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PLANNING DEPARTMENT
COUNTY OF HAWAII

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OUR REFERENCE NO.:
035536-6

December 5, 2015

VIA U.S. MAIL

Ben Ishii
Division Chief, Engineering Division
County of Hawai'i, Department of Public Works
101 Pauahi Street, Suite #7
Hilo, Hawai'i 96720

Re: WHC, Ltd. - Amendment to Special Permit No. 833 (Docket No. 92-000001) to Allow a Time Extension to Condition No. 12, Allow Green Waste Composting, and Allow the Processing and Recycling of Portland Cement Concrete and Asphalt Concrete Pavement
TMK No. 6-8-001: 066 (formerly portion of 6-8-001: 005)

Dear Mr. Ishii:

Thank you for your review of the above-referenced application, as noted in your letter dated October 23, 2015, to Mr. Duane Kanuha, Planning Director, County of Hawai'i Planning Department. In your letter you noted that adding new uses and extending the life of the Special Permit could at some time warrant improvements for the access intersection with Waikoloa Road. You asked that the Special Permit amendment be granted with a condition requiring the Applicant to provide improvements to the access road with Waikoloa Road, if required by the Department of Public Works ("DPW").

We wish to assure you that the proposed new uses at the quarry site are not expected to generate any significant additional traffic impacts. Current uses at the quarry average eight truckloads a day of aggregate leaving the site. For most of the year the quarry does not require on-site employees. For a period of approximately three months during the year when active rock crushing and quarrying activities are taking place, there may be six or seven employees on site.

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These employees arrive before 7:00 a.m. and leave the site between 3:30 p.m. and 4:00 p.m.

Greenwaste activities have been taking place at the quarry site for several years. This operation requires one employee who arrives by 7:00 a.m. and leaves the site around 3:30 p.m., and is therefore not on the road during the peak traffic hours. Even if the amount of greenwaste composting increases to the limit of the Department of Health permit, at most only two employees would be needed on site for the operation. The greenwaste composting operation is not a retail operation where members of the public regularly come to drop off greenwaste or purchase compost. Therefore, few employees are needed and little commercial traffic is generated.

The addition of recycling of Portland cement concrete and asphalt concrete pavement is estimated to result in the addition of 2,000 tons of material coming into the quarry each year. That amounts to less than one additional truckload per business day.

The current traffic in and out of the quarry averages eight to ten vehicles each business day. With the addition of the cement and concrete pavement recycling, and an increase in greenwaste composting activities, the average traffic amounts are expected to increase only very minimally. Furthermore, due to the nature of the operations, few vehicles arrive at, or exit, the quarry site during the a.m. or p.m. peak hours. Peak hour trips are understood to mean trips between 7:00 a.m. and 9:00 a.m., and between 4:00 p.m. and 6:00 p.m. Quarry employees typically arrive before 7 a.m. and leave after 5:30 p.m.

Although we do not anticipate any significant traffic impacts from the activities proposed under the Special Permit application, we acknowledge DPW's concerns, and suggest the following language to address DPW's comment, and which we will ask the Planning Commission to incorporate into the Special Permit as a replacement to existing condition #5:

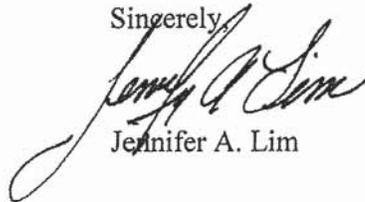
At the written request of the Department of Public Works (DPW), after the fifth anniversary of the issuance of the extended permit, Applicant shall prepare a traffic impact analysis report (TIAR), at no cost to the County of Hawaii, for submission to the DPW. Applicant shall coordinate with the DPW on implementing

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Applicant's pro-rata share of appropriate traffic mitigation measures, if any, should it be determined through the TIAR that improvements to the Waikoloa/Quarry road intersection are needed due to Applicant's activity at the quarry.

We appreciate DPW's participation in this application process. Should you or your staff have any questions about the subject application, please feel free to contact me at 808-523-2557 or jl原因@carlsmith.com.

Sincerely,



Jennifer A. Lim

JAB1/PPT

cc: Jeff Darrow, County of Hawai'i Planning Department
Mel Macy, WHC, Ltd.
WQJ2008 Investment, LLC
Ukumehame Quarry Company Limited Partnership

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