

ENVIRONMENTAL ASSESSMENT

YAMADA AND SONS ROCK QUARRY

APPENDIX 1b

Comments to Draft EA and Responses

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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

November 21, 2019

Geometrician Associates
Attn: Ron Terry
PO Box 396
Hilo, Hawaii 96721

via email: rterry@hawaii.rr.com

Dear Mr. Terry:

SUBJECT: Draft Environmental Assessment for the Proposed **Yamada and Sons Rock Quarry** 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 the request pertaining to the subject matter received from your agent, Geometrician Associates, 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. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or by email at darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell Y. Tsuji", is written over a printed name and title.

Russell Y. Tsuji
Land Administrator

Enclosure(s)

cc: Central Files

Candace Martin, DLNR-Land Division via email: candace.m.martin@hawaii.gov

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

October 25, 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:

SUBJECT:

Russell Y. Tsuji, Land Administrator
Draft Environmental Assessment for the proposed **Yamada and Sons Rock Quarry**

LOCATION:

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

APPLICANT:

Geometrician Associates on behalf of Yamada and Sons, Inc.

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

The DEA can be found on-line at: <http://health.hawaii.gov/oegc/> (Click on The Environmental Notice in the middle of the page.)

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. Thank you.

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

Signed:

Print Name: Carty S. Chang, Chief Engineer

Date:

Attachments
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



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

NOV 15 AM 8:20

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

2019 OCT 25 PM 2:38

RECEIVED
COMMISSION ON WATER
RESOURCE MANAGEMENT

October 25, 2019

MEMORANDUM

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

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Draft Environmental Assessment for the proposed **Yamada and Sons Rock Quarry**

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

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

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

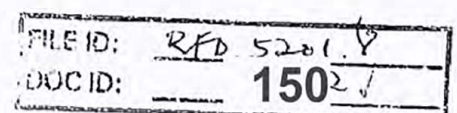
The DEA can be found on-line at: <http://health.hawaii.gov/oegc/> (Click on The Environmental Notice in the middle of the page.)

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. Thank you.

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

Signed: /s/ M. Kaleo Manuel
Print Name: Deputy Director
Date: November 12, 2019

Attachments
cc: Central Files



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 O. CASE
CHAIRPERSON

BRUCE S. ANDERSON, PH.D.
KAMANA BEAMER, PH.D.
MICHAEL G. BUCK
NEIL J. HANNAHS
WAYNE K. KATAYAMA
PAUL J. MEYER

M. KALEO MANUEL
DEPUTY DIRECTOR

November 12, 2019

REF: RFD.5201.8

TO: Mr. Russell Tsuji, Administrator
Land Division

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

SUBJECT: Draft Environmental Assessment for the Proposed Yamada and Sons Rock Quarry

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

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.ee 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.ee 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.ee 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. 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.ee We recommend the use of alternative water sources, wherever practicable.
- ☐ 7.ee 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. 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.

- ☒ 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:

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

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

October 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:

Draft Environmental Assessment for the proposed **Yamada and Sons Rock Quarry**

LOCATION:

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

APPLICANT:

Geometrician Associates on behalf of Yamada and Sons, Inc.

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

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on The Environmental Notice in the middle of the page.)

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. Thank you.

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

Signed: _____

Print Name: _____

Date: _____

Attachments

cc: Central Files

DAVID V. ICE
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

November 4, 2019

MEMORANDUM

TO: Russell Y. Tsuji, Administrator

FROM: Gordon C. Heit, Hawaii District Land Agent 

SUBJECT: Draft Environmental Assessment – 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.

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

The subject property will be sold at public auction pursuant to the Hawaii Revised Statutes §171-54 – Land license, that states in part, the Board of Land and Natural Resources may issue land licenses affecting public lands for a period not to exceed twenty years. No land shall be disposed of except at public auction as provided in this chapter.

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 successful bidder will work with the County on the withdrawal and subdivision of the portion of land within the revocable permit as identified in the Draft Environmental Assessment.

Please contact me should you have any questions.

geometrician

ASSOCIATES, LLC
integrating geographic science and planning

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

January 17, 2020

Candace Martin, Land Agent
Hawaii Island District, Land Division
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Ms. Martin:

Subject: Comments on Draft Environmental Assessment (DEA) for YAMADA AND SONS ROCK QUARRY, Portion of TMK (3rd) 2-1-013:002, Waiākea, South Hilo District, Hawai'i Island

I am in receipt of comment memos on the Draft EA provided by various DLNR units, as well as comment letters from other agencies, organizations and individuals.

In the interest of a complete record, I would first like to acknowledge no comment and/or no additional comments in DLNR memos circulated by the Land Division. We acknowledge here the *no-additional comment* remark of the Engineering Division conveyed by memo of October 23, 2019. Concerning the memos from the other DLNR units, we offer the following responses.

Commission on Water Resources Management

1. 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.

RESPONSE: As stated in the EA, because of the limited scale of construction and the environmental setting, the risks for flooding or impacts to water quality are negligible. There does not presently appear to be any risk for flooding from streams or drainage channels. No impacts to stream banks, stream waters, wetlands, or any other waters of the U.S., will occur, as none are located near the project site.

A grading and grubbing permit will be required. This would involve development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) to contain sediment and storm water runoff during quarrying activities. In addition, in order to minimize the potential for sedimentation and erosion, the contractor shall perform all earthwork and grading in conformance with Chapter 10, Erosion and Sediment Control, Hawai'i County Code. In order to properly manage storm water runoff, the SWPPP will describe the emplacement of a number of Best Management Practices (BMPs) for the project.

2. 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.

RESPONSE. The nature of the use would appear unlikely to produce any appreciable groundwater impacts. The applicant is not aware of any evidence to date that 50-plus years of quarrying in the same general area has produced any impacts to groundwater. Neither the Department of Land and Natural Resources or the Department of Health have heretofore expressed specific concerns during the licensing or permitting processes, or subsequently during quarrying operations. Notwithstanding, the applicant understands that the Department of Health may impose conditions upon the use.

Land Division

1. 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 successful bidder will need to work with the County on the withdrawal and subdivision of the portion of land within the revocable permit as identified in the Draft EA.

RESPONSE: Project planner Harry Yada has confirmed through subsequent discussions with the Land Division that subdivision is not required for a quarrying land license, as a license is a disposition for resource removal and not a permanent land use in the usual sense. However, the County's pursuit of a long term disposition of the remaining skeet range would appear to require subdivision. Should the County pursue a long-term land disposition, Yamada and Sons are aware that if they obtain the license, they should be prepared to cooperate with the County in its efforts to withdraw and subdivide the land for the public skeet shooting range. Yamada and Sons have already been coordinating with the County to ensure that the proposed quarry boundaries do not unduly impact the shooting range and are prepared for further consultation at the appropriate time.

In regard to the comment letters from non-DLNR parties, please see the attached letters. Thank you for circulating the EA for review by DLNR and other agencies. If you have any questions about the EA, please contact me at (808) 969-7090; for questions about matters concerning the application for a land license, please contact Harry Yada, Project Planner, at (808) 640-7813.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: Kaleo Manuel, CWRM; Carty Chang, Engineering; Gordon Heit, Land Division
Harry Yada, Shellby Yamada

From: Cab General <Cab.General@doh.hawaii.gov>

Sent: Friday, November 8, 2019 2:17 PM

To: Martin, Candace M <candace.m.martin@hawaii.gov>; rterry@hawaii.rr.com

Subject: DOH Clean Air Branch Comments on Draft EA for Yamada & Sons Rock Quarry, Waiakea

Aloha

Thank you for the opportunity to provide comments on the subject project.

Please see our standard comments at:

<https://health.hawaii.gov/cab/files/2019/04/Standard-Comments-Clean-Air-Branch-2019.pdf>

Please let me know if you have any questions.

Barry Ching

Clean Air Branch

Hawaii Department of Health

(808) 586-4200

geometrician

ASSOCIATES, LLC
integrating geographic science and planning

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

January 17, 2020

Barry Ching
Clean Air Branch
Hawaii Department of Health
Cab.General@doh.hawaii.gov

Dear Mr. Ching:

Subject: Comments on Draft Environmental Assessment (DEA) for YAMADA AND SONS ROCK QUARRY, Portion of TMK (3rd) 2-1-013:002, Waiākea, South Hilo District, Hawai'i Island


Thank you for your comment email dated November 8, 2019. In answer to your specific comments:

1. Reference to DOH-CAB standard comments at:
<https://health.hawaii.gov/cab/files/2019/04/Standard-Comments-CleanAir-Branch-2019.pdf>

RESPONSE: We reviewed the standard comments as part of EA preparation. We noted in the EA that quarrying activities involve excavation, blasting, offsite crushing of materials, and the operation of multiple units of heavy equipment, which can produce engine emissions and fugitive dust. The potential for noise and dust is one of the reasons that the quarry was sited far away from sensitive uses, in an area a half-mile away from homes, surrounded by other quarries, solid waste facilities, a drag strip, a shooting range, and an airport. The topography and nature of quarrying on this landscape, which occurs in a pit that deepens over time as materials are excavated, helps further reduce air quality impact. Mitigation for dust generated during initial clearing operations would be part of the Best Management Practices described in Section 3.1.2 of the EA. Water trucks for spraying are available during unusually dry periods, during which operations may generate dust. Offsite dust at the existing crushing location is mitigated for by Best Management Practices that are part of permit conditions for the covered and non-covered source permits presently held by Yamada and Sons for rock crushing equipment. These include, e.g., water sprayers at the crusher. These conditions will continue to be in place for the new quarry. Yamada and Sons have also periodically cleaned the road of mud left by large vehicle tires, thus avoiding dust generation as the mud dries.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, stylized "R" and a long, sweeping underline.

Ron Terry, Principal
Geometrician Associates

Cc: Candace Martin, Harry Yada, Shellby Yamada

Harry Kim
Mayor

Wil Okabe
Managing Director

West Hawai'i Office
74-5044 Ane Keohokalole 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

November 5, 2019

Ron Terry
c/o Geometrician Associates
PO Box 396
Hilo, HI 96721

Aloha Mr. Terry

Subject: Comments on the Draft Environmental Assessment (DEA) and Anticipated Finding of No Significant Impact (AFONSI) for the Proposed Yamada and Sons Rock Quarry Expansion Project

Landowner: State of Hawai'i

Location: Waiākea, South Hilo District, County of Hawai'i, Hawai'i

Tax Map Key: (3) 2-1-013:002

The County of Hawai'i Planning Department (PD) is in receipt of your Draft Environmental Assessment (DEA) and Anticipated Finding of No Significant Impact (AFONSI) for the proposed Yamada and Sons Rock Quarry Expansion Project located on the subject parcel. For your reference, the 2,407.75-acre parcel is currently zoned Agricultural 20-acres (A-20a) by the County of Hawai'i, and within the State Land Use (SLU) Agricultural District. The General Plan Land Use Pattern Allocation Guide LUPAG) designates the specific project area of the parcel as Important Agricultural Lands (ial) and possibly areas of Extensive Agriculture (ea) for the most eastern portion of the project area boundary. No portion of the project area is located within the County of Hawai'i Special Management Area (SMA).

On January 6, 2011, Special Permit No. 10-000110 was approved by the Planning Commission to Yamada and Sons, Inc. to allow for the establishment of a quarry and related uses on a 14.99-acre portion of the subject property.

The Planning Department includes the following comments that should be addressed by the applicant prior to completing the Final Environmental Assessment (FEA):

Ron Terry
c/o Geometrician Associates
November 5, 2019
Page 2

- aa Staff notes that a Special Permit will be required for this new proposal to increase the quarry operation area from 14.99-acres to 52.87-acres (addition of 37.88-acres) from the State Land Uses Commission (LUC) since the request involves an area over 15-acres in size.aa
- aa According to comments provided to the applicant by the Commission on Water Resource Management (CWRM) in letters dated August 21, 2019 and May 2, 2019, a request for a discussion of proposed water sources, wastewater, and project water demands was provided. It appears there is no discussion on potable water sources and uses, as well as managing wastewater (if necessary). Please include a discussion of the quarry's current and proposed water usage demands as well as wastewater treatment protocols (i.e., truck washing, bathrooms).aa
- aa It was reported that "modern rubbish" was located within the proposed project area. The Planning Department requests that the applicant work to remove as much "modern rubbish" as possible from the new lease area and dispose of it in an approved refuse facility.aa

If there are any questions regarding this letter, please contact Alex J. Roy at 808-961-8140 or via email at alex.roy@hawaiicounty.gov

Sincerely,



RY
MICHAEL YEE
Planning Director

AJR:mads

\\wpwin60\alcx_roy_ea_eis_review\yamada rock quarry pd_r4c_yamada_rock_quarry_dea.docx

cc: DLNR – Land Division (Hawaii District)

geometrician

A S S O C I A T E S , L L C
integrating geographic science and planning

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

January 17, 2020

Michael Yee, Director
Hawai'i County Planning Dept.
101 Pauahi Street, Suite 3
Hilo HI 96720

Dear Mr. Yee:

Subject: Comments on Draft Environmental Assessment (DEA) for YAMADA AND SONS ROCK QUARRY, Portion of TMK (3rd) 2-1-013:002, Waiākea, South Hilo District, Hawai'i Island

Thank you for your comment letter dated November 5, 2019. In answer to your specific comments:

1. On January 6, 2011, Special Permit No. 10-000110 was approved by the Planning Commission to Yamada and Sons, Inc. to allow for the establishment of a quarry and related uses on a 14.99-acre portion of the subject property. Staff notes that a Special Permit will be required for this new proposal to increase the quarry operation area from 14.99-acres to 52.87-acres (addition of 37.88-acres) from the State Land Uses Commission (LUC) since the request involves an area over 15 acres in size.

RESPONSE: The need for Special Permit is noted in several places in the EA. Yamada and Sons will coordinate with your office at the conclusion of the Chapter 343 and license auction processes to prepare and process a Special Permit application.

2. According to comments provided to the applicant by the Commission on Water Resource Management (CWRM) in letters dated August 21, 2019 and May 2, 2019, a request for a discussion of proposed water sources, wastewater, and project water demands was provided. It appears there is no discussion on potable water sources and uses, as well as managing wastewater (if necessary). Please include a discussion of the quarry's current and proposed water usage demands as well as wastewater treatment protocols (i.e., truck washing, bathrooms).

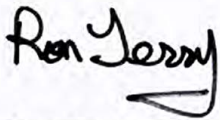
RESPONSE: Section 3.1.1 of the EA notes that no appreciable amount of water is needed - very small quantities are occasionally sprayed via a water tanker for dust suppression - and no wastewater will be produced, as the facility will utilize a portable toilet, as it does currently. Usually, there is only one (1) employee working at the rock quarry site full time so these measures have been more than sufficient. There is no need for any water pipelines or plumbing and no wastewater lines. Trucks will not be washed on the site. There will be no additional demand on the aquifer, wastewater or stormwater systems.

3. It was reported that “modern rubbish” was located within the proposed project area. The Planning Department requests that the applicant work to remove as much rubbish as possible from the new lease area and dispose of it in an approved refuse facility.

RESPONSE: Yamada and Sons will work with DLNR to properly dispose of rubbish (most of which was emplaced as part of County projects in the 1960s) during quarry excavation, as they have consistently done for all previous quarries.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is stylized, with the first name "Ron" and last name "Terry" clearly legible.

Ron Terry, Principal
Geometrician Associates

Cc: Candace Martin, Harry Yada, Shellby Yamada

Dean Fukuchi
1220 Puhau St
Hilo HI 96720

8 Nov 2019

State of Hawaii
Dept of Land and Natural Resources
Attn: Candance M. Martin,
PO Box 621
Honolulu Hawaii 96809

Subject: Sale of a Quarry License at Public Auction on State lands situated at (3) 2-1-013 :002

References:

- a. 2019-10-23-HA-DEA- Yamada and Sons Rock Quarry
- b. 2007-02-08-HA-FEA- Yamada and Sons Quarry

It appears reference a. project is being resubmitted without any lesson learned from an earlier submission made as reference b. project.

It is my understanding the major issue in the past and today, is the applicant uses of explosive in close proximity of an existing land fill site, would contribute to the expansion of the underground fissure cracks and cause the land fill to release leachate into the ground water table below.

The protection of ground water needs to be addressed to prevent further unnecessary contamination from occurring.

Sincerely,

Signed
Dean Fukuchi

geometrician

A S S O C I A T E S , L L C
integrating geographic science and planning

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

January 17, 2020

Dean Fukuchi
1220 Puhau St
Hilo HI 96720

Dear Mr. Fukuchi:

Subject: Comments on Draft Environmental Assessment (DEA) for YAMADA AND SONS ROCK QUARRY, Portion of TMK (3rd) 2-1-013:002, Waiākea, South Hilo District, Hawai'i Island

Thank you for your comment letter dated November 8, 2019. In answer to your specific comments:


1. Need to address applicant's uses of explosive in close proximity of an existing land fill site, which would contribute to the expansion of the underground fissure cracks and cause the landfill to release leachate into the ground water table below. The protection of ground water needs to be addressed to prevent further unnecessary contamination from occurring.

RESPONSE: Blasts are directed for maximum effect on the targeted rock source. For example, when the quarry operators are close to the perimeter of the quarry, they place the explosives in such a position so as to direct the force so it fractures the exposed face in the quarry and blows in towards the center of the quarry. If blasting somewhere closer to the middle of the quarry, they to direct the force of the blast inward and upward to maximize the fracturing of the rock while minimizing the footprint of where the blasted rock lies. In both the applicant's and the explosives technician's extensive experience, significant fracture of the rock does not occur farther than 300 feet in the targeted direction from the blasting site, and would not occur beneath or on the landfill, which is over 500 feet away.

More importantly, the lava flow geology in all of Pana'ewa is full of natural cracks and interconnected pores and is thus slowly but fully permeable to rainwater. All rainwater that is not evapotranspired percolates from the surface, through unsaturated rock to the water table, and out to sea through fully saturated rock. This percolation does not rely on manmade fractures in the rock. If this were not true, water would rapidly fill up all the pore space near the surface and create lakes which would then outlet via streams that would flow to the sea. Leachate from the landfill flows along with all other percolated rainfall out to sea. The project would cause no noticeable effects to the aquifer or surface water quality.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive style with a large, stylized "R" and a long, sweeping underline.

Ron Terry, Principal
Geometrician Associates

Cc: Candace Martin, Harry Yada, Shellby Yamada

November 8, 2019

Via U.S. mail and email:

Department of Land and Natural Resources
P.O. Box 521
Honolulu, HI 96809

Attention: Ms. Candace Martin

Re: Draft Environmental Assessment (AFNSI)
Yamada and Sons Rock Quarry
TMK: (3) 2-1-013:0002

Dear Ms. Martin:

Thank you for the opportunity to comment on the Draft Environmental Assessment for the proposed Yamada and Sons Rock Quarry referenced above (published October 23, 2019), specifically with respect to issues and concerns regarding light pollution.

The University of Hawai'i Institute for Astronomy (IfA) conducts research in astronomy using telescopes located on Haleakalā and Maunakea and operated by IfA and our partner institutions. Both Haleakalā and Maunakea are among the best sites in the world for astronomical facilities because of their elevation, clear skies, favorable atmospheric conditions, and low levels of light pollution. Hawai'i-based observatories have played major roles in the advancement of astronomy and astrophysics for over 50 years and are well positioned to remain at the forefront of astronomical research for decades to come.

Because of the outstanding quality and productivity of these facilities, IfA is acutely concerned about negative impacts on astronomy from increased light pollution. Our work to combat light pollution has also brought us into contact with others concerned about light pollution for other reasons, including impacts on wildlife (particularly seabirds) and on human health.

With that background, we offer the following comments:

The draft EA does not provide enough information to comment on the adverse effect that the facility will have on the astronomical observatories on Maunakea. It merely mentions the possibility that select energy efficient lighting will be used. The type of light is not mentioned. The amount of light is not mentioned. Our experience has shown that quarries that operate at night can be tremendously damaging to the dark night sky. Limiting operations at the quarry to daytime operations would avoid this problem. If night time operation is intended, then lighting used must conform with the County of Hawai'i listing ordinance, which is presently undergoing a major revision.

Any new or additional artificial light at night has an adverse effect on astronomical observations by increasing the night sky brightness. Nearly all observations performed by the telescopes on Maunakea are sky-background limited. This means that there is a natural sky brightness coming from airflow and zodiacal light. Artificial light increases the sky brightness, thereby decreasing the sensitivity of the telescopes.

Lights can have an adverse effect on astronomical observations by incrementally increasing the night sky brightness, effectively making the telescope smaller and less sensitive.

Appropriate steps to reduce the impact on the observatories would include:

1. Use NO light at night. This is the preferred approach. If no light is used, then there would be no impact on the observatories.
2. Using lights that are activated by motion sensors, in a manner such that no light is emitted when no one is at the facility. Our understanding is that most of the activity at the facility will be during the daytime, so we believe that use of only lights that are activated by motion will be a good step to reduce impact on the observatories. We also believe that this strategy will improve security compared to static lighting because presence of a light will indicate presence of a person who should not be there.
3. Any lighting at the facility must follow the Hawai'i County lighting ordinance. Note that revisions to the county lighting ordinance are presently being discussed, and may occur in the next few months. All lighting must be fully shielded. This means that all lighting fixtures must emit zero light above the horizontal plane.
4. The minimum possible amount of outdoor lighting should be used. Motion sensor activated lighting is strongly preferred. Blue light is most harmful to the observatories, so blue-deficient lighting should be exclusively selected. The best choices are filtered LED lights, or amber LED lights. Under no circumstances should high-intensity discharge lamps such as metal halide be used; fluorescent lights also must be avoided. Both of these types of lamps use mercury and emit light at wavelengths that is very damaging to astronomy.
5. White light should be avoided because the blue component of white light is very damaging to astronomy. White light should only be used for tasks that require full color rendition, and is not appropriate for parking lots or security lighting. White light should always have a Correlated Color Temperature of 2700 K or below.

Thank you for your consideration of these comments and attention to IfA's concerns. If you have questions or need further detail regarding these comments, please do not hesitate to contact the undersigned or Richard Wainscoat (rjw@hawaii.edu).

Very truly yours,



Robert McLaren
Interim Director

cc: Mr. Harry Yada, Yamada & Sons
Mr. Ron Terry, Geometrician Associates

geometrician

A S S O C I A T E S , L L C
integrating geographic science and planning

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

January 17, 2020

Dr. Robert McLaren, Interim Director
University of Hawai'i Institute for Astronomy
2680 Woodlawn Drive
Honolulu HI 96822

Dear Dr. McLaren:

Subject: Comments on Draft Environmental Assessment (DEA) for YAMADA AND SONS ROCK QUARRY, Portion of TMK (3rd) 2-1-013:002, Waiākea, South Hilo District, Hawai'i Island

Thank you for your comment letter dated November 8, 2019. In answer to your specific comments:

1. The draft EA does not provide enough information to comment on the adverse effect that the facility will have on the astronomical observatories on Maunakea. It merely mentions the possibility that select energy efficient lighting will be used. The type of light is not mentioned. The amount of light is not mentioned. Our experience has shown that quarries that operate at night can be tremendously damaging to the dark night sky.

RESPONSE: As stated in the EA, the quarry currently operates and is expected to continue to operate in daytime hours only. The discussion of lighting in the EA is related mainly to indoor lighting for offices. All exterior lighting of office facilities conforms to the Hawai'i County outdoor lighting ordinance. Although lighting will not occur within the quarry, Yamada and Sons takes notes of your recommendations concerning the spectra and quantity of lighting in the context of its other operations.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090.

Sincerely,



Ron Terry, Principal
Geometrician Associates

Cc: Candace Martin, Harry Yada, Shellby Yamada

DAVID Y. IGE
GOVERNOR



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
STP 19-115
STP 8.2790

November 22, 2019

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

Dear Mr. Terry:

Subject: ' Yamada and Sons, Inc Quarry
Draft 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. proposes to lease land from the Department of Land and Natural Resources that is adjacent to their existing quarry operation for the purpose of continuing their quarry operation. DOT's comments on the subject project are as follows:

Airports Division

1.aaPage 37 (PDF Reader, p. 48) states that "the proposed project does not appear to requireaa such a notice (of Proposed Construction or Alteration with the Federal Aviationaa Administration), and it involves no hazardous wildlife attractants, glint or glare hazardsaa or aerial obstructions. No effect to the facilities or operation of Hilo International Airportaa (ITO) is anticipated."aa

Although the project involves no hazardous wildlife attractants, if conditions such asaa standing water attracts wildlife, Yamada and Sons shall mitigate the wildlife attractant toaa ensure flight safety to ITO.aa

2.aaPlease coordinate project development activities with Mr. Steven Santiago, ITO Airportaa District Manager, to ensure compliance with existing regulations.aa

Mr. Ron Terry
November 22, 2019
Page 2

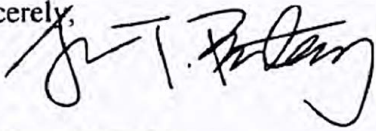
STP 8.2790

Highways Division

Since the proposal is to continue an existing operation from roughly the same vicinity and make use of County roads for quarry operations between the applicant's quarry and their quarry base yard on Railroad A venue, this activity will not impact our State highway facilities.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Jade T. Butay", written over the word "Sincerely,".

JADE T. BUTAY
Director of Transportation

geometrician

A S S O C I A T E S , L L C
integrating geographic science and planning

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

January 17, 2020

Jade Butay, Director
State Of Hawai'i
Department Of Transportation
869 Punchbowl Street
Honolulu HI 96813-5097

Dear Mr. Butay:

Subject: Comments on Draft Environmental Assessment (DEA) for YAMADA AND SONS ROCK QUARRY, Portion of TMK (3rd) 2-1-013:002, Waiākea, South Hilo District, Hawai'i Island

Thank you for your comment letter dated November 22, 2019. In answer to your specific comments:

Airports Division

1. Page 37 states that the proposed project does not appear to require a Notice of Proposed Construction or Alteration with the Federal Aviation Administration, and it involves no hazardous wildlife attractants, glint or glare hazards or aerial obstructions. No effect to the facilities or operation of Hilo International Airport (ITO) is anticipated. Although the project involves no hazardous wildlife attractants, if conditions such as standing water attracts wildlife, Yamada and Sons shall mitigate the wildlife attractant to ensure flight safety to ITO.

RESPONSE: The applicant understands these requirements, anticipates no wildlife attractants or other hazards, and the Final EA has been augmented to discuss the fact that the project will not involve standing water.

2. Please coordinate project development activities with Mr. Steven Santiago, ITO Airport District Manager, to ensure compliance with existing regulations.

RESPONSE: If and when Yamada and Sons receives its license to conduct quarrying on the property, they will conduct additional coordination with the airport manager. If another bidder obtains the license, they will be provided with this documentation.

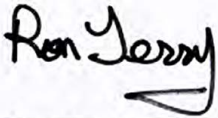
Highways Division

1. Since the proposal is to continue an existing operation from roughly the same vicinity and make use of County roads for quarry operations between the applicant's quarry and their quarry base yard on Railroad Avenue, this activity will not impact State highway facilities.

RESPONSE: Thank you for this confirmation.

We very much appreciate your review of the document. If you have any questions about the EA, please contact me at (808) 969-7090.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is stylized with a large, looped "R" and a cursive "Terry".

Ron Terry, Principal
Geometrician Associates

Cc: Candace Martin, Harry Yada, Shellby Yamada