NEIL ABERCROMBIE
GOVERNOR

DARRYLL D.M. WONG
MAJOR GENERAL
ADJUTANT GENERAL

JOSEPH K. KIM
BRIGADIER GENERAL (HI)
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

November 18, 2014

State of Hawaii Land Use Commission
Department of Business, Economic Development & Tourism
Daniel E. Orodenker, Executive Officer
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Subject: SP14-404 JAS. W. GLOVER (Hawaii)

Dear Mr. Orodenker:

Thank you for the November 20, 2014 notice for the upcoming Land Use Commission Meeting. The Hawaii Army National Guard (HIARNG) would like to provide comments on docket SP14-404 JAS. W. GLOVER.

The HIARNG notes that the proposed action will consider a request for a Special Permit for quarry and other support services and accessory uses on the remaining 85 acres that are not currently covered under the existing special permit.

The HIARNG, Environmental Branch indicates that the docket indicates an older archeological report. However, the HIARNG would like to note that there is a newer report that could be referenced: Final Archeological Inventory Survey and Monitoring Plan, Phase I, Keaukaha Military Reservation (KMR), Hawaii Army National Guard Facility, Waiakea Ahupuaa, South Hilo District, Island of Hawaii, TMKs (3) 2-1-012:003, 131 and (3) 2-1-013:010. The new report indicates there are three new historic properties (SIHP# 50-10-35-30038, SIHP# 50-10-35-30009, SIHP# 50-10-35-30008) located within 300 meters of the HIARNG/Quarry property line. New historic property site SIHP# 50-10-35-30038 and a previously identified historic property site SIHP# 50-10-35-21658 are both located within 100 meters of the HIARNG/Quarry property line. The HIARNG would like to ensure that adequate measures (i.e. buffer zone, property boundaries are identified) will be taken to protect the newly identified sites.

In addition, the Environmental Branch has Compliance questions/comments that are addressed in the enclosure. Providing this information will help our office comply with existing regulatory rules and regulations for the KMR property.

Subject: SP14-404 JAS. W. GLOVER (Hawaii)

The Defense Engineering Office (HIENG) has requested the assistance of the Department of Land and Natural Resources (DLNR) in the resolution of an overlapping property line issue between HIARNG's Keaukaha Military Reservation (KMR) and the adjacent parcel owned and managed by the Bishop Trust Estate (BTE) and currently leased to Jas. W. Glover, Ltd (JWGL).

Separate and unrelated topographic/boundary surveys completed by independent surveyors hired by HIARNG and JWGL for unrelated purposes has resulted in a property line discrepancy of approximately 10 feet, located on the south-east corner of the BTE parcel adjoining KMR. The KMR survey scope includes a complete boundary survey while the JWGL survey only includes a limited survey in a localized area of interest.

Therefore, the HIENG requests that area in question not be developed until after the property line discrepancy is resolved.

If you have any further questions about our comments, please contact Ms. Dawn Hegger, Ecosystem Specialist (NEPA) at (808) 672-1284.

Sincerely,

Marjean R. Stubbert
Lieutenant Colonel, Hawaii Army National Guard
Construction and Facilities Management Officer

Enclosure

HIARNG ENVIRONMENTAL COMPLIANCE QUESTIONS/COMMENTS

PROJECT NAME: SP14-404 JAS. W. GLOVER Request for Special Permit for quarry and other support services and accessory uses on a 140 acre parcel at Honohononui, Waiakea, South Hilo, Island of Hawaii, Tax Map Key No.s: (3) 2-1-013:004 (por.)	
PROJECT NUMBER:	**SUBMISSION DATE: 17 NOV 2014**
REVIEWER: HIARNG ENV-Compliance	**DATE REVIEWED:**
	DATE RECEIVED:

	COMMENTS
X	Request that the permit applicant provide a Hazardous Material (HM) Inventory of chemical products, including petroleum, oil and lubricants (POLs), to be used/stored on the project site. Inventory information requested includes the product name and manufacturer ID number, container size, amount used, and maximum number of containers to be stored on site at any given day. Also request Safety Data Sheets (SDSs) for the inventoried HM.
X	Request that the permit applicant provide HIARNG an estimate of the maximum amount of hazardous waste, universal waste, and other regulated waste (e.g., asbestos, lead paint chips, fluorescent lamps, PCB ballasts) expected to be generated per month, and the total amount anticipated will be stored on-site at any given time. Also request names of disposal/recycling facilities and transporters to be used for hazardous waste, including their EPA ID numbers; disposal/recycling facilities and transporters used. Recommend that all waste is stored in a secured area until disposal, with signage indicating contact information.
X	Request that the permit applicant provide HIARNG a copy of any site specific Spill Prevention, Control and Countermeasure (SPCC) plan pursuant to 40 CFR 112 (Oil Pollution Prevention).
X	Request that the permit applicant provide HIARNG copies of any site specific environmental permits, including, but not limited to any NPDES permits, and associated documents.
X	Provide HIARNG information on permit applicant constructed NPDES/stormwater best management practices (BMP's) implemented to prevent contaminated stormwater from leaving the site.
X	Request that the permit applicant provide HIARNG the name and phone number for the applicant's emergency POC. Request that the applicant also report and provide information on all POL and HM spills and releases at the project site, to HIARNG.