

Appendix [A] A-1

EISPN COMMENT LETTERS AND RESPONSES



United States Department of the Interior

NATIONAL PARK SERVICE
Pacific Island System Support Office
390 Ala Moana Blvd., Box 50165
Room 6305
Honolulu, Hawaii 96817-4941

1.7617(PUJIO)

November 17, 2000

Chester T. Koga
R.M. Towill Corporation
420 Waiakamilo Road
Honolulu, Hawaii 96817-4941

Dear Mr. Koga:

We have reviewed the Environmental Impact Statement (EIS) Preparation Notice for the Hawaii Commercial Harbors 2020 Master Plan, Island of Hawaii. Our comments are related to the adverse effects which proposed harbor related improvements would have on the State-owned Pelekane area of Pu'ukohola Heiau National Historic Site. Pelekane is an area of major importance in Hawaiian history and contains the remains of several archeological sites.

Pelekane is known to be the site of an ancient royal Hawaiian compound, consisting of a royal residence and housing for Big Island ruling chiefs. Several prominent figures in Hawaiian history are associated with Pelekane, including Kamehameha I, Kamehameha II and Queen Emma. Major portions of the Pelekane area are being proposed for the construction of a cargo expansion area and liquid bulk terminals. These developments have great potential to not only adversely affect Hawaiian archeology, but also the historical integrity of the entire Pelekane area.

During the preparation of the EIS, we suggest you contact Daniel Kawaiaca, Superintendent of Pu'ukohola Heiau National Historic Site for additional information. The park's address is P.O. Box 44340, Kawaihae 96743 and the phone number is (808) 882 7218.

Sincerely,


Bryan Hahry
Superintendent

cc:
Daniel Kawaiaca, PUJIO

BENJAMIN J. CAYENNE
GOVERNOR



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

BRIAN K. LAMANA
DIRECTOR
DEPUTY DIRECTORS
GLENN J. CRISTO
JUDITH Y. BRUSCHI

BY TELETYPE TO:

Mr. Brian Harry
Page 2
January 26, 2001

HAR-EP
1608.01

expressed concerns about the potential noise and visual impacts that the proposed liquid bulk terminal might have on the Puukohola Heiau National Historic Site. The DEIS will include discussions of how any noise or visual impacts will be avoided or minimized as well as any mitigation measures that will be necessary.

We appreciate the assistance the National Park Service has provided on this matter. If you have any questions or require additional information, please call Mr. Glenn Soma, Harbors Division Planner, at 587-2503.

Very truly yours,

Thomas T. Fujikawa
Harbors Administrator

Attachment: Cooperative Agreement No. H-98-8
Figure: 2020 Master Plan Improvements, Kawaihae Harbor

c: Daniel Kawana, Superintendent
Puukohola National Historic Site

cc: HAR-E, -H

GA/DW:sd

HAR-EP
1608.01

Mr. Bryan Harry, Superintendent
U. S. Department of Interior, National Park Service
Pacific Island System Support Office
300 Ala Moana Boulevard, Box 50165
Room 6305
Honolulu, Hawaii 96850

Dear Mr. Harry:

Subject: Environmental Impact Statement Preparation Notice (EISP/N) for the Hawaii
Commercial Harbors 2020 Master Plan, Island of Hawaii

Thank you for your letter dated November 17, 2000 which was addressed to our consultant,
R. M. Towill Corporation, providing comment on the above referenced EISP/N.

Your letter expressed concern about the adverse effects of the proposed harbor improvements
would have on the Pelekae lands. The Pelekae lands (as provided by Cooperative Agreement
No. H-98-8 between the National Park Service and the State Department of Transportation,
Harbors Division, attached) provides a state-owned buffer zone that separates the
archaeologically significant Puukohola Heiau National Historic Site from the commercial harbor
area. As stated in the *Hawaii Commercial Harbors 2020 Master Plan*, the Harbors Division
intends to preserve all lands as provided by the above-referenced agreement as a buffer zone. The
proposed liquid bulk terminal will be adjacent to the Pelekae lands. The Draft Environmental
Impact Statement (DEIS) will include a map of proposed improvements that shows the agreed-
upon buffer zone (attached). Further, the DEIS will cover any potential impacts that the
proposed improvements will have on nearby archaeological resources.

As suggested in your letter, we have contacted your staff member, Mr. Daniel Kawana,
Superintendent of the Puukohola Heiau National Historic Site. During our conversation, he



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

December 10, 1999

Board of Land and Natural Resources
State of Hawaii
Honolulu, Hawaii 96813

KAZU HAYASHIDA
DIRECTOR

DEPUTY DIRECTORS
OCEANIC DIVISION
BRANCH MANAGER

IN REPLY REFER TO

REMARKS:

The United States Department of the Interior, National Park Service (NPS), is requesting a five (5) year extension on the subject cooperative agreement. The NPS utilizes the property solely to conduct educational workshops in conjunction with the Pu'ukohola Heiau National Historic Site, and will not use the property for any other purpose without the prior written consent of the State. The Land Board originally approved the original agreement at its meeting of March 23, 1989 under agenda item J-6 for a term from January 1, 1990 to December 31, 1994. At its meeting of November 18, 1994 under agenda item K-6, the Land Board authorized the extension of the subject cooperative agreement from January 1, 1995 to December 31, 1999.

RECOMMENDATION:

That the Board consent to the five (5) year extension of Cooperative Agreement No. H-89-8 issued to the United States Department of the Interior, National Park Service in accordance with the terms and conditions outlined above and such terms and conditions as may be prescribed by the Director of Transportation.

Respectfully submitted,

Kazu Hayashida

KAZU HAYASHIDA
DIRECTOR OF TRANSPORTATION

Attachment

APPROVED FOR SUBMITTAL:

Timothy E. Johns

TIMOTHY E. JOHNS
CHAIRPERSON AND MEMBER

HAWAII

FIVE YEAR EXTENSION OF COOPERATIVE AGREEMENT
NO. H-89-9 ISSUED TO THE UNITED STATES DEPARTMENT OF
THE INTERIOR AT KAWAIIHAE, KOHALA, HAWAII

STATUTE: Sections 171-95, Hawaii Revised Statutes

APPLICANT: THE UNITED STATES DEPARTMENT OF THE INTERIOR,
NATIONAL PARK SERVICE (NPS)

AREA: Approximately 22 acres

LOCATION: Kawaihae Harbor, South Kohala, Hawaii
Tax Map Key No. 3rd/6-1-03-25 (Portion)
Governor's Executive Order: 1988

PURPOSE: Non-exclusive use to promote educational and interpretive programs
related to the Pu'ukohola Heiau National Historic Site.

RENTAL: Gratis

TERM OF LEASE
EXTENSION:

January 1, 2000 to December 31, 2004

Approved by the Board
at its meeting held on

12/10/99

ITEM K-2

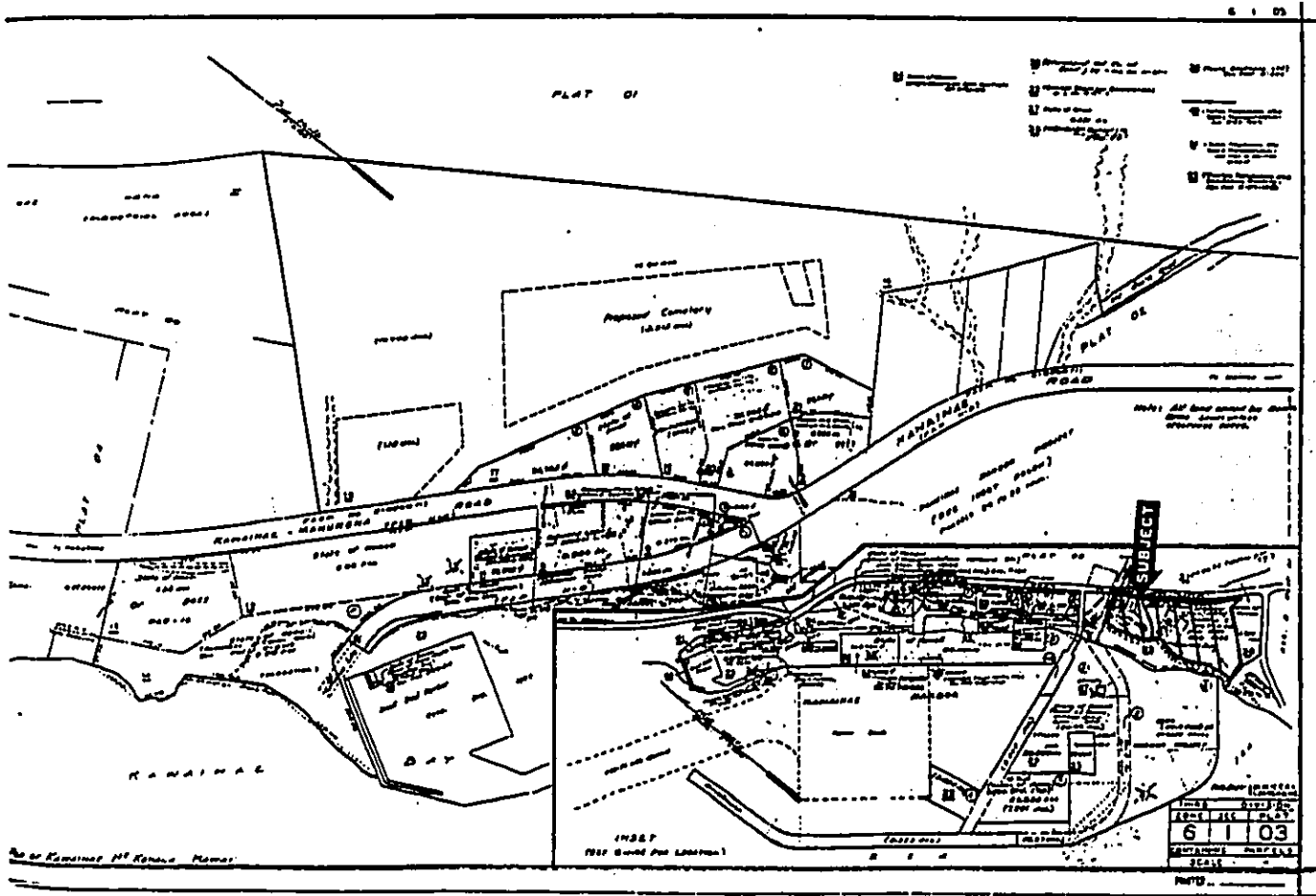
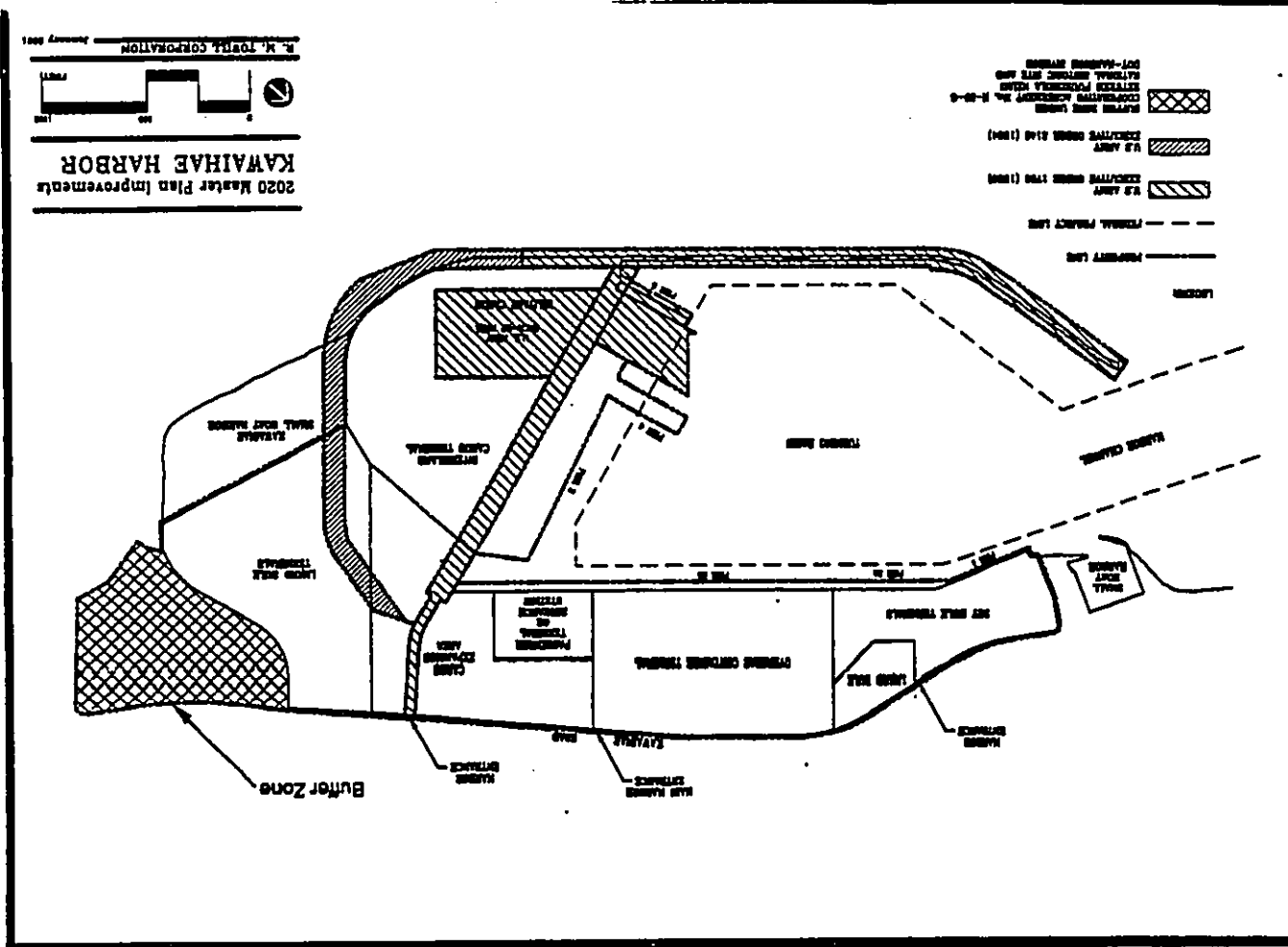


EXHIBIT "A"

PHONE (808) 594-1888

FAX (808) 594-1885



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPOLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

November 29, 2000

Mr. Chester T. Koga, AICP
R.M. Towill Corporation
420 Waiakamilo Road
Honolulu, HI 96817-4941

Subject: Environmental Impact Statement Preparation Notice (EISP)
For the Hawaii Commercial Harbors 2020 Master Plan
Island of Hawaii, State of Hawaii

Dear Mr. Koga:

Thank you for the opportunity to comment on the above referenced project. According to the EISP, the Hawaii Commercial Harbors 2020 Master Plan is a conceptual-level land use plan addressing future development of the Island of Hawaii's interdependent commercial harbors at Hilo and Kawaihae. The Office of Hawaiian Affairs offers the following comments:

Act 50, Session Laws of Hawaii (SLH) - Regular Session of 2000

The purpose of Act 50, SLH 2000, is to:

- 1) "Require that environmental impact statements include the disclosure of the effects of a proposed action on the cultural practices of the community and State;
- 2) Amend the definition of "significant effect" to include adverse effects on cultural practices."

OHA requests that the DEIS identify and address the effects on Native Hawaiian culture and traditional and customary rights pursuant to Section 343-2, Hawaii Revised Statutes, as amended.

Mr. Chester T. Koga, AICP
R.M. Towill Corporation
November 29, 2000
Page Two

The cultural assessment should include consultations with individuals and/or organizations with expertise and knowledge of the Hilo and Kawaihae areas. These consultations should encompass the types of cultural resources, practices and beliefs found within the district or ahupua'a of the proposed project areas.

We anticipate the Draft Environmental Impact Statement for our further review and comment. If you have any questions, please contact Mark A. Mararagan, policy analyst at 594-1945, or e-mail him at mmarragan@oha.org.

Sincerely,

Colin C. Kippen, Jr.
Deputy Administrator
cc: OHA Board of Trustees
Hilo CAC
Kona CAC

BENJAMIN J. CAYetano
GOVERNOR



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

January 30, 2001

IMMEDIATE REFERENCE

GRANT K. MURRAY
DIRECTOR
DEPUTY DIRECTORS
GLENNAL C. MOTO
JUDITH Y. URSAM

Colin C. Kippen, Jr.
Page 2
January 30, 2001

HAR-EP
1637.01

extensive oral histories with long-time Kawaihae residents were taken in preparation of the Cultural Survey Hawaii's report *Archaeological Survey and Testing, Kawaihae, South Kohala, Hawaii*. Informants included Akau, Masaru Doi, and Eddie La'au, Jr. Further, David Kawaiata, Superintendent of the Puukohola Heiau National Historic Site, provided names of additional resources that are familiar with cultural practices in the vicinity of Kawaihae Harbor. All of these will be included in the DEIS.

We look forward to your review of the DEIS. If you have any questions or require additional information, please contact Glenn Soma, Harbors Division Planner, at 587-2503.

c: R. M. Towill Corporation

bc: HAR-E, HAR-H

GAJDW:lm

HAR-EP
1637.01

TO: COLIN C. KIPPEN, JR., DEPUTY ADMINISTRATOR
OFFICE OF HAWAIIAN AFFAIRS

FROM: THOMAS T. FUJIKAWA
HARBORS ADMINISTRATOR

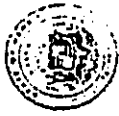
SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISP) FOR THE HAWAII COMMERCIAL HARBORS 2020 MASTER
PLAN, ISLAND OF HAWAII

Thank you for your letter dated November 29, 2000, which was addressed to our consultant, R. M. Towill Corporation, regarding the above-referenced EISP.

With regard to the requirement to provide a cultural impacts assessment as mandated by Act 50, Session Laws of Hawaii 2000, the DEIS will include a section entitled ARCHAEOLOGICAL, HISTORICAL AND CULTURAL RESOURCES in which traditional cultural practices will be addressed for each harbor. This will include an overview of the cultural history of the pertinent ahupua'a as well as summaries of interviews conducted with informants familiar with cultural practices in the ahupua'a associated with each harbor.

Specifically for Hilo Harbor, we commissioned the *Archaeological Inventory Survey, Hilo Harbor Expansion* by Haun & Associates during the DEIS preparation. This document presents the historical and cultural background of the Waiakea region of the Island of Hawaii as well as findings and recommendations. We supplemented information about cultural practices in the Hilo area with an extensive oral history interview with John Moses, a native Hawaiian and 44-year Hilo Harbor employee.

Kawaihae Harbor is located on dredged coral fill and is therefore a highly disturbed area with no archaeological sites. However, Kawaihae Harbor is near significant archaeological resources. The neighboring Pelekane lands form a buffer between the harbor and the Puukohola Heiau National Historic Site. Under the 2020 Master Plan, this buffer is retained. In addition,



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

LAND DIVISION
PO BOX 437
HONOLULU, HAWAII 96809

December 6, 2000

LD/NAV

R. M. Towill Corporation
Mr. Chester Koga, AICP
420 Waiakamilo Road
Honolulu, Hawaii 96817-4941

Dear Mr. Koga:

SUBJECT: Review Environmental Notice for Hawaii Commercial Harbor 2020 Master Plan

Thank you for the opportunity to review the subject matter. The following is our Hawaii District Land Office comments:

1. The development and construction of the new pier in Hilo Harbor needs to take into consideration a 50-foot abandoned right-of-way that parallels the existing road servicing the leasehold home-sites referred to on Page 29. Is the Roadway right-of-way going to be incorporated into the lands for the Harbor?
2. There has been some discussion about the use of the railroad right-of-way as a pedestrian route to the Banyan Drive resort area. If so, the master plan should address that possibility and the need to design a transition from the passenger terminal to the pedestrian walkway.
3. The existing roadway along the leasehold home-sites is maintained and owned by the County of Hawaii. Any intent to incorporate this right-of-way area into the harbor will require a quitclaim deed from the County of Hawaii to the State of Hawaii for set aside to DOT.
4. The road right-of-way from the existing Kea Street is a government right-of-way owned by the County of Hawaii. Again, if it is the intent to develop this as an access to the harbor, the County of Hawaii would need to quitclaim the right-of-way to the State for set aside to the DOT.

The department has no other comment to offer at this time.

Should you have any questions, please feel free to contact Mr. Harry Yada of our Land Division Hawaii District Land Office at 1-808-974-6203 or Nicholas A. Vaccaro of our Land Division Support Services Branch at 808-587-0438.

Very truly yours,

ALAN Y. UCHIDA
Administrator

C: Hawaii District Land Office

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
PO BOX 437
HONOLULU, HAWAII 96809

Ref.: 2020HMP-RCH

BENJAMIN J. CAVETANO
GOVERNOR



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

BRIAN K. AMANU
DIRECTOR
DEPUTY DIRECTORS
GLENN M. OKAMOTO
JADWIE Y. URASAKI

WEEKLY REPORT TO

Dean Uchida
Page 2
February 7, 2001

HAR-EP
1651.01

Street is not under consideration as an access to Hilo Harbor under the *Hawaii Commercial Harbors 2020 Master Plan*. Access to the proposed Piers 4, 5, and 6 is planned via Kumau Street (highlighted in green).

We look forward to your review of the DEIS. If you have any questions or require additional information, please contact Glenn Soma, Harbors Division Planner, at 587-2503.

Att.

c: R. M. Towill Corporation (Gail Atwater)

bc: HAR-E, -H

GADW:sd

HAR-EP
1651.01

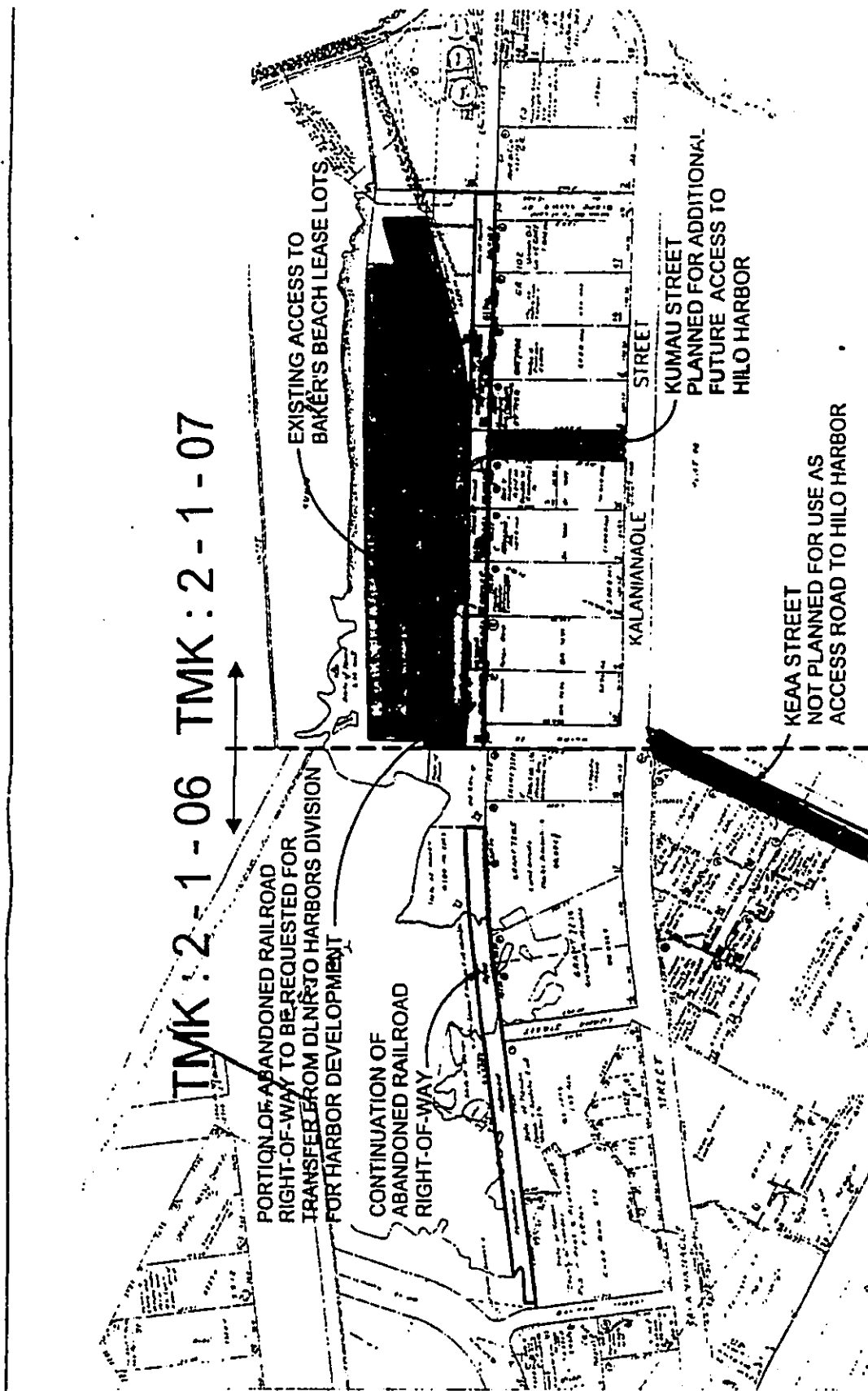
TO: DEAN UCHIDA, ADMINISTRATOR
LAND MANAGEMENT DIVISION
DEPARTMENT OF LAND AND NATURAL RESOURCES

FROM: THOMAS T. FUJIKAWA
HARBORS ADMINISTRATOR

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISP/N) FOR THE HAWAII COMMERCIAL HARBORS 2020 MASTER
PLAN, ISLAND OF HAWAII

Thank you for your letter dated December 6, 2000 addressed to our consultant, R. M. Towill Corporation, providing comments on the above-referenced EISP/N. In response to your remarks regarding right-of-way issues at Hilo Harbor, we offer the following information. Please refer to Figure 1, attached, for the locations of the areas under discussion.

1. In regard to the 50-foot abandoned right-of-way that parallels the Banyan Road servicing Baker's Beach lease lots (highlighted in yellow in Figure 1), the possibility of providing a pedestrian walkway along this right-of-way could be discussed in the future when Harbors Division requests the transfer of the Baker's Beach lease lots from the Department of Land and Natural Resources (DLNR) to enable the construction of proposed Piers 5 and 6.
2. Concerning Baker's Beach lease lots and the Banyan Drive access road (highlighted in blue), Harbors Division will have to request the transfer of this land from DLNR to enable construction of the proposed Piers 5 and 6 passenger terminal.
3. Regarding Harbors Division's intent to develop the right-of-way along Kea Street owned by the County of Hawaii as an access to the harbor (highlighted in green), Kea



R. M. POWELL CORPORATION		EISPN Comment Letter : D. Uchida, DLNR Land Division to C. Koga, RMTC, 12/6/00	
		TMK Locations of Letter Items #1 - #4	Figure 1

Dec 07 00 10:01a

State of Hawaii - DEQC

(808) 586-4186

P-1

37 00 10:02a

State of Hawaii - DEQC

(808) 586-4186

P.2

INJAMIN J. CAYETANO



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

314 SOUTH KALANIAN'OLE STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4186
FACSIMILE (808) 586-4186

GENEVIEVE SALMONSON
DIRECTOR

Kazu Hayashida
December 7, 2000
Page 2

December 7, 2000

Kazu Hayashida
Department of Transportation
Harbors Division
79 S. Nimitz Highway
Honolulu, HI 96817

Attn: Glenn Soma

Dear Mr. Hayashida

Subject: Environmental Impact Statement (EIS) Preparation Notice
Hawaii Commercial Harbors 2020 Master Plan

Please include the following in the draft EIS:

1. Acronyms list: Such a list will make it easier for the reviewer. Section 7.5, for example, contains NRCS, HAVO and HT&T. Terms such as these should be spelled out in the text and included in an acronym list.
2. Master plan users groups input: Include a description of the group sessions, how often they met and over what period of time, and the issues that were discussed.
3. Maps: Include neighborhood or area maps, with the project sites noted, in addition to those already provided.
4. Project costs: Disclosure of expenditure of state funds, including federal funds flowing through the state, is required by law. If exact amounts are not known, give a potential range of expenditures.
5. Cultural impacts assessment: Act 50 was passed by the Legislature in April of 2000. This mandates an assessment of impacts to local cultural practices by the proposed project. In the final EIS include such an assessment. For assistance in the preparation refer to our Guidelines for Assessing Cultural Impacts. Contact our office for a paper copy or go to our homepage at <http://www.state.hi.us/health/eqc/index.html>. You will also find the text of Act 50 linked to this section of our homepage.

6. Contacts: In the draft EIS be sure to document all contacts made during the entire EIS process, including the pre-consultation phase, and enclose copies of any correspondence.

7. Noise impacts: Include a copy of the 1991 study (or pertinent sections) done by Ebisu to support your discussion on noise impacts.

If you have any questions call Nancy Heinrich at 586-4185.

Sincerely,

Genevieve Salmonson
GENEVIEVE SALMONSON
Director

c: Chester Koga

February 9, 2001

TO: GENEVIEVE SALMONSON, DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
DEPARTMENT OF HEALTH

FROM: BRIAN K. MINA *Brian Mina*
DIRECTOR OF TRANSPORTATION

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISP/N) FOR THE HAWAII COMMERCIAL HARBORS 2020 MASTER
PLAN, ISLAND OF HAWAII

Thank you for your letter dated December 7, 2000, providing comments on the above-referenced EISP/N. We offer the following responses:

1. Regarding the addition of an acronym list, the Draft Environmental Impact Statement (DEIS) will provide such a list for the understanding of the reader (attached.)
2. With regard to providing a description of the user groups input, the DEIS will include a summary of the proceedings. The summary will include: a list of user group representatives, meeting dates and locations, synopsis of main points discussed, user groups organization chart, user groups work flow diagram, and Governor and industry approval of the *Hawaii Commercial Harbors 2020 Master Plan*.
3. Concerning the inclusion of additional maps, the DEIS will include neighborhood maps, with the project sites noted, in addition to those already provided in the EISP/N.
4. On the topic of the disclosure of expenditure of government resources, the Department of Transportation, Harbors Division has provided to our consultant, R. M. Towill Corporation, estimated costs for proposed improvements at the Hilo and Kawaihae Harbors in the form of a probable range of expenditures. These will be included in the DEIS.
5. With regard to the requirement to provide a cultural impacts assessment as mandated by Act 50, Session Laws of Hawaii 2000, the DEIS will include a section entitled ARCHAEOLOGICAL, HISTORICAL, AND CULTURAL RESOURCES in which traditional cultural practices will be addressed for each harbor. This will include an

overview of the cultural history of the pertinent ahupua'a as well as summaries of interviews conducted with informants familiar with cultural practices in the ahupua'a associated with each harbor.

Specifically for Hilo Harbor, we commissioned the *Archaeological Inventory Survey, Hilo Harbor Expansion* by Haun & Associates during the DEIS preparation. This document presents the historical and cultural background of the Waiakea region of the Island of Hawaii as well as findings and recommendations. We supplemented information about cultural practices in the Hilo area with an extensive oral history interview with John Moses, a native Hawaiian and 44-year Hilo Harbor employee.

Kawaihae Harbor is located on dredged coral fill and is therefore a highly disturbed area with no archaeological sites. However, Kawaihae Harbor is near significant archaeological resources. The neighboring Yelekane lands form a buffer between the harbor and the Puukohola Heiau National Historic Site. Under the 2020 Master Plan, this buffer is retained. In addition, extensive oral histories with long-time Kawaihae residents were taken in preparation of the Cultural Survey Hawaii's report *Archaeological Survey and Testing, Kawaihae, South Kohala, Hawaii*. Informants included Akau, Masaru Doi, and Eddie La'au, Jr. Further, David Kawaihae, Superintendent of the Puukohola Heiau National Historic Site, provided names of additional resources that are familiar with cultural practices in the vicinity of Kawaihae Harbor. All of these will be included in the DEIS.

6. As to the need to provide documentation of all contacts, the DEIS will contain a full list of agencies, organizations, and individuals consulted during the pre-consultation phase and DEIS preparation phase. We will also provide copies of all correspondence in the DEIS.

7. On the request to include a copy of the 1991 study done by Ebisu to support discussion on noise impacts, the DEIS will contain more recent noise analysis from a September 2000 draft report entitled *Hilo International Airport Noise Compatibility Program Report, Hilo, Hawaii* which our consultant has obtained from the Department of Transportation, Airports Division. The study area for this noise analysis encompasses the Hilo Harbor area.

We look forward to your review of the DEIS. If you have any questions or require additional information, please call Glenn Soma, Harbors Division Planner, at 587-2503.

Att.

c: R. M. Towill Corporation (Gail Atwater)

bc: HAR-E, -H

GNDW:sd

ACRONYMS LIST

		EPA	See "USEPA"
AAPA	American Association of Port Authorities	FEIS	Final Environmental Impact Statement
AAQS	Ambient Air Quality Standards	HAR	Hawaii Administrative Rules
ADA	Americans with Disabilities Act	HAVO	Hawaii Volcanoes
AECOS	The consulting firm which performed the "Review of Water Quality and Biology in Kawaihae and Hilo Harbors for the Harbors 2020 Master Plan Implementation EIS" (Appendix E)	HOISN	Hawaii Ocean Industry and Shipping News (publication)
BMP	Best Management Practices	HPD	Historic Preservation Division
BMPP	Best Management Practices Plan	HT&T	Sievelore firm providing services to Hilo Harbor
C&D	Construction and demolition, a type of "waste" material	IMO	International Maritime Organization
CFR	Code of Federal Regulations	ISTEA	Intermodal Surface and Transportation Efficiency Act of 1991
CO	Carbon monoxide	LST/LSV	Landing Ship Tank/Landing Ship Vehicle
CZM	Coastal Zone Management, referring to the Coastal Zone Management Act of 1972 (P.L. 92-583), and Chapter 205A by the same name	LOS	Level of Service (traffic engineering term)
DAR	State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources	MG-1A	Zoning code for County of Hawaii pertaining to General Industrial lands, with 1,000 square feet of land area required per building site
Dh	Decibels (measurement of sound)	MILLW	Mean Lower Low Water - level of water susceptible to flooding
Dba	A-weighted decibel, corresponding to human hearing range	MIPRSA	Marine Protection, Research and Sanctuaries Act (33 U.S.C. 1413)
DBEDT	State of Hawaii, Department of Business and Economic Development	NAGPRA	Native American Graves and Repatriation Act
DEIS	Draft Environmental Impact Statement	NCDC	National Climatic Data Center
DJNR	State of Hawaii, Department of Land and Natural Resources	NMFS	National Marine Fisheries Service
DNL	Day-Night Average Sound Level (also known as Ldn)	NPDIES	National Pollution Discharge System
DO	Dissolved oxygen	NPS	National Park Service, Department of the Interior
DOH	State of Hawaii, Department of Health	NRC	National Research Council
DOT	State of Hawaii, Department of Transportation	ODMDS	Ocean Dredged Material Disposal Sites
EIS	Environmental Impact Statement	OEQC	State of Hawaii, Department of Health, Office of Environmental Quality Control
		ORCA	Ocean Research Consulting and Analysis
		PCBs	Containing "polychlorinated biphenyls"
		pH	Measure of acidity

PM ₁₀	Measurement of particulate matter in the air
PPV	Peak particle velocity - measurement of ground vibrations
RM-1.5	Zoning code for County of Hawaii pertaining to Multi-Family Residential Districts, with 150 feet square feet of land area required per dwelling
RO/RO	Roll on/Roll off harbor facilities (see GLOSSARY OF TERMS for definition)
SEDF	Scaled energy distance factor
SHPO	State Historic Preservation Office, State of Hawaii, Department of Land and Natural Resources
SS	Precedes the name of a ship, e.g. SS Constitution, and means "Steamship"
USA	United States Army
USACE	U.S. Army Corps of Engineers
USCG	United States Coast Guard
USCS	United States Customs Service, Department of the Treasury
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service, Department of the Interior
UST	Underground Storage Tank
WQC	Water Quality Certification
YMCA	Young Men's Christian Association

420 Waikamilo Road
Suite 411
Honolulu, Hawaii 96817-0911
Telephone 808 842 1133
Fax 808 842 1937
email rmt@towillcorp.com



R. M. TOWILL CORPORATION
SINCE 1910

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Construction Management

BOLIVIANO J. CAYTANO
GOVERNOR OF HAWAII



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
Kalahele Building, Room 555
601 Kalia Road
Honolulu, Hawaii 96813

HABERT GEORGE AGAR, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
HAWAII STATE PROJECT MANAGEMENT

DEPUTIES
JANET E. LAWRENCE
LIMELI WISPOKA

AIC RESOURCES
ARCHAEOLOGICAL SURVEY
INTERVIEW AND RESOURCES
INTERVIEW
ENVIRONMENTAL
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND
STATE PARKS
STATE PROJECT MANAGEMENT

LOG NO: 2697
DOC NO: 0101RC20

January 30, 2001

Mr. Chester Koga, Project Manager
R.M. Towill Corporation
420 Waikamilo Road, Suite 411
Honolulu, Hawaii 96817-0911

Dear Mr. Koga:

SUBJECT: Review of Archaeological Inventory Survey - Hilo Harbor
Facilities Expansion, Waialae, South Hilo, Hawaii
TMK: 2-1-07: 20-37; 2-1-09; 2-12-41, 42

This letter reviews this survey report which was received by our staff on December 15, 2000 (Haun & Henry 2000, Archaeological Inventory Survey, Hilo Harbor Facilities Expansion ... Haun & Associates ms.).

Dear Dr. Cordy:

Please find enclosed the subject report prepared by Haun & Associates in October 2000. The report was generated to support the Environmental Impact Statement for the Hawaii Commercial Harbors 2020 Master Plan which is currently being prepared.

Please review the enclosed report and provide comments by January 15, 2001. We appreciate your input on this important study.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

cc: Gail W. Atwater, AICP, R.M. Towill Corporation
Glenn Soma, DOT-Harbors
Alan Haun, Ph.D

The report acceptably summarizes the ahupua'a and project area settlement patterns. Few, if any, traditional Hawaiian sites were expected, given extensive land alteration due to harbor and breakerwater construction.

The survey adequately covered the undeveloped portions of the parcels, finding 1 historic site (the slab foundations of an early 20th century structure). Soil is virtually non-existent in the parcels, and extensive land disturbance has indeed occurred.

We agree with the significance evaluation of the one site, significant solely for its information content (Criterion D of the Hawaii Register of Historic Places).

We also agree that a reasonable and adequate amount of that significant information was recorded during the survey and, therefore, no further mitigation work at the site is needed. The site needs no further protection.

The report is acceptable, and the historic preservation review process is completed. Development will have "no effect" on significant historic sites.

Aloha,

[Signature]
DON HIBBARD, Administrator
State Historic Preservation Division

cc: Alan Haun, Haun & Associates
Planning Dept., County of Hawaii



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Region
300 Ala Moana Boulevard, Room 3-122
Box 50088
Honolulu, Hawaii 96850

In reply refer to: KHF

DEC 13

Chester T. Koga, AICP
R.M. Towill Corporation
420 Waiakamilo Road
Honolulu, Hawaii 96817-4941

Re: Environmental Impact Statement Preparation Notice for the Hawaii Commercial Harbors
2020 Master Plan - Island of Hawaii, State of Hawaii

Dear Mr. Koga:

The U.S. Fish and Wildlife Service (Service) has reviewed the above referenced Environmental Impact Statement Preparation Notice (EISP/N). The EISP/N was prepared by R.M. Towill Corporation, for the project sponsor, the State of Hawaii, Department of Transportation. The proposed project involves improving the facilities at Hilo and Kawaihae Harbors, Hawaii. This letter has been prepared under the authority of and in accordance with provisions of the National Environmental Policy Act of 1969 [42 U.S.C. 4321 *et seq.*; 83 Stat. 852], as amended, the Fish and Wildlife Coordination Act of 1934 [16 U.S.C. 661 *et seq.*; 48 Stat. 401], as amended, the Endangered Species Act of 1973 [16 U.S.C. 1531 *et seq.*; 87 Stat. 884], and other authorities mandating Service concern for environmental values. Based on these authorities, the Service offers the following comments for your consideration.

Improvements at Hilo Harbor include the development of a dry bulk cargo staging area; interisland cargo terminal at pier 4; overseas container terminal at pier 1; passenger terminal at pier 5; ocean research facility at pier 6; berths for commercial fishing vessels, US Coast Guard vessels, visiting and research vessels; two additional access roadways; and dredging berths for piers 3, 4, 5 and 6. Improvements at Kawaihae Harbor include the development of a liquid bulk cargo terminal; dry bulk terminals at pier 1; overseas container terminal at pier 2A; interisland cargo terminal at piers 3 and 4; passenger terminal or research station at pier 2B; military cargo terminal at pier 3; access road improvements; and dredging berths for piers 1, 2A, 2B, 3, 4, and 5. Construction-related activities will occur in or near the marine environment for each of the proposed projects.

The Service recommends that the Draft Environmental Impact Statement (DEIS) discuss the ecological impacts of the proposed Hilo Harbor and Kawaihae Harbor improvements for each of the alternatives under consideration. Particular attention should be given to addressing potential impacts to endangered and threatened species, coral-reef ecosystems, wetlands, migratory birds, rare native species and their habitats. Also, the DEIS should discuss plans to avoid or minimize

impacts to fish and wildlife resources. In circumstances where short-term or permanent impacts to fish and wildlife resources are unavoidable, the DEIS should discuss appropriate mitigation for each proposed action.

The Service is concerned that corals located in the vicinity of the project areas may be impacted as a result of the suspension of fine sediments in the water column due to project-related dredging activities. Suspended sediments can abrade and smother coral and algae in the nearshore environment. The Service recommends that Best Management Practices be incorporated into the project to minimize the project-related degradation of water quality and impacts to fish and wildlife resources and habitats, including coral-reef ecosystems. These measures should be fully described in the DEIS.

Finally, the Service is concerned that the introduction of marine alien species, by increased vessel traffic at Hilo Harbor and Kawaihae Harbor, may impact nearshore marine ecosystems by displacing Hawaiian marine species. Introduced species represent a major threat to the perpetuation of native marine plants and animals. The DEIS should include a detailed discussion of how the control of marine alien species introductions will be accomplished within the anticipated increase in vessel traffic at the harbors. The Service also recommends that the Hawaii Division of Aquatic Resources (DAR) be contacted regarding the prevention of marine alien species introductions to the State of Hawaii.

The Service appreciates the opportunity to comment on the EISP/N and we look forward to reviewing the DEIS when it becomes available. If you have any questions regarding these comments, please contact Fish and Wildlife Biologist Kevin Foster by telephone at (808) 541-3441 or by facsimile transmission at (808) 541-3470.

Sincerely,

Paul Henson
for Paul Henson

Field Supervisor
Ecological Services

cc: NMFS-PJAO, Honolulu
USEPA-Region IX, Honolulu
DLNR, Hawaii
DAR, Hawaii
CZMP, Hawaii
CWB, Hawaii

BENJAMIN J. CAVETANO
GOVERNOR



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

BRIAN K. MINAHI
DIRECTOR
DEPUTY DIRECTORS
GLENN H. SOMA
JANET T. URASAWA

IN REPLY REFER TO
HAR-EP
1604.01

Mr. Paul Henson
Page 2
January 23, 2001

HAR-EP
1604.01

We look forward to your review of the DEIS. If you have any questions or require additional information, please contact Mr. Glenn Soma, Harbors Division Planner, at 587-2503.

January 23, 2001

Mr. Paul Henson
Field Supervisor, Ecological Services
U.S. Department of the Interior, Fish and Wildlife Service
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

Thomas T. Fujikawa
Harbors Administrator

cc: HAR-E, HAR-H

GA/DW:lm

Very truly yours,

Subject: Environmental Impact Statement Preparation Notice (EISPN) for the
Hawaii Commercial Harbors 2020 Master Plan, Island of Hawaii

Thank you for your letter dated December 13, 2000, which was addressed to our consultant, R. M. Towill Corporation, providing comments on the above-referenced EISPN. In response to your remarks, we have the following information.

1. Regarding the need to address ecological impacts of the proposed Hilo Harbor and Kawaihae Harbor improvements for each of the alternatives under consideration, marine biological and botanical surveys were conducted at each harbor during the Draft Environmental Impact Statement (DEIS) preparation. Biological experts indicate that the subject harbors are not a habitat for endangered or threatened animals or plants. Findings will be included in the DEIS. Further, the DEIS will include discussion of how any short- or long-term impacts on identified biological resources will be avoided or minimized as well as any mitigation measures that will be necessary.
2. With reference to addressing the impacts that the various improvements will have on coral in the two subject harbors, the DEIS will include discussion on the short- and long-term effects of the proposed construction projects on coral. Further, mitigation measures and Best Management Practices will also be described.
3. On the subject of addressing the introduction of marine alien species due to increased vessel traffic at Hilo Harbor and Kawaihae Harbor, the DEIS will include detailed discussion of the methods for controlling alien species. Also, as suggested, we will consult with the Department of Land and Natural Resources, Division of Aquatic Resources, regarding the prevention of alien species introductions from foreign ships at the two subject harbors.

Momi Subiono
HC-1 #16
Captain Cook, Hawaii 96704
1-808-328-8939

R.M. Towhill Corporation
420 Waiakamilo Road, suite 411
Honolulu, Hawaii 96817
RMTC Reference No. 1-18844-0E

Aloha, Mr. Kolga, Call Atwater, Brian Takeita,

I'm writing to you in regards to the 2020 Master Plan for Hawaii Commercial Harbors. I have a copy of the Environmental Impact Statement and have been studying it and found several discrepancies in it and I would like you to make arrangements to correct them.

First, on page 25 (3.11), it states that, "Kawahae Harbor. There are no known rare, threatened or endangered species on the project site. Doves and cardinals have been observed (Personal communication, Winona Char, Botanical Surveyor, 2000). This statement is false because there is a species of shell that is at risk of going extinct because of the extra gas and oil that will be emitted into the revised harbor at Kawahae. Thus, affecting the water quality. These shells cannot survive the extra pollution created from bigger boats coming into the shoreline. Obviously Winona Char is a Botanical Surveyor and knows nothing about fauna of the sea. I urge you to do another study on this. The cultural significance of these shells is important to Hawaiian people and the stewardship of the ecosystem of our island and this project will stop us from doing so. These shells are only found in the waters of Kawahae small boat harbor and are not found on any other beach. Therefore, the species from this island will go extinct if this project is continued. Our right to gather them cannot be taken away due to the greed of the States Department of Transportation.

Second on page 27 (3.15) "Land Use and Ownership. Existing land uses are discussed above in Section 2.2 Both harbors are owned by the State of Hawaii. The harbors are located on ceded lands."

I find it horrifying to find that ceded lands are being used by the state and Hawaiian people's right to gather from our ceded lands are being relinquished. I find this another case of what is being done with stolen land.

Third, (On page 12) the use of Pua Kallima o Kawahae will be relinquished according to Figure 5 (See map). I do not see an area where Pua Kallima o Kawahae will be able to use. Which tells me that you plan

to keep the Community out of the area.

Fourth, on the same page The area known as the Pelicane Lands is within the harbor boundary but has been excluded from action under the 2020 Master Plan. This area is used as a coral stockpile and serves as a buffer area to the nearby Pu'u Kohola National Historic Site, and adjacent land use. Also nearby the harbor property is the submerged Hale O Kapuni historic area.

On figure 5 (see map) your map shows that the Pelicane Lands will be used as a Liquid bulk terminal, Interisland cargo terminal, and military cargo. I do not see it as a buffer leaving the National Historic Park of Pu'u Kohola open to damage due to extra development of the harbors and increased activities in the area.

I find your Environmental Impact Statement incorrect, and I am demanding that you do more research on the shells and the impact of our islands ecosystem that this project will create.

Sincerely,

Momi Subiono

Momi Subiono
Teacher of Hawaiian Studies
and concerned citizen.
HC-1 #16
Captain Cook, Hawaii
96704
1-808-328-8939

BENJAMIN J. CAYENANO
GOVERNOR



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

BRIAN K. MINAII
DIRECTOR
DEPUTY DIRECTORS
GLENN M. SOMA
JACQUELYN DUNN

WHERE TO
HAR-EP
1532.01

January 11, 2001

Ms. Momi Subiono
HIC-1, No. 16
Captain Cook, Hawaii 96704

Dear Ms. Subiono:

Subject: Hawaii Commercial Harbors 2020 Master Plan
Environmental Impact Statement (EIS), II. C. 5326

Thank you for your letter requesting our correction of several discrepancies in the subject EIS.

By copy of this letter, we are instructing our consultant, R. M. Towill Corporation, to investigate your concerns and provide a more detailed response.

Please contact Mr. Glenn Soma, Harbors Division Planner, in Honolulu at (808) 587-2503 if you have any questions.

Very truly yours,

Brian Minaai

BRIAN K. MINAII
Director-Designate of Transportation

c: Ms. Gail Atwater
R. M. Towill Corporation (with copy of incoming letter)

(1)

01.0778

D12-83

(2)

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION

Momi Subiono
89-709 Lanikona Road, 22 | 55 Pili '01
Captain Cook, Hawaii
96704

(808) 328-8939

T. S. Henry

State Of Hawaii
Department Of Transportation
869 Punchbowl St.
Honolulu, Hawaii
96813-8097

January 18, 2001

Dear Mr. Mimaal, Mr. Soma,

I am again writing to you in regards to the Proposed big boat harbor at Kaulahe. I am glad that you are going to do more studies on the ocean life on the area but I am writing to you in regards to the cultural significance and the population explosion that the Kaulahe small boat harbor will create.

The art of shell making in Hawaii is very important to our island lifestyle and we don't want you to make the harbor any bigger than it is. We want to save the ecosystem of our whole Kona, Kohala coastline. I know people who have been gathering this precious resource in the area for 30 years and before the harbor was created, people have been collecting these shells from the first beach which was destroyed.

I have observed children learning how to swim and surf in the area also. Are you going to take the beach away from them also? The hotels have taken over the other beaches and you have to walk very far to get to those beaches since they have put up gates and limited parking in the areas.

You say that it's for the good of all the people of this island and I think to differ. How about letting us support our own businesses instead of relying on imported goods instead of buying our own products.

Here are some reasons for me not wanting the harbor developed.

1.) Population explosion on the island will be encouraged by the harbor, and the "developments" the harbor will support. (in fact, land development is land spolage). We have already seen what happened to the ecosystem of the area right below Pu'ukohola heiau. The extra slit on the coral beds killed all the coral in the area. (Have your oceanographer check that out).

2.) The new jobs will not go to the present residents of Hawaii. The new positions will be filled largely by employees of the large corporations which they will import from elsewhere.

3.) Contrary to what Mr. Soma thinks....The new housing and new towns will drive up property values and property taxes to levels which will make it impossible for most individuals to continue to live in their present homes. They will not be able to afford the higher taxes and higher prices. This pattern has occurred many times elsewhere. Examples, Vail and Aspen, Colorado, O'ahu.

4.) The quality of life in Hawaii will be rapidly degraded by the new highways, housing developments, industrial facilities, that will come from the development encouraged by the new harbor. I am from Kona and I don't want this island to become another O'ahu. Glen you say you live in Paradise? Look out your office window. What do you see? Mountains or buildings towering above your head. You can barely see mountains!

5.) The harbor will help large corporations become richer. It will "not" help Hawaii. In fact, it will generate more havoc in the area.

6.) This project will harm the Hawaiian people who gather and use the area for fishing (all the fish will die and become inundated by the extra pollution.) You have already stole the land, don't take our right to gather that we have exercised in the area for centuries.

7.) There are no other places where the local people can go for beach recreation since Spencer Park is overcrowded and the water polluted by all that sunscreen that the foreigners wear in the water.

8.) The Hotels have taken over the other beaches and have made it very hard for people to get to unless you are guest of their hotels.

9.) The ceded lands should have never been stolen from the Hawaiian people and now our cultural rights to gather from the area are once again being taken away.

I'm very interested in finding out how you can stop this all from happening and still build the harbor. So I am urging you all to stop this development now.

Sincerely, Momi Subiono.

Momi Subiono



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

BRIAN K. MINAMI
DIRECTOR
DEPUTY DIRECTORS
GLENN M. OKAMOTO
JANET Y. UHAKAHI

IN REPLY REFER TO
HAR-EP
1679.01

Ms. Momi Subiono
Page 2.
February 22, 2001

HAR-EP
1679.01

Pelekane lands. Further, the DEIS will cover any potential impacts of the proposed improvements on nearby archaeological resources.

5. In reference to further research on shells and the impact on the islands ecosystem - the impacts of proposed harbor improvements will be disclosed in the DEIS along with proposed mitigation measures to reduce or eliminate the short- and long-term impacts.

The following addresses the comments in your second letter:

1. In regard to your concern that Kawaihae Harbor will increase the population in the surrounding area, the DEIS will address population projections for west Hawaii and the growing population's need for additional commercial harbor facilities.
2. You expressed concern that new jobs will not go to the local residents - please be advised that all Harbors Division employees will be hired in accordance with State of Hawaii equal employment opportunity hiring procedures. The Harbors Division does not interfere with or dictate the hiring practices of private firms.
3. About your concerns that new housing and new towns will increase property values and subsequent property taxes - the DEIS will contain information on projected population growth and real estate trends in west Hawaii and their relationship to harbor development.
4. About your concern on the loss of gathering rights - the DEIS will include a section that discusses traditional cultural practices, including traditional gathering activities at the two commercial harbors.
5. The matter of hotels and access issues should be discussed with the hotels involved.
6. About your concern that harbor property is located on ceded lands - the use of such lands by the State will be discussed in the DEIS.

If there are any questions or concerns in this matter, please call Mr. Glenn Soma, Harbors Division Planner, at 587-2503

Very truly yours,

Brian K. Minami
BRIAN K. MINAMI
Director of Transportation

c: Gail Atwater, R. M. Towill Corporation

Ms. Momi Subiono
HC-1 #16
Captain Cook, Hawaii 96704

February 22, 2001

Dear Ms. Subiono:

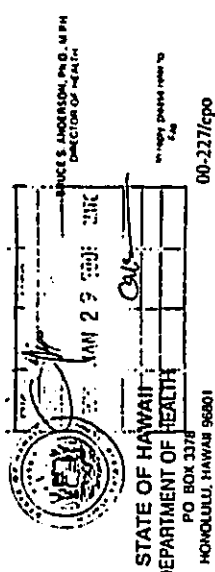
Subject: Environmental Impact Statement Preparation Notice (EISPN) for the Hawaii Commercial Harbors 2030 Master Plan, Island of Hawaii

Thank you for your letters dated November 29, 2000 and January 18, 2001, providing comments on the subject EISPN.

The following addresses the comments in your first letter:

1. Regarding your comment that questions the validity of a statement contained on page 25 of the EISPN that reads, "there are no known rare, threatened or endangered species on the project site" - botanical and marine biology surveys were conducted and will be discussed in the Draft Environmental Impact Statement (DEIS). The shells you speak of finding on the coral stockpile will also be addressed in the DEIS.
2. About your concern over the loss of gathering rights and the use of ceded lands - the DEIS will include a section that discusses traditional cultural practices, including traditional gathering activities at the two harbor sites. The DEIS will review cultural histories of the pertinent ahupua'a and provide summaries of oral histories. Further, the DEIS will include discussions of the use of ceded lands by the State.
3. Concerning the Pua Kailima O Kawaihae recreational, educational, and cultural ocean activities site in Kawaihae Commercial Harbor - the State of Hawaii and Pua Kailima Cultural Surf Park, Inc. entered into a five-year cooperative agreement on December 31, 1997 that permits this nonexclusive use of Kawaihae Commercial Harbor land. Should Pua Kailima Cultural Surf Park, Inc. desire to renew this agreement, we will re-evaluate the safety considerations of mixing recreational activities with heavy industrial operations at such a time. We always strive to minimize any accidents to visitors of our commercial harbors. Safety is a primary operational concern.
4. You expressed concern over the adverse effects of the proposed harbor improvements on Pelekane lands. The DEIS will discuss the proposed improvements in relation to the

Mr. Chester T. Koga
January 19, 2001
Page 2



Mr. Chester T. Koga, AICP
R.M. Towill Corporation
420 Waikamilo Road
Honolulu, Hawaii 96817-4941

Dear Mr. Koga:

Subject: Environmental Impact Statement Preparation Notice (EISP/N)
Hawaii Commercial Harbors 2020 Master Plan
Island of Hawaii

Thank you for allowing us to review and comment on the subject document. We would like to see the following items addressed in the Draft EIS:

1. The control of fugitive dust during construction activities.
For questions concerning fugitive dust, please contact Mr. Ed Yamamoto of the Clean Air Branch in Hilo at (808) 933-0401 and Mr. Steven Okaji of the Clean Air Branch in Kona at (808) 322-1507.
2. The control of noise during construction activities.
Should there be any questions on this matter, please call Russell S. Takata, Program Manager, Noise, Radiation and Indoor Air Quality Branch at 586-1701.
3. Water Pollution
 - a. The Army Corps of Engineers should be contacted to identify whether a Federal permit (including a Department of Army permit) is required for this project. If it is determined that a Federal permit is required for the subject project, then a Section 401 Water Quality Certification would also be required from our office.
 - b. If the project involves any of the following discharges into State waters, National Pollutant Discharge Elimination System (NPDES) general permit is required for each activity:

- 1) Storm water runoff associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than five (5) acres of total land area (equal to or greater than one acre after March 10, 2003).
- 2) Hydrotreating water, and
- 3) Construction dewatering effluent.
- 4) The Department requires that Notices of Intent (NOI) for NPDES general permits be submitted thirty days before the discharge is to occur. NOI can be picked up at our office or downloaded from our website at <http://www.state.hi.us/doh/eh/cwb/forms/index.html>.

Should you have any questions on this matter, please contact Kris Poemlis, Engineering Section of the Clean Water Branch, at 586-4309.

Sincerely,

GARY GILL
Deputy Director
Environmental Health Administration

c: CWB
NR&IAQB
CAB

420 Wai'anae Road
Suite 411
Honolulu, Hawaii 96817-8011
Telephone 908 942 1133
Fax 908 942 1937
email: info@rmtowill.com



R. M. TOWILL CORPORATION
SINCE 1910

Planning
Engineering
Environmental Science
Program Management
Surveying
Construction Management

February 23, 2001

Mr. Gary Gill, Deputy Director
Environmental Health Administration
Department of Health
Post Office Box 3378
Honolulu, Hawaii 96817-4941

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISP/N) FOR THE HAWAII COMMERCIAL HARBORS 2020
MASTER PLAN, ISLAND OF HAWAII
File 00-227/epo

Dear Mr. Gill:

Thank you for your letter dated January 19 providing comments on the above-referenced EISP/N.

With regard to the control of fugitive dust during construction activities, the Draft Environmental Impact Statement (DEIS) will include information on control measures. Mr. Ed Yamamoto and Mr. Steven Okaji of your staff provided consultation with regard to the DEIS discussion of fugitive dust control measures for the subject harbors.

Concerning noise during construction activities, we contacted Mr. Russell Takata of your staff to review mitigation measures in the DEIS regarding noise during construction. The DEIS will address restrictions on the hours in which construction can occur, as well as the requirement for a Community Noise Variance if construction is to occur beyond the established hours.

With regard to water pollution, the DEIS will include information about permits that may be required, including Department of the Army permits, Section 401 Water Quality Certification and National Pollutant Discharge Elimination System (NPDES) permits.

With regard to the requirement for Notice of Intent for NPDES, the Department of Transportation will comply with notice requirements prior to any construction-related discharge.

We look forward to your review of the DEIS. If you have any questions or require additional information, please contact Gail Atwater, AICP at R.M. Towill Corporation, 842-1133 or Glenn Soma, Harbors Planner at the Department of Transportation, Harbors Division, 587-2503.

Very truly yours,

Gail Atwater
Gail Atwater
Chester T. Koga, AICP
Project Manager

C: Department of Transportation, Harbors Division (Glenn Soma)

Appendix A-2

DEIS COMMENT LETTERS AND RESPONSES

**LIST OF PERSONS, ORGANIZATIONS
AND PUBLIC AGENCIES COMMENTING ON THE DRAFT EIS**

1	<i>Momi Subiono (11 letters and 1 email)</i>
2	<i>State of Hawaii, Department of Accounting and General Services</i>
3	<i>Liz DeRoche</i>
4	<i>Jesse Wolf</i>
5	<i>KIAA, Inc.</i>
6	<i>Elfriede Wilkins</i>
7	<i>State of Hawaii, Department of Defense</i>
8	<i>County of Hawaii, Department of Public Works</i>
9	<i>State of Hawaii, Department of Health</i>
10	<i>Dnitra Ayers</i>
11	<i>Robina Nalani Subiono</i>
12	<i>State of Hawaii, Office of Environmental Quality Control</i>
13	<i>Josephine Keliipio</i>
14	<i>U.S. Department of the Interior, Fish and Wildlife Service</i>
15	<i>State of Hawaii, Department of Hawaiian Home Lands</i>
16	<i>Department of the Army, U.S. Army Engineer District, Honolulu</i>
17	<i>University of Hawaii, Environmental Center</i>

**PERSONS WHO SIGNED PETITIONS REGARDING
KAWAIHAE HARBOR**

Thomas Oden
 Kyle Rogers
 Wally Tavares
 Nicole Montalvo
 Paul Maciaz
 Sam McFadden
 Jeannine Williams
 Chris Arunda
 Cora Rillero
 Mel Bahasa
 Monique Edwards
 Ray Strauss
 Mark Ayers
 Bullet Obra
 Renee Balanga
 Nui Balanga
 Alani Balanga
 Ming Balanga
 Donald Bois
 Melissa Kaupiko
 Tennille Howard
 Nikki Howard
 Arthur Howard
 Shantel Abong
 Shila Abong
 Ron Cuber
 Christopher Young
 Islia Young
 Cameron Young
 Jun Balanga
 Jayme Leslie
 Edsen Walker
 Jaron Abran
 Barry Keller
 Dennis McKenna
 Buff Willard
 Boupy Campbell
 Cindy Oswald
 Rick Johnston
 Rosemary Alles
 Patricia Owen
 Jonathan Kug
 Kaiki Gunderson
 Nohea Masaoka
 Aurora Ministero

Peter Ministero
 Grant Tiganger
 Lloyd Kenny
 David Kaahiwihiwi
 Arthur Enriques
 Doug Ing
 Dolores LaMadrid-Ahu
 Eric Ahu
 Myron Guerrero
 Jarrett Enriques
 Shellie Labrados
 Tasha Nihau-Lindsay
 Garren Lindsay
 Isaiah Lindsay
 Betsy Lindsay
 Kili Beall
 Kahea Wakinekona
 Ezekiel Wakinekona
 Scott Pratson
 Gale Stinnett
 Jayne Heinze
 Alfred Lopez
 Robyn Pescaia
 Holly Crane
 Iko Baluya
 John Marram
 Ed Crane
 Robin Williams
 Sydette Kalau
 Maka Kalau
 Danny Maligro
 Tamiko Kaneko
 Noelle Kall
 Shawn McVeigh
 Bob Black
 Larry Davis
 Bill Madem
 Patrick Ganley
 Jeannette Martin
 Kerry Mertz
 Cheech Sarme
 Michelle Banguan
 Lynsey Martin
 Dnitra Ayers
 Barbara Cox

M. Sonohara
 Marine Pauli
 Esther Okada
 Tammy Meyer
 G. Gavanhos
 N. Kuhns
 L. English
 Austin Latimer
 Bill Cyr
 Susan Cyr
 Alex Espanida
 Conrade Mercado
 Kaipo Young
 Norman Ventura
 Meleana Aming
 Ekele Andrade
 Eva Kealamahia
 Gail Souza Save
 Elaine Loo
 Marjorie Spencer
 Segal Lace
 Mary Lindsay
 Sarah Kiho
 Earl Bell
 Jane Asing
 Doris Johnson-Purdy
 Martin Purdy
 Mahina Kahulelia
 Allen Lindsay
 Denise Murphy
 Lenette Hudgins
 Chris Puong
 Bridgett Horani
 Linda Healou
 Sharon Mayberger
 Laura Juison
 Janice Lunch
 Pua Seike
 Rochelle Dougherty
 Ellen Freitas
 Mike Funk
 Frank Funk
 Jeremy Padakea
 Jason Kong
 Gary Sizar

Ray Ledward
Mark Harry
Tamara Onek
Heidi Hemmings
Keoki Lindsay
Paulette McNerney
Carolyn Roit
Cherisse McKent
Randy Botti
Lamber Lee Lau
Abbott Galaher
Kevin Lindsay
Mark Evans
Bob Bauer
Brandon Bruce
Brice Ayau
Afa Tuaolo
Kimo Kau
Donai Dawson
Chad Kunhour
Rise Ramos
Heda Lindsay
Kenny Virgilio
Raleigh Loando
Mel Paoule
Leo Santimer
Mark Collins
John Baehr
Darren Tagama
Jim Elliott
Marjorie Santos
Gerri Lee Hong
Don Hoover
Joseph Pierson
Denise Lindsay
Beth Graves
Steve Olson
Ken Ambrosio
Maria Noaldo
Melissa Soares
Shelly Nakamura
Charmaine Alameda
Kathy Kataoka
Malia Reynolds
Michelle Peleiholani
Ethel Robertson
Star Verece
William Whitehead
Natalie Juan

Jasmine Juan
Winnie Wrixon
Jon Rosa
Ashely Morris
Kay Hansen
Lisa Panker
Liloa Papa
Ted Lindsay
George Mann
Mike Mann
Ernest Tsu
Kenneth Tsu
Kaaren Lo
Nalei and Puou Kunewa
Atwood Hooper
Pua Dawson
Bo Meileato
Robert Hoffer
Maile Hoffer
Maka Kaluna
Solomon Kaluna
R.D. Trenary
H.K. Makua
Ernest and JoAnn Reyes
M.E. Maikui
Cameron and Christina
Lopes
B. Kaimiloa Chrisman
Momi Subiono
K. Subiono
D. Subiono
Marjorie Beisto
Judith Guerto
W. Gonzalez
Noelani Harvey
Joyce Havarkato
Zac Vanderschuff
Enid Murty
Edwina Murty
Morgan James
Patrick Favors
Gary Ross
Rene Ross
Kaleo Bertelman
Penny Bertelman
Andrea Reish
Darralyn Clarke
Craig Clarke
J. Wilkins

Kurtis Yamauchi
Carol DeFazio
Carol Carroll
Terry Wallace
Mark Louis
Jon Hopcia
Carmen Waltner
Suzanne Marek
John Joaquin
Carey Lindenbaum
Mary Prevet
Craig Iwanaga
Cami Iwanaga
Deborah Wiley
Diana Wolking
Celeste Deniz
Edward Deniz
Mora Meddler
Andrea Chin
Mark Gamble
Sam Kaeo
Kilohana Domingo
Gary Garbone
Janice Lakala
R. Mitchell
Byron and Lenora Wright
Clyde Brhumaghim
Terry Canda
Shane Domingo
Aka Dooley
Jessica Medeiros
Julie Bushman-Smith
Jessie Eames
Patty Eames
Carol Farkas
Rafael Ramirez
Isaiah Bobner
Albert LaRosa
Jim Wiley
Gretchen Kelly
Danny Rounds
Kauila Ho
Linda Knapp
Nita Usherwood
Kii Morse
Colette Hirata
Kathy Sherry
Nancy Miller
Mark Miller

Loke Hochuli
Getta Patterson
H. Patterson
Raynard Mossman
Manu Hanano
Russell Haas
Bonnie Haas
Lisa Bunge
Phil Sappington
F. Fung
Gay Jensen
Linda Russell
Sue Mailander
Karen Spachner
Mark Kimball
Charles Gallison
Brian Craig
Nicolina Rinaldi
Ellen Crocker
Ryan Nelson
Marlina Lee
Leilani White
Richard Jatz
Kane Harrity
Peter Harrity
Deirdre Brott
Eve Doolan
Judy Doolan
Judy Rodman
April Burns
Jackie Finnerty
Jacquelyn Woodmanse
Dina Case
Pua Case
Leila Bertelman
Kehau Bertelman
Laua'e Sanchez
Belika Bertelman
Toni Labrador
Kyle Matsuda
Doralyn Branco
Ann Kennedy
Matt Phillips
Kaaka Swain
Kekoho Ferreira
Daniel Rick
Cheryl Kahikina
Melinda Verbear
Darren Elisaga

Marni Tavares
Claudette Feeney
Deirdre H
Frank Feeney
Deirdre Kaihana
Glen Kaihana
Branaan Omerod
Maile Oana
Jolynn Dean
Kevin Kabel
Michael McMillan
Jenny Jo Yimanishim
Lance Owens
Bob Althorn
William Pratt
Lynn Angay
Barry Takanushi
Jan Achay
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Gary McCollum
Mary Maulease
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Yvonne Sommerfield
Brennan Ayers
Colleen Wright
R. French
Tara Smith
Pete McCollum
Kathleen Kong
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Teresa Nelson
T. Kaipo
Carla Santos
B. Cazimero

Tiare Hed
Paie Close
Margie Judd
Kristen Kolsky
Kelly Stevens
Lydia Bareto
Donna Rohn
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Rebecca Schte
Colleen Sullivan
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Heidi Madisher
Jan Wilkes
Jerenette Kalahiki
Winona Watson
Helen Kurlansky
Mary Lou Tavares
Gertrude Duane
Helen Laur
Alyce Yamaguchi
Rose Spencer
Dave Douglas Kamuela
Paul Truman
Rascke Kong Ahana
G. Ahana
Kathy Broom
Carolyn Holloway
D. Holloway
Everett Knowles
J. Subiono
Charmaine Paapala

+ 33 illegible signatures.
If those petitioners'
addresses were legible,
response letters were
addressed to "Resident."

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Pupu O Kawaihae
A Hawaiian Account of
Shells of Kawaihae
&

DATE	FILE	CLASS	STATUS
FEB 27 2001	96704	96704	96704

Scientific Descriptions and Hawaiian Uses of Hawaiian shells:
I of 11 pages. Testimony of Momi Subiono a Hawaiian person
on, February 12, 2001

The following is an account from a Hawaiian point of view.
The scientific portion, is research that I have done on the shells
in an effort, to insure perpetuation of the art of shells in
Hawaii and to make aware the need for protection of them.
The need for developers and politicians, to take into
consideration the environment that we inhabit and
many times take for granted until it is too late, is the most
important matter we are faced with today. Paramount is the
ability for our island to maintain sustainability.

Examples of unhealthy development: The Island of Oahu.
Aspen, Colorado. The protection of the beauty of an area
should also be taken into consideration. The people of the
island should be able to say what development is allowed to go
on in their neighborhoods. The cultural significance of the
area is obvious. Yet, the State of Hawaii chose to pick this
sight for a new and (so called) improved harbor. Before the
LST ramp was created, people spent time along the shore of
Kawaihae. It is fair to say, that before the first development of
the area which, created the LST, small boat harbor site, shells
were found on adjacent beach right below Pu'ukohola National
Historic site. Because of this first development, the coral on
the adjacent beach from the harbor has been killed off. Shells
are not found anymore on that beach and are also not found at
Spencer Park. The shark heiau was of cultural significance
then, and it remains so, according to the Hawaiian people. The

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obstruction of the free flow of the sharks migrating in the area
from ancient times, occurred because of the first development
which created the LST ramp.

2

In the early days,
Hawaiian people lived with nature. They learned this by trial
and error. They knew how important it was to protect it, as
well as use it to the best of their ability. The kapu on certain
fishes while spawning,

tells us that the Hawaiians had scientific inquiry as well as
knowledge. It was the key
factor that allowed them to survive as a vibrant culture which
the Hawaiians of today, are very much a part of. Developers
have been allowed to bulldoze over Hawaiian bones and
desecrate areas of high cultural significance. They say for the
good of all people. Is it really for all the people? Or is it for the
good of business owners, who don't really care for the land?

I am writing this in respect to all my ancestors who were here
before and their fathers, fathers, and mothers, mothers and
anyone else who resided on these beautiful islands of Hawaii
before 1778.

Every person was allowed to move from one ahupua'a if
they chose to. The ahupua'a system cannot be used by the
State to hinder our gathering rights. The State and Private
Owners, have kept us from access to the shoreline in our own
ahupua'a. Not allowing the community to enjoy gathering and
recreational area. Are you prepared to build bigger prisons?
Development also brings more crime as well. What will our
youngsters and families do in there free time, with no
recreational area.

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3

We live in modern times and have cars, stores, and imported goods, and we all have the right to make a living. This by no way, means that we should be able to overload our islands and destroy our native belief, ways and environment. With all this in mind, I would like to start this account from the view of a Hawaiian person who loves and cares for the environment, and chooses not to allow the state to destroy the Hawaiian peoples right to gather from the land (aina). All are responsible for caring for it. I greatly "oppose" the improvements on Kawaihae harbor, because it creates population explosion, more pollution on our island, takes the right of our community to have a recreational area (the hotels have greatly hindered our access to the shoreline) and now the State of Hawai'i, continues this activity that will take from our community once again which leads to higher crime rate in the long run because the people and children will have hardly anywhere to relax and enjoy. Last, it harms the Hawaiian people and infringes on the basic human rights of native people to gather.

Family Turbinidae

These shells are nicknamed turban shells, are in a large family of globose, these whorled shells which range in height form about 50 mm to less than 1mm. The shape is similar to a top shells. A deep trench in resemblance of a turban separates the whorls. The most famous of the turban shells are easily recognized for it's cats eye door called an operculum. The type

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of cats eye door is the characteristics of all turban shells. These animals are herbivorous and feed on seaweed (limu).

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1. *Leptothyra verruca* (Gould 1845) This turban shell, about 5mm in diameter and 5 mm in height, is faintly spirally sculptured and variously colored brown, green, or red. It may be white, spirally banded with red and brown, or almost entirely brown or red. The operculum is thick and white. These turban live in tide pools and under rocks. The Hawaiian name for the shell is Kaelelani. Named after a beloved chief of Kaua'i where they are found in abundance. At Kawaihae, turban shells are found moderately but we have not seen them on adjacent beaches.

2. *Turbo Sandwicensis* A larger variety of Hawaiian turban shell which can grow more than 50 mm. The shells are green, gray, black and brown. The operculum is green and brown. This shell is common under rocks in shallow waters and on reefs outer edges. This is a native to Hawai'i and care should be taken where these shells are concerned. As any native creature to Hawai'i.

Family Strombidae

Strombids are recognized by the outer thick lip. The interesting fact about Strombids is there ability to move through the water. The narrow muscular foot digs into the sand enabling the animal to move in a sort of leaping manner. At times, more than a meter in distance. These animals are herbivorous, and feed on filamentous algae.

1. *Strombus maculatus* (Sowerby, 1842) This shell is elongate, with swollen shoulders, and is cream colored with brown designs and white on the inside. The Hawaiian word for this

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shell is Alilea and known commonly as the large dove shell. These shells are strung in the pikake rope style and resemble the momi shell. They are strung on nylon monofilament fish line. Because piercing these shells are difficult, they are not often, made into leis. The leis are bulkier therefore, mostly worn by men. These shells are frequently found at Kawaihae small boat harbor. These shells live at a depth of 2 m. A good days find is 6.

Family Cypraeidae

This family cypraeidae, are more commonly known as cowries. The Hawaiian word for the animal is leho. Culturally, the Hawaiian people would use this shell in the catching of octopus. It is the most popular because of its shine and elaborately patterned shell. They are found from shallow waters to depths of about 100 m. They feed on a variety of algae; some others feed on sponges. Extra pollution could affect the food source of these animals. Over collecting is definitely a problem in its habitat. Whenever I find these shells at Kawaihae, they have already been vacated. During high surf I have found live specimens but as a means of conservation thrown it back. Cowries are used at the ends of shell leis.

A variety of Cypraeidae live in Hawaiian waters.

Cypraea mauritiana also known as the fire cowry. Known in Hawaiian as Leho ahi. Leho `ula are highly prized and very

rare.

Cypraea maculifera known in Hawaiian by leho kolea because it's designs resemble the kolea bird.

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Cypraea capulcaput-serpentis resembles the head of a serpent. This species is native to Hawaii. Also known as "black cowry" poleholeho `ele`ele, poleholeho kupa this cowry is native to Hawaii.

Cypraea granulata Known to Hawaiians as leho `o kala or leho `o pu`u pu`u and rough cowry. The unbleached ones are known as pink cowry or poleholeho `akala.

Cypraea helvola Is species of cowry that is variegated in color. Known by Hawaiians as Leho `o pule.

Cypraea moneta is also known in Hawaii as a white money cowry or coral cowry. In the Hawaiian islands it grows about 26 mm in length and is recognized by it's triangular shape and its yellow color.

Cypraea isabella These cowries, about 32 mm in length, are cylindrical in shape, orange-brown with linear black streaks, and with the extremities dark brown. The animals are common in shallow water and have been recorded to depth of about 80 m. These shells are also known as bracelet cowry and poleholeho lenalena.

Cypraea sulcidentata about 35 mm in length, the oval shell is creamy brown, and banded by four darker bands. These

animals live in deep water on coral heads.

Family Columbellidae

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Columbellid shells are distinguished by their shape and polish, often brightly colored shell. They have a variety of colors and sculpture. Some are herbivorous while, others are carnivorous.

Anachis miser are also known as bumpy laiki or rice shells.

Colors range from pure white, to mixed brown or black designs. They are strung like momi shells but because they are larger fewer shells are needed.

The shell is found in shallow water. *Anachis miser* is found at Kawaihae. These shells will not be able to survive if the harbor is dredged deeper.

Euplica Varians (Sowerby, 1832) These shells are about 10mm in length, are conical, solid, with a wide shoulder, and noded below the suture on the last whorl. The people of Ni'ihau have used these shells in the making of elegant leis which are highly prized in Hawai'i. There are many varieties of colors some identified here by the Hawaiian names.

1. Momi 'onikiniki- white splashed with brown spots.
2. Momi Lenalena- Yellow in color.
3. Momi ke'oke'o - Pure white in color.
4. Momi kahakaha- Yellow background variegated with brown stripes.
5. Momi uliuli Shells with a blue hue.
6. Momi waha 'ula 'ula - White shells with red as if dipped in red paint.
7. Momi 'onikiniki 'ele'ele- White shell splashed with black

spots.
8. Momi kahakaha ikaika- Richly designed with kahakaha pattern.

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9. Momi uliuli ikaika- E. Varians very dark in color. Said to be fossilized momi shells.

All these shells are found on the small beach within the Kawaihae small boat harbor, which is in the planning by the state, to be improved. These columbellids are found on the rocks in tidepools in shallow waters on reefs.

Mitrella Margarita (Reeve 1859) These shells, 10mm in length, are ovate, smooth, and shining. They are ivory stained with yellow-brown lineations and freckles, often with a spiral of white and brown below the suture. These shells live deeper in the water than *Euplica Varians* and *Anachis Miser*.

Family Architectonicidae

Architectonicids are lowspired shells. the whorls coiled on a wide axis, and the umbilicus is often open all the way to the apex. Architectonicids feed on corals and sea anemones.

Helicatus variegatus (Gmelin, 1791). The shells, are about 12 mm in diameter and 9 mm in length, are turbiniform, with inflated, convex whorls spirally sculptured by small granules, and variegated brown and black. The Hawaiian word for these shells is Kauno'o. The kauno'o shell is used at the ends of shell leis. It is beautiful and intricate designs are an elegant feature. These shells are found frequently at Kawaihae small

boat harbor.

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Family Melampidae

The *melampids* are *pulmonates*, found high along the shoreline where they are beyond the reach of the tides, but within the reach of sea spray.

Melampus castaneus (Muhlfield, 1816) These shells are about 13 mm

in length and 7 mm in diameter, are ovate, the last whorl the largest and the spire short, smooth, and dark brown. This shell is known by the Hawaiians as poleho or night cowry. They are frequently found at Kawaihae small boat harbor. Poleho are used to end the shell leis.

Family Pectinidae

The pectins, or scallops, comprise a large group of bivalves, which are most abundant and attain their largest size in temperate waters. Pectin shells are more or less circular in outline with a straight line of the hinge. The right valve is usually identified by a notch through which the byssus passes.

In some species the two valves of the shell are similar (equivalve); in others the two valves is usually radially ridged and often tinted with bright colors.

These shells are also found on Kawaihae small boat harbor.

Chlamys irregularis (Sowerby, 1842) The valves often more than 30 mm in height and 27 mm in diameter, are subcircular, thin barely inflated, and inequivalve. They are white and yellow with red and brown blotches. These shells are found at depths

of 12 to 150 m.

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Haumea juddi (Dall, Bartsch and Rehder, 1938). In these pectins the valves, 19 mm in height and 18 mm in length, are subcircular, moderately solid, and distinctly inequivalve. The right valve is white with a reddish spot at the umbo; the left valve is mottled and banded with red brown. They are common at depths from 8 to 100 m. *Haumea juddi* was describe as native to the Hawaiian islands. *Haumea* is the name of a Hawaiian goddess famous in Hawaiian folklore.

Conclusion

In conclusion we hope you people in the u.s. Department of Transportation take into consideration our feelings of cultural values that the Hawaiian ancestors and descendants have to this day. We feel that our kupuna (ancestors) are talking to us loud and clear. They say, "Go from your na'au (where the mana is stored). The shells called by my name are like precious gems to the Hawaiian people. The right to gather them is just as precious as the gem itself. In this day and age, our people have to endure a lot of humiliation, and loss of identity purely because of the introduction of foreign people after Captain James Cook arrived in 1778. We have been grieving for the loss of our queen, rights to govern ourselves, and loss of stolen land. These shells are just as important as all that we lost. Extinction of the Island of Hawaii's species of shell harms the Hawaiian people in the same way. The loss of a recreational area, where children learn to swim, surf, and do other Hawaiian traditional practices, is highly offensive to us in the

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community on Hawaii Island.

11

So I'd like to, urge you to stop this project from harming my people anymore. I say, save the shells and our island from over population, over development. Don't pour cement over our gathering and recreational area.

In your letter to me dated February 22, 2001, you addresses to my comments in from my first letters

I find unexceptable and deceiving. All you are basically telling me is that you read my letter and you are not going to tell me what is in the EIS until it is published. I find that deceiving. Don't tell me you know the ahupua'a system and gathering rights. If you knew them you would stop your plans for the

Kawaihae Harbor.

I don't even know why you sent me that letter. It does not tell me anything that I wanted to know from my first letters dated, November 29, 2000 and January 18, 2001. Please, send me letters that are worth the .34 cent stamp.


Very Sincerely, Momi Subiono
Hawaiian Studies Teacher
February 20, 2001

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May 15, 2001

Ms. Momi Subiono
HC-1 #16
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your letter dated February 12, 2001 which was received by R.M. Towill Corporation on February 27, 2001, providing comments on the above-referenced Draft Environmental Impact Statement.

We appreciate the information you provided regarding the types of shells you say are found at Kawaihae Harbor. However, please note that none of the shells found on the coral stockpile are under federal protection as threatened or endangered species.

The "beach" to which you refer is a man-made pile of coral that was dredged from the immediate area to create the harbor's turning basin and piers. The dredging may have increased the opportunity for collection by creating a localized stockpile of shells. Oral histories indicate anecdotally that prior to dredging of the commercial harbor gathering along this coastline focused on collection of seafood such as mullet, crabs and limu for subsistence living. They also indicate that shell collection became popular on the coral stockpile area immediately after the harbor was dredged, but later the community lost interest.

With regard to the loss of recreational area, Kawaihae Harbor is first and foremost a commercial harbor facility. However, the DOT-Harbors Division's practice of allowing the public to use the undeveloped portions of the harbor for recreational purposes is expected to continue, subject to the same safety considerations in effect today.

With regard to "population explosion," population growth has been forecast by the County of Hawaii as shown in Table 19 on page 4-1 of the DEIS. The growth is expected to occur with or without harbor improvements at Kawaihae. In addition, economists at First Hawaiian Bank have determined that recent growth in west Hawaii

Ms. Momi Subiono
May 15, 2001
Page Two

has, in fact, not resulted in inflation of residential prices. Page 2-12 of the DEIS states: "Although the Island of Hawaii building permits are up, offshore demand for second homes in west Hawaii is not fueling a speculative market as it did in the past." Without harbor improvements the cost of living and traffic in west Hawaii could increase because more goods would have to be shipped via truck from Hilo Harbor, the only other commercial harbor on the Island of Hawaii. With regard to the "area right below Puukohala heiau," this area is outside the scope of the harbor and harbor development. Any drainage problems that may have resulted in silt deposits did not originate from Kawaihae Harbor as the harbor is "downstream" rather than "upstream" from this area.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

Momi Subiono
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(1)

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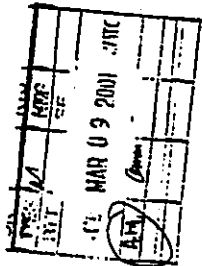
Dear Gail Atwater and Chester Koga,

This is my next testimony. Please make sure it gets in the next EIS.

The subject of the matter is Endangered Species. For your information, your Marine Biology expert who only saw one turtle their that day must not of worked very hard for the money because my husband has seen many turtles inside of Kawaihae Small Boat Harbor near the LST ramp. In one day, around 15 turtles were seen by my husband. Frollicking in the Harbors North Beach Cove.

This project threatens the well being of these turtles which by the way are my 'aumakua (ancestral guardian) as well as the shark. The females once laid there eggs along the original beaches that you destroyed. Now they have no where to lay there eggs as they need to return to the original beach that they were born at to deposit eggs of there own. What happened to the turtles grounds? I know all about the green sea turtle because I have been a teacher for five years and I taught the students all about the honu (green sea turtle), and the Honu 'ea (Hawksbill turtle). From my understanding, these turtles need to have access to a beach in order to deposit there eggs. That is why you should not be allowed to pour cement over the area in question. You will be harming the only beach you have left for them to use.

This is the information I have on them. You need to thoroughly look in to these matters as soon as possible. You should've hired me to do your ocean study. I have no degree and I can do a better job. I will also send letters to the National Marine Fisheries Service, the US Fish and Wildlife Service, the Department of Land and Natural Resources on the matter. I will be expecting a letter from you soon on this. Please don't tell me that you will address my concerns on this in the next EIS. I want an answer way before that Final EIS comes out.



(2)

Information about the Hawaiian Green Sea Turtle

Scientific name: *Chelonia Mydas*

Hawaiian name: Honu

The green sea turtle is the biggest sea turtle with a hard shell. Its oval upper shell, the carapace, is dark brown and black with flecks of olive and gold; its underside is yellow-orange. The green sea turtle is not green in the outside: it gets its name from the color of its body fat. This fat was used medicinally by the Hawaiian for their art of healing called lomilomi. Males and females look very similar except the male has a longer tail. A full grown sea turtle may be 40 inches long and can weigh as much as 400 pounds. The hatchlings are about 1 1/2 inches long and weigh around 1 ounce. Hatchlings have very dark carapaces and white undersides. This kind of coloring, called countershading, is common in sea animals and makes them hard to see in the water.

Green sea turtles have long flippers and tough, scaly skin. Their eyes are black, and they have no outside ears, but they can hear. The green turtle's mouth is shaped like a parrot's beak and made of horn like material.

Habitat

Green sea turtles are ground in warm ocean waters in Hawai'i. The honu swims and feeds in the shallow waters just off the shores of the Hawaiian islands where the seaweed should be preserved and kept from pollution in order to insure the survival of the species in the area. The habitat of the honu is threatened by the Commercial Harbors Master Plan 2020.

Population

Fossils reveal that sea turtles lived 180 million years ago, when dinosaurs were still on the earth. Once tens of millions of green sea turtles lived in the oceans of the world. Today, scientist guess that there are fewer then half a million left. Only two hundred females come ashore each year in Hawai'i to nest.

(3).

Food

In the wild, the adult green sea turtle does not eat other animals. It feeds on the seaweed and sea grasses of the shallow waters near the Hawaiian Islands. The turtle has no teeth, but ridges inside its mouth enable it to grip and tear food.

Unlike the adults, the hatchlings are meat-eaters. Scientists have looked at stomach contents and think the hatchlings eat jellyfish and other small spineless animals during the time they spend in their unknown nursery in the sea.

Protection

Since 1940, all but two of the Northwestern Hawaiian Islands, where the green sea turtle nests, have been part of a National Wildlife Refuge. It is against the law to disturb any of the animals and birds that live in Kawaihae Harbor. Under the Endangered Species Act, which makes it against the law to hurt, bother, chase, hunt, shoot, wound, or kill any endangered or threatened species. Only scientist who are studying the turtles can do so under special permit.

It will be a long time before we know if these laws are working, because green sea turtles grow very slowly. They may take as long as twenty five years to grow big enough to breed! We do not know how long they live, but scientists think many of them grow very, very old.

Other Sea turtles of Hawai'i

Besides green sea turtles, there are two other kinds that live in the ocean waters of Hawai'i: the hawksbill and the leather back. Sometimes, loggerheads and olive ridley visit island waters.

The Hawksbill

The Hawksbill or Honu 'ea in Hawaiian, is smaller than the honu, its head is more narrow, and it has sharp beak. Its main food is sponges. Which may be also in the harbor and are threatened by the 2020 Master plan for Kawaihae Commercial Boat Harbor. The hawksbill's upper shell is dark brown with yellow and reddish streaks and is prized for its high gloss shine and have been use throughout Polynesia by native people for combs and other jewelry. It is thought that the meat of the Honu 'ea is poisonous, depending on what it has eaten. Very small numbers of this turtle nest on Hawai'i and Moloka'i, where the eggs and hatchlings are at the mercy of developments, dogs, cats, and mongooses. The hawksbill is an endangered species and scientists fear it will soon be extinct in Hawai'i if the State is allowed to go through with it's Master Plan 2020.

In Conclusion,

My father was given a gift of a stuffed honu 'ea a very long time ago on a trip to Palau. I have this gift now at my home. I have used it countless time for educational purposes. It is one of our family heirlooms. I feel privileged to have one especially one given as a gift.

In the olden days the Hawaiian deified there ancestors. I feel the honu is my ancestor. An 'aumakua is an animal, plant or element of nature believed to be a spirit of a deceased ancestor who is still on earth and watching over us. The honu has been my 'aumakua since I was born. I am obligated to protect them by ancestral significance. Stop the project now. Save my ancestors.

Sincerely, Momi Subiono

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May 15, 2001

Ms. Momi Subiono
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Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement

Dear Ms. Subiono:

Thank you for your undated letter which was received by our office on March 9, 2001 with regard to the above-reference Draft Environmental Impact Statement (DEIS).

With regard to your comments on endangered species, the DEIS discloses that the marine biologist surveying the area observed a threatened green sea turtle *Chelonia mydas* in Kawaihae Harbor. These turtles currently coexist with commercial shipping and pleasure boating activities in the harbor without incident. In addition, the DEIS contains specific information about how any threat to the safety of these turtles will be mitigated during construction activities. The DEIS states, "Because of the occasional presence of a threatened species within both harbors, Harbors Division will maintain close coordination with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service during project planning and construction. The threatened green sea turtle will be protected from dredging and pier construction activities through the use of at least one siltation curtain at each harbor location. The flexible fabric curtain will create a barrier from construction, preventing the turtles from entering an area of potential harm."

Green sea turtles cannot lay their eggs on the coral stockpile because it is not a sand beach. Further, Kawaihae Harbor is not known as a habitat for the green sea turtle. With regard to hawksbill turtles, our marine biology consultants, AECOS, Inc., inform us that hawksbill turtles are very rarely found in the harbor.

Ms. Momi Subiono
May 15, 2001
Page Two

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

DATE	TIME	INITIALS
MAR 16 2001	1:14 PM	ALM
MAR 16 2001		
CNC		

(P)1191.1

TO: Mr. Glenn Soma
Department of Transportation

SUBJECT: Hawaii Commercial Harbors
2020 Master Plan
Draft Environmental Impact Statement

Thank you for the opportunity to review the Hawaii Commercial Harbors 2020 Master Plan Draft Environmental Impact Statement.

This project does not impact any Department of Accounting and General Services projects or existing facilities. Therefore, we have no comments to offer.

Should you have any questions, please have your staff call Mr. Allen Yamanoha of the Planning Branch at 586-0488.

Jason Matsuoka

GORDON MATSUOKA
Public Works Administrator

AY:mo R.M. Towill Corporation
Office of Environmental Quality Control

Liz De Roche
Box 247
Hawii, HI 96719
March 15, 2001

State Department of Transportation
Harbors Division
79 South Nimitz Highway
Honolulu, Hawaii 96813

Attention: Glenn Soma

Regarding: Hawaii Commercial Harbors 2020 Master Plan Kawaihae

Dear Mr. Soma,

As a concerned citizen of Hawaii County I request the Department of Transportation schedule two public informational hearings, one in Kawaihae and one in North Kohala, no later than March 30, 2001 so that the residents of this area can hear about the proposed development of Kawaihae Harbor and voice their opinion.

You told Momi Subono that there had been several public meetings about this plan. According to Table 21 (Page 7-9) of the DEIS the only public information meeting about Kawaihae Harbor was held on June 17, 1998 at the Kona Airport. That is hardly sufficient to provide the public with the information they are entitled to considering the magnitude of the proposed project.

I believe your department is attempting to slide this project through without public awareness. If this is the case you are sadly mistaken because I intend to do everything possible to make everyone aware of it. What you are attempting to do is a potential environmental disaster and a violation of Hawaiian Rights.

I enclosed you will find my initial comments on the DEIS. I want an immediate written response to them.

Sincerely,

Liz De Roche

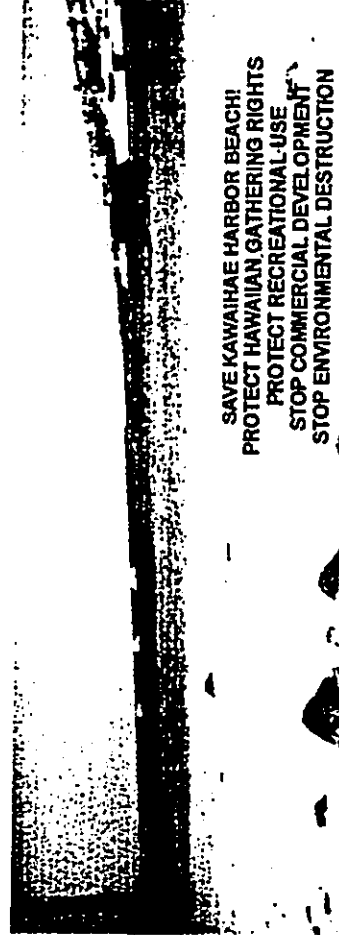
Cc:

Nancy Heinrich
Office of Environmental Quality Control
235 S. Beretania Street, Suite 702
Honolulu, Hawaii 96813

✓
R. M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817-4941

Chris Yuen, Planning Director
County of Hawaii Planning Dept.
25 August Street
Hilo, HI 96720

FILED	REC'D	DATE	TIME
		MAR 13 2001	10:00 AM
HAWAII COUNTY			



SAVE KAWAIIHAE HARBOR BEACH!
PROTECT HAWAIIAN GATHERING RIGHTS
STOP RECREATIONAL-USE
STOP COMMERCIAL DEVELOPMENT
STOP ENVIRONMENTAL DESTRUCTION

March 11, 2001

COMMENTS CONCERNING DEIS FOR HAWAII COMMERCIAL HARBORS 2020 MASTER PLAN

1. A current comprehensive cultural assessment of the Kawaihae region was not prepared. Conclusions were drawn from Archaeological Survey and Testing, Kawaihae 1 (Kamohana), South Kona, Hawaii. (Cultural Surveys Hawaii, Revised, 1991.) and an oral history account taken in January 2001 from Mr. John Keosala Lake. Kawaihae Harbor is not even in Kamohana (Kawaihae 1) Ahupua'a. It is in Hiihina Ahupua'a (Kawaihae 2). Contemporary cultural uses of the area were not considered. This area is the last available beach for shell gathering on the island of Hawaii. It is a fishing area. It is home to Pua Kaiima O' Kawaihae. It is the only recreational beach where families and pets can go without the regulations imposed by state parks and without the scrutiny of resorts and tourists.

2. The proposed development is an illegal use of ceded lands. Section 5 of the Admissions Act states "the provision of lands for public use." This development would eliminate all public use.

3. The building of Liquid Bulk Storage (aka petroleum) and subsequent transfer of such materials is an environmental hazard that would endanger marine life. On the map, which accompanied the initial EIS, liquid bulk storage was indicated on the Pelekane Lands. Now they say it will be on an adjoining area but it looks to me like they have moved the boundary of the Pelekane Lands.

4. Page 4-12 "Cooperative Agreement No. H-98-8, currently in force between the United States Department of the Interior, National Park Service and the Harbors Division, provides that the so-called Pelekane Lands are to be used as a state-owned "buffer zone that separates the archaeological significant Puukohola Heiau National Historic Site from the commercial harbor area. The Pelekane Lands are on ceded land not state land!"

5. The marine biology study complete September 2000 by AECOS is incomplete and improperly done. Spending a Saturday and Sunday at the beach doesn't constitute a proper study. This is quite evident in the fact they reported only one Green Sea Turtle when there is a large number of them in the harbor. They didn't report anything about the fact the harbor is a nursery area for Hammerhead Sharks. There are numerous invertebrates present in the harbor that are not on their list.

6. The report contradicts itself in several areas. Example:

Page 4-18 Potential Impact on Social Environment

"Further, recreational practices are not planned to be curtailed from currents levels at either harbor under the 2020 Master Plan."

COMMENTS TO COMMERCIAL HARBORS 2020 MASTER PLAN
SUBMITTED BY LIZ DE ROCHE BOX 247 HAWII HI 96719 889 5372

Page 10-1 at Kawaihae Harbor, recreational uses of the area proposed for Piers 3, 4 and 5 would be curtailed in the short-term during construction and eliminated in the long-term, with the exception of fishing off the piers.

7. Glen Soma, Harbor Planner, DOT, told Momi Subiono that there had been several public meetings about this plan. According to Table 21 (Page 7-9) of the DEIS the only public information meeting about Kawaihae Harbor was held on June 17, 1998 at the Keahole-Kona Airport. Although public information meetings are not required at this point, they may be requested and this should be done immediately. Requests must be submitted to Glen Soma. No one knows what is being planned for Kawaihae Harbor. Everyone Momi Subiono and I have contacted is totally opposed to the development. This is evident in the ten pages of signed petitions Momi and her husband collected this past weekend (March 10 and 11).

8. Work is already underway at Kawaihae Harbor until the guise of "repair and maintenance". This must be stopped before any further damage is done. They have already bulldozed the Makuhuna Gulch outlet to the fisheries area so it can no longer drain into the harbor. There are huge accumulations (piles over 15 feet high) of refuse, primarily car bodies, on the Pelekane lands. Pile diving is being done adjacent to the LST landing.

COMMENTS TO COMMERCIAL HARBORS 2020 MASTER PLAN
SUBMITTED BY LIZ DE ROCHE BOX 247 HAWAII 96719 889 5372

420 Wai'anae Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@towill.com



R. M. TOWILL CORPORATION
SINCE 1930

Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Construction Management

Ms. Liz DeRoche
May 15, 2001
Page Two

May 15, 2001

Ms. Liz DeRoche
Box 247
Hawi, Hawaii 96719

Hawaii Commercial Harbors 2020 Master Plan Kawaihae
Draft Environmental Impact Statement (DEIS)

Dear Ms. DeRoche:

Thank you for your letter dated March 15, 2001 in which you provided a cover letter and attached comments on the Hawaii Commercial Harbors 2020 Master Plan Draft Environmental Impact Statement.

With regard to your cover letter dated March 15, 2001, the Hawaii Commercial Harbor 2020 Master Plan was developed with harbor user and community input in an open and inclusive manner as described in the DEIS, Table 21. Eleven stakeholder meetings and two public information meetings were conducted to produce a collaborative plan.

The following are responses to your "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan," dated March 15, 2001.

Item #1. "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan"

Your comments indicated that a current comprehensive cultural assessment of the Kawaihae region was not prepared. The DEIS follows the Office of Environmental Quality Control's "Guidelines for Assessing Cultural Impacts", adopted by the Environmental Council, State of Hawaii, November 19, 1997. The report, Archaeological Survey and Testing, Kawaihae I (Kamohana), South Kona, Hawaii, was referenced because a) the Guidelines for Assessing Cultural Impacts encourage looking at an area "greater than the area over which the proposed action will take place" and b) the document contained important information specifically about the Kawaihae Harbor area, including numerous oral histories. Contemporary uses of the harbor area such as shell gathering, surfing, swimming and recreational beach use were all acknowledged and

addressed in the DEIS. Please also keep in mind that the undeveloped coastline within Kawaihae Harbor is not a beach, rather than a stockpile of coral dredging materials deposited near the coastline when the harbor was created.

Item #2. "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan"

You state that "the proposed development is an illegal use of ceded lands." As a State of Hawaii agency, the Department of Transportation may rightfully develop the harbor area for public use. Public use is interpreted to mean use of lands for the public good, including provision of essential infrastructure for the State of Hawaii. Harbors Division pays for the use of ceded lands. Use of the area by the public for recreational purposes is not expected to be eliminated, rather it is expected to continue as today in undeveloped areas of the commercial harbor, with safety as the prime consideration in limiting use during certain harbor operations. The U.S. Army Corps of Engineers will continue to require that access to the shoreline and breakwater be maintained.

Item #3. "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan"

You state that "the building of Liquid Bulk Storage (aka petroleum) and subsequent transfer of such materials is an environmental hazard that would endanger marine life." Please be assured that construction of liquid bulk facilities will meet all current safety and environmental requirements, which are more stringent than ever before. You also state that "it looks to me like they have moved the boundary of the Pelekane lands." The boundary of the Pelekane Lands has not moved or changed from the specific area under Cooperative Agreement H-98-8.

Item #4. "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan"

You state that "the so-called Pelekane lands are to be used as a state-owned 'huffer zone' that separates the archaeological [sic] Puukohala Heiau National Historic Site from the commercial harbor area. The Pelekane Lands are on ceded land not state land." According to records in the Harbors Division Real Estate Division, the Pelekane lands are outside the boundary of ceded lands within the harbor. This is illustrated in the DEIS in Figure 28 on page 4-30.

Item #5. "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan"

We respectfully disagree with your comment that "the marine biology study completed in September 2000 by AECOS is incomplete and improperly done." During the marine biology survey, no specific attempt was made to assess the actual numbers of green sea turtles using the harbor. The fact that divers failed to see more than one is perhaps not

Ms. Liz DeRoche
May 15, 2001
Page Three

surprising as the turtles might avoid divers or the numbers may not be constantly "large" but variable from day to day. More turtles might regularly enter the harbor in the evening hours after the survey divers had left. If others have seen many turtles in the harbor on occasion, that is valuable information, but does not mean that everyone who goes to the harbor will have exactly the same experience every time. Further, there is no evidence that turtles ever used the beaches along this area for nesting in modern times. Unfortunately, no beach in this area today would be attractive to turtles for nesting purposes.

With regard to your comment "They [the marine biology consultant, AECOS, Inc.] didn't report anything about the fact the harbor is a nursery area for Hammerhead Sharks," AECOS responds as follows: "We have not heard before that the harbor is a nursery for hammerhead sharks. It is possible that because the harbor provides sheltered conditions along a coast with few large bays, juvenile hammerheads are attracted here. It is unlikely that the proposed changes would alter conditions sufficiently to reduce use of the harbor's waters by either turtles or sharks. In addition, harbor resources most attractive to these marine creatures are going to be along the outer margin of the harbor."

With regard to your comment, "There are numerous invertebrates present in the harbor that are not on their [AECOS'] list," we acknowledge that the AECOS study did not report every invertebrate species present in the harbor. It focused on characterizing the kinds of benthic communities present as indicated by the more obvious creatures living there, emphasizing those areas designated to undergo the greatest physical alterations under the Hawaii Commercial Harbors 2020 Master Plan.

Item #6, "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan"

You state "the report contradicts itself in several areas" citing comments on pages 4-18 and 10-1. Kawaihae Harbor is today and will continue to be a commercial harbor in which certain recreational uses are permitted. With the proposed development recreational activities such as swimming will not be able to occur where new piers will be constructed, but are expected to continue in the undeveloped areas of the harbor, according to Harbors Division. Recreational fishing will be able to continue in the undeveloped areas as well as on the new piers, subject to the same safety considerations in effect today. Please also note that the fisheries area remains on the map of proposed improvements to the harbor (Figure 9, page 2-21 of the DEIS).

Item #7, "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan" With regard to your comments on public meetings, the Harbors Division conducted meetings with the public for more than one year during the development of the Hawaii Commercial Harbors 2020 Master Plan. Prior to the public meetings held on June 10 and June 17, 1998, press releases were sent on May 22, 1998 from the

Ms. Liz DeRoche
May 15, 2001
Page Four

Department of Transportation to West Hawaii Today, the Hawaii Tribune, Honolulu Advertiser Big Island, KPOA, KIPA, Honolulu Advertiser and Star-Bulletin. The press release contained the following announcement: "The draft Hawaii Commercial Harbors 2020 Master Plan is a joint effort by the harbor users, other private and public agencies, and concerned citizens. This Task Force has worked for a year to develop the draft plans for Hilo and Kawaihae Harbors that accommodate the essential, commercial maritime industries - interisland, overseas, liquid and dry bulk cargo, passenger, and fishing."

In addition, since December 2000 there have been two public comment periods totaling 75 days (30 days for the Environmental Impact Statement Preparation Notice and 45 days for the Draft Environmental Impact Statement). Copies of the EISP and DEIS were sent to stakeholders involved in the harbor planning process as well as other interested parties, including yourself. Further, copies of the DEIS were provided to local newspapers West Hawaii Today and Hawaii Tribune Herald. Articles appeared in West Hawaii Today on March 13 and April 12 concerning the Hawaii Commercial Harbors Master Plan, further informing the public of the Island of Hawaii about the development plans.

Item #8, "Comments Concerning DEIS for Hawaii Commercial Harbors 2020 Master Plan" Regarding your comment that "work is already underway at Kawaihae Harbor under the guise of 'repair and maintenance'", the Harbormaster of Kawaihae Harbor provided the following information. Harbors Division is not aware of any bulldozing being done except where grading is being done to pave the former bulk sugar area, which is well away from the water. The car bodies are believed to be among other scrap metal items being consolidated on the coral stockpile area prior to shipment. The work being done at Kawaihae Harbor is the replacement of a mooring dolphin by the Army of the Army's LST Ramp. One of their vessels damaged the outermost dolphin and it requires replacement which involves pile-driving.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Charles T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION

Momi Subiono
89-709 Lani Kona Rd. Hwa 15 11 48 AM '01
CC, HI 96704
(808) 328-8939

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

Attention:
Glen Soma
Brian Minaai

Aloha,

Enclosed is the petitions we have gotten signed so far. There is alot more to come. Any other petitions you are sent should go in the final Environmental Impact Statement. All these people were at the surf meet this weekend at Kawaihae. They "all" were shocked, horrified and upset about the whole Master Plan for Kawaihae 2020 and not one said they were for it. They want to be informed when you finally do decide to have public hearings on it. They demand that you do so. We are turning this and any other petitions you receive, as testimony the voice of the people. Every single abled adult there signed. Mr. Soma this is the voice of the Community of the Island of Hawai'i. The people want the Master plan 2020 for Kawaihae Harbor killed. It is that simple. We want dirt brought in and trees and grass planted on the premises. We all demand you to put the garbage can back and add more. Every one of these people no matter where they are from feel strongly that you should keep Kawaihae LST ramp as a recreational area. The only improvements we want on the area is for you to make the area in it's entirety, an Eternal Community Park. Everyone of these people said, "No way! This is our Beach!" "They can't take it away!" They all expressed ownership to the whole area. You will be receiving more petitions. The Community is speaking out. We want the whole area turned into a Park.

Very Sincerely,
Momi Subiono
Momi Subiono

01.0947
DIRECTIONS OFFICE
DEPT. OF
TRANSPORTATION

Reasons for opposing the development of Kawaihae Harbor 2 36 PM '01

1.) The ecosystem will be threatened by the extra pollution brought in to the area by bigger boat traffic emitting more gas and oil into the water.

2.) Population explosion on the island will be encouraged by the harbor, and the "developments" the harbor will support. (In fact, land development is land usage). Examples, Keolu (Hokuli'a) Kona, Hawai'i.

3.) The new jobs will not go to the island's residents of Hawai'i. The new positions will be filled largely by employees of the large corporations which they will import from elsewhere.

4.) The new housing and new towns will drive up property values and property taxes and higher prices. This pattern has occurred many times elsewhere. Examples, Vail and Aspen, Colorado. O'ahu.

5.) The quality of life in Hawai'i will be rapidly degraded by the new highways, and storage areas, housing the new harbor.

6.) The harbor will help large corporations become richer. It will not help the people of Hawai'i. It will not stop inflation of products.

7.) The project will harm Hawaiians who gather and use the area for historical, recreational, fishing and gathering in the area.

8.) The archeological sites will be threaten by any development in the area as proven in the past.

A.) Extra dirt created with the first development in the area that has killed all the coral reefs in the water. This is on Hale o Kapuni which they cannot find (old) because of the dirt. This shark helau is very significant to the Hawaiian people and we do not want anymore damaging development in the area.

B.) Harm to the grasses in the area across the street from the proposed development.

C.) Buffer for Pu'uhonua (The Pelekane Lands) will be used as liquid storage and will no longer be a buffer putting the helau at risk of development damage.

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	Thomas Oden	P.O. Box 1367 PAHOA, HI	982-8086
2)	Kyle Rogers	P.O. Box 1931 PAHOA HI	977-5953
3)	Mally Alvarez	HCR 3 BOX 13521 KAILUA HI	966-4029
4)	Nicole Montalvo	411 Hupli Pl Hilo HI	935-0704
5)	Paul J. Maciaz	101 PUAKO BEACH DR, KAMUELA HI	882-4661
6)	Sam McFadden	1122 BOX 4041 PAHOA, HI 96728	965-8127
7)	JENNIFER WILLIAMS	" "	" "
8)	Chris Granda	188 Hale St. #46 Hilo HI 96720	961-5159
9)	Cora Rillio	" " " " " "	961-3169
10)	MEL BELKA	74783 UHIA'OA ST. KAILUA KONA 96740	729-1400
11)	Monique Edwards	P.O. Box 1375 KAMUELA HI 96743	
12)	Randy Thomas	P.O. Box 44916 KAWAIIHAE HI	882-1077
13)	MARK D AYERS	683776 Lailua Pl Wailuku	9883-8227

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	Bullet W. Obra	Kamuela	882-2521
2)	PENE BALANGA		
3)	RUI BALANGA		
4)	ALAN BALANGA	11-B Puako Beach Dr	982-1620
5)	MING BALANGA	Kamuela HI	
6)	Donald Bois	584045 Wailuku HI 96738	883-8408
7)	Melinda Kaupika	" "	" "
8)	Tennille Howard	11-A Puako Beach Dr	882-1017
9)	Nikki Howard	Kamuela HI 96738	
10)	Arthur Howard	7 W. P.O. Box 2190 Kamuela HI	96738
11)	Shantel Abong	11-B Puako Beach Dr	96743
12)	Shila Abong	" " "	882-1017
13)	Paul Clark	P.O. Box 3249 Kona HI	96745

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	CHRISTOPHER YOUNG		
2)	JILLIA YOUNG	73-478 MAHUA RD K-2nd fl 96740	3257436
3)	CAMERON YOUNG		
4)	JUN BALANCA	PO BOX 40544 KAMUELA 96743	8874617
5)	JAYME BLUE	PO BOX 442 CAPT COOK 922894	
6)	EDEN WALK	PO BOX 157 HONOKAA 96727	775-9726
7)	JARON ABRAN	P.O. Box 761 HONOKAA 96727	936-7287
8)	KARY KELLEY	P.O. BOX 691 KAPAHA, HI 96755	885-5000
9)	DENNIS MCKENNA	PO BOX 4464, KAMUELA, HI 96743	936-4505
10)	BUFF WILLARD	BOX 396 HAWI, HI 96719	889 0288
11)	BOWPY CAMPBELL	BOX 744, KAMUELA, HI 96743	
12)	CINDY OSWALD	BOX 912 KAMUELA HI 96743	
	Rick Johnston	Genl. KAMUELA HI 96743	

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	ROSEMARY ALVES	PO BOX 1430, KAMUELA HI 96743	808 775 9000
2)	Patricia Owen	POB 135, HAWI 96719	
3)	Robert Young	PO Box 190 556, HAWI 96719	
4)	June St. John	P.O. Box 527 Honokaa HI 96727	
5)	KAIKI GUNDERSON	PO BOX 243 KAMUELA, HI 96743	#885-5390
6)	NONEA MASAOKA	PO BOX 765 KAMUELA HI 96743	#965 8952
7)	AUDRA MCISTERO	P.O. BOX 1450 PAHOA HI 96778	#965-49513
8)	Patricia Minter	P.O. BOX 1450 PAHOA 96778	965-49513
9)	Quintia A. Tiggan	343 Lele St Hib, HAWI 96720	
10)	Theresa J. Gentry	P.O. Box 691 Kapa 96778	915-1674
11)	Patricia Fushimi	P.O. Box 853	
12)	Cathy Emery	P.O. Box 1240 PAHOA, HI 96778	
	Debra J. O'Neil	PO Box 724 VOLCANO HI 96785	

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	Dorcas Rene Lledrid-Ahu	RE 3 Box 1122, PAHOA	982-9614
2)	Eric B. Ahu	RE 3 Box 1122, PAHOA	982-9614
3)	Myron Guertler	PO Box 350 KURTZ JONN	966-8162
4)	Jamett Enriquez	P.O. Box 691 PAHOA	965-6674
5)	Shelie Labrator	HCE Box 4016, Kapaau	966-2105
6)	Likiep R. Wakinakona	P.O. Box 472 KAMUELA	982-2225
7)	Tasha Nikau-Lindsay	P.O. Box 1 KAMUELA, HI	885-4632
8)	Garren Lindsay	P.O. Box 6643 KAMUELA, HI	985-8100
9)	Isaiah Lindsay	P.O. Box 2602 KAMUELA, HI	985-9385
10)	Betsy Lindsay	P.O. Box 84 KAMUELA, HI	985-7510
11)	Kili Bull	P.O. Box	980-1273
12)	KALEA WAKINEKONA	PO Box 472 KAMUELA HI	96743 987814
13)	EZEKIEL R.H. WAKINEKONA JR	PO Box 472 KAMUELA HI	96743 987814

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	Satt Tiatson	135 Puako Beach Dr. Kamaea HI	96743 (808) 882-1165
2)	Colleen St. Nett	Box 2573 KAMUELA HI	96743 885-887-1444
3)	Jane Heinze	22 Kaimikaeli Village Kamaea HI	96743 882-7733
4)	Oliver A. Lopez	64651 Pua Noho Kamaea	96743 885-1663
5)	Robyn K. Pescaia	PO Box 888 PAHOA, HI	96728 965-5092
6)	Holly Crane	PO Box 4096 Kailua-Kona, HI	96745 334601
7)	Chad Beluga	P.O. Box 4096 KAILUA KONA, HI	96745 3349
8)	John Morrison	17 PUAKO BEACH KAMUELA HI	96743 882-7544
9)	Elaine River Crane	P.O. Box 4096 Kailua-Kona HI	96745 334-9201
10)	Robin B Williams	15-268 Kumu St. PAHOA, HI	96728 965-8324
11)	Sydney Kaku	11-B Puako Beach Dr. Kamaea HI	96743
12)	Maka Kalan	same as above	
13)	Danny Maligeo	P.O. Box 3642 KAILUA-KONA	96745 322-9368

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	TAMIKO KANERO	P.O. Box 1648 Pahoa, HI 96778	966-8162
2)	Noelle Hall	P.O. Box 1079 Kapaa HI 96741	895-8992
3)	SHAWN McVEIGH	62-1703 Akaka C#	895-2436
4)	Bob Black	R.D. Box 4431 Kapaeha	882-7816
5)	Garry Davis	1271A Makua St Hilo 96720	981-0496
6)	Bill Malen	P.O. Box 2261 Kamuela 96743	885-1717
7)	PATRICK GAWLEY	P.O. Box 2422 KAMUELA 96743	775-0640
8)	Jeanette Martin	P.O. Box 100545 HAWAII HI 96749	887-1282
9)	Phil	P.O. Box 234 HAWAII HI 96719	889-0121
10)	Ken	P.O. Box 190545 HAWAII HI	
11)	CHERRY STONE	P.O. Box 412 KAHULA HI	
12)	Michelle Busquet	P.O. Box 38308 Waikoloa	883-9485
13)	LYNSEY MARTIN	90 POHAULANI ST. HILO, HI	981-0730

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
	Daitra Ayers	65-3776 Laulea Pl Waikoloa 96738	883-5227
	Brian K. Cox	P.O. Box 2374 Kamuela 96743	884-4444
	M. Serrano	Box 1984 Kamuela HI 96743	
	Esther Okada	Box 246 Kamuela 96743	
	Maurie K. Pauli	P.O. Box 384802 Waikoloa HI 96738	
	Tammy Meyer	P.O. Box 1512 Honokaa HI 96727	
	K. P. P. P.	Box 5222 Honokaa HI 96727	982-2214
	N. Kuhns	Box 1761 Honokaa, HI 96727	988-3231
	L. English	Box 1761 Honokaa, HI 96727	938-3403

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	AUSTON LATIMER	48-1558 PUHANA AVE. MILWAU	808-328-9529
2)	BILL CYR	48-1558 PUHANA AVE MILWAU	
3)	Susan C. Day	48-1558 Ahala Ave Milohi	808-328-8713
4)	Jim Lynam	69-11334 H Kawaihae Rd Kamele	808-882-4632
5)	Conrado Mercado	P.O. Box 1787 Kamele HI 96743	808-882-4629
6)	KAPD YOUNG	480 " " "	4618
7)	NORMAN VENTURA	P.O. Box 5142 HAWAII HI 96721	775-8676
8)			
9)			
10)			
11)			
12)			

Please send all petitions to the State of Hawai'i, Department of Transportation, 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We the people of the island of Hawaii, we hereby oppose the development of a big harbor. Kawaihae has small boat harbor. We recognize the cultural significance of the area and we do not want our right to gather and use the area (in its entirety) taken away. Attached we have more reasons why we "oppose" any development in the harbor.

#	Name	Address	Phone #
	Melara Aming	P.O. Box 6288 Kamuela, HI 96743	885-7505
	Ekle & Ethel Long Oudrele	P.O. Box 104 Kamuela, HI 96743	885-6153
	Phed Oudrele	P.O. Box 104 Kamuela, HI 96743	885-6153
	Evel Kaelanekia	P.O. Box 216 " " "	885-4537
	Kuaka K. Raman	P.O. Box 7385 Kamuela	885-6864
	Gail Sauer-Sava	73-1381 Kaiminani Dr. K.K. 96744	325-6261
	Maia B. B.	P.O. Box 251 Kamuela, HI 96743	885-6430
	Margaret Spencer	" " 223 " "	885-4019
	Jess W. Face	" " 1469 Kamuela	885-3452
	Wendy H. Lindsey	P.O. Box 7472 Kona, HI 96743	885-4091
	Joe K. K.	P.O. Box 393 Honanua	328-107
	Earl N. Bell	P.O. Box 2301 Kamuela, HI 96743	885-4091
	Jane O.P. Olson	64-1043 Lualilo St. K.H. 96743	885-1995
	Doris M. Johnson-Purdy	P.O. Box 2996 KAMUELA, HI 96743	885-6829
	Martin Purdy Sr.	P.O. Box 2996 KAMUELA, HI 96743	885-6829
	Mahina Kakaikeli	P.O. Box 6185 " " 96743	885-0626
	Thomas P. Wright	P.O. Box 6185 " " "	885-0626
	Allen H. Lindsey	65-1819 Ho. K. 4419 Rd	885-4114
	Kenise P. Murphy	P.O. Box 101 Kamuela, HI 96743	885-7537
	Penelope K. Hedges	P.O. Box 791 Kamuela, HI 96743	890-2313

Please send all petitions to State Of Hawaii, Department of Transportation 869 Punchbowl St. Honolulu, Hawaii 96813-8097 or call Momi Subiono 328-8939

are signatures of
people from Waimea
who oppose the State
of Hawaii enlarging
the Harbor here at
Kawaihae, Hawaii

400 Waiulani Road
Suite 411
Honolulu, Hawaii 96817-4911
Telephone 808 842 1133
Fax 808 842 1937
eMail info@hawaii.com



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Ms. Momi Subiono
May 15, 2001
Page Two

With regard to the attachment to the petition, "Reasons for Opposing Development of Kawaihae Harbor," DOT Harbors Division has the following comments. Points are numbered in the same manner as on the attachment.

"1) The ecosystem will be threatened by the extra pollution brought in to the area by bigger boat traffic emitting more gas and oil into the harbor."

The DEIS discloses that over time the harbor benthic communities are likely to more closely resemble those of other harbor areas. However, even after almost 40 years of commercial harbor activity, Kawaihae Harbor still more closely resembles "nearshore coastal environments than those that might be found in restricted harbors with more turbid and nutrient enriched water masses" (DEIS, page 3-27, "Marine Biology").

"2) Population explosion on the island will be encouraged by the harbor, and the "developments" the harbor will support. (In fact, land development is land spoilage). Examples, Keolu (Hokulua), Kona, Hawaii."

Population growth (DEIS, Table 19, page 4-1) is expected to occur with or without harbor development. Harbor development will enable the required goods to reach west Hawaii in a more effective and economical manner than the alternative of shipping to Hilo Harbor and transporting goods by land.

"3) The new jobs will not go to the present residents of Hawaii. The new positions will be filled largely by employees of the large corporations which they will import from elsewhere."

All Harbors Division employees will be hired in accordance with State of Hawaii equal employment opportunity hiring procedures. The Harbors Division does not interfere with or dictate the hiring practices of private firms.

"4) The new housing and new towns will drive up property values and property taxes and higher prices. This pattern has occurred many times elsewhere. Examples, Vail and Aspen, Colorado. Oahu."

There is no evidence that harbor development will result in "new housing and new towns." Further, economists have stated that "offshore demand for second homes in west Hawaii is not fueling a speculative real estate market as it did in the past" (DEIS, page 2-12).

May 15, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your undated letter which was received on March 15, by the Director's Office, Department of Transportation, in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS). This letter also responds to the facsimile received in the DOT Director's Office on March 2, 2001 that contained the same petition form and a cover sheet entitled "Reasons for Opposing Development of Kawaihae Harbor."

With regard to public hearings, DOT-Harbors Division carried on an open, collaborative public process for over one year during the development of the Hawaii Commercial Harbors 2020 Master Plan. Harbors Division also conducted two public meetings on June 10 and June 17, 1998 to discuss the proposed plan before it was approved by major harbor users and the Governor of Hawaii. Proceedings of these meetings are summarized in the DEIS in Table 21 on pages 7-9 through 7-11. Prior to the public meetings held, press releases were sent on May 22, 1998 from the Department of Transportation to West Hawaii Today, the Hawaii Tribune, Honolulu Advertiser, Big Island, KPIJA, KIPA, Honolulu Advertiser and Star-Bulletin. The press release contained the following announcement: "The draft Hawaii Commercial Harbors 2020 Master Plan is a joint effort by the harbor users, other private and public agencies, and concerned citizens. This Task Force has worked for a year to develop the draft plans for Hilo and Kawaihae Harbors that accommodate the essential, commercial maritime industries - interisland, overseas, liquid and dry bulk cargo, passenger, and fishing."

"5) The quality of life in Hawaii will be rapidly degraded by the new highways, and storage areas, housing the new harbor."

New access roads at the harbor will be located within the commercial harbor boundaries and will improve future traffic flow into the harbor. The State of Hawaii's highway improvement program contained in its Long Range Land Transportation Plan will proceed independent of harbor development with the goal of improving traffic flow throughout the west Hawaii region.

"6) The harbor will help large corporations become richer. It will not help the people of Hawaii. It will not stop inflation of products." Within the harbor, employees of the State of Hawaii and private sector harbor users are predominantly residents of the Island of Hawaii. What benefits them economically also benefits west Hawaii. The largest private firms using the harbor, Young Brothers and Matson, are both companies with longstanding Hawaii roots and operations and are major employers at all of Hawaii's commercial harbors. With regard to inflation, failure to expand the harbor to handle needed cargo is likely to increase inflation in west Hawaii because of the cost of transporting goods via land rather than through the harbor.

"7) The project will harm Hawaiians who gather and use the area for historical, recreational, fishing and gathering in the area."

The Harbors Division has no intention of preventing public access to the undeveloped areas of the harbor's shoreline. Safety has always been and will continue to be the primary consideration in providing access. Further, the U.S. Army Corps of Engineers requires that access be provided to the commercial harbor's breakwater.

"8) The archaeological sites will be threatened [sic] by any development in the area as proven in the past." A) Extra silt created from the first development in the area that has killed all the coral beds in the National Park area on Hale o Kapuni (which they cannot find how because of all the silt). This shark helau is very significant to the Hawaiian people and we do not want anymore [sic] damaging development in the area. B) Harm to the graves in the area across the street from the proposed development. C) Buffer for Puukohola (The Pelekane Lands) will be used as liquid storage and will no longer be a buffer putting the heiau at risk of development damage."

The points A), regarding Hale o Kapuni, and B), regarding graves, refer to areas that are outside the control of Harbors Division and the potential environmental impacts of this project. With regard to point C), concerning the buffer for Puukohola, this buffer area will be retained, as shown in the DEIS in Figure 22, page 4-13 of the DEIS.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1	Philo Proulx	42-751A Kama'ehu Dr. Napo, Calif	313-281-9768
2	Bridgette Horan	P.O. Box 778 Maialii HI	437-8450
3	Linda Heaton	Box 1146 Cpt Cook HI 96721	328-8168
4	Sharon A. Mayberger	85-4532 Mammalahua Hwy - P.O. H. 96704	328-2173
5	Julie Jensen	40-4440 Maunaloa Hill CC HI 96721	328-1722
6	Janice McQuinn	P.O. Box 1146 Maialii HI	96772
7	Pier Seike	P.O. Box 1146 Maialii HI	96726
8	Rochelle Dougherty	P.O. Box 1413 Kilauea HI 96745	939-7904
9	Walter P. Nitz	P.O. Box 1271 Kilauea HI	939-7414
10	[Signature]	73-1084 Maialii Ln P.O. Kilauea HI 96745	825-6247
11	Phil Zank	68-7727 Eha'uku St Waikoloa HI	96728 PP-7716
12	Sharon Egan	68-3729 Eha'uku St Waikoloa HI	96738 883-3716

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

Momi Subiono
89-709 Lani Kona Rd.
Captain Cook, Hawai'i
96704

11/21/16, 2011

R.M. Towill Corporation
Attention: Gail Atwater
420 Waiakamilo Rd. Suite 411
Honolulu, Hawai'i
96817

Dear Gail,

Thank you for calling and making sure that I know you will publish all information and petitions in your Final Environmental Impact Statement (including this one).

I'm writing to you to clarify the areas of my opposition. On the phone you said you were a little confused when I mention Small Boat Harbor. Attached, is a copy of the map that I got from your first EIS. I am not talking about the area near the Kawaihae Canoe Club. I am talking about the area where all our families love and enjoy. Next to the LST ramp. The whole stretch of beach between the LST ramp and the so called fishery (dead grounds due to new construction, blocked off the free flow of water).

In some statements I am referring to damage to the ecosystem done at Pelekane Beach which is stagnant and dead. Once sharks would migrate through the area. Now, they cannot. When I talk about the Pelekane (Coded Lands) I am talking about the entire Pelekane Lands, specifically where you plan to store the petroleum and oil. I feel because of this, the ecosystem is at great risk of being damaged.

The break wall I am talking about is referring to the New Small Boat Harbor you spent millions of taxpayer dollars on. The wall is eroding and will be a money pit. You should've saved all that money and built a park in the Small Boat Harbor next to the LST ramp. Which is what I want to see done in the end of this fight.

Pua ka lina thinks that you will renew their lease (agreement, whatever) Can you please clarify this with me. I think they should know if you are going to let them stay. They are not on the 2020 Master Plan Improvements map. It is very easy to write in their name. Do you plan to do otherwise? Just tell me straight out. Please do not say that they need to be re-evaluated when their lease is up because the DOT wants to bring heavy equipment into the Harbor posing a threat to human life. I feel that the surf and Cultural Park is a fabulous idea for our Community. I would like to see the surf and Cultural Park extended to the current area located between the LST ramp, and the fishery area. I would like to be informed on your decision. If you can't say then I think you may be trying to deceive the public.

So I am now once again, asking the Department of Transportation to stop this project now. The 2020 Master Plan for Kawaihae Harbor will destroy our right to gather, Public shoreline access, and will completely kill off the fishing grounds. I strongly feel, that the public meetings on this are highly insufficient as well as your Cultural Assessment. I find it horrifying that you plan to destroy Kawaihae Beach for the sake of Big Business and Economic Sustainability. I see no logic in destroying our Cultural and Environmental Sustainability in order to achieve Economic Sustainability. I am not willing to sacrifice our Environment for the sake of Big Business.

Very Sincerely,
Momi Subiono
Momi Subiono

420 Wailuku Road
Suite 411
Hono, Hawaii 96717-6941
Telephone 808 842 1133
Fax 808 842 1737
eMail rmt@towill.com



R. M. TOWILL CORPORATION
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Planning
Engineering
Environmental Services
Photogrammetry
Surveying
Construction Management

May 15, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your letter dated March 16, 2001, addressed to R.M. Towill Corporation, in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

We acknowledge your request to ensure that the subject letter and other correspondence from you will be published in the Final Environmental Impact Statement for the Hawaii Commercial Harbors 2020 Master Plan.

We note that you clarified the location your "area of opposition" as the coral stockpile area near the LST ramp to the marine fishery area. Harbors Division is not aware of any construction that has "blocked the free flow of water" in the fishery area. What you call the "Pelekane Beach" is an area outside Kawaihae Harbor known as Hale o Kapuni or the submerged "shark leia". Hawaii Commercial Harbors Master Plan improvements are on Harbors Division property in a parallel but unrelated part of the subject shoreline.

The "Pele Kane lands" to which you refer are preserved in a buffer zone between Kawaihae Harbor and the Puukohola Heiau National Historic Site. The proposed liquid bulk terminal will not be located on these lands. Harbors Division acknowledges that there will be greater potential for damage to the ecosystem from a petroleum oil spill with the increased liquid bulk storage at the harbor. However, any new terminal will be designed, constructed and managed under stringent environmental guidelines that are meant to contain and prevent spills.

Ms. Momi Subiono
May 15, 2001
Page Two

The Small Boat Harbor to which you refer is administered by the State of Hawaii, Department of Land and Natural Resources and is therefore out of the jurisdiction of Harbors Division.

As discussed in the DEIS on page 4-23, "Pua ka ilima" (we believe you mean Pua Kailima o Kawaihae) is a non-profit organization which supports continued access to the shoreline, particularly for surfing. This organization currently has a cooperative agreement with the Harbors Division to maintain a "cultural surf park" at the ocean shoreline within the commercial harbor. Harbors Division indicates that they currently have no reason to believe improvements under the 2020 Master Plan will alter the arrangement with Pua Kailima o Kawaihae, since activities of the organization to date have safely coexisted with harbors operations. However, as with any such arrangement, the legal agreement with Pua Kailima o Kawaihae will have to be reviewed prior to expiration.

With regard to the final paragraph of your letter, please refer to the information above and our responses to additional letters from you which will be published in the Final Environmental Impact Statement for the Hawaii Commercial Harbors 2020 Master Plan.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

Momi Subono
89-709 Lani Kona Rd.
Captain Cook, Hawai'i
96704

State of Hawai'i
Department of Transportation
Attention: Glen Soma
869 Punchbowl St.
Honolulu, Hawai'i
96813-5097

Dear Mr. Soma and Mr. Minasi,

As always, I want this to go in the final EIS as testimony.

I just talked to Alice Akau. She grew up where the gas storage tanks are at Kawaihae Small Boat Harbor. She said that before you (the DOT) and the Army Core of Engineers started the first development at Kawaihae, those shells "were" found by their family. You destroyed the first ecosystem and now you wanna destroy it again by pouring cement over the area between the LST ramp and the so called fishery. Those shells are very rarely found at Spencer Park and the small beach near Kawaihae Canoe Club. I will do everything I can to keep the Hawai'i Species of Momi shells from going totally extinct. Just because they (Explica Varians, Mitrella Margarita, Turbinae, and other shells in my essay) are not on the Endangered Species List, does not mean that they are not Endangered. Your project will definitely cause these shells to go extinct. I was told by other people that their was public outcry in the past and you still went through with the Small Boat Harbor. Now there will be public outcry again. We want this project stopped and forgotten. We want the area between the LST ramp and the Fishery to be left for the public as a Natural Community, Cultural and recreational park. I am asking you again to put the rubbish can back and add two more. I want you to get rid of the huge pile of rubbish and cars stacked up near the Pelekane Lands. I would like you at the DOT to re open that water way again so the current can flow through to Pelekane Bay. We want you to take down the new chain link fences that you put up. You are perpetuating the decimation of our ecosystem. I want an immediate response to this.

Very Sincerely,

Momi Subono

420 Wai'anae Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
eMail info@rmc.com



R. M. TOWILL CORPORATION
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Construction Management

Ms. Momi Subiono
May 15, 2001
Page Two

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

May 15, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

Very truly yours,

Chetan T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your undated letter which was received by the Department of Transportation during the period of March 9 and March 19, 2001, with regard to the above-referenced Draft Environmental Impact Statement (DEIS).

Concerning your conversation with Alice Akau of Kawaihae, you will note William Akau of the same family was interviewed for the oral histories summarized in the DEIS. The possibility of tidal waves as possible Acts of God at both Kawaihae Harbor and Hilo Harbor is disclosed in the DEIS, as well as the requirements for stringent construction standards and containment facilities for liquid bulk facilities imposed by the Environmental Protection Agency.

Harbors Division and the 2020 Master Plan User Group, who worked together for more than one year to formulate the Hawaii Commercial Harbors 2020 Master Plan, also have expressed concern for environmentally safe harbor development. The DEIS provides information concerning ways in which harbor construction will proceed in a responsible manner in compliance with all applicable laws and regulations.

Kawaihae Harbor is a commercial harbor. As such, the use of lands within the harbor boundary will emphasize commercial harbor purposes rather than as a community park. The "huge pile of rubbish and cars" is scrap metal being stored at the harbor for future shipment. We are not familiar with a "water way" on Department of Transportation Harbors Division property that would flow into Pelekane Bay. The chain link fences were placed within the harbor because of problems with loitering and vandalism by members of the public at the harbor after dark.



Momi Subiono
89-709 Lani kona Rd.
CC, HI 96704

R.M. Towill Corporation
420 Waiakamilo Rd. Ste. 411
Honolulu, HI 96817
Attention: Gail Atwater
Subject: More testimony for the Final EIS Commercial Harbors Master Plan 2020 for the island of Hawai'i
March 14, 2004

Dear Gail,

I'm writing to you again in regards to our phone conversation. The fact is, I would never work for a company like yours even if I did have a degree. My views would "still" be in the opposition of this project. I know you were just trying to make me feel comfortable talking to you. By telling me, "We should've hired you" but really I am not a materialistic person. I'm just a person concerned for my culture and our environment. Anyway, back to business. I told you that I talked to Alice Akau. She is an old resident of the area who said that they had tried several efforts to stop the first projects on Kawaihae Harbor but the Army Core of Engineers and the State of Hawai'i still continued on the developments on Kawaihae Harbor. It is evident to me that our old timers from Kawaihae "did" speak out. We are once again speaking out island wide. Enclosed, are more petitions for your final EIS.

Alice Akau's family home was where the fuel tanks are stored now. Across the street from the restaurant. She said that, "one day, her grandfather and grandmother were asleep in their family home when a tidal wave hit. It carried the family home across the street where the restaurant is today." Now, imagine that same scenario happening today! It is a horrifying thought. The irreversible ecological damage that can come from all this is devastating. That is why I don't want you to store any fuel or oil on the Pelicane Lands. The fuel across the street from the restaurant now is of great concern to me. I will have to ask the restaurant owners if they know the hazards that the Harbors fuel storage places on their business. They already said they wanted petitions.

I'm not a person who is against all development but can't we try to develop our island in an environmentally safe way? I don't feel that people in O'ahu should have authority over what happens on our island. I have seen the pollution that development causes in O'ahu because I grew up at Kane'ohe Bay. I do not want the same pollution to occur on this island. Please, print this letter and all the petitions in your Final Draft EIS for Commercial Harbors Master Plan 2020 for Kawaihae.

Very Sincerely,
Momi Subiono
Momi Subiono

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1	Jenny Palatin	36 Akaka St. Hilo HI	935-7414
2	Jason S. Kaka	PO Box 22 Kakaia HI 96750	331-7289
3	Gary Sinae	Box 91 Kapaemahu HI 96726	939-7067
4	Ray Leonard	PO Box 15 Kapaemahu HI 96725	829-5180
5	Wendy Young	Box 7517 Kapaemahu HI 96743	885-7019
6	Imogene D. Owe	PO Box 10615 Hilo HI 96721	955-1901
7	Heidi Klemmings	P.O. Box Kapaemahu HI 96743	887-1461
8	Lois L. Luster	2303 Kapaemahu HI 96743	887-1461
9	Pauline McAlenny	PO Box 255 Kapaemahu HI 96750	323-3680
10	Carl Oht	49-3880 Wai Nalo St. Hilo HI 96720	883-3204
11	James W. Kaka	P.O. Box 1228 Hilo HI 96721	967-1236
12	James W. Kaka	PO Box 1236 Kapaemahu HI 96743	967-1236

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
	Randy Botti	305 KAMAHAMUA AVE #117 HIL, HI 96720	935-4070
	LAUREN LEE LO	P.O. BOX 112 K.M.H. 96720	322-770
	Abbot Galeher	P.O. Box 463 Hualala HI 96725	331-8092
	Kevin Luning	P.O. Box 1570 Kawaihae HI 96750	329-40
	MARK EVANS	P.O. Box 4209 PAHOA HI 96778	965-912
	Bob Beebe	P.O. Box 2046 KAWAHAHI HI 96740	
	Brandon Bruce	77-6503 Seaview Cir Kailua Kona HI 96740	
	Tommy Wynn	P.O. Box 5608 KONA, HI 90745	
	Afa Tutuola	P.O. Box 2161 Pahoa HI 96778	
	DAVID DAWSON	P.O. Box 2991 KAMUELA, HI 96743	
	Chad Dunbar	P.O. Box 2047 KAMUELA, HI 96743	
	Rise Ramos	15-04 Lilipuna Rd. Kawaihae HI 96744	240-212

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#	Name	Address	Phone #
	Koda Saday	P.O. Box 243 Kamuela HI 96743	885-6896
	Menny Virgilio	P.O. Box 1618 Hilo HI 96721	965-7246
	Ralph Leano	P.O. Box 575 K.K. HI 96745	326-2009
	MEL PAROLE	72-1029 Ahulani St Kailua Kona	325-6602
	Leo Santimer	75-312 Huenia St K.K.	326-1440
	Mark Collins	2180 Kalamauke Ave.	961-3842
	JOHN BAHR	2180 KALAMAUKE HIL	961-3842
	JANET THOMAS	P.O. Box 4522 Hilo HI	965-969
	JIM ELLIOTT	74-5603 Aupia St K.K. HI 96740	989-1457
	Margaret Gauthis	81174 Kaiminani Pr Kona	960-3967
	Geri K. Lee Hong	P.O. Box 4091 Hilo 96720	982-8813
	DONDALE MR HAGUER	P.O. Box 2127 Kawaihae HI	862-1232
	JOSEPH PIERSON	P.O. Box 1125 Kamuela HI	885-4321

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#	Name	Address	Phone #
	Danilo C. Lindsey	P.O. Box 1570 Kealahou, HI 96750	322-3672
	Beth Granger	40 Box 4854 Kaneohe, HI 96745	325-3025
	STEVE OLSON	P.O. Box 527 KAPAHA, HI 96755	889-5831
	Mimi Shirogami	90 Box 1815 Kaneohe, HI 96743	555-527
	Maria Walea	17 " " 1523 Kaneohe, HI 96743	967-727
	Melissa Soares	P.O. Box 384907 Waikoloa, HI 96738	
	Billy A. Nakamura	P.O. Box 384892 Waikoloa, HI 96738	
	Mamoru M. Mamiya	P.O. Box 1408 Hanalei, HI 96721	
	Kathy Katoaka	P.O. Box 384111 Waikoloa, HI 96738	
	R. Maria Reynolds	P.O. Box 385094 Waikoloa, HI 96738	
	Nichelle Peleholani	P.O. Box 2883 Kaneohe, HI 96743	
	Ethel Robertson	P.O. Box 244 Pāpāhā, HI 96780	
	JOE VERECE	P.O. Box 6468 Hilo, HI 96720	

Please send all petitions to the State of Hawai'i. Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
	M. Whitehead	P.O. Box 1121	808-885-8729
	Natalie Juan	P.O. Box 885 Kaneohe, HI	808-885-0650
	Jasmine Juan	" " "	" " "
	William W. Dixon	P.O. Box 44634 Kaneohe, HI	383-8009
	Jon Roca	P.O. Box 43 Hanalei, HI	889-6911
	Ashley Morris	P.O. Box 545 Kapaau, HI	889-0525
	Brian Hansen	P.O. 1555 Kaneohe, HI 96743	HI/P
	Alana Tanton	Box 384892 Waikoloa, HI 96738	883-09
	Uma Kuch	Box 884 Kaneohe, HI	889-5831
	LILUA PAPA	68-3883 Lua Kula St * 200 Waikoloa, HI 96738	883-9661
	TED LINDSEY	Box 834 Kaneohe, HI 96743	885-5087

Please send all petitions to the State of Hawai'i. Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

420 Wai'aleale Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
eMail rmc@hawaii.com



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Ms. Momi Subiono
May 15, 2001
Page Two

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn
Soma, Harbors Planner at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

May 15, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

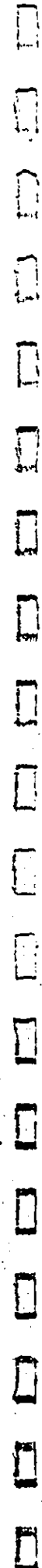
Dear Ms. Subiono:

Thank you for your letter of March 19, 2001, addressed to R.M. Towill Corporation, with
regard to the above-referenced Draft Environmental Impact Statement (DEIS).

Concerning your conversation with Alice Akau of Kawaihae, please refer to our response
to your undated letter received by the Department of Transportation between March 9
and 19, 2001.

With regard to your concern about the liquid bulk terminal, it will not be located in the
Pelekane lands but rather in the coral stockpile area. The terminal will be developed to
comply with strict Federal and State environmental requirements for construction and
containment.

Harbors Division will make every attempt to develop Kawaihae Harbor in an
environmentally sensitive way and ensure that all applicable laws and regulations are
followed.



Moni Subiono
89-709 Lani Kona Rd.
Capt. Cook, HI 96704

State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813-5097
Attention: Mr. Glen Soma

Dear Mr. Soma,

I'm writing to you about the public meeting you had at the Old Airport in Kona about the Master Plan for Kawaihae and Hilo Commercial Harbors 2020 in 1998. I am requesting that you schedule two more meetings on the matter. One in Kawaihae and one in Kohala. I feel the Community will be able to speak out to stop this project. They will speak out on the matter as we have informed many Community members on the so called Harbor Improvements. You will be receiving more petitions on the Communities opposition to the project. The people have stated to me that they knew nothing about the development. All petitions must go in the Final EIS. You will receive alot. Call Alwaker called me to find out exactly what I am telling the public. I told her, "the truth". That you (The DOT) plan to store hazardous chemicals on our Coded Lands. You plan to pour cement over our beloved beach between the LST ramp and the fishery (which is covered with silt and dead because of the construction you have been doing in the area). You are perpetuating the killing of the reef with your break wall that you spent millions of taxpayers dollars on which will be a money pit because the wall is already eroding. Keeping the people from gathering recreation, stewarding the land, and beach access because you plan to bring heavier equipment into the area which poses a threat to human life. I feel strongly that you should have the public meeting at Kawaihae on a Saturday so the Community voice can best be heard. I would like a prompt response to this letter. By March 30, 2001.

Very Sincerely,

Moni Subiono

Moni Subiono

420 Wai'anae Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
eMail info@rmtowill.com



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May 15, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your letter undated letter which was received by the Department of Transportation on March 19, 2001 in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

With regard to your comment about "the public meeting held at the Old Airport in Kona about the Master Plan for Kawaihae and Hilo Commercial Harbors 2020 in 1998," the Department of Transportation provided opportunity for discussion and input on the development of the 2020 Master Plan through its year-long collaboration with User Groups. The 45-day comment period for the above-referenced DEIS has provided an additional forum for the public to react to the Hawaii Commercial Harbors 2020 Master Plan improvements. Further, copies of the DEIS were provided to local newspapers West Hawaii Today and Hawaii Tribune Herald. Articles appeared in West Hawaii Today on March 13 and April 12 concerning the Hawaii Commercial Harbors Master Plan, further informing the public of the Island of Hawaii about the development plans. We also noted that you wrote a letter to the editor of West Hawaii Today that was published by the newspaper on March 27, 2001.

All petitions received during the DEIS public comment period will be published in the Final Environmental Impact Statement.

With regard to your comments about the content of the plan, you are correct that a liquid bulk terminal is planned for ceded lands. Such lands are provided to the State of Hawaii for public uses such as essential harbor infrastructure. The Department of Transportation pays the Office of Hawaiian Affairs for the use of those lands. You are correct that the 2020 Master Plan envisions construction of an additional pier along the shoreline

Ms. Momi Subiono
May 15, 2001
Page Two

between the LST ramp and the fisheries area. The LST area, however, is not slated for development by the U.S. Army during the 20-year planning period and will continue to be available to the public as it is today for recreational use subject to safety considerations and the military's use of the area for loading and offloading.

The "breakwall" (breakwater) most recently constructed in the Kawaihae Harbor area was for a small boat harbor which is under the jurisdiction of the Department of Land and Natural Resources. The area is therefore outside the scope of the 2020 Master Plan for the commercial harbor at Kawaihae and outside the jurisdiction of the Department of Transportation. With regard to access to the harbor by the public for "gathering, recreation, stewarding the land and beach access," Kawaihae Harbor is first and foremost a commercial harbor facility. Despite this primary emphasis, the Department of expects to continue its practice of allowing public access to undeveloped areas of the shoreline within the commercial harbor boundaries. Safety regulations in effect today are intended to protect human life and will continue in the future.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

Momi Sublono
HC-1 # 16
CC, HI 96704
1 (808) 328-8939

Eric Guinther
45-309 Akimela St.
Kane'ohe, Hawai'i 96744
Dec. 4th, 2000

Aloha Mr. Guinther,

I'm writing to you in regards to the study you did on the Kawaihae Environmental Impact Statement for the Harbor so called improvements 2020.

I am writing to you to urge you to study the ocean of the area thoroughly before you publish your report on the fauna of the area. I read the EIS for the Harbor and it states that there are no endangered species in the area. I disagree with this immensely and I and other people of the Community of Hawai'i would like you to do another study on the ocean surrounding the area of Kawaihae. The subjects I'd like you to study are:

1.) Fish spawning in the Harbor and the effects of the extra pollution in the Harbor that this project will create on the fish in Kawaihae. Including sharks.

2.) I'd like you to especially study these types of shells not found on any other beach but the one that will be destroyed by the Harbor revisions.

A. Turbidae	N. Anachis Miter
B. Leptothya Verruca	O. Euplicea Varians
C. Turbo Sandwicensis	P. Mitrella Margarita
D. Strombidae	Q. Helicinus Variegatus
E. Strombus Maculatus	R. Melampus Castaneus
F. Cypraea	S. Schizomys Irregularis
G. Cypraea Annulus	T. Haumea Juddi
H. Cypraea Caputserpentis	U. Kupe's shells
I. Cypraea Granulata	
J. Cypraea Helvola	
K. Cypraea Isabella	
L. Cypraea Moneta	
M. Cypraea Sulcidentata	

All these shells are used by shell gatherers for lei making and have been used by the Hawaiian People since the ancient days. We are alarmed that they have been overlooked on the EIS and we feel that the bigger boats coming in the area will have a negative impact on the survival and reproduction of these shells and we are demanding that you go beyond the books and actually get in the waters of Kawaihae and study these shells. These shells are a precious resource for us and we would like the right to continue gathering the shells that wash upon the shore. We are also spiritually tied to these shells and feel they are part of our culture.

The seaweed in the area and how the extra pollution will effect it's growth and reproduction.

Archaeological Sites in the water. Their is a shark helau on the opposite side of the harbor and extra silt and extra environmental changes that this project will have that can jeopardize our cultural archeology.

I am hesitant to send you my sample of shells because I want you to come back to this island and really study all of these creatures and archeology more thoroughly before these creatures become extinct forever. If you would like the samples I would like to meet you on the beach at Kawaihae and I will give them to you their. The reason I am not sending them is mainly because I don't want you to say you studied them but did not enter the water to do so. Please get back to me on this. It is very important.

Very Sincerely,

Momi Sublono

Momi Sublono
HC-1 #16
CC, HI 96704
1 (808) 328-8939
Teacher of Hawaiian
Studies and
Environmental
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Cultural Preservation

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Ms. Momi Subiono
May 15, 2001
Page Two

May 15, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement (DEIS)

Dear Ms. Subiono:

Thank you for your letter of December 4, 2000, which was addressed to Mr. Eric Guinther of AECOS, Inc. The firm AECOS, Inc. was retained to perform the Review of Water Quality and Biology in Kawaihae and Hilo Harbors for the Harbors 2020 Master Plan Implementation EIS. Their full report is published in the DEIS. Your letter provided comments on preliminary disclosure information contained in the Environmental Impact Statement Preparation Notice of October 2000. You resubmitted your December 4, 2000 letter to AECOS, Inc. to R.M. Towill Corporation for inclusion in the Final EIS.

With regard to your comments on endangered species, the DEIS discloses that the marine biologist surveying the area observed a threatened green sea turtle *Chelonia mydas* in Kawaihae Harbor. These turtles currently coexist with commercial shipping and pleasure boating activities in the harbor without incident. In addition, the DEIS contains specific information about how any threat to the safety of these turtles will be mitigated during construction activities. The DEIS states, "Because of the occasional presence of a threatened species within both harbors, Harbors Division will maintain close coordination with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service during project planning and construction. The threatened green sea turtle will be protected from dredging and pier construction activities through the use of at least one siltation curtain at each harbor location. The flexible fabric curtain will create a barrier from construction, preventing the turtles from entering an area of potential harm."

With regard to spawning of marine life within Kawaihae Harbor, AECOS, Inc. "has not heard before that the harbor is a nursery for fish or sharks. It is possible that because the harbor provides sheltered conditions along a coast with few large bays, juvenile hammerheads are attracted here. It is unlikely that the proposed changes at Kawaihae Harbor would alter conditions sufficiently to reduce use of the harbor's waters by either turtles or sharks. The harbor resources most attractive to these marine creatures are going

to be along the outer margin of the harbor" where shipping does not occur. Further, the DEIS discloses that the area where the green sea turtle *Chelonia mydas* was observed contains a benthic community limited to species prevalent along pilings. Since this area is slated for the construction of mooring dolphins, development will have little impact to marine life because the current macrobiota exist in that environment already.

With regard to the study of "shells not found on any beach but the one that will be destroyed by the Harbor revisions," the above-cited water quality and marine biologic survey characterized the kinds of benthic communities present as indicated by the more obvious creatures living there, emphasizing those areas designated to undergo the greatest physical alterations under the Hawaii Commercial Harbors 2020 Master Plan. AECOS, Inc., comments: "The report by Momi Subiono on various Hawaiian marine mollusks is very interesting, but not specific in its treatment to species found in Kawaihae Harbor."

With regard to your comment that "the shells have been overlooked in the EIS," we concur that the shells were not specifically mentioned in the preliminary disclosures contained in the Environmental Impact Statement Preparation Notice, to which your December 4, 2000 response. You also state "we would like the right to continue gathering the shells that wash upon the shore." The shells are covered by DEIS under discussion of marine biology. For example:

- On page 3-32, the DEIS states: "Pier and terminal construction along the current shoreline of the coral stockpile will remove or cover small mollusk shells commonly found in this area. However, the U.S. Army LST/LSV ramp, in which these shells have been observed, will remain available to the public except when explosives are being loaded and offloaded, a use restriction that is currently in force and will continue for safety reasons." Please also note that on page 2-20 of the DEIS that development of proposed Piers 3 and 4 in the coral stockpile area is not slated until the year 2010 under the Hawaii Commercial Harbors 2020 Master Plan.
- On page 3-30, the DEIS states: Also observed in this area are small mollusk shells of the species which appear to be gathered by one individual. According to wildlife biologists at the U.S. Fish & Wildlife Service, these mollusks are common and were most likely dredged from former coral reefs as opposed to something that grows there now (Personal Communication, Kevin Foster, Wildlife Biologist, U.S. Fish and Wildlife Service (USFWS), 2000). According to the head malacologist (shell expert) at Bishop Museum, there are no threatened or endangered intertidal species in the Hawaiian Islands (Personal Communication, David Cowey, Ph.D., 2000). Therefore the mollusks found at Kawaihae Harbor are not considered threatened or endangered.

Ms. Momi Subiono
May 15, 2001
Page Three

- On page 3-34, the DEIS states: "Although small mollusk shells will be removed from project areas, the U.S. Army LST/LSV area will provide continued gathering opportunities in the commercial harbor area."

With regard to "archaeological sites in the water," the shark heiau is outside the scope of the commercial harbor at Kawaihae. Any drainage problems that may have resulted in silt deposits did not originate from Kawaihae Harbor as the harbor is "downstream" rather than "upstream" from this area.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division
Eric Guinther, AECOS, Inc.

Sincerely,
Moni Subiono
Moni Subiono

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#	Name	Address	Phone #
	R.D. TREVINO	P.O. Box 451 Pepeekeo, HI. 96783	964-8659
	H.K. MAKIWA	RR3 Box 3459 Pahoa, HI. 96778	326-3769
	Ernest & JoAnn Reyes	79-5182 Kuni Pl Kailua Kona Hawaii	96740 #295031
	M.E.K. Maikui	Bx 155 Kamehameha	Same
	Lawson: Kristina Lopez	Po Box 6927 Kamehameha HI 96743	885-2053
	B. Kaimila Chismar M.D.	P.O. Box 1723 Hanalei, HI. 96727	775-9003

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline! or email: momishelle@hotmail.com

420 Wai'anae Road
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Honolulu, Hawaii 96817-4941
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Fax 808 842 1937
email: mtowill@hawaii.com



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Construction Management

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

May 15, 2001

Ms. Momi Subiono
HC-1 #16
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your letter dated March 22, 2001, addressed to R.M. Towill Corporation, with regard to the above-referenced Draft Environmental Impact Statement (DEIS).

With regard to shell pickers, to date no one else has provided written comments on any shells that may be found in the coral stockpile area of Kawaihae Harbor. The shells found on the coral stockpile are not under any federal protection as threatened or endangered species.

Concerning fishing, it has been the longstanding practice of Harbors Division to allow recreational fishing at Kawaihae Harbor and Hilo Harbor, subject to safety requirements in effect at the harbor today. This is explained in Section 4.6 of the DEIS.

We acknowledge receipt of the petitions attached to your letter of March 22, 2001. In accordance with public review procedures for environmental impact statements, we will publish them along with your letters of March 9 and March 19, 2001.



Momi Subiono
89-709 Lani Kona Rd.
Captain Cook, HI
96704
March 22, 2001

State of Hawai'i
Department of Transportation
Harbors Division
Attention: Glen Soma
869 Puuhonua St.
Honolulu, HI
96813-5097

Dear Glen, and Brian,

I am once again writing to you in regards to a phone conversation with Gail Atwater on March 09, 2001.

Anyway, she stated that I was the only shell picker that has been writing. To tell you the truth, many of those signatures came from shell pickers and you will receive letters from some of them as well. They don't have to identify themselves as shell pickers. Most of the petitions that I am personally sending you came from walking up and down the very beach in question. Kawaihae Small Boat Harbor between the LST ramp and the dead fishery, and at Pua ka ilima surf park.

Fishermen also have been asking for our petitions as this project can cause irreparable environmental damage to their livelihood. They are very eager to receive more information on this. I think next, I will send them all a copy of the map of the plans the Department Of Transportation has for Hilo Harbors. I'm sure they will be very interested in all this. I am sending you two more pages of petitions from the Nalua O Pu'uohola Heiau. They are the group that does the ceremonies at the heiau. They seemed very concerned about the situation. Please make sure this information gets in your Final EIS.

This is letter along with the letters dated March 09, 2001, March 19, 2001 I am submitting once again for your Final EIS. I also resubmitted the letter dated December 04, 2001 as it did not go in your Draft EIS. Maybe you lost it? Thank you again for your attention on this.

Sincerely,



Momi Subiono

420 Wai'aleale Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1972
eMail rmowill@towilltr.com



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Construction Management

May 15, 2001

Ms. Momi Subiono
HIC-1 #16
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

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Thank you for your letter dated March 22, 2001, addressed the Department of Transportation, with regard to the above-referenced Draft Environmental Impact Statement (DEIS).

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Ms. Momi Subiono
May 15, 2001
Page Two

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

INVEST	DATE	PRICE	
BILL	1000	1000	
TOTAL		MAR 26 2001	RATC
		(1000)	

Dear Mr. Kozzi:

I own a house very near Hilo Pier (489 Oceanview Drive), a house bought with my veteran's pension, a house I've spent my life savings on, savings earned by serving this country well (as have many of my neighbors). And we are very disturbed by the thought of expanding the traffic at Hilo Pier (especially noisy barges that unload oil for Kona power plants, plus barges that unload Kona-bound cargo, shipments that *should be unloaded at Kawaihae Harbor*).

Therefore our main point and mission is this: to enact the crucial need for a shift of ships to Kawaihae Harbor, thereby easing any threat to the peace and safety of tranquil Hilo with unneeded Pier traffic (all vessels with Kona-side cargo). Hence we sensibly develop Kawaihae Harbor to ease Hilo Pier's burden. This is the community's plan.

Yours in truth and service,

Jesse C. Wolf
Jesse C. Wolf

420 Wai'aleale Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
eMail res@hawaii.towill.com



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Mr. Jesse Wolf
May 15, 2001
Page Two

May 15, 2001

Mr. Jesse C. Wolf
489 Ocean View Drive
Hilo, Hawaii 96720

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Mr. Wolf:

Thank you for your letter dated March 23, 2001 in which you offered comments on the above-reference Draft Environmental Impact Statement.

Your letter speaks of the need to "sensibly develop Kawaihae Harbor to ease Hilo Pier's burden." The Hawaii Commercial Harbors 2020 Master Plan concurrently considered development plans for both of the commercial harbors on the Island of Hawaii (Hilo Harbor and Kawaihae Harbor). The plan was formulated in this way because of the acknowledged interdependence of the two harbors in serving the island's shipping needs. The methodology for planning included quantitative analysis of future demand for cargo at each of the harbors. In this way, the Department of Transportation, Harbors Division can provide the appropriate facilities in each location.

With regard to the barges that offload fuel at Hilo Harbor for use in Kona, the 2020 Master Plan includes construction of a new liquid bulk terminal (storage) facility at Kawaihae Harbor which will receive bulk fuel shipments from ships in that harbor. This will replace the current system of offloading fuel from interisland barges in Hilo Harbor and trucking it across the island to liquid bulk storage facilities at Kawaihae Harbor.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga
Project Manager

Cc: Department of Transportation, Harbors Division



Kanoelehua Industrial Area Assn., Inc.
820 Pūlani Street, Suite 201 • P.O. Box 4742
Hilo, Hawaii 96720
Phone (808) 961-5422 • Fax (808) 935-9740

March 27, 2001

R.M. Towill Corp.
C. Koga
420 Waiakamilo Road, Ste 411
Honolulu, HI 96817

Dear Sir,

This is in reference to the article in the Hawaii Tribune-Herald regarding the expansion of Hilo Harbor.

Requesting more information on the EIS draft to be forwarded to the KIAA office.

If you have any questions, please feel free to contact KIAA at 961-5422.

Thank you,

Marlene Salmo

Marlene Salmo
KIAA

WES	RTS	
REF	MM	
RTT	Entry	BRT
REC'D MAR 28 2001		
CITE		

420 Waiakama Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1113
Fax 808 842 1937
email rm@towill.com



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April 6, 2001

Ms. Marlene Salmo
Kanoelohua Industrial Area Association, Inc.
820 Piilani Street, Suite 201
Post Office Box 4742
Hilo, Hawaii 96720

RE: Hawaii Commercial Harbors 2020 Master Plan Draft Environmental Impact Statement

Dear Ms. Salmo:

Thank you for your letter of March 27, 2001 regarding the above-referenced Draft Environmental Impact Statement. As explained to you on the telephone, the Hilo Public Library has a copy of the document which is available to the public.

Very truly yours,

Gail W. Atwater, AICP
Senior Planner

cc: Glenn Soma, Department of Transportation, Harbors Division



Chester Koga
c/o R.M. Towill Corp., 420
Waialae Rd. Suite 411
Honolulu, HI 96817

March 26, 2001

RES	KTS
R-F	MM
B-T	BRT
MAR 28 2001	
BRT	

RE: PORT OF HILO EXPANSION

I have read, with grave concerns, the four recent articles in the Tribune Herald by some officials, who most likely don't live in this area, wanting to build a larger port in Hilo. I have no doubt in my mind that such a project would irreversibly change the lifestyle of all the local Hilo people for the worse, especially for the residents of Keaukaha and Banyan Drive.

Do those officials, so willing to drastically change our lifestyle realize that each giant tour ship of today carries the equivalent number of people of two or three former models? Since the increased docking of those ships into the Hilo harbor for the past two years we are already experiencing bumper to bumper car traffic, increase noise pollution and air pollution. Even more alarming is the change in behavior of many drivers. The aloha spirit has disappeared; they have become much less courteous and patient.

Every time one or two ships are in port, one can count up to five large Robert's Hawaii tour buses line up in a procession going to or coming from the port of Hilo. In addition there are the other large tour bus companies: Jacks' Tours, Polynesian Adventure, Green Travel and Tour using the same streets back and forth. Six additional new names have appeared on tour buses within the short period of two years.

Kalaniana'ole from Kamehameha to the Hilo harbor has always been a busy street. Each morning till evening there are the necessary processions of 18 wheel trucks going from or to the port carrying their cargo. Adding more lanes to the existing ones will only be the beginning of the irreversible changes that the people in Hilo will have to face in their lifestyle. The laid back way of life will be replaced by the hectic and often rude attitude found in so many cities. These are cities with more traffic, more noise, and more people. Hilo has still a chance not to go there.

My family and I have already experienced the drastic changes to our way of life in a formerly small town in California. There, some merchants and county and state officials with incredible SHORTSIGHTEDNESS brought loads and loads of tourists, diesel buses and crowded shopping malls and streets. There was also new construction of resort hotels, and the inevitable traffic congestion and air pollution and overcrowding. To group of "advisers" only focused on bringing more money to a few of the local tourist merchants. More money came, but most local people who had experienced a more peaceful time moved out repelled by the overwhelming drastic changes in their lifestyle. My husband and I moved to Hilo. We found a beautiful little town, full of green parks, and people who seem to want to preserve the natural beauty of this area and its slow way of life.

Please, before you embark in such dramatic changes as to enlarge the tourist port in this little town with a history of tsunamis, consult with all the people who will be directly affected. Do not allow yourself to be influenced by a quick money fix, or by people who live somewhere else.

I am sending this letter to all officials that might influence the Port of Hilo expansion. Having experienced the "future" of Hilo in another place I am pleading with you- do not ruin this beautiful rural town.

Sincerely,

Elfriede R. Wilkins

Elfriede R. Wilkins
20 Akepa Street Hilo, HI 96720

420 Waiakama Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1137
eMail rmtowill@hawaii.rr.com



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Ms. Elfriede Wilkins
May 15, 2001
Page Two

We cannot comment on applicability of the experience you had in California to the future of Hilo. However, the Hawaii Commercial Harbors 2020 Master Plan was developed as an islandwide plan because of the interdependence of the two commercial harbors at Hilo and Kawaihae. The plan ensures that the current harbor traffic that supports west Hawaii will be transferred to Kawaihae Harbor in the future.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner at 587-2503.

Very truly yours,

Charles T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

May 15, 2001

Ms. Elfriede Wilkins
20 Akepa Street
Hilo, Hawaii 96720

Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement

Dear Ms. Wilkins:

Thank you for your letter dated March 26, 2001, which provided comments on the above-referenced Draft Environmental Impact Statement, entitled "Port of Hilo Expansion."

The Hawaii Commercial Harbors 2020 Master Plan was a collaborative effort between the Department of Transportation, Harbors Division and business and community leaders who spent more than one year developing the Hawaii Commercial Harbors 2020 Master Plan. This DEIS is another means of obtaining broader public input on the plan.

Hilo Harbor is considered essential infrastructure. The State of Hawaii is responsible for ensuring that future demand for shipping will be accommodated. With regard to the capacity of our ships, we recognize that ships today have greater capacity. However, the passengers are generally only on the island for one day and leave before evening. Their spending provides an important economic boost to the economy of the Hilo area. In addition, foreign cruise ships are not permitted to leave any garbage or sewage in Hilo.

With regard to your concern about tour buses entering and leaving the harbor, the Hawaii Commercial Harbors 2020 Master Plan provides additional access roads leading from existing roads into the harbor. One access road is planned to enter a new passenger terminal and another, which has already been constructed, will lead to the overseas container terminal. Breaking the traffic up between three access roads will allow vehicles such as buses and trucks to go straight to their destinations within the harbor. In addition, DOT-Harbors Division will work with DOT-Highways Division to make adjustments to the Hawaii Long Range Land Transportation Plan highway projects to ensure acceptable traffic flow in the harbor vicinity.

420 Westland Road
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eMail rmt@rmto.com



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May 15, 2001

Mr. Edward T. Teixeira
Vice Director of Civil Defense
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement

Dear Mr. Teixeira:

This is in response to your memorandum to Mr. Glenn Soma of the Department of Transportation, Harbors Division, dated April 9, 2001, which provided comments on the above-referenced Draft Environmental Impact Statement.

The Department of Transportation Harbors Division will ensure that an additional siren will be provided when harbor development expands into the coral stockpile area which you refer to in your letter as the "Pelkane section" of the harbor. Please be advised that the so-called Pelkane lands are planned to be retained as a buffer zone between harbor development and the Puukohola Heiau National Historic Site under a cooperative agreement between Harbors Division and the National Park Service. This is illustrated in Figure 22 on page 4-13 of the DEIS.

Thank you for your comments.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division



Harry Kim
Mayor

DRAFT EIS
April 10, 2001
Page 2 of 2

Desai K. W. Lee
Director

Jiro A. Samada
Deputy Director



County of Hawaii

DEPARTMENT OF PUBLIC WORKS
25 Airport Street, Room 201 - Hilo, Hawaii 96720-4151
(808) 941-4311 • Fax (808) 941-4439

April 10, 2001

Mr. Glenn Soma
Department of Transportation
Harbors Division
79 S. Nimitz Highway
Honolulu, Hawaii 96813

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT
HAWAII COMMERCIAL HARBORS 2020 MASTER PLAN**
TMK: 2-1-07 & 2-1-09; Hilo Harbor
6-1-03; Kawaihae Harbor

We acknowledge receipt of your letter concerning the subject matter, and provide you with our comments as follows:

1. We cannot make an adequate review of this EIS without a narrative or plan layout of the actual harbors 2020 Master Plan. It was particularly difficult to determine what is the future build-out on the easterly side of Hilo Harbor.
2. If the Harbors transport their shipping and construction wastes to the West Hawaii Landfill, and attempt to dedicate an area for recycling product storage for eventual shipment off the island, we have no concerns for solid waste disposal. We will not allow any harbor dredged material at the Hilo Landfill.
3. We do not agree that a single access to Hilo Harbor from Kalanianaʻole Street would be adequate until year 2020 (ref. Sec. 3.5.2). Presently Silva Street is at or approaching LOS "F". The cross traffic intermixing with the truck traffic (e.g., HT&T trucking yard) is causing a problem. The proposal for additional access roads needs to be considered now.

The projected increase in traffic along Kalanianaʻole Street will affect the intersections of Kea Street and Silva Street. Signalizations may be warranted at these intersections. Signalization of Kea Street may mitigate the problems of Silva Street by redirecting traffic away from the Silva Street intersection.

Should there be any questions concerning this matter, please feel free to contact Mr. Casey Yanagihara in our Engineering Division at (808)961-8327.

Casey Yanagihara
Galen M. Kuba, Division Chief
Engineering Division

CKY

copy: OEQC (G. Salmonson)
R. M. Towill Corporation (C. Koga)

420 Waiakama Road
Suite 411
Honolulu, Hawaii 96817-0941
Telephone 808 842 1133
Fax 808 842 1937
eMail rmtowill@towill.com



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May 15, 2001

Mr. Galen Kuha
Division Chief
Engineering Division
County of Hawaii
Department of Public Works
25 Aupuni Street, Room 202
Hilo, Hawaii 96720-4252

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Mr. Kuha:

Thank you for your letter of April 10, 2001 in which you provided comments to the Department of Transportation on the above-referenced Draft Environmental Impact Statement (DEIS).

Concerning your comment #1 regarding a narrative or plan layout of the actual harbors 2020 Master Plan, the 2020 Master Plan is a conceptual land use plan. With regard to your comment that it was "particularly difficult to determine what is the future build-out on the easterly side of Hilo Harbor," Figure 8, page 2-18 in the DEIS shows that the eastern boundary of Hilo Harbor consists of the harbor breakwater and the eastern shore of Radio Bay. West of the indicated Hilo Harbor property boundary is a University of Hawaii facility.

Concerning your comment #2 regarding solid waste, the Department of Transportation, Harbors Division will transport their shipping and construction wastes to the West Hawaii Landfill, and dedicate an area for recycling product storage for eventual shipment off the island, as stated in the DEIS in Section 3.11.2 on pages 3-42 and 3-43. In addition, the Harbors Division intends to dispose of dredged material from Hilo Harbor at the Environmental Protection Agency (EPA)-approved ocean dumping site, as stated in Section 2.5.6 on page 2-6 of the DEIS.

Mr. Galen Kuha
May 15, 2001
Page Two

Concerning your comment #3 regarding traffic, please note that Section 3.5.1 and Table 5 of the DEIS recognize that poor conditions (LOS F) already occur on Silva Street during peak hours. Mitigation of the existing problem, including widening of Kalanianaʻole Street, realignment of the intersection with Kubio Street/Silva Street, and signalization are potential mitigation measures; if the existing problem is mitigated, the single access is expected to be adequate for the volume of traffic expected in 2020. However, the provision of additional access roads to Hilo Harbor is recommended under the Hawaii Commercial Harbors 2020 Master Plan. You quoted page 3-12 of the DEIS as saying, "The traffic analyses indicate that a single access to Hilo Harbor from Kalanianaʻole Street would be adequate." This discussion continues as follows: "However, the harbor master plan indicates that additional access roads will be constructed to separate the access to differing functions within the harbor area. Intersection levels of service would be improved if additional access roads are provided." Please also see Figure 8, Hilo Harbor 2020 Master Plan Improvements, page 2-18, which shows the location of multiple access roads proposed to enter and exit Hilo Harbor. In addition, DOT-Harbors Division will work with DOT-Highways Division to make adjustments to the Hawaii Long Range Land Transportation Plan to ensure acceptable levels of service in the harbor vicinity.

With regard to cross traffic from H&T, use of a public street as part of a driveway or for maneuvering in and out of private property always has the potential to affect traffic. This will be considered in future planning by the Department of Transportation.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

Original Message
From: Momi Subiono
Sent: Saturday, April 14, 2001 11:24 AM
To: chesterk@mtawill.com
Subject: Momi Subiono

Aloha Chester,

I am requesting a copy of the Final Environmental Impact Statement for Hawaii Commercial Harbors Master Plan 2020. I would appreciate a copy as soon as it comes out. I am also wondering why no one had contacted me on the petitions I sent in so far. Have you received any from me. I want all my testimony and my supporters testimonies answered in writing and all petitions published in the Final EIS.

Aloha Momi Subiono
89-709 Lani Kona Rd.
Captain Cook, Hawaii 96704

4/16/2001

From: Chester Koga
Sent: Monday, April 16, 2001 1:32 PM
To: 'momi subiono'
Subject: Hawaii Harbors Final EIS

Ms. Subiono:

We are currently in the process of preparing the Final EIS. We expect that the final EIS will be available in July based on our current schedule. The petitions you reference have been received by the Department of Transportation and a copy provided to us. As these documents have been received in response to the Draft EIS, we will include them in the Final EIS.

Chester Koga, AICP
Project Manager
Reply to: [mailto:chesterk@mtawill.com]

Visit our web site at www.mtawill.com

420 Waiakamilo Road, Suite 411
Hirohola, Hawaii 96817 tel: 808.842.1133 fax: 808.842.1937

Momi Subiono
89-709 Lani Kona Rd.
Captain Cook, Hawaii
96704

R.M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817
Attention: Gail Atwater, Chester Koga
April 16, 2001

April 16, 2001

Dear Mr. Minaai and Mr. Soma,

I am writing to you in regards to Marilyn Kall of Mr. Minaai's office. From an email from Chester Koga, he stated that all petitions of opposition will be published in the Final EIS. Therefore, that tells me that you "have" received the petitions and signatures of others in opposition. Why then, does Mrs. Kall say that I am the only one in opposition? I know that is not true. We are resubmitting this packet of petitions. I have 28 pages altogether 332 signatures about 7 new pages of petitions paper clipped in the back. Please make sure all the petitions are in as testimony along with my essay, and all letters. We are getting copies of petitions that others signed and circulated. I am glad I am not the only one in opposition to the Master Plan 2020. I am also wondering why you have not gotten back to me on any of my letters. I thought you were supposed to answer "every" one of them.

I'd also like to point out that the area the EIS has stated as the designated grounds for Liquid bulk terminal, the Pelekane Lands is an irresponsible plan. It's that simple. Move it away from the ocean and away from the pristine waters of Kawaihae. We are requesting the the Hawaii County dump the General Plans for this island and start over again. The Community is going to ask that we plan again this time asking for the input of the Community.

Mr. Soma has stated to me that citizens were at the meeting. I heard the people listed as citizens were business people who couldn't possibly give good ideas of what the Hawaii Community actually wants because they are lead by one thing, "money". OHA is an entity of the state of Hawaii therefore, their hands are tied and they have to shut up and let it all happen. They have not helped on this issue either. So much for the betterment of all Hawaiians.

It does not matter to me that the beach between the LST ramp is a man-made beach. It is a fact that the area was traditionally a gathering area for fish. The Army Core of Engineers, destroyed the shell beach and this is what is left of it. We have reclaimed it by continuing to use it as a gathering area. We plan to preserve this whole area, Pelekane, Pua Ka Ilima, and the beach between the LST ramp and the fishery on the south end of the harbor.

Bush has just allocated 225,000 of Federal Funds for studies on "why the Kawaihae harbor was deemed "unusable" due to the massive winter waves that hit the breakwall posing a threat to the Cruise and Import ships behind this Hawaii Commercial Harbors Master Plan 2020 for Kawaihae Harbor. Why waste the money, give it to the teachers. You can do study after study but the bottom line is, you can't fight mother nature.

An elder of the area told me that a Hawaiian Fishpond was destroyed in order to do the first

development (Army Core of Engineers). This person said that the whole grounds of Kawaihae was "abundant" with life. The turtles would lay their eggs on the beach. From my understanding, by instinct, female turtles go back to the same beach they were hatched on to deposit eggs of their own. That beach is gone now. The Army Core of Engineers contributed to the fact that the turtle is an "endangered species". Now with out any regard for the Cultural significance past, present, and future the state of Hawaii Department of Transportation is continuing this effort to possibly cause the extinction of the Hawaii Species of Eupilia Varians, Mitrella Margarita, Anachis Miser, Cypraea, architectonidae, Turbo Sandwicensis, and many other shells. Here I have a list of the ones not in my essay. These are only a handful of the ones I find at the beach between the LST ramp and the fishery.

1. Neritidae family
2. Mitridae family
3. Marginellidae family
4. Turridae family
5. Tectibranchia family
6. Bursidae family
7. Cassidae family
8. Epitonidae family
9. Trochidae family
10. Umbonium family
11. Many varieties of rare cowries.

I would like a full report on the specific shells of these families included in your final EIS. The only way to do that is to get your oceanographer to actually get in the water and tell us if they are what the effects of pollution will have on these species.

I met numerous people who said they spent time on the Kawaihae shore in the past and people continue to use the shoreline to this day.

Very Sincerely,
Momi Subiono

Kawaihae Harbor expansion plans finds opposition

By BOBBY COMMAND/ West Hawaii Today

A South Kona woman said she has quit her job as a Hawaiian studies teacher to devote her efforts to stopping a planned expansion at Kawaihae Harbor.

Momi Subiono, 33, said she is spearheading a petition drive demanding bulk petroleum storage areas not be built as proposed in the Hawaii Commercial Harbors 2020 Master Plan.

The state Department of Transportation plans to spend \$150 to \$300 million for upgrades to Kawaihae and Hilo Harbors, which would take care of the Big Island's deep - draft harbor needs for the next 20 years.

State and petroleum company officials say a fuel farm at Kawaihae would make the distribution of fuel in West Hawaii more efficient as it would eliminate the need to truck it from Hilo, where it now is unloaded from fuel barges.

But the former Honaunau School teacher said that's not worth the risk of a potential spill or other disaster at Kawaihae. "This is a tidal wave zone," she said. "There would be massive environmental damage if a tidal wave hit."

Subiono said she is also defending the rights of those who use the man - made coral beach at the south end of the harbor.

"This is our beach," Subiono said. "We're going to fight for it."

The proposed expansion of the deep - draft harbor that serves West Hawaii would include a bulk petroleum cargo terminal, dry bulk terminals, cargo container terminal, passenger terminal and ocean research facility, military cargo terminal and access roadways.

The man - made beach would be wiped out by a proposed pier, and the large coral flats in back of the beach would become the interisland cargo terminal. The area makai of Makahuna Gulch would be converted to a petroleum storage terminal.

State officials say canoe paddlers, fishermen and swimmers should be able to keep using the harbor unless their safety is jeopardized. Pleasure craft, however, eventually will be banned from mooring in the commercial section of the harbor.

But Subiono said the crushed coral beach should not be taken away.

<http://www.westhawaii today .com/daily/2001/Apr-12-Thu-2001/news/news2.html>

4/13/2001

"A lot of the coastline is being closed off," said Subiono. "All communities need access to the shoreline, but where I live you need a key to get to the shoreline."

Subiono said those who live around the harbor and use it are not aware of what is taking place, and so she has asked for another round of public hearings. "The public is so uninformed," she said.

But Marilyn Kali, public information officer with the state Department of Transportation, said administrator Brian Minaai sees no need for further informational meetings because Subiono appears to be the only one who has objected to the plans.

Kali also said input was solicited at least six times in West Hawaii prior to the assembly of the master plan, and still is being accepted for the environmental impact statement.

Subiono said petitions, which have about 100 signatures on them, show she is not the only person worried about the expansion. She plans to give the names to the DOT.

"That's just what I got," she said. "Other people have petitions and I've told them to turn them into the state."

Kali said improvements at Kawaihae will serve the majority of West Hawaii residents.

"It makes more sense to have a fuel farm on the west side of the island," Kali said. "There is a 50 - 50 split for usage of fuel, and also of concern is the larger planes that want to come into the airport."

The state estimates 98 percent of all consumer items and raw materials that come to Hawaii flow through deep - draft harbors, making all the islands dependent on the facilities.

According to the master plan, the 73 - acre expansion of Kawaihae Harbor and the accompanying 42 - acre improvement at Hilo Harbor are vital to sustaining economic growth in Hawaii County, which has risen steadily since 1995.

The plan also points out a dramatic increase in cruise ship traffic and the lack of facilities to handle passengers. The state Department of Business, Economic Development and Tourism has projected as many as 500,000 cruise ship visitors by the year 2020.

Passenger facilities at Kawaihae would offer an alternative to cruise ships, which now anchor off Kailua - Kona and use shuttle boats to bring passengers to shore.

Dick Akana, vice president of Akana Petroleum, said having bulk petroleum shipped directly into Kawaihae would cut costs to consumers because the

<http://www.westhawaii today .com/daily/2001/Apr-12-Thu-2001/news/news2.html>

4/13/2001

gasoline would no longer have to be trucked to West Hawaii from Hilo.

Akana also said it would take many fuel trucks off the road, making accidents less likely and lowering the probability that fuel would have to be brought by some other method to West Hawaii should Hawaii Belt Road in Hamakua be blocked.

While Akana said he understands Subiono's fears of an accident at the harbor, he added any new fuel farm at Kawaihāe would have to be built to Environmental Protection Agency standards.

Kali said the alternative is not to expand, "but that won't be satisfactory as growth continues and the number of planes increase."

While Subiono said she is not against progress, "I am against development that is irresponsible, and I don't want to trade economic progress for ecological and cultural responsibility."

Subiono, who was raised in Kaneohe but is a member of the Kauaia family of Kohala, said she saw how the Windward Oahu bay was degraded by runoff from development during the 1960s and 1970s.

"It was not pretty," Subiono said. "Maybe that's why I'm doing this."

boomand@westhawaii.com

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<http://www.westhawaii.com/daily/2001/Apr-12-Thur-2001/news/news2.html>

4/13/2001

Kawaihāe Archeological sites at risk of being harmed by a fuel or oil spill, caused by tidal wave, earthquake or fire which this area is known for. We oppose this in the Hawaii Master Plan Commercial Harbors 2020. This picture shows Pu'ukohola Heiau, Maoli'ani Heiau and in these waters in Pelekane the submerged and silted over (due to Army Corps of Engineers first development). We oppose this changes to this Harbor because your plans can cause irreversible environmental damage to this area.



(below) Another view of Pelekane beach. The breakwall has hindered shark migration through the area. Hale O Kūpuni is a shark heiau that mo'olelo (true stories) are still occurring which would show the continuity of the historical significance of the area. The breakwall is also contributing to the stagnancy of the waters within Pelekane bay.

We "oppose" further desecration of this area as well as the areas shown in other pictures that we are sending.



Pictures by Momi Subiono
Testimony for opposition of Kawaihāe Commercial Harbors Master Plan 2020
To be printed in Final Environmental Statement in opposition to the project.

Kawaihae Break wall (below) and Beach between LST ramp and fishery(at the bottom of page.)



This is the break wall (above) I speak of that is contributing to the stagnant waters in Pelekane Bay and has hindered the migration of sharks in the area. The break wall is also eroding on the corner which cannot be seen on the above picture. I will try to get a better picture.



This is the beach in Kawaihae, between the LST ramp and the fishery. This is our beach for shell collecting where young children learn to swim. Your plans call for pouring cement on this whole beach and turning this area into a dock. This is the beach I would like to see preserved for the Community to use eternally. The petitions are also opposing the development in this area of Kawaihae beach in the Hawaii Commercial Harbors Master Plan 2020.

Pictures by Momi Subiono 3/12/2001
Testimony for opposition of Kawaihae Harbors 2020 Master Plan
To be printed in final Environmental Impact Statement in opposition to the project.

We would like to know why old cars are stored in this area. Is this a designated dump? This is where you plan to store petroleum and oil in the future. Behind the cars is Pelekane Beach area. This is the area of questions. It is too close to the sea, and poses a threat to the ecosystem.



At one time this noted by the Draft EIS, as the fishery (below) was at one time, open to the view of ocean. The first development was done by the Army Core of Engineers and blocked off the mullets spawning grounds.



Pictures by Momi Subiono 3/12/2001
Testimony for opposition of Kawaihae Hawaii Commercial Harbors 2020 Master Plan.
To be printed in Final Environmental Impact Statement.

Pictures By: Momi Subiono
3/12/2001

Shark nursery area



The area above shows an area where the sharks come in to give birth to their young. This beach will be poured over with cement if the State of Hawaii goes through with the Harbors Master Plan 2020 for Kawaihāe. This is the area where the Army Core of Engineers brings their big ships in. It is polluted due to accounts of sludge being emitted into the water from the Armys ships.

(Below) A view from another angle of Kawaihāe Beach. The quality of life will be affected by this project because the public will have no place to go to relax and spend time for families as this beach will be off limits to the public.



We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	Thomas Subiono	89-701 Lani Kona Rd. CC HI 96704	328-8939
2)	Kipuka Subiono	89-709 Lani Kona Rd. CC HI 96704	328-8939
3)	Paul [unclear]	84-709 Lani Kona Rd CC HI 96704	328-8939
4)	MARJORIE J. WILSON	P.O. Box 1595 KAWAII HI	885-7165
5)	Joseph [unclear]	P.O. Box 4062 Menlo Park CA 94026	(415) 712-1456
6)	HP [unclear]	1337 [unclear] Menlo Park CA 94025	(415) 248- [unclear]
7)	Nielani HARVEY	POB #4394 KAWAII HI 96705	885-7019
8)	Joyce HAWAII-KATA	POB #387 Kailua-Kona 96745	329-003
9)	Zac Vanderschiff	" " " "	" " " "
10)	EMIL MURTY	PO Box 1082 KAMUELA HI 96743	885-6174
11)	EDWARD MURTY	PO Box 1082 KAMUELA HI 96743	885-6174
12)	MARGAL JAMES	86-704 Lani Kona Rd. HI 96704	328-7142
13)	Patricia FUNDERS	2134 AIA Hill Ct #F 96706	621-2397

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	Dmytro [unclear]	P.O. Box 387697 Waikele HI	887-9497
2)	Paul [unclear]	P.O. Box 4002 Menlo Park CA	415/813-455
3)	[unclear]	68-3613 Pukunui Pl. Waikele HI	808-883-1918
4)	Rene K. Ross	68-3613 Pukunui Pl. Waikele HI	808-883-1919
5)	Kalio Bertelmann	P.O. Box 437195 Kaimula HI 96743	587-1075
6)	Patricia [unclear]		
7)	Bill [unclear]	P.O. Box 908 Kapaun HI 96755	889-5148
8)	Tim [unclear]	PO Box 4354 Kawaihae HI	885-4050
9)	Andrew K. [unclear]	P.O. Box 1022 Keolu HI 96758	
10)	Danahy Clarke	P.O. Box 826 Honauana HI 96726	939-8680
11)	[unclear]	P.O. Box 826 Honauana HI 96726	328-9106
12)	Alfred Wikum	PO Box 671 Honauana HI 96726	328-2224
13)	Kurt's Vamandi	Box 401 Honauana HI 96726	328-8099

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#	Name	Address	Phone #
1)	Carol DeFazio	P.O. Box 321 HONAUUNAU HI 96726	328-9071
2)	Carol Carroll	P.O. Box 929 HONAUUNAU HI 96726	328-2217
3)	Terry Wallace	P.O. Box 498 HONAUUNAU HI 96726	
4)	Mark Luis Collette	HONAUUNAU HI 96726	328-2200
5)	Jon Hapcia	P.O. Box 424 Kealahou, HI 96750	323-9529
6)	CAROL WALKER	P.O. 640 HONAUUNAU 96726	328-9937
7)	SUZANNE MAREK	P.O. 790 HONAUUNAU HI 96726	929 9150
8)			
9)			
10)			
11)			
12)			

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#	Name	Address	Phone #
1)	John Dorgan	P.O. Box 6075 HAWAII	938 0368
2)	Carol Lindenberg	P.O. Box 83 HONAUUNAU HI 96726	328 8753
3)	Mary Prevett	P.O. Box 492 HONAUUNAU, HI	328 7526
4)	Craig Iwanaga	79-1114 Mammalahua Hwy Honolulu, HI 96725	324-0101
5)	Cami Iwanaga	" " " "	"
6)	Dorothy Wiley	P.O. Box 1698 Kealahou, HI 96750	323-3138
7)	DIANA WOLKING	P.O. Box 906 HONAUUNAU HI 96726	371-3611
8)	Celeste Denis	P.O. Box 7150 Ocean View HI 96737	939-2877
9)	Edward Denis	P.O. Box 218 HONAUUNAU HI 96726	
10)	Mona Meder	P.O. Box 2114 Kealahou HI 96750	322-2008
11)	Andrea K. Ah Chin	P.O. Box 992 Kealahou HI 96750	328 7446
12)	Mark D. Garble	P.O. Box 269 Kealahou HI 96750	

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	San Kaco	Ocean View	
2)	Viluhmi Domingo	99-2154 5th St. Romi Kona HI 96757	739-8052
3)	Gay Carline	Box 722 Honouliuli	328-0709
4)	WILL Thomas	Ocean View HI	331-7160
5)	Virgina [unclear]	W. 21 KCC. HI. 96704	328-2641
6)	Janice Y. Kaka	87-3207 Rd. 2 Capt. Cook	328-8885
7)	Renee U. L. Hutchins	P.O. Box 6771 Ocean View HI	939-8668
8)	BYRON L. LEWORA Wright	94-5086 Puntich Rd	328-7637
9)	Clyde Brumaghim	87-3415 Datura Kd CC HI	328-2434
10)	Terry F. Canda	POB 66 Honouliuli HI	328-8359
11)	Stacy K. Domingo	Box 904 Kona HI. 96750	
12)	Mike Toole	88-1640 Ulua Drive	328-8868
13)	Leana Melusor	Box 166 Honouliuli	328-8915

Please send all petitions to the State of Hawai'i. Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	Julie A. Bushman-Smith	P.O. Box 5032 Hilo, HI 96720	808-929-8627
2)	[unclear]	"	"
3)	Jessie Parnes	PO Box 150 Honouliuli, HI 96706	
4)	Patty E. Jones	"	"
5)	CAROL FARKAS	PO Box 6176 Ocean View HI	939-8140
6)	RAFAEL RAMIREZ	Box 1446, Kalaheka HI 96750	328-2416
7)	Isaiah Dobner	P.O. Box 937 Kealahou HI 96750	328-8080
8)	Albert LaRosa	82-5791 Napooxoo Rd. Capt. Cook, HI	96704-328-1702
9)	Jim Wiley	PO Box 1698 Kealahou HI 96750	323-3438
10)	GRETCHEN KELLY	P.O. Box 146 CAPTAIN COOK, HI 96704	322-1778
11)	JANNY ROUNDS	835401 Painted Uluh Rd CAPT COOK HI 96704	328-8054
12)	KAILA HO	835401 PAINTED Uluh Rd CAPT COOK 96704	

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#	Name	Address	Phone #
1)	Linda M. Knapp	84-5119 Kala O'Keawe Rd. Captain Cook HI 96704	328-9292
2)	Asta L. Lohr	83-5465 Mamalahoe Hwy Capt. Cook HI 96704	328-2112
3)	Kelley L. Lohr	84-5062 City of Refuge Rd. ANNANUA HI 96726	328-9071
4)	Kii Morse	PO Box 370 Volcano HI 96785	967-7216
5)	Colette Hirata	44-254 Keahua Rd, Honokaa, HI	775-7167
6)	Randy Armitage	PO Box 588 Capt Cook HI 96704	328-7424
7)	Nancy Miller	POB 1087 Kailua Kona HI 96745	331-1943
8)	MARK Miller	POB 1087 K-k HI 96745	331-1943
9)	Loke Hochuli	POB 759 Hualala HI 96725	960-2364
10)	Asta Rogers	Box 1013 Capt Cook HI 96704	328-8127
11)	Wendy Peterson	POB 714 Hualala HI 96726	328-2566
12)	Wendy Peterson		1
13)	Raymond Mozena	100 Puka Beach Dr. HI 96743	882-7670

Please send all petitions to the State of Hawai'i. Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
	maru harada	marukh@aloha.net	
	maru harada	P.O. Box 1998 Kaimuki, HI 96743	885-7370
	Russell J Haas	PO Box 616 Mt. View HI 96771	963-6784
	BONNIE L Haas	PO Box 616 Mt. View HI 96771	" "

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#	Name	Address	Phone #
1)	Tom Bunge	734111 Olakua St Kailua-Kona, HI 96740	385-6519
2)	Phil Appington	77-6502 KILOHANA ST. KAILUA-KONA 96740	329-0716
3)	Tom Bunge	75-5771 MAIKULUA DR. KAILUA-KONA 96740	324-1552
4)	Gay Jones	78-6800 Alii Dr. (9-305) Kailua-Kona, HI 96740	324-6802
5)	Linda J.P. Russell	LINDA J.P. RUSSELL #5 Haku Nui Rd. Captain Cook, HI 96750	323-9791
6)	SUE MAILANDER	77-6311 ALI DR A201 KK 96740	329-8629
7)	KAREN SPACHNER	Box 5497 KK 96745	322-0015
8)	MARK KIMBALL	Box 561 HOLUALOA 96725	329-0980
9)	CHARLES GALLISON	Box 1143 CAPT. COOK 96704	328-8180
10)	BRIAN CRAIG	77-6541 PRINCESS KEELIKOLANI KK 96740	322-2056
11)	NICOLINA RINALDI	77-6489 PRINCESS KEELIKOLANI KK 96740	322-3385
12)	ELLEN CRACKER	P.O. Box 965 KEALAKEKUA 96750	328-8131

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	Ryan Nelson	745048 Kealahou St Kailua	334-9284
2)	Ram Savio	Box 2311 KEALAKEKUA HI. 96755	939-7201
3)	Marlene Lee	755249 Kopaka St Kailua	326-2502
4)	Lilani White	73-1141 HILIMANAMANA ST KK HI 96740	325-0800
5)	Richard Tetz	Box 867 Holualoa 96725	326-1870
6)	Karen Harty	PO Box 844 HONOLULU 96726	328-8566
7)	Peter Harty	PO Box 844 HONOLULU 96726	328-8566
8)	DEIDRE BROTT	73-1258 MELOMELA KK 96740	325-7304
9)	EVE DOOLAN	P.O. Box 1704 KEALAKEKUA 96750	MERMAIOEVE@HOTMAIL.COM
10)	TUDY RADMAN	73-1397 KARAU KK 96740	325-0668
11)	APRIL BURNS	Box 390435 KEAUHOU 96739	BACLAIR@HOTMAIL.COM
12)	JACKIE FINNERTY	77-360 PAULINA KK 96740	322-0017
13)	JACQUELYN WOODMANSEE	Box 1695 KK 96745	929-7092

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420 Wai'aleale Road
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Telephone 808 842 1133
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email: rmtowill@towill.com



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May 23, 2001

Ms. Momi Subiono
89-709 Lani Kona Road
Captain Cook, Hawaii 96704

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Subiono:

Thank you for your letter dated April 16, 2001, with regard to the above-referenced Draft Environmental Impact Statement (DEIS).

One copy of each petition received from you will be published in the Final EIS. In addition, petitions received from people other than yourself will be published in the FEIS.

Each of your letters received during the comment periods for the Environmental Impact Statement Preparation Notice and the Draft Environmental Impact Statement comment periods will be published in the FEIS, along with the associated responses.

Harbors Division cannot comment on the current General Plan revision program which is the responsibility of the County of Hawaii. With regard to your comments about the Office of Hawaiian Affairs, Harbors Division cannot respond on behalf of another organization.

The coral stockpile did not exist before the harbor was dredged. Expected demand for cargo handling will require greater development within the harbor, including the coral stockpile. The community has not "reclaimed" the area, rather the Harbors Division has allowed public access to the coral stockpile for recreational uses. Harbors Division expects to continue to allow public access to undeveloped areas of the harbor in the future.

We are not familiar with the "225,000 of Federal Funds" you mention with regard to "massive winter waves." If you provide more information Harbors Division would be willing to respond to your comment.

Ms. Momi Subiono
May 23, 2001
Page Two

With regard to fishponds, oral history accounts cited in the DEIS are in agreement that there were fishponds near the current location of Kawaihae Harbor. The accounts noted that the fishponds were destroyed by the 1946 tidal wave and were never restored. With regard to actions of the Army Corps of Engineers, the decision was made long ago to dredge Kawaihae Harbor and permanently alter the shoreline. We note that the green sea turtle *Chelonia mydas*, known in the Kawaihae Harbor area, is a threatened rather than endangered species. Concerning turtles laying their eggs, the former beach is gone and turtles cannot lay their eggs on the coral stockpile. We agree that loss of natural coastline area would have diminished the amount of sand where turtles could lay their eggs.

The shells you list in this and previous DEIS comment letters to the Department of Transportation, are not threatened or endangered. DEIS comments received from the U.S. Department of the Interior, U.S. Fish & Wildlife Service, indicated to the Harbors Division that the DEIS "adequately describes the proposed action and the primary fish and wildlife resources located at the proposed project site." Harbors Division does not plan further study of the shells.

If you have any questions please call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga
Project Manager

Cc: Department of Transportation, Harbors Division

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APR 20 2001



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3278
HONOLULU, HAWAII 96801

BRUCE S. ANDERSON, Ph.D., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
File #
01-0004/epo

Mr. Glenn Soma
April 20, 2001
Page 2

regulations cited in the DEIS. The Office of Solid Waste Management regulates facilities that process foreign wastes for disposal within the state. Therefore, all foreign waste removed from ships shall be directed to a State Department of Health permitted foreign waste facility. Other wastes (e.g. domestic municipal solid waste) generated aboard domestic ships shall also be disposed of at a State permitted solid waste facility.

2. Final disposition of incinerator ash generated by on-board incinerators shall be disposed of at a State Department of Health permitted municipal solid waste (MSW) ash monofills or other permitted disposal facilities approved by the Department of Health to accept solid waste ash.

Wastewater Branch

1. Wastewater collection for the Hilo Harbor area is handled by connection to the County of Hawaii sewer system. Therefore, we have no further concerns or comments as long as all wastewater is collected and handled by the County Sewer System.
2. Wastewater collection and disposal in the Kawaihae Harbor area is primarily handled by on site cesspools. The area is in a critical wastewater disposal area as determined by the Hawaii Wastewater Advisory Committee. No new cesspools will be allowed in this area. Continued use of existing cesspools is covered under the provisions of Hawaii Administrative Rule, Chapter 11-62. We recommend that a sewer master plan and centralized collection, treatment and disposal system be implemented.
3. All wastewater plans must conform to applicable provisions of the Department of Health Administrative Rules, Chapter 11-62, Wastewater Systems. We do reserve the right to review the detailed Wastewater plans for conformance to applicable rules. Please contact the Planning & Design Section of the Wastewater Branch at (808) 586-4294 if you have any questions.

Sincerely,

GARY GILL

Deputy Director
Environmental Health Administration

Mr. Glenn Soma
Harbors Division
Department of Transportation
79 South Nimitz Highway
Honolulu, Hawaii 96813

Dear Mr. Soma:

Subject: Draft Environmental Impact Statement - Hawaii Commercial Harbors 2020 Master Plan

Thank you for allowing us to review and comment on the subject document. We have the following comments to offer:

Clean Air Branch

In addition to the required elements, the branch is recommending that the Draft Environmental Impact Statement include an assessment or discussion on the following:

1. Air emissions from any equipment installed to support terminal facilities and the associated air pollution and permitting requirements; and
2. The emission increases and potential air quality impacts resulting from the increased size and volume of ships at dock. Potential air quality impacts may include, but are not limited to, impacts to visibility from stack emissions and ambient air quality impacts from ship equipment (diesel engine generators, boilers, incinerators) emissions generated while at dock.

Solid Waste Management Branch

Our comments focus on section 3.11 of the DEIS "Solid Waste and Hazardous Materials".

1. Foreign solid waste generated by carriers, which left foreign ports and their first port of entry to the United States is in Hawaii, must comply with the U.S. Department of Agriculture

420 Wai'alea Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
eMail info@towill.com



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Mr. Gary Gill
May 16, 2001
Page Two

The FEIS will contain the following discussion relative to potential air quality impacts resulting from the size and volume of ships at dock:

The State of Hawaii, Department of Health (DOH), Clean Air Branch, noted during consultation that DOH has become aware that air quality monitoring is being performed near cruise ships at berth in major cruise destinations such as Alaska. DOH is currently considering implementation of a comparable monitoring program to encompass both air quality standards and the presence of "opacity" or readings of smoke from a ship's smokestack. Any citations for air pollution emissions or opacity will be levied by DOH on cruise ship owners. Harbors Division will cooperate with DOH by providing access to harbor facilities to perform air quality monitoring if such a program is implemented in the future.

Solid Waste Management Branch

Section 3.11.3 "Solid Waste Proposed Mitigation Measures" will include the following additional language:

Foreign solid waste generated by carriers, which left foreign ports and their first port of entry to the United States is Hawaii, must comply with the U.S. Department of Agriculture regulations cited in the DEIS. The Office of Solid Waste Management regulates facilities that process foreign wastes for disposal within the state. Therefore, all foreign waste removed from ships shall be directed to a State Department of Health permitted foreign waste facility. Other wastes (e.g. domestic municipal solid waste) generated aboard domestic cruise ships shall also be disposed of at a State permitted solid waste facility.

Any final disposition of incinerator ash generated by on-board incinerators of cruise ships shall be disposed of at a State Department of Health (DOH)-permitted municipal solid waste (MSW) ash monofills or other permitted disposal facilities approved by DOH to accept solid waste ash. Any cruise ship firm wishing to dispose of solid ash waste would have to meet Federal Resource Conservation and Recovery Act, Subtitle D requirements as imposed by individual DOH-approved landfills or disposal facilities.

May 16, 2001

Mr. Gary Gill
Deputy Director, Environmental Health Administration
State of Hawaii, Department of Health
Post Office Box 3378
Honolulu, Hawaii 96801

Hawaii Commercial Harbors 2020 Master Plan Draft Environmental Impact Statement

Dear Mr. Gill:

Thank you for your letter of April 20, 2001 which was received by the Department of Transportation, Harbors Division in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

We have responded using the same headings contained in your comment letter.

Clean Air Branch

In response to your comments regarding air quality, the FEIS will contain the following discussion relative to air emissions from terminal equipment and the associated air pollution and permitting requirements. The revisions will be added to Section 3.14, Air Quality:

The State of Hawaii, Department of Health (DOH), Clean Air Branch, regulates emissions from certain types of equipment, such as generators and boilers, under Hawaii Administrative Rules, 11-60.1, Pollution Control. Currently no such equipment is anticipated at the proposed harbor facilities. However, if such equipment is utilized on harbor property in the future, equipment owners and/or operators will have to conform to air quality regulations cited above.

Mr. Gary Gill
May 16, 2001
Page Three

Wastewater Branch

With regard to item #1 relating to wastewater collection at Hilo Harbor, we note you have no further concerns or comments.

With regard to item #2 concerning wastewater collection at Kawaihae Harbor, the FEIS will contain the following addition to Section 3.12.3 Proposed Mitigation Measures (for wastewater collection):

The Kawaihae Harbor vicinity is in a critical wastewater disposal area as determined by the Hawaii Wastewater Advisory Committee. No new cesspools will be allowed in this area. Continued use of existing cesspools is covered under provisions of Hawaii Administrative Rules, Chapter 11-62, Wastewater Systems. Harbors Division will develop a sewer master plan for Kawaihae Harbor and analyze the feasibility of a centralized collection, treatment and disposal system that conforms to applicable provisions of Hawaii Administrative Rules, Chapter 11-62, Wastewater Systems.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

DOCUMENT CAPTURED AS RECEIVED

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

Name	Address	Phone #
Dina Case	P.O. Box 411 Kamuela, Hawaii	887-1396
Pua Case	P.O. Box 6918 Kamuela, HI	885-5383
LEILA BERTELMANN	PO BOX 437001 KAMUELA, HI	885-4287
Kehau Bertelmann	P.O. Box 472 Kamuela, Hawaii 96743	885-2140
Louie Sanchez	Box 437442 Kamuela, HI 96743	885-4958
Alita Bertelmann	Box 437155 " " "	887-1075
TONI LAD RADOR	PO BOX 1512 HONOKAA HI 96727	775-1322
ERIK MONTANA	P.O. Box 1592 HONOKAA HI 96727	775-1322
DIAMOND P.K. BRANCO	PO Box 908 HONOKAA HI 96727	775-180671
Ann Kennedy	PO Box 831 Kamuela HI 96743	887-1323
Alita Phillips	P.O. Box 342 Kamuela HI 96743	885-1642
KAKA STAIN	40 Dena Ave. Hilo, HI 96720	961-0122
Kelkono Ferreira	P.O. Box 2336 Kamuela, HI 96743	885-4960

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION

Apr 23 1 07 PM '01

MARK D. AYERS
DNITRA AYERS
AYERS AUTOMOTIVE

74-5491 Kalwi Street
Kailua Kona, Hawaii 96740
(808) 327-1311
(808) 327-9779
AyersAuto49@aol.com

April 20, 2001

To: Department of Transportation

From: Dnitra Ayers

To whom it may concern:

Attached please find several pages of petitions that I have had signed by local residents of the Big Island who are in opposition of the planned development of the Kawaihae Small Boat Harbor Master Plan 2020.

I personally am against the proposed storage of liquid bulk petroleum at the site mentioned. We are regular users of the beach there and find that it is one of the cleanest, safest, most precious beach on this side of the island. The shells that we find there can be very rare, and with some of the facts that I have learned recently, I hear are exclusive to that area. Kawaihae landing is a wonderful place to take our children. The water is clean, there are no waves and the access is easy. We enjoy the solitude that beach provides and would be saddened to lose it. We make every effort possible on weekends to clean up the rubbish that floats ashore and is left by others as there are no garbage cans provided. We take pride in "our beach".

Please review these petitions and know that they were signed by people who feel the same way as I do. I am not against progress, but I fear what would happen if there were to be a spill or even worse a tidal wave. Please consider these possibilities before you take away our beach.

Thank you very much.

Dnitra Ayers
Dnitra Ayers

Please sign if you're interested...
Thank you.

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

Name	Address	Phone #
DANIEL RICK	P.O. Box 521 Kailua-Kona HI 96745	323-3108
Cheryl Kahikina	78-4329 Holohele St HI 96740	325-5912
Melinda Verden	75-5874 Waiola Rd, KK HI 96740	327-7744
DARREN ELISTON	77-6501 Seaweed Cr. KK HI 96740	386-0125
Mami TAVARES	PO Box 7 Hualaia HI 96725	326-2582

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Name	Address	Phone #
1) KIRK LAMMANCE	P.O. Box 881 Kailua HI 96742	927-8228
2) MARLENE LEEVEY	P.O. Box 280 Kailua HI 96743	885-5400
3) FRANK FRENEY	" " " " " "	" " "
4) DEAN KATHIKINA	68-3610 Elede St Wailua HI	96735
5) JULIA KATHIKINA	68-3610 Elede St Wailua HI	96735
6) BENJAMIN OMEROD	PO Box 5653 Kailua HI	96747
7) MAILE DANA	PO Box 2346 Kailua HI 96743	885-8752
8)		
9)		
10)		
11)		
12)		

Please send all petitions to the State of Hawai'i, Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939. Mahalo for signing and helping to protect our Coastline!

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We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

#	Name	Address	Phone #
1)	Jolyon Dean	P.O. Box 451 Kamuela 96743	885-4783
2)	Kevin Kabe	75-402 Hama St. K-K HI 96740	329-1970
3)	Michael McMillen	P.O. Box 2451 Kealahou 96750	324-0629
4)	Erin To Minamishina	73-405 Hama St. K-K HI 96740	960-9725
5)	Lance Owens	87-3211 Datura St Capt Cook	328-0234
6)	David	P.O. Box 390773 Kailua HI 96739	960-3626
7)	Bob Wilson	P.O. Box 437398 Kamuela 96743	887-0948
8)	L	P.O. Box 1071 Kealahou 96750	951-0909
9)	Kalani Kalina	P.O. Box 3634 Kailua Kona 96746	325-2505
10)	Patricia	75-5135 Palani HI Kailua Kona 96746	334-0014
11)	William P. Hall	P.O. Box 44402 YAMUELA HI 96743	882-7707
12)	Donna A. Hall	P.O. Box 44402 Kawaihae HI 96743	882-7707

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#	Name	Address	Phone #
1)	Lynn Frepp	P.O. Box 3276 Kailua Kona HI 96745	327-1505
2)	Cheryl	77-6108 Piliwai ST Kailua HI 96745	322-5225
3)	Barry Takunishi	73-431 Lania St Kona, HI 96740	331-2509
4)	Margie Judd	73-1499 Apela Pl. Kailua-Kona	325-5190
5)	LuKe Achay	P.O. Box 531 K-K HI	329-1323
6)	Jan + John	P.O. Box 1181 Kailua-Kona, HI 96745	325-7325
7)	David P. Yonemura	73-1226 Lolaa Dr. Kailua-Kona, HI 96740	325-5370
8)	Julie Richwine	P.O. Box 604 K-K HI 96745	331-2700
9)	Eric Elder	161 Puako Beach Dr Kamuela HI 96743	882-7651
10)	John	P.O. Box 427 96745	325-3238
11)	John	P.O. Box 561 96704	329-6152
12)	Gary McCollum	73-1083 Lolaa Dr 96740	

Please send all petitions to the State of Hawai'i. Department of Transportation 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

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Please send all petitions to the State of Hawai'i, Department of Transportation, 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Mami Saito 328-8739. Mahalo for signing and helping to protect our Coastline!

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#	Name	Address	Phone #
1)	Michael P. Kennedy	P.O. Box 831 Kamehale	887-1323
2)	William Sheldon	58-280 Pyramon Rd	888-7271
3)	Patricia K. Rose	P.O. Box 219, Kapaa, HI	96755 889-0182
4)	Jared Eaton	Box 219 Kapaa HI	96755 889-0182
5)	Joseph G. Souza	Rm 1874 Hanaia HI	96727 776-1190
6)	Tracey Pava	PO Box 814 Hanalei HI	96727 776-1190
7)	James Dine	Box 1295 Kamehameha	808-7732
8)	Edward M. Michel	P.O. Box 891 NAAHEU, HI	96772 929-8228
9)	August W. Summerfield	POB 5285 Kailua-Kona	96745 808-331-8733
10)	Yvonne M. Summerfield	" "	" "
11)	Taylor W. Summerfield	" "	" "
12)	Brennan Ayers	68-3776 Laulea Place Waikoloa	96738 883-2227

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Name Address Phone #
COLLEEN C. WRIGHT P.O. BOX 1235 KEMAHAKUA, HI 329-3791

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Name Address Phone #
1) *Ramona Zink* 77-1998 Kalamia Pl 365-1629
2) *Tara Smyth* 14-991 Monowalea St A205 534-0912
3) *...*
4) *Peter McGill* 73-317 B KALALINA X2 96741 329-3972
5) *Pidge Close* Box 4887 Kailua Kona 96745 528-9385
6) *Kathleen Kang* PO BOX 2189 K-K, HI 96745 326-4086
7) *Kip Larson* 73-4152 Kailua Pt Kailua 96745 322-0216
8) *Jarosa Nelson* 73-4225 Eluna St K-K 96740
9) *Tina Koiso* 73-4300 Ikena Pl 326-0398
10) *Carla Santos* 70 Awa 1252 Kailua Kona 96745 326-1712
11) *Brian Caruana* P.O. Box 94-5149 Puuloa Pt. HI
12) *Sabrina Williams* P.O. Box 5172 Kailua Kona HI 96740

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Name: Peter Hee Address: 75 317 E KAHALUA K-K 90224 328-9972
Tiara Hee 73-4250 A Kaunila St. K.K. 91240 325-6259

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Name: Raige Clever Address: PO Box 46557 K-K, HI 96745 335-9245

Kawaihae Harbor expansion plans finds oppositio:

By BOBBY COMMAND
West Hawaii Today

A South Kona woman said she has quit her job as a Hawaiian studies teacher to devote her efforts to stopping a planned expansion at Kawaihae Harbor.

Momi Subiono, 33, said she is spearheading a petition drive demanding bulk petroleum storage areas not be built as proposed in the

Hawaii Commercial Harbors 2020 Master Plan.

The state Department of Transportation plans to spend \$150 to \$300 million for upgrades to Kawaihae and Hilo Harbors, which would take care of the Big Island's deep-draft harbor needs for the next 20 years.

State and petroleum company officials say a fuel farm at Kawaihae would make the distribution of fuel in West Hawaii more efficient as it would eliminate the need to truck it from Hilo, where it now is unloaded from fuel barges.

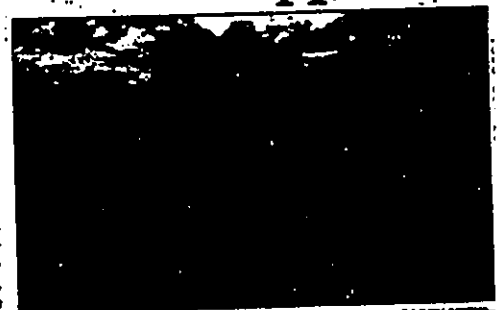
But the former Honaunui School teacher said that's not worth the risk of a potential spill or other dis-

aster at Kawaihae. "This is a tidal wave zone," she said. "There would be massive environmental damage if a tidal wave hit."

Subiono said she is also defending the rights of those who use the man-made coral beach at the south end of the harbor.

"This is our beach," Subiono said. "We're going to fight for it."

The proposed expansion of the deep-draft harbor that serves West Hawaii would include a bulk petroleum cargo terminal, dry bulk terminal, cargo container terminal, passenger terminal and ocean research facility, military cargo ter-



—SARON BROWN—
The coral/sand beach area at the south end of Kawaihae Harbor is the site of a proposed pier.

See NO NEW:
Page 4A

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihae Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kawaihae's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

estiny
Pg 4/25/01

Name	Address	Phone #
1) [Name]	73-1417 [Address]	[Phone]
2) Krista Kalsley	78-6934 B Waiola Rd K.K. 96740	322-2805
3) Kelly Stevens	75-52	
4) [Name]	73-1213 Ahikuni Dr K.K. HI 96740	327-477
5) [Name]	73-1219 [Address]	315-6897
6) [Name]	75-317 P. KAKALINA K.K.	329-3972
7) [Name]	PO Box 320748 Keauhou, HI 96739	331-3036
8) [Name]	73-4342 [Address]	325-7878
9) [Name]	71-463 [Address]	351-3322
10) [Name]	731208 [Address]	325-7729
11) [Name]	75-317 P. KAKALINA Kailua Kona HI	96740 329-3972
12) [Name]	76-6717 Waiola Rd Kailua Kona HI	96740 322-7714

Please send all petitions to the State of Hawai'i, Department of Transportation, 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subison 328-8939 Mahalo for signing and helping to protect our Coastline!

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Name	Address	Phone #
Jane Phe	910 The Club - Kailua-Kona	326-2582
Johanna Shute	73-1083 Ahikuni Dr. K.K. HI 96740	325-5318
Colleen Sullivan	PO Box 4085 K.K. HI 96745	
Kerri Lewis	75-338 Aloha Kona Dr. K.K. HI	
Herdi McKishor	PO Box 8044 Kailua-Kona	
Jay Wicki	73-1400 Hamua K-Kona	5-0321
[Name]	75-5617 Kailua Road Kailua-Kona HI	96740 321-2582

Please send all petitions to the State of Hawai'i, Department of Transportation, 869 Punchbowl St. Honolulu, Hawai'i 96813-5097 or call Momi Subison 328-8939 Mahalo for signing and helping to protect our Coastline!

**DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION**

APR 19 11 27 AM '01

<DNY>

We, the people of Hawai'i County, do hereby "oppose" the development of Kawaihewa Small Boat Harbor in the State of Hawai'i's Master Plan 2020. We do not agree that Liquid bulk petroleum oil, should be stored in Kawaihewa's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and pathfinding area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawai'i's Master Plan 2020 be killed.

Name Address Phone #

Terenette H.K. Kaladiki P.O. Box 1628 Kamuela HI 96740
9681189

Jill Wynn S.F. Watson P.O. Box 2441 Kamuela HI 96743
96871519

Helen Kurlansky P.O. Box 1167 " "
9697-2169

Marylou Tawana 67-1247 Mamasakoa Hwy. Kamuela, HI 96743
9656209

Kathleen Drew Bane P.O. Box 453 Kamuela HI 96743
9655347

Beverly St John P.O. Box 262 Kaneohe HI 96743
9659191

Helen Lewis P.O. Box 453 Kamuela HI 96743

Lillian Yamaguchi P.O. Box 1393 Kamuela HI 96743
9650474

Rene Spencer Box 101 Kapahuae HI 96764

Answer:

Please send all petitions to:

420 Wai'aleale Road
Suite 411
Hanalei, Hawaii 96721-4941
Telephone 808 842 1133
Fax 808 842 1927
eMail rml@rmtowill.com



R. M. TOWILL CORPORATION
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May 23, 2001

Ms. Dnira Ayers
74-5491 Kaiwi Street
Kailua Kona, Hawaii 96740

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Ayers:

Thank you for your letter of April 20, 2001, in which you provided comments to the Department of Transportation on the above-referenced Draft Environmental Impact Statement (DEIS).

We acknowledge receipt of the petitions attached to your letter and will publish them in the Final Environmental Impact Statement.

As you state in your letter, the Department of Transportation, Harbors Division plans to develop a liquid bulk terminal in the coral stockpile area of Kawaihae Harbor. You may not be aware that all of the petroleum currently used by West Hawaii, including jet fuel for Kona International Airport, is trucked across the island from Hilo Harbor. The liquid bulk terminal would allow petroleum products to be offloaded from vessels and stored at Kawaihae Harbor, thus precluding dangerous transit of fuel across the island.

The liquid bulk terminal will occupy only a portion of the coral stockpile area. The U.S. Army-controlled LST/LSV underwater ramp area will still be available for outdoor recreation by the community. Harbors Division is required to maintain access to the harbor area by the U.S. Army Corps of Engineers. The area you refer to as "our beach" is a commercial harbor. Harbors Division allows recreational activities within its harbors as long as personal safety and critical harbor operations are not compromised.

With regard to your comments about shells, the shells now found at the coral stockpile are not under Federal protection as threatened or endangered species. The DEIS states on page 3-30, "According to wildlife biologists at the U.S. Fish & Wildlife Service, these mollusks are common and were most likely dredged from former coral reefs as opposed to something that grows there now."

Dnira Ayers
May 15, 2001
Page Two

Regarding the liquid bulk terminal, any such facility will be constructed under strict environmental and construction standards for spill containment as disclosed in the Draft Environmental Impact Statement in Section 3.15, Water Quality. In addition, Kawaihae Harbor is equipped with spill containment apparatus today.

With regard to tsunami, as a shoreline area, the harbor will always be susceptible to the forces of nature, which is acknowledged in the Draft Environmental Impact Statement in Section 3.6, Natural Hazards.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

DIRECTOR'S OFFICE
DEPT. OF
TRANSPORTATION
APR 23. 2 19 PM '01

Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813-5097

April 20, 2001

To Whom It May Concern:

My name is Robina Subiono, I am writing in opposition to of the Kaula Small Boat Harbor in the State of Hawaii Master Plan 2020. Personally it has been a place that our family has gathered at for years. My Mother's funeral was held on that very shore. Her Ashes are in the harbor as it was her request to be scattered there as it would be where her family would continue to gather. Our small children can swim in the safe shallow waters and the older ones can venture out a ways, others can sit on the shore and gather the indigenous shells that are hidden beneath the rocks and fishing the shore. I have no big words or ideas to speak to you to beseech you to hear the cry of one local resident. But it is a place where we frequently go, as many do. I know its Hawaiian seeded land, and I am Hawaiian thus heir to some land rights. I know that the Bible tells us not to remove the ancient landmarks of our Fathers...perhaps God knew sometimes our skills and modern day technologies would dim our hearts to the land of our birth, and its value to the people. Money and increasing of moles sometimes desecralizes our hearts, but a prayerful pause could easily bring the revelation of alternative means of revenue and yet keep the heart of the land as once purposed for the people.

Please consider my letter and the value of these lands that it hold for me and my family. I am one voice but many can be heard through me if you would take the moment to ponder it. I trust the our Great Akua will show you. Mahalo for your time.

O Waa Ibo No,

Robina Subiono

Robina Nela Subiono
Big Island Resident

Enclosure / petition with signatures (a copy has been retained.)

We, the people of Hawaii County, do hereby "oppose" the development of Kaula Small Boat Harbor in the State of Hawaii's Master Plan 2020. We do not agree that Liquid bulk petroleum or oil, should be stored in Kaula's fragile ecosystem and we demand that the Community be allowed to continue to use the beach, in it's entirety for Recreational and gathering area forever. We also feel the Cultural Significance for the whole area and demand that the State of Hawaii's Master Plan 2020 be killed.

Name Address Phone #70.0.309 1742

- | | | |
|----|-----------------------------|-----|
| 1 | DAVE DOWLING - 808-464-1743 | 23 |
| 2 | Paul TRUMPAW - 808-464-1743 | 24 |
| 3 | Becky King - 808-464-1743 | 25 |
| 4 | John - 808-464-1743 | 26 |
| 5 | John - 808-464-1743 | 27 |
| 6 | John - 808-464-1743 | 28 |
| 7 | John - 808-464-1743 | 29 |
| 8 | John - 808-464-1743 | 30 |
| 9 | John - 808-464-1743 | 31 |
| 10 | John - 808-464-1743 | 32 |
| 11 | John - 808-464-1743 | 33 |
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| 43 | John - 808-464-1743 | 65 |
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Please send all petitions to the State of Hawaii's Department of Transportation 869 Punchbowl St. Honolulu, Hawaii 96813-5097

or call Mom Subiono 328-8939 Mahalo for signing and helping to protect our Coastline!

420 Wai'aleale Road
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Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1937
email rmtowill@hawaii.com



R. M. TOWILL CORPORATION
SINCE 1970

Planning
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Environmental Services
Photogrammetry
Surveying
Construction Management

May 16, 2001

Ms. Robina Nalani Subiono
64-273 Puu Pulehu Loop
Kamuela, Hawaii 96743

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms Subiono:

Thank you for your letter dated April 20, 2001 which was addressed to the Department of Transportation in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS). We obtained your address through your published listing with telephone Directory Assistance since you provided no return address in your letter.

The "Kawaihae Small Boat Harbor" is a facility under the jurisdiction of the State of Hawaii, Department of Land and Natural Resources (DLNR). Unfortunately, Harbors Division cannot respond for another agency. To speak to a responsible person concerning the Small Boat Harbor at Kawaihae, please contact Mr. Darryl Quiocho, Acting District Manager, DLNR Boating District Office, at (808) 329-4215. His mailing address is 74-380 Kealahou Parkway, Kailua-Kona, Hawaii 96740.

We appreciate your taking time to send your comments. We will publish your letter and the attached petition in the Final Environmental Impact Statement. If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager



BENJAMIN J. CAYETANO
Deputy Director



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

225 SOUTH BENTLEY STREET
HONOLULU, HAWAII 96813
TELEPHONE (808) 531-4194
FACSIMILE (808) 531-4195

GENEVIEVE SALMONSON
DIRECTOR

April 23, 2001

Brian Minnai
Department of Transportation
Harbors Division
79 S. Nimitz Highway
Honolulu, HI 96817

Attn: Glenn Soma

Dear Mr. Minnai:

Subject: Draft Environmental Impact Statement (EIS), Hawaii Commercial Harbors 2020
Master Plan

We have the following comments to offer:

Summary section: The following are required in a concise discussion in the summary section:

- Significant beneficial and adverse impacts
- Proposed mitigation measures
- Alternatives considered
- Unresolved issues
- Compatibility with land use plans and policies
- Listing of permits or approvals

Project costs: Disclosure of expenditure of state funds, including federal funds flowing through the state, is required by law. If exact amounts are not known, you may give a possible range of expenditures. Your response to our comment on the EIS preparation notice on this indicated that it would be included in the draft EIS, but it is not. Be sure to include it in the final EIS.

Impacts:

- a. Your response to Momi Subiono's letter indicated that a discussion of real estate trends would be included in the draft EIS, but is not. The EIS law requires a discussion that covers the direct and indirect (secondary) effects and the population and growth impacts of the project.
- b. Include a discussion of probable adverse impacts that cannot be avoided.

Related projects: The EIS law requires a discussion of geographically related projects for each region. This includes both public and private, and existing or planned projects. Also required is an analysis of

Brian Minnai
April 23, 2001
Page 2

cumulative impacts of the each harbor project and others in the same region. The analysis should include the factors of population growth or shifts, traffic, noise, air quality, water resources, and drainage.

Permits: In the table in chapter 6 indicate the status of the various permits. If a permit application has not yet been filed, list the anticipated date of filing.

Relationship to land use plans and policies: The following sections need a fuller discussion, including any conflicts which exist, and the rationale for proceeding in spite of conflicts:

- a. Marine Sanctuaries Act (section 5.2.9)
- b. Coastal zone management (section 5.3.4)
- c. Hawaii County general plan (sec. 5.4.1)

Unresolved issues: Include a section that discusses these issues, when and how they will be resolved or the reasons why the action will proceed if they are not resolved. A synopsis of this discussion must appear in the summary section of the final EIS.

Acronyms and technical terms: In the final EIS include the acronym SWCD (found in chapter 7) in the acronyms list. Also include a definition of "baitland" (found in chapter 3).

Figures and tables: Please make the following corrections:

- Figure 11 (Wind Patterns) legend needs correction
- Table 5 (LOS) needs to indicate units in the Density columns
- Table 9 (Marine Biology survey): indicate the number of individuals of green sea turtles
- Figure 27 (Ceded Land, Hilo) needs a clear inset
- Figure 28 (Ceded Land, Kawaihae) should indicate square footage as in Fig. 27

Preparers: Include a list of all persons or firms preparing the EIS.

Title page signature: The director or director-in-charge of the applicant agency is required to sign the environmental impact statement and indicate that it and all ancillary documents were prepared under the signatory's direction. This is required by § 11-200-20d of Hawaii Administrative Rules. Be sure this is included in the final EIS. Submit the FEIS copy with the original signature to this office.

If you have any questions call Nancy Heinrich at 586-4185.

Sincerely,

Genevieve Salmonson

GENEVIEVE SALMONSON
Director

c: Gail Atwater

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200

1125-586 (808)

111:01 10 22 Jdu

420 Wai'aleale Road
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Ms. Genevieve Salmonson
May 25, 2001
Page Two

May 29, 2001

Ms. Genevieve Salmonson
State of Hawaii
Office of Environmental Quality Control
236 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Salmonson:

Thank you for your letter of April 23, 2001 addressed to the Department of Transportation, Harbors Division, in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

We have responded to your comments using the same headings provided in your letter.

Summary Section

The Final Environmental Impact Statement (FEIS) will contain the required information in Chapter 1, "Project Summary."

- Significant beneficial and adverse impacts
- Proposed mitigation measures
- Alternatives considered
- Unresolved issues
- Compatibility with land use plans and policies
- Listing of permits or approvals, including approximate time frames for permit applications.

Project Costs

The FEIS will include an additional statement in Section 2.6, Schedule and Cost, indicating that "State of Hawaii funds and land will be utilized for the proposed harbor development. No federal funds will be used."

Impacts

In further consultation with your staff regarding discussion of real estate impacts, the FEIS will be revised in Section 2.3.2, "Demand Factors for Harbor Facilities: Cargo and Cruise Ship Arrivals." The FEIS will explain why building permits are an indicator of real estate trends and provide information about the residential and commercial rental market on the Island of Hawaii based on interviews with realtors. Finally, the FEIS will summarize the discussion of real estate trends.

Concerning adverse impacts that cannot be avoided, any such impacts will be disclosed in Chapters 3 and 4 in the discussion of potential impacts and proposed mitigation measures.

Related Projects

In Chapter 5, "Relationship to Plans, Policies and Controls," the FEIS will discuss geographically related projects and plans based on additional agency consultation with the County of Hawaii Planning Department, the State Office of Planning, the Department of Hawaiian Home Lands and the State Land Use Commission. The FEIS will also discuss the cumulative impact of related projects and plans.

Permits

Chapter 1, Project Summary, and Chapter 6, "Necessary Permits and Approvals," will provide information about the order in which permits may be applied for by the Department of Transportation, Harbors Division. In Chapter 1, Project Summary, the FEIS will contain the following information:

Listing of Necessary Permits and Approvals

Applicable permits and approvals that may be required for the proposed action include the following, in order of application:

1. Coastal Zone Management Federal Consistency Certification, issued by the Office of Planning, State Department of Business Economic Development and Tourism
2. Section 401 Water Quality Certification, issued by the State Department of Health
3. Department of the Army Permit, issued by the U.S. Army Corps of Engineers
4. Conservation District Use Permit, issued by the State Department of Land and Natural Resources
5. Shore and Shorewaters Permit, issued by the State Department of Land and Natural Resources
6. Shoreline Certification, determined by State Department of Accounting and General Services and State Department of Land and Natural Resources

7. *Historic Preservation and Federal Section 106 Review, by State Department of Land and Natural Resources*
8. *Federal Section 106 Review, Protection of Historic Properties, by the State Department of Land and Natural Resources*
9. *National Pollutant Discharge Elimination System Permit, issued by State Department of Health*
10. *Permit to Construct a Wastewater System, issued by State Department of Health*
11. *Hazardous Waste Permit, issued by State Department of Health*
12. *Non-Covered Source Air Permit, issued by State Department of Health*
13. *Asbestos Regulations, State Department of Health*
14. *State Highways Permit, issued by State Department of Transportation*
15. *Section 103 Marine Protection, Research and Sanctuaries Act, issued by the U.S. Army Corps of Engineers*
16. *Public Lands Dispositions, by State Department of Land and Natural Resources*
17. *Special Management Area Permit, issued by the County of Hawaii, Planning Department**
18. *Shoreline Setback Variance, issued by the County of Hawaii, Planning Department**
19. *Flood Hazard Controls, issued by the County of Hawaii, Department of Public Works**
20. *Grading, Grubbing, Excavating and Stockpiling Permits, issued by the County of Hawaii, Department of Public Works**
21. *Building Permit, issued by the County of Hawaii, Department of Public Works**

* County of Hawaii permits are not required for actions taken by Harbors Division, pursuant to Section 266-2(b), Hawaii Revised Statutes. However, actions taken by tenants on Harbors Division property would be subject to County of Hawaii permitting.

Relationship to Plans and Policies

The FEIS will contain amplified discussion in Section 5.2 concerning the Marine Sanctuaries Act and Coastal Zone Management Act and in Section 5.4 concerning the Hawaii County General Plan, as well as discussion of how these plans and policies relate to the project and whether there are any conflicts.

Unresolved Issues

The FEIS will include a new section entitled "Unresolved Issues."

Acronyms and Technical Terms

With regard to the acronym "SWCD" found on page 7-8 of the DEIS, the final EIS will spell this out as follows on the same page: "Mauna Kea Soil and Water Conservation District".

The definition of balanid will be included in the FEIS Chapter 11, Glossary, as follows:
Balanid: A term referring to a family of acorn barnacles, i.e. Family Balanidae.

FIGURES AND TABLES

DEIS Figure 11 (Wind Patterns) -- the revised figure will be included in the FEIS.

Table 5 -- "LOS" -- discussion prior to Table 5 will read as follows in the FEIS:
"Density is the number of vehicles per lane-mile on a segment of roadway. Density is dependent on the number of lanes, volume (rate of flow in vehicles per hour), and speed of the traffic stream (in miles per hour)."

Table 9 (Marine Biology survey): the FEIS will include the number of individual green sea turtles observed in Table 9 and also in Table 10. In each of these tables the FEIS text will note "one individual observed."

DEIS Figure 27 (Ceded Land, Hilo) -- the revised figure with a more clearly presented inset will be included in the FEIS.

DEIS Figure 28 (Ceded Land, Kawaihae) -- the revised figure will be included in the FEIS and contain the following addition to the legend: "Area of ceded lands -- approximately 72 acres, including the breakwater area."

PREPARED

The FEIS will include the following list of persons and firms who prepared the FEIS as a new chapter number 14 entitled "List of Preparers."

<u>Preparer</u>	<u>Project Role</u>
<i>R.M. Towill Corporation</i>	<i>Project Manager for EIS Preparation</i>
<i>Chatter T. Koga, AICP</i>	<i>EIS Preparer; Oral History</i>
<i>Gail W. Ahwater, AICP</i>	<i>Environmental Site Assessments</i>
<i>David Gerow</i>	
<i>Julian Ng, Incorporated</i>	<i>Traffic Impact Analysis</i>
<i>Julian Ng, P.E.</i>	

Ms. Genevieve Salmonson
May 25, 2001
Page Five

<u>Preparer</u>	<u>Project Role (continued)</u>
Char & Associates, Inc. Winona P. Char	Botanical Surveys
AECOS, Inc. S. A. Catlett S. Coles E. Gulnher	Marine Biology and Water Quality Analyses
Haun & Associates Alan Haun, Ph.D	Archaeological Inventory Survey, Hilo Harbor

Title Page

The Director of Transportation will sign a new title page with the following verbiage accompanying the signature line: "This statement and all ancillary documents were prepared under my direction and, to the best of my knowledge, address the content requirements as set forth in HAR 11-200-17 and 11-200-18, as appropriate." The FEIS copy with the original signature of the Director, State of Hawaii, Department of Transportation, will be forwarded to OEQC.

If you have any questions please call me or Gail Atwater at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

DATE: April 23, 2001

TO: Mr. Glen Soma - DOT Engineer (808) 587-2504 - Facsimile

FR: Josephine Keilipio - West Hawaii Resident
P.O. Box 368
Kealahou, HI 96750

RE: Draft Environmental Impact Statement for
Hawaii Commercial Harbor's Master Plan 2020

Dear Mr. Soma,

I am appalled that your master plan continues to work against helping our island to achieve sustainable and self-sufficient goals by making us more and more dependent on out of State imports. Perhaps if we were less dependent on outside goods, DOT would not have to expand the Kawaihae harbor to such extreme proportions. Shame on DOT!

The coral beach just inside of the Army's LST area has been a longtime, safe, swimming spot for our local families. Just yesterday, I observed families with youngsters picnicking along this area. My own dogs were even able to wade in and swim for the first time in their lives. Your plan to turn this beach into an inter-island pier means that you will be robbing our local families from a valuable quality-of-life resource. This area should be turned into a park instead. I think the State should be looking out for its local folks first before accommodating more and more tourists and bulk items. The nearby public parks are already over-used and over-crowded and this is the only safe and swimmable spot left for our locals to unwind and appreciate. Shame again on DOT for ignoring this fact in your plan and squeezing the locals out of places that give them a sense of place. (NOTE: I am not talking about the surf spot as it accommodates older folks and is located outside of the break wall).

Your plan to build more and more fuel tanks out toward the LST area is a destructive one. It only shows us how continually insensitive you are to the environment. You should locate those tanks in the area next to Kawaihae Road only.

I am further appalled at your plans to build a small boat harbor that reflects your destructive Honolulu style. We should be learning from Oahu's mistakes by not continuing to build trashy boat harbors that look like the Ala Wai and Kewalo Basin small boat harbors. How shameful! Out of respect to the cultural sites just next to this property, I think the small boat harbor plans should be dumped and instead, the area should be turned into a huge park.

Your plans are harmful and insensitive to the cultural environment and local lifestyle. Please redo them. Thanks,

Josephine Keilipio
(808) 326-7998

420 Waikele Road
Suite 411
Honolulu, Hawaii 96817-4941
Telephone 808 842 1133
Fax 808 842 1977
eMail rmtowill@hawaii.net



R. M. TOWILL CORPORATION
SINCE 1930

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Engineering
Environmental Services
Photogrammetry
Surveying
Construction Management

May 15, 2001

Ms. Josephine Keliipio
Post Office Box 368
Kealahou, Hawaii 96750

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Ms. Keliipio:

Thank you for your letter dated April 23, 2001 to Mr. Glenn Soma of the Department of Transportation in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

With regard to your comment concerning sustainable development, the Department of Transportation, Harbors Division (hereafter Harbors Division) is mandated to provide adequate harbor infrastructure for future increases in demand for facilities. The Department cannot control the level of residents' dependency on imports.

With regard to your comment concerning the planned Liquid Bulk Terminal at Kawaihae Harbor, please note that the location of the Liquid Bulk Terminal parcel fronts Kawaihae Road. The 2020 Master Plan preserves the Pelekane land area of Harbors Division property under cooperative agreement with the U.S. Department of the Interior, National Parks Service. Since that parcel runs along Kawaihae Road, the liquid bulk terminal could not be located there. The current level of design of the liquid bulk terminal calls for the tanks to be set back from the shoreline. Harbors Division acknowledges that there will be greater potential for damage to the environment with increased bulk storage at the harbor. However, any new terminal will be designed, constructed and managed under stringent environmental guidelines that are meant to contain and prevent spills.

With regard to your comment about development of small boat harbors, in which you reference the Ala Wai and Kewalo Basin on Oahu, please be advised that the small boat harbors to the north and south of the commercial harbor at Kawaihae are administered and developed by the State of Hawaii, Department of Land and Natural Resources. Please address your comments regarding the nature of small boat harbor development to the agency which has the authority to respond.

Ms. Josephine Keliipio
May 15, 2001
Page Two

With regard to your comment that "your plans are harmful and insensitive to the cultural environment and local lifestyle," in the subject DEIS, Harbors Division has made every effort to disclose potential harm to the environment from proposed harbor development, and, where necessary, has proposed mitigation measures to minimize environmental and cultural impacts. Some social impacts, such as reduced area where the public can engage in waterfront activities in the coral stockpile, are unavoidable if Harbors Division is to be able to meet its mandate of providing essential commercial harbor infrastructure to the State of Hawaii. The foremost concern of Harbors Division at Kawaihae Harbor is commercial shipping, not public recreation. The military cargo terminal is under Governor's Executive Order to the U.S. Army. Harbors Division has no intention of developing the Army's terminal and the "beach" inside that area.

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Ecotourism
300 Ala Moana Boulevard, Room 3-122
Box 50088
Honolulu, Hawaii 96850

05896 Hawaii 96850
Bogert 1984

APR 23 2001

In reply refer to: ER-01-106

**Glenn Soma
State of Hawaii
Department of Transportation
Harbors Division
79 S. Nimitz Highway
Honolulu, Hawaii 96813**

Re: Draft Environmental Impact Statement for the Hawaii Commercial Harbors 2020 Master Plan, Island of Hawaii, Hawaii

Dear Mr. Soma:

The U.S. Fish and Wildlife Service (Service) has reviewed the March 2001 Draft Environmental Impact Statement (DEIS) for the above referenced project. The project sponsor is the State of Hawaii, Department of Transportation, Harbors Division. The DEIS was prepared by R.M. Towill Corporation. The Service offers the following comments for your consideration.

The purpose of the proposed project is to implement harbor improvements at Hilo Harbor and Kawaihe Harbor on the island of Hawaii. Infrastructure improvements are needed at both harbors to accommodate projected increases in shipping traffic. The State of Hawaii anticipates a significant increase in the number of vessels that dock, off-load and take-on cargo and passengers at these harbors as support for inter-island commerce and the cruise ship industry to

Proposed harbor improvements include the construction of land-based support facilities, construction and modifications of piers and dolphins, and dredging the harbor bottom to accommodate berthing vessels. At Hilo Harbor, the proposed project involves construction of three piers (4, 5 and 6) from concrete; constructing dolphins at the end of piers 2 and 3; dredging the harbor to create pier berths by using cutterhead technology; and constructing land-based terminals and access roads. At Kawaihae Harbor, three new piers would be constructed; the harbor would be dredged to create pier berths, and blasting technology would be used to remove underlying coral surfaces; and land-based terminals and access roads would be constructed.

GENERAL COMMENTS

In general, the Service believes that the DEIS adequately describes the proposed action and the primary fish and wildlife resources located at the proposed project site. However, the Service believes that the DEIS does not fully explore other alternatives to the use of blasting technology that may reduce impacts to fish and wildlife resources. We are concerned that the controlled use of under water explosives to loosen the hardened substrate may accidentally injure or kill federally protected Hawaiian green sea turtles (*Chelonia mydas*), which are known to occur in the vicinity of the proposed project sites. Therefore, we recommend that the DEIS be revised to assess the use of alternative technologies, in place of under water blasting techniques, used to accomplish the same goal and avoid potential impacts to green sea turtles.

Also, we are concerned that not all of the anticipated, project-related impacts to fish and wildlife resources have been adequately addressed in the DEIS. Potential impacts to coral reef resources may result from the proposed in-water construction-related activities. We believe that direct impacts to coral species may result from the construction of the proposed piers and dolphins, as well as from dredging activities to create pier berths. We recommend that the revised DEIS describe the footprint of the proposed piers and dolphins and pier berths in terms of total benthic acreage displaced by the proposed project. Furthermore, we recommend that coral coverage be described within the footprint of each of the proposed project sites. Total acreage and coral coverage of coral resources that occur within the footprint should be described quantitatively for each site. Finally, we recommend that a mitigation plan be developed in cooperation with natural resource agencies (e.g. the Department of Land and Natural Resources/ Division of Aquatic Resources, National Marine Fisheries Service [NMFS] and the Service) and used to compensate for direct impacts to coral-reef resources. We recommend that the proposed mitigation be commensurate with coral-reef resources impacted by the proposed action.

The DEIS does not adequately address the potential for the proposed project to result in the introduction of alien species to the terrestrial and marine environments of Hawaii island and their associated impacts to fish and wildlife resources. We are concerned that an increase in foreign vessels or vessels that may offload cargo may result in the accidental introduction of alien species. We are concerned that passengers aboard foreign cruise ships may accidentally introduce alien plants, insects or animals that could potentially become established and impact native species. We recommend that an education regime be developed to help visitors become aware of the many rare species that are protected by state and federal laws in Hawaii. Also, we recommend that the details of cruise ship inspections for alien species be discussed in the revised DEIS.

We are concerned that alien species introductions could result via cargo containers that arrive from foreign ports or Guam, where invasive species, such as the brown tree snake, could become established and impact native species. We recommend that the revised DEIS describe the details for conducting regular inspections of cargo for invasive alien species. Furthermore, we recommend that specific protocols regarding interdiction and control of the brown tree snake be

described in the revised DEIS.

Also, we are concerned with the potential introduction of marine alien species to both harbors via ballastwater, gray water or hull-growth. Seventy percent of marine alien species in Hawaiian waters have been introduced via hull growth (L. Eldredge pers. comm April, 2001). We are concerned that foreign cruise ships may serve as vectors for species that may potentially become established, outcompete, and displace native Hawaiian marine organisms. We are concerned that invasive species may be introduced from distant temperate regions (S. Apte *et al.* 2000), as well as tropical and sub-tropical locations from around the world (R.A. Englund *et al.* 2000, S.L. Coles *et al.* 1999, DOD Legacy Project # 106 1997). Therefore, we recommend that the revised DEIS include a discussion of protocols that can be used to rank vessels according to their relative risk of introducing marine alien species to Hawaiian waters. The protocols should include a scheme for notifying state and federal agencies when the risk of introduction is high. Agencies would respond by conducting vessel inspections and taking appropriate action to prevent the introduction. Finally, we recommend that these protocols be developed in cooperation with the State of Hawaii's Division of Aquatic Resources, Department of Agriculture, the National Marine Fisheries Service, the U.S. Department of Agriculture, and the U.S. Fish and Wildlife Service.

SPECIFIC COMMENTS

Pg. 2-22, 2.5.1 Interisland Terminal Facilities Paragraph 4, Sentence 1: The DEIS states that "A typical general cargo facility such as an interisland terminal has berths capable of accommodating vessels up to 800 feet in length and maximum draft of 35 feet, although interisland operations at the two subject harbors are served by barges that currently measure only approximately 350 feet." We do not understand the purpose for constructing berths to accommodate vessels up to 800 feet in length when you state that vessels of only 350 feet may use them. We recommend that the revised DEIS clarify this point.

Pg. 2-25, 2.5.5 Construction of Piers and Dolphins - Hilo Harbor Projects Paragraph 4, Sentence 1: The DEIS states that "The 2020 Master Plan calls for construction of dolphins at the end of Piers 2 and 3 and proposed Piers, 4, 5 and 6." There is no description of the relative dimensions of each pier or dolphin. Since the construction of these piers and dolphins may impact coral reef resources within the harbor, we recommend that the revised DEIS provide a description of the footprint and dimensions of the proposed piers.

Pg. 2-25, 2.5.5 Construction of Piers and Dolphins - Kawaihae Harbor Projects Paragraph 5, Sentence 1: The DEIS states that "The 2020 Master Plan pier projects at Kawaihae include the addition of three new piers." However, this document does not describe the relative dimensions of each pier. Since the construction of these piers may impact coral reef resources within the harbor, we recommend that the revised DEIS provide a description of the footprint and dimensions of the proposed piers.

Pg. 2-24, Table 2, Marine Biological Survey Summary - Hilo Harbor, September 2000 This table lists the status of marine organisms by federally protected status "threatened," "endangered," and then by group such as "invertebrates," "fish," and "fish." However, this table does not indicate the number of species observed that were indigenous or endemic to Hawaii. Since you indicate this status for terrestrial organisms, we recommend that you make this document consistent in its treatment of biological organisms and identify whether any of the marine species observed during the survey are considered indigenous or endemic to Hawaii.

Pg. 2-24, Table 10, Marine Biological Survey Summary - Kawaihae Harbor, September 2000 This table lists the status of marine organisms by federally protected status "threatened," "endangered," and then by group such as "invertebrates," "invertebrates," and "fish." However, this table does not indicate the number of species observed that were indigenous or endemic to Hawaii. Since you indicate this status for terrestrial organisms, we recommend that you make this document consistent in its treatment of biological organisms and identify whether any of the marine species observed during the survey are considered indigenous or endemic to Hawaii.

Pg. 3-27, Kawaihae Harbor Paragraph 1, Sentence 4: The DEIS states that, "It is likely that the proposed development/expansion within the harbor basin will continue this transition to fewer near-shore coastal invertebrates and fishes, with generally reduced overall diversity." We interpret this statement to indicate that negative impacts can be anticipated for the marine organisms that occur at the proposed project site. In contrast, paragraph 3 Sentence 5: "That 'Coral may similarly regenerate in the future following proposed dredging of harbor areas.' If the previous statement holds true, then this statement may not be accurate since fewer species of coral may be expected to colonize the benthic substrate after the harbor has been dredged. Therefore, the proposed action may have a negative affect upon coral resources that occur within the project site and the revised DEIS should assess this impact.

Pg. 3-35, Hull-Growth Paragraph 3, Sentence 2: The DEIS states that "Hull-growth tends to occur when ships stay at anchor or in harbors for extended periods of time, giving organisms a chance to establish themselves." S. Apte (*et al.* 2000) demonstrated that the smooth shelled blue mussel (*Mytilus galloprovincialis*), alien to Hawaiian waters, became established within the ballast tank of a submarine that was moored in Pearl Harbor, shortly after the mussel arrived on the hull of the U.S.S. Missouri in the summer of 1998. Therefore, we recommend that this statement be modified to indicate that alien species may need little time to transfer from host vessels to other vessels and spread to other harbors.

SUMMARY

The Service believes that the DSEIS does not adequately assess all inwater construction and dredging-related impacts to coral-reef resources. Furthermore, we do not believe that adequate mitigation for the potential loss of coral-reef resources has been identified in the DEIS.

We also believe that the introduction of alien species may continue to pose threats to terrestrial

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May 31, 2001

Mr. Paul Henson, Field Supervisor
Ecological Services
United States Department of the Interior
300 Ala Moana Boulevard, Room 3-122
Box 50088
Honolulu, Hawaii 96850

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Mr. Henson:

Thank you for your letter of April 23, 2001 which was received by the Department of Transportation, Harbors Division in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

Responses to the section of your letter entitled "General Comments:"

Use of Blasting Technology

With regard to concerns about underwater blasting, Harbors Division will explore the feasibility of using other technologies as an alternative to blasting, such as the use of cuttersheads, drag line operations or roadcutters, to dredge designated areas. Other alternatives to blasting, such as technology using pre-drilling and expansion gels to split rock, will also be considered. Construction methodology will attempt to minimize the possibility of inadvertent taking of any green sea turtles.

Footprint for Proposed Piers and Dolphins

The FEIS will provide the relative dimensions of proposed piers and dolphins as follows. Please refer to Figure 8 and Figure 9 of the DEIS for the location of these piers and dolphins.

Hilo Harbor

- Pier 2-3 Dolphins: six dolphins will be placed in line with existing Piers 3 at fifty-foot intervals, to total an extension of 312.5 feet from the end of Pier 3. Dolphins will be 25 by 30 foot concrete platforms supported by concrete piles. A pile-supported catwalk will join the dolphins and be designed for use by heavy equipment such as forklifts.

Mr. Paul Henson
May 31, 2001
Page Two

- Pier 4 will serve the proposed interisland terminal at Hilo Harbor. The pier will be of concrete platform on piles or bulkhead with sheet piling construction (or a combination of both). The length of Pier 4 is 1,000 feet.
- Piers 5 and 6 will be 1,000 feet in length. The width of the combined piers will be 200 feet.

Kawaihae Harbor

- Pier 1 The berth at this existing pier will require dredging from the current 35 feet to a depth of 40 feet.
- Pier 2a This existing pier will support the proposed overseas container terminal. The major seaward change will be dredging the berth from the existing 35 feet to 40 feet.
- Pier 2a Extension This pier extension will involve construction of a 450-foot, pile-supported pier and dredging of the berth to 40 feet.
- Pier 3 This will be a new 1,000 foot pier either of concrete platform on piles or bulkhead with sheet piling construction (or a combination of both).
- Pier 4 Proposed pier 4 will be 500 by 100 feet. The construction type will be concrete platform on piles.

Impacts to Coral Reef Resources

Hilo Harbor. The marine biological assessment performed at Hilo Harbor for the 2020 Master Plan concluded there are virtually no coral reef resources within the harbor that will be impacted. As described in the report, only three species of corals were sighted in the survey, *Pocillopora damicornis* and *Montipora capitata* in the vicinity of Pier 4, where coral growth was minimal and *Psammacora verrilli* in the vicinity of the Pier 5-6 alignment, where only a single colony was observed. Any impact of pier construction on the very scarce corals and reef organisms would be minimal.

Kawaihae Harbor. Kawaihae Harbor is no longer a coral reef area. The commercial harbor was formed when portions of a coral reef were destroyed and the harbor basin was dredged. Extant coral reef resources are restricted to the undredged edge of the inner harbor where no construction is planned. This area is shown in DEIS Figure 17, "Locations of Undredged Reef, Kawaihae Harbor." The marine biologist conducting the survey of Kawaihae Harbor concluded much

of the area where piers are proposed is presently rubble-sand bottom with little or no coral present. Because of the unusually low degree of turbidity in the harbor, certain corals have regenerated on vertical pier surfaces since the harbor was dredged. It is quite possible that the vertical, hard surfaces to be created by pier construction also will provide opportunity for additional coral growth. The "transition to fewer coral reef invertebrates and fish and overall reduced diversity" one might expect has not occurred so far. The relative abundance of harbor versus reef communities that will result from the harbor development is therefore only conjectural from the present available information, and mitigation for potential loss of coral reef resources is unrealistic.

Introduction of Alien Species

The Department of Transportation, Harbors Division shares your concern about the introduction of alien species. However, Harbors Division does not enjoy regulatory authority over such introductions (see Table 11 in the DEIS, entitled "Regulatory Oversight of Alien Species Control and Introduction in Hawaii"). Because Harbors Division has no regulatory authority, information on "details of cruise ship inspections" by other agencies will be limited to discussion and Table 11 in the DEIS.

With regard to alien species that might be resident in ballast water, Harbors Division obtained a recently-completed study by L.S. Godwin and L.G. Eldredge entitled South Oahu Marine Invasions Shipping Study (SOMISS), published by Bishop Museum in February 2001. Based on information in that publication, the FEIS will contain this additional discussion [words in the quote that are not bold or italicized indicate original language in the DEIS]: "*A recent study of marine indigenous (introduced) species in Hawaii concluded the following: 'Hawaii is a net importer of bulk cargo and manufactured goods, and therefore receives less ballast water than regions that are net exporters of these items' (Godwin and Eldredge, 2001). This is because ballast water is taken on in the loading rather than unloading phase of port operations. According to the Hilo Harbormaster, ships do not discharge ballast water in or near either of the subject harbors. This is consistent with the fact that the harbors' cargo operations are focused primarily in the offloading process.*"

Ranking of Vessels

As stated earlier, Harbors Division has no regulatory authority with regard to alien species introductions. Harbors Division will assist regulatory agencies with the ranking of incoming vessels according to their risk of introducing alien species. Harbors Division agrees with your proposed list of participating agencies, i.e., State of Hawaii, Division of Aquatic Resources, National Marine Fisheries Service, U.S. Department of Agriculture, and U.S. Fish & Wildlife Service.

Responses to comments in the section of your letter entitled "Specific Comments:"

DEIS, Page 2-22, 2.5.1 Interisland Terminal Facilities Paragraph 4, Sentence 1: You noted "We do not understand the purpose of constructing berths to accommodate vessels up to 800 feet in length when you state that vessels of only 350 feet may use them." To clarify this point, the FEIS will state: "*Although individual barges are generally 350 feet in length, they are often brought into the harbor in pairs with accompanying tugboats, thus requiring a longer pier. In addition, larger vessels such as liquid bulk tankers will need to be berthed at proposed Pier 4 to gain access to liquid bulk terminal facilities.*"

Page 2-25, 2.5.5 Construction of Piers and Dolphins - Hilo Harbor AND Page 2-25, 2.5.5 Construction of Piers and Dolphins - Kawaihae Harbor Please refer to the responses to your General Comments under "Footprint of Proposed Piers and Dolphins" and "Impacts to Coral Reef Resources" above.

Pg. 3-24, Table 9, Marine Biological Survey Summary - Hilo Harbor, September 2000 AND Pg. 3-24, Table 10, Marine Biological Survey Summary - Kawaihae Harbor, September 2000

You indicated these tables do not indicate which species are indigenous or endemic to Hawaii. You also recommend this information be added to make the marine biology consistent with the presentation of the terrestrial biology survey. The tables have been updated in the FEIS to differentiate between introduced, indigenous and endemic species. Tables 1 and 2 from DEIS Appendix B have been revised by marine biology consultant AECOS, Inc., to reflect introduced or cryptogenic (uncertain origin) organisms, those native to Hawaii which are indigenous (found elsewhere in the Pacific) and endemic (found only in the Hawaiian Islands). The revised tables will be included in the FEIS as a revision to Appendix B.

[EDITOR'S NOTE: "Table 9" in this letter is found in Appendix E as Table 5. Table 2 in this letter is found as Table 10 in Appendix E. Table 1 attached to this letter is the same as Table 5 in Appendix E; Table 2 attached to this letter is the same as Table 9 in Appendix E.]

Mr. Paul Henson
May 31, 2001
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Pg. 3-27, Kawaihae Harbor, Paragraph 1, Sentence 4

Your comments deal with deterioration vs. regeneration of coral resources within Kawaihae Harbor. Please see the response to your General Comments under "Impacts to Coral Reef Resources."

Pg. 3-35, Hull Growth, Paragraph 3, Sentence 2;

Your comment concerns the length of time in which hull-growth can occur. In the FEIS we will modify the sentence as follows: "Alien species may need little time to transfer from host vessels to other vessels and spread to other harbors. However, the amount of time needed for transfer of organisms is a point of conjecture, even among the experts on this subject."

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Charles T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

Attachment

Table 1. Organisms recorded on survey of Kawaihae Harbor,
September 16-17, 2000

Taxa 1	Taxa 2	Genus Species	Author, Date	Pier 1	Pier 2a	Pier 2b	Pier 3-5	Jetty
Rhodophyta	Coralinaceae	<i>Hydroidia reinholdii</i>	(Webster & Foster) Foster (Hyporhynch) Foster					x
Porifera		<i>Porolithon onkodes</i>	(Ridley, 1884)		x			x
	Callyspongiidae	<i>Callyspongia diffusa</i>	(Ridley, 1884)					
	Microcionidae	<i>Clathria</i> sp.	Schmidt, 1882	x	x			
	Dysideidae	<i>Dysidea</i> cf. <i>avara</i>	(de Laubenfels, 1950)	x				
	Myxillidae	<i>Holothria protea</i>	Ridley, 1884	x				
	Spirastrellidae	<i>Spirastrella vagabunda</i>						
Hydrozoa	Pennariidae	<i>Pennaria disticha</i>	Gottlieb, 1820	x				
Anthozoa	Pocilloporidae	<i>Pocillopora meandrina</i>	Dana, 1852	x	x			
	Pocilloporidae	<i>Pocillopora eydouxi</i>	Mann-Edwards & Harmer, 1960	x				
	Pocilloporidae	<i>Pocillopora damicornis</i>	(Linnaeus, 1758)	x	x			
	Acroporidae	<i>Montipora capitata</i>	(Dana, 1846)	x				
	Poritidae	<i>Montipora patula</i>	Verrill, 1864	x				
		<i>Porites compressa</i>	Dana, 1846	x	x			
		<i>Porites lobata</i>	Dana, 1846	x	x			
		<i>Porites evermanni</i>	Vaughan, 1907	x	x			
	Agariciidae	<i>Parona varians</i>	Verrill, 1864	x	x			
	Fungiidae	<i>Fungia scutaria</i>	Lamarck, 1801	x				
	Faviidae	<i>Cyphastrea ocellina</i>	(Dana, 1846)	x				
	Fa	<i>Lepidastrea purpurea</i>	Dana, 1846	x				
	Anipathidae	<i>Carrispathes arguina</i>	Dana, 1846	x				
Polychaeta	Amphinomidae	<i>Eurythoe complanata</i>	(Pallas, 1766)					
	Chaetopteridae	<i>Chaetopterus</i> sp.	(Claparede, 1870)	x				
		<i>Mesochaetopterus</i> cf. <i>sagittatus</i>						
	Terebellidae	<i>Lolima medusa</i>	(Savigny, 1818)	x	x			
	Sabelidae	<i>Sabelia</i> sp.	(Gube, 1878)	x	x			
	Serpulidae	<i>Spectabilis</i>	(Huxley, 1855)	x				
		<i>Spirobranchius giganteus</i>	(Pallas, 1776)	x				
Crustacea	Cirripedia	<i>Balanus reticulatus</i>	Unomi, 1960	x				
		<i>Chthamalus proteus</i>	Dando & Southward, 1960	x	x			
	Stomatopoda	<i>Stomatopoda</i> sp.	Rathbun, 1907	x				
	Grapsidae	<i>Grapsus tenuicrustatus</i>	(Herbst, 1783)	x				
Gastropoda	Neritidae	<i>Nerita picea</i>	(Reich, 1841)	x				
	Cassidae	<i>Charonia tritonis</i>	(Linn., 1758)					
	Littorinidae	<i>Littoraria pinnata</i>	(Wood, 1828)	x				
	Vermetidae	<i>Euraster tulipa</i>	(Chem, 1843)	x				
	Cypraea	<i>Cypraea caputserpentis</i>	Linnaeus	x				
	Cypraea	<i>Cypraea chinensis</i>	Gmelin, 1791	x				
	Hippuritidae	<i>Hippurix</i> sp.		x				
Opisthobranchia	Chromodorididae	<i>Hypselodoris infurcata</i>	(Ruppell & Leuckart, 1828)	x				

Table 1 (continued).

Taxa 1	Taxa 2	Genus Species	Author, Date	Pier 1	Pier 2a	Pier 2b	Pier 3-5	Jetty
Bivalvia	Ostreidae	<i>Crassostrea gigas</i>	(Linnaeus, 1758)	x	x			
	Spondyliidae	<i>Dendostrea sandwicensis</i>	Sowerby, 1871			x		
Cephalopoda	Octopodiidae	<i>Octopus cyanea</i>	Gray, 1849		x			
Ectoprocta	Vesiculariidae	<i>Amathia distans</i>	Buch, 1885		x			
	Diaperoeciidae	<i>Diaperoecia liliifolia</i>						
Echinoidea	Diademidae	<i>Diadema paucispinum</i>	Agassiz, 1863			x		
		<i>Echinolirix diadema</i>	Linnaeus, 1758			x		
		<i>Echinolirix callimaris</i>	(Pallas, 1774)			x		
	Toxopneustidae	<i>Triopneustes gratilla</i>	(Linnaeus, 1758)			x		
	Echinometridae	<i>Echinometra mathaei</i>	(Blainville, 1825)			x		
		<i>Echinostrephus oculatus</i>	A. Agassiz, 1863			x		
		<i>Heterocentrotus</i>	Linnaeus, 1758			x		
		<i>mammillatus</i>						
	Holothuriidae	<i>Actinopyga mauritiana</i>	(Quoy & Gaimard, 1833)			x		
Urochordata	(Ascidacea)	<i>Didemnum</i> sp.				x		
		<i>Herdmania momus</i>	(Savigny, 1816)			x		
	Total Invertebrate Taxa			31	26	13	25	19
Osteichthyes	Synbranchidae	<i>Saurida flamma</i>	Wagner, 1902			x		
	Belontiidae	<i>Platybota argalus</i>	(Bennett, 1832)			x		
	Holocentridae	<i>Sargocentron</i> sp.				x		
	Aulostomidae	<i>Aulostomus chinensis</i>	(Linnaeus, 1766)			x		
	Fistulariidae	<i>Fistularia commersonii</i>	Ruppell, 1838			x		
	Cliniidae	<i>Paracirrhites forsteri</i>	(Bloch & Schneider, 1801)			x		
		<i>Paracirrhites arcatus</i>	(Cuvier, 1829)			x		
	Kuhliidae	<i>Kuhlia sandvicensis</i>	(Schlegel, 1876)			x		
	Carangidae	<i>Caranx melampygus</i>	Cuvier and Valenciennes, 1833			x		
		<i>Caranx sexfasciatus</i>	Quoy and Gaimard, 1824			x		
	Lutjanidae	<i>Lutjanus fulvus</i>	(Quoy and Gaimard, 1824)			x		
		<i>Lutjanus kasmira</i>	(Forsk., 1775)			x		
	Mulidae	<i>Mulichthys flavolineatus</i>	(Lacépède, 1801)			x		
		<i>Mulichthys varicostatus</i>	(Valenciennes, 1831)			x		
		<i>Parupeneus multifasciatus</i>	Quoy & Gaimard, 1824			x		
		<i>Parupeneus porphyreus</i>	Jenkins, 1903			x		
	Kyphosidae	<i>Kyphosus bigibbus</i>	Lacépède, 1802			x		
		<i>Chaetodon</i>	Gray, 1833			x		
		<i>quadrimaculatus</i>						
	Chaetodontidae	<i>Chaetodon auriga</i>	Forsk., 1775			x		
		<i>Chaetodon fremblii</i>	Bennett, 1829			x		
		<i>Chaetodon lunula</i>	(Lacépède, 1803)			x		
		<i>Chaetodon miliaris</i>	Quoy & Gaimard, 1828			x		
		<i>Cornalissinus</i>	Cuvier, 1831			x		
		<i>C. quadrimaculatus</i>	Gray, 1833			x		
		<i>Chaetodon reliculatus</i>	Cuvier, 1831			x		

Table 1 (continued).

Taxa 1	Taxa 2	Genus Species	Author, Date	Pier 1	Pier 2a	Pier 2b	Pier 3-5	Jetty
	Chaetodontidae	<i>Forcipiger flavissimus</i>	Jordan and McGregor, 1898	x				
	Pomacentridae	<i>Abudefduf vaigensis</i>	(Quoy & Gaimard, 1824)		x			
		<i>Abudefduf abdominalis</i>	Forster, 1773		x			
		<i>Chromis hanui</i>	Forster, 1773					
		<i>Dascyllus albisella</i>	Forster, 1773					
		<i>Pteroglyphidodon johnstonianus</i>	Valenciennes, 1835					
	Serranidae	<i>Stegastes fasciatus</i>	(Ogilby, 1839)					
		<i>Cephalopholis argus</i>	Bloch & Schneider, 1835					
		<i>Bodianus bimaculatus</i>	(Valenciennes, 1839)					
	Labridae	<i>Gomphosus varius</i>	Lacépède, 1801					
		<i>Labridae phillipinus</i>	Randall, 1960					
		<i>Thalassoma duportii</i>	(Quoy and Gaimard, 1824)					
	Scaridae	<i>Scarus</i> sp. (juv.)						
	Acanthuridae	<i>Acanthurus nigrofasciatus</i>	(Forsk., 1775)					
		<i>Acanthurus triostegus</i>	(Linnaeus, 1758)					
		<i>Acanthurus nigro</i>	Valenciennes, 1835					
		<i>Acanthurus blochii</i>	Valenciennes, 1835					
		<i>Acanthurus achilles</i>	Shaw, 1803					
		<i>Acanthurus olivaceus</i>	Bloch & Schneider, 1801					
		<i>Acanthurus dussumieri</i>	Cuvier & Valenciennes, 1835					
		<i>A. leucopareus</i>	(Jenkins, 1903)					
		<i>Ctenochaetus strigosus</i>	(Bennett, 1828)					
		<i>Naso lateralis</i>	(Bloch & Schneider, 1801)					
		<i>Naso brevirostris</i>	(Valenciennes, 1835)					
		<i>Zabrusoma flavescens</i>	(Bennett, 1828)					
	Zanclidae	<i>Zanclus cornutus</i>	(Linnaeus, 1758)					
	Ostracodontidae	<i>Ostracodon meleagris</i>	Shaw and Hutton, 1786					
		<i>Aroliron hispidus</i>	(Linnaeus, 1758)					
		<i>Canthigaster jactator</i>	(Jenkins, 1901)					
	Diodontidae	<i>Diodon holocanthus</i>	Linnaeus, 1758					
	Balistidae	<i>Melichthys vidua</i>	(Schneider, 1844)					
		<i>Melichthys niger</i>	(Bloch, 1765)					
		<i>Rhinocanthus aculeatus</i>	(Linnaeus, 1758)					
		<i>Sufflamen bursa</i>	(Bloch & Schneider, 1801)					
		Total Fish Taxa		29	14	20	34	35
Reptilia	Chelonidae	<i>Chelonia mydas</i>						
		Total Taxa		60	41	33	58	55

† - Species thought to be introduced (seen in Hawaiian Islands); All others are considered to be native species, with those in bold representing the endemics (found only in the Hawaiian Islands).

Table 2. (continued).

Taxa 1	Taxa 2	Genus Species	Author, Date	Radio Bay	Pier 4	Pier 5-6	Pier 2-3
Osteichthyes	Muraenidae	<i>Gymnothorax flavimarginatus</i>	(Ruppel, 1830)	x			
	Atherinidae	<i>Pranestes insularum</i>	Jordan and Everman, 1903	x			
	Carangidae	<i>Caranx</i> sp.					x
	Lutjanidae	<i>Caranx melampygus</i>	Cuvier and Valenciennes, 1833				x
	Mulidae	<i>Lutjanus fulvus</i>	(Quoy and Gaimard, 1824)		x		
		<i>Lutjanus kasmira</i>	(Forsk., 1775)		x		
		<i>Mulidichthys varicostatus</i>	(Valenciennes, 1831)		x		
		<i>Parupeneus multioculatus</i>	Quoy & Gaimard, 1824		x		
		<i>Parupeneus porphyreus</i>	Jenkins, 1903		x		x
	Chaetodontidae	<i>Chaetodon auriga</i>	Forsk., 1775		x		
		<i>Chaetodon frambilli</i>	Bennett, 1829				
		<i>Chaetodon lunula</i>	(Lacepède, 1803)				x
		<i>Chaetodon milleris</i>	Quoy & Gaimard, 1828		x		
		<i>Heniochus diphreutes</i>	Jordan, 1904				x
	Pomacentridae	<i>Abudefduf axodromalis</i>	(Quoy & Gaimard, 1824)				
		<i>Dascyllus abissella</i>	Gill, 1863		x		x
		<i>Stegastes fasciatus</i>	(Ogilby, 1889)		x		
		<i>Scarus</i> sp. (rev.)					
	Scaridae	<i>Bathypogon fuscus</i>	(Ruppel, 1828)				
	Gobiidae	<i>Acanthurus lineatus</i>	(Linnaeus, 1758)		x		x
	Acanthuridae	<i>Acanthurus blochii</i>	Valenciennes, 1835		x		x
		<i>Acanthurus dussumieri</i>	Cuvier & Valenciennes, 1835				
		<i>Zandrus cornutus</i>	1835				
	Zanclidae	<i>Zandrus cornutus</i>	(Linnaeus, 1758)		x		x
	Tetraodontidae	<i>Arothron hispidus</i>	(Linnaeus, 1758)		x		x
		Total Fish Taxa		10	10	6	9
Reptilia	Chelonidae	<i>Chelonia mydas</i>		26	32	18	15
		Total Taxa					

† - Species thought to be introduced (alien to Hawaiian Islands); All others are considered to be native species, with those in bold representing the endemics (found only in the Hawaiian Islands).

Table 2. Organisms recorded on survey of Ilio Harbor, September 23, 2000

Taxa 1	Taxa 2	Genus Species	Author, Date	Radio Bay	Pier 4	Pier 5-6	Pier 2-3
Chlorophyta	Caulerpaceae	<i>Caulerpa racemosa</i>	(Forsk.) J. Agardh		x		
		<i>Cladophora fascicularis</i>	(Merle) Kützinger		x		
Phaeophyta		<i>Cladophora patula</i>	Sakai		x		
		<i>Lobophora variegata</i>	(Linnaeus) Wormskj.		x		
Rhodophyta	Sargassaceae	<i>Sargassum</i> sp.			x		
	Rhodomeleaceae	<i>Amansia glomerata</i>	C. Agardh		x		
	Coralinaceae	<i>Porolithon onkodes</i>	(Hayward) Fensholt		x		
		<i>Marietia fragilis</i>	Harvey		x		
		<i>Spyridia flamenlosa</i>	(Wulfen) Harvey		x		
		Total Algae Taxa		1	7	3	0
Porifera	Calcyspongiidae	<i>Calcyspongia cf. diffusa</i>	(Ridley, 1894)		x		
	Microcionidae	<i>Clathria</i> sp.			x		
	Dysideidae	<i>Dysidea cf. avara</i>	Schmidt, 1902		x		
	Desmacellidae	<i>Biemna fistulosa</i>	(Topsent, 1897)		x		
	Myxillidae	<i>Heterochela prolata</i>	(de Laubenfels, 1950)		x		
		Blue-green sponge			x		
		Pink sponge			x		
		Red sponge			x		
Hydrozoa	Pennariidae	<i>Pennaria disticha</i>	Gottlieb, 1820				
	Aglaopheniidae	<i>Gymnangium hians</i>	(Buck, 1852)				
Anthozoa	Octocorallidae	<i>Arbacia bicolor</i>	(Nutting, 1908)				
	Telestidae	<i>Caripia rissel</i>	Duchassaing & Michaud, 1860				
	Pocilloporidae	<i>Pocillopora damicornis</i>	(Linnaeus, 1758)				
	Acroporidae	<i>Montipora capitata</i>	(Dana, 1846)				
	Siderastreae	<i>Pseudomocora verrilli</i>	Vauphan, 1907				
Polychaeta	Chaetopteridae	<i>Chaetopterus</i> sp.					
	Sabellidae	<i>Sabellasteria speciosa</i>	(Götte, 1878)				
	Siribidae						
Crustacea	Cirripedia	<i>Balanus reticulatus</i>	Unom, 1960		x		x
		<i>Balanus eburneus</i>	Gould 1841		x		x
		<i>Chthamalus proleus</i>	Dando & Southward, 1980		x		
	Panuliridae	<i>Panulirus penicillatus</i>	(Olivier, 1781)		x		
	Grapsidae	<i>Grapsus tenuicrustatus</i>	(Herbst, 1783)		x		
Gastropoda	Vermelidae	<i>Eulalia fulva</i>	(Chenu, 1843)				
	Siphonariidae	<i>Siphonaria normalis</i>	Gould, 1846				
	Ischnochitonidae	<i>Ischnochiton petaloides</i>	(Gould, 1846)				
Bivalvia	Mytilidae	<i>Brachidontes crebristratus</i>	Conrad				
	Ostreidae	<i>Crassostrea gigas</i>	(Thunberg, 1793)		x		
Ectoprocta	Schizoporellidae	<i>Schizoporella</i> sp.					
		Total Invertebrate Taxa		15	15	9	6

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STATE OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOMELANDS

PO BOX 109
HONOLULU, HAWAII 96810

DAYTIME C. 800N
COMM-FAC
HAWAIIAN HOMELANDS
PHONE NO. 842-4186
FAX NO. 842-1937

April 23, 2001

To: The Honorable Brian K. Minaai, Director
Department of Transportation

Attn: Glenn Soma, Harbors Division (Fax 587-2504)

From: Raynard C. Soon, Chairman
Hawaiian Homes Commission

Subject: Hawaii Commercial Harbors 2020 Master Plan, Draft
Environmental Impact Statement, Island of Hawaii

Thank you for allowing our review of the subject report for development of the two deep-draft harbors at Hilo and Kawaihae. We offer the following comments:

More than 90% of all goods and supplies entering and leaving the Big Island go through these commercial harbors. These economic gateways are vital to the survival of the county, and optimizing their use and development is a key factor to future prosperity.

The Department of Hawaiian Home Lands (DHHL) administers Hawaiian home lands tracts in close proximity to both Hilo Harbor (1,670 acres at Keaukaha) and Kawaihae Harbor (10,153 acres at Kawaihae-1). We anticipate positive impacts from opportunities that can be provided for our homesteaders and economic revenue-producing uses of our lands from development and operations at the harbors.

The State of Hawaii relies on the Department of Transportation (DOT) to develop harbor facilities that accommodate the needs of the maritime industry in ways that maximize the benefits to the local and state economies. Comprehensive and accurate forecasts of cargo and passengers should be the bases for planning.

The Honorable Brian K. Minaai
April 23, 2001
Page 2

Cruise ship passengers are "real tourists" who will be out to see the sights and spend money. The economic benefits to local enterprises could be similar to that described in the article from Hawaii Business magazine of February 2001 entitled "Their Ships Have Come in; Kauai Merchants are Reaping Benefits of a Growing Cruise Industry." Assessments should be made of the losses that will be suffered if the harbors are unable to handle cargo and cruise ship demands. Overgrowth, on the other hand, could cause many adverse impacts if infrastructure and facilities are not provided to handle the increased traffic effectively and efficiently.

For example, a ship passenger terminal could include space for local commercial and cultural concessions. Adequate restrooms and other comfort facilities should be provided. The layout should provide for safe and easy vehicular access and loading so that visitors can go into the nearby areas or go on tours. Proposals from other agencies and the private sector should be sought.

The harbor cargo projections are general and do not specify that segment attributed to forest industry products. Please include more detailed projections in the final report.

If you have any questions regarding our comments, please call Darrell Yagodich of our Planning Office at 586-3836.

c: OEQC (Fax 586-4186)
RUTC (Fax 842-1937)

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May 15, 2001

Mr. Raynard C. Soon, Chairman
Hawaiian Home Lands Commission
State of Hawaii
Department of Hawaiian Home Lands
Post Office Box 1879
Honolulu, Hawaii 96805

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Mr. Soon:

This is in response to your memorandum to the Department of Transportation dated April 23, 2001, which provided comments on the above-referenced Draft Environmental Impact Statement.

The Department of Transportation, Harbors Division (hereafter Harbors Division) appreciates your acknowledgement of the vital nature of harbors and the need to optimize their use and development to future prosperity. Harbors Division is aware that harbor improvements have the potential for positive impacts to neighboring homesteaders as well as the potential for revenue-producing uses of Hawaiian Home Lands from development and operations at the harbors.

Harbors Division agrees with the need for comprehensive and accurate forecasts of cargo. Harbors Division is confident in the methodology used to create projections, as described on page 2-12 of the DEIS. With regard to comprehensive projections of passengers, Harbors Division will continue to monitor projections for cruise ship arrivals developed by the State of Hawaii, Department of Business, Economic Development and Tourism, as discussed on page 2-14 of the DEIS. In addition, projections will also carefully consider trends in actual cruise ship bookings at Hilo Harbor and Kawaihae Harbor such as those described on page 2-15 of the DEIS.

With regard to the allocation of space for forest industry products, this is shown in the DEIS in Table 2 as "Dry Bulk Storage." Estimates of harbor space needed to store forest products at the subject harbors were determined through consultation with representatives of the Island of Hawaii forest products industry. To clarify this, the FEIS will revise the

Mr. Raynard Soon
May 15, 2001
Page Two

Table 2, "Dry Bulk Storage" to "Dry Bulk Storage (Timber Products, Cement and Scrap Metal)."

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FT. SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF

April 23, 2001

Regulatory Branch

Mr. Glenn Soma
Harbors Division
Department of Transportation
State of Hawaii
79 S. Nimitz Highway
Honolulu, Hawaii 96813

Dear Mr. Soma:

Thank you for providing a review copy of the Draft Environmental Impact Statement (DEIS) for the Hawaii Commercial Harbors 2020 Master Plan, Island of Hawaii, Hawaii. The proposed action involves Harbors Division implementation of various improvements at Hilo Harbor and Kawaihae Harbor. We have reviewed the DEIS with respect to the Corps' authority to issue Department of the Army (DA) permits under Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403), Section 404 of the Clean Water Act (33 USC 1344), and Section 103 of the Marine Protection, Research, and Sanctuaries Act of 1972 (33 USC 1413).

Based on the information provided in the DEIS, I have tentatively determined that the proposed improvements at Hilo Harbor and Kawaihae Harbor will require a DA permit. Final determinations of permit requirements can be made when specific plans for the various improvements are developed.

Please note that the Corps of Engineers does not have any separate "Approval of Drainage Outfall" authority as suggested by statements on pages 5-1 and 6-1 of the DEIS, although construction of a drainage outfall or other structure in waters of the U.S. may require authorization by a DA permit issued pursuant to one or more of the above-cited Acts.

Should you have questions regarding these comments, please contact Mr. Peter Galloway of my staff at 438-8416 (FAX 438-4060). Mailed correspondence concerning the proposed action should be addressed to: Regulatory Branch

-2-

(CEPOH-EC-R/P. Galloway); U.S. Army Engineer District, Honolulu; Building 230; Fort Shafter, Hawaii 96858-5440. File number 200100161 has been assigned to this project.

Sincerely,

George P. Young

George P. Young, P.E.
Chief, Regulatory Branch

Copy Furnished:

Ms. Genevieve Salmonson, Office of Environmental Quality Control, 235 S. Beretania Street, Suite 702, Honolulu, HI 96813

✓ Mr. Chester T. Koga or Ms. Gail W. Atwater, R.M. Towill Corp., 420 Waiakamilo Road, Suite 411, Honolulu, HI 96817

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Mr. George Young
May 15, 2001
Page Two

If you have any further questions please do not hesitate to call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

May 15, 2001

Mr. George P. Young, P.E.
Chief, Regulatory Branch
Department of the Army
U.S. Army Engineer District, Honolulu
Fort Shafter, Hawaii 96858-5440

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Mr. Young:

Thank you for your letter dated April 23, 2001 to Mr. Glenn Soma of the Department of Transportation, Harbors Division in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

The Department of Transportation, Harbors Division acknowledges the requirement for Department of the Army permits for improvements at Hilo Harbor and Kawaihae Harbor proposed under the Hawaii Commercial Harbors 2020 Master Plan.

With regard to statements on pages 5-1 and 6-1 of the DEIS concerning a separate "Approval of Drainage Outfall," in the FEIS we have modified page 5-1 to strike the sentence "Other planned improvements could require an Approval of Drainage Outfall by ACOE." The table on page 6-1 also has been modified according to your comments. Per consultation with your staff, approval of a drainage outfall, as well as action under the Rivers and Harbors Act, would fall under the umbrella of a Department of the Army permit and therefore do not have to be listed as separate approvals.



University of Hawai'i at Mānoa

Environmental Center
A Unit of Water Resources Research Center
Krauss Annex 19 • 2500 Dole Street • Honolulu, Hawaii 96822
Telephone: (808) 956-7361 • Facsimile: (808) 956-3380

April 23, 2001
RE: 0714

Mr. Glenn Soma
State Department of Transportation
Harbors Division
79 South Nimitz Highway
Honolulu, Hawaii 96813

Dear Mr. Soma:

Hawaii's Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement
South Hilo, South Kohala, Hawaii

The State of Hawaii, Department of Transportation, Harbors Division, proposes to implement harbor improvements at Hilo Harbor and Kawaihae Harbor. Some of the proposed improvements at Hilo Harbor include the construction of new piers, dredging alongside piers, new sheds, access roads, utilities, a new passenger terminal, and a new ocean research facility. The timing of these various improvements ranges from the years 2002 to 2015. Similar improvements are proposed for the Kawaihae Harbor. The purpose of the Harbors Master Plan 2020 is to accommodate the increases of shipping and cargo traffic proposed for the harbors, as well as to meet the demand for Hawaii's expanding cruise ship industry. The cost for this project has a range of \$150-300 million.

This review was conducted with the assistance of Ed Laws, Oceanography; Hans Van Tilburg, Maritime Archaeology; and Renee Thompson, Environmental Center.

General Comments

The Hawaii Commercial Harbors 2020 Master Plan seems justifiable given the projected harbor traffic increases. We would like to take this opportunity to make a few suggestions and point out a few deficiencies.

Mr. Soma
Page 2
April 23, 2001

Dredging and Blasting

Dredging and possibly blasting will be required to make the depth of the harbor a uniform 35 feet. On page 2-26 of the EIS it is stated that dredge spoil will be dumped at the EPA approved ocean dump for Hilo Harbor. How much material will be dredged from Hilo Harbor? How much material will be dredged from Kawaihae Harbor? How much material can be stored at the existing dredge material holding area for Kawaihae Harbor?

If blasting is necessary at Kawaihae Harbor how much will take place? When will it take place? On page 3-6 of the EIS the impacts of construction activities on the fill soils in the project areas are discussed. Does this discussion include the potential impacts from blasting which may occur at Kawaihae Harbor?

Affected Environment-Proposed Mitigation Measures

On page 3-8 we are told that "The NPDDES Permitting process will require the submission of a Best Management Practices Plan which will address methods of runoff, erosion, and sediment control at the project sites". What are best management practices (BMPs) with respect to runoff, erosion, and sediment control? The key is to get as much of the runoff as possible to percolate into the ground rather than going straight down the storm drain and into the harbor.

Related to the runoff issue is the proposed expansion of the roadways that provide access to the harbor. Runoff from roadways can be a significant cause of water pollution, particularly if the parties responsible for maintenance of the roadway insist on applying Roundup to all vegetation within several feet of the side of the road. The result is barren soil that washes away with every rain. There is no mention of this problem in the EIS.

Overseas Container Terminal

The discussion of the overseas container terminal (pages 3-21 to 3-23) mentions "The forest here is from 50 to 80 feet tall". We infer that trees 50 to 80 feet tall are going to be cut down to make way for the container terminal. Assuming this to be the case, the statement (p. 3-23) "No adverse impact is expected" is a bit off target. If these trees will be cut down, we suggest that native trees be planted in the vicinity as mitigation to replace those that will be cut down.

Existing Conditions

In Table 9 (p. 3-24) the number of species adds up to 51, not 76. The arithmetic is correct in Table 10 (p. 3-27). On page 3-24 mention is made of "76 organisms". Are we talking about 76 organisms or 76 species?

Solid Waste

The status of the Hilo landfill is troublesome (p. 3-41). The landfill is unlined and out of compliance with EPA regulations. On page 3-41 we are told that the County of Hawaii has applied for annual extensions for the landfill to remain open. On page 3-42 we are told that closure of the landfill "appears imminent". The draft EIS envisions the solid waste being hauled 90 miles by truck to the West Hawaii Landfill (p. 3-42). The EIS should make it clear that putting the solid waste in the Hilo landfill is unacceptable and that the waste must go to the West Hawaii landfill until an EPA approved landfill becomes available closer to Hilo.

We commend the Harbors Division for the environmentally responsible plans on page 3-44 which mention that the "Division will actively encourage recycling efforts by interisland cruise ships". We would like to know how will this plan be carried out? Will the Harbors Division draft rules requiring recycling on-board vessels or will this recycling effort be voluntary?

Fire Protection

On page 3-47, we are told that there is no fire hydrant within the Hilo harbor property and that the spacing of fire hydrants is inadequate at Kawaihau. On page 3-48 we are told that "All of the existing utilities and public services are expected to be sufficient". It seems to us that if there is no fire hydrant within the Hilo harbor property and the spacing of fire hydrants is inadequate at Kawaihau, the conclusion that all of the existing utilities and public services will be sufficient is in accurate. On page 3-49, we are told that the Harbors Division will "evaluate the requirement for fire hydrants to be closer together than currently provided and take appropriate action". What is there to evaluate? If the fire hydrants are too far apart, then more fire hydrants are needed. More fire hydrants during construction and building expansion of the harbor facilities seems appropriate.

Water Quality

On page 3-63, a background water quality analysis of each harbor is recommended. "Throughout the construction period, daily monitoring should continue to measure any degradation". Water quality is not constant from day to day. The background water quality study should include data collected under a variety of conditions.

At Kawaihau data should be collected on both calm and windy days. At Hilo Harbor data should be collected during both fair weather and rainy weather. Without having some sense of the range of water quality in the harbors under present conditions, it will be difficult to judge whether the construction activities are having any impact.

The water quality data reported in Appendix E are from 9/17/99, 9/29/99, and 3/26/91 in the case of Kawaihau Harbor and 9/24/00 in the case of Hilo Harbor. Some data for Hilo Harbor are also reported from studies reported in 1977 and 1980. It is unclear what measures of water quality will be made on a daily basis during construction. We suggest that the same measurements be made over a period of time on a daily basis prior to construction. In other words, do not compare measurements made on a daily basis during construction with measurements made only a few times prior to construction.

Submerged Cultural Resources

Regarding section 4-3 of the EIS, it would appear that the planners are relying on past terrestrial archaeological surveys and a evaluation of records on file with the State's Preservation Division. Neither meet the legal requirements for submerged cultural resources survey. A dive by a biologist does not constitute appropriate survey methods for submerged cultural resources

Shipwrecks noted as being lost in Hilo bay:

Pao	schooner	1881
Katy Lee	schooner	1871
Maria	schooner	1869
Kilanea Hoi	steamship	1900
Lanakila	sampan	1949
Kodi Manu	sampan	1916
Selina	schooner	1887
Klikitat	bark	1912
Martha Davis	bark	1905

Shipwrecks noted as being lost near Kawaihau:
Liliu schooner 1880

A couple of these wrecks have been located, the rest have not. Almost all of them are historic submerged cultural resources, property of the state of Hawaii, and eligible for nomination to the National Register for Historic Places. They are the physical remains of Hawaii's maritime history. Their management falls under the federal guidelines of the 1987 Abandoned Shipwreck Act. The State's Historic Preservation Division should be well aware of this act, as it dictates the proper protective measures necessary for the intelligent assessment of the State's own submerged cultural resources.

According to the National Historic Preservation Act as amended in 1992, section 106, any project using federal assistance must take into account the possibility of inclusion of objects eligible for the National Register. For submerged cultural resources, this means appropriate survey measures must be undertaken whether or not there is indication of significant remains. A survey is done to determine extant remains, not in response to remains.

Mr. Soma
Page 5
April 23, 2001

Hawaii is may not be in compliance with federal law when it comes to submerged cultural resources. Going through IHPD files does not serve as appropriate survey for submerged cultural resources. Having a biologist report a pile of rocks page (4-11) and an archaeologist dive on them does not constitute an accurate survey of underwater areas.

The industry standard for section 106 surveys involves using both magnetometer remote sensing equipment to detect magnetic anomalies and side scan sonar for detecting artificial protrusions above the seafloor. These tools are readily available to many companies, as are archaeologists trained in conducting surveys for submerged cultural resources. For these relatively small project areas, should be easy.

The project as planned, without appropriate survey, might have a negative impact on significant submerged cultural resources.

Conclusion

The Hawaii Commercial Harbors 2020 Master Plan is shown to be necessary plan to responsibly manage and accommodate the increased boat traffic in the area. We would like to encourage the planners to seriously consider a complete maritime archaeological survey of the area, as well as conduct up to data water quality analysis. Solid waste is an issue that should be examined more closely. It is important that the planners are prepared to responsibly handle the increased waste coming into the harbors in an environmentally sound manner.

We thank you for the opportunity to review this Draft Environmental Impact Statement.

Sincerely,


Peter Rapp
Environmental Review Coordinator

cc: OEQC
James Moncur, WRRRC
Chester Koga, R.M. Towill
Rence Thompson

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May 31, 2001

Mr. Peter Rappa
Environmental Review Coordinator
University of Hawaii Environmental Center
2500 Dole Street, Krauss Annex 19
Honolulu, Hawaii 96822

Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement

Dear Mr. Rappa:

Thank you for your letter of April 23, 2001 which was received by the Department of Transportation, Harbors Division in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS).

Our responses follow the headings presented in your letter.

Dredging and Blasting

Dredging. For each harbor, the area to be dredged by Harbors Division will extend to the current Federal Project Line (existing dredging limits). For Hilo Harbor, preliminary calculations of the volume of dredged material indicate a range of 600,000 to 700,000 cubic yards to dredge the area from Pier 3 to the berth area of Pier 6 and to the existing Federal Project Line. For Kawaihae Harbor, the estimated volume of dredged material would be between 60,000 and 70,000 cubic yards to dredge an additional 5 feet from 35 to 40 feet along Piers 1, 2a and 2b and to 40 feet along the coral stockpile shoreline to the existing Federal Project Line. At Kawaihae the dredged material will be stored on-site at the commercial harbor in the area designated "Cargo Expansion Area." The dredging spoils from previous harbor dredging are in demand by agricultural interests for use in high-calcium soils and for use as a cover fill in sanitary landfills.

Blasting. With regard to concerns about underwater blasting, Harbors Division will explore the feasibility of using other technologies as an alternative to blasting, such as the use of cuttersheads, drag line operations or roadcutters, to dredge designated areas. Other alternatives to blasting, such as technology using pre-drilling and expansion gels to split rock, will also be considered.

Mr. Peter Rappa
May 31, 2001
Page Two

Affected Environment - Proposed Mitigation Measures

Your comment refers to Best Management Practices. Harbors Division will comply with guidelines set forth in Section 9 of Hawaii Administrative Rules, Chapter 11-55, Appendix C, which lists construction management techniques, vegetation controls and structural controls.

Overseas Container Terminal

Your comment pertains to non-native trees "50 to 80 feet tall." You are correct that existing non-native trees will be cut down for construction of the overseas container terminal. The trees are part of an area with introduced plants.

Existing Conditions

With regard to your question about species versus organisms, in the FEIS the text in Appendix E, Review of Water Quality and Biology in Kawaihae and Hilo Harbors for the Harbors 2020 Master Plan Implementation EIS, by AECOS, Inc., will be revised as follows: "A total of only 63 species were recorded on the surveys (Table 2) composed of 9 macroalgae, 29 invertebrates, 24 species of fish, and the green sea turtle." In addition, Tables 9 and 10 will be annotated in Appendix E of the FEIS.

Solid Waste

In response to your comments about solid waste, the DEIS states that the Hilo landfill is unacceptable and waste must go to the West Hawaii landfill. On page 3-42 the DEIS states, "The most likely scenario for handling Hilo's solid waste is to use a central processing station, in which solid waste is sorted then transferred by truck to the West Hawaii landfill."

With regard to recycling by cruise ships, Harbors Division envisions an informal voluntary program which could eventually become more structured with formal rules in cooperation with the State Department of Health which is responsible for regulating solid waste disposal. According to the Hilo Harbormaster, domestic cruise ships are already recycling solid waste by separating cardboard, glass and cans. Harbors Division will continue to encourage such efforts on an informal basis.

Fire Protection

With regard to your concern about fire hydrants at the two harbors, The FEIS will contain the statement: "Harbors Division will ensure that adequate hydrants are provided for the safety of existing and proposed development."

Water Quality

With regard to your comments about water quality monitoring, AECOS, Inc., the firm responsible for water quality information in the FEIS, has offered the following information: Water quality monitoring is anticipated to be included as a requirement in the permits/certifications obtained for construction in the marine environment as required under the Clean Water Act. Monitoring requirements, overseen by the State of Hawaii,

Department of Health (HDOH), would include preconstruction monitoring, and you are correct that such monitoring should extend over a period of time that yields meaningful results rather than compressed into a week before construction starts.

The actual parameters to be measured by the monitoring process are stated in the water quality regulations and guidance documents of the HDOH. Additional parameters could be included if special circumstances warrant looking at these. The frequency of collection of measurements (i.e., daily, weekly) is usually established by the monitoring program documents, and might include some daily measurements during construction.

We anticipate that there will be unavoidable, short-term impacts on water quality caused by construction. These impacts will be limited in both space and time by Best Management Practices (BMPs) established for that purpose. The goal of during-construction water quality sampling is to monitor and document that BMPs are or are not working. If they are not working, new, different, or modified BMPs must be implemented quickly. During-construction monitoring includes control samples that provide background or baseline in the harbor at the time the construction-site samples are collected, and WQ impacts are assessed against these control samples, not the preconstruction samples.

Submerged Cultural Resources

With regard to the possibility of submerged cultural resources in the subject harbors, Harbors Division does not plan to conduct further study based on the following. First, the U.S. Army Corps of Engineers has indicated that previous dredging leaves almost no probability that any previously-dredged area could contain submerged cultural resources. A study of dredging limit maps reveals the only area slated for development that has not been previously dredged extends from Pier 3 to proposed Piers 4, 5 and 6 at Hilo Harbor and to the Federal Project Line. All of the area planned for development in Kawaihae Harbor has been previously dredged.

Second, Hilo and Kawaihae Harbormaster Ian Birnie conducted research of shipwrecks listed in your letter in the Hilo and Kawaihae areas using the following references: Gibbs, Jim, 1977. Shipwrecks in Paradise; Rodgers, Richard W., 1999. Shipwrecks in Hawaii; Thomas, Mifflin, 1982. Hawaiian Interisland Vessels and Hawaiian Registered Vessels; and Thomas, Mifflin, 1983. Schooner from Windward.

Mr. Birnie offers the following details which conclude that the shipwrecks do not coincide with the subject project areas:

- "PATO was a 45' wooden schooner that sank at Papaikou 25 November 1881. Papaikou is 4-5 miles north of Hilo Harbor and does not appear on the associated National Oceanic and Atmospheric Administration (NOAA) chart #19324 of Hilo Bay.
- KATE (vice KATY) LEE was a wooden schooner wrecked at Onomea Bay 2 November 1871. Onomea is 8-9 miles north of Hilo and does not appear on the NOAA chart for Hilo Bay.
- MARIA was an 84-foot wooden schooner "...reduced to a jumble of curved wood..." at Onomea landing in early 1869. See previous remarks re Onomea.
- KILAUEA HOU was a 119-foot wooden hulled steamships that was "driven ashore at Hilo" on 27 December 1900. She was abandoned after bursting seams, and was "lying in the sand on the beach" for at least three to four years. If still on the beach, she would be well out of the Federal Project Line for Hilo Harbor, at least a mile away.
- LANAKILA was a 38- or 40-foot wooden sloop that "dashed off the cliffs of Wainaku" 28 December 1949. The crew was asleep. Wainaku Point is 2-3 miles from Hilo Harbor, on the opposite side of Hilo Bay.
- KOOKI (vice KOKI) MARU was a wooden sampan that hit the Hilo Breakwater 24 June 1936. It reportedly only had a five-horsepower engine. It was unknown whether she hit the breakwater from the inside or outside.

Mr. Peter Rappa
May 31, 2001
Page Five

- SELINA was either a schooner or brig, also wood, that "wrecked on entering Hilo Harbor" 11 February 1887. She went aground at Puukaa, "500 yards from Wainaku Mill." See previous comments re Wainaku. ("Wainaku Mill is Hilo Sugar Company Mill, at Wainaku.")
- KLIKITAT was a wooden barkentine (vice bark) that went aground against the cliff at Papaikou "near Honolili" in November 1912. She broke up. The area is at least 3 miles from Hilo Harbor.
- MARTHA DAVIS was a 163-foot wooden bark (misidentified by Rodgers as a brig) that burned while "at anchor in the stream" in Hilo Bay 13 May 1905. The "streams" in Hilo Bay are the Wailuku River and the Wailoa River, both of which are some distance from today's harbor.
- LILIU was a small wooden schooner that "went ashore at Kawaihae" 22 December 1880 and was declared a total wreck. It is unlikely that any remains are in the current harbor, which is south of the former pier. The U.S. Army Corps of Engineers dredged inside the breakwater to create the harbor we know today.

If you have any questions please call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga
Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

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June 29, 2001

Mr. Peter Rappa
Environmental Review Coordinator
University of Hawaii Environmental Center
2500 Dole Street, Krauss Annex 19
Honolulu, Hawaii 96822

**Hawaii Commercial Harbors 2020 Master Plan
Draft Environmental Impact Statement**

Dear Mr. Rappa:

Thank you for your letter of April 23, 2001 which was received by the Department of Transportation, Harbors Division in which you provided comments on the above-referenced Draft Environmental Impact Statement (DEIS). We responded to your letter on May 31, 2001. The purpose of this letter is to provide additional information on several points.

Affected Environment -- Proposed Mitigation Measures

Your comment refers to Best Management Practices for runoff, sediment and erosion control. Harbors Division will comply with guidelines set forth in Section 9 of Hawaii Administrative Rules, Chapter 11-55, Appendix C. Specific control measures for included in the above-cited section for runoff, sediment and erosion control include:

Site-specific Best Management Practices (BMPs) will be left up to the project contractor based on the contractor's professional experience and conditions at the site. These are the inspection and maintenance practices that will be used to maintain erosion and sediment controls: All control measures will be inspected at least once each week and following any rainfall event of 0.5 inches or greater. All measures will be maintained in good working order. If a repair is necessary, it will be initiated within 24 hours after the inspection.

- Built-up sediment will be removed from sill fences when it has reached one-third the height of the fence.
- Silt fences will be inspected for depth of sediment, tears, to see if the fabric is securely attached to the fence posts, and to see that the fence posts are firmly in the ground.
- Sediment basins will be inspected for depth of sediment, and built-up sediment will be removed when it reaches 10 percent of the design capacity and at the end of the job.

Mr. Peter Rappa
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- Diversion dikes will be inspected and any breaches promptly repaired.
- Temporary and permanent seeding and planting will be inspected for bare spots, washouts, and healthy growth.
- A maintenance inspection report will be made promptly after each inspection by the contractor and submitted to the Department of Transportation, Harbors Division (DOT-HAR).
- The contractor will select a minimum of three personnel who will be responsible for inspections, maintenance and repair activities, and filling out the inspection and maintenance report, and submittal to DOT-HAR.

Personnel selected for the inspection and maintenance responsibilities will receive training from the contractor. They will be trained in all the inspection and practices necessary for keeping the erosion and sediment controls used onsite in good working order.

Overseas Container Terminal

Your comment pertains to non-native trees "50 to 80 feet tall." You are correct that existing non-native trees will be cut down for construction of the overseas container terminal. The trees are part of an area with introduced plants. Unfortunately, cargo projections indicate the requirement for all available space and expansion into Bakers Beach lots. There will not be sufficient space for replanting.

Existing Conditions

Tables 5 and 10 (vice 9 and 10 as stated in our letter of May 31, 2001) will be annotated in Appendix E of the FEIS with regard to introduced, native and endemic species.

If you have any questions please call me at 842-1133 or Glenn Soma, Harbors Planner, at 587-2503.

Very truly yours,

Chester T. Koga
Chester T. Koga, AICP
Project Manager

Cc: Department of Transportation, Harbors Division

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June 29, 2001

Dear Petitioner:

Earlier this year you signed a petition regarding development of Kawaihae Harbor. We acknowledge your interest in this project on behalf of the State of Hawaii, Department of Transportation, Harbors Division.

This letter provides information on three aspects of the plan mentioned in the petition: the proposed liquid bulk terminal at the harbor, public access for recreation, and the cultural significance of the area.

- The proposed liquid bulk terminal at the harbor will enable shipment of petroleum and jet fuel directly to Kawaihae. Currently this fuel must be transported by truck across the island from Hilo and stored at Kawaihae. The new terminal will be constructed according to strict State and Federal standards for safety and environmental protection.
- Harbors Division plans to continue its practice of allowing public access for recreational purposes, with public safety remaining a prime consideration.
- The cultural significance of the Puukohola Heiau National Historic Site is acknowledged by maintaining a buffer zone between harbor development and the heiau. This buffer is preserved through a formal agreement between the State of Hawaii and the U.S. Department of the Interior, National Parks Service, which manages the heiau.

An Environmental Impact Statement detailing the harbor plans is available at the Kailua-Kona Public Library, Hilo Public Library and Bond Memorial Library.

Thank you for your interest.

Sincerely,

Chester T. Koga

Chester T. Koga, AICP
Project Manager

The letter shown opposite was mailed to all people who signed the petitions published in this document. Their names are listed in the beginning of Appendix 1-B.