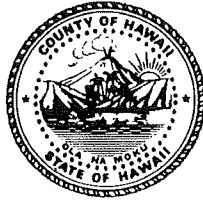


William P. Kenoi
Mayor



Duane Kanuha
Director

Bobby Command
Deputy Director

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PLANNING DEPARTMENT

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October 3, 2013

State Land Use Commission
Department of Business, Economic Development & Tourism
P.O.Box 2359 Honolulu, Hi. 96804

Attention: Mr. Orlando Dan Davidson
Executive Officer

RE: Second Draft Environmental Impact Statement (EIS) for KALOKO MAKAI

Tax Map Keys: (3)-7-3-09:017:025: 026: 028 and\06

Applicant: SCD – TSA Kaloko Makai, LLC
1100 Alakea Street, 27th Floor
Honolulu, Hawaii 96813
Attention: Mr. Jay Nakamura

Consultant: Wilson Okamoto Corporation – Engineers/Planners/Consultants
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Attention: Mr Earl Matsukawa, AICP

Dear Mr. Davidson,

The County of Hawai'i Planning Department offers the following comments concerning consistency with the Kona Community Development Plan (KCDP).

Kaloko Makai is located at the Kaloko Makai Village Transit Oriented Development (TOD) as indicated in the KCDP. The County of Hawaii Planning Department is pleased that the proposed development is following the basic concepts of the KCDP. Planning for compact walk able communities with mixed use development will help direct development away from purposely creating urban sprawl and will encourage development of new sustainable villages and towns.

The Planning Department's Design Center staff will review the Project District Application when submitted. The land use plans attached to the Draft EIS are conceptual only and were not considered to be part of this review. Thus this present evaluation did not include an analysis of the project's internal roadway layout and distribution of land uses, for consistency with the Smart Code principles and requirements embodied in the Village Design Guidelines, which are

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LAND USE COMMISSION
STATE OF HAWAII

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part of the KCDP. The analysis of consistency with Smart Code principles will occur in the future by the Planning Department's Design Center prior to Project District application submittal.

We offer the following comments on the submitted plans:

- Kaloko Makai is located in the Kaloko Makai Village TOD as depicted in the KCDP.
- We appreciate the use of transect zone description consistent with Smart Growth principles to identify density and uses of different areas in the project as this approach is consistent with the Kona CDP.
- Construction of this portion of Ane Keohokalole Highway, within the project site, will satisfy the CDP transportation concurrency requirements for this development. Note, that the design of the proposed merging of Hina Lani Street with the proposed 120 foot ROW in the makai portion of the site does not appear to be consistent with standard street intersection designs. In addition, the 120 foot ROW terminates at a double cul-de-sac providing no thru connections with other streets.
- Traffic design will be reviewed by Traffic and Engineering Divisions of the Department of Public Works, County of Hawai'i upon submission of the project district application.
- All of the subject parcels are outside of the Special Management Area (SMA) and will not require review against SMA rules and guidelines.
- With regards to Public Access in the proposed development, the main pedestrian corridor is identified as the Kohanaiki Trail. It runs generally mauka-makai (east-west) and has been identified as one of multiple significant historic sites on the properties. The project proposes a 10' wide trail with 10' wide open-space buffers on either side; cultural artifacts and native plants will be retained along the trail and corridor wherever possible. Previous land-clearing activities have largely destroyed the trail south of Hina Lani Street (outside of the proposed project area), and the Kohanaiki Trail now terminates along the southern border of the parcel identified by TMK (3) 7-3-009:017. In order to connect the extant portion of the Kohanaiki Trail on the subject properties to the Queen Ka'ahumanu Highway, the developer proposes a 30' green buffer immediately adjacent to Hina Lani Street, from the intersection of Hina Lani Street and Ane Keohokālole Highway makai to the intersection of Hina Lani Street and Queen Ka'ahumanu Highway. The buffer then follows the western border of the parcel identified by TMK (3) 7-3-009:017 and terminates at the northwestern property corner. The combined buffer and extant portion of the Kohanaiki Trail provide a pedestrian corridor for the entire depth of the proposed development. Figure 2-11 depicts the pedestrian corridor connecting or following very close to the proposed parks identified as P-2, P-3 and P-4. While Figure 2-11 depicts

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roadway access from the Kohanaiki Trail to the proposed 150 acre dryland forest preserve and the two trails proposed within the preserve, no green buffer is depicted that connects the two trail systems. An arterial green belt buffer in the vicinity of the zones identified as T5-3, T5-4, T5-5, T5-6 and T5-9 that connects the two trail systems may enhance the pedestrian experience and provide continuity of the trail system throughout the proposed development. It is anticipated that as the project develops further, appropriate locations for parking areas and comfort stations for park and trail users will be identified.

Again, the Planning Department of the County of Hawaii are pleased that the design concept for Kaloko Makai is following the concepts of the Kona Community Development Plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rob... Command", with the word "for" written below it.

DUANE KANUHA
Planning Director

TKD:tkd

\\coh22\Planning\Staff\Terry\KALOLO MAKAI EIS\Kaloko Makai Draft EIS on Letterhead.doc

Xc: Wilson Okamoto Corporation – Engineers/Planners/Consultants
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Attention: Mr Earl Matsukawa, AICP