Appendix A-4

Draft EIS Comments and Responses

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United States Department of the Interior

F001

U.S. GEOLOGICAL SURVEY
Pacific Islands Water Science Center
1845 Wasp Boulevard, Building 176
Honolulu, Hawaii 96818

Phone: (808) 690-9600/Fax: (808) 690-9599

May 4, 2015

Mr. Brian E. Peck
Chief, Military Planning and Environmental Compliance Branch
Department of the Army
U.S. Army Engineer District, Mobile District
Corps of Engineers
P.O. Box 2288
Mobile, Alabama 36628-0001

Dear Mr. Peck:

Subject: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii

Thank you for forwarding the subject DEIS for review and comment by the staff of the U.S. Geological Survey Pacific Islands Water Science Center. We regret however, that due to prior commitments and lack of available staff, we are unable to review this document.

We appreciate the opportunity to participate in the review process.

Sincerely,

Stephen S. Anthony
Center Director

August 6, 2015

Mr. Stephen S. Anthony
Center Director
Pacific Islands Water Science Center
U.S. Geological Survey
United States Department of the Interior
1845 Wasp Boulevard, Building 176
Honolulu, HI 96818

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Anthony:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number F001 and will be included, along with this response letter, in appendix A of the final EIS.

We understand that your staff was unavailable to review the SGSP draft EIS due to other commitments, and we appreciate your taking the time to provide a comment letter. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources

Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, U.S. ARMY CORPS OF ENGINEERS
FORT SHAFTER, HAWAII 96858-5440

F002

May 18, 2015

SUBJECT: Draft Environmental Impact Statement for the Schofield Generating Station Project in Honolulu, Honolulu County, Island of Oahu, Hawaii; POH-2015-00076

IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, HI 96857

Dear Mr. Graham:

In response to your letter dated April 15, 2015 requesting comments for the Draft Environmental Impact Statement for the Schofield Generating Project, U.S. Army Garrison, Hawaii, the following information is provided for your consideration.

Please be advised, if the proposed project involves work in waters of the U.S., a Department of the Army (DA) authorization may be required. Under Section 10 of the Rivers and Harbors Act, structures and/or work in or affecting the course, location, condition, or capacity of navigable waters of the U.S. require DA authorization. Navigable waters of the U.S. are waters subject to the ebb and flow of the tide. Under Section 404 of the Clean Water Act, DA authorization is required for discharges of dredged or fill material into waters of the U.S., including wetlands. Generally, discharges of fill include materials that change the bottom elevation of a water of the U.S. and include rock, sand, soil, debris, overburden, etc. Waters of the U.S. include navigable waters of the U.S. and other waters including wetlands, rivers, streams, lakes, and ponds.

Based on the information you provided, it appears your proposed project may require work within the Waikele and Kiikii watersheds and within the Waikele Stream and may result in the discharge of fill material into these watersheds and the Waikele Stream. Therefore, in accordance with Section 404 you may need to obtain a DA permit from this office prior to commencing your proposed work. Accordingly, we recommend the continued coordination of the development of this project with our office. For your convenience a permit application is enclosed.

Thank you for your cooperation with the Honolulu District Regulatory Program. Should you have any questions related to this determination, please contact Rebecca Frager of my staff at 808-835-4307 or via e-mail at Rebecca.M.Frager@usace.army.mil. You are encouraged to provide comments on your experience with the Honolulu District Regulatory Office by accessing our web-based customer survey form at http://corpsmapu.usace.army.mil/cm_apex/f?p=136:4:0.

Sincerely,

Michelle Lynch

Michelle Lynch
Chief, Regulatory Office

Andrews, Emmy

From: Frager, Rebecca M POH <Rebecca.M.Frager@usace.army.mil>
Sent: Monday, May 18, 2015 2:33 PM
To: DIV.SGSP Comments
Subject: Comment Letter for Schofield Generating Station POH-2015-00076 (UNCLASSIFIED)
Attachments: comment letter signed.pdf; POH_Permit_Application_mar2015_fillable.pdf

Classification: UNCLASSIFIED
Caveats: NONE

Dear Mr. Graham

Please see the attached letter commenting on the Draft EIS for the proposed Schofield Generating Station Project in Honolulu, Honolulu County, Island of Oahu, Hawaii. We have assigned your project Department of the Army (DA) File Number: POH-2015-00076. Please use this number in all future correspondence regarding this project.

Please also see the attached Permit Application to be used in requesting a DA Permit. If you have any questions or comments or if there are any problems with the attachments, please don't hesitate to call me at: 808-835-4307 or reply to this email at: Rebecca.M.Frager@usace.army.mil.

Thank you for your cooperation with the permitting process.

Becca Frager
Biologist
U.S. Army Corps of Engineers
Honolulu District Regulatory Office
Building 230
Fort Shafter, HI 96858-5440
Phone: 808-835-4307

Classification: UNCLASSIFIED
Caveats: NONE

Department of the Army
Permit Application

Date Received by CEPOH-RO

U.S. Army Corps of Engineers Honolulu District	**Send Completed Application to:** Honolulu District, U.S. Army Corps of Engineers Regulatory Office [CEPOH-RO] Building. 230 Fort Shafter, Hawaii 96858-5440 or email to: CEPOH-RO@usace.army.mil
DA File Number	

(1) APPLICANT AND LANDOWNER CONTACT INFORMATION

	Applicant	Property Owner (if different)	Authorized Agent (if applicable) ☐ Consultant ☐ Contractor
Contact Name Business Name Mailing Address 1 Mailing Address 2 City, State, Zip			
Business Phone Cell Phone Fax Email			

(2) PROJECT INFORMATION

A. Provide the project location.

Project Name	Tax Map Key (TMK):	Latitude and Longitude
Project Address / Location	City (nearest)	County
Brief Directions to the Site		

B. What types of waterbodies or wetlands are present in your project area? (Check all that apply.)

☐ River / Stream	☐ Non-Tidal Wetland	☐ Lake / Reservoir / Pond
☐ Estuary or Tidal Wetland	☐ Other	☐ Pacific Ocean

Waterbody or Wetland Name**	River Mile	Watershed	Island

C. Indicate the project category. (Check all that apply.)

☐ Commercial Development	☐ Industrial Development	☐ Residential Development
☐ Institutional Development	☐ Agricultural	☐ Recreational
☐ Transportation	☐ Restoration	☐ Bank Stabilization
☐ Dredging	☐ Utility lines	☐ Survey or Sampling
☐ In- or Over-Water Structure	☐ Maintenance	☐ Other:

* In decimal format (e.g., 44.9399, -123.0283)
** If there is no official name for the wetland or waterway, create a unique name (such as “Wetland 1” or “Tributary A”).

(3) PROJECT PURPOSE AND NEED

Provide a statement of the purpose and need for the overall project.

(4) DESCRIPTION OF RESOURCES IN PROJECT AREA

A. Describe the existing physical and biological characteristics of each wetland or waterway. Reference the wetland and waters delineation report if one is available. Include the list of items provided in the instructions. Submit the biological survey with the application if one has been completed.

B. Describe the existing navigation, fishing and recreational use of the waterway or wetland.

(5) PROJECT SPECIFIC CRITERIA AND ALTERNATIVES ANALYSIS

Describe project-specific criteria necessary to achieve the project purpose. Describe alternative sites and project designs that were considered to avoid or minimize impacts to the waterway or wetland.

(6) PROJECT DESCRIPTION

A. Briefly summarize the overall project including work in areas both in and outside of waters or wetlands.

B. Describe work within waters and wetlands.

C. Construction Methods including any temporary work required, equipment/materials necessary, staging/access locations, location of stockpiles. Describe best management practices i.e. how the activities will be accomplished while minimizing impacts to waters and/or wetlands.

D. Describe source of fill material and disposal locations if known.

(6) PROJECT DESCRIPTION

E. Construction sequence and timeline.

What is the estimated project start date?

What is the estimated project completion date?

Is any of the work underway or already complete? ☐ Yes ☐ No
If yes, describe.

F. Fill Volumes and Dimensions (if more than 4 impact sites, include a summary table as an attachment)

Wetland / Waterbody Name *	Fill Dimensions					Duration of Impact**	Material***
	Length (ft.)	Width (ft.)	Depth (ft.)	Area (sq.ft. or ac.)	Volume (c.y.)		

G. Total Fill Volumes and Dimensions

Fill Impacts to Waters	Length (ft.)	Area (sq. ft or ac.)	Volume (c.y.)
Total Fill to Wetlands			
Total Fill Below Ordinary High Water			
Total Fill Below High Tide Line			
Total Fill Below Mean High Water Tidal Elevation			

H. Removal Volumes and Dimensions (if more than 4 impact sites, include a summary table as an attachment)

Wetland / Waterbody Name*	Removal Dimensions					Duration of Impact**	Material***
	Length (ft.)	Width (ft.)	Depth (ft.)	Area (sq. ft. or ac.)	Volume (c.y.)		

I. Dredging Volumes and Dimensions

Dredging Impacts to Waters	Length (ft.)	Depth (ft.)	Width (ft.)	Volume (c.y.)
Total Dredging Seaward of Mean High Water Tidal Elevation				

* If there is no official name for the wetland or waterway, create a unique name (such as "Wetland 1" or "Tributary A").
** Indicate the days, months or years the fill or removal will remain. Enter "permanent" if applicable.
*** Example: soil, gravel, wood, concrete, pilings, rock etc.
****If the High Tide Line is not observable in the field, the Mean Higher High Water Elevation may be acceptable.

(7) ADDITIONAL INFORMATION

Are there any federally listed species under the Endangered Species Act on the project site?	☐ Yes	☐ No	☐ Unknown
Is the project site within designated or proposed critical habitat identified under the Endangered Species Act?	☐ Yes	☐ No	☐ Unknown
Is the project site within the 100-year floodplain?	☐ Yes	☐ No	☐ Unknown

*** If yes to listed species or critical habitat, submit a biological assessment with application if one has been prepared or explain in Block 4 and describe measures to minimize adverse effects to these resources in Block 5.**

Is the project site within a State or Federal marine managed area? (i.e. Marine Life Conservation Dist., Wildlife Sanctuary, or Fishery Management Area, etc.)	☐ Yes	☐ No	☐ Unknown
Will the overall project involve construction dewatering or ground disturbance of one acre or more? *** If yes, you may need an NPDES permit.**	☐ Yes	☐ No	☐ Unknown
Is the fill or dredged material a carrier of contaminants from on-site or off- site spills?	☐ Yes	☐ No	☐ Unknown
Has the fill or dredged material been physically and/or chemically tested? ***If yes, explain in Block 4 and provide references to any physical/chemical testing report(s).**	☐ Yes	☐ No	☐ Unknown
Are there known Cultural Resources in the project area? Has coordination with the State Historic Preservation Division occurred (or 6E completed)? *** If yes, provide a copy of any surveys and/or 6E with this application.**	☐ Yes	☐ No	☐ Unknown

Identify any other federal agency that is funding, authorizing or implementing the project.

Agency Name	Contact Name	Phone Number	Most Recent Date of Contact

List other certificates or approvals/denials required or received from other federal, state or local agencies for work described in this application. For example, certain activities that require a Department of Army permit also require 401 Water Quality Certification.

Approving Agency	Certificate/ approval / denial description	Date Applied

Other U.S. Army Corps of Engineers (Corps) Actions associated with this site? (Check all that apply)

☐ Work proposed on or over lands owned by or leased from the Corps

Other Corps Permits Corps #

☐ Violation for Unauthorized Activity Corps #

☐ Wetland and Waters Delineation Corps #

- ☐ A wetland / waters delineation has been completed (if so, provide a copy with the application)
- ☐ The Corps has approved the wetland / waters delineation within the last 5 years

(8) IMPACTS, RESTORATION/REHABILITATION, COMPENSATORY MITIGATION

A. Describe unavoidable environmental impacts that are likely to result from the proposed project. Include permanent, temporary, direct, and indirect impacts.

B. For temporary removal or fill or disturbance of vegetation in waterways, wetlands or riparian (i.e., streamside) areas, discuss how the site will be restored after construction.

Compensatory Mitigation

☐ Permittee-responsible Onsite Mitigation

☐ Permittee-responsible Offsite mitigation

D. Provide a brief description of mitigation approach and the rationale for choosing that approach. If you believe mitigation should not be required, explain why.

(9) ADJACENT PROPERTY OWNERS FOR PROJECT AND MITIGATION SITE		
☐ Pre-printed mailing labels of adjacent property owners attached	**Project Site Adjacent Property Owners**	**Mitigation Site Adjacent Property Owners**

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

Contact Name
Address 1
Address 2
City, State ZIP Code

(10) List of Other Certificates or Approvals/Denials received from other Federal, State, or Local Agencies for Work Described in This Application.					
Agency	Approval Type	Number	Date Applied	Date Approved	Date Denied

(11) SIGNATURES	
Application is hereby made for the activities described herein. I certify that I am familiar with the information contained in the application, and, to the best of my knowledge and belief, this information is true, complete and accurate. I further certify that I possess the authority to undertake the proposed activities. I hereby authorize the person identified in the authorized agent block below to act in my behalf as my agent in the processing of this application and to furnish supplemental information in support of this permit application. I understand that the granting of other permits by local, county, state or federal agencies does not release me from the requirement of obtaining the permits requested before commencing the project.	
Applicant Signature	
Print Name	Title
Signature	Date
Authorized Agent Signature	
Print Name	Title
Signature	Date
Landowner Signature(s)	
Landowner of the Project Site (if different from applicant)	
Print Name	Title
Signature	Date
Landowner of the Mitigation Site (if different from applicant)	
Print Name	Title
Signature	Date

(12) ATTACHMENTS

- ☐ **Drawings (items in bold are required)**
  - ☐ **Location map with roads identified**
  - ☐ **U.S.G.S topographic map**
  - ☐ **Tax lot map**
  - ☐ **Site plan(s)**
  - ☐ **Cross section drawing(s)**
  - ☐ **Recent aerial photo**
  - ☐ Project photos
  - ☐ Erosion and Pollution Control Plan(s), if applicable
- ☐ Pre-printed labels for adjacent property owners (Required if more than 5)
- ☐ Restoration plan or rehabilitation plan for temporary impacts
- ☐ Alternatives analysis
- ☐ Biological assessment (if requested by Corps project manager during pre-application coordination.)
- ☐ Other:
  - ☐
  - ☐

INSTRUCTIONS FOR PREPARING THE PERMIT APPLICATION

General Instructions and Tips

- Provide the information in the appropriate blocks of the application form. If you need more space, provide a summary in the space provided and attach additional detail as an appendix to the application.
- Not all items on the application form will apply to all projects.
- For most applications, binding and section dividers are not necessary and require additional handling.

The information requested on the form is necessary for the agency to begin the review. For complex projects or for those that may have more than minimal impacts, additional information may be necessary to complete the evaluation and make a permit decision. Alternative forms of permit applications may be acceptable; contact the Corps for more information.

Section 1. Applicant and Landowner Contact information

Applicant: The applicant is the responsible party. If the applicant is an agency, business entity or other organization, indicate the name of the organization and a person that has the authority to sign the application.
Authorized Agent: An authorized agent is someone who has permission from the applicant to represent their interests and supply information to the agencies. An agent can be a consultant, an attorney, builder, contractor, or any other person or organization. An authorized agent is optional.
Landowner: Provide landowner information if different from the applicant. The landowner must also sign the application.

Section 2. Project Information

Provide location information. Latitude and longitude can be found by zooming in to your respective project location and reading off the coordinates displayed on the bottom of the map on Google earth.
Provide information on wetlands and waterways within the project area. Indicate the category of activities that make up your project.

Section 3. Project Purpose and Need

Explain the purpose and need for the project. Also include a brief description of any related activities needed to accomplish the project objectives.

Section 4. Description of Resources in Project Area

For each wetland, include:

- Whether the wetland is freshwater or tidal, and the Cowardin class and Hydrogeomorphic (HGM) class.
- Source of hydrology and direction of flow (if any).
- Dominant plant species by layer (herb, shrub, tree).
- Refer to wetland delineation report if available, and provide copies to the agency (if not previously provided).
- Describe existing uses, including fish and wildlife use (type, abundance, period of use, significance of site).

For rivers, streams, other waterways, lakes and ponds, include a description of, as applicable:

- Streamflow regime (e.g., perennial year-round flow, intermittent seasonal flow, ephemeral event-driven flow). If flow is ephemeral, provide a stream flow assessment or other information that supports your determination.
- Field indicators used to identify the Ordinary High Water Mark (OHWM).
- Channel and bank conditions.
- Type and condition of riparian (streamside) vegetation.
- Channel morphology (structure and shape).
- Stream substrate.
- Assessment of the functional attributes including hydrologic, geomorphic, biological and chemical and nutrient related functions.
- Fish and wildlife (type, abundance, period of use, significance of site).

Section 5. Alternatives to Avoid and Minimize Impacts to Waters

Provide a brief explanation describing how impacts to waters and wetlands are being avoided and minimized on the project site. The alternatives analysis must include:

- Project-specific criteria that are needed to accomplish the stated project purpose.
- A range of alternative sites and designs that were considered with less impact.
- An evaluation of each alternative site and design against the project criteria and a reason for why the alternative was not chosen.
- If the project involves fill in an estuary for a non-water dependent use, a description of Alternative non- estuarine sites must be included.

Section 6. Project Description

Overall Description. Provide a brief description of the overall project, including:

- All associated work with the project both outside and within waters or wetlands.
- Include both temporary and permanent work.
- Total ground disturbance for all associated work (i.e., area and volume of ground disturbance).
- Total area of impervious surfaces created or modified by the project, if applicable.

Work within Waters and Wetlands. Provide a description of the proposed work within waters and wetlands, including:

- Each removal or fill activity proposed in waters or wetlands, as well as any construction or maintenance of in-water or over-water structures.
- The number and dimensions of in-water or over-water structures (i.e., pilings, floating docks) proposed within waters or wetlands.

Fill Material and Disposal. Provide a description of fill material and procedure for disposal of removed material, including:

- The source(s) of fill materials (if known).
- Locations for disposal area(s) for dredged material, if applicable. If dredged material is to be discharged on an upland site, identify the site and the steps to be taken (if necessary) to prevent runoff from the dredged material back into a waterbody.

Construction Methods. Describe how the removal and/or fill activities will be accomplished including the following:

- Construction methods, equipment to be used, access and staging areas, etc.
- Measures you will use during construction to minimize impacts to the waterway or wetland. Examples may include isolating work areas, controlling construction access and using specialized equipment or materials. Attach work area isolation and/or erosion and pollution control plans, if applicable.

Construction Timing. Provide the proposed start and completion date for the project. Describe project work that is already complete, if applicable.

Summary of removal and fill activities. Summarize the dimensions, volume and type/composition of material being placed or removed in each waterbody or wetland. Describe each impact on a separate row. For instance, if two culverts are being removed from Clear Creek, use two rows. Add extra rows if needed, or include an attachment.

Section 7. Additional Information

Any additional information you provide helps the reviewer(s) understand your project and the other approvals or reviews that may be required. Is the project located within any of the following:

Wetlands, mudflats, vegetated shallows/seagrass beds, coral reefs, riffle and pool complexes?

Section 8. Site Restoration/Rehabilitation and Compensatory Mitigation
Site Restoration/Rehabilitation. For temporary disturbance of soils and/or vegetation in waterways, wetlands or riparian (streamside) areas, discuss how you will restore the site after construction. This may include the following:

- Grading plans to restore pre-existing elevations.
- Planting plans and species list (native species only) to replace vegetation in riparian or wetland areas.
- Maintenance and monitoring plans to document restoration to wetland condition and/or vegetation establishment.
- Associated erosion control for site stabilization.

Compensatory Mitigation. Describe your proposed compensatory mitigation approach, or explain why you believe compensatory mitigation is not required. If proposing permittee-responsible mitigation for permanent impact to wetlands, see 33 CFR 332.4(c) for plan requirements. For permanent impact to waters other than wetlands, 33 CFR 332.4(c) for plan requirements.

Section 9. Adjacent Property Owners for Impact and Mitigation Site(s)
Names and addresses for properties that are adjacent to the project site and permittee responsible mitigation site (if applicable), are required. "Adjacent" means those properties that share or touch upon a common property line or are across the street or stream. If more than 5, attach pre-printed labels.

Section 10. **List of Other Certificates or Approvals/Denials received from other Federal, State, or Local Agencies for Work Described in This Application.**

Section 11. Signatures
The application must be signed by the responsible party, landowner and agent, as identified in section 1.

Section 12: Attachments
Project Drawings. A complete application must include a location map, site plan, cross-section drawings and recent aerial photo (See examples). All drawings should be clear, legible and formatted for 8.5 by 11 printing. Larger drawings may be submitted in addition to the 8.5 by 11 size. Use the fewest number of sheets necessary for your drawings or illustrations. While illustrations need not be professionally prepared, they should be clear, accurate, and contain all necessary information, as follows:

Location maps (with subject property identified):

- Location map with roads identified
- U.S.G.S. Topographic map
- Tax lot map (with subject tax lot(s) identified)

Site plan(s), including:

- Entire project site and activity areas
- Existing and proposed contours
- Location of ordinary high water, wetland boundaries or other jurisdictional boundaries (include wetland delineation report if not previously provided)
- Identification of temporary and permanent impact areas within waterways or wetlands
- Map scale or dimensions and north arrow
- Location of staging areas and construction access
- Location of cross section(s), as applicable
- Location of mitigation area, if applicable

Cross section drawing(s), including:

- Existing and proposed elevations
- Identification of temporary and permanent impact areas within waterways or wetlands
- Ordinary high water and/or wetland boundary or other jurisdictional boundaries
- Map scale or dimensions

Recent Aerial photo

- 1:200, or if not available for your site, highest resolution possible.

August 6, 2015

Ms. Michelle Lynch
Chief
Regulatory Office
Honolulu District, U.S. Army Corps of Engineers
Department of the Army
Fort Shafter, HI 96858-5440

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Lynch:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number F002 and will be included, along with this response letter, in appendix A of the final EIS.

The Army and Hawaiian Electric understand that any work that would result in a discharge of fill material to a water of the United States would require a section 404 permit. As described in section 3.7 of the draft EIS, construction would occur near the Waikele Stream and the South Fork of the Kaukonahua Stream, but no fill would be discharged to those waters of the United States and best management practices would be used to control stormwater runoff and erosion. Therefore, it is anticipated that the proposed project would not require a section 404 permit. Hawaiian Electric would, however, upon completion of the final design for the SGSP, make a final determination as to whether a section 404 permit is necessary and would apply for and obtain one if required.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

F003

JUN 0 8 2015

Department of the Army
Directorate of Public Works
United States Army Garrison, Hawaii
ATTN: IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Subject: Draft Environmental Impact Statement for the Schofield Generating Station Project, United States Army Garrison, Schofield Barracks, Hawaii (CEQ# 20150108)

Dear Ms. Graham:

F003a

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Schofield Generating Station Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA supports the U.S. Army's goals of improving energy security and increasing renewable energy generation at Army facilities. Accelerating the development of renewable resources and the deployment of clean energy technologies in Hawaii will help the state meet its energy demand, reduce dependence on imported oil, create new jobs, and provide for increased energy security, while reducing greenhouse gas emissions. EPA understands that the proposed Schofield Generating Station Project (SGSP) would result in the construction and operation of a 50 megawatt capacity biofuel-capable power generation plant that would operate on biofuel or a mix of biofuel and either diesel or liquefied natural gas (LNG). As such, it would be a potential source of renewable power that would provide energy security to Schofield Barracks, Wheeler Army Airfield, and Field Station Kunia in the event that service is lost from normal sources supporting these facilities, while providing Hawaiian Electric Company with a quick-starting facility in a secure location away from the coastline.

Based on our review of the DEIS, we have rated the proposed project and the document *as Environmental Concerns – Insufficient Information* (EC-2). Please see enclosed *Summary of EPA Rating Definitions*. While the air quality analysis in the DEIS includes emissions estimates for criteria pollutants, hazardous air pollutants, and greenhouse gases for three different SGSP operating scenarios based on different fuel mixes, it does not include emission estimates for construction, mobile sources, or ground disturbance. In addition, the DEIS does not address the issue of sustainability, as it pertains to biofuels. Using biofuels has the potential to reduce greenhouse gas emissions, but only if the biofuels are developed in a sustainable manner.

We recommend that the Army provide, in the Final EIS, an updated air quality analysis that includes estimates for construction emissions. We also recommend that the Final EIS provide additional information on biofuels, including measures to ensure that feedstocks are grown and converted into fuel in a sustainable manner. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the Final EIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: ENF-4-2). If you have any questions, please contact me at 415-972-3521, or contact Ann McPherson, the lead reviewer for this project. Ann can be reached at 415-972-3545 or mcpherson.ann@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosures: Summary of the EPA Rating System
EPA's Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

U.S. EPA DETAILED COMMENTS ON THE SCHOFIELD GENERATING STATION PROJECT, DRAFT ENVIRONMENTAL IMPACT STATEMENT, UNITED STATES ARMY GARRISON, SCHOFIELD BARRACKS, HAWAII, JUNE 8, 2015

Sustainability of Biofuels

F003b

The Draft Environmental Impact Statement (DEIS) indicates that the Schofield Generating Station Project (SGSP) would be capable of using several types of fuels, including locally produced biofuels, if and when they become available (pg. 4-8), but it does not discuss the sustainability of biofuels as a feedstock for the facility. Life cycle emissions, including greenhouse gases (GHG), from biofuel are generally much lower than from fossil fuel;[1] however, the benefits of biofuels are only fully realized if the fuels are developed in a sustainable manner. Otherwise, the net benefits may be diminished by the impacts on water, soil, biodiversity, air, habitats, and waste generation that can result from the cultivation of crops for biofuel.

Assessing the net effect of a biofuel on GHG emissions requires analysis of emissions throughout the biofuel's life cycle, including: planting and harvesting the crop; processing the feedstock; transporting the feedstock and final fuel; and storing, distributing and retailing the biofuel. Critical factors related to the agricultural production process include fertilizer and pesticide use, irrigation technology, and soil treatment. Land-use changes associated with expanded biofuel production can also have a major impact. It is important to note that lifecycle emissions of biodiesel vary according to feedstock, with biodiesel produced from waste grease resulting in lower net GHG emissions than those produced from soybeans. The DEIS does not discuss lifecycle emissions of biofuels, diesel, or liquefied natural gas (LNG).

In 2007, the Hawaiian Electric Company and the Natural Resources Defense Council joined in developing an environmental policy to guide the utility's procurement of biofuel from sustainable produced feedstock. Revised in 2013, the policy[2] asserts that a transition from petroleum fuels to biofuels derived from sustainably-produced and, preferably, locally-sourced feedstock offers enormous potential for near-term, dramatic reductions in GHG emissions and increased security from continuing oil market price hikes and potential supply interruptions. Under the revised policy, Hawaiian Electric will purchase biofuels only from suppliers that comply with RSB[3] Principles & Criteria for agricultural, end-of-life[4] and waste water[5] feedstock or similar certifications. The DEIS does not mention this policy.

Recommendations:

Discuss, in the Final Environmental Impact Statement, the issue of sustainability as it relates to biofuels that may be used in the proposed facility. Include consideration of biofuels produced in Hawaii, as well as biofuels produced elsewhere, since either may be used in the SGSP.

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[1] IPCC, 2011: IPCC Special Report on Renewable Energy Sources and Climate Change Mitigation. Prepared by Working Group III of the Intergovernmental Panel on Climate Change. See internet address: http://srren.ipcc-wg3.de/report/ , pp. 732 and 734, figures 9.8 and 9.9.

[2] See internet address: https://www.hawaiianelectric.com/vcmcontent/StaticFiles/pdf/HECO-NRDC_Biodiesel_Policy.pdf

[3] In March 2011, the Roundtable on Sustainable Biomaterials (formally the Roundtable on Sustainable Biofuels "RSB") launched a global, universal sustainability standard which describes the requirements for sustainably-produced biofuels and biomass.

[4] End-of-life products include Municipal Solid Waste and Used Cooking Oil.

[5] Waste water includes greases, fats, and any other lipid-rich material, which can be transformed into biodiesel, as well as starchy material or cellulosic elements, which can be used to produce bioethanol.

Include, in the Final EIS, a lifecycle analysis of GHG emissions associated with biofuels, diesel, and LNG.

Discuss, in the Final EIS, the environmental policy for Hawaiian Electric Company's procurement of biofuel from sustainably produced feedstock, and how the U.S. Army and/or Hawaiian Electric would ensure that biofuel used in the SGSP would be produced sustainably.

Consider incorporating into the project a commitment by the Army and/or Hawaiian Electric to use a third-party certification system to verify that biofuel feedstocks are grown and converted into fuel in a sustainable manner. Such systems measure and verify environmental performance of fuels throughout all major stages of the product life cycle, including feedstock production, fuel production, and end use, while considering a range of criteria at each stage that address impacts on water, soil, biodiversity, air, land use, and waste.

Air Quality

F003c

Air Emissions from Construction

The DEIS does not provide estimates for air emissions associated with the construction of the SGSP and installation of the transmission lines. Instead, the document states that there will be short-term minor adverse effects that would end when construction ended (pg. 3-30). An evaluation is necessary to ensure compliance with state and Federal air quality regulations and to disclose the potential impacts from temporary or cumulative degradation of air quality.

Recommendations:

In the Final EIS, describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions. Specify emission sources by pollutant from mobile sources and ground disturbance, including the transport of fuel.

F003d

Air Emissions from the SGSP

Table 3.4-1 in the DEIS presents federal and state air quality standards and the monitored concentrations of criteria pollutants at the monitoring location closest to Schofield Barracks (pg. 3-24). The DEIS does not identify the monitoring location or the time period for monitor data presented in Table 3.4-1.

Recommendation:

Identify, in the Final EIS, the location and time period for monitor data presented in Table 3.4-1.

F003e

In Section 3.4.2.1.2.4, the DEIS states that preliminary modeling inputs, assumptions, and results are contained in Hawaiian Electric's *Prevention of Significant Deterioration & Covered Source Permit Application for the SGSP* and supplemental modeling report (Hawaiian Electric, 2014 a, 2014c). More recent information is available in the PSD & CSP permit application for the SGSP submitted by Hawaiian Electric in January 2015.

Recommendation:

Include, in the Final EIS, a reference to Hawaiian Electric's January 2015 *Prevention of Significant Deterioration & Covered Source Permit Application for the SGSP.*

F003f

Table 3.4-6 in the DEIS presents estimated emissions of criteria pollutants, hazardous air pollutants, and GHGs under three operating scenarios for the SGSP (pg. 3-31). Table 3.4-7 presents estimates for the SGSP's Potential to Emit (PTE) and compares it to PSD Major Source Thresholds. We compared data in these two tables to values presented in Table 2.0-1 of the *Prevention of Significant Deterioration & Covered Source Permit Application for the SGSP (January 2015).* Discrepancies were noted for the following parameters:

	Table 3.4-7	Table 2.0-1
PM_{10}	139.8	130.1
$PM_{2.5}$	139.8	130.1
Lead	0.0	0.03
Fluorides	0.0	0.02
Mercury	0.0	0.002
SO_2	10.1	9.4

Recommendation:
Ensure that the values for PM_{10}, $PM_{2.5}$, lead, fluorides, mercury, and SO_2 are correct in Table 3.4-7. Explain why they differ from those presented in Table 2.0-1 of the PSD/CSP permit application.

F003g

Hawaiian Electric also submitted a *Proposed Schofield Generating Station Weight of Evidence Ambient Air Quality Analysis*, dated January 2015. There were minor differences in the maximum predicted concentrations for PM_{10}, $PM_{2.5}$, and NO_2, compared to the September 2014 submittal.

Recommendation:
Ensure that the values for PM_{10}, $PM_{2.5}$, and NO_2 are correct in the Final EIS.

F003h

Indirect Emission Reductions
According to the DEIS, the operation of the generating station would indirectly reduce the emissions of some criteria pollutants and GHGs by reducing the use of off-post fossil fuel-based electricity (pg. 3-29). Table 3.4-8 indicates that the indirect reductions in regional emissions of SO_2 and GHGs, (and NOx, in the case of LNG) would be beneficial and appreciably greater than direct operational emissions from the proposed SGSP. The DEIS does not define, however, what type of fossil fuel combustion project was used to estimate the emission reductions shown in Table 3.4-8. In addition, the values for SO_2 differ between Tables 3.4-6 and 3.4-8.

Recommendations:
Specify the type of fossil fuel combustion project that was used to calculate the indirect emission reductions shown in Table 3.4-8.

Ensure that the values used for SO_2 emissions are correct in Tables 3.4-6 and 3.4-8. If they differ, explain why.

F003i

Nonbiogenic CO_2e Emissions

In Table 3.4-6, GHG emissions are calculated for six constituents – carbon dioxide, N_2O, methane, total carbon dioxide equivalent, biogenic CO_2e, and nonbiogenic CO_2e. Table 3.4-5 summarizes which operating scenarios provide the highest and lowest levels of emissions for criteria pollutants, HAPs, and GHGs. According to Table 3.4-5, GHG emissions are lowest for 100% biodiesel. According to the GHG data presented in Table 3.4-6, however, only nonbiogenic CO_2e emissions are lowest for 100% biodiesel (pg. 3-31).

Footnote "b" in Table 3.4-5 states that GHGs are net, based on life cycle analysis, including nonbiogenic CO_2e, as reflected in Table 3.4-8 (pg. 3-30). However, a note at the bottom of Table 3.4-8 states that nonbiogenic emissions do not account for increases from transportation, storage, and processing of fuels or other indirect sources of GHGs (pg. 3-35). These two notes seem to be contradictory; therefore, it is unclear whether a lifecycle analyses has been completed for any component of the fuel system.

Recommendations:

Clarify, in the Final EIS, whether the values utilized in Table 3.4-5 for GHGs represent only nonbiogenic CO_2e emissions or all CO_2e emissions.

Clarify whether a lifecycle analysis has been completed for biodiesel, diesel, or LNG, and if so, whether the lifecycle analyses included biogenic CO_2e and/or nonbiogenic CO_2e.

Ensure that footnote "b" in Table 3.4-5 and the note at the bottom of Table 3.4-8 regarding nonbiogenic emissions are correct. Revise if necessary.

F003j

Biogenic CO_2e emissions

According to the DEIS, it is generally understood that GHG emissions from the burning of biogenic fuels do not increase the total amount of GHGs in the Earth's atmosphere and, therefore, do not contribute to global warming as much as the burning of fossil fuels (pg. 3-28). The DEIS acknowledges that there are often indirect CO_2 emissions and changes in carbon sequestration from land use changes if the energy consumption for harvesting or production of biofuels is included in the analysis. In addition, transportation, storage, and processing of biofuel also have some amount of CO_2 emissions. The DEIS mentions that EPA is studying the effects of these and other factors to more accurately account for biogenic CO_2 emissions from stationary sources and includes a reference for EPA's 2011 report, *Draft Accounting Framework for Biogenic Carbon Dioxide (CO_2) Emissions from Stationary Sources*.

More up to date information is available. In November 2014, the EPA released a second draft of the technical report, *Framework for Assessing Biogenic CO_2 from Stationary Sources*. This revised report presents a framework for assessing the extent to which the production, processing, and use of biogenic material at stationary sources results in a net atmospheric contribution of biogenic CO_2 emissions. In addition, EPA's current thinking pertaining to biogenic CO_2 emissions within the context of the Clean Power Plan and the Prevention of Significant Deterioration Program is described in a memorandum dated November 19, 2014. Links to these documents and further information on CO_2 emissions associated with bioenergy and other biogenic sources can be found at EPA's webpage: http://www.epa.gov/climatechange/ghgemissions/biogenic-emissions.html.

Recommendation:
Update, in the Final EIS, the status of EPA's involvement in assessing biogenic CO_2 emissions from stationary sources.

F003k

CEQ's Revised Draft Guidance on Greenhouse Gases and Climate Change
On December 24, 2014, the Council on Environmental Quality released, for public comment, revised draft guidance that describes how federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their NEPA reviews. The revised draft guidance supersedes the draft greenhouse gas and climate change guidance released by CEQ in February 2010.

Recommendation:
Update, in the Final EIS, Section 3.4.1.5, *Regulatory Setting and Permitting for GHG*, to reflect the new CEQ draft guidance.

Hawaii's Clean Energy Initiative and H.B. 623

F003l

The DEIS discusses Hawaii's renewable portfolio standard (RPS) goals (pg. 1-6), but information about the Hawaii Clean Energy Initiative and recent legislation focused on increasing Hawaii's RPS goals is not included. The Hawaii Clean Energy Initiative (HCEI) is a partnership between the State of Hawaii and the U.S. Department of Energy, launched in 2008, that set the goal of achieving 70% clean energy generation in Hawaii by 2030 – including 40% of the State's energy from renewable sources and 30% from efficiency measures. Renewable fuels, including biofuels and other non-petroleum based fuel that can be produced sustainably, are an essential part of the HCEI energy strategy.

H.B. 623 was launched in January 2015, approved by legislators in May 2015, and is currently under review by the Hawaii Governor's office. H.B. 623 would increase Hawaii's RPS goals to 30% by December 31, 2020, 70% by December 31, 2040, and 100% renewable energy by December 31, 2045. The purpose of this legislation is to further reduce Hawaii's dependence on imported fossil fuels and promote the growth of the state's renewable energy industry.

Recommendations:
Discuss, in the Final EIS, the Hawaii Clean Energy Initiative, recent updates to it, and its strategy for biofuels.

Update, in the Final EIS, the discussion on Hawaii's RPS goals to include H.B. 623.

August 6, 2015

Ms. Kathleen Martyn Goforth
Manager
Environmental Section Review
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Goforth:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number F003 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from F003b to F003l (F003a is the introduction and EIS rating information provided with your letter). Your letter, with the annotations included, is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

F003b. Thank you for your comments on the sustainability of biofuels. To address your concerns, the final EIS will include a discussion of the "Environmental Policy for Hawaiian Electric Companies' Procurement of Biofuel from Sustainably Produced Feedstock," prepared by Hawaiian Electric Company and the Natural Resources Defense Council, as revised August 2013. As you note, the revised policy provides that Hawaiian Electric will purchase biofuels only from suppliers that comply with the Roundtable on Sustainable Biomaterials (formerly the Roundtable on Sustainable Biofuels) ("RSB") Principles & Criteria for agricultural, end-of-life and wastewater feedstock or similar certifications.

The following additional text has been added to section 2.2.1.5 of the final EIS:

> "One of Hawaiian Electric's goals remains to reduce Hawaii's dependence on imported fossil fuel and the adverse environmental and economic impact of burning fossil fuel to generate electricity for residents and visitors to the Hawaiian Islands. A transition from petroleum fuels to biofuels derived from sustainably-produced and preferably locally-sourced feedstock offers potential for near-term reductions in GHG emissions and increased security from continuing oil market price

volatility and potential supply interruptions. Hawaiian Electric maintains a biofuel purchasing policy that was developed in cooperation with the National Resources Defense Council (NRDC) in 2007 and updated in 2013 (Hawaiian Electric 2013). This policy outlines Hawaiian Electric's preference for procurement of locally sourced biofuel and their requirements for obtaining biofuel generated from sustainable sources. The policy includes a section on local feedstock support mechanisms that discusses Hawaiian Electric's support for development of local biofuel producers, and a section on sourcing requirements for biofuel that requires third-party certification of biofuel sourcing. A copy of the policy has been included as Appendix B."

The following additional text has been added to section 3.4.2.1.2.5, Indirect Effects, of the final EIS:

"GHG emissions outlined in Table 3.4.9 do not account for increases from transportation, storage, and processing or other indirect sources of GHGs, and as such may be higher than those shown. The *IPCC Special Report on Renewable Energy Sources and Climate Change* indicates that lifecycle GHG emissions from all first- and next-generation biofuels have lower lifecycle GHG emissions compared to fossil fuels (IPCC 2012). Table 3.4-9 shows overall ranges of lifecycle GHG emissions from biofuels, natural gas, and oil/diesel. The median lifecycle GHG emissions of all biofuels are between 450 and nearly 1,000 grams CO_2e/kWh lower than their fossil-fueled counterparts. The maximum lifecycle GHG emissions for any biopower scenario is 75 grams CO_2e/kWh; whereas the minimum lifecycle GHG emissions for any fossil fuel scenario is 290 grams CO_2e/kWh. Therefore, regardless of the exact source of and type of biofuel ultimately used, the total lifecycle GHG emissions would be no more than 26 percent of those generated by fossil fuels for the same amount of electricity. The use of biofuels under the Proposed Action would have a net benefit to the environment when compared to using fossil fuels under the No Action Alternative. This is representative of all biofuels and all biopower processing and transportation scenarios. These effects would be moderately beneficial.

Table 3.4-9. Lifecycle GHG Emissions from Biofuels and Fossil Fuels

Values	Lifecycle GHG Emissions (grams CO_2eq/kWh)			
	Biofuels[a]	Natural Gas	Oil/Diesel Fuel	Coal
Minimum	-633	290	510	675
50th percentile	18	469	840	1001
Maximum	75	930	1170	1689

Source: IPCC 2012.

[a] Negative estimates for biopower are based on assumptions about avoided emissions from residues and wastes in landfill disposals and co-products."

The following references were updated or added:

Hawaiian Electric and Natural Resources Defense Council. 2013. *Environmental Policy for Hawaiian Electric Companies' Procurement of Biofuel from Sustainably Produced Feedstock.*

IPCC. 2012. *IPCC Special Report on Renewable Energy Sources and Climate Change.* Cambridge University Press, Cambridge, United Kingdom, 1000 pp.

The Hawaiian Electric biofuels purchasing policy has been included as appendix B to the EIS.

F003c. The following additional text has been added to section 3.4.2.1.1, Construction:

> "Construction emissions were estimated for fugitive dust, on- and off-road diesel equipment, delivery vehicles (including fuel delivery), and worker trips (Table 3.4-5). The estimated construction emissions would be *de minimis* (of minimal importance) and would have minor adverse effects. For analysis purposes, it was assumed that all construction activities would be compressed into a single 12-month period. Therefore, regardless of the ultimate implementation schedule, annual emissions would be less than those shown herein. Moderate changes in the quantity and types of equipment used would not have a substantial influence on the emission estimates and would not change the level of effects under NEPA."

Table 3.4-5.
Estimated Emissions from Construction of the SGSP

Activity/Source	CO	NO_x	VOC	SO_x	PM_{10}	$PM_{2.5}$	CO_2
Heavy Equipment	2.8	5.7	0.8	<0.1	0.3	0.3	453.7
Delivery of Equipment	1.2	1.3	0.2	<0.1	<0.1	<0.1	150.1
Surface Disturbance	0.0	0.0	0.0	0.0	1.9	0.1	0.0
Worker Commutes	1.8	0.2	0.2	3.7	<0.1	<0.1	191.3
Total Emissions	5.8	7.2	1.2	3.7	2.3	0.5	795.1

Source: CARB 2012, SCAQMD 1993, USEPA 1995."

Mitigation measures and best management practices for construction emissions are outlined in section 3.4.2.1.3.

The following references were updated or added:

> CARB (California Air Resources Board). 2012. EMFAC Emission Rates Database. Accessed June 2015. http://www.arb.ca.gov/emfac/2011/.
>
> EPA (U.S. Environmental Protection Agency). 1995. AP42, Fifth Edition, Volume I: Stationary Point and Area Sources. Accessed May 2015. http://www.epa.gov/ttn/chief/ap42/.
>
> SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook. South Coast Air Quality Management District, Diamond Bar, CA.

F003d. Monitored concentrations in the table are 2011 measurements from the Honolulu, Hawai'i, monitoring station obtained from EPA's AirData website: http://www.epa.gov/airdata/ad_rep_con.html.

The following additional text has been added to section 3.4.1.1, National Ambient Air Quality Standards and Attainment Status:

> "Table 3.4-1 is provided for reference and compares recent monitored concentrations to federal and state air quality standards. Monitored concentrations were the values reported for 2011 by the Hawaii Department of Health Clean Air Branch Honolulu monitoring station obtained from the EPA AirData database."

F003e. Reference to Hawaiian Electric's Prevention of Significant Deterioration & Covered Source Permit Application for the SGSP has been added to section 3.4.2.1.2.4.

F003f. Table 3.4-7 in the EIS has been updated based on the comment to be consistent with Table 2.0-1 in *Prevention of Significant Deterioration & Covered Source Permit Application for the SGSP (January 2015)*. Note that the table has been renumbered to Table 3.4-8 due to the addition of a new table in the Air Quality section of the EIS. The former Table 3.4-7 was prepared before the latest revision to the air permit application, which led to the inconsistencies.

F003g. See response to comment F003f.

F003h. Emission factors used to calculate the indirect reductions shown in Table 3.4-8 came directly from the EPA's *eGRID2012 Version 1.0 Year 2010 Summary Tables - Island of Oahu*. Note that the table has been renumbered to Table 3.4-9 due to the addition of a new table in the Air Quality section of the EIS.

Sulfur dioxide (SO_2) emissions in the table have been updated to be consistent with the *Proposed Schofield Generating Station Weight of Evidence Ambient Air Quality Analysis*, dated January 2015.

F003i. This comment is consistent with Table 3.4-5 in the draft EIS. Note "b" confirms that the comparison of SGSP operating scenarios in the table is based on nonbiogenic CO2e, as reflected in Table 3.4-8 in the draft EIS.

Lifecycle analysis of greenhouse gas (GHG) emissions has not been performed. GHG emissions shown in Tables 3.4-6 and 3.4-9 (formerly Tables 3.4-5 and 3.4-8) do not account for emissions from transportation, storage, and processing of fuels or other indirect sources of GHGs, and as such could be higher than those in Table 3.4-9. Note "b" for Table 3.4-6 has been updated to read:

> "Net based on nonbiogenic CO_2e, as reflected in table 3.4-8."

F003j. Reference to EPA's 2011 report, *Draft Accounting Framework for Biogenic Carbon Dioxide (CO_2) Emissions from Stationary Sources,* has been updated as follows:

> EPA (U.S. Environmental Protection Agency). 2014. *Accounting Framework for Biogenic CO2 Emissions from Stationary Sources*. Accessed June 2015. http://yosemite.epa.gov/sab/sabproduct.nsf/0/2F9B572C712AC52E8525783100704886/$File/Biogenic_CO2_Accounting_Framework_Report_LATEST.pdf.

Information in the references outlined in the comment is consistent with sections 3.4.1.4 and 3.1.4.5 of the EIS. Specifically, the EPA memorandum states that:

> "... the EPA is working through the legal process to respond to the Supreme Court's decision in Utility Air Regulatory Group v. EPA and the proceedings currently before the United States Court of Appeals for the District of Columbia Circuit. When developing the PSD regulations described above, the EPA intends to consider the outcome of this process and coordinate its PSD regulations specific to biogenic CO_2 emissions with other rule revisions that may be necessary to address application of PSD permitting requirements to GHGs."

F003k. Text in section 3.4.1.5 has been updated as follows:

> "In 2014, CEQ released draft guidance on when and how federal agencies should consider GHG emissions and climate change in NEPA analyses."

Information in the revised draft guidance is consistent with section 3.4.1.5 of the EIS.

F003l. As you note, the Hawai'i Clean Energy Initiative (HCEI) is a partnership between the state of Hawai'i and the U.S. Department of Energy, with the intent to conserve energy and increase local and renewable energy sources. Since 2008, the HCEI has brought together energy sector stakeholders to define renewable energy goals, and for the electrical energy sector those goals have been incorporated into state law as Renewable Portfolio Standards (RPS).

The SGSP will contribute to Hawaiian Electric's ability to meet RPS requirements as discussed in section 1.4.3 of the EIS. Subsequent to the publication of the draft EIS and the receipt of your comment, H.B. 623 was signed into law, and section 1.4.3 of the EIS has been updated as follows:

> "HRS section 269-92 (as amended by the 2015 State Legislature) sets the following Renewable Portfolio Standards (RPS) targets for the Hawaiian Electric Companies (Hawaiian Electric; Maui Electric Company, Ltd.; and Hawaii Electric Light Company, Inc.) and all other electric utilities in the state to:
>
> - 10 percent of net electricity sales by December 31, 2010.
> - 15 percent of net electricity sales by December 31, 2015.
> - 30 percent of net electricity sales by December 31, 2020.
> - 40 percent of net electricity sales by December 31, 2030.
> - 70 percent of net electricity sales by December 31, 2040.
> - 100 percent of net electricity sales by December 31, 2045.
>
> The Hawaiian Electric companies have achieved 18 percent of net electricity sales from renewable energy in 2014. Because of its ability to use substantial amounts of biofuel in a cost-effective manner, the proposed SGSP would contribute to Hawaiian Electric's ability to continue increasing the proportion of the renewable energy it generates to meet or exceed the RPS and other long-range renewable energy goals."

State policies, strategies, and goals regarding the use of specific fuels (e.g., biofuels or natural gas) are less clearly defined than the RPS goals and are the subject of ongoing discussions between multiple stakeholders. As a result, the EIS focuses on the SGSP's ability to contribute to state RPS achievement and not fuel-use policies. Hawaiian Electric's fuel-related requirement for the SGSP is for the project to be multifuel-capable (both liquid and gaseous fuels, including biofuels), so as to be able to support the company's ability to comply with fuel-related policies as they develop. This requirement is discussed in section 2.1 of the EIS.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

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<lisa.m.graham52.civ@mail.mil<mailto:lisa.m.graham52.civ@mail.mil>>, "Heath, Garvin"
<Garvin.Heath@nrel.gov<mailto:Garvin.Heath@nrel.gov>>
Subject: Hawaiian Electric's Response to EPA's comments on the Draft EIS for the Schofield Generating Station Project

Dear Mr. Shriver,

Thank you for responding to EPA's comments on the Draft Environmental Impact Statement for the Schofield Generating Station Project in your letter dated August 6, 2015. We appreciate the opportunity to see how our comments will be addressed and to offer additional feedback before the publication of the Final EIS.

There is one item, F003b, on page 2 of your letter that we are concerned about. The letter states that additional text has been added to Section 3.4.2.1.2.5, Indirect Effects, of the Final EIS, including Table 3.4-9. We note, however, that two of the values listed for Biofuels, as presented in Table 3.4-9, are incorrect. These values come from Table A.II.4 of Annex II. However, there was an errata sheet published which affects Table A.II.4. (See errata for pg. 982: http://srren.ipcc-wg3.de/report/errata). The correct values are located at the following website: http://srren.ipcc-wg3.de/report/ipcc_wg3_srren_annexii_tableaii.4_errata.pdf. Due to these changes, the proposed text that compares maximum and minimum lifecycle GHG emissions is thus, incorrect, and should be revised.

Also, the lifecycle GHG emission estimates presented in Table A.II.4 include all "indirect" effects such as transportation, storage and processing. The estimates do not, however, account for any additional emissions associated with transportation to and from Hawaii. The first sentence of the suggested paragraph is similar to one used in the Draft EIS in conjunction with Table 3.4-8 (pg. 3-34). If used in conjunction with Table 3.4.9, the text should be revised.

We have consulted with Garvin Heath, PhD, one of the NREL scientists that worked on the IPCC document. He can provide additional input if needed (garvin.heath@nrel.gov<mailto:garvin.heath@nrel.gov>; 303-384-7460).

Informally, we suggest the following revisions to the proposed text in Section 3.4.2.1.2.5:

GHG emissions outlined in Table 3.4.9 account for basic transportation, storage, and processing but do not account for additional increases associated with from transportation to and from Hawaii. , storage, and processing or other indirect sources of GHGs, and as such may be higher than those shown. The

IPCC Special Report on Renewable Energy Sources and Climate Change indicates that lifecycle GHG emissions from all first- and next-generation biofuels have lower lifecycle GHG emissions compared to fossil fuels (IPCC 2012). Table 3.4-9 shows overall ranges of lifecycle GHG emissions from biofuels, natural gas, and oil/diesel. The median lifecycle GHG emissions of all biofuels are between 432 450 and 964 nearly 1000 grams CO2e/kWh lower than their fossil-fueled counterparts. The maximum lifecycle GHG emissions for any biopower scenario is 75 grams CO2e/kWh; whereas the minimum lifecycle GHG emissions for any fossil fuel scenario is 290 grams CO2 e/kWh. Therefore, regardless of the exact source of and type of biofuel ultimately used, the total lifecycle GHG emissions would be no more than 26 percent of those generated by fossil fuels for the same amount of electricity. The use of biofuels under the Proposed Action would likely have a net benefit to the environment when compared to using fossil fuels under the No Action Alternative. This is representative of all biofuels and all biopower processing and transportation scenarios. These effects would be moderately beneficial.

Table 3.4-9 Lifecycle GHG Emissions from Biofuels and Fossil Fuels

Values	Lifecycle GHG Emissions (grams CO2eq/kWh)			
	Biofuels	Natural gas	Oil/Diesel Fuel	Coal
Minimum	-633	290	510	675
50th %	18 37	469	840	1001
Maximum	75 360	930	1170	1689

Source IPCC 2012
Negative estimates for biopower are based on assumptions about avoided emissions from residues and wastes in landfill disposals and co-products.

We appreciate the opportunity to provide further feedback. Please contact me if you have any additional questions or would like to discuss this further.

Regards,

Ann McPherson

Ann McPherson
Environmental Scientist
U.S. EPA Region 9
Environmental Review Section, ENF-4-2
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F004

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER TO:
(ER 15/0261)

Filed Electronically

June 8, 2015

Ms. Lisa Graham
NEPA Program Manager-IMHW-PWE
Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
947 Wright Avenue, Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Subject: Draft Environmental Impact Statement (DEIS) for the Lease of Army Land at Schofield Barracks for the Construction and Operation of a Biofuel-Capable Power Generation Unit, Oahu, Hawaii

Dear Ms. Graham,

F004a

The Department of the Interior (Department) has reviewed the U.S. Department of the Army (Army) Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station (SGS) Project. The Department provides the following comments concerning the DEIS with the intent of supporting secure and reliable power generation to meet the needs of the Army and Honolulu County in a way that will avoid or minimize adverse impacts to soil, water, and wildlife resources.

This letter has been prepared under the authority of and in accordance with the provisions of the National Environmental Policy Act of 1969 [42 U.S.C. 4321 et seq.; 83 Stat. 401], as amended (NEPA); the National Invasive Species Act of 1996 [P.L. 104-332], as amended (NISA); the Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661 et seq.; 48 Stat. 401) as amended (FWCA), the Endangered Species Act of 1973, [16 U.S.C. 1531 et seq.; 87 Stat. 884], as

amended (ESA); and other authorities mandating the Department's concern for environmental values.

General Comments

The Department's U.S. Fish and Wildlife Service (USFWS) participated in early coordination concerning the SGS project design prior to DEIS completion. The USFWS provided technical assistance to the Hawaiian Electric Company (HECO) regarding potential impacts of fuel emissions from the proposed SGS project, in a letter dated March 12, 2013 (2013-TA-0127). On November 6, 2014 the USFWS met with Army and HECO representatives to discuss the proposed SGS project design and ways to modify the action to reduce or remove adverse effects to listed species or critical habitats (2015-I-0113). The USFWS recommendations have been incorporated into the proposed project design to avoid impacts to listed species and are described in DEIS section 3.9.2 (pages 3-78 – 3-81).

The following section-specific comments are focused on those issues raised by the USFWS during review of the DEIS that were not addressed during the early coordination period.

F004b

Section 3.4.1 Impacts to Air Quality and Controls for Monitoring Air Quality Not Clearly Described

The USFWS March 2013 letter recommended that the Army or HECO clearly demonstrate how the proposed project will meet federal and state ambient air quality standards. According to the DEIS, because HECO would own and operate the SGS facility, it was determined that HECO would be the applicant for air quality compliance permits, and although the proposed facility is located on the Army's Schofield Barracks Military Reservation, the SGS facility would not be added to the Army's installation-wide Hawaii Department of Health Covered Source Permit (CSP) (page 3-25).

The CSP is an important mechanism to monitor and limit the amount of air pollutants from significant emission sources, depending on the source type (e.g., restricting operating hours, fuel type, throughput amount, and emission rates). As part of the Army's CSP permit, the installation is required to submit a comprehensive emissions statement annually.

The Department recommends including the proposed SGS facility emissions within the Army's CSP permit, issued in 2007 and currently being renewed (DEIS, page 3-24), rather than segmenting the proposed SGS facility. According to Table 3.4-7 (DEIS, page 3-33), the proposed SGS facility is expected to exceed eight of the 22 Prevention of Significant Deterioration (PSD) Pollutant Thresholds, including thresholds for nitrogen oxide, total particulate matter, benzene, and arsenic. According to the DEIS (page 3-34), HECO submitted a PSD/CSP Application No. 0793-01 for the proposed SGS project, however it is unclear on the status of review or public comment.

Long-term moderate adverse direct effects on air quality are expected from the direct emissions of criteria pollutants, hazardous air pollutants (HAPs) and greenhouse gases (GHGs) from the proposed project (DEIS, page 3-30). These effects are not considered to be significant, due to

the assumed reduction in the use of older power generating stations (page 3-34), however the DEIS does not provide a clear timeframe or information on demonstrating this reduction in emissions or reduction in use of other older power generating stations.

The SGS would burn biofuels, diesel, biofuels/diesel blends, and liquefied natural gas (LNG), if and when LNG becomes available on the island (DEIS, page 2-11). Due to the unavailability of LNG at this time, it is expected that the SGS would operate on 100% biodiesel or 50% biodiesel/50% diesel blend. According to Table 3.4-5, both of these scenarios would result in "Highest levels" of criteria pollutants and any biodiesel blend would result in "Highest levels" of greenhouse gas emissions. Based on the assumed but undescribed reduction in the use of other older power generating stations, there are no mitigation measures for air quality or controls to specifically limit emissions.

F004c

Section 3.7.1 Impacts to Surface Water Quality and Controls for Stormwater Runoff Not Clearly Described

The Waikele Stream is located less than 150 feet northeast of the proposed SGS project site, and is a major feature of the Waikele watershed. The proposed SGS project parcel is undeveloped and relatively flat with stormwater from the parcel expected to flow into the Waikele Stream (DEIS, page 3-61). The Waikele Stream is listed on Hawaii's 303(d) list, pursuant to the Clean Water Act, for nutrients and turbidity. The Total Maximum Daily Load (TMDL) process has not been completed for Waikele Stream (DEIS, page 3-59). It is expected that the TMDL for Waikele Stream will identify sources of pollution within the watershed and determine pollutant load reductions required for the stream to meet water quality standards. The Department requests that this information be provided in the Final EIS.

The Hawaii Department of Health assures the implementation of approved TMDL wasteload allocations through the enforcement of National Pollutant Discharge Elimination System (NPDES) permit conditions. According to the DEIS the Army operates under existing NPDES permit number HI S000090, covering all U.S. military installations on the island of Oahu (page 3-60). However, it is unclear if the proposed SGS facility will be included under the Army's NPDES permit.

According to the DEIS, a NPDES General Permit would be obtained Authorizing Discharges of Stormwater Associated with a Construction Activity; however the applicant for such permit is not identified. In addition, the NPDES General Permit requires a project-specific Stormwater Pollution Prevention Plan (SWPPP); however the SWPPP has not been completed (DEIS, page 3-62). The preparation and implementation of an SWPPP would ensure that spills would be minimized and promptly contained and cleaned up if they occurred.

Due to the proposed project's proximity to the Waikele Stream, the Department is concerned with the storage and treatment of wastewater and hazardous materials. According to the DEIS, if all six engines are operating at full power, the selective catalytic reduction (SCR) equipment to reduce harmful emissions will require approximately 372 gallons per hour of urea solution, made on-site by mixing dry urea pellets and potable water (DEIS, page 2-12). Urea is a chemical compound with high nitrogen content and if released into nearby streams, there is a potential for

this compound to accelerate algae blooms and severely limit available oxygen for aquatic organisms, leading to "dead zones" of various fish species (Bisson et al. 1992).

The DEIS section 2.2.1., provides an overview of the waste management proposed for the power plant, specifically that the urea storage and delivery area would have spill containment. The proposed site is also approximately two miles from the Honouliuli Forest Reserve, home to 39 threatened and endangered species, 16 of which are found nowhere else in the world. Based on the various chemicals and hazardous materials that would be stored and generated by the facility, spill containment, reporting, and proper waste management protocols are critical in ensuring no harmful effects to wildlife resources.

F004d

The Department has also reviewed the Army's Water Characterization Study (DEIS, Appendix E), detailing options for the stormwater retention basin configurations. The Department is in agreement with recommendations in Appendix E; specifically we support the option that reduces or limits the ponding depth to a maximum of two feet, and instead increases the footprint of the basin (page 15, line 9). Increasing the footprint of the basin to a maximum of 0.18 acre will increase the area available for infiltration, and reduce the amount of standing water available.

The endangered Hawaiian stilt or ae'o (*Himantopus mexicanus knudseni*), Hawaiian coot or 'alae ke'oke'o (*Fulica alai*), Hawaiian moorhen or 'alae 'ula (*Gallinula chloropus* **sandvicensis),** Hawaiian duck or koloa maoli (***Anas wyvilliana***), and the Hawaiian goose or nēnē (***Branta sandvicensis***), collectively referred to as "Hawaiian Water birds," are found in the region and are attracted to standing water and emergent vegetation. Ponding of water within the detention basin is expected after storm events; however, through proper maintenance as described in Appendix E, any standing water would be temporary. The Army has also agreed to install netting, floating bird deterrent balls, or an equivalent system to prevent Hawaiian Water birds from nesting at the power plant facility detention basin (DEIS, page 3-81).

The Department recognizes the efforts of the Army to conserve and protect endangered and threatened wildlife and the nation's soil and water resources. The Department appreciates the opportunity to work with the Army at the national, state and local levels to support Army energy initiatives in a way that avoids or minimizes adverse impacts to fish and wildlife resources. Please contact Deborah Giglio-Willoughby at (916) 414-6600 or at deborah_giglio@fws.gov, if you have any questions or need additional information regarding these comments.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: OEPC-Staff Contact: Shawn Alam, 202-208-5465; shawn_alam@ios.doi.gov
FWS Contact: Deborah Giglio-Willoughby at (916) 414-6600: deborah_giglio@fws.gov

August 6, 2015

Ms. Patricia Sanderson Port
Regional Environmental Officer
Pacific Southwest Region
Office of Environmental Policy and Compliance
U.S. Department of the Interior
333 Bush Street, Suite 515
San Francisco, CA 94104

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Port:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number F004 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from F004b to F004d (F004a is the introduction provided in your letter). Your letter, with the annotations included, is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

F004b. The air permit program in Hawai'i has been approved by the U.S. Environmental Protection Agency (EPA) and delegated to the state of Hawai'i Department of Health. Hawai'i Revised Statutes Chapter 342B sets forth the requirements for covered source permits in the state. Under section 342B-22(a), "[t]he owner or operator of a covered source shall obtain a permit from the department."

Hawaiian Electric would obtain a Covered Source Permit (CSP) operating permit for the SGSP, which would require both monitoring of emissions and annual emissions statements similar to the CSP for Schofield Barracks. Hawaiian Electric's Prevention of Significant Deterioration & Covered Source Permit (PSD/CSP) application no. 0793-01 for the proposed SGSP has been submitted and is currently under review. It was determined through coordination with both the Hawai'i Department of Health and EPA that, although the proposed facility is located on the installation, Hawaiian Electric would be the proper applicant and permittee of the CSP as Hawaiian Electric would be a tenant that independently owns and operates the facility.

Any electricity produced by the proposed SGSP would reduce the need for other facilities to provide power. This would occur on a one-for-one basis after the facility was in operation. Emission factors used to calculate the indirect reductions shown in Table 3.4-9 (formerly Table 3.4-8) came directly from EPA's *eGRID2012 Version 1.0 Year 2010 Summary Tables—Island of Oahu*. This accounts for the current composite energy production on the island of O'ahu.

Engineering controls for air emission are described in sections 2.2.1.10 and 3.4.2.1.2.1 of the EIS. Section 3.4.2.1.3 outlines mitigation measures and best management practices for air quality.

F004c. Regarding Waikele Stream, draft EIS section 3.7.1.2 states that the stream is on Hawai'i's 303(d) list and that the TMDL process is underway. To fully reflect the information you are requesting be provided in the final EIS, the following sentence has been added to section 3.7.1.2: "It is expected that the TMDL for Waikele Stream will identify sources of pollution within the watershed and determine pollutant load reductions required for the stream to meet water quality standards." Current information on the Hawai'i Department of Health website (health.hawaii.gov/cwb) indicates that the TMDL for Waikele Stream has not been finalized. Any updated information that is available before the final EIS is published will be incorporated into the document.

Regarding NPDES permit coverage, Hawaiian Electric will obtain a separate NPDES permit for construction of the SGSP rather than being covered by the Army's NPDES permit. DOI is correct that the NPDES application has not yet been submitted; however, Hawaiian Electric would apply for and obtain this permit prior to beginning construction activities.

In addition, as stated in draft EIS section 3.7.2.1.1, a project-specific stormwater pollution prevention plan will be completed when the construction plan and design are finalized and prior to construction and operation of the SGSP. As stated in draft EIS section 3.7.1.2, operation of the SGSP will be covered by the Army's existing MS4 permit.

The Army and Hawaiian Electric share DOI's concern that stormwater, wastewater and hazardous materials be managed to minimize the potential for spills occurring or for nearby water bodies being contaminated. Spill prevention, containment, and response are discussed in draft EIS sections 2.2, 3.7 and 3.11, among others. Among the measures indicated are (1) providing sufficient spill containment for urea, fuel and other potentially hazardous materials; (2) creating a project-specific stormwater pollution prevention plan, hazardous materials management plan and spill prevention, control, and countermeasures plan; (3) designing the site so that runoff is fully contained and can be retained as necessary and potentially contaminated runoff is directed through appropriate sumps and an oil/water separator; (4) implementing proper waste management protocols in accordance with regulatory requirements; and (5) properly reporting all spills and other information required by law. The Army and Hawaiian Electric understand the ecological and water quality implications of releases of harmful substances into the environment at the proposed location and will take appropriate measures to ensure that Hawai'i's environment is protected.

The Honouliuli Forest Reserve is approximately 2 miles west of the SGSP and at a higher elevation, so it could not be affected by potential spills of chemicals of hazardous materials from the SGSP. Potential effects to biological resources are discussed in draft EIS section 3.9.

F004d. The Army and Hawaiian Electric appreciate the concern and information provided about Hawaiian water birds. Final design of the stormwater retention basin has not been determined. The information you have provided will be taken into consideration in determining the final design.

As stated in section 3.9 of the draft EIS, the Army informally consulted with the U.S. Fish and Wildlife Service (USFWS) under section 7 of the Endangered Species Act, providing USFWS with a letter documenting the Army's conclusion that, with implementation of the design measures presented in the draft EIS, effects on threatened and endangered species would be less than significant. USFWS concurred with the Army's assessment in a letter dated January 29, 2015. The design measures agreed upon by the Army and USFWS are presented in section 3.9 of the draft EIS.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S001

DAVID Y. IGE
GOVERNOR OF HAWAII

VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:

04023PGH.15

April 22, 2015

ATTN: IMHW-PWE (L. Graham)
Directorate of Public Works
U.S. Army Garrison Hawaii
Department of the Army
947 Wright Avenue, Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

To Whom It May Concern: S001a

SUBJECT: Comments on the Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated April 15, 2015, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please S001b note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf

S001c

1. Any project and its potential impacts to State waters must meet the following criteria:

   a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.

   b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.

   c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

S001d

2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee ($1,000 for an individual NPDES permit or $500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: https://eha-cloud.doh.hawaii.gov/epermit/. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

S001e

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

   Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

S001f

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation.

S001g

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

   a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological

bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

S001h

b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.

S001i

c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.

S001j

d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.

S001k

e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

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

Sincerely,

Alec Wong

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

GH:ay

August 6, 2015

Mr. Alec Wong, P.E.
Chief
Clean Water Branch
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, HI 96801-3378

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Wong:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number S001 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from S001b to S001k (S001a is the introduction provided in your letter). Your letter, with the annotations included, is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

S001b. The project proponent has reviewed the standard comments and confirmed that they are addressed in section 3.7 of the EIS.

S001c. The potential impact to state waters from the project would arise from construction stormwater runoff and post-construction stormwater runoff. Both of these sources would be controlled in compliance with regulatory requirements and would be permitted by the Hawai'i Department of Health and other regulatory bodies as required.

S001d. As stated in section 3.7.2.1.1 of the EIS:

> "Permit coverage for stormwater runoff from the construction site would be obtained under the NPDES General Permit Authorizing Discharges of Stormwater Associated with Construction Activity (HAR Chapter 11-55 Appendix C; expires December 5, 2018) issued by the Department of Health, Clean Water Branch."

Hawaiian Electric will follow the regulatory process for obtaining NPDES permit coverage. Hawaiian Electric also will comply with NPDES permit number HI S000090, the Army's small municipal separate storm sewer system (MS4) permit.

S001e. Hawaiian Electric or its contractor will obtain any required permits and authorizations—including a section 401 WQC if required—before commencing work on the facility.

S001f. The requirement to comply with state water quality standards is acknowledged. Hawaiian Electric or its contractor will take all steps necessary to ensure the protection of state waters during facility construction and facility operation. Preparing and implementing a stormwater pollution prevention plan for the control of construction stormwater runoff and incorporating best management practices (BMPs) into facility design to control stormwater runoff once the facility is operational in accordance with regulatory requirements would ensure full protection of potentially affected state waters.

S001g. The Army and Hawaiian Electric recognize stormwater as part of the water cycle and a community asset, and have integrated it into the project planning and permitting process. This is demonstrated by the discussion of stormwater in section 3.7 of the EIS, which addresses stormwater planning, design and permitting and low impact development for construction and operation of the project.

S001h. The project will be designed to minimize water use, and potable water use at the facility will have little-to-no impact on surface water quality or natural resources conservation. Water will primarily be required to make the urea solution needed for the SCR emissions control system, with other minor water uses. Approximately 340 gallons per hour of potable water will be required to generate the maximum anticipated flow rate of 372 gallons of 40 percent urea solution. This translates to 8,160 gallons per day for the facility. A DLNR permit allocates a 12-month moving average of 5.65 million gallons per day to the Army from the ground water aquifer. Potable water use for the SGSP would account for ~1/7 of 1 percent of its permitted withdrawal capacity. Uncontaminated stormwater will be collected in a retention basin and returned to the environment through infiltration and evaporation.

S001i. The Army and Hawaiian Electric will consider stormwater BMPs related to system design. As stated in section 3.7.2.1.3 of the EIS, "the final selection of stormwater BMPs and the design of the stormwater system would be determined as the project design is finalized."

S001j. The Army and Hawaiian Electric will consider the use of green building practices and have already incorporated some such practices into the project design. For example, as stated in section 3.9.2.1.2.1 of the EIS:

> "Any plantings would comply with USAG-HI Policy 63, Landscaping with Native Plants (Department of the Army 2014) … The landscaping would be maintained manually (e.g., mowing, trimming, and weeding) and the use of pesticides or herbicides is not anticipated."

Also, stormwater runoff will be contained on-site and ultimately discharged from an infiltration basin sized to eliminate any impact on Waikele Stream or its watershed. Stormwater runoff from the diesel tanks and lubricating oil equipment areas at the SGSP will be routed into water collection sumps. The sumps will routinely be checked for contamination from the equipment and occasionally be pumped through an on-site oil/water separator system. Primary potential contaminants include fuel and oil from the biodiesel engines and their accompanying equipment. Noncontaminated water will be subjected to stormwater management. Trucks will transport any contaminated stormwater for off-site treatment at an appropriate wastewater disposal facility (Hawaiian Electric 2014c).

S001k. No stormwater infrastructure exists at the site so retrofitting stormwater infrastructure is not applicable to the project.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S002

DAVID Y. IGE
GOVERNOR
STATE OF HAWAII

SHAN S. TSUTSUI
LT. GOVERNOR
STATE OF HAWAII

JOBIE M. K. MASAGATANI
CHAIRMAN
HAWAIIAN HOMES COMMISSION

WILLIAM J. AILA, JR.
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

P. O. BOX 1879
HONOLULU, HAWAII 96805

May 5, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
Attn: IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Subject: Draft Environmental Impact Statement for
The Schofield Generating Station Project,
U.S. Army Garrison, Hawaii

Dear Mr. Graham:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii.

The Department of Hawaiian Home Lands has no comment to offer at this time.

If you have any questions, please contact our Planning Office at (808) 620-9481.

Aloha,

Marvin Kaleo Manuel,
Acting Planning Program Manager

August 6, 2015

Mr. Marvin Kaleo Manuel
Acting Planning Program Manager
Department of Hawaiian Homelands
State of Hawai'i
P.O. Box 1879
Honolulu, HI 96805

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Manuel:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Department of Hawaiian Homelands has no comments at this time. Your letter has been assigned identification number S002 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

MAY - 5 2015

Department of the Army
Directorate of Public Works
U. S. Army Garrison, Hawaii
Attn: IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

To Whom it May Concern:

Subject: Draft Environmental Impact Statement (DEIS) for
Schofield Generating Station Project, U.S. Army Garrison, Hawaii

Thank you for the opportunity to comment on the subject project. The proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities, and, we have no comments to offer at this time.

If you have any questions, your staff may call Ms. Gayle Takasaki of the Planning Branch at 586-0584.

Sincerely,

JAMES K.KURATA
Public Works Administrator

GT:mo

August 6, 2015

Mr. James K. Kurata
Public Works Administrator
Department of Accounting and General Services
State of Hawai'i
P.O. Box 1879
Honolulu, HI 96805

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Kurata:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Department of Accounting and General Services has no comments at this time. Your letter has been assigned identification number S003 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S004

DAVID Y. IGE
GOVERNOR OF HAWAII

VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

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

In reply, please refer to:
File:
EPO 15-090

May 12, 2015

Tetra Tech, Inc.
Attn: Kristin Shields
1999 Harrison Street, Suite 500
Oakland, CA 94612

Dear Kristin Shields:

SUBJECT: DEIS Schofield Generating Station Project

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges notification of your DEIS to the Department of Health by the U.S. Department of the Army, via letter dated April 15, 2015 and notification of Public Meetings. Thank you for allowing us to review and comment on the proposed project. The proposed project was routed electronically via the OEQC website link: http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/2010s/2015-04-23-OA-5E-DEIS-Schofield-Generating-Station.pdf

The DEIS was routed electronically to various branches and offices. The various branches will provide specific comments to you if necessary. EPO recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: http://health.hawaii.gov/epo/home/landuse-planning-review-program Projects are required to adhere to all applicable standard comments.

We encourage you to examine and utilize the Hawaii Environmental Health Portal. The portal 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. The Portal is continually updated. Please visit it regularly at: https://eha-cloud.doh.hawaii.gov

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,

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

c: Hawaii State Department of Land and Natural Resources
Hawaiian Electric Company
U.S. Department of the Army (Pacific Command), Army Garrison Hawaii
HDOH: DDEH, CAB, CWB, IRHB, & HEER {via email only}
U.S. EPA PICO & U.S. EPA Region IX

August 6, 2015

Ms. Laura Leialoha Phillips McIntyre, AICP
Program Manager
Environmental Planning Office
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, HI 96801-3378

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. McIntyre:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

The Army and Hawaiian Electric have reviewed the referenced standard comments provided in your letter and will adhere to those that are applicable to the SGSP project. Thank you also for the reference to the Environmental Health Portal, which we will use. The Army and Hawaiian Electric share EPO's commitment to sustainable design.

Your letter has been assigned identification number S004 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources

Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S005

OFFICE OF PLANNING
STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
ACTING DIRECTOR
OFFICE OF PLANNING

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: http://planning.hawaii.gov/

Ref. No. P-14762

May 28, 2015

Ms. Lisa Graham
Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013
Attn: IMHW-PWE

Dear Ms. Graham:

S005a

Subject: Draft Environmental Impact Statement for Schofield Generating Station Project, U.S. Army Garrison, Hawaii

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (Draft EIS) for the Schofield Generating Station Project (SGSP), U.S. Army Garrison, Hawaii (USAG-HI), which was transmitted to our office by letter dated April 23, 2015.

It is our understanding that the USAG-HI proposes to lease 8.13 acres of land and the related granting of a 2.5 acre interconnection easement on Schofield Barracks and Wheeler Airfield to Hawaiian Electric Company (HECO) to construct, operate, and maintain a 50 MW capacity energy power plant that includes power poles, high-tension power lines, and related equipment.

The primary purpose for the construction of the SGSP is to provide improved energy security to the USAG-HI at Schofield Barracks, Wheeler Army Airfield, and Field Station Kunia; and provide new secure, firm, dispatchable, flexible, and renewable energy generation to the grid on the island of Oahu.

The Office of Planning (OP) has reviewed the Draft EA, and has the following comments to offer:

S005b

1. The Draft EIS adequately addresses Hawaii Revised Statutes (HRS) Chapter 226, Hawaii State Plan, and HRS § 205A-2, Coastal Zone Management Act objectives and policies;

2. The Draft EIS, Section 4.4.1, page 4-7, includes an analysis on the Hawaii State Plan's objectives and policies. These include: HRS § 226-18(a) and (b) – (Facilities Systems - Energy). S005c

3. HRS § 226-108(2) – priority guideline on sustainability, encourages planning that respects and promotes living within the natural resources and limits of the State. The Draft EIS, Section 4.4.2, page 4-9, includes an analysis of the State Sustainability Plan 2050. The Draft EIS states the SGSP generating units would be capable of using several types of fuels, including locally-produced bio-fuels. S005d

   Because this is an energy generation project, the Draft EIS would benefit by detailing the methods by which the SGSP intends to use, in order to promote energy efficiency and renewable energy generation. The Hawaii State Plan analysis in Section 4.4.1, should be amended and include an examination on the proposed project's ability to meet the goals of energy resource conservation principles.

4. The Draft EIS, Section 5.2.7, page 5-5, includes an analysis on water resources. It identifies the need for a National Pollution Discharge Elimination System permit during the construction phase. The project will also implement a Stormwater Pollution Prevention Plan to limit post-development discharge of stormwater from a 10-year event to the pre-development rate. To ensure the project will have only minor effects on water resources, please investigate the feasibility of reducing the amount of impervious and hardened surfaces surrounding the SGSP during the design phase of this project. During heavy storms, hardened surfaces allow storm runoff to flow into storm-drains and overwhelm nearby coastal areas with sediment and land-based pollutants. To prevent the discharging of untreated runoff directly to nearshore waters, please consider Low-Impact Development (LID) design standards and Best-Management-Practices (BMP) to control stormwater runoff. LID techniques promote a range of structural BMP's for stormwater mitigation that minimizes the negative effect on the marine environment. S005e

   LID design concepts and stormwater runoff BMP's embrace decentralized micro-scale controls that infiltrate, filter, store, reuse, evaporate, and detain runoff close to its source. Examples of effective BMP and LID stormwater control methods are listed in OP's Low Impact Development, A Practitioners Guide. For more information on this, please examine Section 3.4, pgs. 3-14 to 3-17 of this guide. It can be viewed or downloaded from the OP website at:
   http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf

If you have any questions regarding this comment letter, please contact Josh Hekekia of our office at 587-2845.

Sincerely,

Leo R. Asuncion
Acting Director

August 6, 2015

Mr. Leo R. Asuncion
Acting Director
Office of Planning
State of Hawai'i
P.O. Box 2359
Honolulu, HI 96804

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Asuncion:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) [Chapter 343, Hawai'i Revised Statutes (HRS)] and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number S005 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from S005b to S005e (S005a is the introductory text). Your coded letter is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

S005b. The comment that the draft EIS adequately addresses HRS Chapter 226, Hawai'i State Plan, and HRS § 205A-2, Coastal Zone Management Act objectives and policies is noted.

S005c. The comment that the draft EIS, section 4.4.1, page 4-7, includes an analysis on the Hawai'i State Plan's objectives and policies is noted.

S005d. The following text has been added to the end of section 4.4.1 Hawai'i State Plan:

> *"§226-108 Priority guidelines and principles to promote sustainability shall include:*
> *(2) Encouraging planning that respects and promotes living within the natural resources and limits of the State;*

The SGSP's requirement to use biofuels would provide a steady commercial biofuel demand that could encourage investment in local biofuel production capacity. In addition, the high fuel efficiency of the proposed engines compared to existing generating facilities would mean that

when the SGSP is placed in service, less total fuel would be required to meet State energy demands. Combined, these two aspects demonstrate that the SGSP supports the goal of living within the natural resource limits of the State."

S005e. The facility design will minimize impervious area to the greatest extent feasible. Impervious areas will include the facility itself and structures such as storage tanks, parking, and access roads. Low impact development was investigated as a stormwater control option, but an infiltration basin was selected as a more feasible alternative. Untreated runoff will not discharge directly to surface waters or to nearshore waters.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S006

DAVID Y. IGE
GOVERNOR OF HAWAII

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 21, 2015

MEMORANDUM

FROM ~~TO~~:

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

TO ~~FROM~~: Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii
LOCATION: See Figure 3.1-1 and Table 3.1-1
APPLICANT: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Transmitted for your review and comments on the above-referenced documents. We would appreciate your comments on these documents which can be viewed online at www.garrison.hawaii.army.mil/schofieldplant.

Please submit any comments by June 3, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: _____
Print Name: _____
Date: 4/23/2015

August 6, 2015

Mr. Timmy Chee
Land Division–O'ahu District
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Chee:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that your department has no objections at this time. Your letter has been assigned identification number S006 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S007

DAVID Y. IGE
GOVERNOR OF HAWAII

CARTY S. CHANG
INTERIM CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 21, 2015

MEMORANDUM

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

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii
LOCATION: See Figure 3.1-1 and Table 3.1-1
APPLICANT: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Transmitted for your review and comments on the above-referenced documents. We would appreciate your comments on these documents which can be viewed online at www.garrison.hawaii.army.mil/schofieldplant.

Please submit any comments by June 3, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: [signature]
Print Name LISA HADWAY
Date: 4/24/15

August 6, 2015

Ms. Lisa Hadway
Division of Forestry and Wildlife
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Hadway:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that your department has no comments at this time. Your letter has been assigned identification number S007 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

April 21, 2015

MEMORANDUM

APR 28 2015

~~TO:~~ FROM:

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

RECEIVED
LAND DIVISION
2015 APR 28 PM 2:57
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

TO:
~~FROM:~~ Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii
LOCATION: See Figure 3.1-1 and Table 3.1-1
APPLICANT: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Transmitted for your review and comments on the above-referenced documents. We would appreciate your comments on these documents which can be viewed online at www.garrison.hawaii.army.mil/schofieldplant.

Please submit any comments by June 3, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: [signature]
Print Name: ALEX J. ROY
Date: 4/28/15

PLEASE SEND COPIES OF ALL COMMENTS TO THE OCCL. THE OCCL IS THE "APPROVING AGENCY" REP. FOR DLNR

August 6, 2015

Mr. Alex J. Roy
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Roy:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that your department has no objections at this time. Per your request, a consolidated copy of all comments received on the draft EIS was emailed to you on July 13, 2015.

Your letter has been assigned identification number S008 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S009

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

DAR # 5105

April 21, 2015

MEMORANDUM

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

JKV
AT
BKK

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii
LOCATION: See Figure 3.1-1 and Table 3.1-1
APPLICANT: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Transmitted for your review and comments on the above-referenced documents. We would appreciate your comments on these documents which can be viewed online at www.garrison.hawaii.army.mil/schofieldplant.

Please submit any comments by June 3, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: Alton Miyasaka
Print Name: Alton Miyasaka
Date: 5-19-15

DAVID Y. IGE
GOVERNOR OF HAWAII

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

KEKOA KALUHIWA
FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813
Telephone: 587-0100

Date: May 19, 2015
DAR # 5105

MEMORANDUM

TO: Alton Miyasaka, Acting Adminstrator 5-19-15
DATE: May 19, 2015
FROM: Annette Tagawa, Aquatic Biologist AT
SUBJECT: Comments on Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii

Comment	Date Request	Receipt	Referral	Due Date
	Apr. 21, 2015	Apr. 23, 2015	Apr. 23, 2015	June 3, 2015

Requested by: Russell Y. Tsuji, Land Administrator

Summary of Proposed Project

Title: DEIS for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii

Project by: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Location: Wahiawa District, Island of Oahu, TMK(s): (1) 77001001, 002; (1) 73001001, 002, 006, 007, 008, 009, 011, 012, 013, 019, 022 & 024; 91) 76001001 & 006; (1) 94012001, 003 & 011

Brief Description: The applicant proposes the construction, ownership, operation and maintenance of a 50-megawatt (MW) biofuel-capable power generation plant (the Schofield Generating Station or SGS) and a sub-transmission line to connect the plant to the Hawaiian Electric Grid.

For Hawaiian Electric, the SGSP would provide a quick-starting facility to help maintain grid stability and compensate for increasing network penetration by variable power generation, such as wind and solar; provide a facility at a higher elevation and away from coastlines, which contributes to grid reliability and continuity if a natural disaster occurs; provide a physically secure facility on a military installation, contributing to grid continuity if a natural disaster occurs; provide a physically secure facility on a military installation, contributing to grid continuity of operation in cases of a manmade threat; and make progress towards the State Renewable Portfolio Standards.

For the Army the SGSP would provide energy security for its three installations if loss of service occurs from the normal sources of electricity supporting these installations. It would also help

achieve the Army goals of producing renewable energy on Army-owned real property and increasing installation use of electricity from renewable energy sources.

Comments: The Division has no objections to the proposed project since it is not expected to have significant adverse impact on aquatic resource values in this area. The Division is also in agreement with the Best Management Practices (BMPs) that have been suggested by the applicant. In addition to the listed BMPs, we request that the applicant should take mitigative measures during construction activities to prevent contaminants such as sediment, pollutants, petroleum products, and other debris from possibly entering the aquatic environment. We also suggest that site work be scheduled during periods of minimal rainfall and lands denuded of vegetation be replanted or covered as quickly as possible to control erosion.

Thank you for providing DAR the opportunity to review and comment on the proposed project.

August 6, 2015

Mr. Alton Miyasaka
Acting Administrator
Division of Aquatic Resources
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Miyasaka:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that your department has no objections, but has requested that Hawaiian Electric take mitigative measures during construction activities to prevent contaminants such as sediment, pollutants, petroleum products, and other debris from possibly entering the aquatic environment. You also suggest that site work be scheduled during periods of minimal rainfall and lands denuded of vegetation be replanted or covered as quickly as possible to control erosion.

As described in section 3.11.2.1.1 of the EIS, prior to the start of construction, Hawaiian Electric will prepare a site-specific hazardous materials management plan detailing relevant best management practices for construction activities, including proper chemical storage, spill prevention, and spill response.

Also, as stated in section 3.7.2.1.1, permit coverage for stormwater runoff from the construction site will be obtained under the NPDES General Permit Authorizing Discharges of Stormwater Associated with Construction Activity (Hawai'i Administrative Rules, Chapter 11-55 Appendix C; expires December 5, 2018) issued by the Department of Health, Clean Water Branch. The permit requires that a project-specific stormwater pollution prevention plan (SWPPP) be prepared. The SWPPP will identify potential sources of stormwater pollution at the construction site, describe stormwater control measures to reduce or eliminate pollutants in stormwater discharges from the construction site, and identify procedures the permittee will implement to comply with the terms and conditions of this general permit. Other provisions of the general permit include:

- Designing, installing, and maintaining erosion and sediment controls that minimize the discharge of pollutants from earth-disturbing activities.
- Minimizing the amount of soil exposed during construction.
- Completing installation of stormwater controls prior to earth-disturbance.
- Ensuring that all erosion and sediment controls remain in effective operating condition during permit coverage and are protected from activities that would reduce their effectiveness.
- Stabilizing exposed portions of the site.
- Designing, installing, and maintaining effective pollution prevention measures to prevent the discharge of pollutants, including measures to prevent pollution from equipment used on and activities performed at the construction site.

The best management practices in the hazardous materials management plan and SWPPP will minimize the potential for contaminants such as sediment, pollutants, petroleum products, and other debris from entering the aquatic environment and minimize erosion.

Your letter has been assigned identification number S009 and will be included, along with this response letter, in appendix A of the final EIS. We will provide a copy of the final EIS to you when it is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

April 21, 2015

MEMORANDUM

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

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii
LOCATION: See Figure 3.1-1 and Table 3.1-1
APPLICANT: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Transmitted for your review and comments on the above-referenced documents. We would appreciate your comments on these documents which can be viewed online at www.garrison.hawaii.army.mil/schofieldplant.

Please submit any comments by June 3, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: /s/ W. Roy Hardy
Print Name: Acting Deputy Director
Date: May 27, 2015

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

May 27, 2015

REF: RFD.4172.3

TO: Russell Tsuji, Administrator
Land Division

FROM: W. Roy Hardy, Acting Deputy Director
Commission on Water Resource Management

SUBJECT: DEIS for the Schofield Generating Station Project, U.S. Army Garrison

FILE NO.:
TMK NO.:

S010a

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

Our comments related to water resources are checked off below.

S010b

☒ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.

☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.

☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.

S010c

☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/.

S010d

☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initiative/lid.php.

S010e

☒ 6. We recommend the use of alternative water sources, wherever practicable.

☐ 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at http://energy.hawaii.gov/green-business-program

☐ 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf

☐ 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:
Additional information and forms are available at http://hawaii.gov/dlnr/cwrm/info_permits.htm.

☐ 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.

☐ 11. A Well Construction Permit(s) is (are) required before any well construction work begins.

☐ 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.

☐ 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.

☐ 14. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.

☐ 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.

☐ 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.

☐ 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.

☐ 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.

☒ OTHER: S010f
The report should provide an estimate of the total projected water demand for the proposed plant. The last paragaph under the discussion of potable water (Section 3.13.1.3 on page 3-122) describes the Pearl Harbor Aquifer Sector Area and its sustainable yield and allocation amounts. However, the wells that will provide the additional water needed to support the project are located in the Central Sector, which has a sustainable yield of 23 mgd, of which 22.978 mgd have been allocated.

If there are any questions, please contact Lenore Ohye of the Planning Branch at 587-0216.

August 6, 2015

Mr. W. Roy Hardy
Acting Deputy Director
Commission on Water Resource Management
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Hardy:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number S010 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from S010b to S010f (S010a is the introduction provided in your letter). Your letter, with the annotations included, is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

S010b. The Schofield Generating Station will connect directly to the Army's water systems, and will be permitted through the U.S. Army Garrison-Hawai'i Department of Public Works permitting process instead of the County Department of Permitting and Planning. Hawaiian Electric will coordinate with the Army to ensure that the Schofield Generating Station is incorporated into the garrison's water use and development plan.

S010c. Thank you for the suggestion. Hawaiian Electric does not intend for this facility to pursue LEED certification, but will investigate the benefits of water efficient fixtures.

S010d. Thank you for the suggestion. Hawaiian Electric does not intend for this facility to pursue LEED certification, but will consider stormwater management best management practices as discussed in section 3.7 of the EIS.

S010e. Hawaiian Electric has evaluated alternate water sources, such as the treated water available from the wastewater treatment facility at Wheeler Army Airfield. To date, alternate water sources have not demonstrated the ability to meet the project's requirements. The company will continue to evaluate water source options.

S010f. In section 3.13.1.3, Potable Water, the last paragraph has been replaced with the following text:
"Schofield Barracks' groundwater comes from the Schofield Shaft in the Central Sector of the Central Oahu Watershed (Dashiell 2007). The Army is the second largest federal potable water user in the Central Oahu Watershed (first being the Navy). The Army's total permitted use is 5.648 mgd from the Schofield Shaft. As of March 2015, the Army's actual usage was 3.159 mgd (Bogdanski 2015). The generating station would use approximately 1,100 gallons of water per day; however, even with this addition, the Army's water use would remain well below its permitted use, so effects would be minor."

The following reference was added to section 7 of the EIS:

Bogdanski, Liz, Environmental Compliance Branch Clean Air/Safe Drinking Water Program, Department of Public Works, U.S. Army Garrison-Hawai'i. 2015. Personal communication, June 30, 2015.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

April 21, 2015

MEMORANDUM

TO: FR:

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

TO:

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii
LOCATION: See Figure 3.1-1 and Table 3.1-1
APPLICANT: Hawaiian Electric Company by its consultant Tetra Tech, Inc.

Transmitted for your review and comments on the above-referenced documents. We would appreciate your comments on these documents which can be viewed online at www.garrison.hawaii.army.mil/schofieldplant.

Please submit any comments by June 3, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

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

Signed: _____
Print Name: Carty S. Chang, Chief Engineer
Date: 4/22/15

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji
REF: Intergovernmental Review of Federally-Funded Programs: Draft FYs 2016-2017 Overall Work Programs
Oahu.032

COMMENTS

( ) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone ___.

( ) Please take note that the project site according to the Flood Insurance Rate Map (FIRM), is located in Zone ___.

( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ___.

(X) Please note that the project(s) located in the Flood Hazard Zones (A, AO, AH, AE, AEF, V, VE, and XS) must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- **(X) Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.**
- ( ) Mr. Carter Romero (Acting) at (808) 961-8943 of the County of Hawaii, Department of Public Works.
- ( ) Ms. Carolyn Cortez at (808) 270-7253 of the County of Maui, Department of Planning.
- ( ) Mr. Stanford Iwamoto at (808) 241-4896 of the County of Kauai, Department of Public Works.

( ) The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.

( ) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

( ) Additional Comments: _____

_____

( ) Other: _____

_____

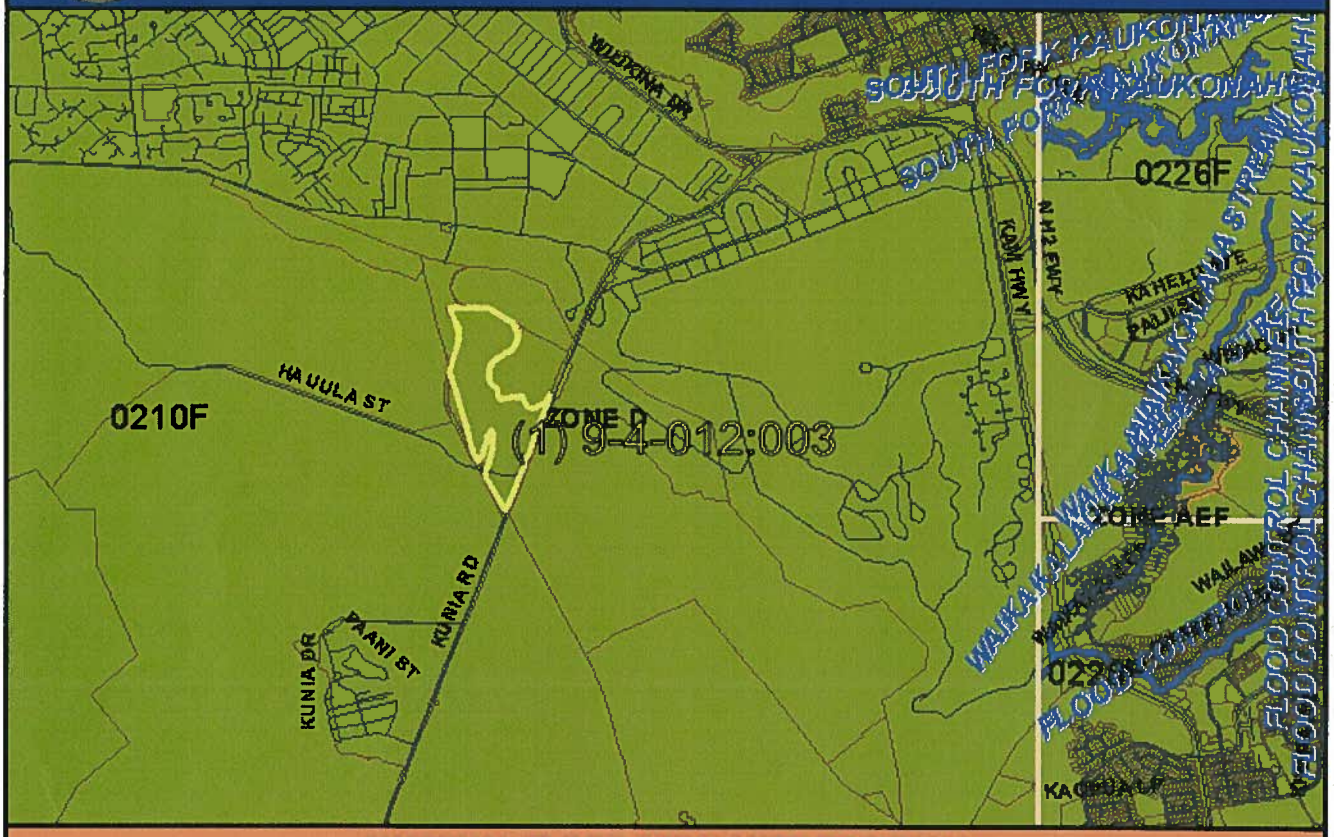
Should you have any questions, please call Mr. Dennis Imada of the Planning Branch at 587-0257.

Signed: _____
CARTY S. CHANG, CHIEF ENGINEER

Date: 6/5/15

State of Hawaii

FLOOD HAZARD ASSESSMENT REPORT



NATIONAL FLOOD INSURANCE PROGRAM

FLOOD ZONE DEFINITIONS

SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD – The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water-surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:

- **Zone A:** No BFE determined.
- **Zone AE:** BFE determined.
- **Zone AH:** Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
- **Zone AO:** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
- **Zone V:** Coastal flood zone with velocity hazard (wave action); no BFE determined.
- **Zone VE:** Coastal flood zone with velocity hazard (wave action); BFE determined.
- **Zone AEF:** Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE.

NON-SPECIAL FLOOD HAZARD AREA – An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

- **Zone XS (X shaded):** Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
- **Zone X:** Areas determined to be outside the 0.2% annual chance floodplain.

OTHER FLOOD AREAS

- **Zone D:** Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

PROPERTY INFORMATION

COUNTY:	HONOLULU
TMK NO:	(1) 9-4-012-003
PARCEL ADDRESS:	
FIRM INDEX DATE:	NOVEMBER 05, 2014
LETTER OF MAP CHANGE(S):	NONE
FEMA FIRM PANEL(S):	15003C0210F
PANEL EFFECTIVE DATE:	PANEL NOT PRINTED

PARCEL DATA FROM:	APRIL 2014
IMAGERY DATA FROM:	MAY 2006

IMPORTANT PHONE NUMBERS

County NFIP Coordinator	
City and County of Honolulu	
Mario Siu-Li, CFM	(808) 768-8098
State NFIP Coordinator	
Carol Tyau-Beam, P.E., CFM	(808) 587-0267

August 6, 2015

Mr. Carty S. Chang
Chief Engineer
Engineering Division
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Chang:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

The Army and Hawaiian Electric are aware of the requirements your letter identifies with regard to development in flood hazard areas. Although the transmission line will cross water bodies that are designated Federal Emergency Management Agency special flood hazard area zone AE, no construction will occur in those areas.

The last paragraph of section 3.7.1.1 in the EIS has been edited to clarify:

> "The generating station parcel and the interconnection easement and surrounding properties are not in a floodplain designated by the Federal Emergency Management Agency (Hawaii-NFIP 2013). The eastern portion of the interconnection easement, where poles 31-41 are proposed, crosses ~~lies in a~~ flood zone AE—areas subject to inundation by the 1 percent annual chance flood event—however, no construction is planned within the area designated flood zone AE. The remainder of the project area, including the generating station parcel, is in a flood zone D—unstudied areas where flood hazards are undetermined but flooding is possible."

In section 3.7.2.1.1, the text in blue has been added where indicated:

> "No adverse effects on the coastal zone would be expected from construction of the SGSP. A copy of agency coordination under CZMA is provided as Appendix D.
>
> Construction would not take place in designated flood hazard areas. No adverse effects with regards to flooding would be expected.
>
> No adverse effects on groundwater would be expected during construction."

Your letter has been assigned identification number S011 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S012

SHPD/LD

PHONE (808) 594-1888 FAX (808) 594-1938

STATE OF HAWAIʻI
OFFICE OF HAWAIIAN AFFAIRS
560 N. NIMITZ HWY., SUITE 200
HONOLULU, HAWAIʻI 96817

HRD15/5858C

June 2, 2015

Department of the Army
Directorate of Public Works, USAG-HI
ATTN: IMHW-PWE (L. Graham)
947 Wright Avenue, Wheeler Army Airfield
Schofield Barracks, HI 96857-5013

S012a

Re: Request for Comments for Draft Environmental Impact Statement for the Schofield Generating Station Project by the Department of the Army and the Hawaiian Electric Company
Waikele Ahupuaʻa, ʻEwa Moku, Oʻahu Mokupuni

Aloha Colonel Richard Fromm:

The Office of Hawaiian Affairs (OHA) is in receipt of your April 15, 2015 letter requesting comments on the draft environmental impact statement (DEIS) for the Schofield Generating Station Project. The project is a joint effort between the U.S. Army Garrison, Hawaiʻi (USAG-HI) and the Hawaiian Electric Company (HECO).

The proposed project entails the construction, operation, and maintenance of a 50-megawatt capacity renewable energy power plant and associated power poles, high-tension power lines, and related equipment and facilities. The power plant will be biofuel-capable and have a 46-kilovolt sub-transmission line that is required to connect the Schofield Generating Station to the HECO grid at the Wahiawā Substation. The State of Hawaiʻi Department of Land and Natural Resources has granted an easement to HECO, in order to lay the sub-transmission line across State of Hawaiʻi land and connect it to the Wahiawā Substation. HECO will be responsible for all operation and maintenance of the power plant.

The purpose of the project is two-fold: to provide improved energy security to the USAG-HI at Schofield Barracks, Wheeler Army Airfield, and Field Station Kunia; and to provide secure and renewable energy generation to the electric grid on Oʻahu.

S012b

OHA is aware that an archaeological inventory survey and a cultural impact assessment were completed in 2014, and that no historic sites were identified at the proposed project site. We also understand that your consultants have reached a conclusion that there is a low likelihood of archaeological and historical resources being impacted in the area of the proposed power plant, due to the previous use of the land for agricultural purposes and subsequent heavy use by the military as a right-of-way. Nevertheless, OHA does request assurances that should iwi kūpuna or Native Hawaiian cultural deposits be identified during any ground altering activities, all work will immediately cease and the appropriate agencies, including OHA, will be contacted pursuant to applicable law.

S012c

Finally, we note that the draft EIS does not adequately identify the project's construction funding source and the need for a new power generating plant. The project's primary purpose appears to be to provide energy security for the Schofield and Wheeler military installations, however, we understand that primary funding of the construction, maintenance, and operations of the plant will be borne by HECO and therefore its ratepayers. We seek confirmation as to this funding. We also understand that the electricity generated by the plant will be distributed to O'ahu HECO customers, which includes the two military installations, with the caveat that during an emergency situation, the two military installations would be powered first. This, however, does not justify the need for the building of a new power generating facility, in relation to current or expected energy demand in the area, and we therefore request this be addressed more fully in the final EIS. With the potential for roof-top solar at Schofield and Wheeler installations and the emphasis on renewable energy production in Hawai'i, as described in policy such as the Aloha+ Challenge, we would have liked to see the Army do more to support clean energy, rather than remaining tied to traditional power generating plants.

S012d

Mahalo for the opportunity to comment. Should you have any questions, please contact Jeannin Jeremiah at 594-1790 or by email at jeanninj@oha.org.

'O wau iho nō me ka 'oia 'i'o,

Kamana'opono M. Crabbe, Ph.D.
Ka Pouhana, Chief Executive Officer

KC:jj

C: Suzanne Case, Chairperson – State of Hawai'i Department of Land and Natural Resources

**Please address replies and similar, future correspondence to our agency:*

Dr. Kamana'opono Crabbe
Attn: OHA Compliance Enforcement
560 N. Nimitz Hwy, Ste. 200
Honolulu, HI 96817

August 6, 2015

Kamana'opono M. Crabbe, Ph.D.
Chief Executive Officer
Office of Hawaiian Affairs
State of Hawai'i
560 N. Nimitz Hwy., Suite 200
Honolulu, HI 96817

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Dr. Crabbe:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number S012 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from S012b to S012d (S012a is the introduction provided in your letter). Your letter, with the annotations included, is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

S012b. The following language has been added to the end of the last paragraph of section 3.10.2.1.1 of the EIS:

> "However, should iwi küpuna or Native Hawaiian cultural deposits be identified during any ground-altering activities, all work would immediately cease and the required agencies would be contacted pursuant to applicable law. In addition, the State of Hawaii Office of Hawaiian Affairs would be notified."

S012c. Providing energy security to the Army's facilities is one of the many purposes of the project. The other purposes, which benefit all Hawaiian Electric customers, are discussed in sections 1.3 and 1.4 of the EIS, and are further detailed in Hawaiian Electric's application to the Public Utilities Commission (PUC) in Docket 2014-0113.

The project will provide electrical power to all Hawaiian Electric customers during normal operations, which are expected to be the vast majority of the project's 30-year life. In the event of specific

contingencies, the project will have the capability to provide power directly to the Army's installations, thereby providing an energy security guarantee to the Army that will serve as in-kind consideration in lieu of lease rent payment for the life of the project. The Army also is contributing financially to the up-front development costs of the project.

Detailed analyses of the costs and benefits of this arrangement are provided in PUC Docket 2014-0113. The analyses show that this agreement is anticipated to save Hawaiian Electric's customers more than $12 million over the life of the project. Based on the merits of the project and the cost and benefits to the residents of O'ahu, Hawaiian Electric is seeking permission from the PUC to recover, via revenue from its customers, project costs that are not provided by the Army. This financing arrangement will be clarified in section 2.2.5 in the final version of the EIS.

S012d. Section 2.4 of the EIS discusses alternatives to the proposed action that were considered. None of the alternatives, including solar installations, would have met the objectives and requirements of the Army or Hawaiian Electric.

The planning criteria used by Hawaiian Electric to determine the need for new generating capacity on O'ahu are not based upon localized electrical demand, but rather on projected island-wide demand versus projected island-wide generation capacity, and the capabilities of the available generation facilities to provide specific energy services.

The need for the type of new renewable generation capacity that the project will provide is discussed in sections 1.4.3 and 1.4.4 of the EIS. Subsequent to the drafting of the EIS, the state's renewable portfolio standard (RPS) listed in section 1.4.3 increased, and the section has been revised in the final EIS to reflect the new, higher RPS. The state's updated goal of 100 percent renewable energy by 2045 is anticipated to strengthen the requirement to shift the existing generation portfolio on O'ahu to the type of new flexible generation that the SGSP will provide, which will enable the integration of more as-available renewable generation sources such as wind and solar. In addition, the achievement of the 100 percent renewable goal while maintaining system reliability will require that firm generating units be capable of using renewable biofuels, as the proposed SGSP will be.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

S013

UNIVERSITY of HAWAI'I SYSTEM

Office of Capital Improvements

June 8, 2015

Brian E. Peck
Chief, Military Planning and Environmental Compliance Branch
Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
ATTN: IMHW-PWE (L.Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

VIA: sgspcomments@tetratech.com

Dear Mr. Peck,

Subject: Draft Environmental Impact Statement
Schofield Generating Station Project
U.S. Army Garrison, Hawaii

Thank you for the opportunity to review and comment on your DEIS for the subject project.

The University of Hawai'i, Office of Capital Improvements has no comment.

Sincerely,

Maynard Young
Manager, Facilities Planning and Design

1960 East West Road, Biomedical Sciences B-102
Honolulu, Hawai'i 96822
Telephone: (808) 956-7935
Fax: (808) 956-3175

August 6, 2015

Mr. Maynard Young
Manager
Facilities Planning and Design
Office of Capital Improvements
University of Hawai'i
1960 East West Rd., Biomedical Sciences B-102
Honolulu, HI 96822

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Young:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Office of Capital Improvements has no comments at this time. Your letter has been assigned identification number S013 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

January 8, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
ATTN: IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Re: Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project (SGSP),

Dear Directorate of Public Works,

Please accept this letter as my official comments on the Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project (SGSP), U. S. Army Garrison, Hawaii, that envisions a lease of Army land and the State of Hawaii Department of Land and Natural Resources, (DLNR) granting of a 1.28-acre easement and a 0.7-acre conservation district authorization to the Hawaiian Electric Company, Inc. for the construction and operation of a 50-megawatt biofuel power generation plant and 46-kilovolt sub-transmission line.

I am writing in support of the project for the specific reasons set forth in the DEIS Executive Summary that states in relevant part:

"The needs of the Proposed Action are as follows:

- Increase energy security for the Army and Oahu,
- Assist the Army in compliance with renewable energy-related laws and Executive Orders and meeting its renewable energy goals,
- Assist Hawaiian Electric in meeting the Hawaii Renewable Portfolio Standard goals, and
- Improve future electrical generation on Oahu."

My further support arises from my understanding that Schofield Barracks, Wheeler Army Airfield, and Field Station Kunia require about 32 megawatts of peak power to meet all operational requirements and that the construction and operation of the SGSP would help insure that the Army can continue critical national security and first responder missions, particularly when the electrical grid on Oahu has been compromised by a natural or man-made disaster. I also lend my strong support to the project because of the ability of the SGSP to use locally produced bio-fuel as a fuel source.

In closing, it is for the reasons stated above that I submit these comments in support of the SGSP. Please contact my office should I be of any assistance with

Yours truly,

REPRESENTATIVE MARCUS R. OSHIRO
46th District (Wahaiwa, Whitmore Village, Launani Valley)

MRO:maal

August 6, 2015

The Honorable Marcus R. Oshiro
Representative District 46
State of Hawai'i
State Capitol, Rm. 424
Honolulu, HI 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Oshiro:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and appreciate your comments in support of the project. Your letter has been assigned identification number S014 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

DAVID Y. IGE
GOVERNOR OF HAWAII

COPY

VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

S015

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

In reply, please refer to:
File:

15-365A CAB

June 3, 2015

Ms. Suzanne Case
Chairperson
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 131
Honolulu, Hawaii 96813

Dear Ms. Case:

SUBJECT: **Draft Environmental Impact Statement**
Schofield Generating Station Project
Wahiawa District, Oahu

Air Pollution Control Permit

S015a

As noted in your document, the project will require an air permit from the Clean Air Branch. The project must comply with all applicable permit conditions and requirements.

Control of Fugitive Dust

S015b

A significant potential for fugitive dust emissions exists during all phases of construction. The activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. We encourage the contractor to implement a dust control plan, which does not require approval by the Department of Health, to comply with the fugitive dust regulations. The dust control measures listed in your document should be implemented where appropriate; additional measures may include, but are not limited to, the following:

a) Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
b) Providing an adequate water source at the site prior to start-up of construction activities;
c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
d) Minimizing dust from shoulders and access roads;
e) Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
f) Controlling dust from debris being hauled away from the project site. Also, controlling dust from daily operations of material being processed, stockpiled, and hauled to and from the facility.

If you have any questions, please contact Mr. Barry Ching of the Clean Air Branch at 586-4200.

Sincerely,

NOLAN S. HIRAI, P.E.
Manager, Clean Air Branch

BC:rg

c: Jack Shriver, Hawaiian Electric Company, Inc.
Kristin Shields, Tetra Tech, Inc.

August 6, 2015

Mr. Nolan S. Hirai, P.E.
Manager
Clean Air Branch
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, HI 96817

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Hirai:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

As your letter included detailed comments on the draft EIS, we have annotated the comments with reference numbers S015a and S015b. Your letter, with the annotations included, is attached to provide a reference for the responses provided.

Comment Responses *(listed by reference number)*:

S015a. As noted, Hawaiian Electric will apply for an air permit from the Clean Air Branch. The project will comply with all applicable permit conditions and requirements.

S015b. The comment is consistent with sections 3.4.2.1.1 and 3.4.2.1.3 of the EIS. The following dust control measures outlined in the comment have been added to the list in section 3.4.2.1.3 (in addition to those already in the EIS):

- "Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact.
- Providing an adequate water source at the site prior to start-up of construction activities.
- Landscaping and providing rapid cover of bare areas, including slopes, starting from the initial grading phase.
- Minimizing dust from shoulders and access roads.
- Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities.
- Controlling dust from debris being hauled away from the project site. Also controlling dust from daily operations of material being processed, stockpiled, and hauled to and from the facility."

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

OUR REFERENCE MT-DK

April 27, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
Attention: IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Dear L. Graham:

This is in response to Chief Brian E. Peck's request for comments on a Draft Environmental Impact Statement for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii.

Based on the information provided, this project should have no significant impact on the services or operations of the Honolulu Police Department.

If there are any questions, please call Major Kerry Inouye District 2 (Wahiawa) at 723-8703.

Thank you for the opportunity to review this project.

Sincerely,

LOUIS M. KEALOHA
Chief of Police

By
MARK TSUYEMURA
Management Analyst VI
Office of the Chief

Serving and Protecting With Aloha

August 6, 2015

Mr. Louis M. Kealoha
Chief of Police
Police Department
City and County of Honolulu
801 S. Beretania St.
Honolulu, HI 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Chief Kealoha:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Honolulu Police Department has no comments at this time. Your letter has been assigned identification number L001 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

L002

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

KIRK CALDWELL
MAYOR

MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

April 28, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
Attention IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Dear Mr. Graham:

L002a

In response to a letter from Mr. Brian Peck, Chief of the Military Planning and Environmental Compliance Branch, dated April 15, 2015, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) requires that the following be complied with:

L002b

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet (46 m) from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1 Uniform Fire Code [UFC]™, 2006 Edition, Section 18.2.3.2.2.)

   A fire department access road shall extend to within 50 feet (15 m) of at least one exterior door that can be opened from the outside and provides access to the interior of the building. (NFPA 1 UFC™, 2006 Edition, Section 18.2.3.2.1.)

L002c

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet (45 720 mm) from a

water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1 UFC™, 2006 Edition, Section 18.3.1, as amended.)

3. Submit civil drawings to the HFD for review and approval. L002d

Should you have questions, please contact Battalion Chief Terry Seelig of our Fire Prevention Bureau at 723-7151 or tseelig@honolulu.gov.

SOCRATES D. BRATAKOS
Assistant Chief

SDB/SY:bh

August 6, 2015

Mr. Socrates D. Bratakos
Assistant Chief
Fire Department
City and County of Honolulu
636 South Street
Honolulu, HI 96813-5007

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Bratakos:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your letter has been assigned identification number L002 and will be included, along with this response letter, in appendix A of the final EIS. As your letter included detailed comments on the draft EIS, we have annotated each comment with a reference number from L002b to L002d (L002a is the introduction provided in your letter). Your letter, with the annotations included, is attached to provide a reference to the responses provided.

Comment Responses *(listed by reference number)*:

L002b. The design of the SGSP will comply with the applicable requirements of the Uniform Fire Code.

L002c. The design of the SGSP will comply with the applicable requirements of the Uniform Fire Code.

L002d. Honolulu Fire Department permits and approvals for the project will be sought as detailed in Table 2.2-2 of the EIS.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

L003

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

KIRK CALDWELL
MAYOR

MICHAEL D. FORMBY
DIRECTOR

MARK N. GARRITY, AICP
DEPUTY DIRECTOR

TP4/15-606359R

May 29, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Attention: IMHW-PWE (L. Graham)

Dear Project Planner:

SUBJECT: Draft Environmental Impact Statement for the Schofield Generating Station Project, Schofield Barracks, Honolulu, Oahu, Hawaii

In response to your letter dated April 15, 2015, we have no comments to offer at this time.

Thank you for the opportunity to review this matter. Should you have any further questions, please contact Michael Murphy of my staff at 768-8359.

Very truly yours,

for Michael D. Formby
Director

August 6, 2015

Mr. Michael D. Formby
Director
Department of Transportation Services
City and County of Honolulu
650 S. King St., 3rd Floor
Honolulu, HI 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Formby:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Department of Transportation Services has no comments at this time. Your letter has been assigned identification number L003 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

L004

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843

June 5, 2015

Mr. Brian E. Peck
Chief, Military Planning and Environmental
Compliance Branch
Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii 96857

Attention: IMHW-PWE (L. Graham)

Dear Mr. Peck:

Subject: Your Letter Dated April 15, 2015 Requesting Comments on the Draft Environmental Impact Statement for the Schofield Generating Station Project Tax Map Key: 7-7-001: 001, 002; 7-3-001:001, 002, 006, 007, 008, 009, 011, 012, 013, 019, 022, 024; 7-6-001; 7-6-001, 006; 9-4-012: 001, 003, 011

Thank you for the opportunity to comment on the proposed generating project.

We do not have a water system in the vicinity of the proposed generating plant. Water service should be provided by the private water system in this area.

The construction drawings for the 46 kilovolt sub-transmission line should be submitted for our review.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

August 6, 2015

Mr. Ernest Y. W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, HI 96843

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Lau:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS. The proposed generating station will be connected to the U.S. Army Garrison-Hawai'i's water system as discussed in section 2.2.1.6 of the EIS. Construction drawings for the sub-transmission line will be submitted for review once available.
Your letter has been assigned identification number L004 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

L005

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR

ROBERT J. KRONING, P.E.
DIRECTOR

MARK YONAMINE, P.E.
DEPUTY DIRECTOR

June 8, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison
947 Wright Avenue
Scholfield Barracks, Hawaii 96857

Attn: L. Graham

Dear Sir or Madam:

Subject: Draft Environmental Impact Statement
Scholfield Generating Station Project
U.S. Army Garrison, Hawaii

The Department of Design and Construction does not have comments to offer on the draft environmental impact statement.

Thank you for the opportunity to review and comment. Should there be any questions, please contact me at 768-8480.

Sincerely,

Robert J. Kroning, P.E.
Director

RJK: cf (606329)

August 6, 2015

Mr. Robert J. Kroning, P.E.
Director
Department of Design and Construction
City and County of Honolulu
650 S. King Street, 11th Floor
Honolulu, HI 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Kroning:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Department of Design and Construction has no comments at this time. Your letter has been assigned identification number L005 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

L006

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR

GEORGE I. ATTA, FAICP
DIRECTOR

ARTHUR D. CHALLACOMBE
DEPUTY DIRECTOR

2015/ELOG-753 (lw)

June 5, 2015

Department of the Army
Directorate of Public Works
U. S. Army Garrison, Hawaii
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013

Attention: IMHW-PWE (L. Graham)

Dear Ms. Graham:

Thank you for your letter dated April 15, 2015, regarding a request for comments on a Draft Environmental Impact Statement (DEIS) for the Schofield Generating Station Project, U. S. Army Garrison, Hawaii. We have reviewed the DEIS and do not have any comments to offer at this time.

Should you have any questions, please contact Lin Wong of our staff at 768-8018.

Very truly yours,

for George I. Atta, FAICP
Director

GIA:bkg
1250632

August 6, 2015

Mr. George I. Atta, FAICP
Director
Department of Planning and Permitting
City and County of Honolulu
650 S. King Street, 7th Floor
Honolulu, HI 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Atta:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Department of Planning and Permitting has no comments at this time. Your letter has been assigned identification number L006 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

L007

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU
715 SOUTH KING STREET, SUITE 311 ● HONOLULU, HAWAII 96813 ● AREA CODE 808 ● PHONE: 768-7762 ● FAX: 768-7792

KIRK CALDWELL
MAYOR

GARY K. NAKATA
DIRECTOR DESIGNATE

BARBARA YAMASHITA
DEPUTY DIRECTOR

June 17, 2015

Department of the Army
Directorate of the Public Works
U.S. Army Garrison, Hawaii
947 Wright Avenue
Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5013
ATTN: IMHW-PWE (L. Graham)

Dear Chief Peck:

Subject: Title 32 of the Code of Federal Regulations part 651
ENVIRONMENTAL IMPACT STATEMENT
Schofield Generating Station Project
United States Army Garrison, Hawaii

We have reviewed your letter dated April 15, 2015 and the enclosed Draft Environmental Impact Statement for the Schofield Generating Station Project, U.S. Army Garrison, Hawaii.

Our review of the documents provided indicate that the proposed project will have no adverse impacts on any Department of Community Services activities or projects at this time.

Thank you for providing us with the opportunity to comment on this matter.

Sincerely,

Gary K. Nakata
Director Designate

GKN:jc

August 6, 2015

Mr. Gary K. Nakata
Director Designate
Department of Community Services
City and County of Honolulu
715 S. King St., Suite 311
Honolulu, HI 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Nakata:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that the Department of Community Services acknowledges that the project will have no adverse impacts on the department's activities or projects at this time. Your letter has been assigned identification number L007 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

B001

Hawaiian Telcom

May 13, 2015

Department of the Army
Directorate of Public Works
U.S. Army Garrison, Hawaii
ATTN: IMHW-PWE (L. Graham)
947 Wright Avenue
Wheeler Army Airfield, Schofield Barracks, Hawaii 96857-5013

Dear Ms. Graham:

Subject: **Draft Environmental Impact Statement**
Schofield Generating Station Project
United States Army Garrison, Hawaii

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement regarding the subject project.

Hawaiian Telcom does not have any comments to offer at this time.

If you have any questions or require assistance in the future on this project, please call me at 546-7761.

Sincerely,

Les Loo
Network Engineer – OSP Engineering
Network Engineering & Planning

cc: File

August 6, 2015

Mr. Les Loo
Network Engineer–OSP Engineering
Network Engineering & Planning
Hawaiian Telecom
P.O. Box 2200
Honolulu, HI 96841

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Loo:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS and understand that Hawaiian Telecom has no comments at this time. Your letter has been assigned identification number B001 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

O001

May 21, 2015

Before the US Army Public Meeting at Wahiawa District Park Recreation Center, Wahiawa HI

Re: Supporting Testimony DEIS for construction of 50 Megawatt Power Plant at Schofield Barracks

This testimony is to provide the support of Wahiawa's oldest community association (76 years) the Wahiawa Community and Business Association (WCBA) to the draft environmental impact statement (DEIS) for the Schofield Generating Station Project.

The WCBA Government Action Committee reviewed the comprehensive DEIS and has determined the important issues were satisfactorily addressed including issues regarding cultural, land use and wild life preservation and conservation were eliminated or minimized.

There are many benefits to the Army and to Hawaii including grid reliability and improved Army disaster response capabilities. Of special interest to Wahiawa is improved outage restoration for our community.

The WCBA is in support of this project. The US army has a long-standing reputation for caring for the lands entrusted to them. We strongly urge that the Army proceed toward the implementation of this project.

Sincerely,

Walter R. Benavitz Jr.
Government Action Committee Chair

Wahiawa Community & Business Association
P. O. 861408
Wahiawa, Hawaii 96786

August 6, 2015

Mr. Walter R. Benavitz, Jr.
Government Action Committee Chair
Wahiawa Community & Business Association
P.O. Box 861408
Wahiawa, HI 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Benavitz:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to review the draft EIS, and the Wahiawa Community & Business Association's expressed support for the project. Your letter has been assigned identification number O001 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

P001

From: Ed Wagner <[redacted]>
Sent: Thursday, May 14, 2015 3:55 PM
To: DIV.SGSP Comments
Subject: Statement of Position AGAINST HECO-ARMY Carbon-based Generator Project At Schofield Barracks, Hawaii
Attachments: Small Modular Reactors Senator Fred Hemmings.pdf; Energy Independence Now - Fred Hemmings.pdf

To whom it may concern,

http://www.garrison.hawaii.army.mil/schofieldplant/

Will Rogers said, “Steal a million dollars from one person, and you’re a crook, but steal a dollar from a million people and you are a utility.”

I am surprised that the Army is so supportive of our 19th century dinosaur utility monopoly in its continued pursuit of profit at all costs to ratepayers and planet and its efforts to survive as a monopoly for another 100 years by continuing to use carbon-based fuels - oil, diesel, bio-fuel, and the most environmentally dangerous of all carbon-based fossil fuels, fracked LNG for the next 20 or more years.

If the PUC had done its job the past 102 years since it was formed in 1913 with a mandate to insure that there would never be a utility monopoly in Hawaii, we would not be in this mess. HECO even falsified history to create its new logo.

The HECO monopoly is a serious threat to both State and National security with its incompetent 19th century mentality. Community-based power will provide far greater security and better support of Civil Defense than this financially strapped company or any other monopoly like Nextera.

Nextera is not the Lone Ranger and Tonto coming to save us nor is HECO, a company that rules this town like an out of control outlaw gang in a wild west town of the 1880's. Neither company is our saint and savior. Neither company's management could tell the truth if their lives depended on it, even if they were waterboarded. They are blinded too much by their insatiable lust for and worship of money. They have sold their souls to the devil, and redemption is impossible.

Nextera's Hawaii TV ads are all lies, and if it lies enough times, the people, AND the Army will begin to believe its lies, and those of HECO, as the God's gospel truth. Be careful of a wolf and an alligator in sheep's clothing.

Both companies continue to spread their hush money / bribe money around to silence dissent in the community. Neither has altruistic motives. It's all about profits, not the people, not Spaceship Earth.

UH Regents : Please Say No to Fossil Fuels

http://www.civilbeat.com/2015/05/uh-regents-please-say-no-to-fossil-fuels/

The Army should support the UH in its efforts to divest itself from fossil fuel investments by rejecting HECO's plan for a 19th century generator at Schofield Barracks and move into the 21st century with true renewable energy.

"The goal is nothing less than the salvation of Earth as we know it." - All the more reason for everyone, including the Army, to support all efforts to push HECO out of the way and convert the monopoly to community-owned non-profit power like Hawaii Island, Maui, Oahu, and now Kulolo.org are pushing to do.

The Legislative goal of 100% renewable by 2045 is a wimpy goal based solely upon HECO's need to survive at the expense of the ratepayers and planet. HECO is a classic example of capitalism gone amuck. If we landed a man on the moon in 10 years, we can be 100% renewable in 10 years as well. We just have to have the political will to do it, starting with pushing HECO out of the way.

The Army wants to support HECO's continued carbon-based fuel use in the form of a NEW Schofield Barracks generator to stabilize the grid and provide more grid reliability. The generator will run on biofuel (carbon-based), diesel (fossil fuel), and most importantly, LNG fossil fuel, to protect HECO's profits and monopoly. If HECO has its way, the generator will run primarily on LNG.

As Henry Curtis of Life of the Land pointed out, decarbonization is not a Hawaii goal, although it should be a common sense goal. Carbon-based biofuels are renewable energy under Hawaii law.

"If the amount of energy produced by rooftop solar exactly matches the amount of energy produced by grid-connected fossil fuel generators then Hawai`i has achieved a Renewable Portfolio Standard of 100% according to Hawaii Revised Statutes 269-91."

"Hawai`i would have a totally black grid and have achieved its 100% renewable goal."

http://ililanimedia.blogspot.com/2015/05/aiming-for-moon-100-percent-renewable.html

http://www.civilbeat.com/2015/05/look-closer-when-talking-about-renewable-energy-percentages/

Perhaps the Army can move into the 21st century by installing wind turbines at the Kolekole pass and install more rooftop PV and a solar farm on Schofield and / or Wheeler AAF, and use utility-scale batteries like those announced by Tesla to stabilize the grid with intermittent renewable energy from sun and wind. HECO was or still is in discussion with Moloka'i about batteries to stabilize and improve grid reliability and is researching battery technology for its own use.

Here is a new technology blade-less wind turbine that may be more suitable for Hawaii.

http://www.forbes.com/sites/billtucker/2015/05/07/wind-power-without-the-mills/

Another option might be to sequester a Small Modular Nuclear Reactor (SMR) like those in the Pearl Harbor submarine fleet, at Schofield. After hurricane Iniki, one of those subs went to Kaua'i with the intention of connecting its SMR to the grid to provide badly needed power, but the Navy decided to use diesel generators instead because of the time and resources needed to connect the SMR to the grid.

This SMR approach is one that has often been promoted by retired Hawaii Senator, Fred Hemmings. See his attached arguments for using SMRs. He is on the Bcc line in case he wants to add his 2 cents in separate testimony.

Attorney John Carroll continues with his open lawsuit against the HEI monopoly and the State of Hawaii for breach of public trust, Article XI of our Constitution. The Honolulu rail and Ho'opili are similar Article XI violations and will be dealt with in court as well.

http://pac.petitions.moveon.org/sign/class-action-lawsuit-6/

Retired Senator Fred Hemmings speaking out against HEI
https://www.youtube.com/watch?v=m16aoMSQhDo

Senator Solomon scolding HECO executives in January, 2013
https://www.youtube.com/watch?v=QTKifphm3j8

Senator Solomon talking about a consumer owned grid
https://www.youtube.com/watch?v=Yi2LCyIzvQM

Henry Curtis of Life of the Land gives an excellent, thorough and frank assessment of the dangers lurking behind the scenes for Hawaii ratepayers.

Henry Curtis @ Kokua Council, Jan. 26, 2015
https://www.youtube.com/watch?v=kfCxRrpZtE0&feature=youtu.be

Feb. 2
NEXTERA SENIOR MANAGEMENT IS ABOUT AS INNOVATIVE AS A BROWN PAPER BAG AT YOUR LOCAL GROCERY STORE
https://plus.google.com/112193033219319144952/posts/EovKE1tineE

Dec. 24
NEXTERA ENERGY - IF YOU LIKE ABUSE, THEN THIS COMPANY IS FOR YOU. POLITICS AND BULLY TACTICS ARE THE NORM - JAN-FEB 2014 - GLASSDOOR
https://plus.google.com/112193033219319144952/posts/EhaD9GzgfQE

HEARTBREAKING COMMENTS FROM PETITION SIGNERS ABOUT GETTING SCREWED BY HAWAIIAN ELECTRIC MONOPOLY
https://plus.google.com/112193033219319144952/posts/RombxSH9nYL

This next video explains what the idolatry of money is doing to destroy our only home, Spaceship Earth.

https://www.facebook.com/PrinceEaHipHop/videos/10153278998454769/

NRG electric utility CEO speaking about a sustainable future:

"And make no mistake about our children. They will hold all of us accountable – true believers and climate deniers alike. The day is coming when our children sit us down in our dotage, look us straight in the eye, with an acute sense of betrayal and disappointment in theirs, and whisper to us, "You knew... and you didn't do anything about it. Why?" And for a long time, our string of excuses has run something like this: "We didn't have the technology...it would have been ruinously expensive...the government didn't make us do it..."

But now we have the technology – actually, the suite of technologies – and they are safe, reliable and affordable as well as sustainable. They do not represent a compromise to our ability to enjoy a modern lifestyle. They represent an opportunity for us to do the right thing while multiplying shareholder value through greater value-

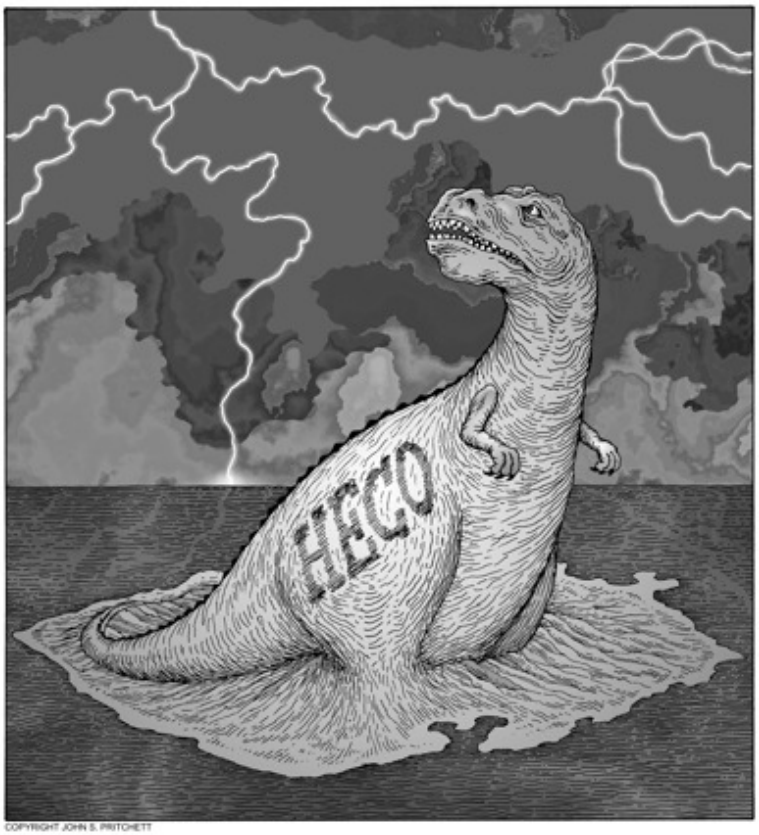
added services. And these technological solutions are focused on the individual consumer - both businesses and individuals.

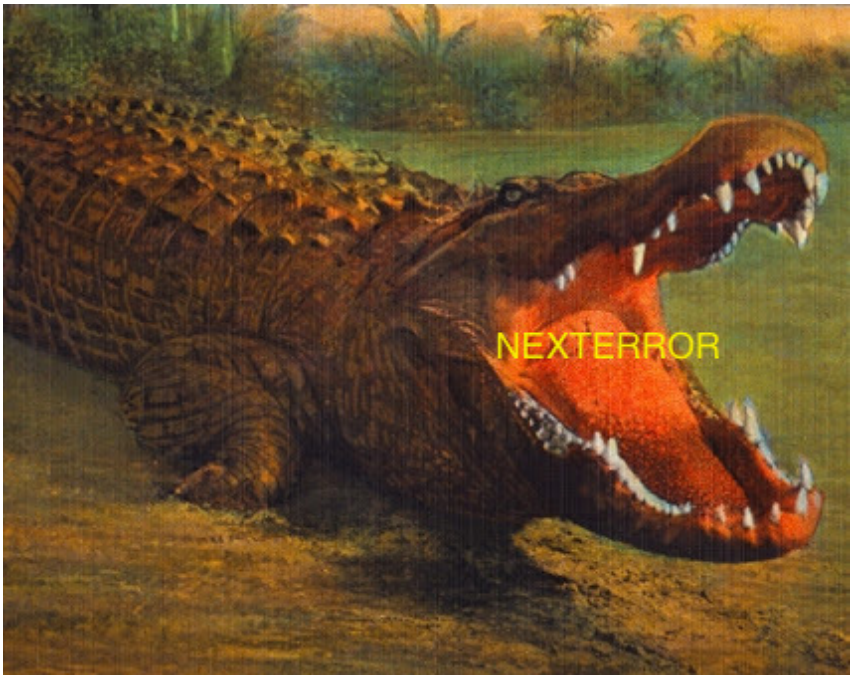
– so the shameful passivity and failure to act of government is irrelevant.

The time for action is now; we have run out of time for more excuses.""

I encourage the Army to learn the truth about HECO from the ratepayer perspective, reject this ill-conceived project that is self-serving to HECO's need to survive as a monopoly and to maintain its profits, and move into the 21st century with true renewable energy that is not carbon-based like this generator project. The survival of Spaceship Earth depends on it.

Facebook.com/stopheco

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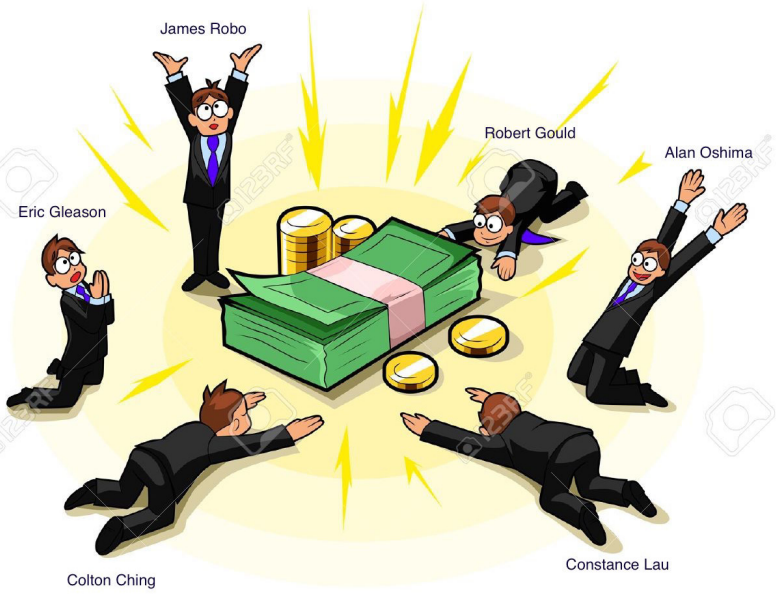
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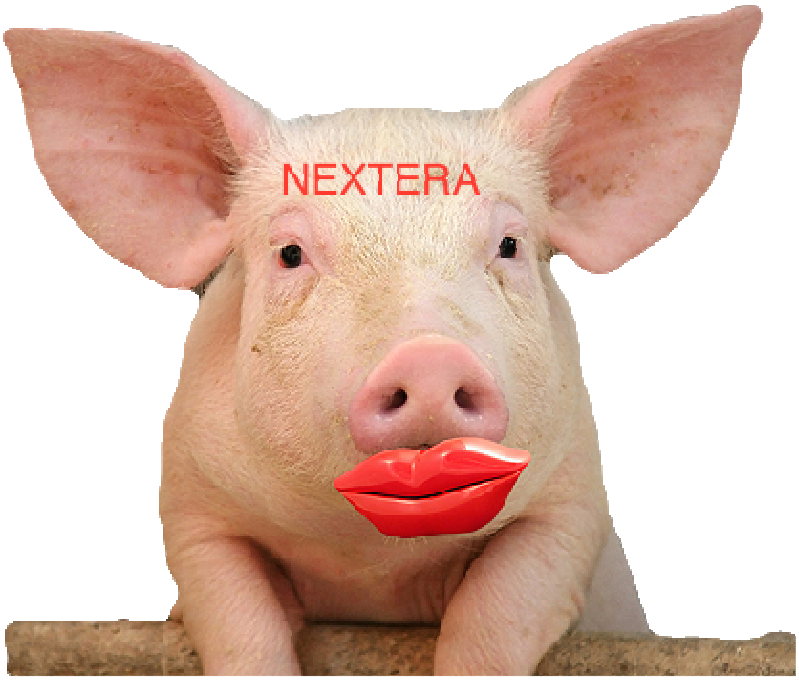
Robert Gould
Alan Oshima
Eric Gleason
Colton Ching
Constance Lau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RATEPAYER
©JOHN PRITCHETT


Clean Up Your Mess! Love Mother

Mahalo Nui,

Ed Wagner

[redacted]
Mililani, HI 96789

Energy Independence Now

Fred Hemmings

Hawaii and America can become energy self-sufficient, weaned from most fossil fuels, and enjoying affordable clean energy within a generation.

The United States Navy can lead the way by developing safe Small Modular Reactors known as SMRs. It is important to note that the United States military has been the source of many modern day, high tech resources, including the internet. SMRs are generally defined as producing 250 megawatts (MW) of electricity or less that can be sequestered safely, even underground. SMRs are designed to easily shut down not melt down. Two hundred fifty megawatts of electricity can provide enough electricity for thousands of homes. The United States Navy already operates the safest form of energy in the world, nuclear propelled submarines and ships. More people have died in one coal mine or oil rig accident than in all the history of nuclear energy in America. It is my proposal to have the Navy utilize their resources to build and deploy Energy Ships. The Navy does not have to endure the 10 year multimillion dollar plus expense of licensing from the Nuclear Regulatory Commission.

In Hawaii the Department of Defense pays over $220 million annually to the local electric company. Unfortunately for the Hawaii's citizens their electricity costs are 3 times the national average and our state is woefully over-dependent on fossil fuels. Most of the military's energy is consumed at Pearl Harbor. Pearl Harbor already has the highest concentration of SMRs in the world, they are called nuclear submarines. One 250 MW Energy Ship that I am proposing would generate enough electricity to power the military in Hawaii. At night excess capacity could energize ground transportation and if need be desalinate water. All this at no additional cost because nuclear energy is 24/7 firm capacity. An Energy Ship could produce energy for decades. Besides affordable electricity an Energy Ship would also provide the military with base security and independence. At current electricity costs an Energy Ship would pay for itself quickly. Energy Ships could be easily deployed to bases around the world. An Energy Ship would also become very handy when the Navy is involved in humanitarian missions. Electricity and clean water are usually in dire need after a natural disaster.

The United States Navy would prove once again that nuclear energy is the solution to our energy and environmental woes. Our nation and Hawaii then could follow the lead of the Navy to develop SMRs for civilian use.

I expect the naysayers will have a knee jerk negative reaction to my proposal. Facts and experience will provide evidence that emotion-based opposition is in error. This happened in the Eighties when the "just-say-no" crowd opposed geothermal energy on the Big Island which I vigorously supported. Some naysayers will also cite the State constitution as banning nuclear energy in Hawaii that is not true.

Most of the world's existing nuclear plants are dinosaurs. They are large and if they go off line it creates a massive shortage of electricity. They need to be replaced. SMRs are the answer.
SMRs can be redundant and built incrementally without the multibillion capital costs of a large nuclear plant. Several SMRs at one site would also provide for redundancy. One SMR could be shut down for maintenance while the others continue to produce electricity. In Hawaii this could easily break up the dependency and inefficiencies of the massive distribution system of Hawaii's monopolistic electric company. Local independent energy production with inter-connections could be a reality. Remember even currently popular natural gas is a fossil fuel.
In addition by not having to depend on less than friendly nations for imported oil Hawaii and our nation would be more secure. Abundant affordable electricity would also put the American automobile industry on the fast track to develop electric cars. That would put America back in the driver's seat of the global automotive industry Enlightened thinkers see the wisdom in SMRs because SMRs would solve the carbon emission problem. Yes wind and solar power are great but they are expensive and not firm capacity. Safe Nuclear energy is cheaper than wind and solar and is reliable. Most of the nation of France's energy comes from nuclear generation and France recycles approximately 80% of their nuclear waste. The day will come when spent nuclear fuel can be recycled or neutralized.

Do you remember the first cell phones? They were the size of a soda bottle. Now look at them. Economies of scale provided the resources for massive development of "smart phones" That same formula would be true for the future of nuclear energy.

I foresee the day when individual neighborhoods and large buildings will have totally sealed and safe SMRs for generation of all of their electricity. They would last for a long time and would simply be replaced rather than refueled. These SMRs would be small and self-contained.

All of this can begin with the United States Navy creating Energy Ships for deployment sooner than later. The boldness and genius of American enterprise can help lead the world to abundant, clean and safe energy.

Fred Hemmings, Hawaii State Senator (2000-2010) is a proponent for Energy independence and sustainability.

Small Modular Reactors: Creating Energy Independence for Hawaii

By Senator Fred Hemmings

Asia Pacific Clean Energy Summit & Expo September 2, 2010

It has been said that "throughout human history, those that have had the wisdom and fortitude to innovate have been the agents of change and have spawned a better world for all humanity".[1][1] In America, our freedom is the fuel of innovation.

Opportunity abounds in Hawaii. We need to be honest with ourselves in considering the reality of energy in our state. The following is well documented. The cost of electricity in the state of Hawaii is our nation's highest.[2][2] At the height of the fuel crisis in 2008, when it was politically correct to bash the oil companies, gasoline in Hawaii cost 35 percent above the national average. [3][3] At the same time, electric prices were 180 percent more than the national average. [4][4] Another sad fact is that Hawaii is one of the states with the highest potential for wind, solar, and other renewable energies, yet it is one of the most dependent on fossil fuels, coal and oil. Instead of moving forward in energy independence, in the last 20 years Hawaii has regressed. We can change this, and we must change it!

Hawaii now has the goal of being 70 percent energy independent by 2030. I say that by 2030 we could be close to 100 percent energy independent from oil and coal for electricity and ground transportation. Does this sound bold? There is an innovative solution to our energy woes which needs to be seriously considered for Hawaii. This option is nuclear energy, and most specifically small modular reactors. For too long, fear and falsehoods have kept the genie of nuclear energy in the bottle.

Let me make it perfectly clear that the Hawaii State Constitution does not, as some would believe, ban nuclear energy from Hawaii. Our Constitution says that 2/3 majority of the House and Senate must approve the use of nuclear energy in our state. What makes this codicil ludicrous is that Hawaii already has the largest concentration of nuclear reactors of any location in the world.[5][5] Currently, sixteen nuclear submarines are based in Pearl Harbor and, at any

given time, there could be up to a half dozen or more nuclear reactors sitting in the harbor. [6][6]

What does the United States military know that we in Hawaii ignore? The answer is that nuclear energy is clean, reliable, and abundant and has the best safety record of any energy source. More people have died in one coal mine or oil related accident than have died in the history of nuclear energy. The financial costs are staggering. The pollution and degradation of our environment caused by coal and oil is incalculable. If carbon emissions are the world's most pressing environmental problem, then nuclear energy is the solution. Breaking technology is now offering a safe and affordable alternative to large nuclear reactors, called Small Modular Reactors, or SMRs. Even enlightened environmentalists have changed their minds about energy and now support nuclear. Greenpeace activist Patrick Moore, Gaia theorist James Lovelock, Greenpeace UK Executive Director Stephen Tindale, Friends of the Earth board member Bishop Hugh Montefiore and environmental icon Stewart Brand have all switched sides in the nuclear energy debate, notes reporter Steve Christ in a recent issue of *Wealth Daily*.[7][7]

Let me give you reasons why small modular reactors would work for Hawaii. Small modular reactors produce from 25 to 250 mw of energy. SMRs are safe for a number of reasons. Some SMRs use a helium-cooled high-temperature system with direct-cycle gas turbines which prevents meltdown[8][8], others are traditional designs. They can be sequestered underground, thus increasing safety and security. Small modular reactors also provide redundancy—if one goes offline for repair or maintenance, the others can keep energy flowing. Another reason that SMRs make sense is cost. I am a huge proponent of wind, solar and geothermal, but, since wind and solar do not provide firm capacity, other firm energy resources must be used. Wind and solar can also be land intensive. For instance, one small SMR producing 250mw of electricity will incorporate about five acres of land. To produce the same amount of energy will take about 578 acres of land for 12 wind turbines as illustrated by the new Kahuku wind farm. [9][9]

It may not be news to you that I oppose the proposed undersea cable which is a boondoggle we cannot afford. It would contribute to the monopoly grid and could create system wide blackouts. Projected cost is over a billion dollars and does not include the wind farms. Unfortunately there are some politicians that don't understand that all business costs are ultimately paid by the consumers. The genius of small modular reactors, solar panels on roofs and wind generation is that they do not have to be centralized. In the case of energy, big is not necessarily better. Energy independence for individual houses with solar panels, communities with wind mills and select small modular reactor energy plants will

be much more cost effective and efficient in the distribution of electricity and provide for security.

Speaking of security, it is unfathomable that America is buying fossil fuel from nation states that wish our country ill. You can be sure that some of the money we are spending in the Middle East for oil ends up in the hands of Islamic extremists who have declared and are waging the war of terror. Energy independence also means geopolitical security for our state, and our nation.

Curiously, there is a rapidly developing interest in SMRs on a national level. I have been to Washington twice to give speeches on expediting Small Modular Reactor Legislation, one sponsored by the Nuclear Energy Institute in February, and most recently the Nuclear Energy Symposium in Alexandria Virginia. I also gave a similar talk to a Conference on Military Energy Independence in San Diego, California last March.

America needs to revamp the licensing of nuclear energy plants which I have outlined in suggested legislation. I have met with several congressmen who are considering the legislation to expedite licensing of SMRs. The problem in achieving this goal is a government bureaucracy called the Nuclear Regulatory Agency. Incredibly, a new nuclear energy plant is just now going online in the United States after 30 years. It takes over ten years to get a permit from the NRC, and may cost many millions of dollars. Recently a "Nuclear Caucus" has been formed in Congress.

Additionally, operating under archaic laws passed during the Jimmy Carter Administration, America is not recycling spent nuclear fuel. I'm not just speculating that recycling works. It does work. Look at France, where 80 percent of their energy comes from 59 nuclear plants and 90 percent of the waste is recycled. I'm here to tell you that with new technology and economies of scale, nuclear waste will not be a problem if we follow the example established by other countries such as France. I am holding in my hand legislation which was recently passed by the Commonwealth of the Northern Mariana Islands (CNMI). Let me read a portion of the findings cause. This was signed into law by their governor Benigno R. Fitial. CNMI has gone from an island nation that formerly banned nuclear energy to a nation and is now fast tracking its development through small modular reactors. America should lead the world in energy innovation and technology, and we can! The list of well respected companies developing SMRs includes Babcock and Wilcox, Bechtel, GE-Hitachi, Westinghouse, Toshiba, and a host of new companies such as Bill Gates' TerraPower and Hyperion.

Small modular reactors are extremely cost effective. The average cost of wind is

four to eighteen cents per kilowatt hour and solar is fourteen to thirty cents per kW hour.[10][10] These are both considered intermittent sources of power. Nuclear energy, which is a baseload source, can range from six to thirteen cents per kW hour.[11][11] Incredibly in Hawaii we are now paying about 27 cents per kW hour for electricity.[12][12]

Everyone is talking about the electric car company TESLA whose stock soared when they went public. America can once again gain world leadership in ground transportation rather than yielding to companies such as Toyota and Honda. How? Through the use of wind, sun and small modular reactors we can have enough electricity and firm capacity to energize our cars and have an entire electric fleet by 2030. Recently HECO has also agreed to generate more electricity at a reduced rate to energize electric cars. The punch line is that we don't currently have enough clean electricity in Hawaii and increased production will come from expensive fossil fuels. This doesn't make sense does it?

How about water? One small modular reactor electrical plant could provide enough energy to make an entire island, such as Kahoolawe, a virtual paradise. There would be enough excess energy produced to run a desalination plant. Water could be pumped up to a reservoir which could then irrigate the entire island or store energy. The production of abundant, clean water could be a reality statewide and contribute significantly to agriculture and food sustainability.

I freely admit that what I am proposing today may scare people and create a backlash, but we must make decisions based on fact, and not emotions based on falsehoods and outdated information. Look at the number of great initiatives that have been thwarted because of ill informed vocal opposition. The Big Island could have been energized with geothermal 25 years ago. In the eighties, I advocated to Governor Waihee what could have been a multibillion dollar industry for Hawaii. A space launch site on the southeast flank of the Big Island, which is the best place in the world for polar and equatorial launches, could have been a reality. The proposal never got off the ground, excuse the pun, because of a handful of opponents. Just recently, look what happened to the Super Ferry.

I am one state senator that sees great opportunity for our state to achieve sustainability in all its forms…food, energy, and security. We cannot stagnate. We must revolutionize energy generation in Hawaii.
Please remember the greatest strides in human history have been made by those who have not sustained the status quo, rather by those who have changed it. We can't wait for an energy evolution, we need an energy revolution. SMRs ARE revolutionary technology which could create energy independence for our

---

Recent response From Fred to email about nuclear reactors offshore.

I advocate SMR energy ships that could generate 250 MR
1. Military coastal bases (Pearl Harbor/Hickam) energy
2 . At low demand times Excess capacity at no additional
Costs could be used to desalinate water and
Energize electric vehicles.
3 this would make for independence, sustainability at
less costs in Hawaii than buying from HECO
Emery ships would be as safe or safer than nuclear
Submarines which have a perfect safety record. In addition that energy
Ships could be quickly out of port and at sea
Pending a natural or other disaster
Hopefully I can get invited to the Asian Pacific energy conference
To advocate SMRs in changing energy world

Energy ships with SMRs similar to submarines could be built and supply energy cleanly and safely. There are over 16 Nuclear submarines based at Pearl Harbor and at any time along with nuclear surface vessels numerous nuclear energy plants are in Pearl Harbor. Remember Hawaii has the highest concentration of nuclear plants any where in the world. A SMR Energy ship as I propose tied up in Hilo harbor and one tied up on the Kona coast would provide enough electricity for the big isle and non peak use could energize electric cars and desalinization plants. Not only would the reactors be safely secured on the energy ships they would also be portable. Energy ships could service all isles. Even Kahoolawe could be turned into a vibrant green isle. What happen in Japan is a logical reason why our nation must wean ourselves from archaic dinosaur big reactors that are 50 plus year old technology. For the record bio energy is inefficient and we should be using our farming resources for food. Our state desperately needs to be more self sufficient, we are precariously dependent. I am ready to assist this effort where appropriate.

Fred Hemmings

Retired Navy - Name withheld for privacy reasons

On the offshore reactor idea – I am a FIRM believer in a STATE-WIDE

GRID. That means each island connected to another through an undersea/ terrestrial backbone of high voltage power lines. I'm not sure if we want to use cryogenically-cooled cables and run HVAC or something less – but one way or another, there has to be the ability for power sharing amongst the islands if we ever want to see this state come into the modern age of energy and have an efficient energy system. Even without the oil-rig-mounted nuclear power plant, we still need cables connecting the islands. Preferably owned/operated by someone NOT HECO.

The oil-rig-mounted reactor power plant would probably be something we'd need two of, perhaps three, with one to start, on Oahu - – and the reactor doesn't need to be under a dome like the SBX – it just needs to be contained ON THE FLOATING PLATFORM with a way to ensure the ability to scuttle the system if an unforeseen event (like Fukushima) occurs that the tertiary and more redundant, higher level systems can't handle. Anyone who does not have a problem with the small footprint of SBX on the horizon on her way out to see (probably most have never even seen it) wouldn't even another oil rig/power plant located a little closer to land.

_____

August 6, 2015

Mr. Ed Wagner
[redacted]
Mililani, HI 96789

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Wagner:

Thank you for your email dated May 14, 2015, concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

The objectives of NEPA and Chapter 343 are to ensure that environmental concerns receive appropriate consideration in the decision making process, along with economic and technical concerns. This EIS is a disclosure document. We are responding by providing information related to the environmental concerns raised by your comments.

Regarding your list of potential fuels that could be used in the proposed project, the Army and Hawaiian Electric consider the fuel flexibility of the proposed project to be a contributor to the Army's and O'ahu's energy security. The specific sourcing of the potential fuels for the project is outside the scope of this EIS, for the reasons discussed in section 2.2.1.5 of the EIS.

Regarding your suggestion that the Army install wind and solar generation capacity supplemented by batteries instead of implementing the proposed project, similar alternatives were considered and are detailed in sections 2.4.2 and 2.4.4 of the EIS. As stated in section 2.1 of the EIS, a requirement of the proposed project is the capability to provide all of the required electrical power and energy to the Army installations for 5 continuous days without resupply from off-site and up to 30 days without resupply from off-island in the event of an extended outage (e.g., from a natural disaster or other supply interruption). The provision of a wind or solar facility—even with battery backup—could not meet that level of energy security and was not considered a viable alternative.

Regarding your suggestion to consider using a small modular reactor (SMR), that alternative was not considered because a stated purpose of the project is to provide renewable energy generation. Under current state regulations, nuclear power is not considered renewable energy, so an SMR would not contribute to the achievement of state or Army renewable energy goals.

Your email has been assigned identification number P001 and will be included, along with this response

letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

From: Miriam Peters <[redacted]>
Sent: Wednesday, May 20, 2015 5:49 PM
To: DIV.SGSP Comments
Subject: Bio fuel power plant comment period

My name is Miriam Peters. I am of Native Hawaiian descent. My father retired from the army in 1988, SFC Francis Peters SR. Therefore, thru the influence of the military, my family has taken up residence in the heights of Wahi'awa since 1985. I would like to submit this request to extend the comment period on the EIS of the biofuel power plant. Unfortunately, the Neighborhood Board #26 (Wahiawa/Whitmore) was in recess for the month of april, thus, many community members have just been made aware of the availability of the Evironmental Impact Statement on May 18, 2015. I would like adequate time to review the EIS and submit comment in regards to the historic land/sites that this project may disturb l and any other things that may be affected by this project.
I would like to request a minimum extention of 45 days from the dates of the second presentation planned to occur on thursday May 21, 2015. With the possibility for further extension based on the information or possible lack there of presented at a community level.
With that, Thank you for your time and concern in the comments of the public.

Miriam-Christene H. Peters

August 6, 2015

Ms. Miriam C. Peters
[redacted]
Wahiawa, HI 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Peters:

Thank you for your letter concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

U.S. Army Garrison-Hawai'i and Hawaiian Electric have met and exceeded public involvement and notification requirements for the proposed project. To keep the community apprised of the development of the project and the EIS, U.S. Army Garrison-Hawai'i and Hawaiian Electric published notices in federal and state publications; distributed notices by mail; held public meetings; reached out to area elected officials, neighborhood boards, and community leaders; and provided project information at 19 libraries and online at http://www.garrison.hawaii.army.mil/schofieldplant/.

The draft EIS was made available for a full 45 days per the requirements of NEPA (40 CFR 1506.10(c)) and Hawai'i Revised Statutes Chapter 343, Environmental Impact Statements. The comment period will not be extended.

In regards to your concern that the project could affect historic lands or sites, the EIS documents the thorough analysis that was conducted of the potential for adverse effects to traditional cultural resources. A cultural impact assessment was conducted per the requirements of HEPA and a determination was made that the project would have no adverse effects on traditional cultural practices, beliefs, or resources. The EIS also was coordinated with the State Historic Preservation Division under section 106 of the National Historic Preservation Act, and the project was found to have no potential for adverse effects on archaeological resources or historic properties. The only impact to cultural resources potentially resulting from the project would be a minor adverse effect on the viewshed within the Wheeler Historic District. New poles and associated transmission lines would be visible from some of the buildings in the district. The Army and Hawaiian Electric intend to implement best management practices to minimize the visual intrusiveness of the new poles and lines.

Your letter has been assigned identification number P002 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

P003

From: Robert Young <[redacted]>
Sent: Thursday, May 21, 2015 1:15 AM
To: DIV.SGSP Comments
Subject: Bio diesel quality

We have experience extremely poor quality biofuel on Maui. Production seems sloppy and caused fouled engines and filters. The company denied any problem and left users to repair their own rigs. Very poor customer service.

August 6, 2015

Mr. Robert Young
[redacted]

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Young:

Thank you for your email dated 5/21/2015 concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Thank you for sharing your experience regarding poor quality biofuel. Hawaiian Electric's biofuel contracting process includes quality assurance requirements that are designed to avoid situations such as those you describe and, if such problems do occur, to protect our customers from electrical reliability and cost repercussions.

Your email has been assigned identification number P003 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

From: ed.j.wagner[redacted] on behalf of Stop HECO <StopHeco.Hi@gmail.com>
Sent: Thursday, May 21, 2015 2:39 PM
To: DIV.SGSP Comments
Subject: Statement of Position AGAINST HECO-ARMY Carbon-based Generator Project At Schofield Barracks, Hawaii

To Whom it may concern,

http://www.kitv.com/news/new-power-plant-could-be-headed-to-central-oahu/33141216

What will happen to this project if powers to be in Washington finally commit to downsizing the Army in Hawaii, reduce the Army presence at Schofield and WAAF, or even close them?

$170 million could put up a lot of clean PV panels, battery backup, and energy efficiency makeovers for homes and buildings.

What will happen if ratepayers succeed in winning their breach of public trust lawsuit against HECO and the State? What will happen if HECO gets kicked in the okole by a court lawsuit for its fraudulent, criminal behavior in the geothermal RFP? What will happen if the serious allegations made against Hawaiian Electric Light Company in collusion with its monopoly partner, Puna Geothermal Ventures (PGV), are proven true in the current ORMAT-PGV whistleblower lawsuit?

What will happen if the State finally rescinds the HECO franchise that it has violated for many, many years, condemns its assets, and converts the company to community-owned, non-profit power? The company is a serious threat to both state and national security, and community-owned power will be way better for both security and civil defense.

HECO falsified history just to create its new logo, and some have said, and I'm seeking proof, that it was involved in the overthrow of the monarchy in1893. It is the most unethical, immoral, unscrupulous, incompetent, financially strapped, ignorant, fraudulent and criminal organization in Hawaii. It has sold its soul to the devil, and it is beyond redemption.

It is a classic example of capitalism gone amok. It is the kind of company that hedge fund manager and philanthropist, Paul Tudor Jones II, refers to in his TED Talk - Why we need to rethink capitalism. **A laser focus on profits is, as he puts it, "threatening the very underpinnings of society."**

http://www.ted.com/talks/paul_tudor_jones_ii_why_we_need_to_rethink_capitalism

The Army wants to support HECO's continued carbon-based fuel use in the form of a new Schofield Barracks generator to stabilize the grid and provide more grid reliability. The generator will run on biofuel (carbon-based), diesel (fossil fuel), and most importantly, LNG fossil fuel, to protect HECO's profits and monopoly. If HECO has its way, the generator will run primarily on LNG, and the presentation by HECO-Army showed the LNG equipment alongside the photo of the power plant.

HECO claims that it wants to import LNG as a bridge to renewables so why is the army and HECO referring to this project as renewable? The State Energy Office submitted its own scathing testimony to the PUC about HECO's PSIPs, and stated that HECO's use of LNG will be a bridge to more LNG. Once the millions are spent

on LNG infrastructure, HECO will fight tooth and nail to keep using LNG for the next 50 years or however long supplies last, to protect its bottom line.

“UH Regents : Please Say No to Fossil Fuels” article in the news.

The Army should support the UH in its efforts to divest itself from fossil fuel investments by rejecting HECO's plan for a 19th century generator at Schofield Barracks and move into the 21st century with true renewable energy.

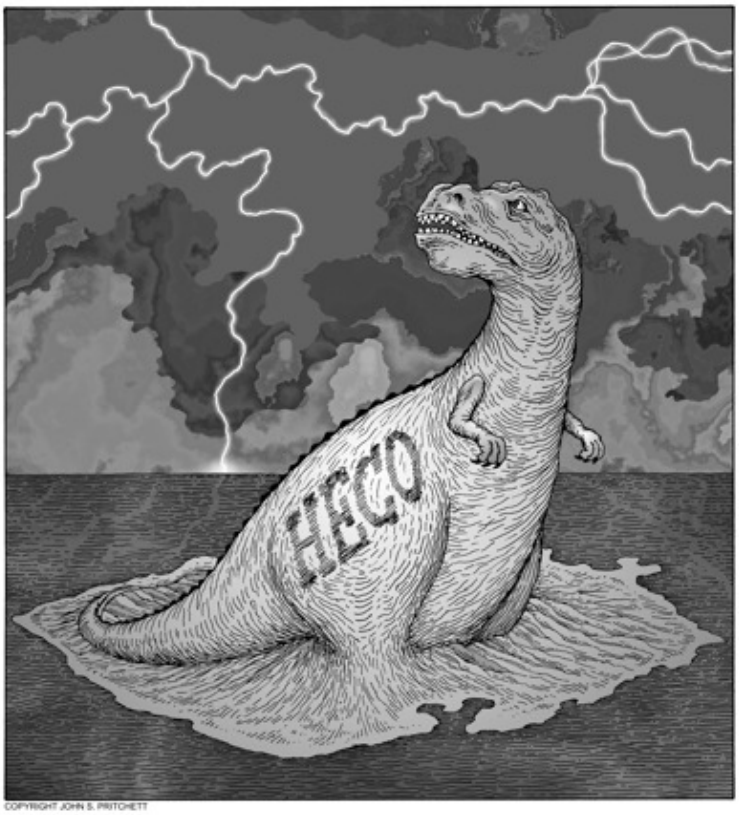
“The goal is nothing less than the salvation of Earth as we know it.” - All the more reason for everyone, including the Army, to support all efforts to push HECO out of the way and convert the monopoly to community-owned non-profit power like Hawaii Island, Maui, Oahu, and now Kulolo.org are pushing to do.

As Henry Curtis of Life of the Land pointed out, decarbonization is not a Hawaii goal, although it should be a common sense goal. Carbon-based biofuels are renewable energy under Hawaii law.

“If the amount of energy produced by rooftop solar exactly matches the amount of energy produced by grid-connected fossil fuel generators then Hawai`i has achieved a Renewable Portfolio Standard of 100% according to Hawaii Revised Statutes 269-91.”
“Hawai`i would have a totally black grid and have achieved its 100% renewable goal.”

Perhaps the Army can move into the 21st century by installing wind turbines at the Kolekole pass and install more rooftop PV and a solar farm on Schofield and / or Wheeler AAF, and use utility-scale batteries like those announced by Tesla to stabilize the grid with intermittent renewable energy from sun and wind. HECO was or still is in discussion with Moloka’i about batteries to stabilize and improve grid reliability and is researching battery technology for its own use.

I encourage the Army to learn the truth about HECO from the ratepayer perspective, reject this ill-conceived project that is self-serving to HECO's need to survive as a monopoly and to maintain its profits, and move into the 21st century with true renewable energy that is not carbon-based like this generator project. The survival of Spaceship Earth depends on it. Stop living in the 19th century with this dinosaur.



facebook.com/StopHeco

Sincerely,

Ed Wagner
Mililani, HI

August 6, 2015

Mr. Ed Wagner
[redacted]
Mililani, HI 96789

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Wagner:

Thank you for your email dated May 21, 2015, concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

The objectives of NEPA and Chapter 343 are to ensure that environmental concerns receive appropriate consideration in the decision making process, along with economic and technical concerns. This EIS is a disclosure document. We are responding by providing information related to the environmental concerns raised by your comments.

Regarding your question about how future force reductions or base closures in Hawai'i would affect the project, any reduction in force structure in Hawai'i would not change the proposed project. Although the 32-megawatt peak electrical demand of the Army's facilities might be reduced in that case, the other purposes and needs for the project would still apply, and the benefits to all Hawaiian Electric customers would remain substantially the same.

Regarding your list of potential fuels that could be used in the proposed project, the Army and Hawaiian Electric consider the fuel flexibility of the proposed project to be a contributor to the Army's and O'ahu's energy security. The specific sourcing of the potential fuels for the project is outside the scope of this EIS, for the reasons discussed in section 2.2.1.5 of the EIS.

Regarding your question as to why the project is considered a renewable energy project, the proposed project includes a requirement to use biofuels as part of the fuel mix, as discussed in section 3.4.2.1.2. This requirement to use a minimum of 50 percent biofuel, with an annual minimum biofuel use requirement, will ensure that the project will generate renewable energy throughout the life of the project.

Regarding your suggestion that the Army install wind and solar generation capacity supplemented by batteries instead of implementing the proposed project, similar alternatives were considered and are detailed in sections 2.4.2 and 2.4.4 of the EIS. As stated in section 2.1 of the EIS, a requirement of the proposed project is the capability to provide all of the required electrical power and energy to the Army installations for 5 continuous days without resupply from offsite and up to 30 days without resupply from off-island in the event of an extended outage (e.g., from a natural disaster or other supply interruption).

The provision of a wind or solar facility—even with battery backup—could not meet that level of energy security and was not considered a viable alternative.

Your email has been assigned identification number P004 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

From: Ed Wagner <[redacted]>
Sent: Sunday, May 31, 2015 11:23 PM
To: DIV.SGSP Comments
Cc: John Carroll; sens@capitol.hawaii.gov; reps@capitol.hawaii.gov; PUC; mark.b.glick@dbedt.hawaii.gov
Subject: Statement of Position AGAINST HECO-ARMY Generator Project At Schofield Barracks, Hawaii

To whom it may concern,

I just wanted to be clear about the very distinct possibility that Army reductions will occur at Schofield and Wheeler AAF next year. The possibility also exists that both bases will be closed and turned over to the State.

Could Army Downsizing Be Good for Oahu?
The military controls 25 percent of Oahu land. The downsizing would affect a portion of the Army, potentially paving the way for the return to the state and its people of Schofield Barracks, Wheeler Army Air Field, Dillingham Military Reservation, Makua Valley and the Kolekole Pass road, along with their structures and facilities.

http://hawaiipoliticalinfo.org/node/8109

What then becomes of this fossil fuel generator if the bases are closed and the land returned to the State?

http://www.hawaiiarmyweekly.com/2014/01/24/downsized-army-troop-levels-could-drop-to-420000-by-2019/

Army Downsizing Could Be a Great Blessing
http://hawaiipoliticalinfo.org/node/8159

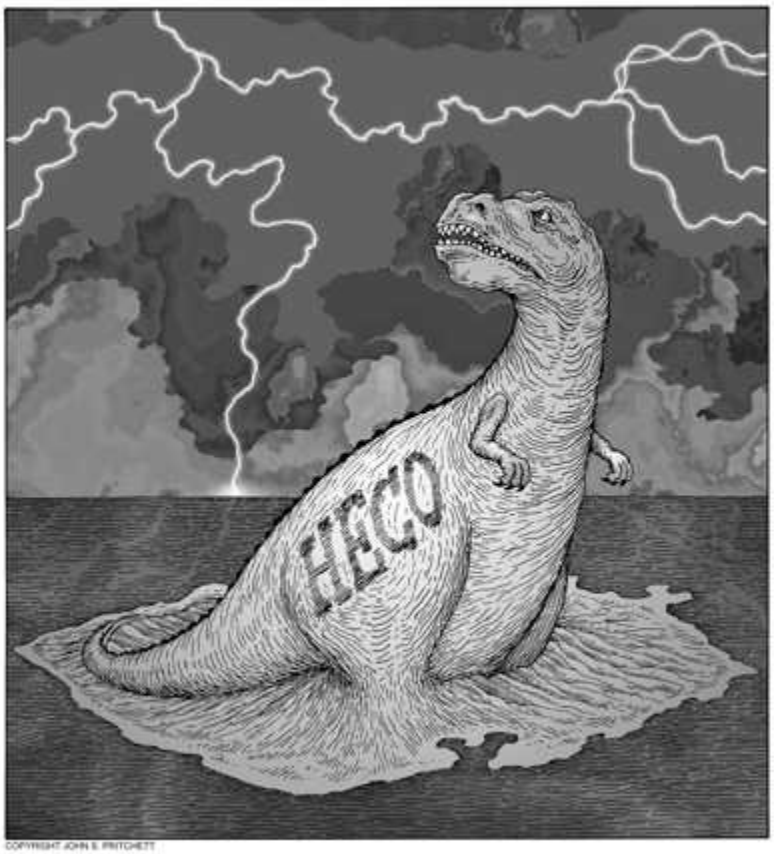
The U.S. Army is largely leaving Hawaii, but Maui Rep. Kaniela Ing is the only state official happy about it
http://mauitime.com/news/politics/u-s-army-preparing-leave-hawaii-besides-maui-rep-kaniela-ing-seem-happy-see-go/?hvid=3hrWJt

A case for army downsizing in Hawaii
http://hawaiiindependent.net/story/army-downsize-a-huge-positive-for-hawaii

Stop protecting, supporting, and perpetuating monopoly power in Hawaii when the entire State is now pushing for public power. HECO is a serious threat to State and national security, all the more reason to convert it to public power that will make Hawaii, and the military more secure than ever possible with a money worshiping dinosaur monopoly.

It literally falsified history to create its new logo and that same history suggests that it was involved in the overthrow of the Hawaiian Monarchy on January 12, 1893. It is the most incompetently managed, financially strapped, fraudulent and criminal organization in Hawaii.

Constance Lau and other top management should be stripped of their pensions and bonuses as ill gotten wealth tearing the shirts off the backs of ratepayers. Lau should be removed by the Board, stripped of her pension, and put in prison for mass financial rape of over a million ratepayers.



Sincerely,

Ed Wagner
[redacted]
Mililani, HI 96789
facebook.com/StopHeco

--
Mahalo Nui,

Ed Wagner
Facebook.com/stopheco

August 6, 2015

Mr. Ed Wagner
[redacted]
Mililani, HI 96789

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Wagner:

Thank you for your email dated May 31, 2015, the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

The objectives of NEPA and Chapter 343 are to ensure that environmental concerns receive appropriate consideration in the decision making process, along with economic and technical concerns. This EIS is a disclosure document. We are responding by providing information related to the environmental concerns raised by your comments.

Regarding your question about how future force reductions or base closures in Hawai'i would affect the project, any reduction in force structure in Hawai'i would not change the proposed project. Although the 32-megawatt peak electrical demand of the Army's facilities might be reduced in that case, the other purposes and needs for the project would still apply, and the benefits to all Hawaiian Electric customers would remain substantially the same.

Your email has been assigned identification number P005 and will be included, along with this response letter, in appendix A of the final EIS. We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

P006

From: Fred Asmus <[redacted]>
Sent: Monday, June 01, 2015 8:48 AM
To: DIV.SGSP Comments
Subject: opposed to sgsp project

P006a

As a concerned citizen and resident of Wahiawa I am opposed to the SGSP project for a number of reasons. Mainly the need for approx. 31 new power poles that would be an eyesore to the landscape. I suggested and questioned why the lines necessary for the project could not be placed underground and was told it was economically unfeasible. I think the whole project is unfeaseable and not a benefit to the public. Also I find it absurd that the public informational meetings were not properly advertised to the community and that the comment period too short. Also the project is too close to the Wheeler Field flight path. Recently trees around the Leilehua Golf Coarse were removed due to the "hazard" to aircraft operations in the area and now the project is requesting to add more 90 foot utility poles in the project area. This seems wrong and contradictory. I am against this project. Mahalo, Fred Asmus

P006b

P006c

August 6, 2015

Mr. Fred Asmus
[redacted]
Wahiawa, Hawai'i 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Asmus:

Thank you for your email concerning the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP). This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) [Chapter 343, Hawai'i Revised Statutes (HRS)] and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

Your email has been assigned identification number P006 and will be included, along with this response letter, in appendix A of the final EIS. As your email included detailed comments on the draft EIS, we have annotated each comment with a reference number from P006a to P006c. Your email, with the annotations included, is attached to provide a reference to the responses provided.

***Comment Responses** (listed by reference number)*:

P006a. As part of Hawaiian Electric's application to the Public Utilities Commission (PUC) for approval of the Schofield Generating Station Project in Docket 2014-0113, the company analyzed options for overhead versus underground transmission lines. The analysis showed that placing the lines underground would result in an estimated $15 million higher cost than placing them overhead. Based on the company's goal of reducing customer costs, the application recommended placing the lines overhead.

As required by Hawai'i state law (HRS 269-27.5), the PUC held a public hearing on this issue on January 21, 2015, to determine if the public had concerns about the placement of the 46kV lines overhead versus underground. The hearing was also attended by a representative of the Division of Consumer Advocacy. No objections to the proposed overhead lines were heard.

The decision as to whether the transmission lines would be placed overhead or underground rests with the PUC. If you wish to express your opinion that the lines should be placed underground to the greatest extent possible, Hawaiian Electric respectfully suggests that you address your concerns to the PUC (http://puc.hawaii.gov/) and/or the Division of Consumer Advocacy (http://cca.hawaii.gov/dca/) as a "public comment" to Docket 2014-0113.

P006b. U.S. Army Garrison-Hawai'i (USAG-HI) and Hawaiian Electric have met and exceeded public involvement and notification requirements for the proposed project. To keep the community apprised

of the development of the project and the EIS, USAG-HI and Hawaiian Electric published notices in federal and state publications; distributed notices by mail; held public meetings; reached out to area elected officials, neighborhood boards, and community leaders; and provided project information to 19 libraries and online at http://www.garrison.hawaii.army.mil/schofieldplant/.

The EIS was made available for a full 45 days per the requirements of NEPA (40 CFR 1506.10(c)) and HRS Chapter 343, Environmental Impact Statements. The comment period will not be extended.

P006c. Section 3.2.2 of the EIS addresses environmental consequences to airspace. As stated in section 3.2.2.1:

> "No significant impacts on airspace would be expected if the Proposed Action is implemented. Neither construction equipment nor the generating station structure would create an obstacle to air navigation or adversely affect military and civilian aviation operations. The two exhaust silencer stacks at the generating station would be approximately 95 feet above ground level, and transmission poles would be 60 to 80 feet above ground level. Some construction equipment used to build these structures would be slightly taller. The height of these structures and their proximity to Wheeler Army Airfield was a critical consideration informing the project design throughout the process."

The section also details the notification and coordination requirements among Hawaiian Electric, the Army, and the Federal Aviation Administration. Section 3.2.2.1.1 of the EIS further states:

> "The site layout design and all construction operations (including equipment operation) would have to meet the airfield clearances and other requirements of UFC 3-260-01, Airfield and Heliport Planning and Design. Hawaiian Electric, USAG-HI, and Wheeler Army Airfield Aviation Safety would work together to resolve any project design or construction issues that could affect Wheeler Army Airfield flight operations and to make sure the plan conformed to UFC 3-260-01. Any issues would be satisfactorily resolved before construction to minimize impacts on airports and airfields, navigable airspace, and flight routes and flight patterns."

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiative

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MR. WALTER BENAVITZ:

The WCBA is Wahiawa's oldest community organization, we've been around for 75 years, and our Government Action Committee went through the entire -- the entire EIS, this Draft EIS.

And we -- I am here to give WCBA's support to this project. Of special interest to us is the improved outage restoration for Wahiawa. We find that the EIS has addressed the cultural, the land use issues, wildlife preservation and those issues, and, again, we are in support of this, this program.

And Schofield Barracks is our neighbor, and they have a long history of taking care of the lands that has been entrusted to them, and we strongly urge that the Army proceed toward implementing this project.

Thank you.

August 6, 2015

Mr. Walter R. Benavitz, Jr.
Government Action Committee Chair
Wahiawa Community & Business Association
P.O. Box 861408
Wahiawa, HI 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Benavitz:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments in support of the project on behalf of the Wahiawa Community & Business Association. Your comments have been excerpted from the transcript of the meeting and assigned identification number P007. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

P008

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MS. ALECIA AU:

P008a

I just wanted to know two questions. Could you have the facility on not ag [agricultural] lands? Ag lands are precious to us, and one day it may be put to use in that area.

P008b

Second question is, have you considered having more than one plant? If there is a time when we have war, if one plant is destroyed, at least we could have another plant on the island to fall back on.

Thank you.

August 6, 2015

Ms. Alecia Au
[redacted]
Wahiawa, HI 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Au:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments. Your comments have been excerpted from the transcript of the meeting and assigned identification number P008. As your statement included detailed comments on the draft EIS, we have annotated each comment with a reference number (P008a and P008b). The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

P008a. The Army and Hawaiian Electric acknowledge the importance of agricultural lands to the people of O'ahu and note that the generating station would not be built on agricultural land. As stated in section 3.8.1.3 of the EIS:

> "The 8.13-acre generating station site is a portion of the larger 535-acre South Range Acquisition Area (referred to as the South Range) that was assessed in the SBCT EIS in 2004. As part of that NEPA process, the Army coordinated the conversion of the land from prime farmland to nonagricultural use with Natural Resources Conservation Service in light of the objectives and guidelines of the Farmland Protection Policy Act. The estimated 535 acres of what at that time was cultivated pineapple land was 0.67 percent of the total US Department of Agriculture-designated agricultural land on Oahu and 2.8 percent of the total area in pineapple production in the state (Tetra Tech 2004). The Stryker Brigade Combat Team EIS concluded that the conversion of the entire South Range to nonagricultural use would not result in significant impacts."

The Natural Resources Conservation Service's Form AD-1006 (Farmland Conversion Impact Rating Form) process was completed in 2015.

P008b. A second plant was not considered. The proposed SGSP would be one of several generating stations on the island that provide electricity to the Army and surrounding community. In the event that any one of the seven existing major generating stations on the island (eight if the SGSP is constructed) is destroyed for any reason, the remaining generating stations would be able to continue supplying power to the island grid.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MS. LEI LEARMONT:

And I want you to know that I did hear the presentation to the neighborhood board, and so I know something about it, you know, before tonight. And I remember many years ago, one day we had a brown-out, I think we had two brown-outs, and one of 'em had to do with something happening at one of the plants. And I think it might have been downtown plant, when it was still active, and somehow certain things had to happen in a generation to bring up the plant again. And the Kahe Plant, which I know very well because I used to work in Waianae, was down for maintenance. So they were already low. And what happened is that they couldn't meet that, and the whole island went black, when they call it a brown-out. And, you know, it was days before they were able to put things together to have the electricity come up again. So it's really gratifying to know that you'll have a generator here in Wahiawa, and, hopefully, this means that if we have a blackout, then we'd be the first to get -- you know. And it's not the tsunami, but, you know, Waianae area is known for getting hit by hurricanes, also. So, I am supporting the project.

August 6, 2015

Ms. Lei Learmont
[redacted]
Wahiawa, HI 96781
[redacted]

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Learmont:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments in support of the project. Your comments have been excerpted from the transcript of the meeting and assigned identification number P009. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MR. BLAKE MCELHENY (first comment):

I'm a resident of Pupukea. So sorry to get here late, so this may have already been covered, but I think from a resident's perspective, my limited understanding as a lay person is that if you use something like biodiesel, that potentially the emissions could be less harmful to the environment, but your written documents probably have some details on the differences there. But given the large number of agricultural lands and the large acreages, it would make sense, from our community's perspective if -- maybe it's already been documented, that you guys are going to work with Pacific Biodiesel or someone like that, then why not grow the fuel in the region, if possible, rather than rely on imports.

So I apologize if that's already been dealt with, but I just feel like, my from limited knowledge, that, potentially, is cleaner burning, and then also that idea of maybe growing the fuel closer by, if they're able to develop some kind of feed stopper, whatnot, that they can grow and integrate, and however else they're doing that biodiesel production, but I appreciate the opportunity and I'll review the materials more.

Thank you for the opportunity.

August 6, 2015

Mr. Blake McElheny
[redacted]
Haleiwa, Hawai'i 96712

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. McElheny:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments regarding the project. Your comments have been excerpted from the transcript of the meeting and assigned identification number P010. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

Regarding your question about biodiesel emissions compared to other fuel sources, please see section 3.4.2.1.2 of the draft EIS. This section presents three operational scenarios that provide a comparison between (1) 100 percent biodiesel, (2) 50 percent biodiesel and 50 percent diesel, and (3) 50 percent biodiesel and 50 percent LNG. While scenarios 1 and 2 have the same emissions profile for criteria pollutants and hazardous air pollutants, scenario 1 (100 percent biodiesel) would emit substantially less greenhouse gases (GHG). Scenario 3 would have the lowest criteria pollutant emissions and the highest hazardous air pollutant emissions, and produce less GHG than scenario 2, but more GHG than scenario 1.

Regarding your question about biofuel for the generating station being grown in the region, if a biofuel supply becomes locally available, Hawaiian Electric could purchase the fuel through its competitive procurement process. To address how Hawaiian Electric procures biofuel, the final EIS will include a discussion of the Environmental Policy for Hawaiian Electric Companies' Procurement of Biofuel from Sustainably Produced Feedstock, prepared by Hawaiian Electric Company and the Natural Resources Defense Council, as revised August 2013. The policy provides that Hawaiian Electric will purchase biofuels only from suppliers that comply with the Roundtable on Sustainable Biomaterials (formerly the Roundtable on Sustainable Biofuels) ("RSB") Principles & Criteria for agricultural, end-of-life, and wastewater feedstock or similar certifications.

In addition, the following additional text has been added to section 2.2.1.5 of the EIS:

"One of Hawaiian Electric's goals remains to reduce Hawaii's dependence on imported fossil fuel and the adverse environmental and economic impact of burning fossil fuel to generate electricity for residents and visitors to the Hawaiian Islands. A transition from petroleum fuels to biofuels derived from sustainably-produced and preferably locally-sourced feedstock offers potential for near-term reductions in GHG emissions and increased security from continuing oil market price volatility and potential supply interruptions. Hawaiian Electric maintains a biofuel purchasing policy that was developed in cooperation with the National Resources Defense Council (NRDC) in 2007 and updated in 2013 (Hawaiian Electric 2013). This policy outlines Hawaiian Electric's preference for procurement of locally sourced biofuel and their requirements for obtaining biofuel generated from sustainable sources. The policy includes a section on local feedstock support mechanisms that discusses Hawaiian Electric's support for development of local biofuel producers and a section on sourcing requirements for biofuel that requires third-party certification of biofuel sourcing. A copy of the policy has been included as Appendix B."

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MR. MARCUS OSHIRO, State Representative for District 46:

I'm standing in support of this project. It's something that makes sense. I've had a private briefing about a month and a half ago on base with the Colonel, and it just makes sense to have a backup generator, 50 megawatts, out of the tsunami zone. Right now we have Kahe and Waiau, both near the shoreline. And like Ms. Learmont mentioned, it's prone to hurricanes, tsunamis, rising tidal waters, so I think that it makes sense.

And, number two, it's a biofuel plant. And for those of you who understand what we're trying to do in Hawaii, to lessen our dependence from fossil fuel, this cogeneration-type facility gives us or enables us the opportunity to maybe grow our own and produce our own fuel here, on the nearby ag [agricultural] lands on Oahu, Central Oahu, and North Shore.

I also think the benefit for the nearby community, should Waiau or Kahe go down, even Honolulu go down, we'll have an opportunity to restart the system, the grid. And I think Wahiawa, Mililani, Kunia, maybe even the North Shore would also benefit from having close proximity to the new facility.

So I look forward to it. I'm supporting it, and I will be submitting further written comments accordingly.

Thank you.

August 6, 2015

The Honorable Marcus R. Oshiro
Representative District 46
State of Hawai'i
State Capitol, Rm. 424
Honolulu, Hawai'i 96813

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Oshiro:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments in support of the project. Your comments have been excerpted from the transcript of the meeting and assigned identification number P011. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MR. BLAKE MCELHENY (second comment):

I believe that the way that U.S. Army Garrison-Hawaii can get HECO or whoever it's going to end up being, to utilize the biodiesel would be through the lease agreement. And so I guess from the public's point of view or a member of the public, advocate that U.S. Army Garrison-Hawaii is firm in those lease negotiations that the fuel source is the biodiesel and that if it's capable of more than the 50 percent that may be into the lease agreement, could be written that there's incremental movement towards a hundred percent, because it seems like Department of Defense's overall policy goals is to use as much renewables as possible, and I think the public stands behind that, for a variety of reasons, public health and natural environment and whatnot.

And so I would just appreciate it being in the record that maybe that's a way that the public and U.S. Army Garrison-Hawaii can hold HECO or whoever the eventual utility is, hold their feet to the fire in that regard as to the lease terms, and I think that's a good idea.

Thank you.

August 6, 2015

Mr. Blake McElheny
[redacted]
Haleiwa, Hawai'i 96712

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. McElheny:

Thank you for providing additional oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments regarding the project. Your comments have been excerpted from the transcript of the meeting and assigned identification number P012. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

Regarding your comments on the use of biofuel, the requirement for continued use of biofuel will be in the lease and in the Public Utilities Commission's Decision and Order to Hawaiian Electric. As stated in section 2.2.1.5 of the draft EIS: "The Army and Hawaiian Electric have agreed that at least 50 percent of the fuel used by the generating station will be biofuel, and that the generating station will use a minimum of 3.5 million gallons per year of biofuel."

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

ORAL PUBLIC COMMENT

WAHIAWA PUBLIC MEETING

May 21, 2015

MR. THORA-J KEAUNUI CUARESMA:

P013a

Okay. And, actually, I'm -- kala mai ia`u ai [apologizing]. I apologize for my lateness and I'm not sure if the questions or concerns that I'm going to raise have already been addressed, but I know the other night at the neighborhood board meeting, we asked -- there was someone in the audience that asked about how many megawatts of power, and I think you said 50 megawatts or power is what you would be generating it, and do you really need it; and if you don't need it, then why are we having it. And if I recall correctly, you said that we were not really in need of it, but it is something I guess we're planning for the future.

And I think he also asked you how many watts. And you can correct me on the terminology, but I think you said you only needed 32 megawatts of power. And this generator, if I'm not mistaken you said, was going to be capable of generating or storing 50 megawatts of power.

So, again, my question on his behalf, and, actually, he's on his way, also, is, if we don't need it, then why are we actually going forward with it? And if we are going to continue to go forward with it, why do we have something that is so big? And, actually, we already have the windmills up in Kawailoa. And, if I'm not mistaken, those windmills were put in place to also generate an alternative source of energy.

P013b

So I guess the whole thing with the windmills and the way the windmills have impacted Kawailoa and that area, not only environmentally but also just esthetics, it has just -- it's an eyesore. I grew up there, on that ridge above Waimea. And the fact that there are two dozen windmills or 30 windmills up there, is that how this project, which are 37 poles, your 37 utility poles that will come up rather than have the utility lines run underground, is that going to impact our view, as well?

So, I know, there's a whole lot of questions in there, but I figure you folks had some heads-up the other night when we asked those questions, so I am hoping that maybe you have little bit more prepared answer to our concerns.

Thank you.

August 6, 2015

Ms. Thora-J-Keaunui Cuaresma
(No contact information provided)

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Cuaresma:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Wahiawa on May 21, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments. Your comments have been excerpted from the transcript of the meeting and assigned identification number P013. The two questions asked in your statements have been annotated with reference numbers P013a and P013b. The excerpted comments will be included, along with this response letter in appendix A of the final EIS.

***Comment Responses** (listed by reference number)*:

P013a. At the Wahiawa neighborhood board meeting on May 18, 2015, the question was asked whether there is adequate generating capacity on O'ahu at the current time to meet customer demand. The answer to that question was (and still is) yes, there is adequate generating capacity on the island to reliably meet current demand. However, as also was stated, the existing portfolio of electrical generators on the island will require replacement as they age. The commissioning of the SGSP would enable Hawaiian Electric to deactivate Waiau Unit 3 or Unit 4, both of which are oil-fired boiler units placed into service in 1947 and 1950, respectively. Although they are reliable and well maintained, the units are reaching the end of their useful life. By replacing them with new flexible generating units like those proposed for the SGSP, Hawaiian Electric will increase the reliability and efficiency of the grid, reduce fuel consumption and air emissions, and enhance our ability to incorporate more renewable energy like wind and solar into the grid.

Regarding why the SGSP will be a 50 megawatt (MW) facility, Hawaiian Electric and the Army have determined through extensive analysis that a facility of that size is required. There are several reasons for this determination:

1. The Army's peak power demand (i.e., the most power the three installations required at one time) is 32 MW. To be able to meet the Army's power reliability requirements—and, therefore, not have to make rent payments for the land, the savings of which are passed on to Hawaiian Electric customers—Hawaiian Electric determined that some 50 MW of machines would be required so that in the event that one machine was down for maintenance and a second machine failed to start, the SGSP could still provide the required power.

2. Hawaiian Electric also required that—even in the event that the SGSP was meeting the maximum 32 MW demand of the Army—the facility would have adequate additional capacity to provide power to our other customers and still provide enough power to restart the grid in the event of any outage.
3. To allow the deactivation of Waiau Unit 3 or 4—which are about 50 MW each—analysis showed that a new 50-MW station would be required.
4. Finally, due to economy-of-scale considerations, larger facilities cost less to build than smaller facilities when compared to their output. That is, although the total cost of a 50 MW facility is more than a 32 MW facility, the cost in $/MW is less. A 50 MW facility actually saves customers money over a 32 MW facility. In fact, Hawaiian Electric would have saved customers money by building an even larger facility, but site restrictions limited the size of the facility to 50 MW.

Regarding the windmills in Kawailoa, they provide a valuable contribution to the state's renewable energy goals. Their output, however, is dependent upon the weather, just as the output of solar photovoltaic panels is dependent upon the sun. In order to provide reliable and renewable electrical power, a mix of different types of generators is required. The SGSP would provide "firm" generating capacity—meaning that it would be under the control of the operators—and it would provide power independently of the weather and time of day. The Kawailoa wind farms do not meet all of the Army's or Hawaiian Electric's requirements, as discussed in sections 1.3, 1.4, and 2.4 of the EIS.

P013b. As part of Hawaiian Electric's application to the Public Utilities Commission (PUC) for approval of the Schofield Generating Station Project in Docket 2014-0113, the company analyzed options for overhead versus underground transmission lines. The analysis showed that placing the lines underground would result in an estimated $15 million higher cost than placing them overhead. Based on the company's goal of reducing customer costs, the application recommended placing the line overhead.

As required by Hawai'i state law (Hawai'i Revised Statutes 269-27.5), the PUC held a public hearing on this issue on January 21, 2015, to determine if the public had concerns about the placement of the 46kV lines overhead versus underground. The hearing was also attended by a representative of the Division of Consumer Advocacy. No objections to the proposed overhead lines were heard.

The decision as to whether the transmission lines would be placed overhead or underground rests with the PUC. If you wish to express your opinion that the transmission lines should be placed underground to the greatest extent possible, Hawaiian Electric respectfully suggests that you address your concerns to the PUC (http://puc.hawaii.gov/) and/or the Division of Consumer Advocacy (http://cca.hawaii.gov/dca/) as a "public comment" to Docket 2014-0113.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

P014

ORAL PUBLIC COMMENT

MILILANI PUBLIC MEETING

May 20, 2015

MR. RON GUNDERSON:

I am a little nervous. However, I would like to voice my disapproval of the draft EIS, mainly for a couple of reasons. I'll try to be somewhat brief and I will provide a written copy. 1 But the basis of it is the water usage for it, I think, is extravagant. At seven gallons a minute, that's 400 gallons a day. You know, 400 gallons a day over a month is just huge. It's coming out of our aquifers. All that water just goes back as runoff and it's gone and here we have just a minor adverse effect due to water resources. It seems a little low in effects. P014a

One of the other requirements was that for HECO at -- for the Oahu public, myself, at $170 million, I should be getting something out of this station, and I'm not going to be getting a whole lot out of it because the military is going to take 70 percent of the power. They need 35 kilowatts -- or megawatts of that power to power their structure. I'm going to get 30 percent, or about 15 kilowatts, and I'm just not getting a bang for my buck as a civilian. P014b

The other thing about it is that the military and HECO haven't come up with any -- whatever contingency problems there would be that would require the military to take all the power. I certainly am in agreement with having a power plant outside of the ocean area. However, the military is going to take all the power, leaving only 15 megawatts for the general population, because in your scenario all of the surrounding coastline has been destroyed by a tsunami or whatever has happened. P014c

I'm also a little concerned -- excuse me -- with the fuel sources -- with the fuel source. This is supposed to be an alternative fuel source generating plant, and here recently the state has said that we're not even going to put biofuels in our fuel anymore; for cars we're not even doing it. P014d

I don't know where you're going to come up with biofuel for this plant, to run it on. The only thing left is either regular oil, oil or natural gas. And they came out recently, in the last month, and said that natural gas may not be the fuel of the future for the state. So it seems to me that you're just trying to string people along, saying you have a renewable resource here, when we don't have anything. We're going to be running gas and oil, and we have no way of knowing how much of the oil you're actually generating -- using up there at this plant, whether you're actually using any alternative fuel source at all.

The last one I'd like to bring up is the use of -- you said the power, once again, to power Wheeler Army Airfield in the event of emergencies. And Wheeler is -- while it accepts helicopter traffic just fine; it certainly doesn't accept large aircraft. It's certainly not a 24-hour airport, and the instrument approaches into it are terrible. And when we take all this power from the generating plant to give to the military to power this up -- the military already has generating capacity on their installation for emergencies. So what we're powering is not critical infrastructure. They already have that available to them in their own contingency generating plant such as at the station up there at Kunia and other places on Schofield itself. I would imagine that the headquarters has their own emergency generator ready to go when the lights go off. P014e

But I thank you for your time and consideration on this. Thank you.

August 6, 2015

Mr. Ron Gunderson
[redacted]
Mililani, HI 96789

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Gunderson:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Mililani on May 20, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments. Your comments have been excerpted from the transcript of the meeting and assigned identification number P014. As your statement included detailed comments on the draft EIS, we have annotated each comment with a reference from P014a to P014e. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

Comment Responses *(listed by reference number)*:

P014a. Section 2.2.1.6 of the EIS discusses the water supply for the SGSP and the estimated use. This section states that, when the facility is operating at maximum capacity, the water usage would be approximately 340 gallons per hour. Section 2.2.3 discusses how many hours per day the facility is expected to operate: approximately 3.25 hours per day. The EIS analyzes both expected operation (3.25 hours/day) and maximum operation (24 hours/day) scenarios. Therefore, the expected water use of the facility is approximately 1,100 gallons per day (gpd), and the maximum water use is approximately 8,160 gpd.

To provide a frame of reference, the U.S. Environmental Protection Agency and the Hawai'i Department of Land and Natural Resources estimate that the average family of four uses 400 gpd of water. Therefore, the SGSP's expected water usage of approximately 1,100 gpd is less than the expected water usage of three average households.

It is difficult to accurately compare water use between the SGSP and other existing power plants, because the sources of water and the ways in which the water is used are different for different designs. However, Hawaiian Electric estimates that existing steam turbine generating stations require an average of

approximately 53 gallons of water to produce 1 megawatt-hour (MWh) of electrical energy. In comparison, the proposed SGSP would require approximately 6.8 gal/MWh. From this perspective, shifting to the technology that the SGSP uses would conserve water, compared to continuing to use existing steam turbine technology.

To address your comment, the following language has been added to section 3.7.2.1.2 of the EIS to clarify the water usage of the plant during operations and the resulting environmental effects:

> "Based on the anticipated operation of the SGSP, the generating station would use approximately 1,100 gallons of water per day. If operated at maximum capacity continuously, the generating station would use approximately 8,175 gallons of water per day. For comparison purposes, the U.S. Environmental Protection Agency and the Hawai'i State Department of Land and Natural Resources estimate that the average family of four uses 400 gallons of water per day. Therefore, the SGSP's expected water usage of approximately 1,100 gallons of water per day is less than the expected water usage of three average households.
>
> Potable water for the generating station would be drawn from the Schofield Shaft of the Central Sector of the Central Oahu Aquifer and would be part of the Army's permitted use. The Army's total permitted use is 5.648 mgd from the Schofield Shaft. As of March 2015, the Army's actual usage was 3.159 mgd (Bogdanski 2015). Therefore, even though the plant would use additional potable water, the Army's water use would remain well below its permitted use, so effects would be minor."

Regarding your comment about runoff, as stated in section 2.2.1.6, potable water would primarily be required to make the urea solution needed for the selective catalytic reduction emissions control system and would be released from the exhaust stacks as water vapor, rather than going into the sewer or stormwater system. Other minor water uses would include periodic additions to the air radiator cooling system and on-site fire water tank, washing down equipment, watering landscaping, and providing water for drinking, cleaning (i.e., sinks, toilets, and showers), and eyewash stations for the station's staff of three people per shift. Water from these uses would be directed into the sewer or storm water system as appropriate. Stormwater would be managed to minimize runoff as described in draft EIS section 3.7.

P014b. Providing energy security to the Army's facilities is one of the many purposes of the project. The other purposes, which benefit all Hawaiian Electric customers, are discussed in sections 1.3 and 1.4 of the EIS, and further detailed in Hawaiian Electric's application to the Public Utilities Commission (PUC) in Docket 2014-0113.

The project will provide electrical power to all Hawaiian Electric customers during normal operations, which are expected to be the vast majority of the project's 30-year life. In the event of specific contingencies, the project will have the capability to provide power directly to the Army's installations, thereby providing an energy security guarantee to the Army that will serve as in-kind consideration in lieu of lease rent payment for the life of the project. The Army also is contributing financially to the up-front development costs of the project.

When the SGSP is providing power directly to the Army during a contingency—and *only* during those limited periods—the guarantee is that Hawaiian Electric will provide *up to* 32 MW from the SGSP. This amount of power was determined based on the Army's *peak* historical demand and is not indicative of how much power the Army bases normally demand, or would demand in the event of an outage, which would be significantly less.

Detailed analyses of the costs and benefits of this arrangement are provided in PUC Docket 2014-0113 and show that the agreement is anticipated to save Hawaiian Electric's customers more than $12 million over the life of the project. Based on the merits of the project and the cost and benefits to the residents of

O'ahu, Hawaiian Electric is seeking permission from the PUC to recover, via revenue from its customers, the project costs that are not provided by the Army.

P014c. As stated in P014b, the Army could require *up to* 32 MW of the output of the SGSP under circumstances of prolonged outage, such as a natural disaster or a threat to the Army's military mission. Even in the most extreme case, the Army bases do not have enough electrical equipment to "take all the power."

In the scenario of a natural disaster causing a prolonged outage—which is anticipated to be very rare—the capacity of the SGSP above the Army's demand at any given time (which would be a minimum of 18 MW and usually more) would be available for other uses. Depending on the circumstances, the capacity could be used to provide power to the Wahiawa community or to provide startup power to other Hawaiian Electric generating units at Waiau Power Plant, which could then restore the O'ahu grid.

When considering the value of the SGSP to the general population in the event of a disaster, the reliable electrical power it supplies to the Army and National Guard units, including the aviation units resident at Wheeler Army Airfield, should be considered. Their disaster response capabilities would be enhanced, providing a significant benefit to all O'ahu residents and possibly to the neighbor islands as well.

Finally, it should be noted that the Army has a vested interest in using the SGSP's capabilities to restore the entire O'ahu grid as expeditiously as possible, in order to support its numerous other facilities on O'ahu in addition to the three bases near the SGSP (including Tripler Army Medical Hospital).

P014d. Hawaiian Electric has been using biofuels in bulk for electrical power generation since 2009. During the last 6 years, the company has not experienced a shortage in biofuel suppliers or biofuel itself and does not anticipate a shortage in the future. In fact, the production capacity of local biofuel suppliers has increased over the last several years, which increases the chances that the company will be able to contract for a reliable, cost-effective, and local biofuel source for the life of the SGSP.

If approved by the PUC, the SGSP is proposed to have a required minimum biofuel use. Hawaiian Electric currently provides—and will be required to continue to provide—annual reports to the PUC that detail biofuel usage and renewable energy generation. To find out how much biofuel the company is using and how much renewable energy the company is producing from all renewable sources, you can access Hawaiian Electric's reports on the PUC's website.

P014e. In an emergency, the Army and other emergency responders would work to safeguard national interests and U.S. citizens. Properly coordinating response efforts would require powering Schofield Barracks, Field Station Kunia, and Wheeler Army Airfield. Also, in the event that other O'ahu airports were compromised, Wheeler Army Airfield could serve important air response functions, including use by large fixed-wing aircraft. As stated in section 1.4.1:

> "Maintaining power at the Wheeler Army Airfield during extended outages would benefit Oahu residents if there was a civil emergency or natural disaster by enabling critical support from the Army's first responders. Providing reliable power to the Army's centrally located airfield make it a good choice for use by the Federal Emergency Management Agency and other disaster responders, particularly if the coastal areas are compromised."

The Army already has emergency backup generators for key services and buildings on its installations (see section 3.13.1.2); however, they run on diesel fuel, do not power all Army services, and are not connected to the island-wide grid, so cannot provide power to the citizens of O'ahu. The SGSP would provide a cleaner fuel option for emergency power generation that would also serve the citizens of O'ahu during normal conditions. Since emergency conditions during which the Army would exercise its first

call to power are exceedingly rare, most of the time the SGSP would provide power to all the citizens of O'ahu via the island-wide grid.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

ORAL PUBLIC COMMENT

MILILANI PUBLIC MEETING

May 20, 2015

MS. MIRIAM CHRISTINE PETERS:

P015a

I was just wondering -- you brought up in the Neighborhood Board meeting the other night that there's a possibility of 100 percent requirement for renewable energy, and I was wondering if any of your plans involve that, that change, because it's going to come pretty soon. So if whatever you drafted is only good for 65 percent, what kind of additions do you need to meet or make in order to hit that and is it where those places -- Because any time you think about building on the lands, you just -- everything over here is supposed to be historic. Apparently, you guys met with historic and cultural preservation, and so I assume that the place you guys are surveying is not -- you know, it's not going to affect culturally. But if for some reason you need to expand and we're already in the process of approval or you guys building eventually, are you guys -- is there a possibility of a big expansion, and will that conflict with cultural or historical preservation?

...

P015b

And then based on that, because you're not too sure -- I mean, I know Wahiawa is pretty historic, period, but I'm not too sure about Kunia, and because we just came to light of this, I was wondering if there was any way that you guys could make some kind of extension for the commentary period for the proposal.

That's it. Thank you.

August 6, 2015

Ms. Miriam C. Peters
[redacted]
Wahiawa, Hawai'i 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Ms. Peters:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Mililani on May 20, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments. Your comments have been excerpted from the transcript of the meeting and assigned identification number P015. As your statement included detailed comments on the draft EIS, we have annotated your comments with reference numbers P015a and P014b. The excerpted comments will be included, along with this response letter, in appendix A of the final EIS.

Comment Responses *(listed by reference number)*:

P015a. The Schofield Generating Station can operate on up to 100 percent biofuel as designed, so it would be unnecessary to expand the plant in order to use 100% biofuel.

Any future expansion outside of the existing footprint or significant additional construction of facilities inside the footprint would be subject to NEPA and coordination with the State Historic Preservation Division.

P015b. U.S. Army Garrison-Hawai'i and Hawaiian Electric have met and exceeded public involvement and notification requirements for the proposed project. To keep the community apprised of the development of the project and the EIS, U.S. Army Garrison-Hawai'i and Hawaiian Electric published notices in federal and state publications; distributed notices by mail; held public meetings; reached out to area elected officials, neighborhood boards, and community leaders; and provided project information to 19 libraries and online at http://www.garrison.hawaii.army.mil/schofieldplant/.

The EIS was made available for a full 45 days per the requirements of NEPA (40 CFR 1506.10(c)) and Hawai'i Revised Statutes Chapter 343, Environmental Impact Statements. The comment period will not be extended.

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
Ms. Kathleen Ahsing, Army Office of Energy Initiatives

P016

ORAL PUBLIC COMMENT

MILILANI PUBLIC MEETING

May 20, 2015

MR. FRED ASMUS:

I went to the Neighborhood Board meeting the other night, and this is the first I heard of the project, and I think a lot of the people that I live -- my neighbors didn't know anything about it either. But, you know, I'm not saying we could have gotten more public relations outside to the people so we would have known about this. But I've got a few questions -- a couple of questions. I notice the poles -- it seems like there's gonna be a lot of poles necessary for the project. I'm just wondering -- poles is kind of old-fashioned. Can we go underground? I know it's about money, but it's time to spend some money, I guess. P016a P016b

Another thing is we just had an accident out in Kaneohe -- or Waimanalo, involving a military aircraft. Any aircraft -- it doesn't matter. But I've been living out here for a long time. I know Wheeler's kind of in the flight path of this project, I believe. So I'm just kinda concerned about -- I'm sure there's FAA gonna look into it and all that. But kind of concerned about that, that question, the placement of the project. P016c

And I think that's about it. I mean, I don't know really if it's beneficial for the community or not. Like I said, this the first I've found out, so I haven't really got to study it.

Anyway, those are two of my questions.

August 6, 2015

Mr. Fred Asmus
[redacted]
Wahiawa, HI 96786

Subject: Schofield Generating Station Project:
Draft Environmental Impact Statement Comment Response

Dear Mr. Asmus:

Thank you for providing oral comments regarding the draft environmental impact statement (EIS) for the Schofield Generating Station Project (SGSP) at the public meeting held in Mililani on May 20, 2015. This is a joint EIS, which meets the requirements of both federal and state law. Hawaiian Electric Company is the applicant under the state EIS process and—in accordance with the requirements of the Hawai'i Environmental Policy Act (HEPA) (Chapter 343, Hawai'i Revised Statutes) and its implementing administrative rules (Hawai'i Administrative Rules, Chapter 11–200)—is responding in writing to all comments received on the draft EIS. All comments and responses will be incorporated into the final EIS per the requirements of HEPA and of the National Environmental Policy Act (NEPA) [42 United States Code § 4321 to 4370f] and NEPA regulations [Title 40 of the *Code of Federal Regulations* (CFR) Parts 1500–1508], as well as Council on Environmental Quality implementing regulations and 32 CFR Part 651, Environmental Analysis of Army Actions.

We appreciate your taking the time to attend the meeting and to provide comments. Your comments have been extracted from the transcript of the meeting and assigned identification number P016. As your statement included detailed comments on the draft EIS, we have annotated each comment with a reference number from P016a to P016c. The extracted comments will be included, along with this response letter, in appendix A of the final EIS.

Comment Responses *(listed by reference number)*:

P016a. U.S. Army Garrison-Hawai'i (USAG-HI) and Hawaiian Electric have met and exceeded public involvement and notification requirements for the proposed project. To keep the community apprised of the development of the project and EIS, USAG-HI and Hawaiian Electric published notices in federal and state publications; distributed notices by mail; held public meetings; reached out to area elected officials, neighborhood boards, and community leaders; and provided project information to 19 libraries and online at http://www.garrison.hawaii.army.mil/schofieldplant/.

P016b. As part of Hawaiian Electric's application to the Public Utilities Commission (PUC) for approval of the Schofield Generating Station Project (Docket 2014-0113), the company analyzed options for overhead versus underground transmission lines. The analysis showed that placing the lines underground would result in an estimated $15 million higher cost than placing them overhead. Based on the company's goal of reducing customer costs, the application recommended placing the lines overhead.

As required by Hawai'i state law (Hawai'i Revised Statutes 269-27.5), the PUC held a public hearing on this issue on January 21, 2015, to determine if the public had concerns about the placement of the 46kV lines overhead versus underground. The hearing was also attended by a representative of the Division of Consumer Advocacy. No objections to the proposed overhead lines were heard.

The decision as to whether the transmission lines would be placed overhead or underground rests with the PUC. If you wish to express your opinion that the transmission lines should be placed underground to the greatest extent possible, Hawaiian Electric respectfully suggests that you address your concerns to the PUC (http://puc.hawaii.gov/) and/or the Division of Consumer Advocacy (http://cca.hawaii.gov/dca/) as a "public comment" to Docket 2014-0113.

P016c. Section 3.2.2 of the EIS addresses environmental consequences to airspace. As stated in section 3.2.2.1:

> "No significant impacts on airspace would be expected if the Proposed Action is implemented. Neither construction equipment nor the generating station structure would create an obstacle to air navigation or adversely affect military and civilian aviation operations. The two exhaust silencer stacks at the generating station would be approximately 95 feet above ground level, and transmission poles would be 60 to 80 feet above ground level. Some construction equipment used to build these structures would be slightly taller. The height of these structures and their proximity to Wheeler Army Airfield was a critical consideration informing the project design throughout the process."

The section also details the notification and coordination requirements among Hawaiian Electric, the Army, and the Federal Aviation Administration. Section 3.2.2.1.1 of the EIS further states:

> "The site layout design and all construction operations (including equipment operation) would have to meet the airfield clearances and other requirements of UFC 3-260-01, Airfield and Heliport Planning and Design. Hawaiian Electric, USAG-HI, and Wheeler Army Airfield Aviation Safety would work together to resolve any project design or construction issues that could affect Wheeler Army Airfield flight operations and to make sure the plan conformed to UFC 3-260-01. Any issues would be satisfactorily resolved before construction to minimize impacts on airports and airfields, navigable airspace, and flight routes and flight patterns."

We will notify you when the final EIS is available. In the meantime, if you have any questions or would like to discuss the project further, please call me at 808-543-4088.

Sincerely,

Jack Shriver
Senior Engineer
Generation Project Development
Hawaiian Electric Company

cc: (via email only)
Mr. Alex Roy, Office of Conservation and Coastal Lands, Hawai'i Department of Land and Natural Resources
Ms. Stefanie Gardin, Office of Public Affairs, U.S. Army Garrison—Hawai'i
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