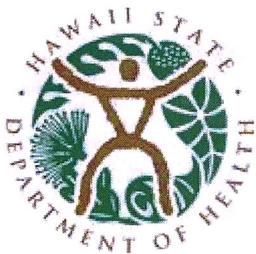


Domian, Jesse

From: Narimatsu, Noella <Noella.Narimatsu@doh.hawaii.gov>
Sent: Thursday, April 20, 2017 4:59 PM
To: Planning Internet Mail; Gloor, Leana
Cc: DOH.EPO; McIntyre, Laura
Subject: EPO 17-075: Hamakua Community Development
Attachments: 17-075 Hamakua Community Dev Plan Response.pdf

On behalf of Laura McIntyre, here are comments from the Environmental Planning Office.
Noella

Noella Narimatsu
Secretary, Environmental Planning Office
Hawaii State Department of Health
919 Ala Moana Blvd., Rm. 312
Honolulu, Hawaii 96814
Phone: (808) 586-4337
Email: noella.narimatsu@doh.hawaii.gov
Website: <http://health.hawaii.gov/epo>



2017 APR 21 PM 12 31
PLANNING DEPARTMENT
COUNTY OF HAWAII



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

In reply, please refer to:
File:

EPO 17-075

April 20, 2017

Ms. LeAna Gloor, Project Manager
County of Hawaii Planning Department
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720
Email: planning@hawaiicounty.gov
Leana.Gloor@hawaiicounty.gov

Dear Ms. Gloor:

SUBJECT: Hamakua Community Development Plan Review

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your plan to our office via our District Health Office, Hawaii Island and the Hamakua CDP web link:

<http://records.co.hawaii.hi.us/WebLink/PDF/13ntcmwnkhw5nnqge2bcqtuf/147/Recommended%20Hāmākua%20CDP.pdf>

We understand from your Memorandum dated March 15, 2017 that our DHO Hawaii Island received that, "The General Plan is the County of Hawaii's policy document for the long range comprehensive development of the County. Chapter 15 of the General Plan (2005 edition, as amended) establishes the County's CDP program to create a framework for regional planning that provides residents and other stakeholders the opportunity to actively participate in planning for their communities.

The Hamakua CDP planning area includes the Judicial Districts of Hamakua and North Hilo, and parts of South Hilo, with the southern planning area edge bordering Kaiwiki and Hau Street. The planning area includes the towns of Kukuihaele, Honoka'a, Pa'auilo, 'O'okala, Laupahoehoe, Papa'aloa, Ninole, Hakalau/Wailea, Honomil, Pepe'ekeo, Papa'ikou, and Pauka'a, and all of the agricultural and conservation lands in between. In late 2016, the Steering Committee for the Hamakua Community Development Plan (CDP) formally recommended the Hamakua CDP for adoption. Following agency review, the CDP will go to the Windward Planning Commission for review and recommendations. The County Council will then consider the CDP for adoption by ordinance.

Importantly, the Hamakua CDP is the community's plan, with guidance and direction provided by the CDP Steering Committee. The Steering Committee is a volunteer advisory board composed of a diverse, representative mix of community members. Now that the Steering Committee has recommended approval, the County can consider the CDP for adoption. Since CDP's are adopted by ordinance, we must ensure that they are consistent with existing statutes, codes, and plans. Agency review is therefore critical."

In the development and implementation of all Community Development Plans, EPO suggests review of DOH Strategic Planning. A copy of the DOH Strategic Plan (2015-2018) is available at: <http://health.hawaii.gov/opppd>. The Environmental Health has strategic Plans to help achieve the Governors Environmental Plan (2015-2019) see: <http://governor.hawaii.gov/action-plan/environment>. A brief summary of environmental health activities in line with the State Environmental initiatives are provided at: <http://health.hawaii.gov/epo/strategic>

Ms. LeAna Gloor, Project Manager
Page 2
April 20, 2017

For all projects, EPO strongly recommends regular review of State and Federal environmental health land use guidance. State standard comments and available strategies to support sustainable and healthy design are provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. EPO has recently updated the environmental Geographic Information System (GIS) website page. It now compiles various maps and viewers from our environmental health programs. The eGIS website page is continually updated so please visit it regularly at: <http://health.hawaii.gov/epo/egis>.

In 2015, Hawaii passed Act 97 which amended Hawaii's Renewable Portfolio Standards by setting a goal for Hawaii to become one hundred percent renewable by the year 2045. To reach this goal Hawaii should transform its transportation sector from the use of fossil fuels to renewable fuel, electric vehicles (EV)s, and bicycles. To address "range anxiety" and facilitate the adoption of EVs, it is essential that EV charging stations be added to any planned parking areas open to the EV driving public. All efforts should be made to reduce harmful vehicle emissions, reduce vehicle miles travelled (VMT's), encourage alternative modes of transport and increase physical activity.

EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal at: <https://eha-cloud.doh.hawaii.gov>. This site provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings.

We note your mention of the DOH, Clean Water Branch (CWB) on page 64, under *Kokua Action 14: Complete a comprehensive water quality monitoring program for the Planning Area's coastal waters*. DOH CWB would like to assist in this action. *Kokua Action 15: Prioritize developing Total Maximum Daily Loads (TMDLs) for Impaired Steams. (Clean Water Act – 303d)*. Our CWB monitoring section would like to assist in this action as well.

We suggest you review the requirements of the CWB (Hawaii Administrative Rules (HAR), Chapter 11-54-1.1, -3, 4-8) and/or the National Pollutant Discharge Elimination System (NPDES) permit (HAR, Chapter 11-55) at: <http://health.hawaii.gov/cwb>. If you have any questions, please contact the Clean Water Branch (CWB), Engineering Section at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov. If your project involves waters of the U.S., it is highly recommended that you contact the Army Corps of Engineers, Regulatory Branch at: (808) 835-4303.

We note your initiative to (Section 5.7, page 80) improve Water and Wastewater Infrastructure to prioritize the improvement of existing potable water and wastewater systems to support infill growth. Our DOH Safe Drinking Water Branch (SDWB) and Wastewater Branch (WWB) would like to assist you in this objective. Please note that all wastewater plans must conform to applicable provisions (HAR, Chapter 11-62, "Wastewater Systems"). We reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please review online guidance at: <http://health.hawaii.gov/wastewater> and contact the Planning and Design Section of the Wastewater Branch (WWB) at (808) 586-4294.

We are encouraged by the fact that your plan mentions renewable energy and sustainability. For questions in regards to reducing harmful air emissions and monitoring, including mapping, existing emissions please contact the Clean Air Branch via e-mail at: Cab.General@doh.hawaii.gov or call (808) 586-4200.

A phase I Environmental Site Assessment (ESA) and site investigation should be conducted for residential development or redevelopment projects in current or formerly used industrial areas and on formerly and currently zoned agricultural land used for growing sugar, pineapple or other agricultural products. If the investigation shows

Ms. LeAna Gloor, Project Manager

Page 3

April 20, 2017

that a release of petroleum, hazardous substance, pollutants or contaminants may have occurred at the site, the site should be properly characterized through an approved Hawaii State Department of Health (DOH)/Hazard Evaluation and Emergency Response Office (HEER) soil and/or groundwater sampling plan. Please refer to Sections 3 and 4 of the HEER Office Technical Guidance Manual <http://www.hawaiidoh.org>.

If the site is found to be contaminated, then all removal and remedial actions to clean up hazardous substance or oil releases by past and present owners/tenants must comply with State Law (HRS, Chapter 128D, "Environmental Response Law", Chapter 451, "State Contingency Plan"). To identify HEER records related to the property, visit <http://eha-web.doh.hawaii.gov/eha-cma/Leaders/HEER/public-records>. For information on site assessment and cleanup programs review: <http://eha-web.doh.hawaii.gov/eha-cma/Leaders/HEER/site-assessment-and-cleanup-programs>. Any specific questions should be directed to the HEER office at (808) 586-4249.

For any matters regarding safe food handling education and increasing transparency on policy and education regarding DOH rules on food production and service (Kokua Action 68 - page 94) please review the updated Sanitation Branch website: <http://health.hawaii.gov/san>, contact the DHO Hawaii or our Honolulu based Sanitation Branch.

You may also wish to review the draft Office of Environmental Quality Control (OEQC) viewer at: <http://eha-web.doh.hawaii.gov/oeqc-viewer>. This viewer geographically shows where some previous Hawaii Environmental Policy Act (HEPA) {Hawaii Revised Statutes, Chapter 343} documents have been prepared.

To better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at: <http://www.epa.gov/ejscreen>. For older structures, containing lead paint and or asbestos that need to be removed please review the information on our Indoor Radiological Health Branch website: <http://health.hawaii.gov/irhb> contact the DHO Hawaii or our Indoor, Radiological Health Branch in Honolulu.

For information on hazard evaluation and emergency response activities please see our HEER Office website at: <http://eha-web.doh.hawaii.gov/eha-cma/Org/HEER>

For information on our various DOH supported recycling programs and solid and hazardous waste management please see our website: <http://health.hawaii.gov/shwb>

Hawaii's climate is changing. Sea level rise and the associated coastal impacts have the potential to harm an array of natural and built environments in Hawaii. For additional information on projected sea level rise in Hawaii, EPO recommends that you visit the following informative links:

- State of Hawaii Climate Adaptation Portal: <http://climateadaptation.hawaii.gov>
- University of Hawaii, Manoa, School of Ocean and Earth Sciences and Technology, Coastal Geology Group: <http://www.soest.hawaii.edu/coasts/index.html>
- US Environmental Protection Agency – Climate Impacts on Coastal Areas: <https://www.epa.gov/climate-impacts/climate-impacts-coastal-areas>

Ms. LeAna Gloor, Project Manager
Page 4
April 20, 2017

We request that you utilize all this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design. Thank you for the opportunity to comment.

Mahalo nui loa,



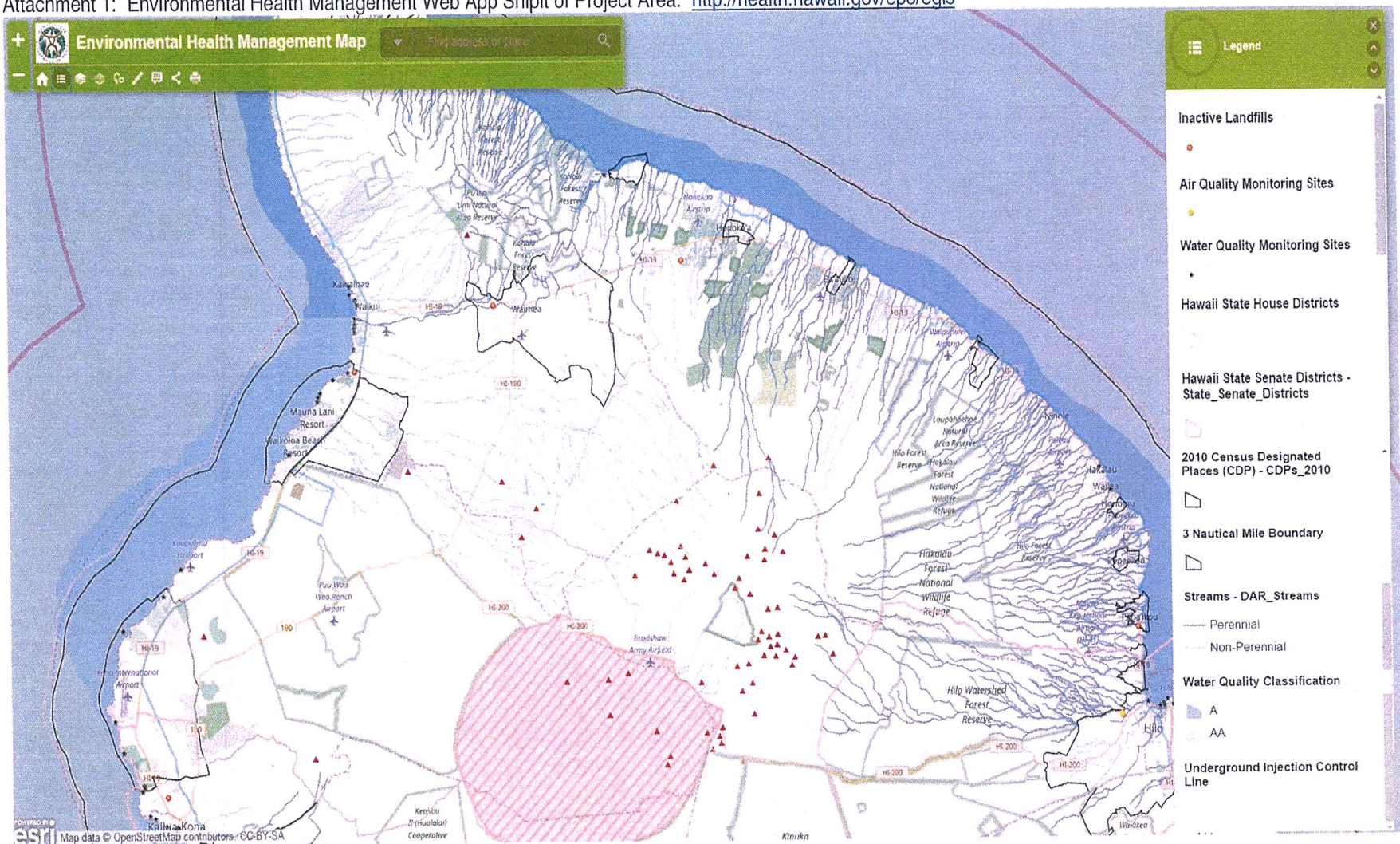
Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

LM:nn

Attachment 1: Environmental Health Management Web App Snipit of Project Area: <http://health.hawaii.gov/epo/egis>
Attachment 2: Clean Water Branch: Water Quality Standards Map - Hawaii
Attachment 3: Wastewater Branch: Act 120 Cesspool Tax Credit Web App Snipit of Project Area
Attachment 4: Historic Sugarcane Map of Project Area
Attachment 5: OEQC viewer (of past EA's, EIS's in area)
Attachment 6: U.S. EPA EJSCREEN Report for Project Area

c: DOH: DDEH, DHO HI, EMD, CWB, SDWB, WWB, CAB, SHWB, EHSD, SAN, IRHB, Vector {via email only}

Attachment 1: Environmental Health Management Web App Snipit of Project Area: <http://health.hawaii.gov/epo/egis>



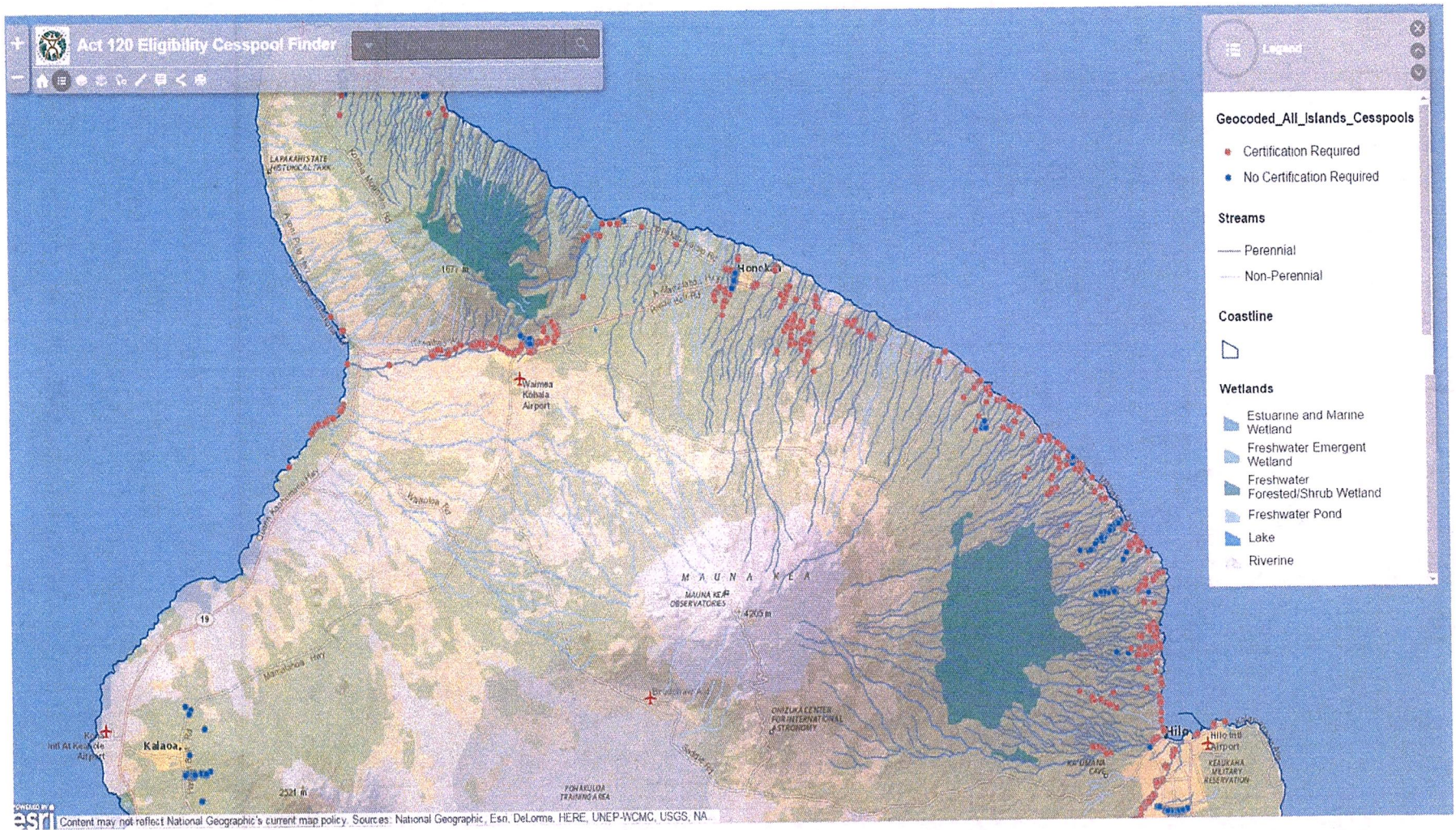
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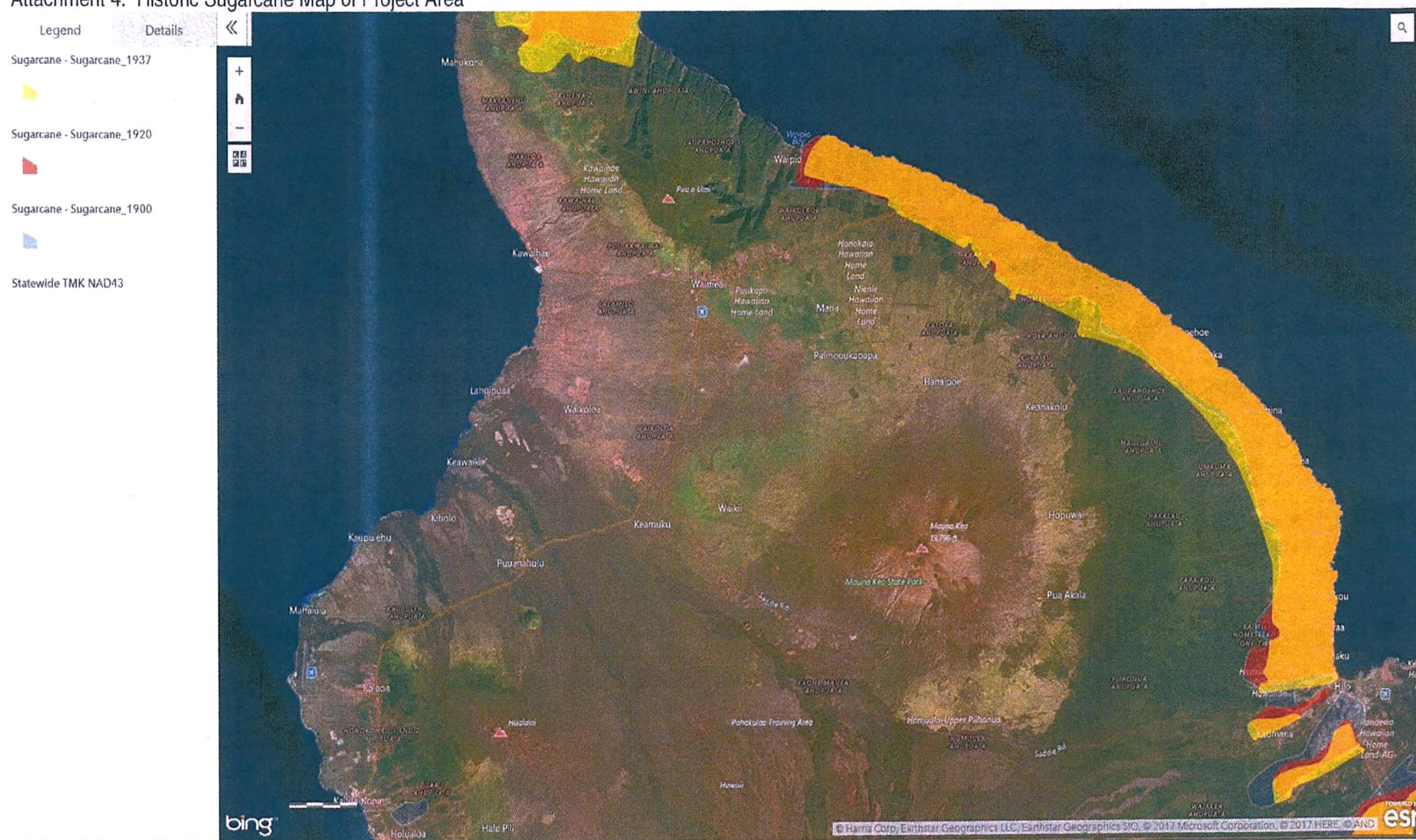
June 2014

This map is a geographic representation of Hawaii State Water Quality Standards as set forth in Hawaii Administrative Rules Chapter 11-54, but is intended for reference only, not to substitute for the governing language in the Water Quality Standards.

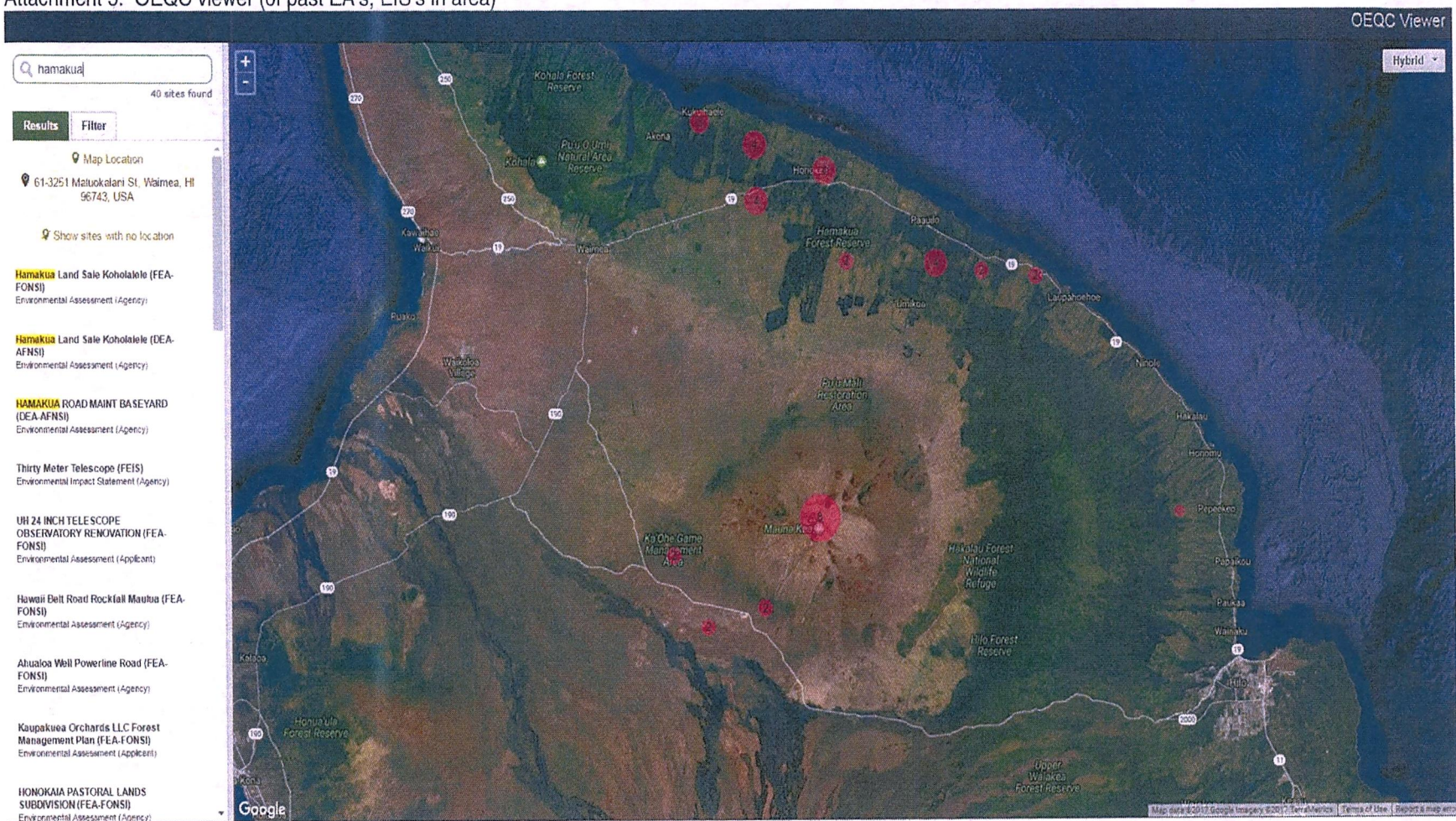
Attachment 3: Wastewater Branch: Act 120 Cesspool Tax Credit Web App Snipit of Project Area



Attachment 4: Historic Sugarcane Map of Project Area



Attachment 5: OEQC viewer (of past EA's, EIS's in area)



Attachment 6: U.S. EPA EJSCREEN Report for Project Area



EJSCREEN Report (Version 2016)

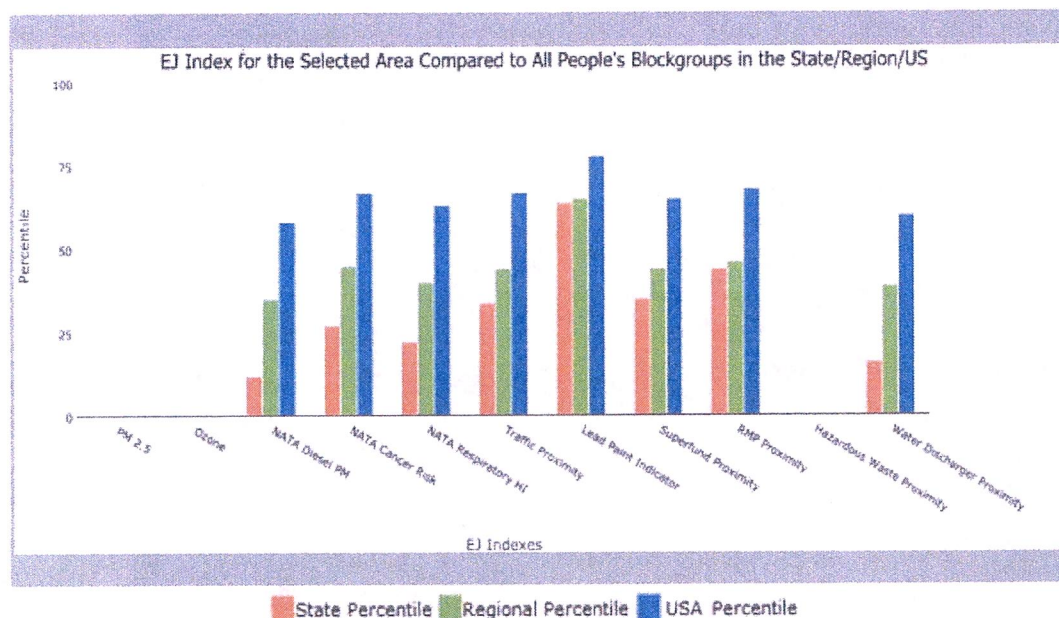


1 mile Ring Centered at 19.997929,-155.289808, HAWAII, EPA Region 9

Approximate Population: 5

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA* Diesel PM	12	35	58
EJ Index for NATA* Air Toxics Cancer Risk	27	45	67
EJ Index for NATA* Respiratory Hazard Index	22	40	63
EJ Index for Traffic Proximity and Volume	34	44	67
EJ Index for Lead Paint Indicator	64	65	78
EJ Index for Superfund Proximity	35	44	65
EJ Index for RMP Proximity	44	46	68
EJ Index for Hazardous Waste Proximity*	N/A	N/A	N/A
EJ Index for Water Discharger Proximity	16	39	60

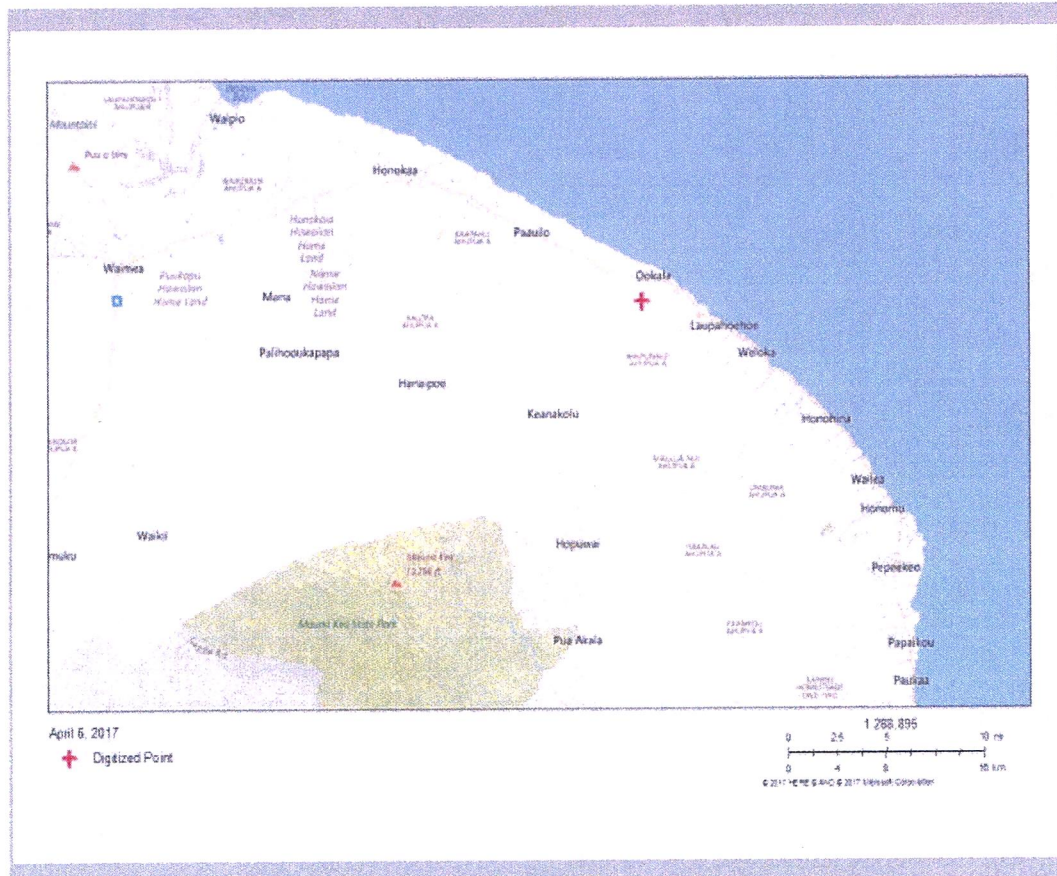


This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 19.997929,-155.289808, HAWAII, EPA Region 9

Approximate Population: 5

Input Area (sq. miles): 3.14



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0
National Pollutant Discharge Elimination System (NPDES)	0

1 mile Ring Centered at 19.997929,-155.289808, HAWAII, EPA Region 9

Approximate Population: 5

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.37	N/A	9.32	N/A
Ozone (ppb)	N/A	N/A	N/A	51	N/A	47.4	N/A
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.0048	0.149	1	0.978	<50th	0.937	<50th
NATA* Cancer Risk (lifetime risk per million)	24	34	0	43	<50th	40	<50th
NATA* Respiratory Hazard Index	0.47	1	0	2	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	28	990	31	1100	22	590	31
Lead Paint Indicator (% Pre-1960 Housing)	0.28	0.16	75	0.24	63	0.3	59
Superfund Proximity (site count/km distance)	0	0.098	29	0.15	13	0.13	16
RMP Proximity (facility count/km distance)	0.11	0.19	57	0.57	22	0.43	31
Hazardous Waste Proximity* (facility count/km distance)	N/A	0.14	N/A	0.14	N/A	0.11	N/A
Water Discharger Proximity (facility count/km distance)	0.01	0.34	6	0.2	3	0.31	1
Demographic Indicators							
Demographic Index	47%	52%	35	47%	52	36%	71
Minority Population	58%	77%	17	58%	49	37%	73
Low Income Population	36%	26%	73	36%	54	35%	57
Linguistically Isolated Population	0%	6%	23	9%	19	5%	44
Population With Less Than High School Education	7%	9%	50	17%	33	14%	37
Population Under 5 years of age	5%	6%	43	7%	40	6%	44
Population over 64 years of age	12%	15%	34	13%	56	14%	46

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

+ The hazardous waste environmental indicator and the corresponding EJ index will appear as N/A if there are no hazardous waste facilities within 50 km of a selected location.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.