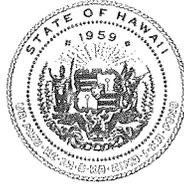


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IN REPLY REFER TO:

STP 8.1366

November 6, 2013

Mr. Daniel Orodener
Executive Officer
Department of Business, Economic
Development and Tourism
State Land Use Commission
P. O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Orodener:

Subject: Kaloko Makai
Second Draft Environmental Impact Statement (DEIS)
TMK: 7-3-009:017, 025, 026, 028 and 063

The State Department of Transportation (DOT) previously commented on the DEIS in letter STP 8.0545 dated September 20, 2011 (see Appendix S). However, modifications to the project in response to public comments resulted in this Second DEIS along with a Second Traffic Impact Analysis Report (TIAR). The most significant change relevant to traffic would be the reduction of the commercial/retail gross leasable area (GLA) from 1.1 million to 600,000 square feet. The Second TIAR also assumes (based on the County of Hawaii input to the developer) that Ane Keohokalole Highway would be extended from Hina Lani to Kaiminani Drive by 2028.

DOT now offers the following supplemental comments which are intended to serve as a broad overview of the subject project and its interaction with the State highways.

DOT Highways (HWY)

1. The traffic analysis study area along Queen Kaahumanu Highway should be extended southward past the junction with Kealakehe Highway. The project impacts appear to be significant and should be addressed. The 2045 project traffic volumes on Queen Kaahumanu Highway at Kealakehe Parkway in both north and south-bound directions represent between about 25 to 48 percent of the total 2045 through traffic in the AM and PM peaks. This level of project traffic probably requires that analysis and discussion be extended to at least include the Palani Road/Queen Kaahumanu Highway intersection.

2. To the north, the project contributes about 29 percent of the through traffic in both directions at Kaiminani Drive. This also indicates that analysis and discussion should extend northward at least to the Airport Access Road.
3. On Mamalahoa Highway, the analysis should be extended north to Kaiminani Drive, and south to Queen Kaahumanu Highway and Palani Road junction.
4. The intersection of Hulikoa Drive and Queen Kaahumanu Highway, currently a T-intersection, will eventually be reconstructed as a four-way signalized intersection. The TIAR does not reflect that change in the configuration. The makai leg of the intersection is expected to service a frontage roadway, Kohanaiki Way. This should be reflected and the shift in traffic should be accounted for in the analysis.
5. The TIAR should discuss and affirm that recommended improvements at Mamalahoa Highway and at Queen Kaahumanu Highway are feasible in the context of the project's development. A key assumption would be whether any actions by others (land, funds, etc.) would be necessary to carry out the improvement.
6. HWY has indicated that the future ultimate development of Queen Kaahumanu Highway is as a multi-lane full access-controlled highway with grade-separated accesses. The proposal for 2045, Phase 3 improvements of a grade-separated interchange at Hina Lani Street is desirable; however, it would need to be determined that it is technically feasible and that the Kaloko Makai developer would be responsible for the cost of the interchange. Technically feasible includes necessary right-of-way for the entire interchange not just what Kaloko Makai would reserve within its development.
7. Current HWY plans are to widen Queen Kaahumanu Highway to four-lanes from Kealakehe Parkway to the access to Kona International Airport. Kaloko Makai will be adding traffic to Queen Kaahumanu Highway. Given that Kaloko Makai will benefit from the increase in capacity and improvements along the current highway, the development should contribute to the widening and improvement project where it may reasonably benefit from the improvements based on its contribution to traffic volumes.
8. The Kaloko Makai Development shall be required to mitigate the local and direct traffic impacts resulting from the project, and participate on a fair-share basis in regional traffic impact mitigation.

Mr. Daniel Orodener
November 6, 2013
Page 3

STP 8.1366

9. HWY reserve further comment until the TIAR is updated for our review and acceptance. We make no judgment at this time on the adequacy or thoroughness of the TIAR.

DOT appreciates the opportunity to provide comments. If there are any other questions, please contact Mr. Norren Kato of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7977.

Very truly yours,



GLENN M. OKIMOTO, Ph.D.
Director of Transportation

c: Jay Nakamura, Stanford Carr Development – TSA International (SCD-TSA) Kaloko Makai,
LLC
Earl Matsukawa, Wilson Okamoto Corporation