



# OFFICE OF ENVIRONMENTAL QUALITY CONTROL

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March 24, 2016

Daniel Orodenker, Executive Officer  
Department of Business, Economic Development and Tourism  
Land Use Commission  
P.O. Box 2359  
Honolulu, HI 96804

Dear Mr. Orodenker,

(A15-798)

SUBJECT: Draft Environmental Impact Statement (EIS) for the Waikapū Country Town (WCT)

The Office of Environmental Quality Control (OEQC) reviewed the Draft EIS prepared for the subject project and offers the following comments for your consideration.

## 1) Agriculture Land

The Draft EIS proposes permanently converting prime agricultural land into residential development. This increase in land use intensity may also have an effect on the aquifer and its capacity. The project plans to use non-potable water and recycled water for crop irrigation. However, the total demand on the Waikapū aquifer will likely be increased, especially with other housing developments going into the area.

Additionally, the proximity of farming to homes and schools is of public concern, as there is potential for people to be exposed to chemicals. While the prevailing winds blow North to South, and will mostly keep particulates and other volatiles downwind of the residential area, Kona winds and other future wind conditions may blow the material in other directions. Also, there will be biking and jogging trails around the agricultural areas, and residents using these amenities could come in contact with farming chemicals and airborne particulates. Mitigation measures for these issues should be discussed.

## 2. Development Mitigation Measures

OEQC commends the recommendation of using low flow shower heads and toilets, LED lighting, other various Low Impact Development initiatives, and a community composting facility. While the stormwater mitigation measures are substantial, using pervious pavement or pavers would decrease stormwater run-off in general and lead to increased groundwater recharging.

### 3. Infrastructure Improvements

Since WCT promotes non-vehicular transportation, it would be expected that many residents would want to walk or ride bikes with their children to school. In the community scoping phase, Waikapū citizens identified a pedestrian bridge or culvert as ways for residents to cross the highway, even with traffic lights. Many roadway and traffic mitigations measures were identified, but pedestrian and bicycle highway crossing was not addressed. Pedestrian travel across the highway should be discussed in more detail and mitigation measures proposed.

OEQC recommends expanding upon the discussion of long term impacts within the context of anticipated climate change. Lastly, please ensure thorough editing of the document and organizing the Agency Letters Section to enhance readability.

Thank you for the opportunity to comment on the Draft EIS. We look forward to a response that also will be included within the project's Final EIS. If you have questions about these comments, please contact our office at [oeqchawaii@doh.hawaii.com](mailto:oeqchawaii@doh.hawaii.com) or (808) 586-4185.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Glenn', with a long horizontal line extending to the right.

Scott Glenn, Interim Director