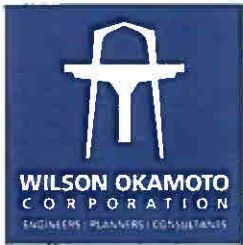


8301-01
November 2, 2012



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Mr. Tom Berg, Councilmember
Honolulu City Council District I
City and County of Honolulu
Honolulu, Hawai'i 96813-3065
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RECEIVED

2012 NOV -2 P 12: 52

CITY COUNCIL
HONOLULU, HAWAII

Subject: Draft Environmental Assessment (EA)
University of Hawaii Pacific Health Research Lab
Portion of Tax Map Key: 1-9-1-13:045
Kalaeloa, Oahu, Hawaii

Dear Mr. Berg:

Thank you for your letter dated September 3, 2012. We acknowledge your interest in, and opposition to the University of Hawaii Pacific Health Research Laboratory (UHPHRL) project.

The Draft EA assesses the potential environmental impacts of the proposed action, pursuant to Chapter 343 of the Hawaii Revised Statutes. Specifically, the Draft EA assesses the potential environmental impacts of the proposed construction and operation of the UH PHRL as a facility, independent of variables beyond its intended operation. We acknowledge the numerous concerns voiced in your letter, however, many speak to issues beyond the scope of the Draft EA. Therefore, we offer the following responses in the respective order of your comments as they pertain to the Draft EA:

The PHRL Site is located in an area zoned F-1

The PHRL has never been planned, and would never serve, as a BSL-4 Laboratory. Furthermore, if the proposed BSL-3 laboratory were intended to be the first phase of developing a BSL-4 facility, then the entire project would need to be assessed in the EA process, since "segmentation" of a larger project in separate EA is not allowed. The current EA would not be valid for a BSL-4 facility at the proposed project site.

Bio Lab EA Statement about Site Choice

The Draft EA discusses alternative sites considered and the reasons they were dismissed. Community acceptance is a highly subjective criterion, and was not a consideration in dismissing the alternative sites.

Description Of Bio Lab Facility

We confirm your quoted description of the PHRL.

"Infectious" Biological Waste Products

As discussed in the Draft EA, the PHRL would be designed to maintain biological containment and would comply with standards set forth by International Building Code, NIH criteria, and the Biosafety in Microbiological and Biomedical Laboratories (BMBL) manual issued by the National Institutes of Health and the Federal Centers for Disease Control. The PHRL would include autoclaves for waste sterilization.

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Solid waste from the existing BSL-3 labs at the John A. Burns School of Medicine in Kakaako is brought to the H-Power Incineration Plant at Campbell Industrial Park, after waste is autoclaved. Waste from the PHRL will be disposed of in the same way. Wastewater disposal is provided by the City Department of Environmental Services. Wastewater flows are conveyed to the Honouliuli WWTP for processing.

Animal Holding Facilities

As discussed in the Draft EA, the existing wastewater infrastructure is sufficient to serve the projected needs of the proposed project.

Possible Terrorist Attacks

An EA is not intended to assess unpredictable scenarios such as acts of terrorism. Any proposed facility of any type could be subject to unpredictable acts of terrorism.

Weather and Climatic Effects

The proposed facility will conform to current flood regulations and building design standards pertaining to storm damage, including high winds. We are unaware of any evidence that recent storm events in the vicinity would suggest a need to re-evaluate those regulations and design standards.

Local approach flight path for Honolulu International Airport

Again, the EA process is not intended to assess unpredictable disaster scenarios. If aircraft crashes are a significant concern, the likelihood of such a risk occurring independently of the PHRL and affecting residences, schools, businesses and other occupied structures in the much larger adjoining area would be significantly greater than for the risk of a crash on a specific building housing a BSL-3 laboratory.

Special Bio Lab Air Filtering Systems

As discussed in the Draft EA, the PHRL would be designed to maintain biological containment and would comply with standards set forth by International Building Code, NIH criteria, and the BMBL. The discussion of HEPA filtration in the EA indicates that their efficiency is greater than 99.97% for particles both larger and smaller than 0.3 microns. In other words, for particles larger than 0.3 microns (which would include tuberculosis bacteria), HEPA filters remove more than 99.97% of particles. Likewise, for particles smaller than 0.3 microns (which would include West Nile virus and Dengue Fever virus), HEPA filters also remove more than 99.97% of particles. In addition to individual HEPA filter efficiency, the BSL-3 labs would have separate HEPA filters in the biosafety cabinets (part of the primary biocontainment system), and a separate HEPA filter in the lab exhaust (part of the secondary biocontainment system).

The incident you mentioned regarding the recent death of a lab worker in San Francisco was caused by a laboratory acquired infection to the worker while he was working in the lab. The pathogen that made him ill did not escape from the lab via the ventilation system, waste water system, or other lab system. He was working on a strain of meningitis for which there was no effective vaccine, and is responsible for thousands of deaths each year in the U.S. and throughout the world. He and his colleagues were working to develop an effective vaccine. It is important to note that no one outside the lab became ill due to his accidental infection.

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Section 106 Consultation initiated with SHPD in April 5, 2012

The Archaeological Literature and Field Inspection Report (June 2012) that was prepared for and appended to the Draft EA was reviewed by the State Historic Preservation Division (SHPD), which concurred in their letter dated September 7, 2012 that “no historic properties will be adversely affected. (See Attached).

The Section 106 consultation process provides the opportunity for consulted Native Hawaiian Organizations to recommend further consultation with potentially knowledgeable cultural informants.

Archaeological, Historic, and Cultural Resources

We acknowledge the legendary accounts relating to the broader Honouliuli Region, however, the potential impacts of the project on historic and cultural properties are defined as being those occurring within the Area of Potential Effect (APE). There does not appear to be any such impact identifiable in the information you offer.

Some Initial Bio lab EA Comments

The Final EA will include documentation of correspondence with the Department of the Interior (Fish and Wildlife Service), Department of Education, and the Department of Defense (Civil Defense) on the Draft EA.

Dean Capelouoto, Kapolei Resident, sent in these comments:

The Final EA will include documentation of correspondence with Mr. Capelouto.

Your letter, along with this response, will be reproduced and included in the forthcoming Final EA. We appreciate your participation in the EA review process.

Thank you for your consideration in this matter.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Dr. Vassilis Symos, Associate Vice Chancellor for Research, University of Hawaii at Manoa
Mr. Keith Mattson, Project Manager, University of Hawaii
Ms. Valerie Nottingham, Chief, Environmental Quality Branch, Division of Environmental Protection, Office of Research Facilities, National Institutes of Health