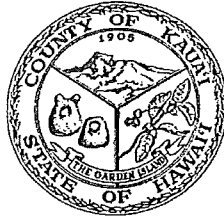


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Mayor



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PLANNING DEPARTMENT

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JUN 18 2015

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LAND USE COMMISSION
STATE OF HAWAII

Mr. Peter T. Young
Hookuleana LLC
1539 Kanapuu Drive
Kailua, Hawai'i 96734

**RE: A11-791 HG Kaua'i Joint Venture
Kapa'a Highlands II
Comments on the Draft Environmental Impact Statement (DEIS)**

Dear Mr. Young:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the State Land Use District Boundary Amendment Petition to the State Land Use Commission for HoKua Place (HG Kaua'i Joint Venture, LLC) which is located on a portion of TMK (4) 4-3-003:001 in the East Kaua'i Planning District.

According to the DEIS, the petition area, named "HoKua Place", is sited on 97 acres located on a bluff mauka of the existing Kapa'a Town Core and adjacent to the Kapa'a Middle School. The area is hemmed by Olohena Road, the Temporary Kapa'a Bypass, and an agricultural subdivision, "HoKua Agriculture Lots." The initial plans show a predominantly residential development characterized by large pockets of single family (86 lots) and multi-family dwelling units (683 units). The County's affordable housing requirements will be fulfilled onsite. The plans include limited space for complementary commercial uses. The public facilities include land for a police/fire station and 14.3 acres of open space, including greenways and a 3.1-acre park. The project area is designated State Land Use District – Agricultural and zoned "Agriculture" by the County.

Based on the DEIS, the Planning Department has the following comments and concerns, primarily in relation to the County's long range plans and land use policy initiatives:

Consistency with the General Plan Update (2000)

Thank you for providing statements addressing how the project conforms to existing County long-range plans. By County Charter, the General Plan guides the future physical development of the County and is adopted by ordinance. The Kaua'i County Code states

utilize extensive public input and new data to amend the existing General Plan's vision, policies and maps.

In May 2015, the public process for the General Plan Update was initiated with multiple Island-wide events and meetings. The planning department received a large number of comments related to traffic congestion throughout the Kapa'a-Wailua corridor and the desire to limit future growth until vehicular level-of-service improves. The applicant should be aware that these public comments, along with other public concerns, will factor into the discussion regarding potential General Plan land use map amendments. The FEIS should acknowledge that the General Plan Update is underway and could result in General Plan land use map amendments.

In Section 4.8, Socioeconomic Conditions & Public Service Facilities, please utilize information from the General Plan Technical Study: Socioeconomic Analysis and Forecast (2013) in the discussion of population growth and housing demand. This technical study was prepared for the ongoing General Plan Update and provides regional population and housing allocation forecasts for all six planning districts, including the East Kaua'i Planning District. It is a foundation study for the ongoing General Plan Update process and will be utilized in General Plan policy discussions related to growth and land use map amendments.

Community Plan Consistency

In several places, the DEIS incorrectly states that HoKua Place is consistent with the Kapa'a Town Development Plan and the Kapa'a-Wailua Basin Community Plan.

The existing development plan for the area, the Kapa'a-Wailua Development Plan, focuses on the Kapa'a Town Core and does not address regional growth nor touch on future plans for the project area. Despite the age of the plan, which was adopted in the 1970s, this is the correct plan to reference when addressing consistency with the regional plan.

The Planning Department has been working on an update of the Kapa'a-Wailua Development Plan (also known as the East Kaua'i Community Plan) for several years. This plan is not yet in public draft form and cannot be considered when addressing consistency with the project area's regional plan. However, it would be appropriate to mention that the planning process is ongoing. Unfortunately, the Planning Department cannot provide a clear timeline for project completion as the project's status is under review by County Administration.

There is no existing or draft Kapa'a Town Development Plan. A Kapa'a Town Urban Design Plan was submitted as part of the Mayor's Annual Budget Submittal to Council (FY2015-16), but it was not included in the final annual budget. Please exclude mention of this plan from the Final Environmental Impact Statement.

Consistency with recent plans and policy initiatives

Complete Streets (2010) and Complete Streets Subdivision Ordinance (2013)

The County's Complete Streets Policy requires that new projects safely accommodate travel by pedestrians, bicyclists, public transit, and motorized vehicles. Therefore, we appreciate the inclusion of active transportation design in the initial project concepts and the

acknowledgement of the positive health impacts when such infrastructure is carefully integrated into community design. However, the conceptual plans in the DEIS do not appear to reflect a recent amendment to the subdivision code which requires short block lengths in the Residential District. Please review Ordinance 946, as said standards have the potential to significantly alter the project layout.

Multi-Modal Land Transportation Plan (2013)

The Kaua'i Multimodal Land Transportation Plan (MMLTP), approved by Council in 2013, sets a goal of flatlining total annual vehicle miles travelled via trip mode shifts to active transportation modes, such as walking, biking and transit. For this to occur, the walkability of towns and urban centers must improve which will require stronger linkages between land use and travel modes. The FEIS should acknowledge this goal and address how the project will support vehicular trip mode shift to pedestrian, bicycle and transit trips.

Smart Code (Form-Based Code)

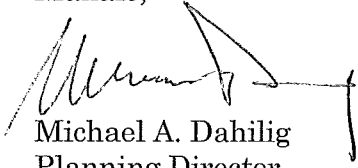
The Sustainability Plan for HoKua Place refers to "Smart Code" and states that the conceptual plans implement Smart Code principles. The County is currently implementing Smart Code's transect-based (or place-based) zoning, also known as Form-Based Code, via two community plans. As shown in the DEIS, the project would create a community segregated into two building types: the single-family house and the multi-family apartment complex. Form-Based Code supports a seamless mix of building types to meet diverse housing needs at a range of price points. This mix includes the "missing middle" building types that provide medium-scale, higher density housing such as the duplex, carriage house, mansion apartment, and cottage court. This zoning approach is codified in the Draft South Kaua'i Community Plan and is supported in the Draft Lihu'e Community Plan. Please be aware that the General Plan Update will explore how an Island-wide approach to form-based code could be implemented.

Other Comments:

- In regards to the TIAR and recommendations for the design of the proposed new connector road from the Temporary Bypass Road to Olohena Road, please address comments from the Department of Public Works.
- On Page 18, Paragraph 1, a description of Kapa'a Town Park is used but it reflects the vision for the facility and is not an accurate description of the existing facility. Likewise, Paragraph 2 on the same page reflects a vision statement for the Bypass Road and does not illustrate current conditions.
- Section 2.2, Page 19, states that the project will address housing needs "without significantly affecting reserve areas for foreseeable urban growth". Please clarify the meaning of this statement, including what is meant by "reserve areas for foreseeable future growth."
- Page 21, please clarify the meaning of "social sustainability."

Should you have any questions, please contact Marie Williams, Planner, at (808) 241-4050.

Mahalo,



Michael A. Dahilig
Planning Director

CC: Jodi Higuchi, Office of the County Attorney
State Land Use Commission