



Hookuleana  
Caroline Okasako to: info, luc, mwiliams

06/24/2015 09:52 AM

Peter Young, and others making decisions about new proposed development,

Have you sat in the line of cars on the road (Kuhio Hwy.) north of the Wailua Bridge heading south? Also, going north is not any easier. We do not need additional cars (800+) which will come with the development.

Please do not grant "OK" for development until the present traffic problems are solved.

Mahalo nui loa,  
Caroline Okasako

**Bernard P. Carvalho, Jr.**  
Mayor



**Larry Dill, P.E.**  
County Engineer

**Nadine K. Nakamura**  
Managing Director

**Lyle Tabata**  
Deputy County Engineer

**DEPARTMENT OF PUBLIC WORKS**  
**County of Kaua'i, State of Hawai'i**  
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June 22, 2015

Mr. Peter Young, President  
Ho'okuleana LLC  
1539 Kanapu'u  
Kailua, Hawai'i 96734

**SUBJECT:** HoKua Place – Draft Environmental Impact Statement (DEIS)  
HG Kaua'i Joint Venture, LLC – Petitioner  
TMK: (4) 4-3-03: Por. 001  
Kapa'a, Kawaihau District, Island of Kaua'i

**PW 12.14.084**

LAND USE COMMISSION  
STATE OF HAWAII  
2015 JUN 24 P 12:40

Dear Mr. Young:

The Engineering Division of the Department of Public Works received the subject DEIS in May 2015. We appreciate the opportunity to review the DEIS and offer these general comments:

1. As noted in our comments on the EISPN, the Kaua'i County Council has adopted a resolution establishing a *Complete Streets Policy*. Therefore, *Complete Streets* design principles will need to be incorporated in this project. *Complete Streets* features include interconnected sustainable street networks providing opportunities for all modes of travel to and from neighborhoods and nearby destinations. Street layout and design shall provide connectivity with ample space for pedestrians, bicyclists, motorists, and public transportation users of all ages and abilities. We recommend that you work with our office as you finalize the street network and street cross sections for the project. The preliminary street layout shows many cul-de-sacs and dead end streets. We recommend that dead end streets be avoided as much as possible in the design of this project. In addition, where streets do not connect (for example due to concerns about access control and intersection proximity on major streets and collector streets), we recommend that pathway connections be provided for pedestrians and bicyclists. For this project, it is especially important that convenient pedestrian and bicycle connections be provided from all residential areas of the development to Kapa'a Middle School.

2. A Traffic Impact Assessment Report (TIAR) is included as part of the DEIS. We have the following comments regarding the TIAR and the discussion of traffic issues in the DEIS:
  - a. The traffic counts used in the analysis were collected in May 2012, August 2013, and October 2013. Traffic volumes on Kapa'ia have increased since that time, and the Kapa'a area is experiencing an increased amount of congestion.
  - b. The TIAR may be underestimating the trip generation for the multi-family residential land use. The study used the trip generation equations from the ITE Trip Generation Manual for all land uses, which result in a much lower trip generation value for the multi-family residential land use than using the trip generation rates from the ITE Trip Generation Manual. The study lumped all 700 dwelling units together, which may not be appropriate for this location. There are very few studies in the ITE Trip Generation Manual that have more than 300 dwelling units, so the trip generation equation may not be very accurate for 700 units. In this case, it is better to use the trip generation rate. As an example, for the PM Peak Hour, using the rate for 700 units results in 88 more vehicles than using the equation (364 vehicles instead of 276 vehicles).
  - c. The trip assignment and distribution should be re-evaluated as follows:
    - i. The TIAR assumes that only 1% of the peak hour traffic will access the site to and from Kuhio Highway north of Kapa'a. This is not realistic given that there are significant destinations north of Kapa'a, including Kealia Beach, Anahola, Kilauea, Princeville, Hanalei, and more.
    - ii. The TIAR assumes that there will be no traffic making the southbound left turn from Road "A" to the Kapa'a Bypass and no traffic making the westbound right turn from the bypass to Road "A." In response to our similar comment on the EISPN, the traffic consultant states that "*these movements will be minimal during the peak hours favoring the more direct route through the intersection of Olohena Road and Road 'A'*" (page 135 of the DEIS). We do not agree with this logic. The route through the intersection of Olohena Road and Road A is indeed more direct to access the upper portion of the project site. However, the multi-family and single-family residences on the lower part of the site would have more direct access to Kapa'a Town using the Kapa'a Bypass. We recommend that an appropriate number of trips be assigned to the southbound left turn and westbound right turn movements at this intersection.
  - d. The analysis of the roundabout at the intersection of the Kapa'a Bypass and Olohena Road used a volume-to-capacity ratio methodology to evaluate level of service. The current Highway Capacity Manual provides a methodology for roundabout analysis that uses average vehicle delay similar to signalized and other unsignalized intersections.
  - e. We question the accuracy of the analysis of the level of service for the Kūhiō Highway and Kukui Street signalized intersection. During peak hours, the cycle

length for this intersection is significantly more than the 60 seconds that was used in the analysis; our observations indicate a cycle length of about 3 minutes.

- f. We recommend that the TIAR analyze the intersection of Kūhi'ō Highway and Lehua Street since this intersection will likely receive more northbound traffic than the Kūhi'ō Highway and Kukui Street intersection. In response to our similar comment on the EISPN, the traffic consultants state their opinion "*that minimal project generated traffic would use this intersection given the heavy congestion during the peak hours instead favoring the signalized intersection of Kūhi'ō Highway and Kukui Street, where the delays would be less*" (page 134 of the DEIS). Our frequent observations of traffic in Kapa'a town show that drivers currently favor using Lehua Street to access Kūhi'ō Highway, because delays are higher at Kukui Street than at Lehua Street, largely due to the long signal cycle lengths at Kukui Street.
- g. We recommend that the TIAR analyze the intersection of Olohena Road and Lehua Street since this intersection will receive a fair amount of additional traffic.
- h. As noted in our comments on the EISPN, we recommend that the eastbound left turn lane from Kapa'a Bypass to Road "A" be included in the project. The traffic consultant's response to our EISPN comments stated that analysis shows that the intersection will operate at level of service C without the left turn lane (page 135 of the DEIS). However, page 128 of the DEIS indicates that a separate left turn lane is warranted from the bypass to Road "A." We also recommend that the southbound approach of Road "A" to the Kapa'a Bypass have separate left and right turn lanes, as suggested on page 128 of the DEIS. As mentioned above under item 2.c.ii, some project-generated traffic needs to be assigned to the southbound left turn movement at this intersection. A roundabout should be considered to help manage the turning traffic at this intersection.
- i. The DEIS and TIAR show the proposed location of the intersection of Olohena Road and Road "A" as being approximately adjacent to the property line of Kapa'a Middle School. In our comments on the EISPN, we recommended that the TIAR evaluate realigning Road "A" to connect to Olohena Road at Kaapuni Road, with the possible installation of a roundabout. Page 131 of the DEIS suggests that a roundabout is proposed at this intersection. However, the traffic consultant's comments on page 135 of the DEIS bring up some concerns about placement of a roundabout at this intersection, so it is unclear if the DEIS is indeed recommending a roundabout. We strongly recommend that a roundabout be further evaluated at this intersection, and that Road "A" be realigned to connect to this roundabout.

Mr. Peter Young, Ho'okuleana LLC

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3. Pre-development drainage flow volumes and drainage flow patterns must be maintained. The applicant is required to address any increase in storm water runoff generated from the proposed improvements and mitigate drainage impacts in compliance with the County's Storm Water Runoff System Manual. No additional storm water runoff is allowed to adversely impact natural drainage ways, streams, or downstream properties. The Preliminary Engineering Report – Drainage Improvements for Kapa'a Highlands – Phase II as Exhibit F does not provide sufficient information to analyze the impacts of storm water runoff from the proposed development.

Thank you for providing this opportunity for consultation on this pending project. We look forward to receipt of the Final Environmental Impact Statement. If you have any questions or need additional information, please contact me at (808) 241-4891 or Stanford Iwamoto at (808) 241-4896.

Very truly yours,



MICHAEL MOULE, P.E.  
Chief, Engineering Division

MM/SI

Copies to: DPW-Design & Permitting  
Larry Dill, County Engineer  
Michael Dahilig, Director of Planning  
Lee Steinmetz, Transportation Planner  
State Land Use Commission