

# **ENVIRONMENTAL ASSESSMENT**

## **YAMADA AND SONS ROCK QUARRY**

### **APPENDIX 1a**

#### **Comments in Response to Early Pre-Consultation**

Note: Early consultation was conducted twice, once on April 19, 2019, for the original 14.99-acre proposal, and again on July 23, 2019, when the area of interest was increased to 51.92 acres. Both consultation letters are included in this appendix, along with the responses that were submitted for each. Subsequently, the proposed size was reduced to 37.882 acres, all within the 51.92-acre footprint, which did not trigger the need for further consultation.

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# geometrician

ASSOCIATES . LLC  
integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawai'i 96721 rterry@hawaii.rr.com

April 8, 2019

Dear Neighboring Property Owner or Agency/Organization Official:

**Subject: Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarrying Purposes, South Hilo District, Island of Hawai'i, TMK 2-1-013:002 (por.)**

I have been contracted by Yamada and Sons, Inc. (Yamada & Sons), to prepare an Environmental Assessment (EA) in compliance with Chapter 343, Hawai'i Revised Statutes. Yamada & Sons proposes to acquire a license to develop a 14.99-acre portion of a State property for use as a rock quarry. The project site is adjacent to existing quarries and is presently vacant and undeveloped. Yamada & Sons requires a new quarry because their existing quarry will soon exhaust its supply of adequate quality material. The quarry would allow the manufacture of engineered products, including base course and components of hot mix asphalt and concrete, that are necessary for the construction of a wide variety of Hawai'i County projects, both public and private. Yamada & Sons would acquire a license with the Department of Land and Natural Resources for use of the site and would pay royalties to the State for materials extracted from the quarry. The proposed quarrying activities would be identical in nature to the ongoing quarrying activities located on adjacent parcels; rock would be excavated with heavy equipment when possible, and when impenetrable rock is encountered, drilling and blasting would be performed. Excavated rock would either be stockpiled on-site or removed and trucked off-site to Yamada & Sons' quarry baseyard located off of Railroad Avenue for crushing/processing and sale. No crushing or sales will be done at the new rock quarry. They anticipate that about 25,000 tons of material would be extracted per month, and with the excavation reaching a maximum depth of about 80 feet, the quarry is expected to have an active lifetime of roughly ten years or more.

An EA is necessary because the property is State land and a license for quarrying purposes is not an exempt action under the State's EIS rules at Hawai'i Administrative Rules 11-200-8. Once complete, the EA will accompany the application for the quarry license. The areas of investigation in the EA will include but not be limited to the following: water quality assurance; wastewater treatment; flora, fauna, and ecosystems; traffic impacts; geology, soils, and hazards; flooding and drainage impacts; social, cultural and community impacts; and historic sites. This letter is to share information about the project and request your input on site conditions, issues that you wish to be addressed in the EA, and any other concerns you may have.

Please contact me at 808-969-7090 or by email at [rterry@hawaii.rr.com](mailto:rterry@hawaii.rr.com) if you have any questions or require clarification. Kindly indicate whether you wish to receive notice of the availability of the Draft EA when it is completed.



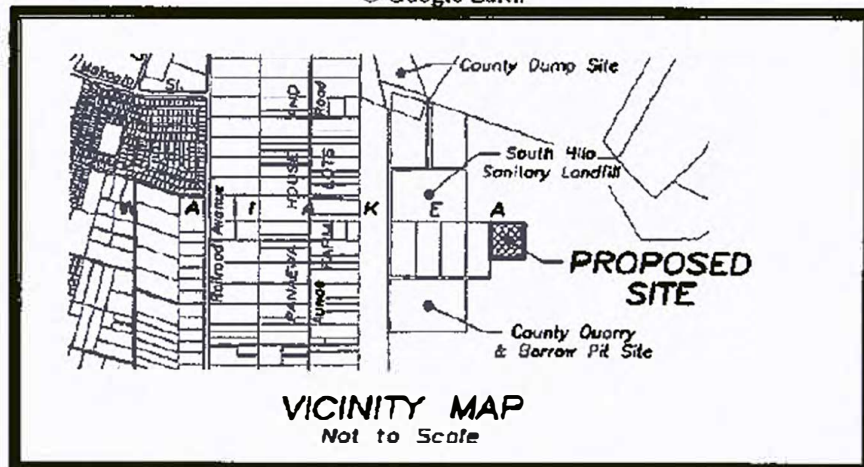
Sincerely,

*Ron Terry*

Ron Terry, Principal  
Geometrician Associates



© Google Earth



**Harry Kim**  
Mayor



**Paul K. Ferreira**  
Police Chief

**Kenneth Bugado Jr.**  
Deputy Police Chief

## County of Hawai'i

### POLICE DEPARTMENT

349 Kapiolani Street • Hilo, Hawai'i 96720-3998  
(808) 935-3311 • Fax (808) 961-8865

April 25, 2019

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

Dear Mr. Terry:

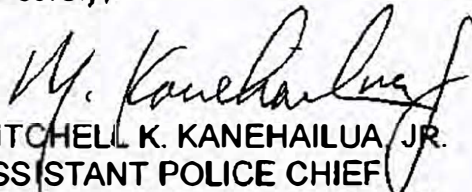
**SUBJECT: EARLY CONSULTATION FOR ENVIRONMENTAL ASSESSMENT FOR  
YAMADA AND SONS, INC. LICENSE ON STATE LAND FOR  
QUARRYING PURPOSES, SOUTH HILO DISTRICT, ISLAND OF  
HAWAII; TMK 2-1-013:002 (POR.)**

Staff, upon reviewing the provided documents, does not anticipate any significant impact to traffic and/or other public safety concerns.

Thank you for allowing us the opportunity to comment. We will not be requesting a copy of the assessment once completed.

If you have any questions, please contact Captain Kenneth Quiocho, South Hilo Patrol, at (808) 961-2214 or via email at [Kenneth.quiocho@hawaiicounty.gov](mailto:Kenneth.quiocho@hawaiicounty.gov).

Sincerely,

  
MITCHELL K. KANEHAILUA, JR.  
ASSISTANT POLICE CHIEF  
AREA I OPERATIONS BUREAU

KQ:lli/19HQ0460



DAVID Y. ICE  
GOVERNOR  
STATE OF HAWAII

JOSH GREEN  
1<sup>ST</sup> VICE GOVERNOR  
STATE OF HAWAII



WILLIAM J. AILA, JR.  
ACTING CHAIRMAN  
HAWAIIAN HOMES COMMISSION

**STATE OF HAWAII  
DEPARTMENT OF HAWAIIAN HOME LANDS**

P. O. BOX 1879  
HONOLULU, HAWAII 96805

May 15, 2019

Mr. Ron Terry  
Geometrician Associates, LLC  
PO Box 396  
Hilo, Hawai'i 96721

Dear Mr. Terry:

**Subject:** Early Consultation for Environmental Assessment for Yamada and Sons, Inc.,  
License on State Land for Quarrying Purposes, South Hilo District, TMK 2-1-  
003:002 (portion)

The Department of Hawaiian Home Lands acknowledges receiving the request for comments on the above-cited project. After reviewing the provided material, this project is located adjacent to DHHL's land holdings in Pana'ewa on Hawai'i Island. DHHL lands are located to the north east, east, south, and west of the parcel where this project is proposed. We have the following comments.

Based on the limited information provided, and the projects close proximity to DHHL's Pana'ewa Homesteads, there is a concern that quarry activities could impact air and noise quality. These should be included in the EA. Additionally, DHHL would like the EA to discuss how the proposed quarry activities compare to the current and historic levels of activity at the existing quarry.

As Yamada and Sons develops their environmental impact assessment documentation, it is important that DHHL's beneficiaries are informed of potential impacts, proposed mitigations, and evaluation of alternatives to the location and scope proposed. DHHL and homestead associations located in Pana'ewa should be included in future consultation conducted regarding this project. A state-wide list of DHHL homesteads is located at <https://dhhl.hawaii.gov/homestead-associations/>. In addition, DHHL encourages Yamada and Sons and its agents to consult with (N)ative Hawaiian organizations when preparing environmental assessments in order to better assess potential impacts to cultural and natural resources, access and other rights of Native Hawaiians.

Mahalo for the opportunity to provide comments. If you have any questions, please contact Malia Cox, at 620-9485 or via email at [malia.m.cox@hawaii.gov](mailto:malia.m.cox@hawaii.gov).

Aloha,

  
William J. Aila Jr., Acting Chairman  
Hawaiian Homes Commission

DAVID Y. IGE  
GOVERNOR



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

JADE T. BUTAY  
DIRECTOR

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

IN REPLY REFER TO  
DIR 0399  
STP 8.2672

May 22, 2019

Mr. Ron Terry  
Principal  
Geometrician Associates, LLC  
PO Box 396  
Hilo, Hawaii 96721

Dear Mr. Terry:

Subject: Yamada and Sons, Inc Quarry  
Early Consultation for Environmental Assessment  
Hilo, Hawaii  
TMK: (3) 2-1-013:002 (por.)

The State of Hawaii Department of Transportation (DOT) understands that Yamada and Sons, Inc. is proposing to acquire a license to develop a 14.99-acre portion of State property for use as a rock quarry. DOT's comments on the proposed project are as follows:

Airports Division (DOT-A)

- 1.n The proposed quarry site is approximately 1.75 miles from the Runway 8/26 centerline atn Hilo International Airport (ITO). The site is next to an existing quarry operation andn does not underlie any approach or departure flight tracks. All projects within 5 milesn from State of Hawaii airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review andn permits. The TAM can be viewed at this link:n [http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports\\_08-01-2016.pdf](http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf)n

The TAM provides a comprehensive list of Federal Aviation Administration advisory n circulars and DOT guidance and requirements for developments close to airports.n

- 2.n DOT-A recommends that the project be coordinated with Hawaii Airports Districtn Assistant Manager, Mr. Steven Santiago at ITO to ensure compliance with existingn regulations.n

**Highways Division**

- 1.i The proposed action is not anticipated to have a significant impact to State highways.i**
- 2.i The Highways Division, Hawaii District Engineer may require mitigation for issues arising from the operation of the quarry or conveyance of material to the baseyard at no cost to the State.i**

If there are any questions, please contact Mr. Blayne Nikaido of the Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

Sincerely,



**for JADE T. BUTAY**  
**Director of Transportation**



DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

May 24, 2019

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

via email: [rterry@hawaii.rr.com](mailto:rterry@hawaii.rr.com)

Dear Mr. Terry:

**SUBJECT: Early Consultation for Environmental Assessment for Proposed Rock Quarry located at Waiakea, South Hilo District, Island of Hawaii; TMK: (3) 2-1-013:002 (por.) on behalf of Yamada & Sons, Inc.**

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

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

Sincerely,

A handwritten signature of Russell Y. Tsuji is located below the "Sincerely," text.

**Russell Y. Tsuji  
Land Administrator**

Enclosures  
cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

19 MAY -2 AM 10:54



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

DEPT. OF LAND AND NATURAL RESOURCES  
STATE OF HAWAII

**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

April 25, 2019

**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 – Hawaii District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Early Consultation for Environmental Assessment for Proposed Rock Quarry

LOCATION:

Waiakea, South Hilo District, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)

APPLICANT:

Geometrician Associates, LLC on behalf of Yamada & Sons, Inc.

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **May 20, 2019**.

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 Darlene Nakamura at 587-0417 or by email at [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

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

Signed:

Carty S. Chang, Chief Engineer

Print Name:

Date:

Attachments  
cc: Central Files

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

**LD/Russell Y. Tsuji**

**Ref: Early Consultation for Environmental Assessment for Proposed Rock  
Quarry**

**Location: Waiakea, South Hilo District, Island of Hawaii**

**TMK(s): (3) 2-1-013:002 (por.)**

**Applicant: Geometrician Associates, LLC on behalf of Yamada & Sons, Inc.**

**COMMENTS**

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

o N Oahu: City and County of Honolulu, Department of Planning and Permitting  
(808) 768-8098

o Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327

o Maui/Molokai/Lanai: County of Maui, Department of Planning (808) 270-7253

o Kauai: County of Kauai, Department of Public Works (808) 241-4846

Signed: \_\_\_\_\_  
CARTY S. CHANG, CHIEF ENGINEER

Date: \_\_\_\_\_



DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**  
**LAND DIVISION**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

April 25, 2019

**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 -- Hawaii District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Early Consultation for Environmental Assessment for Proposed Rock Quarry

LOCATION:

Waiakea, South Hilo District, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)

APPLICANT:

Geometrician Associates, LLC on behalf of Yamada & Sons, Inc.

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **May 20, 2019**.

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 Darlene Nakamura at 587-0417 or by email at [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

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

Signed: /s/ M. Kaleo Manuel

Print Name: Deputy Director

Date: May 2, 2019

Attachments

cc: Central Files

FILE ID:	2019-5098-8
DO CID	117



DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHANCELLOR

BRUCE S. ANDERSON, PH.D.  
WILLIAM D. BALFOUR, JR.  
KAMANA BEAMER, PH.D.  
MICHAEL G. BUCK  
NEIL J. HANNAHS  
PAUL J. MEYER


M. KALEO MANUEL  
DEPUTY DIRECTOR

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
P.O. BOX 621  
HONOLULU, HAWAII 96809

May 2, 2019

REF: RFD.5098.8

TO: Mr. Russell Tsuji, Administrator  
Land Division

FROM: M. Kaleo Manuel, Deputy Director   
Commission on Water Resource Management

SUBJECT: Early Consultation for Environmental Assessment for Proposed Rock Quarry

FILE NO.: RFD.5098.8  
TMK NO.: (3)@-1-013:002 (por.)e

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrn>.

Our comments related to water resources are checked off below.

- ☐ 1.e We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2.e We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3.e We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☐ 4.e We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- ☐ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- ☐ 6. We recommend the use of alternative water sources, wherever practicable.
- ☐ 7.e We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- ☐ 8.e We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at [http://www.hawaiiscap.com/wp-content/uploads/2013/04/LICH\\_Irrigation\\_Conservation\\_BMPs.pdf](http://www.hawaiiscap.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf).

- ☐ 9.I There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- ☐ 10.I The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- ☐ 11.I A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
- ☐ 12.I A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- ☐ 13.I There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- ☐ 14 Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ 15.I A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- ☐ 16.I A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- ☐ 17.I A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- ☐ 18.I The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- ☒ OTHER: The EA will address wastewater treatment; however, what will be the source of water to create the wastewater and how will the wastewater be disposed?

If you have any questions, please contact W. Roy Hardy of the Commission staff at 587-0225.

DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

2019 MAY 13 AM 11:11



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

DEPT. OF LAND AND NATURAL RESOURCES  
LAND DIVISION  
STATE OF HAWAII

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

April 25, 2019

**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 – Hawaii District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Early Consultation for Environmental Assessment for Proposed Rock Quarry

LOCATION:

Waiakea, South Hilo District, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)

APPLICANT:

Geometrician Associates, LLC on behalf of **Yamada & Sons, Inc.**

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **May 20, 2019**.

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 Darlene Nakamura at 587-0417 or by email at [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

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

Signed:

Print Name:

GORDON C. HEIT

Date:

5/9/19

Attachments

cc: Central Filest



DAVID Y. IGE  
GOVERNOR OF HAWAII




SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION**

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

May 9, 2019

**MEMORANDUM**

**TO:** Russell Y. Tsuji, Administrator  
**FROM:** Gordon C. Heit, Hawaii District Land Agent   
**SUBJECT:** Pre-Assessment Consultation – Proposed Rock Quarry

**LOCATION:** Waiakea, South Hilo, Island of Hawaii, TMK: (3) 2-1-013:portion of 002

**APPLICANT:** Geometrician Associates, LLC on behalf of Yamada and Sons, Inc.

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

The proposed location for the rock quarry identified above is within land partially encumbered under the Revocable Permit No. S-4171 to the County of Hawaii for public skeet shooting range purposes:

The Land Division will provide further comments when the Draft Environmental Assessment is available for review.

Please contact me should you have any questions.







DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
**SOLID WASTE DIVISION**

COUNTY OF HAWAII- 345 KEBUANOA ST., SUITE 41- HILO, HI 96720

Tel: (808) 961-8270 Fax: (808) 961-8553

Website: [www.hawaii.zerowaste.org](http://www.hawaii.zerowaste.org)



May 29, 2019

Geometrician Associates, LLC  
PO Box 396  
Hilo, HI 96721  
Mr. Ron Terry, Principal

Subject: Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarry Purposes. South Hilo District, Island of Hawai'i.  
TMK 2-1-013:002(por.)

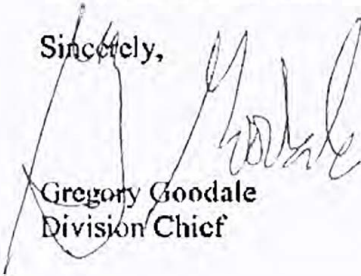
Dear Mr. Terry,

This letter is in response to letter dated April 18, 2019 in response to the subject matter state above. The County is currently in the final stages of completing the consolidation/resubdivision of various parcels within and around the South Hilo Sanitary Landfill. At completion of the consolidation/resubdivision tasks, the State will issue a new EO. One of the component of the consolidation/resubdivision is the creation of a road lot that will be dedicated to the County to become ROW which will end the use of off-road rock haulers. For the purpose of this EA, the applicant is advised that once quarrying operations for the subject parcel becomes active, applicant must use highway legal equipment to haul materials.

Please inform our office when the Draft EA has been published by the OEQC.

Should you have quests or comments regarding this response letter, please contact Solid Waste Division Chief Gregory Goodale at 808-961-8516 or by email at [gregory.goodale@hawaiicounty.gov](mailto:gregory.goodale@hawaiicounty.gov).

Sincerely,

  
Gregory Goodale  
Division Chief



DAVID Y. IGE  
Governor

MIKE MCCARTNEY  
Director



DANIEL E. ORODENKER  
Executive Officer

**LAND USE COMMISSION**  
Department of Business, Economic Development & Tourism  
State of Hawai'i

---

April 29, 2019

Mr. Ron Terry, Principal  
Geometrician Associates, LLC  
P.O. Box 396a  
Hilo, Hawai'i 96721a

Subject: Early Consultation for Environmental Assessment for Yamada and  
Sons, Inc.  
License on State Land for Quarrying Purposes  
South Hilo District, Island of Hawai'i, TMK 2-1-013: 002 (por.)

Dear Mr. Terry:

We are in receipt of your letter dated April 18, 2019, requesting our comments on the subject project. We understand that the project will involve the development of a 14.99-acre rock quarry on State-owned land in Hilo, Hawai'i. The quarry is expected to provide rock material for a variety of construction products, including base course and components of hot mix asphalt and concrete. Heavy equipment would be used for excavation and drilling and blasting would be undertaken as necessary. We further understand the excavated rock will either be stockpiled onsite or removed and transported offsite to the Applicant's quarry baseyard for crushing, processing, and eventual sale. As State-owned land, the Applicant plans to acquire a license with the Department of Land and Natural Resources for use of the site and in turn pay royalties to the State for materials extracted from the quarry. An active lifespan of approximately ten years is expected for the quarry.

Based on review of the Land Use District Boundaries Map (H-66), the proposed quarry site, as represented on the vicinity map, is designated within the State Land Use Agricultural District. As quarries are not permitted within said district, a district boundary amendment or special permit would be required to establish the quarry on the site. The EA should identify what land use entitlement will be sought for the quarry. In addition, your letter states that the quarry site is located adjacent to similar quarries currently in operation. We note one of these quarries was

Mr. Ron Terry, Principal  
April 29, 2019  
Page 2

recently approved by the Land Use Commission ("LUC") in Docket No. SP14-404/Jas W.Glover, Ltd. ("Glover Quarry") on an 85.338-acre site.

According to the applicable tax map, the subject parcel consists of approximately 2,407.756 acres. As you know, there is a 15-acre statutory threshold that demarcates what boundary amendments and special permits are considered by the LUC and the respective counties. The 14.99-acre quarry site is just under this threshold, and therefore as proposed would require consideration only by the County of Hawai'i. Unlike the aforementioned Glover Quarry, we believe this action represents a deliberate act of parcelization in defiance of the spirit and intent of the State Land Use Law promulgated under Hawai'i Revised Statutes chapter 205. It also completely disregards the potential impacts of the quarry on areas of statewide concern, including but not limited to the transportation infrastructure and the ambient air and aural quality of the area. We note that among the concerns expressed about the adjacent Glover Quarry were the possibility of threatened or endangered avian species as well as archaeological features on the site. We believe these areas would not have been comprehensively addressed and mitigated had it not been before the LUC for approval.

Given the above, we request that the Applicant follow the example of the Glover Quarry and reconsider the size of the proposed quarry site. In the alternative, we request that the EA at a minimum provide a thorough discussion of (1) the cumulative impacts of the quarry and the neighboring active quarry operations and non-agricultural uses on the areas of statewide concern identified above and (2) the measures that will be implemented to mitigate such impacts.

Finally, we request that our office receive notice of the availability of the Draft EA when it is completed.

We have no further comments to offer at this time. Should you have any questions or require further clarification, please call our office at 587-3822.

Sincerely,



Daniel E. Orodener  
Executive Officer



# geometrician

ASSOCIATES, LLC  
integrating geographic science and planning

phone: (808) 969-7090 PO Box 396 Hilo Hawai'i 96721 rterry@hawaii.rr.com

July 23, 2019

Dear Neighboring Property Owner or Agency/Organization Official:

**Subject: REVISED Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarrying Purposes, South Hilo District, Island of Hawai'i, TMK 2-1-013:002 (por.)**

This letter supplements a letter of April 18, 2019, that was sent to you concerning Yamada and Sons' proposed license of State land in Hilo for quarrying operations. The extent of the proposed license has been expanded from 14.99 to 51.192 acres, to allow for a longer quarrying period. A map of the area proposed for quarrying, along with a map of the area previously proposed, is provided below.

As stated previously, the project site is adjacent to existing quarries and is presently vacant and undeveloped. Yamada & Sons requires a new quarry because their existing quarry will soon exhaust its supply of adequate quality material. The quarry would allow the manufacture of engineered products, including base course and components of hot mix asphalt and concrete, that are necessary for the construction of a wide variety of Hawai'i County projects, both public and private. Yamada & Sons would acquire a license with the Department of Land and Natural Resources for use of the site and would pay royalties to the State for materials extracted from the quarry. The proposed quarrying activities would be identical in nature to the ongoing quarrying activities located on adjacent parcels; rock would be excavated with heavy equipment when possible, and when impenetrable rock is encountered, drilling and blasting would be performed. Excavated rock would either be stockpiled on-site or removed and trucked off-site to Yamada & Sons' quarry baseyard located off of Railroad Avenue for crushing/processing and sale. No crushing or sales will be done at the new quarry. They anticipate that about 25,000 tons of material would be extracted per month, and with the excavation reaching a maximum depth of about 80 feet, the quarry is expected to have an active lifetime of roughly thirty years or more. It is expected that the Drag Strip Access Road would be rerouted.

An EA is necessary because the property is State land and a license for quarrying purposes is not an exempt action under the State's EIS rules at Hawai'i Administrative Rules. Once complete, the EA will accompany the application for the quarry license. The areas of investigation in the EA will include the following: water quality assurance; wastewater treatment; flora, fauna, and ecosystems; traffic impacts; geology, soils, and hazards; flooding and drainage impacts; social, cultural and community impacts; and historic sites. This letter is to share information about the project and request your input on site conditions, issues that you wish to be addressed in the EA, and any concerns you may have.

Please contact me at 808-969-7090 or by email at [rterry@hawaii.rr.com](mailto:rterry@hawaii.rr.com) if you have any questions or require clarification. Kindly indicate whether you wish to receive notice of the availability of the Draft EA when it is completed.

Sincerely,  
*Ron Terry*

Ron Terry, Principal  
Geometrician Associates





**Harry Kim**  
Mayor



**Paul K. Ferreira**  
Police Chief

**Kenneth Bugado Jr.**  
Deputy Police Chief

## County of Hawai'i

### POLICE DEPARTMENT

349 Kapiolani Street • Hilo, Hawai'i 96720-3998  
(808) 935-3311 • Fax (808) 961-8865

August 5, 2019

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

Dear Mr. Terry:

**SUBJECT: EARLY CONSULTATION FOR ENVIRONMENTAL ASSESSMENT FORa  
YAMADA AND SONS, INC., LICENSE ON STATE LAND FOR  
QUARRYING PURPOSES, SOUTH HILO DISTRICT, ISLAND OF  
HAWAII, TMK 2-1-013:002 (POR.)**

Staff, upon reviewing the provided documents with the additional land portion beinga allocated for use, does not anticipate any significant impact to traffic and/or other publica safety concerns.

Thank you for allowing us the opportunity to comment. We will not be requesting a copy of the assessment once completed.

If you have any questions, please contact Captain Kenneth Quiocho, South Hilo Patrol,a at (808)961-2214 or via email at [Kenneth.quiocho@hawaiicounty.gov](mailto:Kenneth.quiocho@hawaiicounty.gov).

Sincerely,

  
**JAMES B. O'CONNOR**  
ASSISTANT POLICE CHIEF  
AREA I OPERATIONS BUREAUa

KQ:lll /19HQ0460

DAVID Y. IGE  
GOVERNOR



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

JADE T. BUTAY  
DIRECTOR

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

IN REPLY REFER TO:  
**DIR 0756**  
**STP 8.2730**

August 12, 2019

Mr. Ron Terry  
Principal  
Geometrician Associates, LLC  
PO Box 396  
Hilo, Hawaii 96721

Dear Mr. Terry:

Subject: Yamada and Sons, Inc. Quarry  
Revised Early Consultation for Environmental Assessment (EA)  
Hilo, Hawaii  
TMK: (3) 2-1-013:002 (por.)

The Hawaii Department of Transportation (HDOT) understands that Yamada and Sons, Inc. has expanded their previous proposal to acquire a license to develop a 14.99-acre portion of State property for use as a rock quarry. The new proposal is now for 51.192 acres to allow for a longer quarrying period.

HDOT has reviewed the revised early consultation request for the expanded area and wishes to inform you that our prior comments in letter STP 8.2672 dated May 22, 2019 (attached), remains valid.

Please notify us of the availability of the draft EA when it is completed. Further review and additional comments may be provided once HDOT has the opportunity to review the draft EA.

If there are any questions, please contact Mr. Blayne Nikaido of the Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jade T. Butay", written over a horizontal line.

JADE T. BUTAY  
Director of Transportation

Attachment





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

JADE T. BUTAY  
DIRECTOR

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

IN REPLY REFER TO:  
DIR 0399  
STP 8.2672

May 22, 2019

Mr. Ron Terry  
Principal  
Geometrician Associates, LLC  
PO Box 396  
Hilo, Hawaii 96721

Dear Mr. Terry:

Subject: Yamada and Sons, Inc Quarry  
Early Consultation for Environmental Assessment  
Hilo, Hawaii  
TMK: (3) 2-1-013:002 (por.)

The State of Hawaii Department of Transportation (DOT) understands that Yamada and Sons, Inc. is proposing to acquire a license to develop a 14.99-acre portion of State property for use as a rock quarry. DOT's comments on the proposed project are as follows:

Airports Division (DOT-A)

- 1.i The proposed quarry site is approximately 1.75 miles from the Runway 8/26 centerline at Hilo International Airport (ITO). The site is next to an existing quarry operation and does not underlie any approach or departure flight tracks. All projects within 5 miles from State of Hawaii airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link:  
[http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports\\_08-01-2016.pdf](http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf)

The TAM provides a comprehensive list of Federal Aviation Administration advisory circulars and DOT guidance and requirements for developments close to airports.

2. DOT-A recommends that the project be coordinated with Hawaii Airports District Assistant Manager, Mr. Steven Santiago at ITO to ensure compliance with existing regulations.

Highways Division

1.a The proposed action is not anticipated to have a significant impact to State highways.a

2.a The Highways Division, Hawaii District Engineer may require mitigation for issuesa arising from the operation of the quarry or conveyance of material to the baseyard at noa cost to the State.a

If there are any questions, please contact Mr. Blayne Nikaido of the Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

Sincerely,



for JADE T. BUTAY  
Director of Transportation

Harry Kim  
Mayor

Wil Okabe  
Managing Director

West Hawai'i Office  
74-5044 Ane Keohokālole Hwy  
Kailua-Kona, Hawai'i 96740  
Phone (808) 323-4770  
Fax (808) 327-3563



**County of Hawai'i**  
**PLANNING DEPARTMENT**

Michael Yee  
Director

Duane Kanuha  
Deputy Director

East Hawai'i Office  
101 Pauahi Street, Suite 3  
Hilo, Hawai'i 96720  
Phone (808) 961-8288  
Fax (808) 961-8742

August 23, 2019

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

Dear Mr. Terry:

**SUBJECT: Comments for Early Consultation for Environmental Assessment for Yamada & Sons, Inc. License on State Land for Quarrying Purposes  
Tax Map Key: (3) 2-1-013: portion on 002, South Hilo, Hawai'i**

---

This is in response to your letter dated July 26, 2019 requesting early consultation comments for an environmental assessment being prepared for the expansion of the license to allow quarrying on 51.192 acres of land on the above referenced property, which is owned by the State of Hawai'i. The project site is adjacent to existing quarries and is presently vacant and undeveloped.

- 1.a The subject property is 2,407.756 acres in size, is zoned Agricultural (A-20a and A-5a) by the County of Hawai'i and designated as Agricultural by the State Land Use Commission. Section 25-5-72(c)(5) of the Hawai'i County Code, Chapter 25, Zoning, lists "excavation or removal of natural building materials or minerals, for commercial use" as requiring a Special Permit in the State Land Use Agricultural district. On January 6, 2011, Special Permit No. 10-000110 was approved by the Planning Commission to Yamada & Sons, Inc. to allow for the establishment of a quarry and related uses on a 14.99-acre portion of the subject property. A Special Permit will be required to increase the area from 14.99 acres to 51.192 acres from the State Land Use Commission as the request involves an area over 15 acres in size.
- 2.a The General Plan Land Use Pattern Allocation Guide (LUPAG) map designations for the property are Important Agricultural Land (ial), Extensive Agriculture (ea) and Industrial (ind).

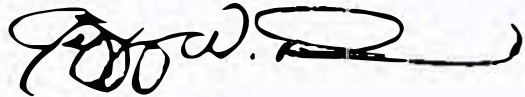


Mr. Ron Terry  
Geometrician Associates  
Page 2  
August 22, 2019

- 3.a The property is not located within the Special Management Area (SMA) and the proposed use is approximately 3 miles from the nearest coastline.a
- 4.a The Land Study Bureau rates the soil type in the area as "E" or "Very Poor".a
- 5.a There is a reference on Subdivision No. 7042 that the proposed location of the quarry is in proximity to the Waiākea-uka flood control project.a

We have no further comments at this time. Please forward us a copy of the draft EA for review. If you have any questions, please feel free to contact Jeff Darrow at 961-8158.

Sincerely,



*RL* MICHAEL YEEa  
Planning Director

JWD:mad

P:\wpwin60 CH343 2019 Yamada & Sons Quarry L.Terry-PreEA Draft Consul-Yamada&SonsQuarry.docxc

cc: SPP 10-000110

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**  
**LAND DIVISION**

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

August 23, 2019

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

via email: [rterry@hawaii.rr.com](mailto:rterry@hawaii.rr.com)

Dear Mr. Terry:

**SUBJECT: REVISED Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarry Purposes located at Waiakea, South Hilo, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)**

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

At this time, enclosed are comments from the (a) Engineering Division, (b) Division of Forestry & Wildlife, and (c) Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be "Russell Y. Tsuji", written over a horizontal line.

Russell Y. Tsuji  
Land Administrator

Enclosures  
cc: Central Files

DAVID V. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION



2019 AUG -7 AM 10:30

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION  
POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

July 31, 2019

**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 – Hawaii District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

**REVISED** Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarry Purposes  
Waiakea, South Hilo, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)  
Geometrician Associates, LLC

LOCATION:

APPLICANT:

Transmitted for your review and comment is information on the above-referenced subject matter. The proposed project was revised to include a larger area, longer license term, and rerouting of the Drag Strip Access Road. Please submit any comments by **August 22, 2019**.

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 Darlene Nakamura at 587-0417 or by email at [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

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

Signed:

Print Name:

Date:

*Carty S. Chang*  
Carty S. Chang, Chief Engineer

*8/1/19*

Attachments

cc: Central Files



DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

JUL 20 AM 11:14

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII



2054  
SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCES  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

July 31, 2019

**MEMORANDUM**

TO: *From*

**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 – Hawaii District
- ☒ Historic Preservation

FROM: *To*

SUBJECT:

Russell Y. Tsuji, Land Administrator *[Signature]*  
**REVISED** Early Consultation for Environmental Assessment for **Yamada and Sons, Inc.** License on State Land for Quarry Purposes  
LOCATION: Walakea, South Hilo, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)  
APPLICANT: Geometrician Associates, LLC

Transmitted for your review and comment is information on the above-referenced subject matter. The proposed project was revised to include a larger area, longer license term, and rerouting of the Drag Strip Access Road. Please submit any comments by **August 22, 2019**.

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 Darlene Nakamura at 587-0417 or by email at [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

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

Signed: *[Signature]*

Print Name: **DAVID G. SMITH, Administrator**

Date: 8/9/19

Attachments

cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**  
**DIVISION OF FORESTRY AND WILDLIFE**  
1151 PUNCHBOWL STREET, ROOM 325  
HONOLULU, HAWAII 96813  
**AUG 20 2019**

SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
OFFICE OF WATER RESOURCES MANAGEMENT

ROBERT K. MASUDA  
FIRST DEPUTY

M. KALEO MANUEL  
DEPUTY DIRECTOR - WATER

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

**MEMORANDUM**

Log no. 2059

**TO:** RUSSELL Y. TSUJI, Administrator  
Land Division

**FROM:** DAVID G. SMITH, Administrator *DGS*

**SUBJECT:** Division of Forestry and Wildlife Comments on the Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarry Purposes.

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding the revised early consultation for the Draft Environmental Assessment for the Yamada and Sons, Inc. quarrying license request in Hilo on the island of Hawai'i, TMK: (3) 2-1-013:002 (por.). The proposed license would allow an expansion of quarrying from 14.99 to 51.192 acres on undeveloped State-owned land for a longer quarrying period of 30 years or more. Excavation activities would involve heavy equipment, drilling, and blasting, and reach a maximum depth of approximately 80 feet. The existing Hilo Drag Strip access road would be rerouted.

The State listed Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of the project area and may roost in nearby trees. Site clearing should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). If this cannot be avoided, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW. Barbed wire should be avoided for any construction because bat mortalities have been documented as a result of becoming ensnared by barbed wire during flight.

The State listed Hawaiian Hawk or 'Io (*Buteo solitarius*) may occur in the project vicinity. DOFAW recommends surveying the area to ensure no Hawaiian Hawk nests are present if trees are to be cut.

DOFAW recommends minimizing the movement of plant or soil material between worksites. Soil and plant material may contain invasive fungal pathogens (e.g. Rapid 'Ōhi'a Death), vertebrate and invertebrate pests (e.g. Little Fire Ants, Coqui Frogs), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the Big Island Invasive Species Committee at (808) 933-3340 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All

equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species. Gear that may contain soil, such as work boots and vehicles, should be thoroughly cleaned with water and sprayed with 70% alcohol solution to prevent the spread of Rapid 'Ōhi'a Death and other harmful fungal pathogens.

DOFAW requests to receive notification of the Draft Environmental Assessment when completed. We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible.

If you have any questions, please contact Jim Cogswell, Wildlife Program Manager at (808) 587-4187 or [James.M.Cogswell@hawaii.gov](mailto:James.M.Cogswell@hawaii.gov).



DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

231 AUG 22 AM 10:43



SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

July 31, 2019

**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 – Hawaii District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

**REVISED** Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarry Purposes

LOCATION:

Waiakea, South Hilo, Island of Hawaii; TMK: (3) 2-1-013:002 (por.)

APPLICANT:

Geometrician Associates, LLC

2019 AUG -1 PM 2:31  
COMMISSION ON WATER  
RESOURCE MANAGEMENT

Transmitted for your review and comment is information on the above-referenced subject matter. The proposed project was revised to include a larger area, longer license term, and rerouting of the Drag Strip Access Road. Please submit any comments by **August 22, 2019**.

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 Darlene Nakamura at 587-0417 or by email at [darlene.k.nakamura@hawaii.gov](mailto:darlene.k.nakamura@hawaii.gov). Thank you.

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

Signed: /s/ M. Kaleo Manuel

Print Name: Deputy Director

Date: August 21, 2019

Attachments  
cc: Central Files

FILE ID:	RFD 52018
DOC ID:	2 139

DAVID Y. IGE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
P.O. BOX 621  
HONOLULU, HAWAII 96809

SUZANNE D. CASE  
CHAIRPERSON


BRUCE S. ANDERSON, PH.D.  
KANANA BEAMER, PH.D.  
NEIL J. HANNANS  
WAYNE K. KATAYAMA  
PAUL J. MEYER

M. KALEO MANUEL  
DEPUTY DIRECTOR

August 21, 2019

REF: RFD.5201.8

TO: Mr. Russell Tsuji, Administrator  
Land Division

FROM: M. Kaleo Manuel, Deputy Director   
Commission on Water Resource Management

SUBJECT: REVISED Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarry Purposes

FILE NO.: RFD.5201.8  
TMK NO.: (3)2-1-013:002 (por.)e

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrn>.

Our comments related to water resources are checked off below.

- ☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☐ 4.e We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- ☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- ☒ 6. We recommend the use of alternative water sources, wherever practicable.
- ☒ 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- ☐ 8.e We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at

[http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH\\_Irrigation\\_Conservation\\_BMPs.pdf](http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf).

- ☒ 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- ☐ 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- ☐ 11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
- ☐ 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- ☐ 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- ☐ 14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- ☐ 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered..
- ☐ 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water..
- ☐ 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- ☒ OTHER: The proposed water source(s) and projected water demands for the project, both potable and non-potable, should be identified and the calculations used to estimate demands should be provided. A discussion of the potential impacts on water resources and other public trust uses of water should be included, and any proposed mitigation measures described. Water conservation and efficiency measures to be implemented should also be discussed.

If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.



DAVID Y. IGE  
GOVERNOR OF HAWAII



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

BRUCE S. ANDERSON, Ph.D.  
DIRECTOR OF HEALTH

In reply, please refer to:  
EM/CWB

08003PCH.19

August 6, 2019

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

Dear Mr. Terry:

**SUBJECT: Early Consultation for Environmental Assessment for Yamada and Sons, Inc. License on State Land for Quarrying Purposes  
South Hilo District, Island of Hawaii, Hawaii  
TMK(s): 2-1-013:002 (por.)**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your request for comment, dated July 23, 2019, requesting early consultation comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. Geometrician Associates, LLC. (Applicant) 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://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>.

- 1.i Any project and its potential impacts to State waters must meet the following criteria:
  - a.i 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.i Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
  - c.i Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2.r You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3.r If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

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); Title 40 of the Code of Federal Regulations, Section 122.2; and HAR, Chapter 11-54.

4.r 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.

5.r It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:

a.r Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources.

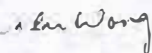


What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b.n Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g., minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.n
- c.n Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.n
- d.n Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.n
- e.n Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.n

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,



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

CH:ms



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