	Site Plan	2-5
Figure 2-2	In-Vessel Composting Process.....	2-7
Figure 2-3	Example of Composting Facility in Everett, Washington.....	2-8
Figure 3-1	Soils Map.....	3-3
Figure 3-2	Land Study Bureau Map	3-4
Figure 3-3	Agricultural Lands of Importance in the State of Hawaii (ALISH) Map....	3-5
Figure 4-1	State Land Use District Map	4-3
Figure 4-2	City & County of Honolulu Zoning Map.....	4-9

List of Tables

Table 3-1	State and Federal Ambient Air Quality Standards	3-9
Table 3-2	Demographic Characteristics: 2000.....	3-13

Appendices

Appendix A	Pre-Assessment Consultation Letters
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PREFACE

Hawaiian Earth Recycling LLC (HER) proposes to construct and operate an in-vessel composting facility in the rural area between Wahiawa and Waialua on the island of Oahu. The proposed project site is located on land owned by Cedar Grove Hawaii LLC and encompasses approximately 112 acres.

The proposed project is not subject to the environmental documentation requirements prescribed under Chapter 343, Environmental Impact Statements, Hawaii Revised Statutes (as amended) and Hawaii Administrative Rules Chapter 200 (Environmental Impact Statement Rules) Title 11, of the State of Hawaii Department of Health as amended (State of Hawaii 1996). Nevertheless, as a part of the contractual requirements between the City and County of Honolulu Department of Environment Services (ENV) and Hawaiian Earth Recycling LLC (HER), these environmental documentation requirements will be followed for this project.

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SUMMARY

APPLICANT: Hawaiian Earth Recycling LLC
91-400 Malakole Street
Kapolei, Hawaii 96707
Contact: Mr. Gregory Apa

ACCEPTING AGENCY: Environmental Services Department
City & County of Honolulu
1000 Ulohia Street, Suite 308
Kapolei, Hawaii 96707
Contact: Mr. Stephen Serikaku

AUTHORIZED AGENT: Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826
Contact: Ms. Tracy Fukuda
Phone: 808-946-2277

PROJECT LOCATION: Waialua, Oahu, Hawaii

TAX MAP KEY: 6-5-002: 026

AREA: Approximately 112 acres

EXISTING USE: Agricultural lands

**STATE LAND USE
DESIGNATION:** Agricultural

ZONING DESIGNATION: Agriculture (AG-2)

**SUSTAINABLE
COMMUNITIES PLAN
DESIGNATION:** Agriculture

PROPOSED ACTION: Construct and operate an in-vessel composting facility that will process green waste, food waste, and dewatered sewage sludge and produce marketable products such as compost, soil amendments, potting mixes, and erosion control materials.

DETERMINATION: The project is not subject to the environmental documentation requirements prescribed under Chapter 343, Environmental Impact Statements,

Hawaii Revised Statutes (as amended) and Hawaii Administrative Rules Chapter 200 (Environmental Impact Statement Rules) Title 11, of the State of Hawaii Department of Health as amended (State of Hawaii 1996). Nevertheless, as a part of the contractual requirements between the ENV and Hawaiian Earth Recycling LLC, these environmental documentation requirements will be followed for this project.

**PARTIES CONSULTED DURING
PRE-ASSESSMENT
CONSULTATION:**

Federal

U.S. Fish & Wildlife Service
Schofield Barracks

State

Department of Agriculture
Department of Accounting & General Services
Department of Business, Economic Development &
Tourism (DBEDT)
DBEDT, Office of Planning
DBEDT, Energy Division
Department of Health
Department of Land & Natural Resources (DLNR)
DLNR, State Historic Preservation Division
Office of Hawaiian Affairs
Department of Transportation
Department of Hawaiian Home Lands

City & County of Honolulu

Board of Water Supply
Department of Planning & Permitting
Department of Transportation Services
North Shore Neighborhood Board
Wahiawa – Whitmore Village Neighborhood Board

Elected Officials

Representative Marcus Oshiro, District 39
Representative Gil Riviere, District 46
Senator Donavon Dela Cruz, District 22
Councilmember Ernie Martin, District 2

Other

Castle & Cooke

1.0 INTRODUCTION

1.1 Background

Hawaiian Earth Recycling LLC (HER) proposes to construct and operate an in-vessel (enclosed) composting facility in Waialua on the island of Oahu (see Figure 1-1). Currently, the City and County of Honolulu's (C&C) Curbside Green Waste Collection Program; individual homeowners; commercial tree trimmers and landscape maintenance contractors, and governmental property maintenance agencies deliver green wastes to one of two Hawaiian Earth Products' (HEP is an affiliated company of HER) Department of Health (DOH)-permitted composting/transfer locations, located at Campbell Industrial Park and Kapaa Quarry, respectively. HEP also composts pre-consumer food waste at Campbell Industrial Park. HEP recycles over 85,000 tons of green waste per year from both facilities, however HEP is able to process up to 136,000 tons per year at Campbell Industrial Park.

1.2 Project Location

Hawaiian Earth Recycling LLC (HER) proposes to construct an in-vessel (enclosed) composting facility in Waialua on the island of Oahu, as shown in Figure 1-1). The project site is located on Tax Map Key (TMK) 6-5-002: 026, owned by Cedar Grove Hawaii LLC and encompasses approximately 112 acres (see Figure 1-2). The project site lies on a gentle grade (940 foot elevation), with steep slopes and gullies near Kaukonahua Gulch. The lowest point of the property is at the southeastern end at approximately 800 feet. The project site has been fallow since late 2004. HEP currently has existing open windrow composting operations (DOH Permit No. CO-0091-08) (see Figure 1-3).

The project site is surrounded by Agricultural and Military Preservation zoned land. It is bordered by Wilikina Drive and agricultural lands to the north and agricultural lands to the east and west (see Figure 1-4). Along the southern boundary are more agricultural lands. Beyond the southern agricultural lands are Kaukonahua Gulch located 1/4-mile away and Schofield Barracks across from Kaukonahua Gulch, with nearest structures approximately one mile from southern boundary of project site.

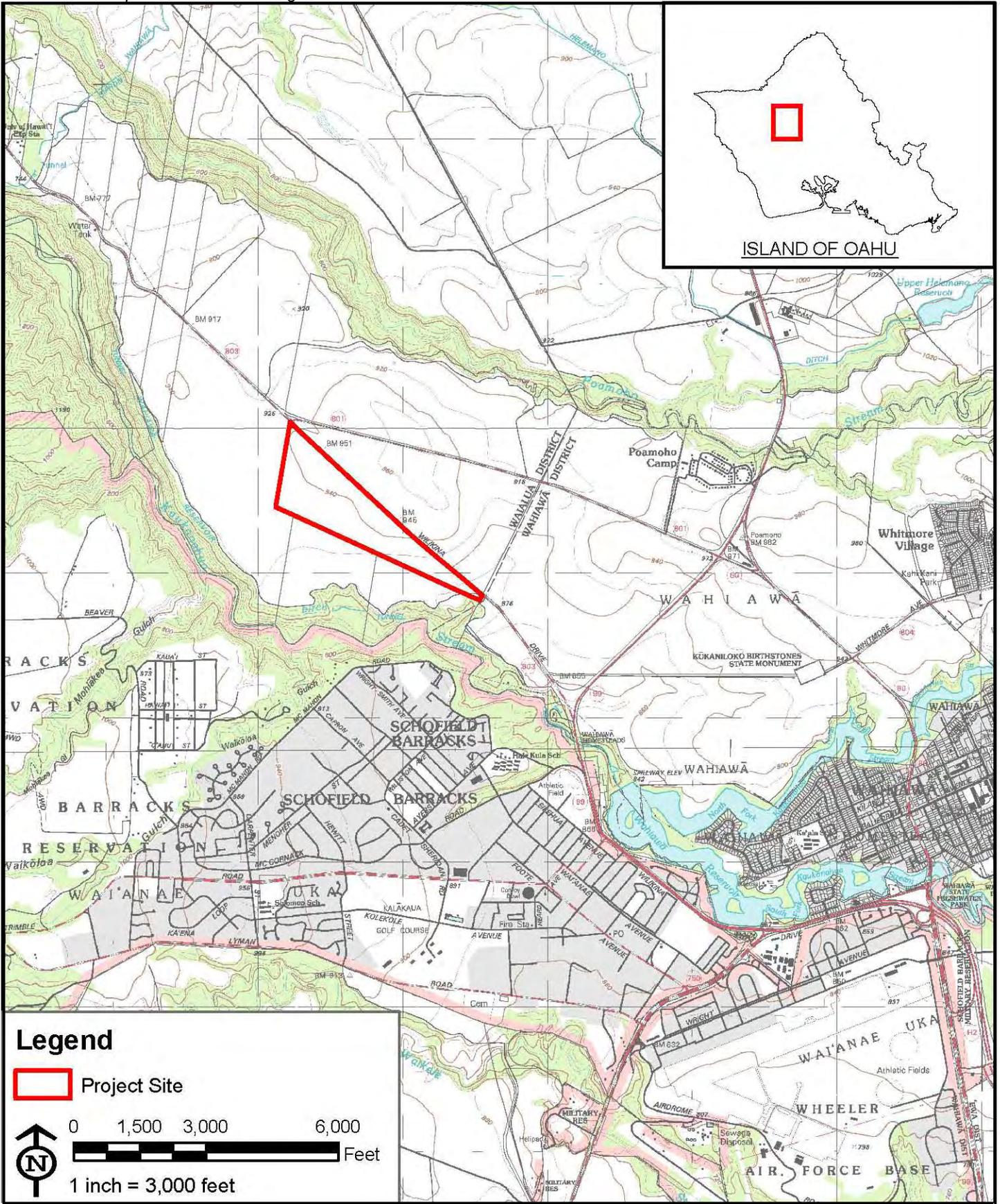
1.3 Purpose and Project Need

HER currently leases approximately 39 acres at Campbell Industrial Park for their existing composting operations. The lease expires in 2015 and the amount of lands that can be leased will be reduced to 14 acres. As a result, HER must relocate their composting operations and downsize current operations at Campbell Industrial Park. HER will continue to operate at Campbell Industrial Park and Kapaa Quarry as transfer stations.

The proposed site in Waialua is an ideal location for HER's composting operations as it will be centrally located to Oahu's agricultural industry. HER produces organic products that would be utilized by the agricultural industry. The soils have been stripped of

nutrients from decades of sugar cane and pineapple cultivation and the use of chemical fertilizers. The agricultural industry would have much more access to these organic soil amendments with the project's location.

As mentioned earlier, HEP recycles over 85,000 tons of green wastes and pre-consumer food per year from both facilities. By recycling and reusing organic materials, this waste which once was disposed of at Oahu's only landfill is being turned into a beneficial product, such as, compost, soil amendments, potting mixes, fertilizer replacement/enhancement, gardening and landscaping products. This Project will be an important and integral component of Oahu's overall Solid Waste Management System, as private companies, such as HEP, assist the City and County of Honolulu's efforts to direct materials for reuse. Without this composting facility, these recyclable materials would be disposed of in Oahu's only landfill.

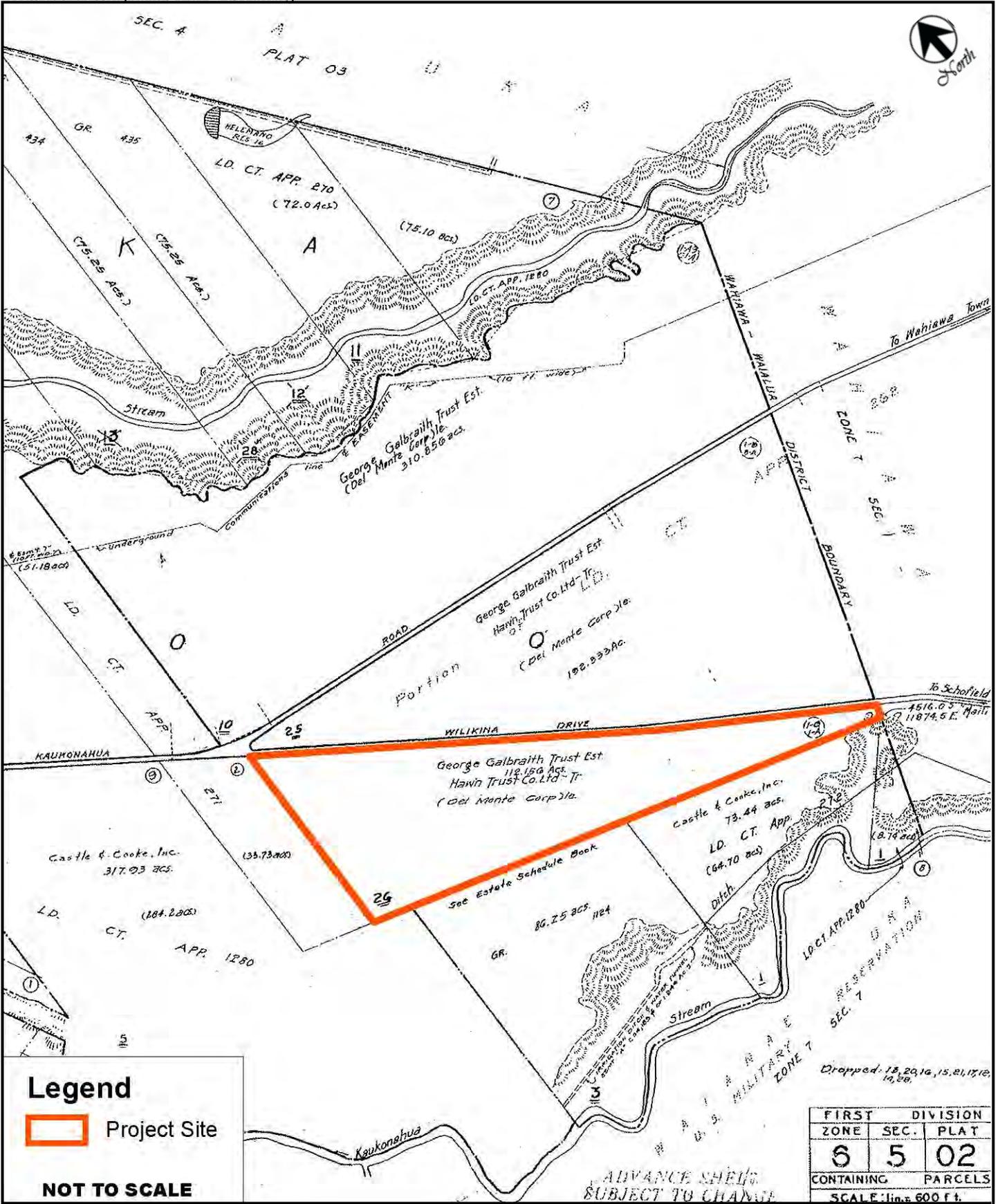


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 Project Site

 0 1,500 3,000 6,000 Feet

1 inch = 3,000 feet



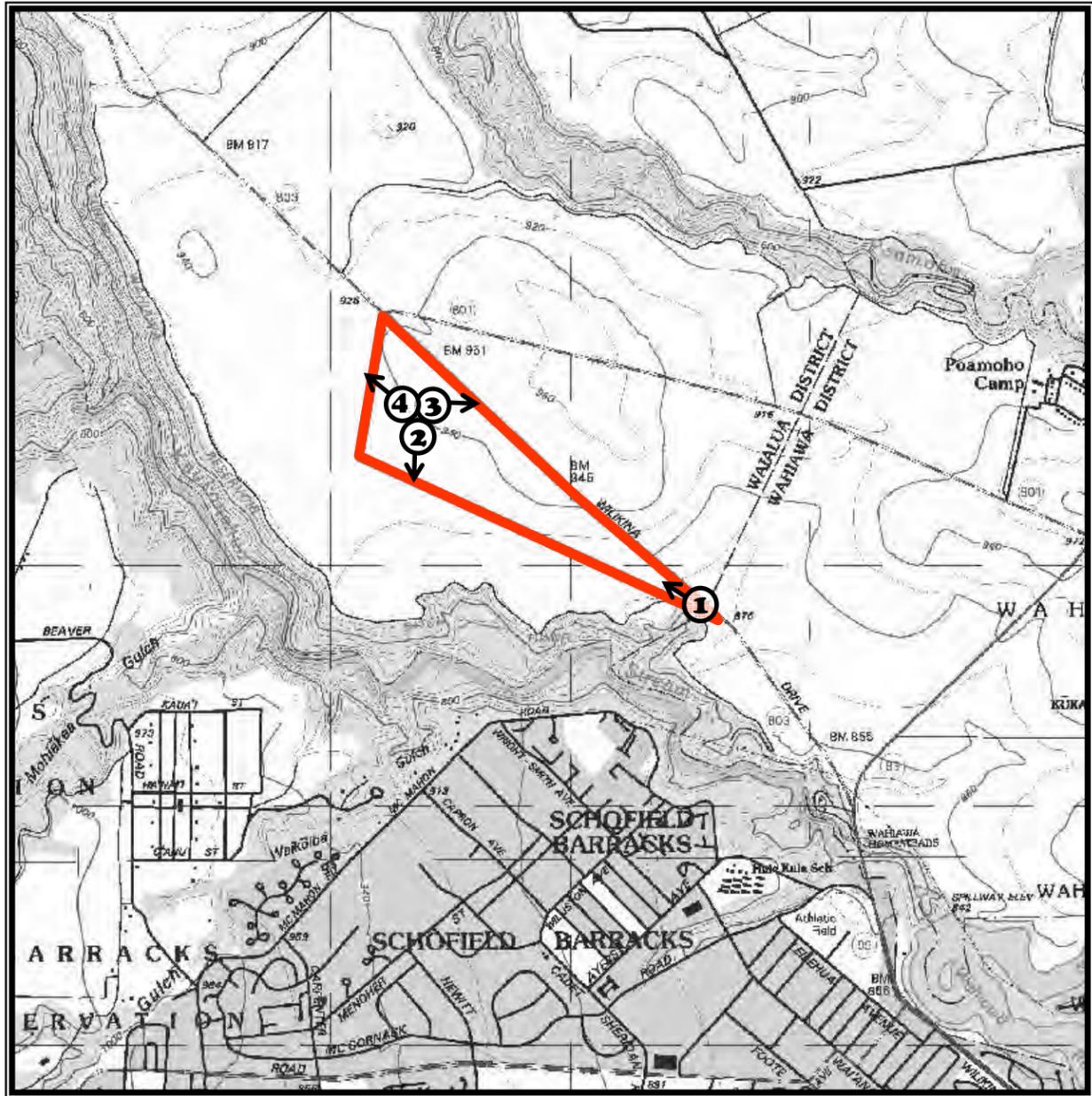
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 Project Site

NOT TO SCALE

FIRST DIVISION		
ZONE	SEC.	PLAT
6	5	02
CONTAINING		PARCELS
SCALE: 1 in. = 600 ft.		

 WILSON OKAMOTO CORPORATION ENGINEERS • PLANNERS	IN-VESSEL COMPOSTING FACILITY	FIGURE 1-2
	TAX MAP KEY 6-5-02: 026	



NOT TO SCALE

Legend

 North

 Project Site

①



②



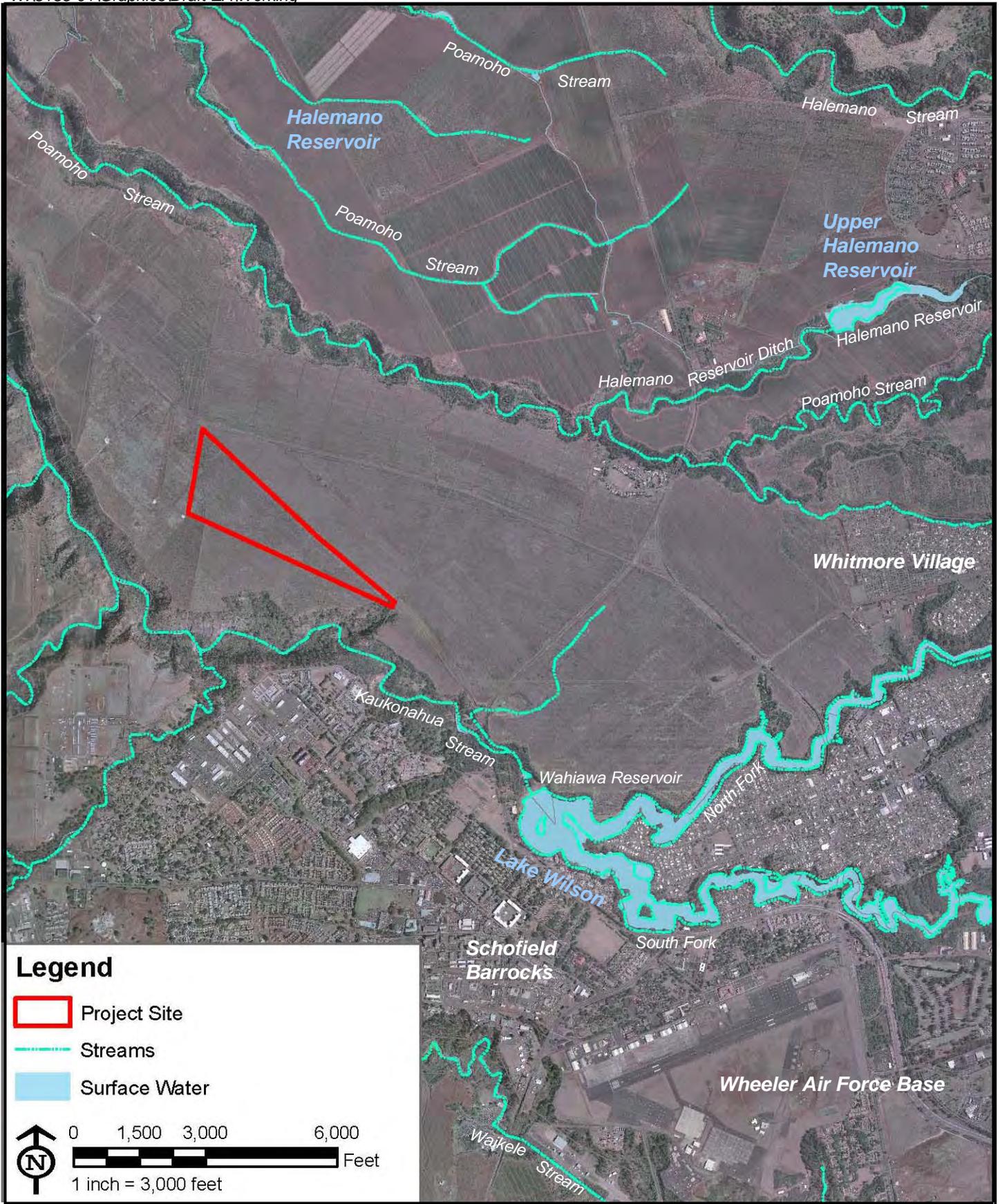
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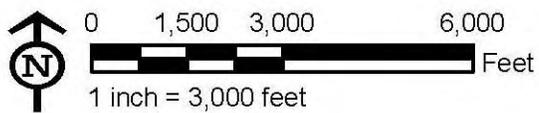


Legend

 Project Site

 Streams

 Surface Water



IN-VESSEL COMPOSTING FACILITY

SURROUNDING LAND USES

FIGURE

1-4

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2.0 PROJECT DESCRIPTION

2.1 No Action

The No Action alternative would involve not constructing a new composting facility in Waialua. The 85,000 tons per year of green and food wastes would not be reused beneficially and disposed of in Oahu's only landfill.

2.2 Alternative Site

Property owned by the City and County of Honolulu was considered for the project. The alternative site encompasses 8.65 acres and is further identified as TMK: 9-1-026: 035, adjacent to the Covanta Waste to Energy Plant in Campbell Industrial Park. This site was eliminated because it was too small to accommodate the compost volumes and a protected plant species is located on the parcel where it divides the property making it more difficult to operate a composting facility.

2.3 Proposed Action

The proposed in-vessel composting facility will process up to 150,000 tons per year (TPY) of green waste, food waste, and dewatered sewage sludge and produce marketable products such as compost, soil amendments, potting mixes, and erosion control materials. By weight, this total amount is estimated to consist of approximately 70 to 80 percent green waste, 5 to 10 percent food waste and 15 to 20 percent dewatered sewage sludge. Food waste will be delivered from a soon to be developed City and County of Honolulu (CCH) food waste collection program and the dewatered sewage sludge will come from the CCH's Honouliuli and Kailua Regional Wastewater Treatment Facilities. In the future, dewatered sewage sludge may come from other potential facilities.

The in-vessel composting facility will utilize the GORE™ Cover System for the composting process. The GORE™ Cover System ("System") technology is a widely used composting system in the United States and the world with more than 150 operating systems world-wide. The System is suitable for varied climate conditions and is highly effective in managing and controlling odors and emissions.

The in-vessel composting facility will consist of the following: truck weighing scale; enclosed receiving building for sorting and processing, open composting area where the System will be installed; stormwater retention pond; leachate storage tank; and, open product storage area (see Figures 2-1 and 2-2). These facilities will encompass approximately 38 acres of the 112 acre parcel. The remainder is used for the existing open windrow composting operations (green waste only) and will be utilized to demonstrate using compost to assist crop production.

The System's composting process is summarized as follows and depicted in Figure 2-2. Incoming vehicles will be weighed and enter the enclosed receiving building where the vehicles will be unloaded, or "tipped." The receiving building will encompass

approximately 20,000 square feet of land and stand 38 feet high. The building will accommodate temporary storage (up to two days of incoming materials) and preparation of the incoming materials. The receiving facility will operate under a negative air system, which will remove odors with the use of biofilters. The use of biofilters will control odors within the confines of the receiving building. The building's concrete floor slab will be impermeable and designed to collect all leachate generated inside the facility. This leachate will be collected and stored in an enclosed double-walled storage tank on-site. The collected leachate will be reused by mixing it in with the materials to be composted.

Within the receiving building, incoming materials will be separated into two areas 1) green and food waste, and 2) dewatered sewage sludge. The incoming materials are prepared by removing non-compostable debris and mixed to create two processing streams, one that contains dewatered sewage sludge and one that does not. The green and food waste is loaded into a grinder located in the receiving building. The grinder shreds the waste into mulch. From the building, each stream will be transported to a specially designed GORE™ Cover System concrete slab for composting. The entire GORE™ pad consists of an impermeable concrete or asphalt slab, which allows for the collection of all stormwater and leachate generated under the GORE™ Cover.

The segregated materials will be placed on either of two GORE™ pads (one for materials containing dewatered sewage sludge and the other for material with green and food waste) and arranged in windrows over an imbedded air distribution channels that aerate the composting material and collect leachate generated. The dimension of each GORE™ pad is 500 feet by 354 feet (177,000 square feet). Each GORE™ pad can accommodate up to 32 windrows. Each windrow is approximately 26 feet wide at the base, 164 feet long and 10 feet in height, and contains approximately 1,000 cubic yards of composting material. Each windrow will be covered by a GORE™ Cover fabric, which will be secured around each windrow perimeter, hence the reference to "in-vessel" (enclosed) composting.

The patented GORE™ Cover fabric has the unique property of allowing water vapor to pass through it and yet it will shed rainfall. The GORE™ Cover will also control dust and vectors are kept out of the composting material. Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The GORE™ Cover provides separation of stormwater and leachate. The leachate will be handled in the aforementioned leachate collection system and is separated from the stormwater collection system.

After each succeeding stage of composting, the composted materials will be transported, mixed and reformed into windrows on another area of the concrete slab, re-covered and allowed to further decompose. Throughout this process, the two streams of materials (with or without sewage sludge) remain segregated.

In the first phase, the material will be allowed to aerobically decompose for 21-28 days under the GORE™ Cover (Steps 1 and 2 as shown in Figure 2-2). From phase 1, the material will be moved to phase 2, also undercover for an additional two weeks, then moved to a third and final phase uncovered for an additional two weeks (see Steps 3 – 5 in Figure 2-2).

The fully composted and stable material will be screened, tested to insure the product meet EPA standards, packaged, and distributed to end users. Finished material for sale includes soil conditioners, compost and mulches. The material will also be sold in bulk.

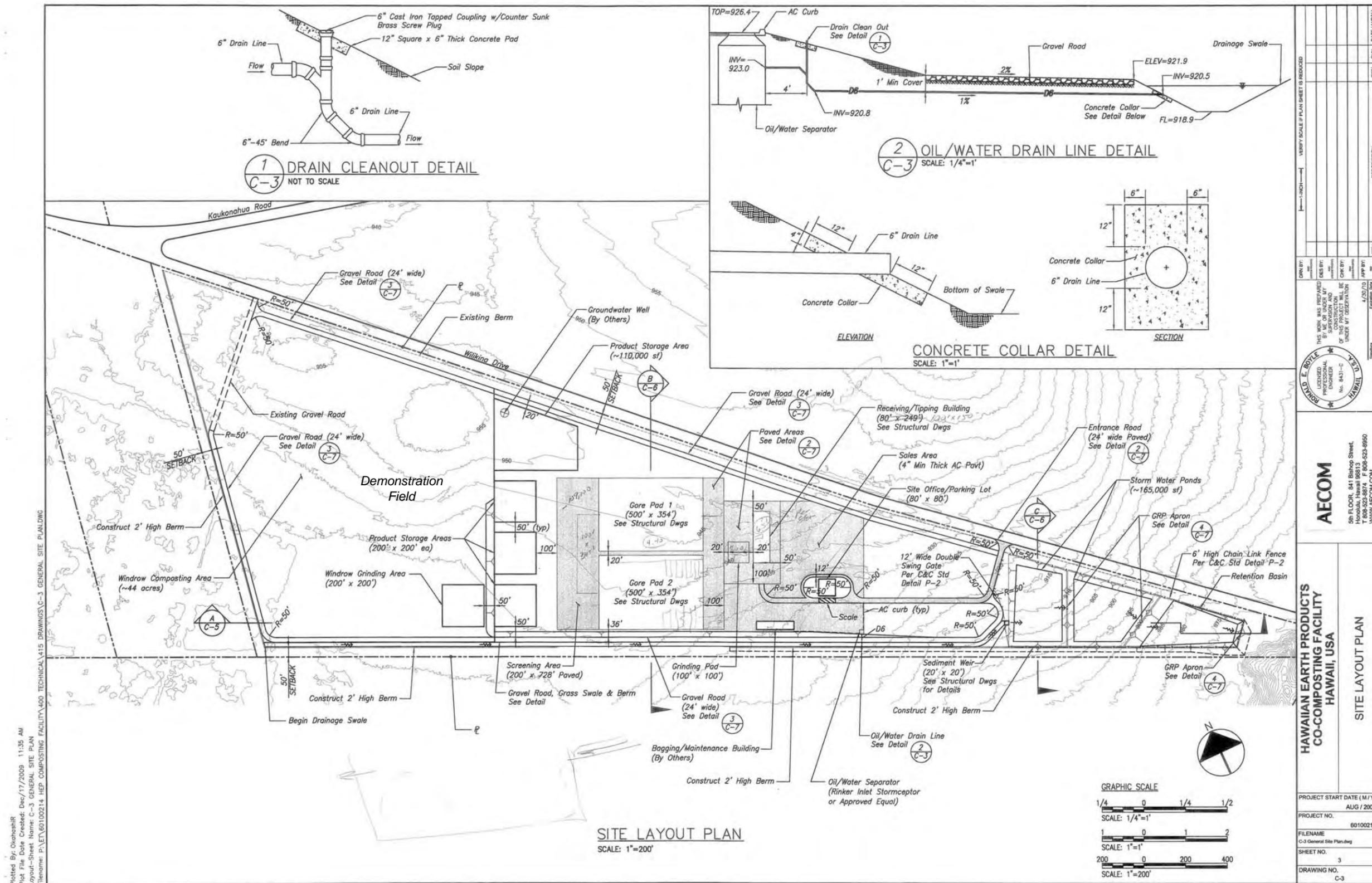
As previously mentioned, rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The stormwater collected will be insufficient for the composting operation and supplemental water will be drawn from an on-site well. A well will be drilled and a pump installed.

In addition to the composting facility, an area on the northwestern portion of the project site will be used as a crop production and demonstration field. The field will be farmed using the finished product to demonstrate how it can be used as a valuable soil amendment.

2.4 Project Schedule and Cost

Construction of the project is planned to commence once this environmental document is completed, other environmental clearances are obtained, and ministerial permits obtained. Construction of the proposed facility is anticipated to take approximately one year. The estimated construction cost is \$40 million.

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DRN BY:	DES BY:	CHK BY:	APP BY:	DATE (MM/YY):
THIS WORK WAS PREPARED BY ME OR UNDER MY CLOSE PERSONAL SUPERVISION AND I AM A LICENSED PROFESSIONAL ENGINEER IN THE STATE OF HAWAII.				
E. BOYLE LICENSED PROFESSIONAL ENGINEER No. 4431-C HAWAII				
AECOM 5th Floor, 441 Bishop Street, Honolulu, HI 96813 T 808-523-8974 F 808-523-8960 WWW.AECOM.COM				
HAWAIIAN EARTH PRODUCTS CO-COMPOSTING FACILITY HAWAII, USA				
SITE LAYOUT PLAN				
PROJECT START DATE (M/Y): AUG / 2009				
PROJECT NO.: 60100214				
FILENAME: C-3 General Site Plan.dwg				
SHEET NO.: 3				
DRAWING NO.: C-3				

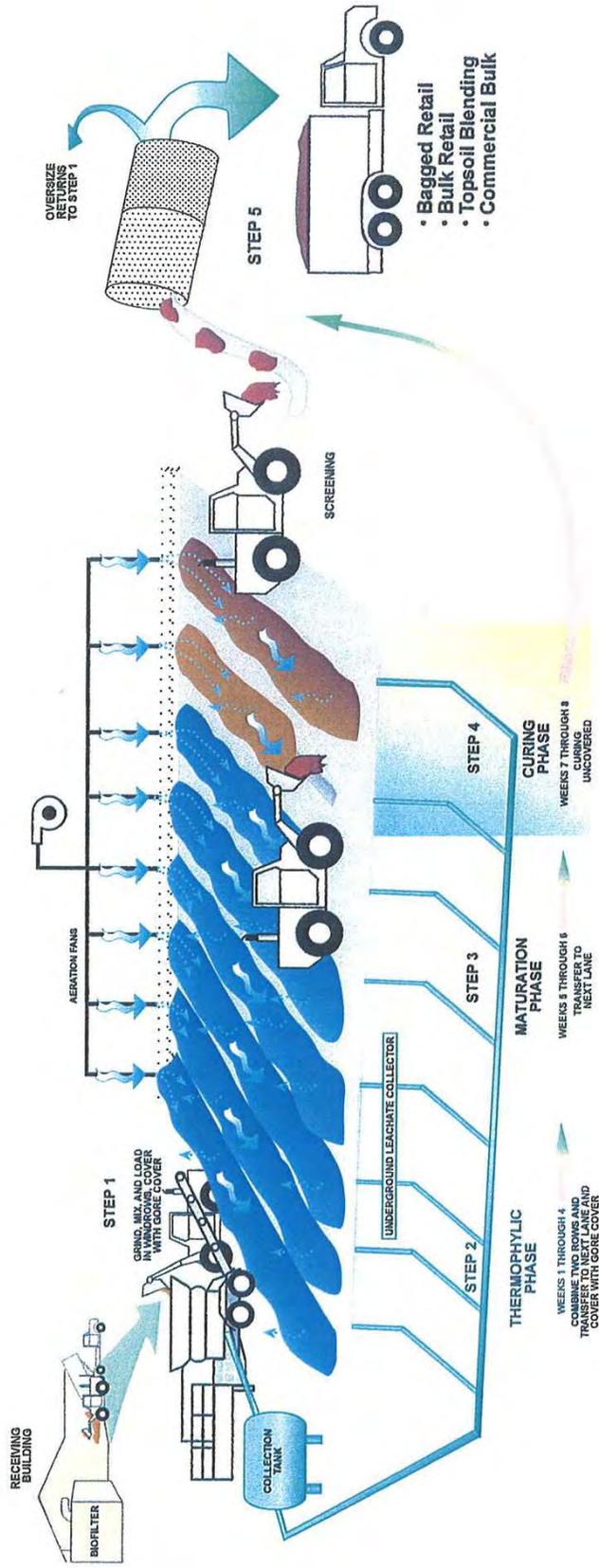
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IN-VESSEL COMPOSTING FACILITY
SITE PLAN

FIGURE
2-1

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Process Pictogram

IN-VESSEL COMPOSTING FACILITY

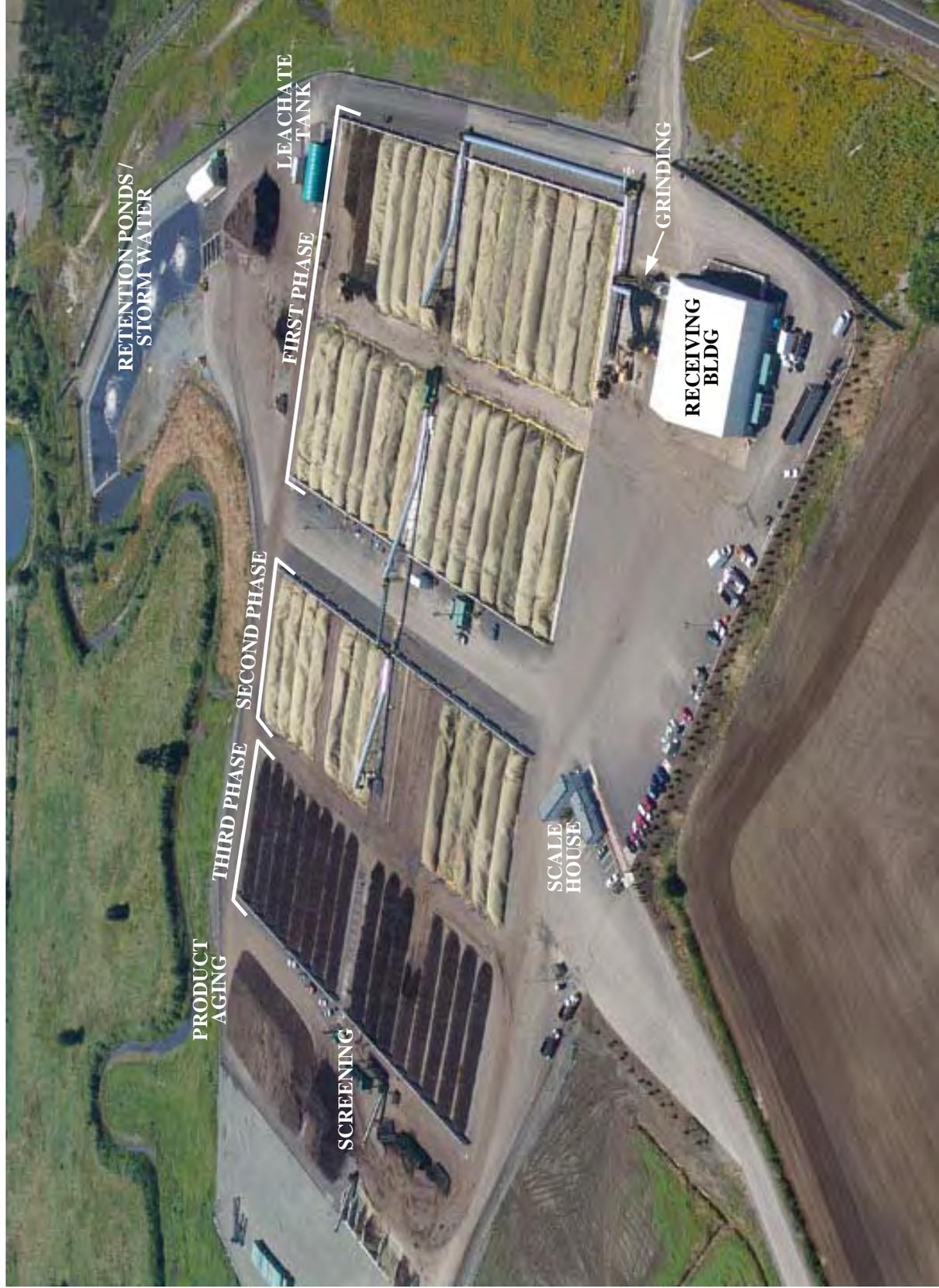
IN-VESSEL COMPOSTING PROCESS

FIGURE

2-2



WILSON OKAMOTO CORPORATION
ENGINEERS • PLANNERS



3.0 DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES

The following is a description of the existing environment, assessment of potential impacts and proposed measures to mitigate potential adverse impacts resulting from the project.

3.1 Climate

The climate of Oahu is characterized by abundant sunshine, persistent tradewinds, relatively uniform temperatures, moderate humidity, and infrequent storms throughout the year.

Northeasterly trade winds prevail throughout the year. The mean temperature measured at Honolulu International Airport ranges from 70 degrees Fahrenheit (°F) in the winter to 84 °F in the summer. The project site has an average annual rainfall of 69.63 inches. 24 hour storm rainfall is as follows 10 year – 7 inches; 25 year – 12 inches; 100 year- 14 inches. Relative humidity ranges between 70 to 80 percent.

Impacts and Mitigation Measures

The proposed facilities will not affect regional climate; however, replacing the undeveloped project site with GORE™ pads, a receiving building, compost product storage area, and retention ponds may alter the microclimate of the site.

3.2 Geology, Topography, and Soils

The island of Oahu was formed by two shield volcanoes which are now the Koolau Range on the east and the Waianae Range on the west. Lava from the younger Koolau Volcano banked against the already eroded flank of the Waianae Volcano to form the gently sloping surface of the Schofield Plateau. Due to erosion, both ranges have lost most of their original shield shape and now appear as long narrow ridges (Stearns, 1985).

The project site lies on a gentle grade (940 foot elevation), with steep slopes and gullies near Kaukonahua Gulch to the south/southwest and Poamoho Gulch to the north. The lowest point of the property is at the southeastern end at approximately 800 feet. The project site has been highly disturbed due to years of agricultural use.

According to the U.S. Natural Resources Conservation Service (1972), the soils in the project site belong to the Helemano-Wahiawa association, "*Deep, nearly level to moderately sloping, well drained soils that have a fine textured subsoil; on uplands.*"

The following soil types are found in the project area (see Figure 3-1):

- Wahiawa silty clay, 0 to 3 percent slopes (WaA) – This soil is similar to Makalapa clay, 2 to 6 percent slopes, except that it occurs on fans. This soil occurs on smooth, broad interfluves. In a representative profile the surface layer is very dusky

red and dusky red silty clay about 12 inches thick. Permeability is moderately rapid. Runoff is slow, and the erosion hazard is no more than slight.

- Wahiawa silty clay, 3 to 8 percent slopes (WaB) – On this soil, runoff is slow and the erosion hazard is slight. This soil is used for sugarcane, pineapple, and pasture.
- Helemano silty clay, 30 to 90 percent slopes (HLMG) – This soil is on the sides of V-shaped gulches. In a representative profile the surface layer is dark reddish-brown silty clay about 10 inches thick. Permeability is moderately rapid. Runoff is medium to very severe.

The *Detailed Land Classification – Island of Oahu* published by the University of Hawaii Land Study Bureau (LSB) (1972), evaluates the quality of productive capacity of certain lands on Oahu for selected crops and overall suitability in agricultural use. A five class productivity rating system was established with “A” representing the highest productivity and “E” the lowest. Majority of the project site is rated “B”. The “B” rating indicates good productivity for most agricultural uses (see Figure 3-2). A very small portion is rated “E.”

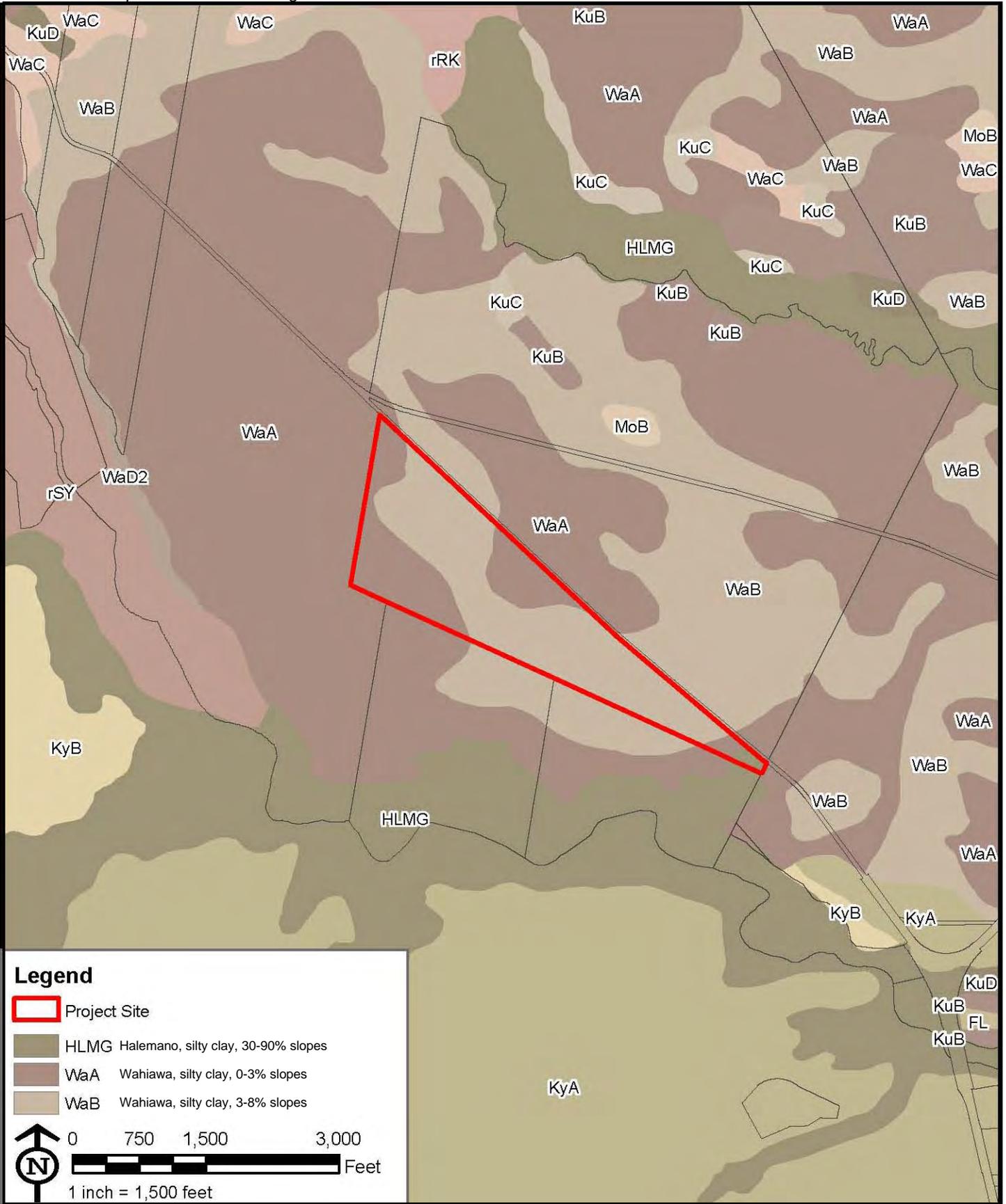
The *Agricultural Lands of Importance in the State of Hawaii (ALISH) Map*, prepared by the State Department of Agriculture, classifies lands into three categories: 1) prime agricultural land, 2) unique agricultural land, and 3) other important agricultural land. Most of the project site is classified as “unique agricultural land” (see Figure 3-3).

Impacts and Mitigation Measures

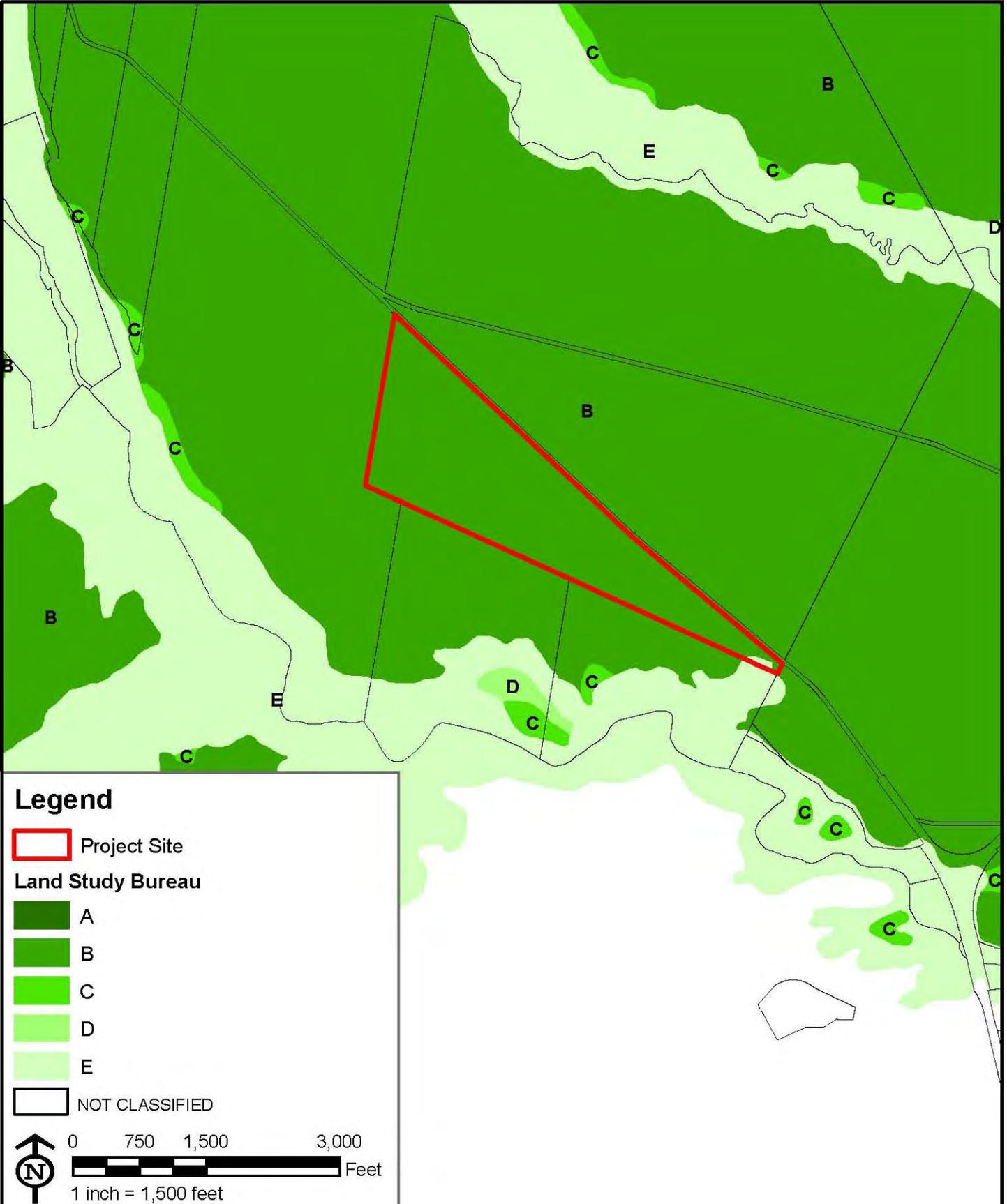
No significant impact on the geology, overall topography, or soils of the project site is anticipated during the construction of the proposed facilities. Construction of the proposed facilities will require grading activities and excavation for building foundations, concrete pads for windrow system and utilities. The lowest elevation of the site layout is 875 feet. Graded and excavated areas will be built-over, paved-over, or backfilled and landscaped.

Excavation and grading activities associated with construction will be in compliance with the City and County of Honolulu grading ordinance and the National Pollutant Discharge Elimination System (NPDES) permit program administered by the State Department of Health (DOH).

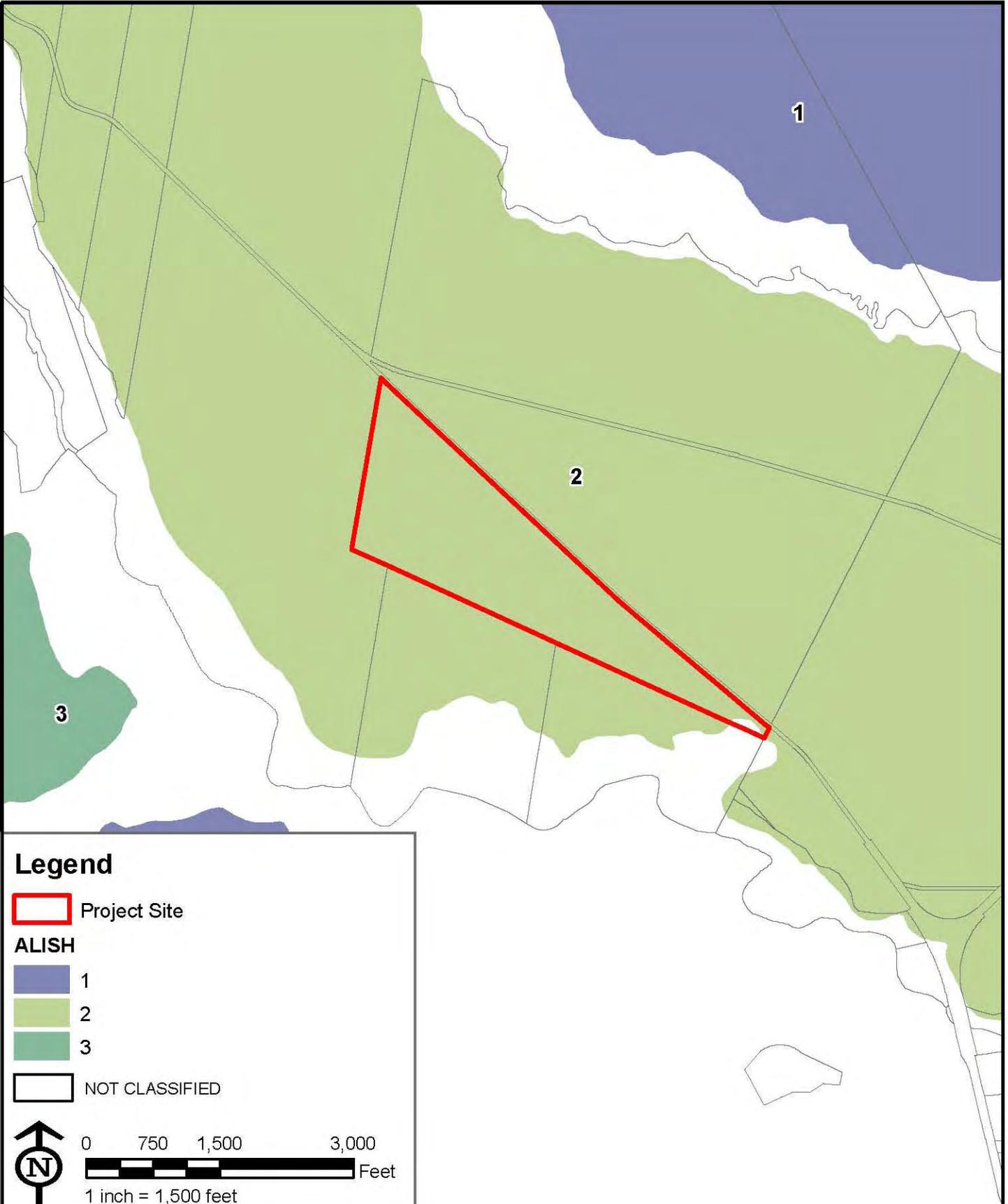
A NPDES Notice of Intent (NOI) for Storm Water Associated with Construction Activities will be required for construction of the project as the area of soil disturbance from activities such as clearing and grading will be in excess of one acre. The permit requires site-specific Best Management Practices (BMP) Plan which, in turn requires compliance with City ordinances pertaining to grading, grubbing, stockpiling, soil erosion and sedimentation. Site-specific erosion and sediment control measures of the BMP plan may include construction of berms to detain run-off and installation of silt fences to filter silt from run-off.



 WILSON OKAMOTO CORPORATION ENGINEERS • PLANNERS	IN-VESSEL COMPOSTING FACILITY	FIGURE 3-1
	SOILS MAP	



 WILSON OKAMOTO CORPORATION ENGINEERS • PLANNERS	IN-VESSEL COMPOSTING FACILITY	FIGURE 3-2
	LAND STUDY BUREAU MAP (LSB)	



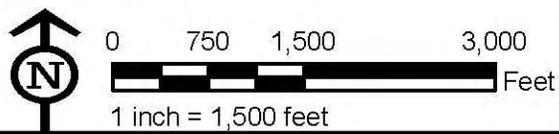
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 Project Site

ALISH

-  1
-  2
-  3

 NOT CLASSIFIED



IN-VESSEL COMPOSTING FACILITY

AGRICULTURAL LAND OF IMPORTANCE IN HAWAII (ALISH) MAP

FIGURE

3-3

To minimize potential short-term erosion impacts during construction activities, various erosion control measures are available for implementation. Erosion control measures considered to minimize effects during construction may include: use of temporary sprinklers in non-active construction areas; stationing water trucks on the site during construction to provide immediate sprinkling in active construction areas; use of temporary silt fencing, sand bags, or screens; thorough watering of graded areas after construction activity has ceased for the day; or sodding or planting of affected areas immediately after site work has been completed.

No significant long-term impacts on soils are anticipated as a result of the project. Areas disturbed during construction will be built-over, paved, or landscaped to minimize erosion and sedimentation.

Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse systems. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basins is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance. As a result of stormwater remaining on-site, HER will be requesting an exemption from requiring a NPDES for Storm Water Associated with Industrial Activities.

3.3 Hydrology

3.3.1 Ground Water

The Island of Oahu is divided into five groundwater sectors consisting of the North Sector, Windward Sector, Honolulu Sector, Pearl Harbor Sector, and the Central Sector. The Sectors are divided into aquifer systems which are areas defined by hydrological continuity, particularly hydraulic connections among units.

The project site is located within the Central Sector. The Wahiawa aquifer system (30501) makes up the Central Sector. Only high level groundwater occurs in this Section. The total sustainable yield of the Wahiawa aquifer is 23 million gallon per day (mgd) (CWRM, August 28, 2008).

The project site is situated above the State Department of Health's Underground Injection Control Line (UIC).

Impacts and Mitigation Measures

No significant impacts to groundwater underlying the project site are anticipated during construction of the proposed facility. Construction activities are not likely to introduce,

nor release from the soil any materials which could adversely affect groundwater, including groundwater sources for domestic use.

Storm runoff from the project site during site preparation will be controlled in compliance with the City and County of Honolulu, *Rules Relating to Storm Drainage Standards* and Department of Health regulations for stormwater. Typical mitigation measures include: appropriately stockpiling materials on-site to prevent runoff; building over, or establishing landscaping as early as possible on disturbed soils to minimize length of exposure.

To minimize potential short-term erosion impacts during construction activities, various erosion control measures are available for implementation. Erosion control measures considered to minimize effects during construction may include: use of temporary sprinklers in non-active construction areas; stationing water trucks on the site during construction to provide immediate sprinkling in active construction areas; use of temporary silt fences, sand bags, or screens; thorough watering of graded areas after construction activity has ceased for the day; or sodding or planting of affected areas immediately after site work has been completed.

Rainfall collected will be directed to a retention basin from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse systems. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basins is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

A well will be drilled and a pump installed for the project. HER received a Well Construction Permit from the Commission on Water Resource Management (CWRM), Department of Land and Natural Resources (DLNR).

The project should not result in substantial increases for potable water demand that may significantly impact ground water resources.

3.3.2 Surface Water

The nearest surface water is Lake Wilson Reservoir, approximately 1 mile to the southeast, as shown in Figure 1-4, which is up gradient of the project site. The natural drainage course for the project site is Kaukonahua Gulch/Stream, which is designated Class 2 Inland, located ½ mile to the south. Poamoho Stream is ¾ miles to the north. There are no wetlands or identified sensitive environments within the immediate vicinity of the project site.

Impacts and Mitigation Measures

No significant impacts to surface waters are anticipated as a result of the project. Storm runoff from the project site during site preparation will be controlled in compliance with the City and County of Honolulu, *Rules Relating to Storm Drainage Standards* and DOH regulations for stormwater. Excavation and grading activities associated with construction of the project will be regulated by the City's grading and ordinance. Typical mitigation measures may include: appropriately stockpiling materials on-site to prevent runoff; building over, or establishing landscaping as early as possible on disturbed soils to minimize length of exposure.

The project will comply with Hawaii Administrative Rules, Chapters 11-54 and 11-55 as applicable to the protection of State waters. The area of soil disturbance within the project site will exceed one acre, therefore, pursuant to HAR Chapter 11-55, a NPDES NOI for Storm Water Associated with Construction Activities will be required from the State DOH. A site-specific BMP Plan will be prepared in conjunction with the NPDES permit application.

Hydrotesting and dewatering is not anticipated at this time. Should discharges from dewatering and hydrotesting be required, a separate NPDES permit will be submitted to State DOH.

The project is not anticipated to increase the discharge of stormwater into State waters. Rainfall collected will be directed to a retention basin from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate of stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

A well will be drilled and a pump installed for the project. HER received a Well Construction Permit from the Commission on Water Resource Management (CWRM), Department of Land and Natural Resources (DLNR).

3.4 Flood Hazard

Based on the Flood Insurance Rate Map ("FIRM"), Community Panel Number 15003C0335 F and 15003C120F (revised September 30, 2004) the project site is located within Zone D: Areas in which flood hazards are undetermined, but possible.

Impacts and Mitigation Measures

No impacts related to flooding are anticipated given the project site's elevation. The project will increase the impervious surface area, which may marginally increase storm

runoff. Proposed drainage improvements, including on site retention basins will be designed to accommodate on-site runoff.

3.5 Flora and Fauna

The area encompassing and surrounding the project site consists of a highly disturbed environment due to long history of agriculture use. A flora and fauna study will be prepared and findings included in the forthcoming Draft EIS.

3.6 Air Quality

The DOH has six monitoring stations throughout the island of Oahu. Each monitoring station typically does not monitor the full complement of air quality parameters. For selected criteria pollutants, the State of Hawaii has established its State ambient air quality standards which are somewhat more stringent than the federal standards under Hawaii Administrative Rules, Title 11, Chapter 59. Hawaii AAQS are more restrictive than federal standards for carbon monoxide (CO), nitrogen oxide (NO₂), and ozone (O₃). In addition, Hawaii regulates emissions of hydrogen sulfide (H₂S), for which there are no federal standards. Hawaii has adopted the NAAQS for particle matter less than 10 micrometers (PM₁₀), sulfur dioxide (SO₂), and lead (Pb). A summary of the federal and Hawaii ambient air quality standards that apply to the project area is presented in Table 3-1.

Air Pollutant	Averaging Time	Hawaii AAQS	Federal (NAAQS)	
			Primary	Secondary
Carbon Monoxide (CO)	1-hour	9 ppm	35 ppm	--
	8-hour	4 ppm	9 ppm	--
Lead (Pb)	Quarterly	1.5 µg/m ³	1.5 µg/m ³	1.5 µg/m ³
Nitrogen Dioxide (NO ₂)	Annual	0.04 ppm	0.05 ppm	0.05 ppm
Ozone (O ₃)	1-hour	--	0.12 ppm	0.12 ppm
	8-hour	0.08 ppm	0.075 ppm	0.075 ppm
Particulate Matter ≤10 micrometers in diameter (PM ₁₀)	Annual	50 µg/m ³	50 µg/m ³	50 µg/m ³
	24-hour	150 µg/m ³	150 µg/m ³	150 µg/m ³
Particulate Matter ≤2.5 micrometers in diameter (PM _{2.5})	Annual	--	15 µg/m ³	15 µg/m ³
	24-hour	--	35 µg/m ³	35 µg/m ³
Hydrogen Sulfide (H ₂ S)	1-hour	0.025 ppm	--	--
Sulfur Oxides (SO ₂)	Annual	0.03 ppm	0.03 ppm	--
	24-hour	0.14 ppm	0.14 ppm	--
	3-hour	0.50 ppm	--	0.50 ppm (1,300 µg/m ³)

Source: State Department of Health, 2008

The closest air monitoring station to the project site is located in Pearl City, atop the Leeward Health Center in a commercial, residential and light industrial area. This

station monitors particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), speciation and air toxics.

Two existing sources in the area are motor vehicle traffic and agricultural field burning. Both sources have typically short-term impacts with former producing elevated carbon monoxide levels during peak traffic hours and the latter producing high particulate matter concentrations during field burning.

According to the State DOH's *2009 Annual Summary Hawai'i Air Quality Data* (September 2010), the state's air quality "continues to be one of the best in the nation, and criteria pollutant levels remain well below state and federal ambient air quality standards." The report contains five-year trends based on annual averages for particulates, sulfur dioxide and nitrogen dioxide, annual averages of daily maximum 1- and 8-hour values recorded for carbon monoxide, and annual averages of daily maximum 8-hour values recorded for ozone concentrations from 2005 to 2009. During this period, the averages were well below both the federal and, the, more stringent, State standards for carbon monoxide and nitrogen dioxide.

An air quality impact study will be prepared and findings included in the forthcoming Draft EIS.

Impacts and Mitigation Measures

The project will have short-term construction-related impacts on air quality, including the generation of dust and emissions from construction vehicles, equipment and commuting construction workers. During construction, activities such as grading and excavation at the project site will generate dust while vehicles and equipment will produce exhaust emissions. Dust control measures stipulated by Department of Health Administrative Rules, Title 11, Chapter 60, "Air Pollution Control" regulations will be employed, as appropriate.

Emissions from construction equipment, trucks and commuting construction workers are short-term and not anticipated to significantly impact ambient air quality. No air pollutants that may be generated at the project site are anticipated to exceed federal or State ambient air quality standards in the vicinity. Slow-moving construction vehicles, however, can disrupt peak hour traffic, increasing congestion and resulting in vehicular emissions. Traffic congestion and resulting emissions will be mitigated by transporting slower construction equipment during off-peak traffic hours.

In the long-term, operation of the proposed facility is not anticipated to have significant impacts. The in-vessel composting system is a system that is effective in odor control. The receiving buildings will be an enclosed facility, where all green wastes, pre-consumer and post-consumer food wastes and dewatered sewage sludge are delivered. The receiving facility will have a biofilter system, an odor removing air filter system, as the primary odor control measure.

The key to odor control is the proper use of the GORE™ Cover and its system for aeration, which optimizes the aerobic decomposition of the feedstock and prevents anaerobic conditions from developing. The windrows are aerated to avoid anaerobic conditions. Aerobic composting does not generate odorous compounds, as do anaerobic processes. The GORE™ Cover System provides multiple functions to include odor reduction, bio-aerosol reduction, and protection from the environment. The GORE™ Cover System functions to prevent 90% of odor molecules from leaving the composting vessel.

In the long-term, dust on access roads and internal roads is mitigated by use of a water truck and/or sprinklers. Loads of finished materials leaving the facility are generally moist. Outgoing loads may be sprayed with water and are required to be covered to minimize dust from trucks.

3.7 Noise

The State Department of Health (Title 11, Chapter 46, Department of Health Administrative Rules) defines three classes of zoning districts and specifies corresponding maximum permissible sound levels due to stationary noise sources such as air-conditioning units, exhaust systems, generators, compressors, pumps, etc., and equipment related to agricultural, construction, and industrial activities. These levels are enforced for any location at or beyond the property line and shall not be exceeded for more than 10 percent of the time during any 20-minute period.

Ambient noise at the project area is generated by vehicular traffic on Wilikina Drive.

A noise impact study will be prepared and findings included in the forthcoming Draft EIS.

Impacts and Mitigation Measures

In the short-term, noise from construction will be unavoidable during the construction period. The various construction phases of the project may generate significant amounts of noise, which may impact adjacent landowners.

Construction noise impacts will be mitigated by compliance with provisions of the State DOH Administrative Rules, Title 11, Chapter 46, "Community Noise Control". State DOH rules limits construction activities to the hours between 7:00 am and 6:00 pm on weekdays, except holidays, and 9:00 am to 6:00 pm on Saturday. Heavy vehicles required for construction must comply with Title 11, Chapter 42 and "Vehicular Noise Control for Oahu". It shall be the contractor's responsibility to minimize noise by properly maintaining noise mufflers and other noise-attenuating equipment, and to maintain noise levels within regulated limits. If noise levels from construction activities are expected to exceed the allowable limits set forth in Chapter 46, a noise permit may be required.

In the long term, ambient noise levels in the immediate vicinity of the project site may marginally increase due to composting operations and the amount of trucks entering and exiting the site. The green and food wastes are loaded into a grinder that shreds the waste into mulch. The grinder is located in the enclosed receiving building to minimize noise impacts. The dewatered sewage sludge will be loaded with green waste into a mixer that is located within the enclosed receiving building. Noise impacts due to operations will comply with DOH noise standards.

3.8 Archaeological and Cultural Resources

The project site has been highly disturbed due to years of agricultural use. An archaeological and cultural assessment will be conducted and the results included in the forthcoming Draft EIS.

3.9 Traffic

The project site is bordered by Wilikina Drive to the north. Wilikina Drive is a two-lane, two-way roadway, with a posted speed limit of 45 mph. A traffic impact assessment will be prepared and the results included in the forthcoming Draft EIS.

3.10 Socio-Economic Characteristics

Population and Housing: The project falls within the North Shore Neighborhood Area. According to the Department of Planning Permitting (2000), the North Shore Neighborhood Area had a population of 18,380 in comparison to the overall population of Oahu of 876,156. Relative to Oahu as a whole, the North Shore Neighborhood Area population by age is about the same; has a racial mix with slightly more Whites and less Asian; slightly more number of family households; slightly lower homeownership rates; and, higher vacancy rates (See Table 3-2).

Economy: The project is within the Census tract 99.01 (Waialua-Mokuleia). According to the U.S. 2000 Census data, the 1999 median household income for Waialua-Mokuleia CT was \$47,423, which is lower than the median household income of \$51,914 for Honolulu (U.S. Census, 2000).

Impacts and Mitigation Measures

Population and Housing: No significant impacts to population or housing in the vicinity of the project site are anticipated as a result of the construction and operation of the project. The proposed facility is not expected to change the existing resident population in the community. No new residential units and no in-migration of resident are anticipated as a result of the proposed facility.

Economy: No significant impact to the economy within the vicinity of the project site are anticipated as a result of the construction and operation of the proposed facility. In the short-term, the project will confer some positive benefits to the local economy. Direct economic benefits will result from construction expenditures both through the purchase of materials from local suppliers and through the employment of local labor, thereby

stimulating that sector of the economy. During construction, retail businesses in the vicinity of the project site may benefit from the increased presence of workers.

Subject	Neighborhood Area 27: North Shore		O'ahu	
	Number	Percent	Number	Percent
Total population	18,380	100.0	876,156	100.0
AGE				
Under 5 Years	1,511	8.2	56,849	6.5
5 – 19 years	3,695	20.1	175,175	20.0
20 – 64 years	11,300	61.5	526,395	60.1
65 years and over	2,067	11.2	130,496	15.9
Median age (years)	31.3	--	35.7	--
RACE (alone or in combination with other races)				
White	9,874	53.7	308,838	35.2
Black or African American	864	4.7	29,764	3.4
American Indian and Alaska Native	500	2.7	15,921	1.8
Asian	8,358	45.6	539,384	61.6
Native Hawaiian and other Pacific Islander	9,808	20.7	189,292	21.6
Other	1,194	6.5	32,003	3.7
HOUSEHOLD (BY TYPE)				
Total Households	5,983	100.0	286,450	100.0
Family households (families)	4,361	74.0	205,672	71.8
With own children under 18 years	2,102	35.7	91,022	31.8
Married-couple family	3,314	56.2	156,195	54.5
With own children under 18 years	1,602	27.2	70,442	24.6
Female householder, no husband present	682	11.6	35,138	12.3
With own children under 18 years	337	5.7	15,235	5.3
Non – families	1,532	26.0	80,778	28.2
Living alone	1,023	17.4	61,963	7.1
65 years and over	275	4.7	20,021	7.0
Average persons per household	3.05	--	2.95	--
HOUSING OCCUPANCY AND TENURE				
Total Housing Units	6,648	100.0	315,988	100.0
Occupied units	5,893	88.6	286,450	90.7
By owner	2,595	39.0	156,290	49.5
By renter	3,298	49.6	130,160	41.2
Vacant units	755	11.4	29,538	9.3

Source: City & County of Honolulu, Department of Planning & Permitting, 2000

3.11 Public Services

Police: Police protection is provided by the City and County of Honolulu, through the Wahiawa Police Station, located at 330 North Cane Street, approximately two and half miles southeast from the project site.

Fire: Fire protection is provided by the City and County of Honolulu. The nearest station is the Wahiawa Fire Station, located at 640 California Avenue, immediately approximately two and half miles from the project site.

Medical: Wahiawa General Hospital is located in Wahiawa Town, approximately two and half miles southeast from project site.

Impacts and Mitigation Measures

In the short-term, construction activities at the project site may increase potential demand for police services due to construction-related traffic, security of the construction site and the presence of more people associated with construction. The potential need for fire protection services would increase due to the presence of construction materials and equipment on the project site. The presence of construction workers and others at the project site would also increase the potential demand for emergency care services. These impacts, however, would be relatively insignificant within the overall context of the areas served by the respective public services.

The construction of the project may increase construction job opportunities for North Shore residents.

In the long - term, operation of the proposed facility will have negligible community impact on police, fire, and emergency services.

3.12 Infrastructure

Water: The project site is not serviced by the City & County of Honolulu's water system.

Wastewater: The project site is not serviced by the City & County of Honolulu's wastewater system.

Electrical and Communication: Hawaiian Electric Company (HECO) provides electrical services in the project area through overhead power lines. Hawaiian Telcom provides telephone and communication services.

Impacts and Mitigation Measures

Water: No significant impacts on the municipal water system are anticipated during construction and operation of the project.

The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be collected and processed and will not be discharged to the

stormwater collection system. Stormwater is handled in a separate collection system and directed to retention basins on the project site, from which water will be drawn to assist the maintenance of proper moisture content of the composting material. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

A well will be drilled, a pump and water distribution system will be installed for the project. HER received a Well Construction Permit from the Commission on Water Resource Management (CWRM), Department of Land and Natural Resources (DLNR).

Wastewater: No significant impacts on the municipal wastewater system are anticipated during construction of the project. A septic system with leachfield is proposed to accommodate wastewater. The DOH Wastewater Branch was consulted with.

Electrical: No significant impacts on the electrical system are anticipated during construction of the project. Additional energy requirements associated with the project will be accommodated via the existing distribution power lines.

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4.0 RELATIONSHIP TO LAND USE, POLICIES AND CONTROLS

The plans and policies relating to the proposed project range from broad program guidance to land use controls governing the project site. Construction of the proposed project is in consonance with the various plans, policies, and regulatory controls, as discussed below.

4.1 State of Hawaii

4.1.1 Hawaii State Plan

The Hawaii State Plan (Chapter 226, Hawaii Revised Statutes, as amended) provides the overall theme, goals, objectives, policies and priority guidelines for statewide planning. The Hawaii State Plan also directs the appropriate State agencies to prepare functional plans for their respective program areas. The proposed project supports and is consistent with the following State Plan objectives:

§226-15 Objectives and policies for facility systems – solid and liquid wastes:

(b)(2) Promote re-use and recycling to reduce solid and liquid wastes and employ a conservation ethic.

(b)(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.

Comment: The project will provide the City, homeowners, and commercial businesses a place to recycle green waste; commercial businesses to recycle food waste and the City to dispose of dewatered sewage sludge. HEP currently recycles over 85,000 tons of green and food waste per year from Campbell Industrial Park and Kapaa Quarry. By recycling and reusing organic materials, this waste which once was disposed of in Oahu's only landfill is being turned into beneficial products, such as soil enrichment, fertilizer replacement/enhancement, gardening and landscaping products. The proposed facility is anticipated to process up to 150,000 tons per year.

§226-16 Objective and policies for facility systems – water.

(b)(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.

Comment: Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

4.1.2 State Land Use District

The State Land Use Law is intended to preserve, protect, and encourage the development of lands in the State for uses which are best suited to the public health and welfare of Hawaii's people. The Hawaii Land Use Law in Chapter 205, Hawaii Revised Statutes (HRS), classifies all land in the State into four land use districts: Urban, Agricultural, Conservation, and Rural. The project site lies within the Agricultural District, which includes "*lands for the cultivation of crops, aquaculture raising livestock, wind energy facility, timber cultivation, agriculture-supported activities (i.e., mills, employee quarters, etc.) and land with significant potential for agricultural uses. Uses permitted in the highest productivity agricultural categories are governed by statute. Uses in the lower productivity categories - C, D, E or U – are established by the Commission and include those allowed on A or B lands as well as those stated under Section 205-4.5 HRS.*" (see Figure 4-1). The project site has a productivity rating of B and C, as shown in Figure 3-2.

According to §205-4.5, HRS, the project is a permissible use within the Agricultural District.

4.2 City and County of Honolulu

4.2.1 General Plan

The General Plan for the City and County of Honolulu is a statement of the long-range social, economic, environmental, and design objectives for the general welfare and prosperity of the people of Oahu. The Plan is also a statement of broad policies that facilitate the attainment of the objectives of the Plan. Eleven subject areas provide the framework for the City's expression of public policy concerning the needs of the people and functions of government. These areas include population; economic activity; the natural environment; housing; transportation and utilities; energy; physical development and urban design; public safety; health and education; culture and recreation; and government operations and fiscal management.

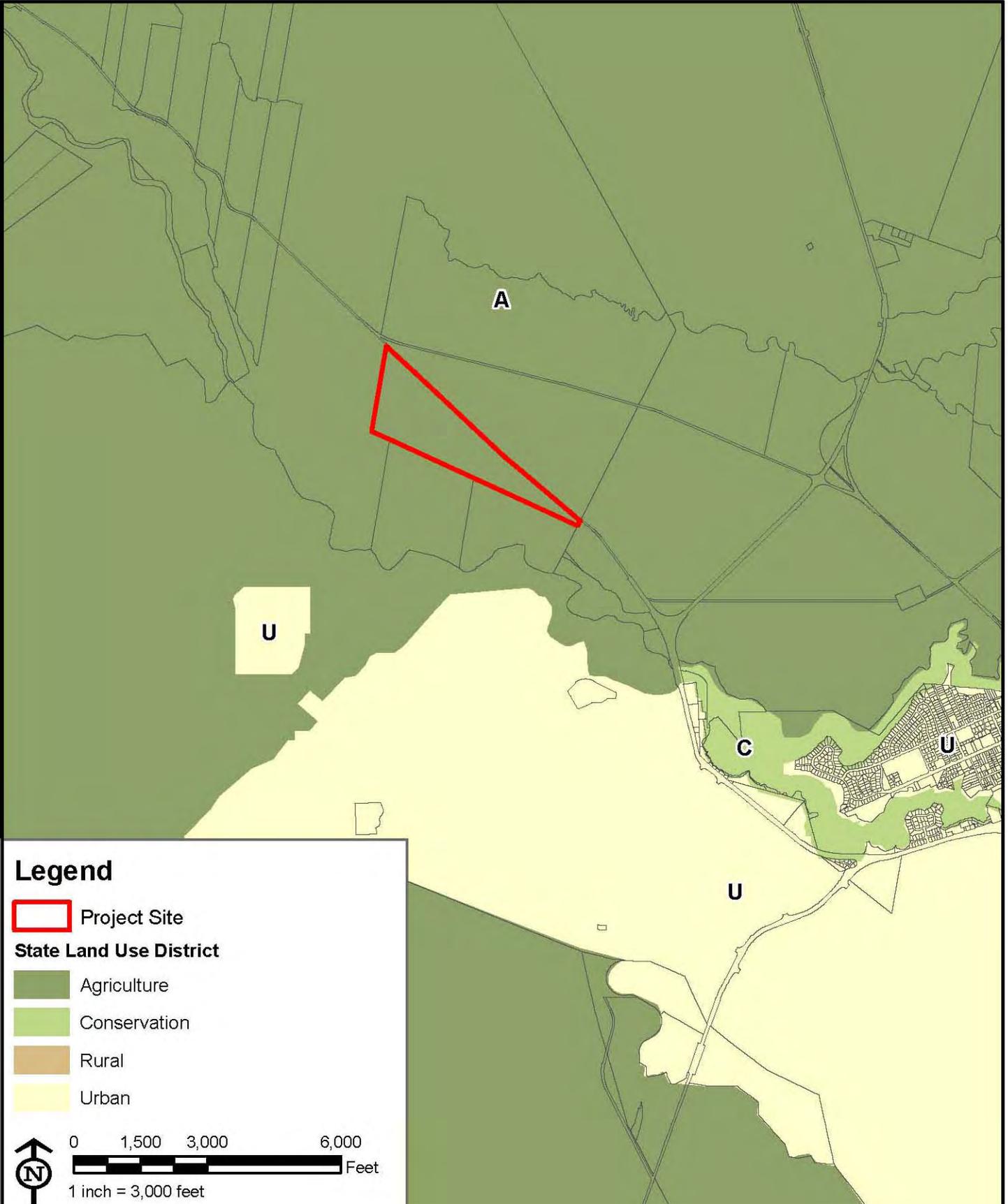
As presented in Chapters 2 and assessed in Chapter 3 of this environmental assessment, the proposed action is in consonance with the following objectives and policies of the General Plan:

II. Economic Activity

Objective C: To maintain the viability of agriculture on Oahu.

Policy 1: Assist the agricultural industry to ensure the continuation of agriculture as an important source of income and employment.

Policy 2: Support agricultural diversification in all agricultural areas on Oahu.



Legend

 Project Site

State Land Use District

-  Agriculture
-  Conservation
-  Rural
-  Urban

 0 1,500 3,000 6,000 Feet
1 inch = 3,000 feet

 WILSON OKAMOTO CORPORATION ENGINEERS • PLANNERS	IN-VESSEL COMPOSTING FACILITY	FIGURE 4-1
	STATE LAND USE DISTRICT (SLUD) MAP	

Policy 3: Support the development of markets for local products, particularly those with the potential for economic growth.

Policy 7: Encourage the use of more efficient production practices by agriculture, including the efficient use of water.

Policy 8: Encourage the more efficient use of non-potable water for agricultural use.

Comment: The project will benefit the City and State by recycling green and food waste and dewatered sewage sludge. HEP currently recycles over 85,000 tons of green and food waste per year from Campbell Industrial Park and Kapaa Quarry. By recycling and reusing organic materials, this waste which once was disposed of in Oahu's only landfill is being turned into beneficial products, such as soil enrichment, fertilizer replacement/enhancement, gardening and landscaping products.

The proposed site in Waiialua is an ideal location for HER's composting operations as it will be centrally located to Oahu's agricultural industry. HER produces organic products that would be utilized by the agricultural industry to introduce organic materials into soils that have been stripped of nutrients from decades of sugar cane and pineapple cultivation and the use of chemical fertilizers. The agricultural industry would have much more access to these organic soil amendments with the project's location.

Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

V. Transportation and Utilities

Objective B: To meet the needs of the people of Oahu for an adequate supply of water and for environmentally sound systems of waste disposal.

Policy 2: Develop and maintain an adequate supply of water for agricultural and industrial needs.

Policy 3: Encourage the development of new technology which will reduce the cost of providing water and the cost of waste of disposal.

Policy 5: Provide safe, efficient, and environmentally sensitive waste-collection and waste disposal services.

Policy 6: Support programs to recover resources from solid-waste and recycle wastewater.

Comment: The project will benefit the City and State by recycling green and food waste and dewatered sewage sludge. HEP currently recycles over 85,000 tons of green and food waste per year from Campbell Industrial Park and Kapaa Quarry. By recycling and reusing organic materials, this waste which once was disposed of in Oahu's only landfill is being turned into beneficial products, such as soil enrichment, fertilizer replacement/enhancement, gardening and landscaping products.

Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. The stormwater used will decrease the amount of potable water needed to operate the composting facility. Supplemental water from the well will be required to make up the balance.

4.2.2 Development and Sustainable Communities Plan

The City and County of Honolulu's Development/Sustainable Communities Plan program provides a framework for implementing the objectives and policies of the General Plan on an area wide basis. Eight community-oriented plans have been adopted covering the entire island. Each of the plans is intended to help guide public policy, investment, and decision making within their representative region.

4.2.2.1 North Shore Sustainable Communities Plan

The project site is located within the North Shore Sustainable Communities Plan, which extends from Kaena Point to Waialeale Gulch near Kawela Bay, and from the shoreline slopes of the northerly ends of Waianae Koolauloa mountain ranges. The region consists mostly of agricultural lands and open space, which surround the country towns of Haleiwa and Waialua and the rural residential communities of Mokuieia, Kawaihoa, and Sunset/Pupukea.

The *Draft North Shore Sustainable Communities Plan (SCP)* (August 2010) focuses on retaining the unique qualities that have defined the North Shore's attractiveness to residents and visitors alike; scenic open spaces, coastal resources, and the community's cultural and plantation heritage. Diversified agriculture also plays a role in sustaining the region's open space setting. The *North Shore SCP* provides a vision in the areas of land use, transportation, infrastructure, and public facilities. It also

provides policies and guidelines for achieving that vision. The project is consistent with the following guidelines, policies and principles contained in the PUC Development Plan:

3.2 Agriculture

3.2.1 Policies

- *Protect all productive, high-value agricultural lands, regardless of current crop production capabilities, from uses that would undermine or otherwise irreversibly compromise their agricultural potential and crop production capabilities.*
- *Promote the long-term viability of diversified agriculture on the North Shore and ensure the continued productive use of the land.*
- *Maintain a healthy and competitive industry that support a range of different types and scales of agriculture.*
- *Ensure that agriculture is the primary use of agricultural lands. Prohibit the improper use of agricultural lands, including the development or subdivision of agriculturally designated zoned lands for residential and other non-agricultural uses, unless accessory to agricultural use.*
- *Maintain the current agricultural land use and zoning designation of agricultural lands within the Community Growth Boundary that are in the State Agricultural District and zoned for agriculture, except for limited “infill” areas contiguous to Haleiwa and Waialua towns that are designated for future residential.*
- *Minimize soil erosion, pesticide and fertilizer runoff, and other nonpoint source contaminants that flow from agricultural lands to protect streams, wetlands and marine habitats.*
- *Maintain and upgrade the existing agricultural infrastructure.*
- *Encourage the development of regional agricultural support facilities at Waialua and Kawaihoa through the use of economic tax incentives.*
- *Develop and enforce stringent set of criteria that define the minimum requirements for the meaningful and credible use of agricultural land.*
- *Encourage landowners to provide affordable long-term leases to farmers.*
- *Promote the development and provision of quality water resources that support bonafide agricultural operations and activities by providing economic incentives for farmers and landowners.*
- *Consider alternatives to the current tax rate structure to afford tax relief for farmers.*
- *Plan for the future of Oahu’s agricultural industry and develop and island wide comprehensive agricultural development plan.*

Comment: Approximately 60 percent of the 77,000 total acres of land within the North Shore SCP region are located within the State Agricultural District (City & County of Honolulu, August 2010). The project site (113 acres) is rated “B and “C” and located

outside of the North Shore SCP's Community Growth Boundary. The project site has been fallow since late 2004. HEP currently has existing open windrow composting operations (DOH Permit No. CO-0091-08) at the project site.

The proposed site in Waialua is an ideal location for HER's composting operations as it will be centrally located to Oahu's agricultural industry. HER produces organic products that would be utilized by the agricultural industry to introduce organic materials into soils that have been stripped of nutrients from decades of sugar cane and pineapple cultivation and the use of chemical fertilizers. The agricultural industry would have much more access to these organic soil amendments with the project's location.

Rainfall collected will be directed to a retention basin from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance. A well will be drilled and a pump installed.

The project should not result in substantial increases for potable water demand that may significantly impact ground water resources nor have any impacts on the surrounding environment.

The proposed land use is regulated as "major composting". Pursuant to Land Use Ordinance, Section 21-3.504(a), Table 21-3, a major composting facility is permitted in the AG-1 District subject to an approved Conditional Use Permit (major).

4.5 Solid Waste Handling and Disposal

4.5.1 Policies

- *Provide adequate resources for trash removal, cleanup of illegal dumps, and enforcement of antidumping laws.*
- *Promote recycling and other source reduction programs dedicated to minimizing the amount of solid waste generated.*

Comment: The proposed facility will provide the City, homeowners, and commercial businesses a place to recycle green and food waste and dewatered sewage sludge. HEP currently recycles over 85,000 tons of green and food waste per year from Campbell Industrial Park and Kapaa Quarry. By recycling and reusing organic materials, this waste which once was disposed of in Oahu's only landfill is being turned into beneficial products, such as soil enrichment, fertilizer replacement/enhancement,

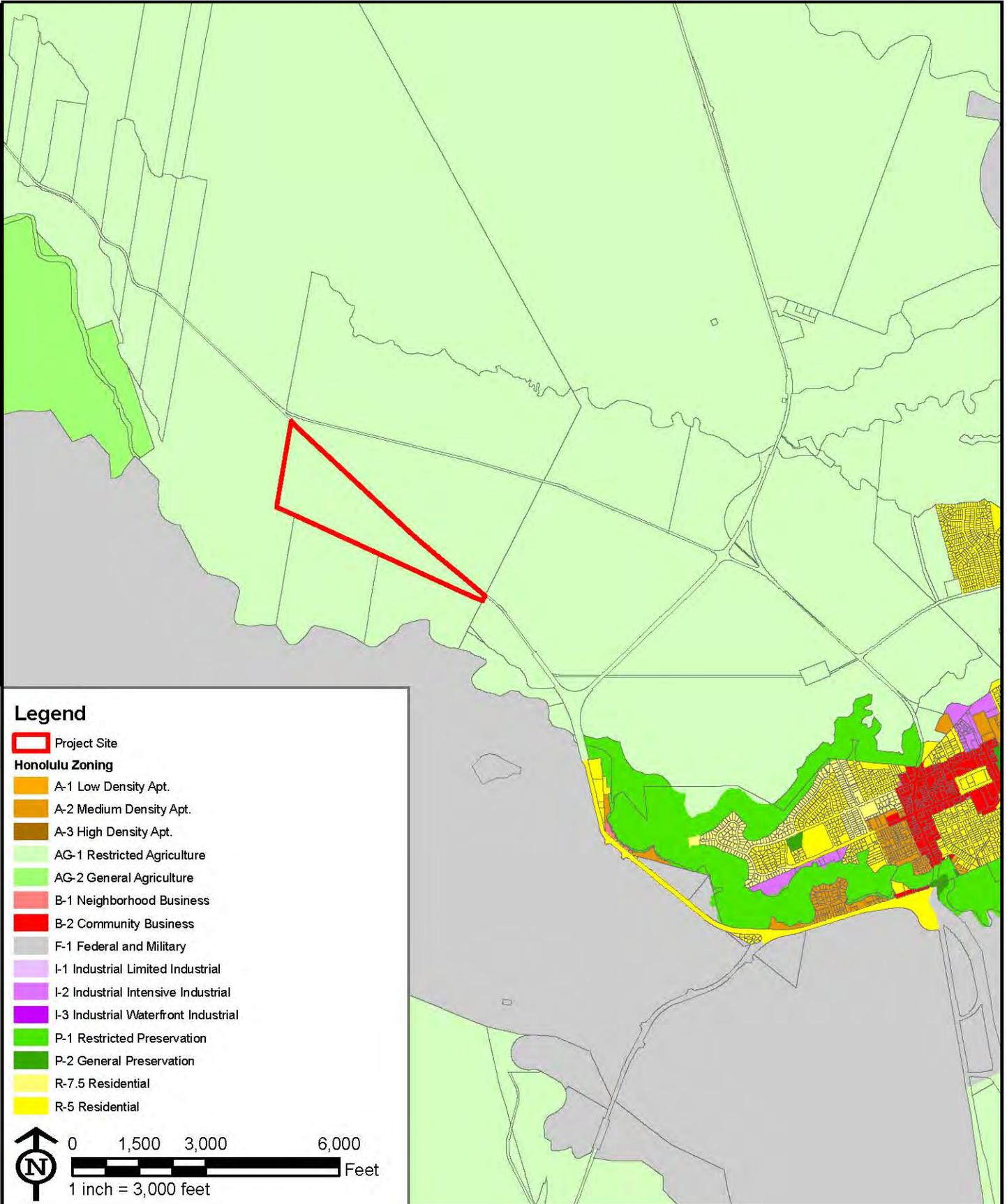
gardening and landscaping products. The proposed facility anticipates on handling up to 150,000 tons per year.

4.2.3 Land Use Ordinance and Zoning

The City and County of Honolulu Land Use Ordinance (LUO) regulates land use in accordance with adopted land use policies, including the General Plan and DPs. The provisions are also referred to as the zoning ordinance. The project site is zoned AG-1 Restricted Agricultural District (see Figure 4-2). The proposed land use is regulated as “major composting”. Pursuant to Land Use Ordinance, Section 21-3.504(a), Table 21-3, a major composting facility is permitted in the AG-1 District subject to an approved Conditional Use Permit (major).

4.2.4 Special Management Area

Coastal Zone Management objectives and policies (Section 205A-2, HRS) and the Special Management Area (SMA) guidelines (Section 25-3.2 ROH) have been developed to preserve, protect, and where possible, to restore the natural resources of the coastal zone of Hawaii. The project is outside of the SMA.



 <p>WILSON OKAMOTO CORPORATION ENGINEERS • PLANNERS</p>	<p style="text-align: center;">IN-VESSEL COMPOSTING FACILITY</p> <hr/> <p style="text-align: center;">CITY AND COUNTY OF HONOLULU ZONING MAP</p>	<p style="text-align: center;">FIGURE 4-2</p>
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5.0 CHAPTER 200, TITLE 11, SIGNIFICANCE CRITERIA

The proposed project is not subject to the environmental documentation requirements prescribed under Chapter 343, Environmental Impact Statements, Hawaii Revised Statutes (as amended) and Hawaii Administrative Rules Chapter 200 (Environmental Impact Statement Rules) Title 11, of the State of Hawaii Department of Health as amended (State of Hawaii 1996). Nevertheless, as a part of the contractual requirements between the City and County of Honolulu Department of Environmental Services (ENV) and Hawaiian Earth Recycling LLC (HER), these environmental documentation requirements will be followed for this project.

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

The project will not involve the loss or destruction of any natural or cultural resource. The area encompassing and surrounding the project site is extensively used for agricultural purposes over the past 100 years.

A Flora/Fauna Study, Archaeological Assessment and Cultural Impact Assessment will be prepared for the project and findings included in the forthcoming Draft EIS.

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

The project will not curtail the beneficial uses of the environment. The project site has been highly disturbed due to years of agricultural use. The proposed facility will provide the City, homeowners, and commercial businesses a place to recycle green and food waste and dewatered sewage sludge. HEP currently recycles over 85,000 tons of green and food waste per year from Campbell Industrial Park and Kapaa Quarry. By recycling and reusing organic materials, this waste which once was disposed of in Oahu's only landfill is being turned into beneficial products, such as soil enrichment, fertilizer replacement/enhancement, gardening and landscaping products. The proposed facility anticipates on handling up to 150,000 tons per year.

The project should not result in substantial increases for potable water demand that may significantly impact ground water resources nor have any impacts on the surrounding environment.

Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the

amount stored. Supplemental water from the well will be required to make up the balance.

(3) Conflict with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 343, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;

The project will not conflict with the State's long-term environmental policies, goals and/or guidelines. The project is promoting reuse and recycling of green and food wastes and dewatered sewage sludge to reduce solid and liquid wastes. The proposed facility will provide the City, homeowners, and commercial businesses a place to recycle green and food waste and dewatered sewage sludge. HEP currently recycles over 85,000 tons of green and food waste per year from Campbell Industrial Park and Kapaa Quarry. By recycling and reusing organic materials, this waste which once was disposed of in Oahu's only landfill is being turned into beneficial products, such as soil enrichment, fertilizer replacement/enhancement, gardening and landscaping products. The proposed facility anticipates on handling up to 150,000 tons per year.

As presented in this EISPN, the project's potential temporary adverse impacts are associated with short-term construction-related activities and can be mitigated through adherence to standard construction mitigation practices.

(4) Substantially affect the economic or social welfare of the community or state;

The project will not adversely impact the economic or social welfare of the community. The project would provide short-term economic benefits in the form of construction jobs. In the long-term, the project is not anticipated to change the existing resident population in the community.

(5) Substantially affect public health;

The project will not adversely impact public health. Short-term impacts are related to construction-related activities such as air and noise.

The odor management system would be a combination of all facility's operating components to mitigate odor issues while being able to meet and/or exceed odor requirements at the property line.

A noise impact and air quality study will be prepared and findings included in the forthcoming Draft EIS.

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

The project would not generate any new in-migrant residents to the island of Oahu or to the region due to additional permanent jobs since none are expected.

(7) Involve a substantial degradation of environmental quality;

The project is not anticipated to have a negative impact upon the environment. Construction activities associated with the project are anticipated to result in short-term impacts to noise, air quality, water quality and traffic in the immediate vicinity. With the incorporation of mitigation measures during the construction period, the project will not result in long-term degradation to the environmental quality.

In the long-term, the recycling of compostable materials (green and food waste and dewatered sewage sludge) will decrease the amount of material being disposed at Oahu's only landfill.

Rainfall collected will be directed to a retention basin from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

(8) Individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;

The project will not create a commitment for any larger actions, nor will it contribute to cumulative negative effect upon the environment. The project involves the redevelopment of an agricultural processing facility on a site already developed and consistent with land use plans and designations.

(9) Substantially affect a rare, threatened or endangered species, or its habitat;

The project is not anticipated to impact rare, threatened or endangered species, or its habitat. The project site and surrounding areas has been heavily used for agricultural practices. A flora and faunal study will be prepared and findings included in the forthcoming Draft EIS.

(10) Detrimentially affect air or water quality or ambient noise levels;

The project is not anticipated to impact air or water quality or ambient noise levels. Operation of construction equipment may temporarily elevate ambient noise and concentrations of exhaust emission in the immediate vicinity of the project site. In the

long-term the facility will be operating air blowers and grinding machines. Noise impact and air quality studies will be prepared and findings included in forthcoming Draft EIS.

Rainfall collected will be directed to a retention basin from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse system. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basin is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance.

(11) Affect or is likely to suffer damage by being located in an environmentally - sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

The project site is located within Zone "D", areas in which flood hazards are undetermined. Given the sites elevation and gentle slopes, no significant impacts to flood hazards are anticipated as a result of the project.

(12) Substantially affect scenic vistas and viewplanes identified in county or state plans or studies; or

The project is not anticipated to substantially affect scenic vistas and viewplanes.

(13) Require substantial energy consumption.

Construction and operation of the project will not require substantial energy consumption.

6.0 LIST OF PERMIT APPROVALS

The following is a list of permits, approvals and reviews, which may be required, but not limited to, prior to construction of the project:

State of Hawaii

Department of Health:

- National Pollutant Discharge Elimination System (NPDES) for Storm Water Associated with Construction Activity
- Solid Waste Management Permit
- Temporary Non-Covered Source Permit
- Air Pollution Control Permit

Department of Land and Natural Resources:

- Well Construction Permit

Department of Transportation:

- Permit for Transportation of Oversized and Overweight Equipment Loads

City & County of Honolulu

- Conditional Use Permit (Major)
- Building Permit
- Grading, Grubbing and Stockpiling Permit

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7.0 CONSULTATION

7.1 Pre-Assessment Consultation

The following agencies and organizations were contacted during the pre-assessment consultation period. Of those who formally replied, some had no comments while others provided substantive comments as indicated by the ✓ and ✓✓, respectively. All written comments are reproduced herein (Appendix A).

Federal

U.S. Fish & Wildlife Service
Department of the Army, Schofield Barracks ✓✓

State

Department of Agriculture
Department of Accounting & General Services ✓
Department of Business, Economic Development & Tourism (DBEDT)
DBEDT, Office of Planning
DBEDT, Energy Division
Department of Health (DOH), Clean Water Branch ✓✓
DOH, Clean Air Branch ✓✓
Department of Land & Natural Resources (DLNR)
 Engineering Division ✓
 Division of Forestry and Wildlife ✓
DLNR, State Historic Preservation Division ✓✓
Office of Hawaiian Affairs ✓
Department of Transportation ✓
Department of Hawaiian Home Lands

City & County of Honolulu

Board of Water Supply ✓✓
Department of Planning & Permitting ✓✓
Department of Transportation Services ✓
North Shore Neighborhood Board
Wahiawa – Whitmore Village Neighborhood Board

Elected Officials

Representative Marcus Oshiro, District 39
Representative Gil Riviere, District 46
Senator Donavon Dela Cruz, District 22
Councilmember Ernie Martin, District 2

Other

Castle & Cooke

7.2 Parties to be Consulted During the EISPN

The following agencies and organizations will be consulted and comments solicited for the EISPN.

Federal

U.S. Army Corps of Engineers
U.S. Fish & Wildlife Service
Schofield Barracks

State

Department of Agriculture
Department of Business, Economic Development & Tourism (DBEDT)
DBEDT, Office of Planning
DBEDT, Energy Division
Department of Health
Department of Land & Natural Resources (DLNR)
DLNR, State Historic Preservation Division
Office of Hawaiian Affairs
Department of Transportation
Department of Hawaiian Home Lands

City & County of Honolulu

Board of Water Supply
Department of Facility Maintenance
Department of Parks and Recreation
Department of Planning and Permitting
Department of Transportation Services
North Shore Neighborhood Board
Wahiawa – Whitmore Village Neighborhood Board

Elected Officials

Representative Marcus Oshiro, District 39
Representative Gil Riviere, District 46
Senator Donavon Dela Cruz, District 22
Councilmember Ernie Martin, District 2

Other

Castle & Cooke

8.0 REFERENCES

1. City and County of Honolulu, Department of Planning and Permitting. *General Plan Objectives and Policies*. 1992.
2. City and County of Honolulu, Department of Planning and Permitting. *Draft North Shore Sustainable Communities Plan*. August 2010.
3. City & County of Honolulu, Department of Planning and Permitting. General Demographic Characteristics for Neighborhood Area North Shore.
4. George A.L. Yuen & Associates. *State Water Resources Protection Plan*. State of Hawaii, Review Draft March 1992.
5. State of Hawaii Commission on Water Resource Management. Ground Water Hydrologic Unit Map, Island of Oahu Map, August 28, 2008
6. Hawaii State Department of Business, Economic Development and Tourism. *Hawaii Census 2000*.
7. Hawaii State Department of Health. *Annual Summary of Hawaii Air Quality Data*. 2009. September 2010.
8. Macdonald, Gordon A., A.T. Abbott and Frank L. Peterson. *Volcanoes in the Sea, The Geology of Hawaii*. Second Edition 1986.
9. United States Department of Agriculture Soil Conservation Service. *Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii*, August 1972.
10. University of Hawaii, Department of Geography. *Atlas of Hawaii*. The University Press of Hawaii, Honolulu, Third Edition 1998.

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Appendix A

Pre-Assessment Consultation Letters



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND, PACIFIC REGION
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
851 WRIGHT AVENUE, WHEELER ARMY AIRFIELD
SCHOFIELD BARRACKS, HAWAII 96857-5000

EM

JAN 11 2011

Office of the Garrison Commander

RECEIVED
JAN 14 2011
WILSON OKAMOTO CORPORATION

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Attention: Mr. Earl Matsukawa, Project Manager

Dear Mr. Matsukawa,

Thank you for the opportunity to review the project summary and exhibits sent in the December 03, 2010 solicitation for comments titled "Environmental Assessment (EA) / Environmental Impact Statement Preparation Notice (EISPN), Pre-Assessment Consultation, In-Vessel Composting Facility Project, Tax Map Key: 6-5-002:026, Wailua, Oahu, Hawaii".

In response I request the following items be addressed in preparation of any environmental assessment documentation. Please consider:

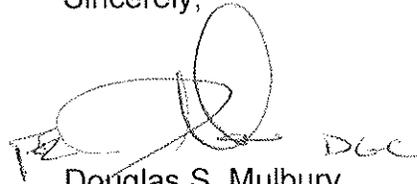
a. Traffic Impacts to Central Oahu and the areas immediate to Schofield Barracks including peak times and months. Note that approximately 5,000 Soldiers (that live both on and off post) from the 2nd Stryker Brigade, as well as 300 Soldiers from the 307th Signal Battalion at Helemano Military Reservation, are currently deployed. Traffic data, if collected in the immediate future, may be skewed due to this fact. Please consider this point when calculating and determining potential traffic impacts.

b. Air Quality (odor and particulate matter). Schofield Barracks may potentially be impacted due to the close proximity of the proposed project site to Schofield Barracks. Please generate and display radial odor contours and compare to industry standard guidance/values for incorporation into documentation meant for review. Indicate odor values for both GoreTM covered and uncovered compost as well as anticipated length of time material will be uncovered. Additionally, please indicate whether particulate emissions are anticipated and if so what would the region of influence be as well as what impacts are anticipated.

c. Noise from both traffic and facility operations are likely to occur. Please examine the potential impacts to the surrounding areas and display radial noise contours and compare to industry standard guidance/values for incorporation into documentation meant for review.

I request the opportunity and look forward to review any draft environmental documentation prepared concerning this innovative composting facility. If you should have any questions please contact William Rogers at 656-1530.

Sincerely,

A handwritten signature in black ink, appearing to read 'D.S. Mulbury', with a large, stylized loop at the end. The signature is written over a faint, illegible stamp or background.

Douglas S. Mulbury
Colonel, US Army
Commanding



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8135-01
February 23, 2011

Colonel Douglas S. Mulbury
Department of the Army
US Army Installation Management Command, Pacific Region
Headquarters, United States Army Garrison, Hawaii
851 Wright Avenue, Wheeler Army Airfield
Schofield Barracks, HI 96857

Attention: Mr. William Rogers

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Colonel Mulbury:

Thank you for your letter dated January 11, 2011. We offer the following responses in respective order of your comments:

1. A Traffic Impact Assessment will be prepared and findings included in the forthcoming Draft Environmental Impact Statement (EIS). We appreciate the information on the status of troop deployment. The information will be forwarded to the traffic engineers for consideration.
2. The in-vessel composting system is a system that is effective in odor control. The receiving building will be an enclosed/covered facility, where all pre-consumer and post-consumer food wastes, green waste and dewatered sewage sludge are delivered. The receiving facility will have a biofilter system, an odor removing air filter system, as the primary odor control measure.

Short-term and long-term impacts will be discussed in the forthcoming Draft EIS. Noise and air quality impacts will comply with State Department of Health Administrative Rules.

3. A copy of the forthcoming EISPN and subsequent Draft EIS will be sent to you for your review and comment.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services

NEIL AMBERCROMBIE
GOVERNOR



BRUCE A. COPPA
COMPTROLLER

RYAN T. OKAHARA
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)1302.0

JAN - 4 2011

Mr. Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawai'i 96826

RECEIVED
JAN 05 2011

EM TR

WILSON OKAMOTO CORPORATION

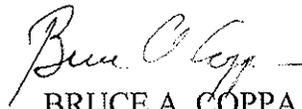
Dear Mr. Matsukawa:

Subject: Environmental Assessment/Environmental Impact Statement
Preparation Notice Pre-Assessment Consultation
In-Vessel Composting Facility Project
Wailua, Oahu, Hawai'i
TMK: (1) 6-5-002: 026

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

If you have any questions please have your staff call Ms. Gayle Takasaki of the Public Works Division at 586-0584.

Sincerely,


BRUCE A. COPPA
State Comptroller

GT:lnn



8135-01
February 23, 2010

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Bruce A. Coppa, Comptroller
Department of Accounting & General Services
Kalanimoku Building
P.O. Box 119
Honolulu, HI 96810

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Coppa:

Thank you for your letter dated January 4, 2011 (Ref. No. (P)1302.0). We acknowledge that you have no comments to offer at this time and the proposed project does not impact any of the Department's projects or existing facilities.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services



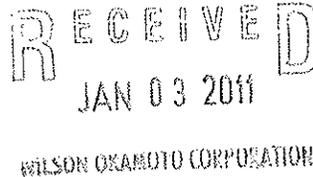
STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
EMD/CWB

12071PDCL.10

December 29, 2010

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii 96826



EM

Dear Mr. Matsukawa:

SUBJECT: Comments on Environmental Assessment/Environmental Impact Statement Preparation Notice (EA/EISPN) Pre-Assessment Consultation for the In-Vessel Composting Facility Project Wailua, Island of Oahu, Hawaii

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated December 3, 2010, requesting comments on the subject project. We have reviewed your letter and offer these comments on your project. Please note that our review is based solely on the information provided in your letter and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at <http://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

- a. Storm water associated with construction activities, including clearing, grading, excavation, demolition, stockpiling, and staging that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities.
- b. Storm water associated with industrial activities, as categorized in Title 40 of the Code of Federal Regulations (CFR), Sections 122.26(b)(14)(i) through 122.26(b)(14)(ix) and 122.26(b)(14)(xi).
- c. Hydrotesting waters.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html>.

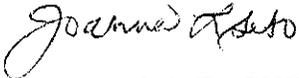
3. For types of wastewater not listed in Item 2 above or wastewater discharging into Class 1 or Class AA waters, you may need an NPDES individual permit. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/indiv-index.html>.
4. It is recommended that an assessment be performed on the project's construction and operation related impacts to all State surface waters (including Kaukonahua Stream and any wetlands) in the vicinity of the project site.
5. Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); 40 CFR, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.
6. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Mr. Earl Matsukawa, AICP
December 29, 2010
Page 3

12071PDCL.10

If you have any questions, please visit our website at
<http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the
Engineering Section, CWB, at 586-4309.

Sincerely,



ALEC WONG, P.E., CHIEF
Clean Water Branch

DCL:ml

c: DOH-EPO # I-3477 [via email only]



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8135-01
February 23, 2010

Mr. Alec Wong, P.E., Chief
Clean Water Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Wong:

Thank you for your letter dated December 29, 2010 (Reference No. EMD/CWB 12071PDCL.10). We offer the following comments in the respective order of your comments:

1. The project will comply with Hawaii Administrative Rules, Chapters 11-54 and 11-55 as applicable to the protection of State waters.
2. The area of disturbance exceeds 1.0 acre and a National Pollutant Discharge Elimination (NPDES) for Stormwater Associated with Construction Activities will be required prior to construction. The forthcoming EISPN will state the natural drainage course for the project site is toward Kaukonahua Stream, which is designated Class 2 Inland.

Rainfall collected will be directed to retention basins from which water will be drawn to assist the maintenance of proper moisture content of the composting material. The facility will provide separate stormwater and leachate collection and reuse systems. The leachate will be directed to the leachate collection system for re-processing and will not be discharged to the stormwater collection system. Stormwater is handled in a separate collection system and contained in retention basins on the project site. No discharge from basins is anticipated as the water required for operation will exceed the amount stored. Supplemental water from the well will be required to make up the balance. As a result of stormwater remaining on-site, HER will be requesting an exemption from requiring a NPDES for Storm Water Associated with Industrial Activities.

Hydrotesting and dewatering is not anticipated at this time. Should discharges from dewatering and hydrotesting be required, a NPDES permit will be submitted.

3. The project is not anticipated to increase the discharge of stormwater into State waters. All stormwater generated over proposed impervious surfaced constructed for the composting operation will be kept on site within storm water retention ponds. This water will be used for the composting process.
4. Impacts to surface waters and mitigation measures will be discussed in the forthcoming Draft EIS.
5. The project will not conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into navigable waters. A Section 401 Water Quality Certification is not anticipated.



8135-01

Letter to Mr. Alec Wong, P.E., Chief

Page 2

February 23, 2011

6. We acknowledge that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 Water Quality Certification are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa", is written over a light blue circular stamp.

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services



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

In reply, please refer to:
File:

11-030A CAB

January 24, 2011

EM

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii 96826

RECEIVED
JAN 27 2011
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

SUBJECT: In-Vessel Composting Facility Project, Waialua, Oahu
Environmental Assessment/Environmental Impact Statement
Pre-Assessment Consultation

The project may require an Air Pollution Control Permit from the Department of Health, Clean Air Branch. The owner or operator must comply with all applicable air permit conditions and requirements. If you need assistance in determining whether a permit is required for this project, please contact the Clean Air Branch at the telephone number provided below.

The project should address the potential dust and odor nuisance concerns. Activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust and §11-59-4 on Ambient Air Quality Standards on Hydrogen Sulfide during construction and daily operations. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential dust and odor nuisance problems.

We encourage the contractor to implement a dust control plan, which does not require approval by the Department of Health, to comply with the fugitive dust regulations.

Dust control measures include, but are not limited to, the following:

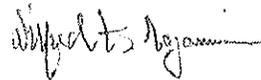
- a) Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;

Mr. Earl Matsukawa, AICP
January 24, 2011
Page 2

- b) Providing an adequate water source at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing dust from shoulders and access roads;
- e) Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling dust from debris being hauled away from the project site. Also, controlling dust from daily operations of material being processed, stockpiled, and hauled to and from the facility.

If you have any questions, please contact Mr. Barry Ching of the Clean Air Branch at 586-4200.

Sincerely,



WILFRED K. NAGAMINE
Manager, Clean Air Branch

BC:rg



8135-01
February 23, 2010

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Wilfred K. Nagamine, Manager
Clean Air Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801-3378

Attention: Mr. Barry Ching

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Nagamine:

Thank you for your letter dated January 24, 2011 (Reference No. 11-030A CAB). We acknowledge the project must comply with Department of Health rules during construction and operation of the facility. Air quality impacts will be discussed in the forthcoming EISPN. An air quality study will be conducted and included in the Draft EIS.

The project will comply with fugitive dust rules and mitigation measures will be implemented as appropriate.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services



EM



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 28, 2010

RECEIVED
DEC 29 2010

WILSON OKAMOTO CORPORATION

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

Attention: Mr. Earl Matsukawa, Project Manager

Ladies and Gentlemen:

Subject: Pre-Assessment Consultation for Environmental Assessment/
Environmental Impact Statement Preparation Notice for Proposed In-
Vessel Composting Facility Project

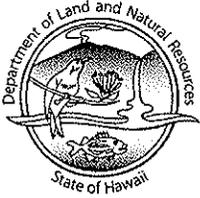
Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Division of Forestry & Wildlife, Engineering Division, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0414. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji
Administrator



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

2010 DEC 1 LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Phone: (808) 587-0433

Fax: (808) 587-0455

December 9, 2010

MEMORANDUM

- TO: **DLNR Agencies:**
- Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Commission on Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division –
 - Historic Preservation

FROM: Charlene Unoki, Assistant Administrator *Charlene*

SUBJECT: Pre-Assessment Consultation for Environmental Assessment/Environmental Impact Statement Preparation Notice for Proposed In-Vessel Composting Facility Project

LOCATION: Island of Oahu

APPLICANT: Wilson Okamoto Corporation on behalf of the City & County of Honolulu, Department of Environmental Services and Hawaiian Earth Recycling LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by December 23, 2010.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*

Date: _____

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/CharleneUnoki
RE:EA Prep Notice In Vessel Compost Facility
Oahu.811

COMMENTS

- () We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone ____.
- (X) **Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone D. The Flood Insurance Program does not have any regulations for developments within Flood Zone D.**
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ____.
- () Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

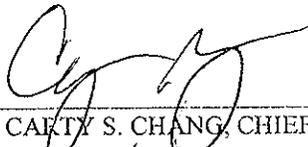
Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- () Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
 - () Mr. Carter Romero at (808) 961-8943 of the County of Hawaii, Department of Public Works.
 - () Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
 - () Ms. Wynne Ushigome at (808) 241-4890 of the County of Kauai, Department of Public Works.
- () The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
 - () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

- () Additional Comments: _____

- () Other: _____

Should you have any questions, please call Ms. Suzie S. Agraan of the Planning Branch at 587-0258.

Signed: 
CARTY S. CHANG, CHIEF ENGINEER
Date: 12/14/10



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809
Phone: (808) 587-0433
Fax: (808) 587-0455

December 9, 2010

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division -
 Historic Preservation

FROM: Charlene Unoki, Assistant Administrator
SUBJECT: Pre-Assessment Consultation for Environmental Assessment/Environmental Impact Statement Preparation Notice for Proposed In-Vessel Composting Facility Project
LOCATION: Island of Oahu
APPLICANT: Wilson Okamoto Corporation on behalf of the City & County of Honolulu, Department of Environmental Services and Hawaiian Earth Recycling LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by December 23, 2010.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

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

Signed: Charlene Unoki
Date: 12-15-10

RECEIVED
LAND DIVISION
2010 DEC 15 P 3:05
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8135-01
February 23, 2010

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

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Tsuji:

Thank you for your letter dated December 28, 2010. We offer the following comments in the respective order of your comments:

Engineering Division

1. We acknowledge that the project site is located within Flood Zone D which is defined as areas in which flood hazards are undetermined, but possible. This will be stated in the forthcoming EISPN. No impacts related to flooding are anticipated given the project site's elevation ranges from 855 feet to 940 feet mean sea level.

Division of Forestry and Wildlife

1. We acknowledge that you have no comments to offer at this time.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

WILLIAM J. AILA, JR.
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

GUY KAULUKUKUI
FIRST DEPUTY

WILLIAM M. TAM
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

January 27, 2011

Earl Matsukawa
Project Manager
Wilson Okamoto Corporation
1907 South Beretania St. Suite 400
Honolulu, HI 96826

RECEIVED
FEB 01 2011
WILSON OKAMOTO CORPORATION

LOG NO: 2010.3912
DOC NO: 1101MV25
Archaeology

EM
TF

Dear Mr. Matsukawa:

**SUBJECT: HRS 6E-8 Historic Preservation Review –
Environmental Assessment/Environmental Impact Statement Preparation Notice
Pre-Consultation for the Waialua In-Vessel Composting Facility
Kamananui Ahupua‘a, Waialua District, O‘ahu Island
TMK Parcel #: (1) 6-5-002:026**

Thank you for the opportunity to comment on the aforementioned EISPN that was received by our office on December 8 2010. We apologize for the delayed review. According to your letter, the City and County of Honolulu plans to develop a green waste composting facility on 112 acres of agricultural land .5 miles north of Schofield Barracks. A review of our records indicates that there are no known archaeological sites within this subject parcel. However, our records also indicate there has been no previous archaeological investigation on this subject parcel. Aerial photographs of this project indicate that the proposed site has been modified and utilized for intensive agriculture. Therefore it is highly unlikely that any historic properties remain within the project area.

Your letter indicates that you plan to prepare an "archaeological resources study" as part of the pending EA/EIS. Because of the likely absence of historic sites within the project area, we suggest that you focus this study on whether or not this planned action will have any visual or indirect impact on the historic properties in the vicinity. Our records indicate that the Kukaniloko Birthing Stones (National Register Site 80-04-0218) are located approx 1.5 miles to the east of the proposed site. In addition, the Kaukonahua gulch just south of the project area was undisturbed by the intensive agriculture, and may contain archaeological resources. Therefore the archaeological study should address any impact this project may have on Kaukonahua gulch.

Please contact Michael Vitousek at (808) 692-8029 or Michael.Vitousek@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

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

Theresa K. Donham
Acting Archaeology Branch Chief
Deputy State Historic Preservation Officer
Historic Preservation Division



8135-01
February 23, 2010

Ms. Theresa K. Donham, Acting Archaeology Branch Chief
Historic Preservation Division
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, HI 96809

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Attention: Mr. Michael Vitousek

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Ms. Donham:

Thank you for your letter dated January 27, 2011 (LOG NO: 2010.3912/DOC NO: 1101MV25). We acknowledge that your review of records indicates no archaeological resources within the project site and that no previous archaeological work has been conducted for the project site.

Visual impacts and environmental impacts to nearby cultural will be discussed in the Draft EIS. An Archaeological Resources Study and Cultural Impact Assessment are being prepared and the results will be included in the Draft EIS.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD10/5437

December 23, 2010

RECEIVED
JAN 06 2011

EM

Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawai'i 96826

WILSON OKAMOTO CORPORATION

**Re: Pre-Environmental Assessment/Impact Statement Preparation Notice
In-Vessel Composting Facility Project
Kamananui, Waialua District, Island of O'ahu**

Aloha e Earl Matsukawa,

The Office of Hawaiian Affairs (OHA) is in receipt of your December 3, 2010 notification of your intent to prepare an Environmental Assessment/Impact Statement Preparation Notice (EA/ISPN) for a proposed in-vessel composting facility project on 38 acres of land in Kamananui on the Island of O'ahu.

Hawaiian Earth Products is proposing to construct the facility which will process up to 100,000 tons of material for composting a year. Operations may be expanded in the future through agreements with the Honolulu City and County (C&C). The facility will take material from existing C&C facilities.

OHA has no specific comments at this time. Thank you for initiating consultation at this early stage and we look forward to reviewing the EA/ISPN and providing additional comments at that time. Should you have any questions, please contact Keola Lindsey at 594-0244 or keolal@oha.org.

'O wau iho nō me ka 'oia'i'o,

Clyde W. Nāmu'o
Chief Executive Officer

8135-01
February 23, 2010



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Clyde Namuo, Chief Executive Officer
Office of Hawaiian Affairs
711 Kapiolani Boulevard, Suite 500
Honolulu, HI 96813

Attention: Mr. Keola Lindsey

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Namuo:

Thank you for your letter dated December 23, 2010 (Reference No. HRD10/5437). We acknowledge that you have no comments to offer at this time. An Archaeological Literature Review and Cultural Impact Assessment are being conducted and the results will be included in the Draft EIS. A copy of the forthcoming EISPN will be sent to you for your review and comment.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services

NEIL ABERCROMBIE
GOVERNOR



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

GLENN M. OKIMOTO
INTERIM DIRECTOR

Deputy Directors
Ford N. Fuchigami
Jan S. Gouveia
Randy Grune
Jadine Urasaki

IN REPLY REFER TO:
DIR 1528
STP 8.0309

January 6, 2011

Mr. Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
JAN 13 2011
WILSON OKAMOTO CORPORATION

EM

Dear Mr. Matsukawa:

Subject: In-Vessel Composting Facility Project
Pre-Assessment Consultation for Environmental Assessment (EA)/
Environmental Impact Statement Preparation Notice (EISPN)

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project.

DOT understands that the City and County of Honolulu, Department of Environmental Services (ENV) and Hawaiian Earth Recycling LLC are proposing to construct an in-vessel composting facility in Waialua. The proposed facility will consist of: truck weighing scale, enclosed tipping and preparation building, open processing area, stormwater retention pond, leachate storage tank, and an open product storage area. These facilities will encompass 38 acres of the 112 acres parcel. The remainder is used for the existing open windrow composting operations (green-waste only) and a demonstration area using compost to assist crop production. Access to the project will be from Wilikina Drive.

DOT does not anticipate any significant adverse impacts to the State transportation facilities. However, the applicant should be informed that a permit is required from DOT Highways Division, to transport oversized and overweight equipment/loads within the State highway facilities.

DOT appreciates the opportunity to provide comments. If there are any questions, or a need to meet with DOT staff, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Very truly yours,

A handwritten signature in black ink, appearing to read "Glenn M. Okimoto".

GLENN M. OKIMOTO, Ph.D.
Interim Director of Transportation



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

8135-01
February 23, 2010

Mr. Glenn M. Okimoto, Interim Director
Department of Transportation
AliiAIMoku Building
869 Punchbowl Street
Honolulu, HI 96813

Attention: Mr. David Shimokawa

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Okimoto:

Thank you for your letter dated January 6, 2011 (Reference No. DIR 1528, STP 8.0309). We acknowledge that the Department does not anticipate any significant impacts to State transportation facilities. If oversized and overweight equipment/loads are transported within the State highway facilities, an application for a permit will be submitted to State DOT Highways Division.

A copy of the forthcoming EISPN will be sent to you for your review and comment.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



December 14, 2010

PETER B. CARLISLE, MAYOR

RANDALL Y. S. CHUNG, Chairman
ANTHONY R. GUERRERO, JR.
WILLIAM K. MAHOE
THERESIA C. McMURDO
ADAM C. WONG

GEORGE "KEOKI" MIYAMOTO, Ex-Officio
MICHAEL D. FORMBY, Ex-Officio

WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
DEC 21 2010
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: Your Letter Dated December 3, 2010 Requesting Comments on the Environmental Assessment (EA)/ Environmental Impact Statement (EIS) Pre-Assessment for the In-Vessel Composting Facility Project, TMK 6-5-2: 26

Thank you for the opportunity to comment on the proposed project.

The Board of Water Supply does not have water facilities in this area. Water service should be provided by a private water system.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,

PAUL S. KIKUCHI
Chief Financial Officer
Customer Care Division



8135-01
February 23, 2010

Mr. Paul Kikuchi, Chief Financial Officer
Customer Care Division
Board of Water Supply
630 South Beretania Street
Honolulu, HI 96843

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Attention: Mr. Robert Chun

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Kikuchi:

Thank you for your letter dated December 14, 2010. We acknowledge that the Board of Water Supply does not have facilities in this area and the project will be serviced by its own private water system.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

EM

PETER B. CARLISLE
MAYOR



DAVID K. TANOUÉ
DIRECTOR
ROBERT M. SUMITOMO
DEPUTY DIRECTOR

2010/ELOG-2633 (BLB)

January 12, 2011

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
JAN 13 2011
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: Pre-assessment Consultation
Environmental Assessment (EA)/Environmental
Impact Statement Preparation Notice (EISPN)
Hawaiian Earth Recycling LLC
In-Vessel Composting Facility Project
Wilikina Drive - Waiialua
Tax Map Key 6-5-2: 26

This is in response to your request, received December 7, 2010, for pre-assessment consultation comments concerning the EA/EISPN for the subject project. We apologize for the lateness in our response, and have the following comments to offer:

Land Use Permits Division Comments:

We understand that the proposed project includes an in-vessel composting facility that will process up to 100,000 tons per year of green waste, food waste, and sewage sludge. The output will be marketable compost products such as soil amendments and potting soil. Please note that our records indicate that the correct zoning of the site is AG-1 Restricted Agricultural District; not AG-2 General Agricultural District, as described in your letter. For purposes of the Land Use Ordinance (LUO), the proposed use is regulated as "major composting." Pursuant to the AG-1 District standards enumerated in LUO Section 21-3.50-4(a) [Table 21-3], a major composting facility is permitted in the AG-1 District subject to an approved Conditional Use Permit (Major). The project site is not in the Special Management Area.

For questions regarding the Land Use Permits Division comments, please contact Blake La Benz of our staff at 768-8016.

Mr. Earl Matsukawa, AICP
January 12, 2011
Page 2

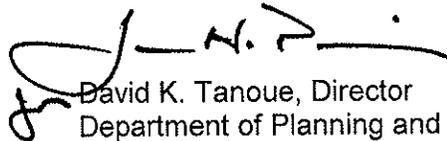
Planning Division Comments:

With regards to the North Shore Sustainable Community Plan, the project is not consistent with the Policies and Guidelines pertaining to Agricultural Lands and Agricultural Support Facilities, since it does not propose to maintain a direct relationship to local agricultural production. Hence there is no relationship between the project and crop production, sales, or research. Our records also indicate that the project site is in the State Land Use Agriculture District. The recycling of off-site green waste, food waste, and the treatment of sewage sludge are not permissible uses within the State Agricultural District, and will require an approved Special Use Permit.

For any questions regarding Planning Division comments, please contact Bonnie Arakawa of our staff at 768-8048.

Thank you for this opportunity to review and comment on the EA/EISPN for the subject project.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. K. Tanoue', written over a horizontal line.

David K. Tanoue, Director
Department of Planning and Permitting

DKT:cs



8135-01
February 23, 2010

Mr. David Tanoue, Director
Department of Planning & Permitting
City & County of Honolulu
650 South King Street
Honolulu, HI 96813

1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
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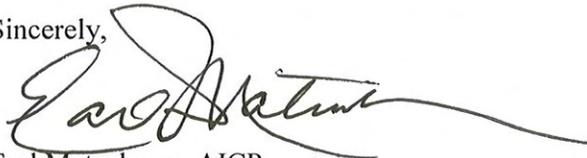
Attention: Mr. Blake La Benz and Ms. Bonnie Arakawa

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Tanoue:

Thank you for your letter of January 12, 2011 conveying comments of your Land Use Permits Division and Planning Division, respectively. Pursuant to our meeting on February 22, 2011 with you and your staff, we will prepare correspondence discussing the nature of the proposed use relative to the permits and plan cited in your letter. We will also request your determination of the applicable land use regulatory requirements. Your determination will be included in the identification of required permits and approvals in the subsequent Draft EIS.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

EM

PETER B. CARLISLE
MAYOR



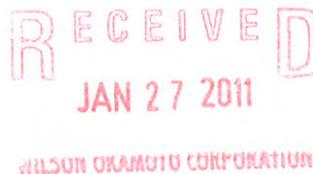
WAYNE Y. YOSHIOKA
ACTING DIRECTOR

KAI NANI KRAUT, P.E.
DEPUTY DIRECTOR

KENNETH TORU HAMAYASU, P.E.
DEPUTY DIRECTOR

TP12/10-394791R

January 25, 2011



Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Pre-Consultation for Environmental Assessment (EA)/Environmental Impact Statement (EISPN): In-Vessel Composting Facility, Wailua, Oahu, Hawaii

This responds to your letter requesting consultation in preparing for an EA/EISPN related to the subject project.

The department wishes to reserve comment on the project pending the preparation of a traffic impact assessment study for the EA/EISPN document. Upon completion of the study, we request that a copy of the study be forwarded to our department for review and comment.

Thank you for the opportunity to participate in your consultation process.

Very truly yours,

A handwritten signature in black ink that appears to read "Wayne Y. Yoshioka".

WAYNE Y. YOSHIOKA
Acting Director

8135-01
February 23, 2010



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Mr. Wayne Yoshioka, Director
Department of Transportation Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN) Pre-Assessment Consultation
In-Vessel Composting Facility Project
Tax Map Key: 6-5-002: 026
Waialua, Oahu, Hawaii

Dear Mr. Yoshioka:

Thank you for your letter dated January 25, 2011 (Reference No. TP12/10-394791R). We acknowledge you wish to reserve comment pending review of the traffic impact assessment report (TIAR) is completed, which will be included in the Draft EIS.

Should you have any questions, please call Tracy Fukuda or myself at 946-2277. Thank you for your participation during the EIS process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

Enclosures

cc: Mr. Greg Apa, Hawaiian Earth Recycling LLC
Mr. Steve Serikaku, City & County of Honolulu Environmental Services



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