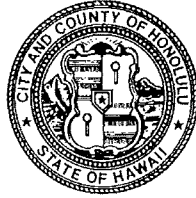


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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KIRK CALDWELL
MAYOR



JIRO A. SUMADA
ACTING DIRECTOR

2013/ELOG-243(th)

February 15, 2013

Mr. Daniel Orodener, Executive Officer
Land Use Commission
Department of Business, Economic Development & Tourism
P. O. Box 2359
Honolulu, Hawai'i 96804

Dear Mr. Orodener:

Subject: Docket No. DR12-49 (Petition for Declaratory Order
to Designate Important Agricultural Lands)
Kunia, Central O'ahu, Hawai'i
Tax Map Key: 9-2-004:013

2013 FEB 15 P 3:53
LAND USE COMMISSION
STATE OF HAWAII

We have reviewed the subject petition and offer the following comments:

1. We have no objections to the Petition proposing to designate approximately 854 acres of land in Kunia as Important Agricultural Lands (IAL). We have concerns which we hope can be addressed by the Petitioner or the relevant agency.
2. Designation of the 854-acre site as IAL is consistent with the objectives and policies of the City's General Plan intended to maintain the viability of agriculture on O'ahu. Furthermore, granting the petition is consistent with the City's long-range vision, policies, principles, and guidelines of the Central O'ahu Sustainable Communities Plan intended to protect open space and prime agricultural land in Central O'ahu along Kunia Road.
3. Based on our land use records, we concur that the proposed parcel is currently zoned AG-1 Restricted Agricultural District and is within the State Agricultural Land Use District. However, our records indicate that the proposed parcel is now identified as Tax Map Key (TMK): 9-2-004:013 which was part of a larger parcel that totaled approximately 947.5 acres of land and was previously identified as TMK: 9-2-004:005.
4. Based on our records we find that an archaeological study was conducted for 250 acres in the area and confirmed the existence of historic or archaeological sites on the parcel. Specifically, we are aware of an Archaeological Inventory Survey of an Approximate 250-acre Parcel for the Proposed Kunia Land Fill Project by David Perzinki, David W. Shideler, and Hallet H. Hammatt, dated March 2003. We are unaware of other studies. We recommend that the State Historic Preservation Division be consulted on the need to survey the remainder of the proposed IAL site.

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5. What are the adjacent and future planned uses around the designated site?
6. It is not clear if there is an adequate supply of water. More information on the agricultural water use and supply should be provided. The petition states the maximum day irrigation use of approximately 4 million gallons, an allocation of 500,000 gallons from the Kunia Water Association, and average rainfall of 28 inches per year.
7. More discussion is needed to define "critical land mass" from the Land Use Commission's (LUC) perspective and how this petition meets a minimum threshold.
8. More information is needed on the availability of power for agricultural uses.
9. We request more specificity on the current agricultural and non-agricultural uses and the potential agricultural uses of the small farmers and ranchers who have been granted long term leases and are prepping their lots for agricultural production. We request clarification of implementation measures by the Petitioner to ensure agricultural use of the proposed IAL.

To sum, we have no objections to the petition for IAL designation of the 854 acres of land subject to adequate response to our above-mentioned concerns. This will also provide further direction from the LUC on county-initiated IAL designations.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Tim Hata of our staff at 768-8043.

Very truly yours,


for Jiro A. Sumada, Acting Director
Department of Planning and Permitting

JAS:bkg
1017867

cc: Don Kitaoka and Dawn Takeuchi-Apuna, Corporation Counsel
Scott Ezer, Helber Hastert and Fee Planners, Inc.