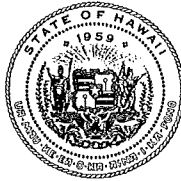


DAVID Y. IGE
GOVERNOR OF HAWAII



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:
EMD/CWB

01019PJF.15

January 16, 2015

Mr. Daniel Orodener
Executive Officer
Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
235 South Beretania Street, Suite 406
Honolulu, Hawaii 96813

Dear Mr. Orodener:

**SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for
Proposed HoKua Place Project
Kapaa, Kawaihau, Island of Kauai, Hawaii**

2015 JAN 23 A 7:01
LAND USE COMMISSION
STATE OF HAWAII

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated December 11, 2014, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please 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>

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).
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/View/home.aspx>. 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.

3. If the project involves work in, over, or under waters of the United States, it is highly recommend that your applicant contact the Army Corp of Engineers, Regulatory Branch (Tel: 438-9258) 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.

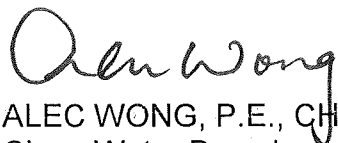
4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54,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

Mr. Daniel Orodener
January 16, 2015
Page 3

01019PJF.15

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,

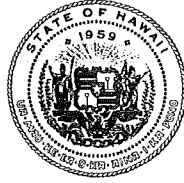


ALEC WONG, P.E., CHIEF
Clean Water Branch

JF:bk

c: DOH-EPO [via e-mail only]

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

January 15, 2015

In reply, please refer to:
File:

LUD - 4 4 3 003 001 EISPN
Prop HoKua Place Proj-ID2004

Mr. Daniel E. Orodener
Executive Officer
Department of Business, Economic
Development & Tourism
Land Use Commission
235 South Beretania Street Suite 406
Honolulu, Hawaii 96813

2015 JAN 22 P 3:19
LAND USE COMMISSION
STATE OF HAWAII

Mr. Orodener:

Subject: Docket No. A11-791 HG Kauai Joint Venture (HoKua Place)
Environmental Impact Statement Preparation Notice (EISPN)
Proposed HoKua Place Project, Olohena Road, Kapaa, Kauai
TMK (4) 4-3-003:001

We appreciate the opportunity to review the subject application/proposed development and have determined that we have the following comments to offer.


The subject project is located in the critical wastewater disposal area as determined by the Kauai County Wastewater Advisory Committee.

Please be informed that the proposed wastewater systems for the subdivision/development may have to include design considerations to address any effects associated with the construction of and/or discharges from the wastewater systems to any public trust, Native Hawaiian resources or the exercise of traditional cultural practices. In addition, if the use of individual wastewater systems are proposed for this project, please note that the Department will not approve of any subdivision request that involves properties that are located within a 1000 feet of a public potable drinking water well.

All wastewater plans must conform to applicable provisions of the Hawaii Administrative Rules, Chapter 11-62, "Wastewater Systems."

Should you have any questions, please contact Mr. Mark Tomomitsu of our branch at 586-4294.

Sincerely,


SINA PRUDER, P.E., CHIEF
Wastewater Branch

LM/LBS/MST:lmj

c: Ms. Laura McIntyre, DOH-Environmental Planning Office
Ms. Libby Stoddard, DOH-WWB's Oahu Staff
Ms. Lori Vetter, DOH-WWB's Kauai Staff



Hokua Place EISPN
Judie Lundborg Hoepner
to:
luc
01/22/2015 10:05 PM
Hide Details
From: Judie Lundborg Hoepner <judie@aloha.net>
To: luc@dbedt.hawaii.gov

LAND USE COMMISSION
STATE OF HAWAII

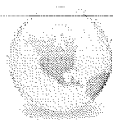
2015 JAN 23 A 7:06

Aloha,

I am testifying that adding 800 more vehicles to Kapaa area roads is beyond reasonable. Even with the by-pass road, it can easily take an hour to get through Kapaa. Please DO NOT allow this subdivision to move forward until the traffic issues in Kapaa are addressed.

Mahalo,

Judie Hoepner
639-0212



Hokua Place EISPN Comments

Forest Shomer

to:

luc

01/22/2015 03:38 PM

Cc:

info

Hide Details

From: Forest Shomer <ziraat@olympus.net>

To: luc@dbedt.hawaii.gov

Cc: info@hookuleana.com

LAND USE COMMISSION
STATE OF HAWAII

2015 JAN 23 A 7:07

Commissioners:

The proposal for enormous development at Hokua Place is alarming. It implies traffic gridlock at any number of choke points in the limited road system.

Gridlock already occurs at times, on an everyday basis, between the Wailua River Bridge and the northern end of the bypass road. Adding thousands of vehicle trips per day, which is inevitable if Hokua Place is built as proposed, would leave all residents and visitors north of the Wailua extremely vulnerable in time-sensitive situations----ranging from commuters arriving late to work, students late to school, parents late returning from work to retrieve their keiki after school or post-school activities; to even more urgent situations such as arriving at the airport for a once-a-day flight somewhere, to emergencies like driving to Wilcox. Police, fire, ambulance--all emergency service vehicles are equally susceptible to this gridlock. Many more people are riding the Kauai buses each day, but buses too cannot proceed on a gridlocked road.

The combination of Hokua Place, and a reopened Coco Palms resort, each generating hundreds of vehicle trips per hour throughout the day, would be a 'perfect storm' rendering the northern half of the island a less desirable, or just plain undesirable place from which to come and go. The impact on tourism would be unavoidable--word travels fast among travelers these days. We surely don't want large numbers of visitors having negative experiences such as missed flights due solely to inadequate ground transportation!

If one accepts the premise that *some* development is going to occur at Hokua Place, and that Coco Palms will be adding its big share in generating traffic before very long, the County must anticipate and prepare by improving and expanding the road system. The cost of those improvements could and should be partly borne by those benefiting from these two developments, rather than merely free-loading their vehicle trips into the already burdened system.

I call upon the County to begin the improvement process by re-routing Kuhio Highway mauka the Coco Palms. There needs to be a new 4-lane bypass extension from the south end of the current bypass, to behind instead of in front of Coco Palms, and south via a new crossing of the Wailua, reconnecting to 3-lane Kuhio south of the Wailua.

The benefits of such a improvement include:

- increased highway capacity at its main choke point
- removal of the existing lanes south of the Shell station, to reconnect Coco Palms with the beach and to quiet the shoreline from the steady traffic roar
- an opportunity to replace or upgrade the existing sewage facility
- improved access to the Wailua house lots area
- resolution of the traffic congestion where the existing bypass traffic has to merge into the single southbound lane of Kuhio
- a river crossing less susceptible to tsunami damage--which has the potential to sever traffic between the North and East shores!

Lastly: the chance to create a truly vibrant Historic Park district at the mouth of the Wailua River, an honoring of the sacredness of the location.

It wouldn't take Hokua Place to make such a road improvement/relocation worthwhile--but with Hokua Place, it would make such changes urgent and essential.

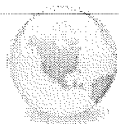
Please look for ways to get started on highway upgrades now, before rather than after any large development. Sincerely,

Forest Shomer

ziraat@olympus.net

PO Box 301

Kapaa



Re: REFERENCE: HoKua Place, Section 343-5e HRS Preparation Notice, Environmental Impact Statement.

jonathan jay

to:

luc, info

01/22/2015 03:20 PM

Cc:

Ken Taylor, brucesiv

Hide Details

From: jonathan jay <jjkauai@gmail.com>

To: luc@dbedt.hawaii.gov, info@hookuleana.com

Cc: Ken Taylor <taylork021@hawaii.rr.com>, brucesiv@hawaii.rr.com

Please respond to jjkauai@gmail.com

LAND USE COMMISSION
STATE OF HAWAII

2015 JAN 23 A 7:07

On Thu, Jan 22, 2015 at 3:20 PM, jonathan jay <jjkauai@gmail.com> wrote:

Aloha Land Use Commissioners.

At a recent community meeting in regard to this 'Kapa`a Heights' project now referred to as "HoKua Place", a number of issues, concerns, questions, and requests were identified. On behalf of the east-side members present, I am submitting a summary of the points raised:

First and foremost, we request a two week extension be made for comments on the 400+ page document released in the middle of the holiday season at the end of last year. Because of the turbulent holiday season and all the responsibilities they entail: chanuka, christmas, kwanza, new years, etc, 1/2 of the 30 day comment period evaporated in the blink of an eye. To read thru the document and make cogent analysis takes time, which is why 30 are mandated. However, these 30 days are not like other 30 day periods throughout the year. 2 additional weeks would allow for for an actual 30 days worth of review to be actually available.

Comments, Concerns and Questions:

1) ownership:

can the developer show clear title and/or royal patents to this property? If clear and legal ownership of the property can not be demonstrated, it is inappropriate to respond to any requests from the developer.

We request that no zoning change be allowed until such conditions are met.

2) road congestion/ auto traffic:

Of course this is a concern, and has been in this region for the last 30 years. Many plans have been made to upgrade the transportation infrastructure going back to at least the general plan of 1978, state 2000 DOT and many others, which have largely remained undone. We request that until the previously identified transportation infrastructure upgrades are completed, that no change in zoning be allowed. Transportation infrastructure needs based on existing allowable development capacity never took into consideration this newly proposed large-scale density at this location.

Until long existing needs unmet needs are met, we request no additional density be approved.

3) waste:

how will the waste from 2k people in this proposed high-density development be treated? the existing waste-treatment facility near lydgate is over-capacity. Existing fecal/bacterial levels in the local waterways is far above allowable health levels.

We request that until existing conditions are brought with allowable health levels that requests for additional zoning density be denied.

4) pedestrian/school children access:

the existing pedestrian access up the hill from the roundabout to the school is inadequate and dangerous for school children walking to school. The road bed is situated toward the edge of the hillside such that before the children approach the school, room for the walkway on the north side of Olohena road is squeezed out, and an unsafe crossing must be made at the curve of the road with low line of sight visibility. If the road was re-aligned and moved closer in to the school, the children would be able to safely walk all the way to the school, and then cross safely at a controlled intersection on a straight section of road directly in front of the school.

If the developer is earnest about working in partnership with the community to meet the community's needs while profiting from enhanced development this zoning request will allow, they will demonstrate this good faith by completing this pedestrian improvement adjacent to the parcel before receiving a zoning change.

We request that no zoning change be allowed until such conditions are met.

5) poorly designed dangerous intersection north of project:

At the junction of Olohena, Kaapuni and Keahulua roads, the intersection was never properly designed or engineered to provide safe transit by automobile, cyclists, or pedestrians.

If the developer is serious about working in good faith with the community to meet community needs while pursuing a healthy profit resulting from a change in zoning from ag to urban, the developer will demonstrate this good faith by completing these upgrades before receiving a zoning change.

We request that no zoning change be allowed until such conditions are met.

6) cycle upgrades consistent with state cycle master plan:

adjacent along the parcel in question, Olohena road is intended to be made cycle friendly by introducing signage and re-engineering/broadening the shoulders of the road to allow safe passage for cyclists.

If the developer is serious about working in good faith to meet the communities needs while pursuing profit from development consistent with a change in zoning from Ag to Urban, the developer will demonstrate this good faith by making the upgrades adjacent to the entirety of the parcel in question, in this case from the traffic circle up to Olohena bridge #1 at the western edge of the parcel.

We request that no zoning change be allowed until such conditions are met.

7) improving general road alignment:

adjacent to the parcel in question, the existing roadbed curves and twists in numerous locations obscuring line of sight for drivers in both directions and increasing the danger of travel for all users of the road. Where possible, we request the developer agree to cede portions of the periphery of the parcel in question such that road alignments can be straightened, turning radius can be increased, and generally lines of sight be improved and extended to enhance safety for all road users including autos, cyclists, and pedestrians.

If the developer is serious about working in good faith with the community to meet community needs while pursuing a healthy profit made possible from a change in zoning from "Ag" to "Urban", the developer will demonstrate this good faith by completing these upgrades before receiving a zoning change.

We request that no zoning change be allowed until such conditions are met.

Mahalo for your attentive reading and consideration of the points raised here. We request that receipt of these comments be confirmed via email in a timely manner. Thank you kindly.

Respectfully,

jonathan jay
Ken Taylor
James Alalem
Tommy Makanani
Jerry Pacheo

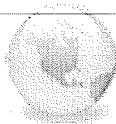
Bruce Smalling

--

*me ke aloha,
jonathan jay*

--

*me ke aloha,
jonathan jay*



REFERENCE: HoKua Place, Section 343-5e HRS Preparation Notice, Environmental Impact Statement.

jonathan jay

to:

luc, info

01/22/2015 03:15 PM

Cc:

Ken Taylor, brucesiv

Hide Details

From: jonathan jay <jjkauai@gmail.com>

To: luc@dbedt.hawaii.gov, info@hookuleana.com

Cc: Ken Taylor <taylor021@hawaii.rr.com>, brucesiv@hawaii.rr.com

Please respond to jjkauai@gmail.com

LAND USE COMMISSION
STATE OF HAWAII

2015 JAN 23 A 7:07

Aloha.

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Until long existing needs unmet needs are met, we request no additional density be approved.

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Mahalo for your attentive reading and consideration of the points raised here.

Respectfully,

jonathan jay
Ken Taylor
James Alalem
Tommy Makanani
Jerry Pacheo
Bruce Smalling

--

*me ke aloha,
jonathan jay*



Hokua Place EISPN Comments
John Harder to: luc, info
Cc: Gabriela Taylor, kenneth Taylor, Pat Gegen

LAND USE COMMISSION
STATE OF HAWAII
01/22/2015 12:13 PM

2015 JAN 23 A 7:07

Hokua Place EISPN Comments

luc@dbedt.hawaii.gov / info@hookuleana.com

Aloha, Please insure that the following questions and concerns are addressed in the Hokua Place EIS.

Where does the development propose access to the bypass highway, and what are the anticipated traffic impacts on rush hour traffic? Will the highway need to be widened?

What will be the proposed development's impact on traffic at the southern end of the bypass (the intersection with Kūhi'ō Hwy) at the evening rush hour?

What will be the combined impact of the proposed development and the proposed hotel / condo development in the Wailua / Waipoli area on traffic on Kūhi'ō Hwy from the Bypass intersection to the Kuamoo intersection?

Where exactly will the proposed commercial center be located, what will be its access to either Olohena Rd or the bypass highway, and what would be the proposed impacts?

What will be the traffic impact of the development on the Kuhio Hwy and Kukui Kukui St intersection? It is already difficult to turn left on to the Hwy.

What will be the traffic impact of the development on the Lehua merge heading north?

What will be the development's impact on local schools?

Will there be a plan to reduce the impacts of construction waste generated during development? Will contractors be required to develop specific waste reduction and diversion plans?

What will be the impact of the development on current waste generation? Will the development provide (or require the provision of) adequate space for recycling (especially in the multi-family units)?

How will Sewage be managed? How will any sewage line link up with the existing system? If septic tanks are proposed, what will be the impact on water quality?

What will be the effect of the development on surrounding agricultural uses. Will development increase the pressure for development of the land Makai of the bypass hwy?

What will be the costs of these impacts on local taxpayers (infrastructure, time lost, health & safety, etc)?

Mahalo

John Harder

PO Box 272

4085 Kealia Rd

Anahola, HI 96703

808-823-6995

John Harder, aka the Dumpdoctor

If you're not for ZERO Waste, how much Waste ARE you for?



Fwd: W-KNA comments - EISP for HoKua Place, Petition for District Boundary A...
RAYNEREGUSH to: luc

LAND USE COMMISSION
STATE OF HAWAII

2015 JAN 23 A 1:08

Resent due to email bounce-back for Scott Derrickson. Mahalo.

From: RAYNEREGUSH@aol.com
To: scott.derrickson@dbedt.hawaii.gov, info@hookuleana.com, gallen@harbormall.net
Sent: 1/22/2015 11:35:26 A.M. Hawaiian Standard Time
Subj: W-KNA comments - EISP for HoKua Place, Petition for District Boundary Amendment

Please find attached comments from the Wailua-Kapaa Neighborhood Association (W-KNA) with regards to the:

EISP for HoKua Place, Kapa`a - Petition for District Boundary Amendment for 97-acres from Agriculture District to Urban District, TMK (4)4-3-03:001

Thank you for the opportunity for pre-assessment consultation, review and comment.

Mahalo,
Rayne Regush
Chair, W-KNA
651-1318 c.
www.wkna.org



HoKuaPlace-WKNAEISPSubmittalFINAL.pdf



WAILUA - KAPA'A
NEIGHBORHOOD
ASSOCIATION

LAND USE COMMISSION
STATE OF HAWAII

2015 JAN 23 A 7:08

January 21, 2015

Land Use Commission
State of Hawai'i, DBEDT
P. O. Box 2359
Honolulu, HI 96804-2359
scott.derrickson@dbedt.hawaii.gov

Peter Young
Ho'okuleana LLC
1539 Kanapu'u Drive
Kailua, HI 96734
info@hookuleana.com

Greg Allen, Jr.
HG Kaua'i Joint Venture
161 Wailua Road
Kapa'a, HI 96746
gallen@harbormall.net

RE: EISPN for HoKua Place, Kapa'a - Petition for District Boundary Amendment for 97-acres from Agriculture District to Urban District, TMK (4)4-3-03:001

Thank you for referring this project to Wailua-Kapa'a Neighborhood Association (W-KNA) for pre-assessment consultation, review and comment. We also thank Mr. Greg Allen, Jr. for his presentation at our November 2014 General Meeting which was attended by 40 members of the public.

We recognize the need for affordable housing on Kaua'i and the importance of siting urban expansion adjacent to the town core. However, development is outpacing Kapa'a's roadway infrastructure. Residents and visitors are crippled by severe traffic congestion throughout the day. We are concerned that this project, when fully built-out, may contribute to this problem since timeframes for transportation remedies are uncertain.

Density.

The proposed density of 769 housing units on 97-acres is very high. Alternatives in project density with a reduced residential footprint may be more acceptable in light of constraints posed by current traffic conditions. It would also provide a more gradual transition to the rural environment of neighborhoods along Ka'apuni Road and in the adjacent ahupua'a of Waipouli. Therefore, we would like to see the Draft Environmental Impact Study (EIS) include:

- Three additional housing density scenarios (300, 450 and 600 units) as viable options for development, with visual configurations provided too.
- Describe in detail the cost challenges and design challenges posed by building multifamily structures on hillsides.

Phasing.

- Explain the relationship between Phase I-HoKua Farm Lots and Phase II-Hokua Place and describe in detail any constraints that one may have upon the other.

Request for Additional Maps.

To provide more clarity about the project, we would like to see the following detailed maps in the DEA:

- Topographic map to include clear elevation lines, streams, ditches, ditch intakes, diversions, tunnels and the location of the proposed well
- Existing cane haul roadways (paved and unpaved) along with the new proposed access roads
- Renderings of the multi-family housing and single family homes built on rim lots or significantly sloped topography, showing preliminary design for hillside construction
- Boundary map with all adjacent landowners and their TMK

Serving Residents of the Kawaihau District
"We treasure our rural community"

340 Aina Uka Street, Kapa'a, Hawai'i 96746 • 821-2837

Stream Impacts.

- Please provide the name of the stream that flows along the property boundary and empties into the Waikaea drainage canal about 800-feet downstream from HoKua Place.
- Discuss establishing a minimum instream flow standards (in coordination with COWRM) for any waterways on the property and impacts from proposed well and long-term water removal
- Identify what actions will be taken to mitigate a reduction in streamflow and enhance stream water circulation.

Inconsistent Information.

- Since so many Kapa`a Highlands documents are included in the EISPN, it would be helpful to see a list of the particular details not relevant to the HoKua Place project or highlighting any disparities.
- Exhibit N shows letters written in 2010, 2011 and 2012, from DOT District Engineer Ray McCormick, Mayor Bernard Carvalho and County Engineer Larry Dill, respectively, who voice support for 231 affordable housing units to be developed. It is unclear whether they realize that the proposed density is almost 800 units on 97-acres. This discrepancy/omission raises doubts.

County Police and Fire Public Services.

- Please describe the extent to which increased tax revenues will offset and exceed the demand for additional police and fire protection.
- Please describe roadway design requirements to be in compliance with (or greater than) County fire code requirements, particularly the roadways with cul-de-sacs.

Traffic Circulation and Congestion.

HoKua Place represents a dramatic increase in housing for East Kaua`i. Once the project is occupied, it will greatly contribute to regional traffic despite the intent to utilize multi-modal design. The 1997 Kaua`i Long-Range Land Transportation Implementation Plan has not met its 2000 and 2006 deadlines for Kapa`a roadway widening in the areas affected by the proposed zoning change.

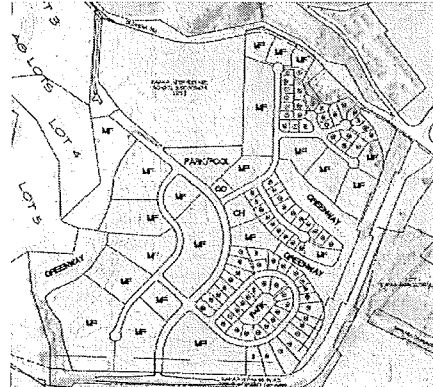
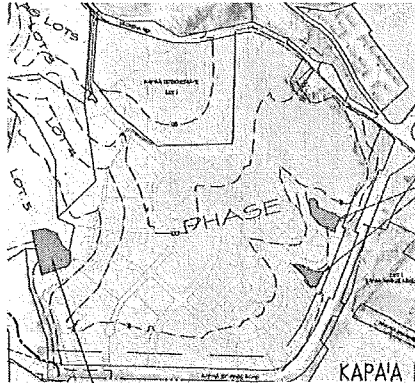
- Will an updated supplement to the TIAR prepared in 2011 be provided?
- Can the timeframes identified as “peak hours” in TIAR be include in the DEA narrative?
- Discuss and illustrate preliminary designs for Phase I and Phase II intersections at Olohena Road and the Bypass Road
- Describe the anticipated traffic impacts at the Kapa`a Roundabout, not in the context of closing the Bypass Road
- What plans does the project have to improve pedestrian access to Kapa`a?
- How will kids with bicycles cross the Bypass Road or navigate the Roundabout safely?
- What additional traffic congestion mitigation remedies or cost-sharing solutions can be proposed to further reduce the “E” designation to a “C or D” classification?
- Provide DOT/County timelines for road-widening improvements in the vicinity.

Runoff & Drainage (Exhibit F).

- Explain in more detail the drainage improvements, which may include drain lines, grass swales, and culverts to balance any expected increases in runoff resulting from the proposed project.
- Describe in detail how will nonpoint source pollution and urban runoff including sedimentation from weathering and erosion of the sloped topography be managed.
- What are potential impacts from “directing storm water to the nearest downstream street or natural drainageway”?
- Due to valleys and significant slopes in the topography, please describe in detail any specific mitigation measures to address erosion and flash flood hazards in these areas.

January 21, 2015

- The drainage system refers to three detention basins. These detention basins are also depicted as “Greenways” on the maps. Will these be accessible to residents? Do they pose hazards or recreational opportunities?



Preserving Views.

- Preparation of visual resources using photographic and computer rendered images that illustrate the project’s visual impacts from different public vantage points along the Kapa`a Bypass Road, at the Kapa`a Roundabout, and from Olohena Road would be helpful.
- The creation of public viewpoints along the rim lot portions of the property would provide benefit to the public and enhance the desirability of this new community. Can this be provided?
- Please detail compliance with all Chapter 205A, objectives and policies related to scenic and open space resources.

Secondary and Cummulative Impacts.

Generally, new affordable housing is welcomed, however Kapa`a is facing significant growth challenges. Secondary impacts associated with HoKua Place relate principally to infrastructure, with an emphasis on traffic and the need for additional public facilities and services. Cumulative impacts relate to the potential impacts of HoKua Place in the context of two large developments approved in the immediate Kapa`a area – Coconut Beach Resort (343 units) and Coconut Plantation Village (198 units) along with pending permit approvals for the Coco Palms Resort’s 350-unit hotel.

- Examine and describe any social impacts or diminished quality of life from the population growth described above
- Provide an estimated count of new student enrollment and the capacity of the public Elementary, Middle and High Schools to accommodate them?
- What are the reasonably foreseeable secondary impacts or "indirect effects" caused by this development and please identify measures to mitigate the effects.

Thank you for the opportunity to comment. We look forward to reviewing the Draft Environmental Impact Study upon its completion and request that W-KNA be provided with one copy of all future documents.

Sincerely,

A handwritten signature in black ink that reads 'Rayne Regush'. The signature is written in a cursive, flowing style.

Rayne Regush
Chairperson, on behalf of the W-KNA Board



HoKua Place, Section 343-5e HRS Preparation Notice, Environmental Impact Statement

Sharon Goodwin to: luc, info, Sharon Goodwin

LAND USE COMMISSION
STATE OF HAWAII 01/22/2015 08:56 AM

Dear Members, Land Use Commission and
Members, Hookuleana EIS Co.,

2015 JAN 23 A 7:08

I attended Mr Greg Allen's presentation of HoKua Place at the Wailua-Kapa`a Businessperson's Assoc meeting 12-27-14.

Mr. Allen consistently referred to Kapa`a town as a "City" and an "Urban" area. I understand he wishes to change zoning from Agricultural to Urban Residential. Having lived in Wailua Homestead the past 8 years I can say assuredly Kapa`a is Rural, and a Town.

The Kaua`i Long-Range Land Transportation Implementation Plan, Table ES-6 of 1997 needs completion before new development occurs in Kapa`a-Wailua. This relates to road-widening in areas of proposed zoning change from Agricultural to Urban Residential. This has not yet happened.

Kaua'i Island's infrastructure is seriously lacking. We have sewage problems. Will HoKua Place have a waste-water treatment plant? For 750+ dwellings that must be a minimum requirement. For effluent to travel to Lydgate Sewage plant (Mr Allen informs us) seems foolhardy to me. Residences that possess out-dated cesspools are soon being made to install septic systems upon their sale; therefore I think HoKua Place should take care of its own waste. Already the waste-water collection station at corner of Kuhio-Hale`ili`o emits gases of odoriferous stink each day so as to curtail my visits to Kinipopo Shopping Village. How do you think Kinipopo Village business owners feel?

While on the topic of waste, there will be large amounts of garbage/trash deposited in our landfill daily from 750+ dwellings, plus construction debris from each of those dwellings. We have landfill problems. The current landfill is running out of space, a future one not yet designated; Kaua`i Island is quite finite.

There is another development, Kulana Subdivision, on Olohena Rd near the proposed HoKua Pl. I believe Kulana is zoned for 104 homes all of which will simply further impact waste-water collection, our landfill and traffic.

How many cars/trucks/recreational vehicles will 750+ new dwellings put forth on Kauai's roads/off roads? Good question. 3 adults purchased the home next to mine; 3 adults own 3 separate cars. Kaua`i is only 35 miles across! We are experiencing big traffic problems in Kapa`a already--snarls sometimes taking 10-15 minutes to creep along 3 blocks!

The main road of HoKua Pl is designed to exit West on to Olohena Rd adjacent to Kapa`a Middle School's parking lot. Perhaps design planners saw that as being the ONLY place a road connecting Olohena and the existing Bypass Rd could be placed. My feeling at viewing the

concept map is "Yikes...poor road placement...too close to School." Students arriving and leaving School, those walking and being driven cannot help but create traffic at their "stopping" points. And since the proposed HoKua Bypass Rd is a public road, all travelers on it will add to the School traffic mayhem. Located nearby on Olohena is a 3-way road inter- section in which drivers on Ka`apuni have a blind roadway to their Right. Drivers on Olohena must negotiate a steep upward incline. This is vital infrastructure to resolve well before HoKua Pl is even up for consideration.

Can the Dept of Water, County of Kaua`i deliver with assurance all waters residents of 750+ dwellings think they need and deserve? Clean water is an issue of great concern Island-wide.

Mr Allen says the Kapa`a Schools are under-populated and can easily provide spaces for HoKua's residents' children. A Kapa`a High School employee told me classes at her School are adequately filled presently.

I think the HoKua Place concept plan for 750+ dwellings is a huge stretch of the human imagination. It would seem that families would be packed inside of dwellings on relatively small lots. Wouldn't it be great to have each family occupy an acre? Then each family could really live! And it would be magnanimous to make certain AT LEAST 30% of those acre parcels would be sold to low income/affordable housing qualifiers. Many Kaua`i families cannot afford even "affordable housing".

I cannot envision a development of such enormous density, one that would result in major infrastructure stresses, as what is being shown in the HoKua Place Concept Plan map.

Sharon Goodwin, Wailua Homestead
PO Box 446
Kapa`a, HI 96746
808-822-7646 H.



The HoKua Subdivision Plan
Diane Brenden to: luc

LAND USE COMMISSION
STATE OF HAWAII 2015 08:03 AM

2015 JUN 23 4: 7: 09
Aloha...Good Heavens! I can't even imagine the time needed to reach Wilcox Hospital from the Airport if you approve changing the zoning of 97 acres from Agricultural to Urban Residential for the planned HoKua Place Subdivision Development in Kapa'a. It is already difficult at certain times of day and I shudder to think what adding all those additional cars would create. Please keep the wise zoning of this area in place. Aloha and Mahalo, Diane Brenden



Agriculture to Urban - Hokua Place Subdivision, 800 houses
Richard Diamond to: luc

LAND USE COMMISSION
STATE OF HAWAII
01/22/2015 04:21 PM

Agriculture to Urban – Hokua Place Subdivision, 800 houses

News of the proposed re-zoning application has spread across Kaua'i rapidly, causing widespread concern and a strong negative reaction.

People are wondering whether the concept of agricultural land is now being abandoned in favor of profit for developers. Although there may be a few who will benefit financially, the resounding response of the residents of the island is: NO. WE DO NOT WANT THIS DEVELOPMENT.

We feel that it will bring our traffic to a standstill, endanger our children as they travel to and from school, place an immense burden on an inadequate infrastructure, damage our economy, and irrevocably damage our quality of life. We appeal to the Land Use Commission to refuse the application to change the zoning of 97 acres of land adjacent to the Kapa'a Middle School from Agricultural to Urban Residential.

The proposed Hokua Place subdivision will be disruptive our rural life style as well as to visitors who choose Kauai because of its relaxed pace & natural environment. The EISPN should include include social, emotional and community impacts before it goes any further.

Thank you for your attention to this, as well as to all the many others who have written to you.

Sincerely,

Richard Moll
P.O. Box 113
Kapaa, HI 96746

2015 JAN 23 A 7:09



I OPPOSE the Hokua Place development
Ashina Sunshina to: luc, info

LAND USE COMMISSION
STATE OF HAWAII
01/22/2015 10:28 PM

2015 JAN 23 A 7:09

Aloha,

News of the proposed re-zoning application has spread across Kaua'i rapidly, causing widespread concern and a strong negative reaction. People are wondering whether the concept of agricultural land is now being abandoned in favor of profit for developers. Although there may be a few who will benefit financially, the resounding response of the residents of the island is: **NO. WE DO NOT WANT THIS DEVELOPMENT.** We feel that it will bring our traffic to a standstill, endanger our children as they travel to and from school, place an immense burden on an inadequate infrastructure, damage our economy, and irrevocably damage our quality of life. We appeal to the Land Use Commission to refuse the application to change the zoning of 97 acres of land adjacent to the Kapa'a Middle School from Agricultural to Urban Residential.

We are particularly concerned about the following issues:

- The project would result in severe road congestion that would have an enormous impact on the lives of residents, who are already finding it increasingly difficult to travel between the North Shore and Lihue, as well as on tourism. The inevitable long traffic delays would make Kaua'i very much less attractive to tourists, who would find it very difficult to move around the island. Existing traffic studies are inadequate and out of date due to the growing pressure on the road system. Most significantly, the plans for road widening dating back to 1997 have not been implemented.
- The risks to the students at Kapa'a Middle School are unacceptably high. Not only is there already a problem for parents in dropping off and picking up students, but there is a risk for students safety, with students walking or riding bikes along Olohena Road or crossing it to get to the school. Moreover, the middle school is already at capacity, and a large additional influx of students could easily undermine the quality of education or leave some children without education.
- The infrastructure required to support the proposed development is inadequate. We do not have the landfill capacity to handle large amounts of construction waste and personal waste from the projected new homes. Drainage is inadequate to handle the run off from the projected hard surface areas. There is a real question as to whether the Lydgate Sewage Treatment plant could adequately handle the human waste from an additional nearly 800 residential units and associated developments. There is a question about the availability of water for the proposed residences.

In summary, this project will bring profit to developers but will severely damage the economy and quality of life of the island of Kaua'i. It will significantly weaken the concept of agricultural land, which has been fundamental to the historical development of the island. For all these reasons, the community strongly opposes it.

I oppose the Hokua Place development until all the concerns mentioned herein are fully and publicly addressed, and that there needs to be more public community meetings with the State and County agencies involved to confirm that proper action/decisions are being made.

Mahalo,
Ashina Ashina
6540 Olohena Road
Kapaa



New Development above Keila beach
Susan O'Neill to: luc@dbedt.hawaii.gov
Please respond to Susan O'Neill

LAND USE COMMISSION
STATE OF HAWAII
01/22/2015 03:54 PM

2015 JAN 23 A 7:09

Don't allow this mess.. Don't let greed spoil our beautiful island. what about an EIS? these developers are not in it for our community good they are driven by greedy realtors The price to the people who live here is too great

Susan O'Neill

"Life is a garden. Dig it."



public comment over proposed Kappa development
Linda Harmon to: luc

LAND USE COMMISSION
STATE OF HAWAII
01/22/2015 04:11 PM

I'm writing to repeat the criticism I've heard stated, too many people live already most populated part of the island. There is already a huge traffic problem.

sincerely,

l. harmon

box 257, Hanapepe Hi. 967d16

2015 JAN 23 A 7:09