

Appendix R

EISPN Comment and Response Letters



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850



EM

In Reply Refer To:
2010-TA-0513

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
19070 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Subject: Environmental Impact Statement Preparation Notice for Kaloko Makai, North
Kona, Island of Hawaii

Dear Mr. Matsukawa:

The U. S. Fish and Wildlife Service (Service) has reviewed the Environmental Impact Statement Preparation Notice (EISP) for the Kaloko Makai project located north of Kailua-Kona on the island of Hawaii. We received your letter soliciting our comments on September 20, 2010. On October 18, 2010, Jeff Zimpfer, from my staff, asked for a one-week extension to provide comments. We thank you for granting us a one-week extension. At build-out, this master-planned community will have 5,000 single-family and multi-family residences, commercial centers, schools, community services and supporting infrastructure. This project will be located on 1,142 acres of land that is currently undeveloped. Through our involvement with the federally funded Ane Keohokalole Highway project in Kona, we have been working with representatives from Stanford Carr Development to develop measures to avoid and minimize impacts to listed and rare species in the vicinity of this project. We have reviewed the project information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program and the Hawaii GAP Program. The following endangered plants currently occur on the site of the proposed project: (1) aiea (*Nothocestrum breviflorum*); (2) uhiuhi (*Caesalpinia kavaense*); (3) maoloa (*Neraudia ovata*); and (4) hala pepe (*Pleomele hawaiiensis*). The candidate taxon for listing, kookoolau (*Bidens micrantha* ssp. *stenophylla*), also occurs on the site of the proposed project. The endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) and Blackburn's sphinx moth (*Manduca blackburni*) are known to occur in the vicinity of the proposed project and may occur within the area proposed for development. We recommend you address potential project impacts to the sensitive native ecosystems and listed species discussed below, and include measures to minimize adverse impacts to these resources in your Draft Environmental Impact Statement (DEIS).

TAKE PRIDE
IN AMERICA

Mr. Earl Matsukawa

General Comments

- Based on our discussions with representatives from Stanford Carr Development, 150 acres of dryland forest will be set aside for a preserve in perpetuity. In addition, the developer will work with the State of Hawaii to develop a Habitat Conservation Plan (HCP) for impacts to State-listed plants that occur on lands within the project footprint but are not included in the dryland forest preserve, specifically hala pepe. In addition to developing a HCP for hala pepe, we recommend that you include kookoolau in your HCP, as this candidate for listing may become federally and State listed before this project is completed. We understand that the developers of this project will also work to maintain and restore the ecological integrity of the dryland forest. We also understand that the developer will allow natural resource professionals and organizations access to the dryland forest to do appropriate conservation work. We recommend you prepare and implement a management plan for the dryland forest preserve that includes conservation actions such as fencing and invasive species control. A source of funding for the implementation of the management plan should also be identified in the DEIS and offer our ongoing technical assistance.
- At build-out, this proposed project could potentially impact the Keauhou aquifer. The Service is concerned that the long-term demand for water from the Keauhou aquifer system would exceed the aquifer's sustainable yield and result in increased salinity of wetlands, fishponds, anchialine pools, and coastal waters in the Kaloko-Honokahau National Park. Three candidate species for listing, including two shrimp (*Metabetaeus lohena* and *Palaemonella burnsi*), and a damselfly (*Megalagrion xanthomelas*), and two endangered waterbirds, the Hawaiian stilt (*Himantopus mexicanus knudseni*) and Hawaiian coot (*Fulica alai*), depend on these aquatic ecosystems and may be adversely impacted by increases in salinity. The cumulative impacts of development in the area surrounding the Kaloko-Honokahau Park should be addressed in the DEIS.
- Hawaii's native ecosystems are heavily impacted by exotic invasive plants. Whenever possible we recommend using native plants for landscaping purposes. If native plants do not meet your landscaping objectives, we recommend that you choose species that are thought to have a low risk of becoming invasive. The following websites would be good resources to use when choosing landscaping plants: Pacific Island Ecosystems at Risk (<http://www.hear.org/Pier/>), Hawaii-Pacific Weed Risk Assessment (http://www.botany.hawaii.edu/faculty/daehler/wra/full_table.asp) and Global Compendium of Weeds (www.hear.org/gcw).
- To further minimize project impacts to listed species occurring in the project vicinity, we recommend prohibiting free movement of pets, implement public education to discourage the feeding of feral animals, especially cats, and install sturdy animal-proof garbage containers to prevent increases in the populations of house mice, rats, mongoose, and feral cats. These measures should also be incorporated into any Community Rules and Regulations instituted for the Kaloko Makai development.
- The proposed project is located on the dry leeward side of the island of Hawaii where wildland fires interdependent with the proposed project may affect federally listed upland

Mr. Earl Matsukawa

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species. The West Hawaii Wildfire Management Organization was formed to support efforts to coordinate development of area firebreaks, a system of fire suppression helicopter dip-sites, and fire prevention materials to minimize impacts of fires associated with increases in the West Hawaii population. We recommend you contact this organization for further information regarding your project and potential wildland fire issues.

Specific Comments

Page 3-11 of the EISPN states:

"The 150-acre native dryland forest is located within the southern portion of the project site and is one of the last dryland forests still relatively free of introduced, alien grasses and cattle. This patch of forest was home to at least four endangered plant species aiea (*Nothocestrum breviflorum*), maoloa (*Neraudia ovata*), *Cyperus faurieri*, and hala pepe (*Pleomele hawaiiensis*). Twenty five native species were observed within the dryland forest, eleven of them endemic to Hawaii. Four of these (three found during previous surveys only and one during this survey) are Federally listed endangered species."

We would like to clarify that aiea, maoloa, and hala pepe do currently occur in the dryland forest on the project site. The aiea occurs in an area outside of the proposed dryland forest preserve and hala pepe occurs both inside and outside the proposed dryland forest preserve. In addition, uhiuhi also occurs in the proposed dryland forest preserve.

We appreciate the opportunity to provide technical assistance in your environmental compliance process for this project. If you have any questions regarding this letter, please contact Dr. Jeff Zimpfer, Fish and Wildlife Biologist, Consultation and Habitat Conservation Planning Program (phone: 808-792-9431; email: jeff_zimpfer@fws.gov).

Sincerely,


for Loyal Mehrhoff
Field Supervisor



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Artesian Plaza, Suite 400
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Phone: 808-946-2277
Fax: 808-946-2253
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7469-01
July 25, 2011

Dr. Loyal Mehrhoff, Field Supervisor
U.S. Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, HI 96850

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Dr. Mehrhoff:

Thank you for your letter dated October 29, 2010 (2010-TA-0513). We offer the following responses in the respective order of your comments:

1. We acknowledge that the following four federally listed endangered species, 'aiea (*Nothocestrum breviflorum*), ma'oloa (*Neraudia ovata*), hala pepe (*Pleomele hawaiiensis*), and uhiuhi (*Caesalpinia kawaiiensis*) are located within the 150-acre native dryland forest within Kaloko Makai project site. Additionally, ko'oko'olau (*Bidens micrantha* spp. *ctenophylla*) which is a candidate species for listing, is also present within the Kaloko dryland forest.

Kaloko Makai has been working with the US Fish & Wildlife Service and the Department of Land and Natural Resources (DLNR) on the delineation and preservation of the 150 acre native dryland forest. In the future, we look forward to working with you to develop a management plans for the dryland forest.

Kaloko Makai has determined that the project may cause the taking of two listed plant species ('aiea and hala pepe) and one candidate species (ko'oko'olau). In response to this, Kaloko Makai prepared a Habitat Conservation Plan (HCP) with the Department of Land and Natural Resources to address the short- and long-term management measures to protect these species. DLNR is presenting reviewing the HCP.

A botanical survey was conducted and will be included in the Draft EIS.

2. We acknowledge that the Hawaiian hoary bat and Blackburn's sphinx moth are known to occur in the vicinity of the project area. Avifauna, mammalian, and invertebrate surveys were conducted and will be included in the Draft EIS.
3. We acknowledge that the Service has concerns about the long-term demand on the Keauhou Aquifer and impacts on coastal resources. Discussion of impacts and mitigation measures on groundwater and coastal resources will be included in the Draft EIS.

7469-01

Letter to Dr. Loyal Mehrhoff

Page 2

July 25, 2011



In addition, Kaloko Makai shall develop a pollution prevention plan (PPP) that provides Best Management Practices (BMPs), including structural BMPs, for pollution prevention that address all categories of permitted uses within the Project, and shall address environmental stewardship and the non-point sources of water pollution that can be generated from any uses allowed within the Project. Emphasis shall be given to BMPs that prevent or limit pollutants arising out of the permitted uses within the Project from reaching the groundwater and ocean.

4. Wherever possible, native plants will be used for landscaping throughout Kaloko Makai. We appreciate the referrals to resources regarding native plant species.
5. While prohibiting the free movement of pets could not be achieved at Kaloko Makai's discretion, a public education program will be developed to encourage confinement of pets, discourage the feeding of feral animals and promoting the installation of animal proof garbage containers to prevent increases in rodent populations.
6. We will consult with the West Hawaii Wildfire Management Organization to coordinate development of area firebreaks, wildland fire dip tanks, and fire prevention materials to minimize impacts of wildland fires.
7. As previously mentioned, we acknowledge that 'aiea, ma'oloa, hala pepe, and uhiuhi are located within the 150-acre native dryland forest on the Kaloko Makai project site. The flora section will be revised to reflect this.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



IN REPLY REFER TO:
L7621

United States Department of the Interior

NATIONAL PARK SERVICE
Kaloko-Honokohau National Historical Park
73-4786 Kaulani St., Suite 14
Kailua-Kona, HI 96740

EM

October 22, 2010

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RE: National Park Service Review of the EA/EIS Preparation Notice, Kaloko Makai Project,
Kaloko, North Kona, Island of Hawaii

Dear Mr. Matsukawa:

Thank you for the opportunity to provide input to the preparation of an Environmental Assessment/Environmental Impact Statement (EISPN) for the proposed Kaloko Makai development. This proposed development will be a 1,142-acre, master-planned, mixed-use residential community with up to 5,000 new single and multi-family residential units, approximately 153 acres of light-industrial/commercial/retail, an urgent care medical facility with potential for a regional hospital, two elementary schools, a middle school, a wastewater treatment plant, associated roadways, utilities, drainage, and water source and distribution system. Kaloko-Honokohau National Historical Park is located immediately across Queen Ka'ahumanu Highway, from the proposed project site. A development of this magnitude upslope and essentially adjacent to the National Park will significantly, and irreversibly affect park resources. Therefore the National Park Service (NPS) requests that we be a formally consulted party during the EIS process.

The National Park Service is charged with preserving the nationally significant cultural and natural resources found within Kaloko-Honokohau National Historical Park. The National Park was established in 1978 "to provide a center for the preservation, interpretation, and perpetuation of traditional native Hawaiian activities and culture, and to demonstrate historic land use patterns as well as to provide a needed resource for the education, enjoyment, appreciation of such traditional native Hawaiian activities and culture by local residents and visitors." (Public Law 95-625). The authorization was based on a study and report by a congressional advisory commission comprised of Native Hawaiians. The study recommended that the site that is the Honokohau Settlement National Historical Landmark (designated in 1962) and its adjacent waters be preserved for the benefit of the Hawaiian people and the nation as part of the national park system. Water quality and quantity are critical to this mission and to the integrity of the Park. The National Park contains two large (11 and 15-acre) ancient Hawaiian fishponds both with associated wetlands, more than 185 known anchialine pools, and 627 acres of marine habitat. These waters define the National Park. They are significant cultural resources and

also provide habitat for ten threatened, endangered, and candidate species. The National Park and the National Historic Landmark share the same boundaries. Page 1-7 of the EISPN should be corrected to reflect the fact that all park lands are within the Honokohau Settlement National Historic Landmark.

The National Park water resources are fed by, and in the case of the anchialine pools are dependent upon, groundwater input. The anchialine pools support three known candidate endangered species. 'Aimakapa Fishpond receives significant groundwater inputs and is important foraging and nesting habitat for the endangered Hawaiian stilt and the Hawaiian coot, and is also an important habitat for migratory waterfowl. The US Fish and Wildlife Service considers 'Aimakapa to be a "core wetland" in the recovery of these species¹. The EISPN incorrectly states in Section 3.4 (p. 3-6) that 'Aimakapa is separated from the ocean by a basaltic rock wall. 'Aimakapa is closed to the ocean by a sand berm, and receives significant groundwater inputs resulting in lower salinity waters.

The EISPN also incorrectly states (p. 3-6) that "*there are no wetlands located ... in the immediate vicinity of the project site.*" Kaloko Fishpond is within ½ mile of the project site. The EISPN incorrectly omits on page 3-6 that Kaloko Fishpond has approximately eight acres of associated wetlands. 'Aimakapa Fishpond and wetlands are also within the immediate vicinity of the project site. Kaloko Fishpond is in the process of being restored for productive, traditional aquaculture use for human consumption as part of the Park's Cultural Live-in Center project and has open connection to the sea. Kaloko Fishpond is used by the Hawaiian stilt for foraging and occasional nesting attempts. The Park's marine waters are inhabited by resident juvenile green sea turtles (listed as "threatened"), and the endangered hawksbill sea turtle. The endangered Hawaiian monk seal is an occasional visitor to Park waters and rests on the shoreline. The candidate endangered Hawaiian false killer whale is known to utilize park waters, and endangered Humpback whales are seasonally within Park waters.

Surface Water Drainage, Non-point Source Pollution

The waters of the National Park will be the receiving waters of this development, during and following construction. Preservation of the quality of groundwater entering Kaloko-Honokohau National Historical Park is a significant concern. Traditional and customary Native Hawaiian practices within the National Park rely heavily on the quality and quantity of the groundwater. Studies completed by the US Geological Survey in the Park² indicate that water resources in the National Park are vulnerable to upslope ground-water contamination. Water quality directly affects cultural resources within the Park. Degradation of fishpond waters may affect the health of endangered waterbirds, and the abundance and/or health of fish, which are harvested for human consumption, potentially affecting human health. Kahinihini'ula, and other culturally important anchialine pools could also be adversely affected by negative changes to water quality. Nonpoint source pollutants also affect the marine environment, coral populations, and coral

¹ U.S. Fish and Wildlife Service. 2005. Draft Revised Recovery Plan for Hawaiian Waterbirds, Second Draft of Second Revision. U.S. Fish and Wildlife Service, Portland, Oregon. 155 pp.

² Oki et al. 1999. Ground Water Resources in Kaloko-Honokohau National Historical Park, Island of Hawaii, and Numerical Simulation of the Effects of Ground-Water Withdrawals, U.S. Geological Survey Water-Resources Investigation Report 99-4070. U.S. Geological Survey, Honolulu, HI. 49 pp.

ecosystems in a variety of ways, including reducing the recruitment of new corals, interfering with coral reproduction, affecting coral calcification rates, and altering species composition.

Because of the high permeability of the site and the interconnection of surface activity and groundwater resources, polluted groundwater has the potential to have significant negative impacts to the National Park's water resources and the marine environment. However, Section 3.5 states "[a]ny project impacts anticipated upon water quality will be subject to natural processes that occur based on vertical travel distance of the infiltrated water and horizontal distance to the ocean." This statement appears to suggest that simple, unenhanced infiltration will solely be relied upon to mitigate contamination to groundwater. In a highly permeable environment with little or no soil (see EISPN Section 3.3) such as the project site, this level of mitigation is unacceptable. According to the Environmental Protection Agency's 1993 Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters, one of the objectives of urban runoff management is "protection of ground water resources" (p. 4-5). The EPA Guidance says "infiltration systems [standard drywells, such as those used in West Hawaii] may not be appropriate where groundwater requires protection" (p. 4-14). This EPA Guidance remains an active, relevant document, issued by the EPA under the authority of Section 6217(g) of the Coastal Zone Act Reauthorization Amendments for application throughout the country, including Hawaii.

In 2001 the state Land Use Commission (LUC) recognized the potential adverse impacts of upslope development and the legal and constitutional obligation to protect and preserve the resources of the National Park.

The LUC expressly determined that:

[N]ative Hawaiian rights and natural and cultural resources would be damaged or destroyed by the pollution of groundwater that reaches the National Park from surrounding areas, including proposed development at the Kaloko Industrial Park. Appropriate mitigation measures are, therefore, required under the Hawaii Constitution . . . in order to approve reclassification of the project area. (LUC 2002, Docket A00-732 Findings of Fact Conclusions of Law Decision and Order; Conclusion of Law ¶ 7)

The EIS should contain a thorough and rigorous analysis of potential impacts, direct and cumulative, to groundwater and groundwater-fed ecosystems from termiticides and pesticides used on houses, buildings, grounds, and common areas; added nutrients from irrigation and fertilized green spaces; potential releases of contaminants from commercial businesses in the light-industrial/commercial parks who generate hazardous wastes (e.g., metal finishing, photo-processing, automotive maintenance, dentistry, pesticide companies, printing, etc); potential releases of medical wastes, pathogens, and pharmaceuticals from the medical facilities; nutrients, pathogens, and pharmaceuticals carried in wastewater; contaminants associated with roadways and other impermeable surfaces including petroleum products, metals, pesticides, nutrients, and other pollutants. The EIS should discuss in detail how it will protect downslope park resources and receiving waters from these significant threats.

The EIS should include, as mentioned in the EISPN section 3.4, a full analysis of drainage construction techniques beyond what are required by the county and state, such as filtered drainage systems appropriately and specifically engineered to be effective in Kona's arid, low soil environment to reduce non-point source pollution to the groundwater and marine waters. We note that design specifications of drainage wells in compliance with the Hawaii County Public Works and State Department of Health standards do not inherently incorporate any structure or other design feature to remove petroleum, oil, nutrients, or any contaminants contained in runoff. Hawaii County codes for drainage wells do not address protection of significant environmental resources, but rather solely consider flood control and volume of runoff. There is no State law or County code currently in place to ensure that pollutants carried with surface runoff below the UIC line do not get into the environment through groundwater.

Water System

Section 3.17.1, Water System, states that the proposed project's water demand will require the construction of additional water sources. No estimate of the quantity of potable and irrigation water required for the project is provided and the location of the future water supply well is not identified. Additionally, there is discussion at 3.16.2 regarding Fire Protection but no discussion of the source of water for the system proposed (all appurtenances, hydrants and fire flow requirements).

The general effects of pumping groundwater in the area of Kaloko-Honokohau NHP will include a decline in water levels, a rise in underlying saltwater and eventually, a reduction in groundwater discharge to the ocean. The magnitude and timing of these effects on specific groundwater-dependent resources in the Park will depend upon the pumping rate and the location of the pumping wells.

If a standard of 400 gallons per day per housing unit is used, water demand for the proposed project could be as high as 2.0 million gallons per day. If higher elevation groundwater in the vicinity of the proposed project is to be the water source, then the water supply well may be located directly upgradient of the Park.

The Kaloko-Honokohau NHP ground-water study, referenced above, as well as one for the entire Kona area,³ addresses the potential for decreased ground water levels because of increased water withdrawals. Changes in the level, temperature, and salinity of groundwater in the Park's fishponds, anchialine pools, and nearshore ecosystems have the potential to adversely affect the species that inhabit these areas. Native Hawaiians continue to rely on inland and nearshore waters for traditional and customary uses. Therefore, a reduction in groundwater discharge may also adversely affect the traditional uses of these natural/cultural resources within the Park.

Because an irrevocable commitment of groundwater resources will be made for this project, the planned groundwater resources and marine water quality assessment noted on page 3-9 should identify the potable and non-potable water demand for the proposed project and the source of

³ Oki et al. 1999. Geohydrology and Numerical Simulation of the Ground-Water Flow System of Kona, Island of Hawaii; U.S. Geological Survey Water-Resources Investigations Report 99-4073. U.S. Geological Survey, Honolulu, HI. 70 pp.

this water, and should include a detailed analysis of the impacts, direct and cumulative, of these water withdrawals on groundwater dependent cultural and natural resources at the coast. A quantitative analysis of the potential changes to groundwater flow and quality within the aquifer system must be made to identify impacts on the National Park inland and nearshore marine waters. The EIS should detail how the project will incorporate water conservation.

Wastewater System

Park biological and cultural resources are affected by current development upslope of the Park because of inadequate systems for removing nutrients, pharmaceuticals, and contaminants from wastewater before they enter the groundwater system. The proposed wastewater treatment plant shown on Figure 2-1 located immediately across the highway from the National Park is not acceptable to the National Park Service. The proposed methods for dealing with wastewater treatment and effluent and the resulting direct and cumulative impacts should be analyzed in the EIS. Septic systems should not be considered for the proposed project. Additionally, methods of disposal of medical wastes and prevention of accidental releases of hazardous wastes from the medical facilities should be described in detail.

Roadway System and Traffic

The proposed Kaloko Makai development will create significant additional traffic and noise increases on Queen Ka'ahumanu Highway and at access points to the National Park and park headquarters. The EIS should analyze the effects of the increase in traffic, including direct, indirect, and cumulative impacts to visitors accessing the National Park, and the measures planned to alleviate traffic congestion, including a detailed discussion of the proposed interchange connecting Kaloko Makai with the Queen Ka'ahumanu Highway as mentioned on page 3-26 and shown in figure 2-1. Additional information in the EIS should update the status of current road widening projects, roadway expansion, and signalization.

Noise

An analysis of direct and cumulative increased noise generated by the project during both the construction and final build-out phase on the the soundscape within the National Park should be included in the EIS. The EIS should also discuss the impacts of the future development of the short austere runway at Keahole-Kona Airport. Additionally, there is a need to update and incorporate the Kona International Airport Master Plan and Part 150 Noise Compatibility Study Update, which is now completed and discusses increased noise, and night/day flight factors that will have an impact on the area and the proposed development.

Air Quality

Local air patterns and some pollution sources are described in the preparation notice. The prevalent wind system in the proposed project area is *mauka* – *makai*, nighttime and morning offshore winds changing to onshore during the day. Poor air quality resulting from volcanic emissions, airport emissions, highway traffic emissions, and fugitive dust from multiple ongoing construction sites and from quarries within a mile of the proposed site is not readily moved away from the area. Cumulative air quality impacts from the construction of this project as well as the additional cars residing in the final development, potentially 1.9 cars/household,⁴ must be

considered in conjunction with the Queen Ka'ahumanu Highway expansion, expansion of the airport, addition of the short austere airfield runway and proposed military training routes over the area, and construction of multiple industrial parks in the area. A quantitative analysis of air quality and cumulative impacts should be made in the EIS. Because the volcanic emissions, which cannot be controlled, consistently degrade air quality in Kona, those new anthropogenic sources of PM_{2.5} (e.g. automobiles) must be controlled wherever possible. The EIS should discuss how new sources will be controlled and appropriate mitigations for improving post-construction air quality. As this area transitions into a larger population center, air quality and its effect on human health is an increasingly important issue that must be addressed.

Visual Resources

Changes to the viewshed, nightsky (light pollution), topography, and vegetation within the *ahupua'a* will adversely affect the cultural landscape of the National Park. The EISPN does not include in its Impacts and Mitigation Measures (page 3-19) any discussion of impacts to *mauka* views from the National Park. Hawaiian land-use developed and relied upon the *ahupua'a* concept of land tenure and stewardship. Cultural, natural and spiritual aspects of the *ahupua'a* are all critical components in the Park's mission to perpetuate the Hawaiian culture. The EIS should include a viewshed analysis from the National Park looking *mauka* to examine and analyze direct and cumulative impacts to cultural landscape, park viewshed, and nightsky, and a description of how these impacts will be mitigated. The EIS should also include a more detailed analysis of building designs that will minimize viewshed impacts and will blend the development into the landscape, as well as including discussion of appropriate plantings to reduce these visual impacts.

Archeological and Cultural Resources:

At Section 3.11, the listing of archeological and cultural resources, historic districts and sites should also include the Kaloko-Honokohau National Historic Landmark designation (Honokohau Settlement). In addition, there should be discussion in the EIS regarding early consultation and engagement with lineal descendants and the Native Hawaiian community specifically about the development plans and archeological/cultural resources, cultural landscapes, and potential places of significance within the proposed development area.

Preservation/Open Space and Connectivity to the National Park

Kaloko-Honokohau National Historical Park is connected culturally, and through natural processes, to the *ahupua'a* in which it sits. The EIS should describe how the proposed project will preserve and foster connectivity with the National Park and the Ala Kahakai National Historic Trail. The EISPN discusses preserving and protecting archeological sites, the Road to the Sea, establishing open space and preserving coastal dryland forest. These features are integral parts of the cultural landscape of the Park and the *ahupua'a*.

Impacts to Coastal and Recreational Resources

The proposed project will significantly increase pressure by people on recreational facilities and coastal resources in the area. The National Park is the closest coastal access for this community and will bear the majority of the pressure, particularly through the connectivity mentioned above. Section 3.16.5, Recreational Facilities Impacts and Mitigation Measures (page 3-22) does not mention analysis of impacts to coastal and recreational resources stemming from use by this

⁴ Bureau of Transportation Statistics 2001, www.bts.gov

proposed community. The EIS should analyze direct and cumulative effects of 5000 additional resident families (potentially 20,000 people) utilizing the National Park and its coastal resources. This analysis should include direct, indirect, and cumulative impacts resulting from recreational uses on the National Park's law enforcement and visitor services, the park's future Cultural Live-in Center, archeological sites, fisheries, fish, coral, and protected species inhabiting nearshore waters and beaches.

Contextual Issues, Cumulative Impacts

Contextual issues and cumulative impacts are very important and should be thoroughly addressed in the EIS. The existing and proposed developments around the project have environmental review documents, including the EIS for the National Park. These documents should be consulted and the cumulative impacts of the proposed project in the context of these proposed or approved developments (e.g., airport expansion, Air Force military training routes and the short austere air field, Queen Ka'ahumanu Highway expansion, Queen Lili'uokalani Trust, The Shores at Kohanaiki, O'oma Beachside Village, West Hawaii Business Park, Kaloko Phases III and IV, Kaloko Heights, Honokohau Makai, Ane Keohokalole Highway, Kamakana Village, La'i'Opua Villages and others) should be analyzed with regard to the impacts cultural and natural resources, visitors, and cultural practitioners in the area. Cumulative, direct and indirect impacts that will affect Park resources, visitors and those engaged in traditional and cultural practices, particularly, traffic, noise, air pollution, nightsky light pollution, mauka viewshed, increased park visitation, coastal recreational use, and the quality and quantity of ground water resources, must be considered.

General Content and Map Presentation:

Public participation is the foundation of the Hawaii Environmental Protection Act. In order for the public to make informed decisions regarding this proposed project, they must be made fully aware of the resources at risk and their location. None of the figures in the EISP display the national park boundary or its federal status. County and State zoning are not applicable on federal property whose title is held by the federal government. All maps and graphics in the EIS, including the conceptual land use maps, must accurately show the location of the legislated boundary of Kaloko-Honokohau National Historical Park, the National Historic Landmark boundary, and must include a federal land designation.

The County GIS correctly indicates the federal lands at Pu'uhoonua O Honaunau NHP and Hawaii Volcanoes National Park; however the County zoning designation incorrectly shows the federal park-lands zoned as "Open." The State GIS also incorrectly shows the federal park-lands zoned as "Urban" and the park shoreline as "Conservation." These designations were zoned prior to federal ownership and no longer apply. All federal lands indicated in the EIS graphics should show federal lands designation and no zoning as County and State zoning are not applicable on federal property whose title is held by the federal government. State and private parcels encompassed within the authorized boundary of the National Park should be shown as such.

Additionally, we believe that the FEMA FIRM maps (page 7-6) have been updated more recently than April 2004. Likewise the EIS should reflect more current versions of the Hawaii County Data Book and U.S. Census information.

Thank you for the opportunity to provide these comments early in your environmental review process. To receive a copy of the national park boundary and federal lands GIS shapefiles, or if you have questions on these comments, please contact me at 808-329-6881 x1201, kathy_billings@nps.gov, or Sallie Beavers, Chief of Resources Management at x 1220, sallie_beavers@nps.gov.

Sincerely,



Kathy Billings
Superintendent

cc: Office of Environmental Quality Control
Stanford Carr Development, LLC
County of Hawaii Planning Department
County of Hawaii Department of Water Supply
Commission on Water Resources Management
State Office of Planning
Hawaii Department of Health
State of Hawaii Land Use Commission
State of Hawaii Historic Preservation Division
US Fish and Wildlife Service
National Marine Fisheries Service
Office of Hawaiian Affairs
Makani Hou o Kaloko-Honokohau
Na Kokua o Kaloko-Honokohau
NPS Pacific West Regional Office

7469-01
July 25, 2011



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Ms. Kathy Billings, Superintendent
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Kaloko-Honokohau National Historic Park
73-4786 Kanalani Street, Suite 14
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Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Ms. Billings:

Thank you for your letter dated October 22, 2010 (L7621). We offer the following responses in the respective order of your comments:

1. We acknowledge the Kaloko-Honokohau National Historical Park contains two large fishponds, 185 anchialine ponds, and 627 acres of marine habitat. Section 3.5 in the Draft EIS will include the information you provided.
2. Section 3.5 in the Draft EIS will state "Aimakapa is closed to the ocean by a sand berm..."
3. The Draft EIS will reflect the recommended changes to identifying resources located in the vicinity of the project site.
4. Surface Water Drainage, Non-Point Source Pollution: The Draft EIS will discuss drainage, non-point source pollution, and the potential impact to groundwater resources and the nearshore marine environment and mitigation measures. An analysis of potential impacts to groundwater and ground-water fed ecosystems needs to be based on evidence that such impacts are likely to occur. This analysis based on available data and understanding of the hydrology of the area will be provided in the Draft EIS.

Based on the aforementioned analysis, appropriate mitigation measures will be recommended to minimize urban runoff and to protect groundwater resources.

5. Water System: Kaloko Makai's water demand will require development of additional water sources, storage and transmission facilities. Kaloko Makai is investigating several alternatives to address its potable water needs. The Draft EIS will discuss the proposed project's demands, alternative water sources and the potential impact to ground water resources and the nearshore marine environment associated with the development of the alternative sources.

7469-01
Letter to Ms. Kathy Billings
Page 2
July 25, 2011



Estimates on potable water, non-potable water demand and irrigation will be included in the Draft EIS. Within the Kaloko Makai project, fire flow and fire protection shall be in accordance with UFC Section 10.301(c).

6. Wastewater System: In the event connection to a public wastewater system is not available, Kaloko Makai will construct and operate a Private Wastewater Treatment Plant (WWTP) within the project. The Kaloko Makai facility will treat the wastewater to produce reclaimed (R-1) quality water for general irrigation within Kaloko Makai, thus lessening the demand for potable water. The Draft EIS will discuss potential impacts on groundwater resources and mitigation measures, including additional requirements for treatment and disposal of medical wastes.
7. Roadway System and Traffic: The Draft EIS will include a Traffic Impact Assessment Report (TIAR) that will address access and traffic issues, as well as recommend mitigation measures for potential adverse impacts.
8. Noise: The Draft EIS will include a Noise Study that will address potential short-term and long-term noise impacts generated by the project, as well as proposed mitigation measures for any potential impacts. The findings of the Kona International Airport Master Plan and Part 150 Noise Compatibility Study Update will be considered.
9. Air Quality: The Draft EIS will include an Air Quality Study that will address potential short-term and long-term air quality impacts, as well as recommended mitigation measures for potential adverse impacts.
10. Visual Resources: We acknowledge the view plane along Queen Kaahumanu looking both mauka and makai is an area of natural beauty. The Draft EIS will include a discussion on visual impacts.
11. Archaeological and Cultural Resources: An Archaeological Inventory Study and Cultural Impact Assessment have been prepared and will be summarized in the Draft EIS.

Kaloko-Honokohau National Historic Landmark will be added to the listing of archaeological and cultural resources in Section 3.11.
12. Preservation/Open Space and Connectivity to National Park: The Draft EIS will discuss how the proposed project will foster connectivity with the National Park and Ala Kahakai National Historical Trail. Several resources, such as the Dryland Forest and Kohanaiki Trail (Road to the Sea), are located within the project site and will be preserved. Impacts and potential mitigation measures will be discussed in the Draft EIS.



13. Coastal and Recreational Resources: The Draft EIS will include a discussion on potential impacts on coastal and recreation resources and potential mitigation measures. Certainly the Kaloko-Honokohau National Historic Park is an important recreational resource and the proximity to the Kaloko Makai development increases visitation to some degree. The project, however, will also provide opportunities for active and passive recreation. Unless the Kaloko-Honokohau National Historic Park significantly changes the type of recreational activity it offers, however, its relative attraction as a regional passive recreational resource in the area, would not change significantly.
14. Contextual Issues, Cumulative Impacts: The Draft EIS will include a discussion on current and/or proposed developments in the project area. Each topic/section provides information on existing conditions, its potential impacts, and mitigation measures. A section on cumulative, direct and indirect impacts will be included in the Draft EIS.
15. General Content and Map Presentation: Graphics will highlight Kaloko-Honokohau National Historical Park, where appropriate.
16. FEMA: The FEMA FIRM Map will be updated and the correct Community Panel Number will be referenced.
17. Data: The Draft EIS will reflect most recent version of the Hawaii County Book and US Census data.

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa", is written over a faint circular stamp.

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



IN REPLY REFER TO:
L7621

United States Department of the Interior

NATIONAL PARK SERVICE

Ala Kahakai National Historic Trail
73-4786 Kanalani St., Suite 14
Kailua-Kona, HI 96740

October 22, 2010

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RE: National Park Service – Ala Kahakai National Historic Trail - Review of the EA/EIS
Preparation Notice, Kaloko Makai Project, Kaloko, North Kona, Island of Hawaii

Dear Mr. Matsukawa:

Thank you for the opportunity to provide input to the preparation of an Environmental Assessment/Environmental Impact Statement (EISP/N) for the proposed Kaloko Makai development. This proposed development will be a 1,142-acre, master-planned, mixed-use residential community with up to 5,000 new single and multi-family residential units, approximately 153 acres of light-industrial/commercial/retail, an urgent care medical facility with potential for a regional hospital, two elementary schools, a middle school, a wastewater treatment plant, associated roadways, utilities, drainage, and water source and distribution system.

The National Park Service (NPS) administers the Ala Kahakai National Historic Trail (NHT), which was added to the National Trails System by the U.S. Congress on November 13, 2000 (Public Law 106-509). The legislation authorizing the Ala Kahakai NHT identifies an approximately 175-mile portion of prehistoric *ala loa*, and other trails on or parallel to the seacoast extending from Upolu Point on the northern tip of Hawaii Island down the west coast of the island around South Point to the east boundary of Hawaii Volcanoes National Park. The Ala Kahakai National Historic Trail combines surviving elements of the *ala loa* with segments of later *alanui aupuni*, which developed on or parallel to traditional routes, *mauka-makai* trails, and more recent pathways and roads that created links between the historic segments. Natural and cultural resources and landscapes are vital to the mission of the Ala Kahakai National Historic Trail.

Ala Kahakai National Historic Trail is aware that Kaloko-Honokohau National Historical Park is commenting on the proposed Kaloko Makai development and echoes the concerns raised by the Park regarding: the impacts on the Honokohau Settlement National Historical Landmark, cultural and natural resources including trails, associated anchialine pools, fishponds, endangered

species, wetlands, and near-shore marine resources. Ala Kahakai NHT is also extremely concerned with how the project will mitigate impacts from surface water drainage, non-point source pollution, water system, wastewater system, roadway system and traffic, noise, air quality, visual resources, and the impacts to coastal and recreational resources.

Archeological and Cultural Resources:

The National Park Service supports the preservation of cultural and natural landscapes, including historic trails, wherever possible. Within the proposed Kaloko Makai development at least two *mauka-makai* trails exist, which historically connected the *mauka* communities with *makai* lands within Kaloko-Honokohau National Historical Park.

According to an abstract completed by the State of Hawaii, Na Ala Hele, Hawaii Trails and Access System (Appendix A), the two trails have been identified as being considered State owned under Chapter 264-1 (b) Hawaii Revised Statutes (HRS), or the Highways Act. The two trails:

1. "Trail to the Sea Coast" a.k.a "Road to the Sea". This trail is referred to as State Site 50-10-27-10714. This trail has been considered eligible for nomination to the State Register of Historic Places under criteria D and E (Title 13, Subtitle 8, Chapter 198 Hawaii Administrative Rules (HAR)).
2. "Trail to Honokohau". This trail passes diagonally through the SE corner of the project area in TMK: 7-3-009:028. is referred to as State Site 50-10-27-18099, in the ahupua'a of Honokohau Nui. This trail has been considered eligible for nomination to the State Register of Historic Places under criteria A, C, and D (Title 13, Subtitle 8, Chapter 198 Hawaii Administrative Rules (HAR)).

Both of these trails lead into Kaloko-Honokohau NHP and are an important piece of the area's history. The Kaloko Makai EISP/N acknowledges only the "Road to the Sea" and needs to also recognize and incorporate the "Trail to Honokohau" within project planning and design.

Other trails that predate 1892 will also be identified in the upcoming archaeological inventory survey and should be preserved and incorporated into the planning and design for the project.

Thank you for the opportunity to provide these comments early in your environmental review process. To receive a copy of the Ala Kahakai NHT Comprehensive Management Plan, or if you have questions on these comments, please contact me at 808-326-6012 x101, aric_arakaki@nps.gov, or Rick Gmirkin, Archaeologist at x 102, rick_gmirkin@nps.gov.

Sincerely,

Aric Arakaki
Superintendent

APPENDIX A

COPY

Attachments:

Attachment A: Na Ala Hele regarding Kaloko Makai Development – 08/06/2008

cc: Office of Environmental Quality Control
Stanford Carr Development, LLC
County of Hawaii Planning Department
State Office of Planning
Hawaii Department of Health
State of Hawaii Land Use Commission
State of Hawaii Historic Preservation Division
National Marine Fisheries Service
Office of Hawaiian Affairs
Makani Hou o Kaloko-Honokohau
Na Kokua o Kaloko-Honokohau
National Parks Conservation Association
NPS Pacific West Regional Office



NA ALA HELE
Hawaii Trail & Access System

August 6, 2008

Ref: H08:17 Kaloko Makai

TO: Clement Chang, Trails Specialist

FROM: Doris Moana Rowland, Abstractor *DMR*

THROUGH: Curt Cottrell, Program Manager *CJC*

SUBJECT: Disposition of Trails through proposed Kaloko Makai Development designated as Tax Map Keys: 7-3-9-17, 25, 26 and 28, situate at Kaloko, North Kona, Island of Hawaii

The proposed Kaloko Makai Development Project is a 1,142 acre master planned community in Kaloko, North Kona, owned by Kaloko Properties Corporation and SCD Kaloko Makai LLC. Within the proposed development are located two historic trails considered to be state-owned pursuant to the Highways Act of 1892:

- 1) Trail to the Sea Coast, and
- 2) Trail to Honokohau

Both of these trails were identified in an abstract prepared in 2005 in response to the development of lands adjoining Kaloko Makai. This abstract filed as H04:15 Kohanaiki Road, discussed the aforesaid two historic trails crossing through Tax Map Keys: 7-3-9-19 and 32.

Abstract H04:15 Kohanaiki Road is attached in its entirety for your reference. There is no need to duplicate the research completed in 2005 since the history, alignment and status of the trails through Kaloko Makai are the same.

Therefore, it is recommended that a modern metes and bounds survey description of these trails within the proposed Kaloko Makai Development be completed and all adjoining landowners and other interested parties be notified of any future management plans of these historic publicly owned features.

c: Pua Aiu, Historic Preservation



February 25, 2005

Ref: H04:15 Kohanaiki Road

TO: Irving Kawashima, Trails Specialist
FROM: Doris Moana Rowland, Abstractor *DMR*
THROUGH: Curt Cottrell, Program Manager *CAC*
SUBJECT: Disposition of Trails and Old Roads within the Y-O Project through Kohanaiki and Kaioko affecting Tax Map Keys: 7-3-9:19 and 32

The Y-O Project encompasses approximately 408 acres and is comprised of Tax Map Keys: 7-3-9:19 and 32 being portions of Grant 2942 issued to Hulikoa in 1863 and Royal Patent 8214, Land Commission Award 7715, Apana 11 issued to Lota Kamehameha in 1845. Grant 2942 lies entirely within the ahupuaa of Kohanaiki and Land Commission Award 7715:11 is situate within Kaloko. A reduced copy of the current tax map is included for easy reference.

The Y-O Limited Partnership conveyed its interest in parcels 19 and 32 (besides other lands) to Koloko Heights Associates, LLC, on November 30, 2004. This Limited Warranty Deed is filed in the Bureau of Conveyances as Document Number 2004-244541. For the purposes of this report the land will continue to be referred to as the Y-O Project.

Record research was conducted to establish the existence of trails and roadways prior to 1892 as identified in documents, maps, descriptions, and sketches. Government surveyor Joseph S. Emerson identified several trails that run in a mauka-makai direction through the subject parcels: Trail to Honokohau, Trail to Sea Coast, Road to Na Wahi Ahu and Kohanaiki Road. The following field notes and survey maps provide information about the location of each of these trails.

Trail to Honokohau and Trail to Sea Coast

Emerson compiled Registered Map Number 1280 titled "Kailua Section, North Kona," from data collected in 1882 and recorded in Field Book Number 253. On June 4, 1882, a sketch of the view up the slope of Hualalai on Page 69 (Exhibit A) of the field book is of importance as it delineates a portion of two trails to the sea coast from Kohanaiki mauka identified as "Trail to Honokohau" and "Trail to Sea Coast".

Both trails originate in the vicinity of Kohanaiki Village and connect to the mauka Government Road. The entire alignment of these trails is not depicted on this sketch, however Registered Map Number 1280 provides a complete view of the alignments. This portion of Registered Map Number 1280 has been reproduced and is attached as Exhibit B.

Registered Map Number 1280 delineates the two trails forking near Kohanaiki Church with one trail passing through a portion of Grant 2942 and terminating at the Kaloko Fishpond. This is most likely the trail identified in Field Book 253:69 as "Trail to Sea Coast." The second trail shown on Registered Map Number 1280 begins near Kohanaiki Church and goes makai through Kaloko and Honokohau with the terminus on the shoreline near the Aimakapaa Fishpond. This is probably the trail labeled "Trail to Honokohau" in Field Book 253:69.

Using an Auto CAD overlay of the current tax map (shown in red) and Registered Map Number 1280 (shown in green) it is possible to identify the two trails passing through portions of the Y-O Project lands (Exhibit C).

Road to Na Wahi Ahu

In September of 1888, Emerson prepared a map titled "Akahipuu Section, North Kona, Hawaii" on file at the State Survey Office as Registered Map Number 1449. The map shows a segment of trail running in a mauka-makai direction from the Triangulation Station labeled "Na wahi ahu" on the boundary of Kohanaiki within Grant 2942 and abruptly terminating just past Triangulation Station "Kumuohu" in Kaloko. (Exhibit D) Field Book 292:57-58 identifies this trail within the Kohanaiki Houselots as "Road to Na Wahi Ahu." (Exhibit E) This label indicates the trail was much longer than as shown on Exhibit D.

Kohanaiki Road

In 1889 Emerson prepared another map of the Akahipuu Section filed at the State Survey Office as Registered Map Number 1512. A reduced copy of this map is attached as Exhibit F. On this map Emerson identifies the trail

previously referred to as "Road to Na Wahi Ahu" as "Kohanaiki Road." This alignment is totally within Kohanaiki and may be the road noted in Field Book 291:71-72 as ".... a very straight road leading from Kohanaiki to the sea."

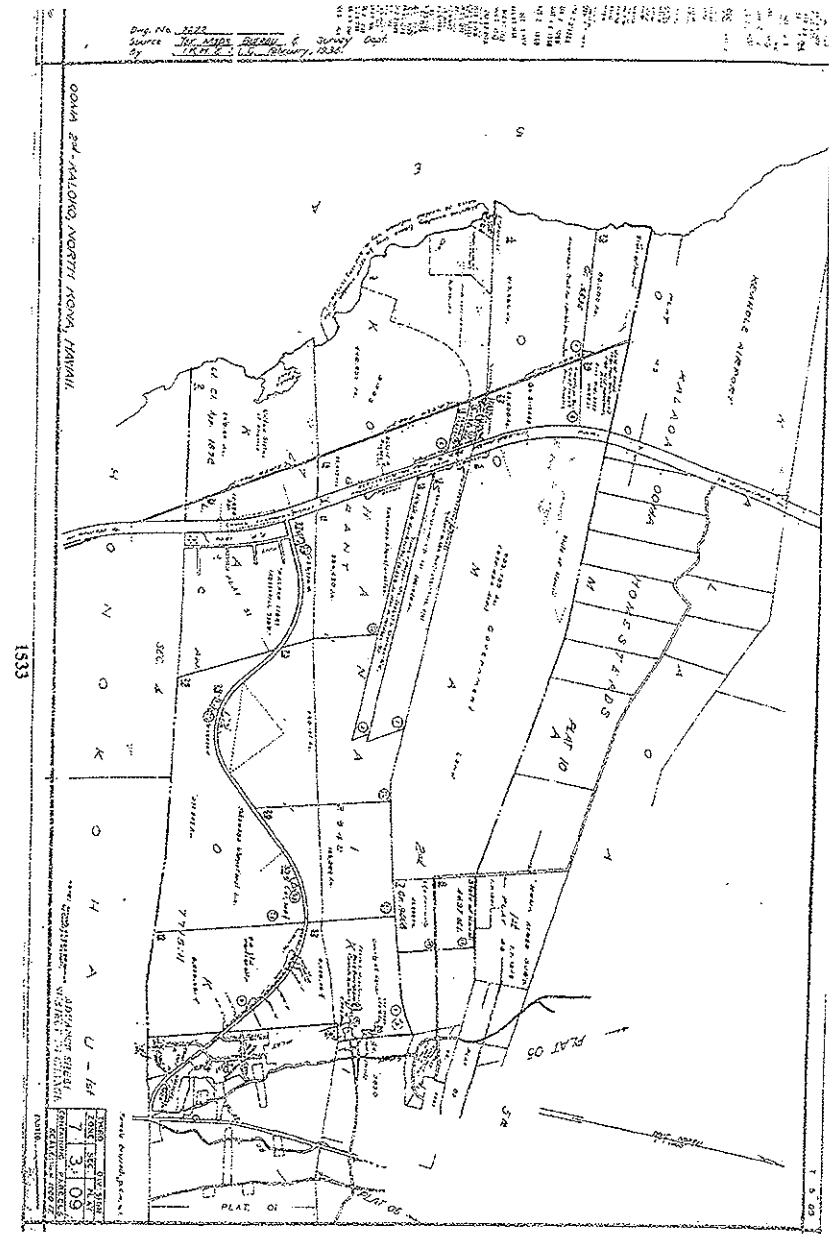
It is not clear if the Road to Na Wahi Ahu and Kohanaiki Road is the same feature because the map data is inconclusive. Registered Map Number 1449 suggests the Road to Na Wahi Ahu terminated on the boundary of Kaloko without providing access to the shoreline and the Lower Government Road. Similarly Registered Map Number 1512 does not illustrate if Kohanaiki Road continued to the sea.

Conclusion

The numerous land grants and Land Commission Awards within Kohanaiki and Kaloko indicate the presence of many residents who would require pedestrian access from the uplands to the coastline and adjoining ahupuaa. It is not known if any portions of these trails are discernable on the ground today or if they have evolved into vehicular access routes.

Based on the available evidence pursuant to the Highways Act of 1892, the State of Hawaii through its Board of Land and Natural Resources may claim a fee simple interest in the trails and roads described in this report. It is recommended that a modern metes and bounds survey description of these trails be completed and all adjoining landowners be notified of any future management plans of these historic publicly owned features.

c: Melissa Chinen, Historic Preservation
Peter Young, Chairman



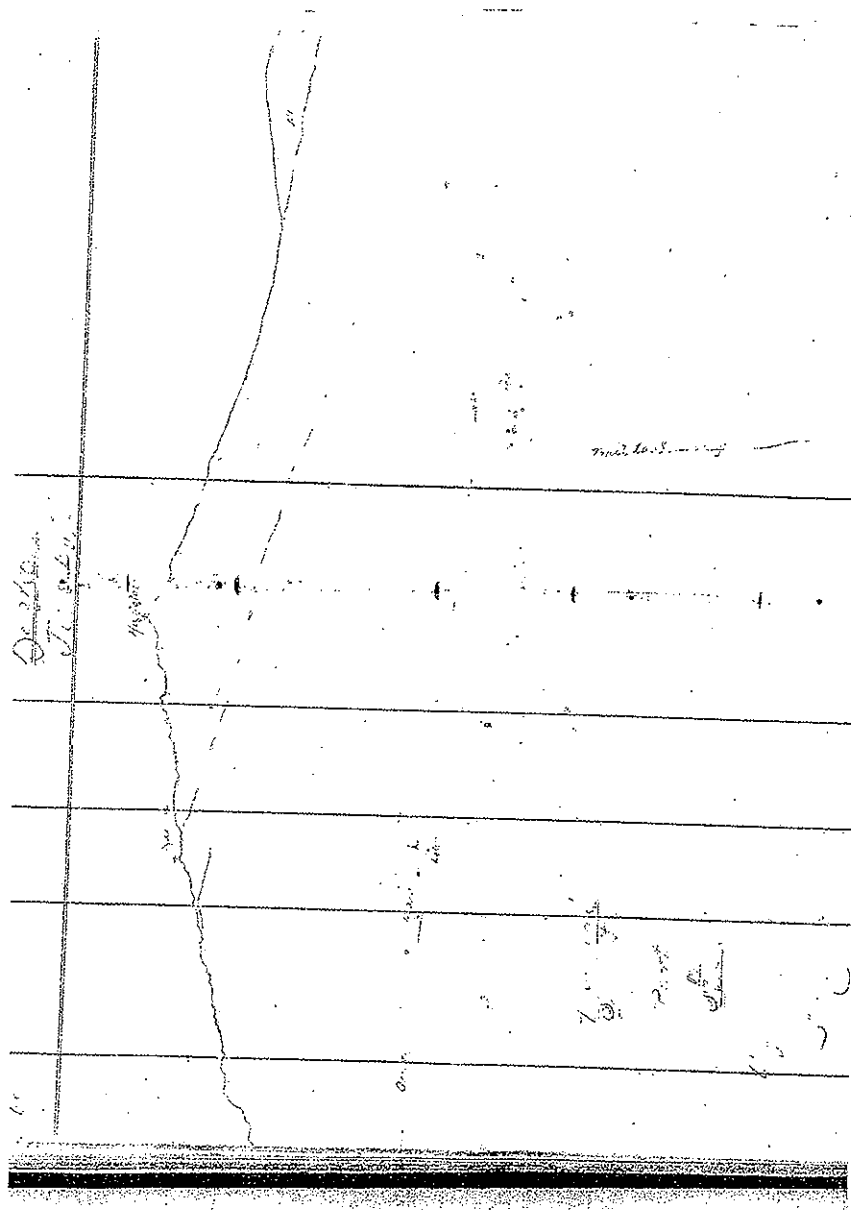


EXHIBIT A

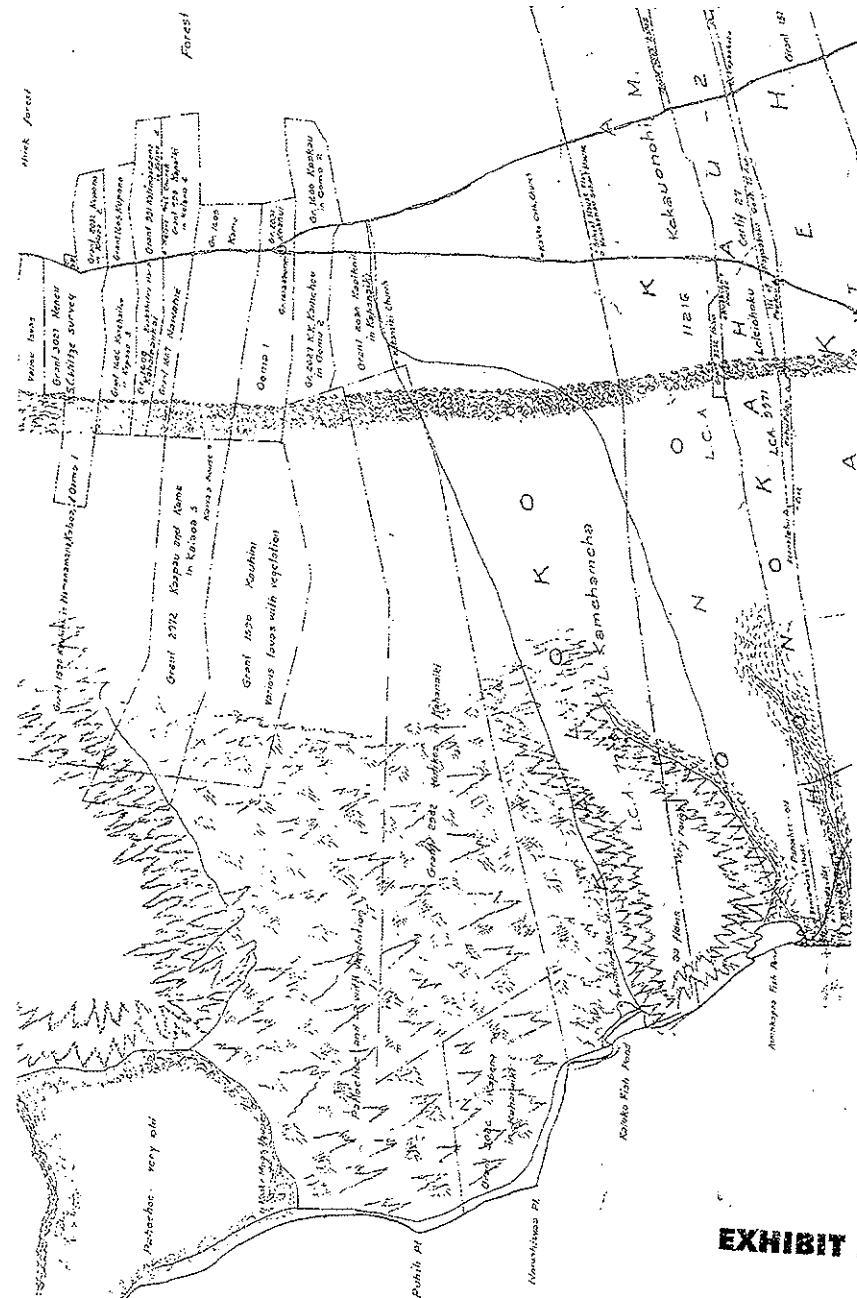


EXHIBIT B

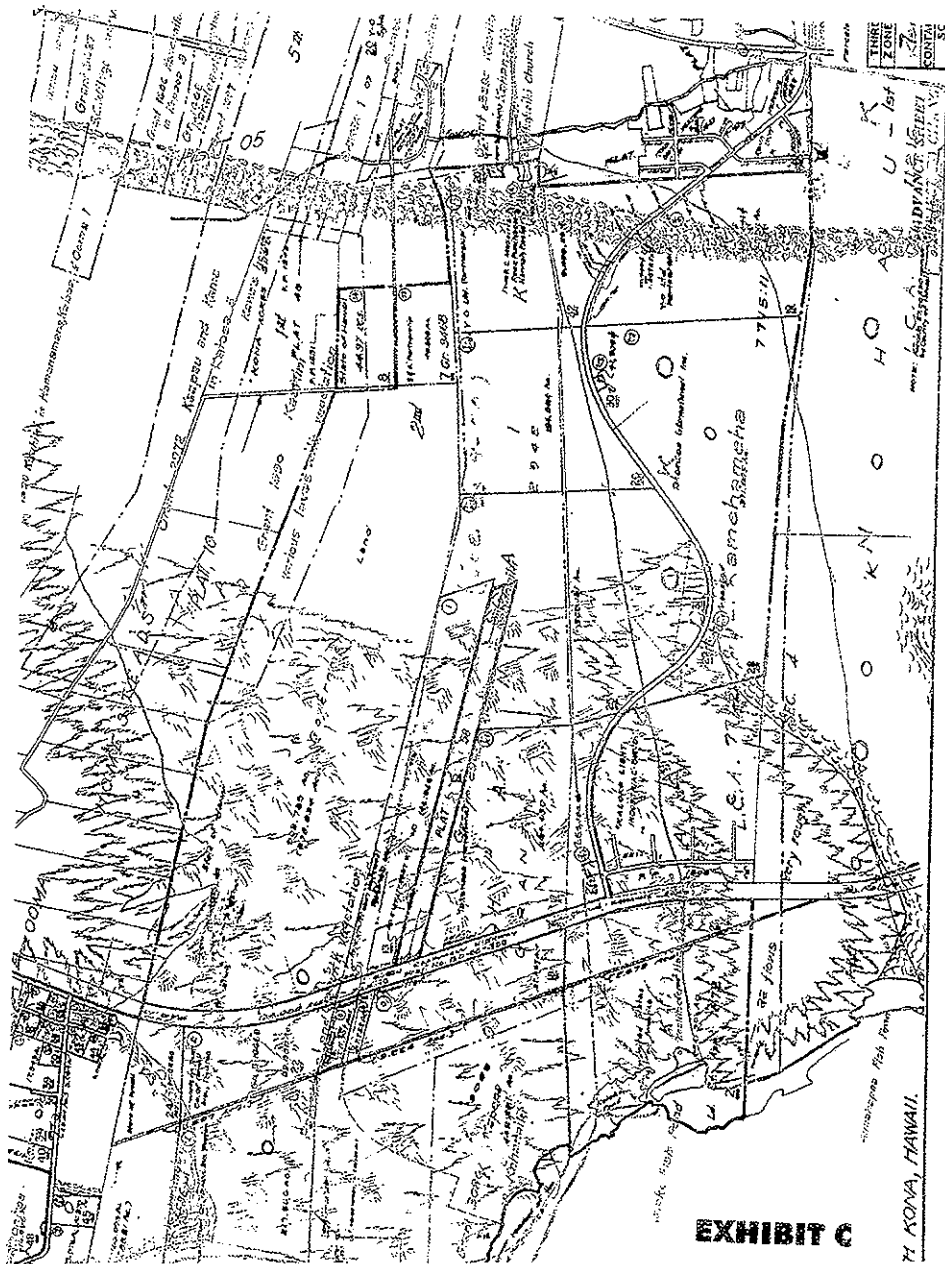


EXHIBIT C

KONA, HAWAII.

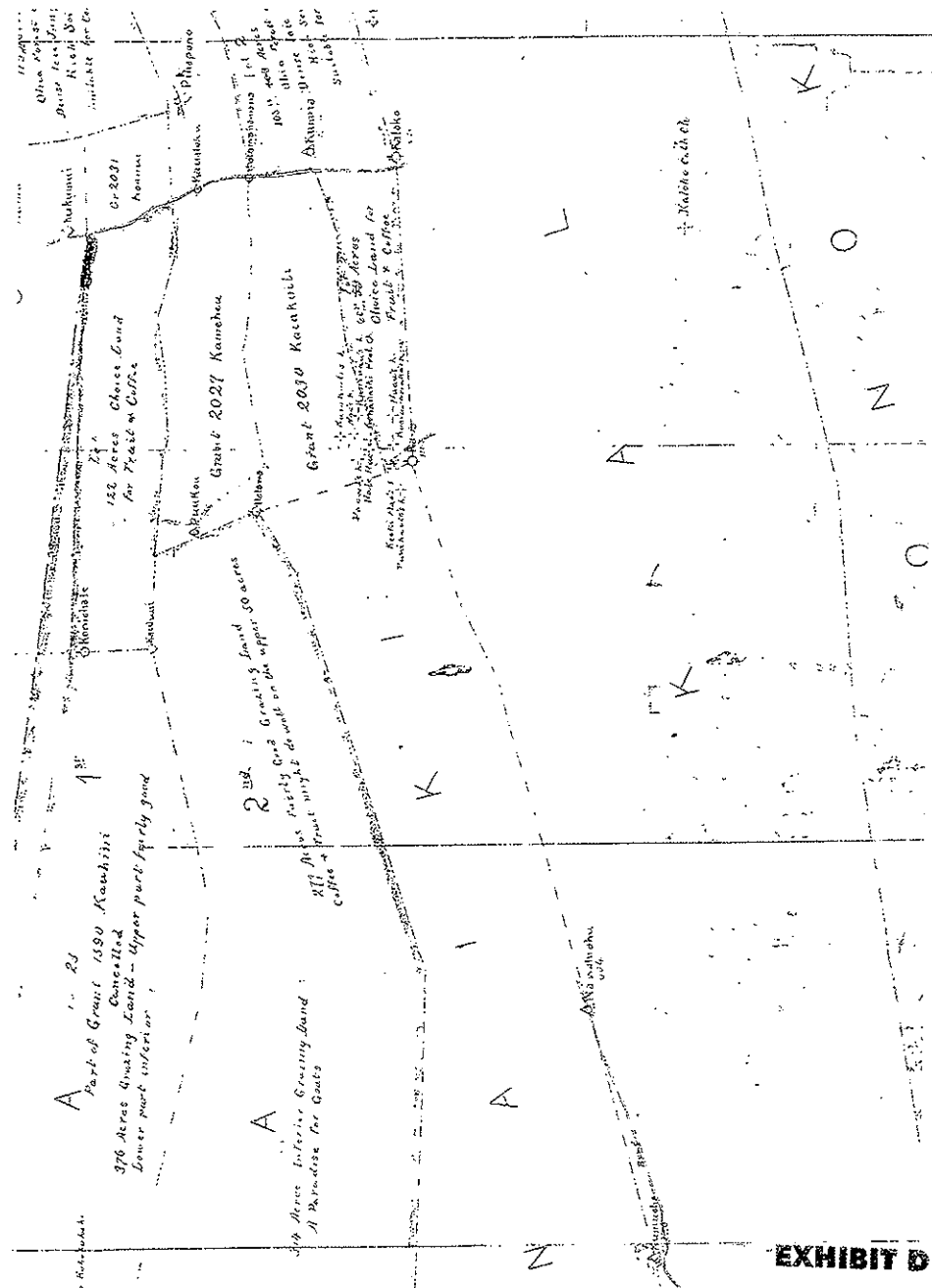


EXHIBIT D

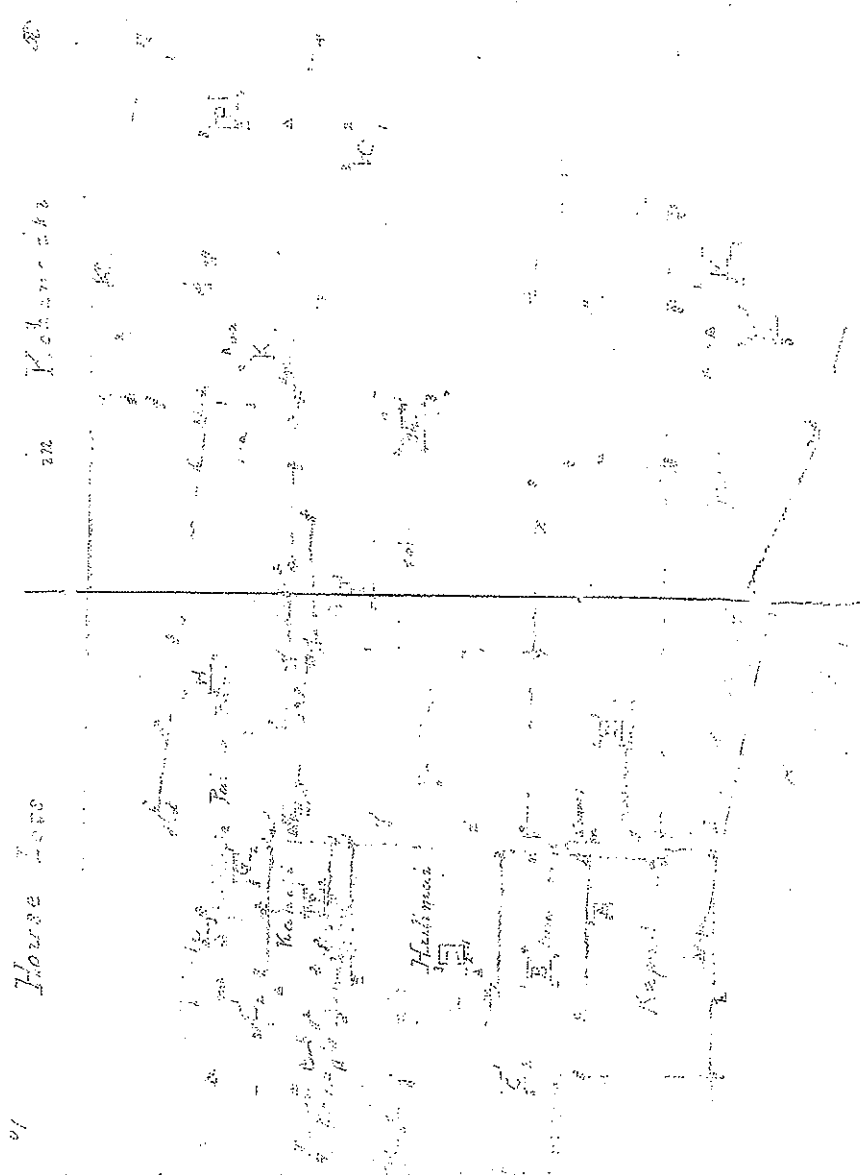


EXHIBIT E



EXHIBIT F

7469-01
July 25, 2011



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Aric Arakaki, Superintendent
U.S. National Park Service
Ala Kahakai National Historic Trail
73-4786 Kanalani Street, Suite 14
Kailua-Kona, HI 96740

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Arakaki:

Thank you for your letter dated October 22, 2010 (L7621). We offer the following responses in the respective order of your comments:

1. We acknowledge your shared concerns with Kaloko-Honokohau National Historic Park, National Park Service, regarding the potential impacts on the landmark, cultural and natural resources, and coastal resources. The Draft EIS will include discussions on impacts from surface water drainage, non-point source pollution, water system, wastewater system, traffic, noise, air, etc. and impacts to coastal and recreational resources. Relevant studies are being prepared and will be included in the Draft EIS.
2. The Draft EIS will incorporate the information you provided on the Kohanaiki Trail (Road to the Sea) and the Honokohau Trail (it is of note that the Honokohau trail is not located on the subject property). We would like to continue to work with you in preserving these trails.

The Draft EIS will discuss the historic trails that traverse through the project site.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM

OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
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LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
ABBEY SETH MAYER
DIRECTOR
OFFICE OF PLANNING

Telephone (808) 587-2946
Fax (808) 587-2824

Ref. No. P-13158

November 3, 2010

Mr. Earl Matsukawa, AICP, Project Manager
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: LUC Docket A07-778, SCD Kaloko Makai, LLC
Kaloko Makai
Environmental Impact Statement Preparation Notice
FMK(s) (3) 7-3-009; 017, 025, 026, 028, 063, and 064
Kaloko and Kohanaiki, North Kona, Island of Hawai'i

The Office of Planning (OP) appreciates the opportunity to comment on the Environmental Impact Statement Preparation Notice (EISP/N) for the above referenced proposal, for which the landowner has filed a petition to reclassify approximately 952.165 acres of land from the State Agricultural and Conservation Districts to the State Urban District. The petitioner proposes to develop a master-planned community on approximately 1,142.165 acres of land at Kaloko and Kohanaiki.

The Office of Planning will be coordinating the State's position on the petition with respect to areas of cross-cutting State concern. It is very important that the Draft Environmental Impact Statement (DEIS) fully identify and discuss potential impacts, including cumulative and secondary impacts of the proposed project, as well as recommendations for mitigating potential adverse impacts on the following areas of State concern.

1. **Groundwater and Surface Water Resources.** Water resource protection and water quality are critical State issues. The DEIS should discuss the water requirements of the proposed project and identify the proposed potable and non-potable water sources to be used for the project, as well as measures proposed to reduce water demand and promote water reuse in the project. This discussion should identify whether the proposed project is within a designated Water Management Area, the impact of the project on the sustainable yield of affected aquifers, and the impact of the project on projected water use and system improvements contained in the County's water use and development plan. The

Mr. Earl Matsukawa
November 3, 2010
Page 2

DEIS should also discuss the cumulative impacts of planned development in this region on the proposed drinking water source.

As noted in the EISP/N, groundwater withdrawal and potential recharge to the underlying groundwater resource from stormwater runoff, drainage, and wastewater effluent are of critical concern to the Kaloko-Honokohau National Historical Park makai of the project area. The DEIS should discuss potential impacts on the Park's natural and cultural resources and how these impacts will be mitigated.

2. **Agricultural Lands.** The DEIS should identify the extent of existing agricultural activity in the vicinity of the project area, and discuss what impact the proposed development might have on any agricultural activity in the area.
 3. **Cultural, Archaeological, and Historic Resources.** The DEIS should include a complete inventory of archaeological and historic sites found on the subject property, and identify the status of any monitoring and preservation plans being prepared for or approved by the State Historic Preservation Division. The DEIS should identify and describe any cultural resources and cultural practices, including visual landmarks, if applicable, on the subject property and within the ahupua'a in which the property is situated. The DEIS should discuss the impact of the proposed project on identified cultural resources and practices, alternatives considered, and proposed mitigation measures.
- OP recommends the DEIS include a map that overlays the Conceptual Land Use Map with identified sites and resources to enable the reviewer to visualize the relationship between proposed development and existing resources to be preserved and protected.
4. **Coastal Zone Management (CZM) Concerns.** The State oversees protection of natural, cultural, and economic resources within the coastal zone, which is defined as all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the United States territorial sea (§205A-1, Hawai'i Revised Statutes). The DEIS should note this definition of the coastal zone, and discuss how the proposed project will balance the competing values of economic development and preservation of coastal resources, including the following CZM objective areas:
 - a. **Coastal and Ocean Resources.** The State has an affirmative duty to protect Hawai'i's nearshore waters. The DEIS should discuss important coastal and marine resources and ecosystems that may be impacted by the proposed project. The DEIS should discuss how wastewater and

stormwater generated by the project will be prevented from adversely impacting nearshore waters, species, and habitats.

The DEIS should discuss the impact of the project on existing site and offsite hydrology, and how the project will manage stormwater and runoff. OP recommends the use of green infrastructure, specifically the use of low impact development design and other best management practices (BMPs) that promote onsite infiltration and minimize runoff from storm events. More information on stormwater BMPs can be found at <http://hawaii.gov/dbcd/c/m/initiative/1id.php>.

- b. **Coastal and Other Hazards.** The DEIS should describe any hazard conditions that are relevant to the site, such as potential risk or harm from hurricane, wind, flooding from mauka areas, erosion, volcanic activity, earthquake, landslide, subsidence, and point and nonpoint source pollution. The DEIS should describe the measures that are proposed to mitigate any hazard impacts, and provide an update on the County's adoption of the International Building Code.

The DEIS should also include a discussion of whether wildfire hazard is a concern in the area and possible mitigation measures that might be required to address any potential threat from wildfires.

- c. **Coastal Scenic Resources.** The DEIS should discuss the project's impact on scenic views to and from the coast and how these will be mitigated.

- 5. **Affordable Housing.** Increasing the supply of affordable housing is a critical State and County issue. The DEIS should specifically discuss how the Petitioner plans to meet the County affordable housing and workforce housing requirements, to include a discussion of how the project's proposed residential product types will be allocated among the market and various affordable housing target populations, and the expected price ranges for the different product types.
- 6. **Impact on State Facilities.** The DEIS should include a discussion of anticipated short- and long-term project impacts on State-funded facilities, including schools, highways, harbors, and airports, and document State agency concerns related to their respective State facilities and resources. The DEIS should cite the measures proposed to mitigate the project's impacts on State facilities and describe discussions held with State agencies to address their concerns.
- 7. **Energy Use and Impacts.** The DEIS should quantify the projected energy requirements of the project by type of use, and discuss measures to be taken to

reduce energy demand, promote energy efficiency, and to promote use of alternative, renewable energy sources, and otherwise advance State efforts to increase energy efficiency and alternative energy use under the Hawai'i Clean Energy Initiative. OP recommends the project's energy and resource use be evaluated with respect to the U.S. Green Building Council's (U.S. GBC) Leadership in Energy and Environmental Design (LEED) rating systems for new construction and neighborhood development. The DEIS should also identify any generating or transmission capacity constraints that may arise as a result of the proposed project and other projects planned for the region. The DEIS should also discuss the degree to which the project promotes transportation energy savings and reduces vehicular trips for project residents and users within the project and the region.

- 8. **Biota.** The DEIS should include an inventory of flora and fauna, including invertebrates, found on or in proximity to the project site and in any lava tubes and caves on the property. Flora and fauna of concern should not be limited to listed threatened or endangered species or those under consideration for listing. The applicant should also consult with the Database Manager at the Hawai'i Biodiversity and Mapping Program, Center for Conservation Research and Training, University of Hawai'i, (808) 956-8094, as to the potential for the presence of rare species in the project area. The DEIS should also discuss measures to be taken to protect rare, threatened or endangered species, or ecosystems of concern. Consideration should be given to conducting field observations in both wet and dry season surveys to capture the fullest range of flora and fauna.

The DEIS should provide an update on the delineation of the native dryland forest boundary and discuss specific recommendations made by the U.S. Fish and Wildlife Service and the Department of Land and Natural Resources for management of the dryland forest preservation area, including management of feral goats and pigs, if they are found in the updated biological surveys.

- 9. **Conformance with County Plan Designations and Urban Growth or Rural Community Boundaries.** Act 26, Session Laws of Hawaii 2008, reaffirmed the Land Use Commission's (LUC) duty to consider any proposed reclassification with respect to the Counties' adopted general, community, or development plans. Thus, the DEIS should discuss the proposed project's consistency with the County land use plans, including the following:
 - a. **Siting of regional hospital.** The DEIS should include a discussion of public and private efforts related to the siting of a new regional hospital in Kona, and any preliminary recommendations of these efforts. This will

assist the reader in better understanding whether the project site is the most suitable location for a regional hospital.

- b. **Transportation concurrency.** The DEIS should identify any transportation improvements that may be required by the Kona Community Development Plan, prior to occupancy of units or development within the project area.
- c. **Ane Keohokalole Highway.** The DEIS should discuss how the project intends to reconcile the creation and maintenance of a walkable, pedestrian-friendly village center with the mid-level road's function as a major, limited access arterial, when the planned arterial bisects the village center.

10. **Sustainability Analysis.** The adoption of sustainable building and development practices has long-term environmental, social, and economic benefits to Hawai'i's residents and communities. The EIS process is extremely valuable as a means to identify and discuss the specific sustainable design and development practices, including green building practices, which will be incorporated in the proposed project. The Office of Environmental Quality Control's, *Guidelines for Sustainable Building Design in Hawai'i*, and the U.S. GBC's LEED programs for new construction and its pilot program for neighborhood development (LEED-ND) offer guidelines and checklists for this purpose.

The LEED-ND rating system, in particular, is especially useful in profiling how a project protects and enhances the overall health, natural environment, and quality of life of communities. The rating system provides a range of development features and strategies that promote efficient water, energy, and resource use, including waste reduction, as well as location and design elements to reduce transportation impacts.

OP recommends that the DEIS includes an analysis of the project with respect to the LEED-ND system, and provide a discussion of the LEED elements that will or could be incorporated into the project. This information would greatly aid agencies, decision-makers, and the public in reviewing the project application.

11. **Wastewater Treatment and Disposal.** The DEIS needs to identify the proposed means of wastewater treatment and disposal, including the reuse and/or disposal of treated effluent and the disposal of waste solids, and the potential impacts and mitigation measures associated with the selected method of treatment and disposal. In addition, the DEIS should discuss how the project will implement

Policy PUB-4.6, Wastewater Reuse Area, of the Kona Community Development Plan.

12. **Solid Waste Management.** The DEIS should quantify the volume of solid waste likely to be generated by the project, and describe the impact the project will have on the County's existing and planned capacity for managing solid waste as represented in the County's solid waste management plan. The DEIS should discuss specific mitigation measures to be taken to reduce solid waste generation and to ensure that recycling and reuse are incorporated within the project area. Please also clarify what "waste diversion and reduction facilities" refers to on page 3-28 of the EISPN.

13. **Environmental Health Hazard.** If the project will have a potential to generate hazardous materials or result in the possible contamination of the air, soil, or water, please discuss how environmental and public health and safety will be protected, in particular, measures to be taken in areas planned for industrial use.

The DEIS should identify and discuss any potential health and environmental threats that may be present due to contamination from past or current use of the site, including findings from Phase I or Phase II environmental site assessments conducted at the project site. OP recommends that an ASTM 1527-05 Phase I Environmental Site Assessment or equivalent be conducted for the Master Plan area, if one has not already been conducted.

14. **Development Timetable.** The EISPN anticipates three phases of development, with major infrastructure completed by 2025. LUC requires that projects seeking reclassification be substantially completed within ten years or seek incremental approvals. The DEIS should reference LUC rules (Section 15-15-50, Hawai'i Administrative Rules) and provide a schedule of development for each phase of the total project and a map showing the location and timing of each phase or increment of development. This development schedule will be critical for the review of the petition for the proposed district boundary amendment.

15. **Miscellaneous Comments**

- a. **Section 2.2, Project Need.** This section should provide a substantive discussion of the need for the proposed project in the context of other planned development in the region.
- b. **Section 6, Alternatives to the Proposed Action.** This section needs to evaluate distinct alternatives to the proposed action, such as a smaller


Mr. Earl Matsukawa
November 3, 2010
Page 7

footprint for the proposed new community and the potential for siting the proposed development package in another location/s on the Island.

- c. **Section 6.1, No Action Alternative.** This discussion should be clarified: the no action alternative has no impact on existing tax revenues and does not reduce them. Similarly, the number of housing units and jobs are not reduced, although the opportunities for increasing housing and jobs are foregone under this alternative.
- d. The list of permits/approvals should include those approvals required from the State Department of Health for new private wastewater treatment plants and possibly injection wells, should the private wastewater treatment system be pursued.

OP looks forward to receiving the DEIS with the potential impacts and mitigation measures for the above issues addressed. If you have any questions, please call Ruby Edwards of the Land Use Division at 587-2817.

Sincerely,


Abbey Seth Mayer
Director

c: Mr. Orlando Davidson, LUC



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Ms. Mary Lou Kobayashi, Planning Program Administrator
Office of Planning
Department of Business, Economic Development and Tourism
State of Hawaii
P.O. Box 2359
Honolulu, HI 96804-2359

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Ms. Kobayashi:

Thank you for your letter dated November 3, 2010 (P-13158). We offer the following responses in the respective order of your comments:

1. Groundwater and Surface Water Resources: Kaloko Makai's water demand will require development of additional water sources, storage and transmission facilities. Kaloko Makai is investigating several alternatives to address its potable water needs. The Draft EIS will discuss the proposed project's demands, alternative water sources and the potential impact to ground water resources and the nearshore marine environment associated with the development of the alternative sources.

The Draft EIS will also discuss water conservation to be achieved through the use of reclaimed wastewater.

2. Agricultural Lands: According to the ALISH, approximately 6 percent of the Petition Area is designated "other" and the remainder is not classified. Kaloko Makai will not have an impact on agriculturally significant lands. A discussion and maps on ALISH and LSB ratings and designations for the project site will be included in the Draft EIS.
3. Cultural, Archaeological, and Historic Resources: An Archaeological Inventory Survey and a Cultural Impact Assessment have been prepared for the project and will be summarized in the forthcoming Draft EIS. A graphic displaying sites and resources identified by these studies overlaid on the conceptual land use plan will be provided.

The proposed project will comply with State and County laws and rules regarding the preservation of archaeological resources and historic sites. The archaeological inventory survey is presently under review by SHPD.

7469-01

Letter to Ms. Mary Lou Kobayashi

Page 2

July 25, 2011



4. Coastal Zone Management: The Draft EIS will include a discussion on Coastal Zone Management and how the project conforms to the project.

A discussion of potential impacts on coastal and ocean resources; coastal and other hazards; and coastal scenic resources will also be included.

5. Affordable Housing: Kaloko Makai is a master-planned community offering a wide range of housing types and affordability. Kaloko Makai will meet affordable housing requirements established by Chapter 11, Hawaii County Code Affordable Housing Ordinance, as well as applicable provisions of the Kona Community Development Plan.
6. Impact on State Facilities: The Draft EIS will include discussions of the proposed project's impacts on State facilities.
7. Energy Use and Impacts: Kaloko Makai will implement feasible measures to promote energy conservation and environmental stewardship, such as the standards and guidelines promulgated by the US Green Building Council, US EPA Energy Star Program, and other similar programs.
8. Biota: Flora and fauna surveys have been conducted and the respective reports will be summarized and included in the Draft EIS. Potential impacts and mitigation measures will be discussed.

Kaloko Makai has been working with the US Fish & Wildlife Service and the Department of Land and Natural Resources on the delineation and preservation of the 150 acre native dryland forest. Kaloko Makai has determined that the project may cause the taking of two listed plant species ('aiea and hala pepe) and one candidate species (ko'oko'olau). In response to this, Kaloko Makai prepared a Habitat Conservation Plan (HCP) to address the short- and long-term management measures to protect these species.

9. Conformance with County Land Use: The Draft EIS will include a discussion on how the Kaloko Makai conforms with County land use plans, including the Kona Community Development Plan (CDP).
10. Sustainability Analysis: In the design and construction of Kaloko Makai, SCD - TSA Kaloko Makai, LLC will seek to implement feasible measures to conform to the Office of Environmental Quality Control's (OEQC) Building Design Guidelines and Leadership in Energy and Environmental Design (LEED) program.

7469-01

Letter to Ms. Mary Lou Kobayashi

Page 3

July 25, 2011



11. Wastewater Treatment and Disposal: In the event connection to a public wastewater system is not available, Kaloko Makai will construct and operate a Private Wastewater Treatment Plant (WWTP) within the project. The Kaloko Makai facility will treat the wastewater to produce reclaimed (R-1) quality water for general irrigation within Kaloko Makai, thus lessening demand for potable water. Most of the project site is located within the Kona CDP Wastewater Reuse Area (Policy PUB 4.6). The Draft EIS will discuss potential impacts and mitigation measures associated with the method chosen.

12. Solid Waste Management: The Draft EIS will discuss potential impacts and mitigation measures associated with solid waste generation.

13. Environmental Health Hazard: Kaloko Makai is not expected to generate hazardous materials or result in the possible contamination of the air, soil, or water. Impacts on the quality of air, soil and water would be related to construction of the project. The proper mitigation measures will be undertaken.

No prior uses of the project site suggestive of the need to prepare a Phase 1 environmental site assessment.

14. Development Timetable: A phasing plan will be included in the Draft EIS.

15. Miscellaneous Comments: An expanded discussion on project need, alternatives to proposed action, and list of permits/approvals will be included in the Draft EIS.

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa".

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

October 21, 2010

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

EM
RECEIVED
OCT 25 2010

WILSON OKAMOTO CORPORATION

Wilson Okamoto Corporation
1907 South Beretania Street Suite 400
Honolulu, Hawaii 96826

Attention: Mr. Earl Matsukawa, AICP, Project Manager

Ladies and Gentlemen:

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP) for Kaloko Makai

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Division of State Parks, Division of Forestry & Wildlife, Land Division-Hawaii District, Engineering Division, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Historic Preservation will be submitting comments through a separate letter. Should you have any questions, please feel free to call our office at 587-0414. Thank you.

Sincerely,

Russell Y. Tsuji
Administrator

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 21, 2010

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

MEMORANDUM

TO: DLNR Agencies:
☒ Div. of Aquatic Resources
☒ Div. of Boating & Ocean Recreation
☒ Engineering Division
☒ Div. of Forestry & Wildlife
☒ Div. of State Parks
☒ Commission on Water Resource Management
☒ Office of Conservation & Coastal Lands
☒ Land Division -Hawaii District

FROM: Charlene Unoki, Assistant Administrator

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement preparation Notice (EISP)

LOCATION: Island of Hawaii

APPLICANT: Wilson Okamoto Corporation on behalf of SCD-TSA Kaloko Makai, LLC

Transmitted for your review and comment on the above referenced document. If you already received the document from Wilson Okamoto, we would appreciate your comments be submit by October 20, 2010.

Only 1 copy of the report available in Room 220.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

RECEIVED
LAND DIVISION
2010 SEP 30 AM 8:46
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

- () We have no objections.
() We have no comments.
(X) Comments are attached.

Signed:
Date: 9/29/10

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LM/CharleneUnoki
REF.:EISPNKaloMakai
Hawaii.488

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone X. The Flood Insurance Program does not have any regulations for developments within Zone X.
- () Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone ____.
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ____.
- () Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

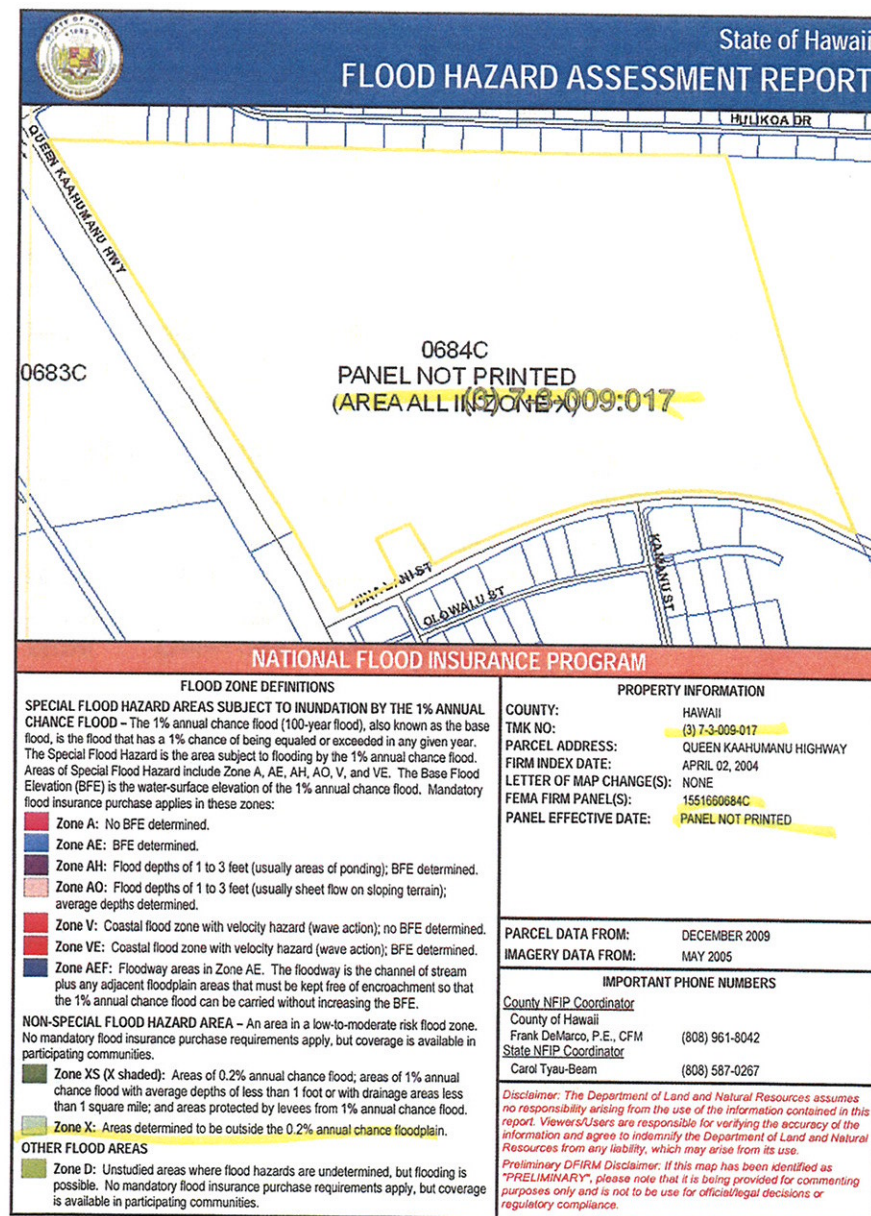
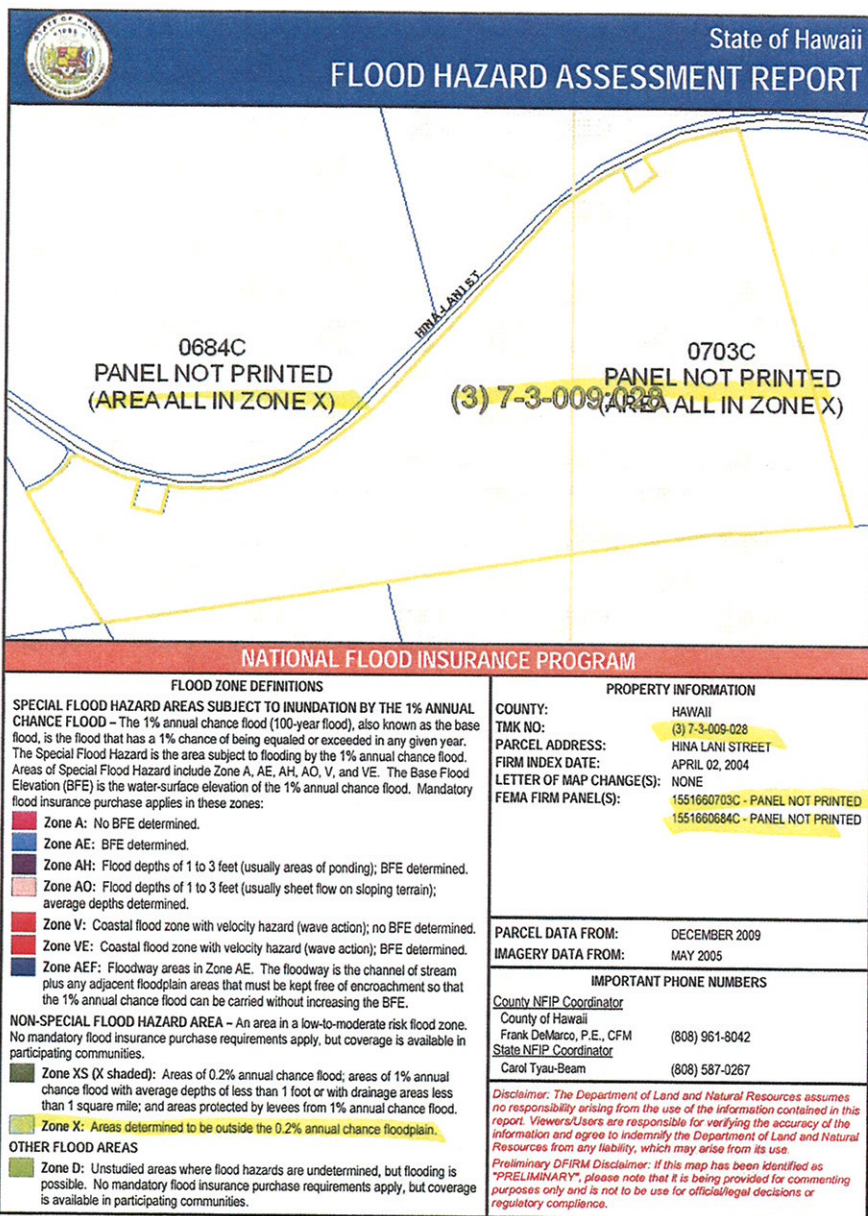
- () Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting..
- () Mr. Carter Romero at (808) 961-8943 of the County of Hawaii, Department of Public Works.
- () Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
- () Ms. Wynne Ushigome at (808) 241-4890 of the County of Kauai, Department of Public Works.
- () The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update
- (X) **Additional Comments: Please correct information on page 3-9, Item 3-6, Flood Hazard. The correct Community Panel Numbers are 1551660684C and 1551660703C (Panels not Printed). Copies attached.**
- () Other: _____

Should you have any questions, please call Ms. Suzie S. Agraan of the Planning Branch at 587-0258.

Signed: Carty S. Chang
CARTY S. CHANG, CHIEF ENGINEER

Date: 9/29/10

State of Hawaii FLOOD HAZARD ASSESSMENT REPORT	
NATIONAL FLOOD INSURANCE PROGRAM	
FLOOD ZONE DEFINITIONS SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD - The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water-surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones: <ul style="list-style-type: none"> Zone A: No BFE determined. Zone AE: BFE determined. Zone AH: Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined. Zone AO: Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. Zone V: Coastal flood zone with velocity hazard (wave action); no BFE determined. Zone VE: Coastal flood zone with velocity hazard (wave action); BFE determined. Zone AEF: Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE. NON-SPECIAL FLOOD HAZARD AREA - An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities. <ul style="list-style-type: none"> Zone XS (X shaded): Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood. Zone X: Areas determined to be outside the 0.2% annual chance floodplain. OTHER FLOOD AREAS <ul style="list-style-type: none"> Zone D: Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities. 	PROPERTY INFORMATION COUNTY: HAWAII TMK NO: (3) 7-3-009-026 PARCEL ADDRESS: HINA LANE STREET FIRM INDEX DATE: APRIL 02, 2004 LETTER OF MAP CHANGE(S): NONE FEMA FIRM PANEL(S): 1551660703C - PANEL NOT PRINTED 1551660684C - PANEL NOT PRINTED
PARCEL DATA FROM: DECEMBER 2009 IMAGERY DATA FROM: MAY 2005	IMPORTANT PHONE NUMBERS County NFIP Coordinator County of Hawaii Frank DeMarco, P.E., CFM (808) 961-8042 State NFIP Coordinator Carol Tyau-Beam (808) 587-0267
Disclaimer: The Department of Land and Natural Resources assumes no responsibility arising from the use of the information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the Department of Land and Natural Resources from any liability, which may arise from its use. Preliminary DFIRM Disclaimer: If this map has been identified as "PRELIMINARY", please note that it is being provided for commenting purposes only and is not to be used for official/legal decisions or regulatory compliance.	



LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 21, 2010

54319
LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RECEIVED
STATE PARKS DIV

10 SEP 22 A9:33

DEPT OF LAND &
NATURAL RESOURCES

MEMORANDUM

TO: DLNR Agencies:
☒ Div. of Aquatic Resources
☐ Div. of Boating & Ocean Recreation
☒ Engineering Division
☒ Div. of Forestry & Wildlife
☒ Div. of State Parks
☒ Commission on Water Resource Management
☒ Office of Conservation & Coastal Lands
☒ Land Division -Hawaii District

FROM: Charlene Unoki, Assistant Administrator

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement preparation Notice (EISPN)

LOCATION: Island of Hawaii

APPLICANT: Wilson Okamoto Corporation on behalf of SCD-TSA Kaloko Makai, LLC

RECEIVED
LAND DIVISION
2009 SEP 29 A 11:23
DEPT OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

Transmitted for your review and comment on the above referenced document. If you already received the document from Wilson Okamoto, we would appreciate your comments be submit by October 20, 2010.

Only 1 copy of the report available in Room 220.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- () We have no objections.
(✓) We have no comments.
() Comments are attached.

Signed: Charlene Unoki
Date: 9/28/10

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 21, 2010

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

MEMORANDUM

TO: DLNR Agencies:
☒ Div. of Aquatic Resources
☐ Div. of Boating & Ocean Recreation
☒ Engineering Division
☒ Div. of Forestry & Wildlife
☒ Div. of State Parks
☒ Commission on Water Resource Management
☒ Office of Conservation & Coastal Lands
☒ Land Division -Hawaii District

FROM: Charlene Unoki, Assistant Administrator

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement preparation Notice (EISPN)

LOCATION: Island of Hawaii

APPLICANT: Wilson Okamoto Corporation on behalf of SCD-TSA Kaloko Makai, LLC

RECEIVED
LAND DIVISION
2009 OCT -4 P 3:28
DEPT OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

Transmitted for your review and comment on the above referenced document. If you already received the document from Wilson Okamoto, we would appreciate your comments be submit by October 20, 2010.

Only 1 copy of the report available in Room 220.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- () We have no objections.
(✓) We have no comments.
() Comments are attached.

Signed: Charlene Unoki for AC
Date: 9/23/10

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 21, 2010

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT



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Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
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FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. Russell Y. Tsuji, Administrator
Land Division
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, HI 96809

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Tsuji:

Thank you for your letter dated October 21, 2010. We offer the following responses in the respective order of your comments:

Engineering Division

1. We acknowledge the project site is located in Zone X.
2. The Community Panel Number reference will be corrected in the Draft EIS.

Division of State Parks

We acknowledge the Division has no comments to offer at this time.

Division of Forestry and Wildlife

We acknowledge the Division has no comments to offer at this time.

Land Division, Hawaii District

We acknowledge the Division has no comments to offer at this time.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

MEMORANDUM

TO: DLNR Agencies:
☒ Div. of Aquatic Resources
☐ Div. of Boating & Ocean Recreation
☒ Engineering Division
☒ Div. of Forestry & Wildlife
☒ Div. of State Parks
☒ Commission on Water Resource Management
☒ Office of Conservation & Coastal Lands
☒ Land Division - Hawaii District

FROM: Charlene Unoki, Assistant Administrator

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement preparation Notice (EISPN)

LOCATION: Island of Hawaii

APPLICANT: Wilson Okamoto Corporation on behalf of SCD-TSA Kaloko Makai, LLC

Transmitted for your review and comment on the above referenced document. If you already received the document from Wilson Okamoto, we would appreciate your comments be submit by October 20, 2010.

Only 1 copy of the report available in Room 220.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

- () We have no objections.
(☒) We have no comments.
() Comments are attached.

Signed:
Date: 10.1.10

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

October 22, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania St., Suite 400
Honolulu, HI 96826

Dear Mr. Matsukawa:

Subject: Environmental Impact Statement Preparation Notice (EISP) for proposed Kaloko Makai project.

The Division of Aquatic Resources' comments on the above Preparation Notice relate to the potential deleterious effects the project may have on adjacent nearshore marine waters and coral reef communities. The proposed project's makai boundary is less than one mile from the ocean and associated coral reefs. Additionally, it is directly mauka of the northern portion of Kaloko-Honokōhau National Historical Park and Kaloko fishpond.

The project is also in an area with substantial submarine groundwater discharge (SGD). As documented in a recent U.S. Geological Survey Study of coastal waters adjacent to the project (Grossman et. al 2010), nearshore waters in this area are persistently influenced by brackish water plumes derived from submarine groundwater discharge. These plumes extend hundreds of meters offshore to depths of 5 m and may contain several million to hundreds of millions of gallons of brackish water. In essence, the nearshore areas directly makai of the project are estuarine.

As such, the project must be regarded as a coastal development with substantial potential to impact marine water quality and coastal ecosystems. As stated in the USGS report changes in groundwater discharge are expected to have significant impacts to the area's coastal ecosystems, including decreased freshwater outflow to brackish anchialine pools and coral reefs and increased nutrient and contaminant concentrations.

The EISP notes that a ground water resources and marine water quality assessment will be conducted for the Draft EIS to determine the anticipated impacts of the proposed project. Given the highly sensitive location of the project, in addition to a one-off water quality assessment, a rigorous long term monitoring program must be developed and implemented. The following concerns should be addressed in any such program. In 2004, the County of Hawaii contracted the Marine Science Department at the University of Hawai'i Hilo to evaluate monitoring data from development projects in West Hawai'i. Monitoring reports from 13 development projects were reviewed to evaluate water quality, microbiological, biological, geological and physical data collected during these projects. According to the report only three of the projects (Waikoloa, Natural Energy Laboratory of Hawaii Authority (NELHA) and Hokuli'a, contained sufficient data over a sufficient duration to evaluate temporal trends for water quality (and compliance

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
PAUL J. CONRY
ACTING FIRST DEPUTY
LENORE N. OHYE
ACTING DEPUTY DIRECTOR - WATER
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

EM

Mr. Earl Matsukawa
October 22, 2010
Page 2

with DOH water quality standards). None of the other developments had sufficient data for long-term analyses. For most of the developments we really don't know what environmental impacts may be occurring due to changes in water quality.

The UH researchers were thus forced to use water quality data only from Waikoloa, NELHA and Hokuli'a to evaluate effects of resort/residential development on coastal water quality. With regard to anchialine ponds which are easily affected by adjacent land use practices, nutrient concentrations in both the Waikoloa and Hokuli'a ponds were found to be often higher than concentrations measured in highly polluted rivers and estuaries. The researchers estimated that nutrient concentrations in the anchialine ponds at Waikoloa more than doubled since the resort's development. They noted that likely sources of the nutrients to these ponds were irrigation water enriched with treated sewage used to water development grounds (Waikoloa), dry fertilizers applied to golf courses (Waikoloa), and remnant nutrients from historical agriculture and cattle grazing (Hokuli'a).

They further found that historical nearshore water quality analyses from Waikoloa and Hokuli'a revealed that nitrogen parameters significantly increased at both developments over the past ten years. Specifically, total nitrogen (TN) and dissolved organic nitrogen (DON) concentrations increased 49% and 107% respectively, at Waikoloa from 1991 to 2002. At Hokuli'a, all nutrient parameters showed significant increases in concentrations from 1991 to 2001, with NO3 concentrations exhibiting the largest concentration increase of 410%. They state that results from the analyses are consistent with historical temporal trends for the sites, suggesting that conditions in West Hawai'i may be developing for extreme environmental degradation, possibly resulting in algal blooms like those in West Maui. We are already experiencing such degradation as evidenced by the unprecedented outbreak of cyanobacteria (blue-green alga) at Honaunau over the past couple of years.

We also know from additional work at nearby Honokōhau Bay (Parsons et al. 2008) that nutrient inputs have increased there over the years, and the early impacts of this increased nutrient loading are already evident in the coral reef community. It is predicted that at current nutrient-loading rates, the south sites of Honokōhau Bay will undergo further degradation in future years. If millions of additional gallons of wastewater are to be added to the outflow from the Kealahke Wastewater treatment plant as proposed, the environmental impacts and mitigation of such need to be fully addressed in the Environmental Impact Statement (EIS).

Finally the EISP is wholly deficient in addressing potential impacts of the project to coastal marine biological resources. As noted above such impacts may result from increased levels of nutrients and contaminants in nearshore waters. These may be either from the project area itself (e.g. irrigation) or wastewater effluent from the treatment plant's seepage pit directly above Honokōhau bay. Additionally, if and when the project is completed, there will be tens of thousands of people living in the area where now there are none. It is likely that a substantial number of these new residents will avail themselves of the ocean recreation opportunities, including fishing and harvesting, offered by the nearby coastal marine areas. The potential impacts of these activities on our marine resources are real and need to be fully considered and mitigated in the EIS.

Sincerely,

ROBERT T. NISHIMOTO, Ph.D.
Program Manager

7469-01
July 25, 2011



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Robert T. Nishimoto, Ph.D., Program Manager
Division of Aquatic Resources
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 330
Honolulu, HI 96809

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Nishimoto:

Thank you for your letter dated October 22, 2010. We offer the following responses in the respective order of your comments:

1. The forthcoming DEIS will include a discussion on groundwater impacts associated with the proposed project.
2. The forthcoming DEIS will include a discussion on nearshore and marine resources impacts associated with the proposed project.
3. Kaloko Makai will participate and develop a groundwater monitoring plan.
4. The Draft EIS will discuss the potential impact to ground water resources and the nearshore marine environment, including coastal marine biological resources.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

PAUL J. CONRY
ACTING FIRST DEPUTY

LENORE N. OHYE
ACTING DEPUTY DIRECTOR - WATER

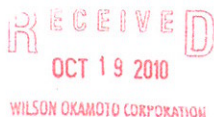
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIKOHAWI ISLAND RESERVE COMMISSION
LAND
STATE PARKS



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Artesian Plaza, Suite 400
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Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

ref:OCCL:MC

Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, HI 96826



Corr HA-11-60

OCT 18 2010

Dear Mr. Matsukawa,

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
Kaloko Makai Planned Community
Kaloko, North Kona, Hawaii
TMK (3) 7-3-009:017

The Office of Conservation and Coastal Lands (OCCL) has reviewed the Environmental Impact Statement Preparation Notice for the proposed Kaloko Makai development on the above subject parcels.

Approximately 224 acres of the project area is in the General Subzone of the State Land Use Conservation District; the applicant is proposing to reclassify them as Urban in order to proceed with the development of a master planned community.

HAR §13-5 states that the objective of the General Subzone is to designate open space where specific conservation uses may not be defined, but where urban use would be premature.

As stated in our earlier correspondences, OCCL would like to see the EIS more fully explain why the applicant feels that these objectives are no longer applicable to the parcel in question.

Please contact Michael Cain at 587-0048 should you have any questions on this matter.

Sincerely,

Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

7469-01
July 25, 2011

Mr. Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, HI 96809

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Lemmo:

Thank you for your letter dated October 28, 2010 (ref: OCCL:MC/Corr HA-11-60). We acknowledge that approximately 224 acres of the project area is designated Conservation District with a General Subzone designation. The Draft EIS will discuss how the project is in conformance with the Land Use Commission's decision-making criteria, Section 205-17, Hawaii Revised Statutes and Section 15-15-77, Hawaii Administrative Rules.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

CHIYOME L. FUKIRO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to
DOHCVHS

10005PSS.10

October 5, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

**Subject: Comments on the Environmental Assessment/Environmental Impact Statement
Preparation Notice for Kaloko Makai
Kaloko and Kohanaiki, North Kona, Island of Hawaii, Hawaii
TMK: (3) 7-3-009:017, 025, 026, and 028**

Dear Mr. Matsukawa:

The Department of Health (DOH), Clean Water Branch (CWB) has reviewed the subject document and offers these comments on the project. Please note that our review is based solely on the information provided in the subject document and its compliance with 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://www.hawaii.gov/health/environmental/cnv-planning/landuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:

- Antidegradation policy (HAR, Section 11-54-1.J), 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.
- Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
- Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2. You may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting the applicable Notice of Intent (NOI) forms:

- Storm water associated with construction activities, including excavation, grading, clearing, demolition, uprooting of vegetation, equipment staging, and storage areas that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities.
- Storm water associated with industrial activities.
- Discharges of hydrotesting water.
- Discharges of construction activity dewatering.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html>.


- For types of wastewater discharges not covered by an NPDES general permit or discharges to Class AA or Class 1 State waters, you may need an NPDES individual permit. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/indiv-index.html>. For your information, all waters within the Kaloko-Honokohau National Historical Park are classified as Class 1.
- Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage is 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. Earl Matsukawa
October 5, 2010
Page 3

10005PSS.10

If you have any questions, please visit our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,


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

SS:ml

c: DOH-EPO #I-3345 [via e-mail only]



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7469-01
July 25, 2011

Mr. Alec Wong, Chief
Clean Water Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801-3378

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Wong:

Thank you for your letter dated October 5, 2010 (10005PSS.10). We offer the following responses in the respective order of your comments:

1. The Draft EIS will state that the proposed project will comply with HAR, Chapters 11-54 and 11-55, as applicable.
2. and 3. Kaloko Makai encompasses approximately 1,139 acres and is located approximately one mile east (mauka) of the shoreline. The coastal waters fronting the project site are classified as "AA" marine waters. Honokohau Bay, located immediately south of the project site is classified as "A" marine waters.

A National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, will be required for the proposed project. A NPDES Individual Permit will be required, as the coastal waters are classified as "AA."

NPDES for industrial activities, hydrotesting or dewatering is not anticipated. If one is needed, separate Notice of Intent (NOI) forms for each type of discharge will be submitted at least 30 calendar days prior to the start of discharge activity.
4. We acknowledge that all discharges related to the construction and operation activities must comply with the State of Hawaii Water Quality Standards.



7469-01

Letter to Mr. Alec Wong

Page 2

July 25, 2011

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa". The signature is written in a cursive, flowing style.

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
File:



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www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. Wilfred K. Nagamine, Manager
Clean Air Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801-3378

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

RECEIVED
OCT 27 2010
WILSON OKAMOTO CORPORATION

October 26, 2010

10-801A CAB

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 S Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

SUBJECT: Kaloko Makai, EA/EIS Preparation Notice

A significant potential for fugitive dust emissions exists during all phases of construction. Proposed activities will occur in proximity to public areas and thoroughfares, thereby exacerbating potential dust problems.

We encourage the contractor to implement a dust control plan, which does not require approval by the Department of Health, and to comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. Dust control measures, some of which are mentioned in your document, include, but are not limited to, the following:

- Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- Providing an adequate water source at the site prior to start-up of construction activities;
- Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- Minimizing dust from shoulders and access roads;
- Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- Controlling dust from debris being hauled away from the project site.

If you have any questions, please contact Mr. Barry Ching of the Clean Air Branch at 586-4200.

Sincerely,

WILFRED K. NAGAMINE
Manager, Clean Air Branch

BC:smk

Dear Mr. Nagamine:

Thank you for your letter dated October 26, 2010 (10-801A CAB). Air quality impacts during construction of the project will be mitigated by complying with Department of Health (DOH) Hawaii Administrative Rules (HAR), Title 11, Chapter 60, Air Pollution. The mitigation measures you recommended will be mentioned in the Draft EIS and will be implemented, as appropriate, during construction.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF THE SUPERINTENDENT

October 15, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

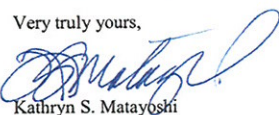
SUBJECT: Environmental Assessment/Environmental Impact Statement Preparation Notice,
Kaloko Makai, TMK (3) 7-3-09:017, 025, 026, and 028,
Kaloko and Kohanaiki, North Kona, Hawaii

The Department of Education (DOE) has reviewed the Environmental Impact Statement Preparation Notice for the proposed Kaloko Makai project. The DOE has the following comments:

1. Impact and Impact Fees. Kaloko Makai will have a significant impact of the DOE's facilities in West Hawaii. Kaloko Makai is within the boundaries of the West Hawaii School Impact Fee District and will be subject to impact fees by the DOE. The fee amount will depend on the number of single-family and multi-family units in the project. The DOE requests additional information regarding the proposed mix of single-family and multi-family units.
2. School Sites. The conceptual land use plan for the project has two elementary school sites and one middle school site. However, as shown on the conceptual land use plan, a portion of the middle school site appears to be outside of the boundary of the project. Does the developer plan to acquire the portion of land outside the boundary of the project?
3. Phasing. The DOE would like to know any planned phasing for the project, and how that phasing relates to its school sites.
4. Discussion with Developer. The developer should meet with the DOE prior to the publication of the Draft Environmental Impact Statement to discuss and enter into an agreement regarding the school sites and impact fees.

Thank you for the opportunity to provide comments. If you have any questions, please call Jeremy Kwock of the Facilities Development Branch at 377-8301.

Very truly yours,


Kathryn S. Matayoshi
Superintendent

KSM:to

c: Art Souza, CAS, Honokaa/Kealahou/Kohala/Konawaena Complex Areas

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER

XXXXXXXXXXXXXXXXXXXX
KATHRYN S. MATAYOSHI
SUPERINTENDENT

RECEIVED
OCT 19 2010
WILSON OKAMOTO CORPORATION


WILSON OKAMOTO
CORPORATION
ENGINEERS / PLANNERS / CONSULTANTS
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Artesian Plaza, Suite 400
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www.wilsonokamoto.com

7469-01
July 25, 2011

Ms. Kathryn Matayoshi, Superintendent
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, HI 96804

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Ms. Matayoshi:

Thank you for your letter dated October 15, 2010. We offer the following responses in the respective order of your comments:

1. Impact and Impact Fees: We acknowledge the proposed project will be subject to impact fees by the Department of Education (DOE). The Draft EIS will include information on the number of single-family and multi-family units.
2. School Sites: The conceptual land plan in the EISP identified sites for two elementary schools and one middle school. Since the EISP, the schools sites have been relocated to lie within the Kaloko Makai project boundary.
3. Phasing: Kaloko Makai will be developed in three phases over the 30 years. A phasing plan will be included in the Draft EIS.
4. Kaloko Makai met with DOE Planning staff on July 21, 2011 to consult with DOE and discuss appropriate school impact fees.

We appreciate your participation in the environmental review process.

Sincerely,


Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

PHONE (808) 594-1888



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

FAX (808) 594-1865

COPY

HRD10/3552D

October 21, 2010

Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

**RE: Environmental Impact Statement Preparation Notice
Kaloko Makai Development Project
Kaloko and Kohanaiki, North Kona, Hawaii Island**

Aloha e Earl Matsukawa,

The Office of Hawaiian Affairs (OHA) is in receipt of your September 17, 2010 request for comments on an Environmental Impact Statement Preparation Notice (EISP) for the proposed SCD-TSA Kaloko Makai, LLC Development Project (project).

The forthcoming draft environmental impact statement (DEIS) will be the primary support document for a petition to the State Land Use Commission (LUC) requesting a District Boundary Amendment (DBA) and the reclassification of 224.430 acres from State Conservation to Urban and 727.735 acres from Agricultural to Urban. The DEIS will also serve to support any future use of State or County lands or funds during the development of the project. The full extent of such uses is unknown at this time. The LUC will be the accepting authority for the DEIS.

The project area will be situated on 1,142 acres of land, which includes the 952.165 acre LUC petition area. The EISP details that at full build out, Kaloko Makai is envisioned to be a low and medium density residential community consisting of up to 5,000 single and multi-family units with commercial retail centers, recreational facilities and open spaces (including a 150 acre forest preserve), archaeological and cultural preserves, schools, a medical facility and associated infrastructure. The project will include an affordable housing component developed pursuant to County of Hawaii requirements.

Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
October 21, 2010
Page 2 of 3

OHA recognizes that in concept, this project supports the broad goals, policies and standards of the Hawaii County General Plan and elements of the Kona Community Development Plan. OHA respectfully asserts that the laudable aspects of any development project that has the potential to provide much needed employment, affordable housing and public services must be carefully balanced with the long term impacts that development will have on regional infrastructure, cultural landscapes and the quality of life for those who live within a given community.

The geographic area between Lanihau and Kalaoa Ahupua'a has been subject to intense development in recent years with additional projects planned into the foreseeable future as the urban center of North Kona is shifted away from Kailua Town. While conceptually providing the potential for relief, each new development provides constant pressure on regional infrastructure, resources and public services. We look forward to seeing the DEIS comprehensively analyzing this issue and offering mitigation measures that contribute to a new development paradigm.

In general, OHA opposes LUC reclassifications which result in the loss of agricultural lands with the potential to be productive to urban development. One of the fundamental objectives of the State Agricultural Function Plan (1991) is to encourage and develop diversified agriculture throughout Hawaii which will support our local economy and contribute to reducing our dependence on imported products. We firmly believe this objective can be obtained by protecting and prioritizing initiatives on agricultural lands with the highest potential for productivity.

The majority (73%) of the project area has received a Land Study Bureau Overall Productivity rating of "E", representing the lowest possible agricultural productivity rating. Nearly 94% of the project area is not classified as Agricultural Lands of Importance in the State of Hawaii. With this in mind, OHA acknowledges that if approved this reclassification will not have a significant impact on agricultural endeavors in Hawaii.

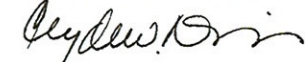
The DEIS should specifically discuss the impacts the reclassification the 224.430 acre parcel (parcel) from Conservation to Urban. This parcel is located directly across Queen Ka'ahumanu Highway from Kaloko-Honokohau National Historical Park and development has the potential to directly impact view planes and the water quality of Kaloko and Aimakapa fishponds. While the current classification of the 150 acres of land which will be designated as a forest reserve is unclear to us at this time, if it is currently Conservation, we urge consideration of allowing it to remain so. If the forest reserve area is not Conservation at this time, we urge consideration of classifying it as such via the pending LUC petition.

We are pleased to see that an archaeological inventory survey and cultural impact assessment will be conducted and incorporated into the DEIS. OHA applauds the developer for affording consideration to the preservation of cultural sites situated within and the historic trail which traverses the project area. OHA is aware that the preservation of the segment of this trail and cultural sites which are situated within the "Kaloko Heights" development (which is immediately adjacent to the project area) were major concerns to the Kona community. We look forward to seeing an archaeological inventory survey and appropriate mitigation plans reviewed

and approved by the Department of Land and Natural Resources- State Historic Preservation Division.

In addition to the agencies and parties listed as being consulted within Section 8 of the EISPN, we hope you will engage in a broad and proactive public outreach effort during the development of the DEIS. Thank you for the opportunity to provide comments and we look forward to reviewing the DEIS. Should you have any questions, please contact Keola Lindsey at 594-0244 or keolal@oha.org.

'O wau iho nō me ka 'oia 'i'o,



Clyde W. Nāmu'o
Chief Executive Officer

C: OHA Trustee Robert K. Lindsey, Jr.
OHA- West Hawai'i Community Resources Coordinator



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Honolulu, Hawaii, 96826 USA
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www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. Clyde M. Namuo, Administrator
Office of Hawaiian Affairs
State of Hawaii
711 Kapiolani Boulevard, Suite 500
Honolulu, HI 96813

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Namuo:

Thank you for your letter dated October 21, 2010 (HRD10/3552D). We offer the following responses in the respective order of your comments:

1. According to the ALISH, approximately 6 percent of the project site is designated "other" and the remainder of the project site is not classified. Kaloko Makai will not have an impact on agriculturally significant lands. A discussion and maps on ALISH and LSB ratings and designations for the project site will be included in the Draft EIS.

We acknowledge OHA's concurrence that the proposed project will not have a significant impact on agricultural lands and endeavors.

2. We concur that approximately 224 acres of the project area is designated Conservation District with a General Subzone designation. The Draft EIS will discuss how the project is in conformance with the Land Use Commission's decision-making criteria, Section 205-17, Hawaii Revised Statutes and Section 15-15-77, Hawaii Administrative Rules.

Flora and fauna surveys have been conducted for the project site. The findings of these surveys will be summarized and reports reproduced in their entirety in the Draft EIS. Potential impacts and mitigation measures will be discussed.

Kaloko Makai has been working with the US Fish & Wildlife Service and the Department of Land and Natural Resources on the delineation and preservation of the 150 acre native dryland forest. It has been determined that the project may cause the taking of two listed plant species ('aiea and hala pepe) and one candidate species (ko'oko'olau). As a result, Kaloko Makai has prepared a Habitat Conservation Plan (HCP) to develop short- and long-term management measures to protect these species.

3. An archaeological inventory survey and a cultural impact assessment have been prepared and will be included in the Draft EIS. Related impacts and mitigation measures will be discussed.



7469-01

Letter to Mr. Clyde M. Namuo

Page 2

July 25, 2011

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
P.O. BOX 1879
HONOLULU, HAWAII 96805

EM
KAULANA H. R. PARK
CHAIRMAN
HAWAIIAN HOME LANDS COMMISSION
ANTHA S. WONG
DEPUTY TO THE CHAIRMAN
ROBERT J. HALL
EXECUTIVE ASSISTANT

October 7, 2010

RECEIVED
OCT 14 2010

WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Environmental Assessment Preparation Notice, Kaloko
Makai, Kaloko and Koanaiki, North Kona, Hawaii

Mahalo for your letter of September 17, 2010, providing an
opportunity to comment on the subject project.

The department has major landholdings to the south (Kealakehe)
and north (Kalaoa) of Kaloko and Koanaiki. The department is
concerned about major infrastructure running north - south,
serving this region, and recommend that the final Environmental
Assessment include a discussion on:

1. Means of financing the Ane Keohokalole Highway which
should be extended from Kealakehe to Kalaoa.
2. Improvements to the North Kona Water System may be needed
to accommodate more growth. Kaloko Makai water
improvements should be coordinated with other developers,
including Hawaiian home lands at Kealakehe.
3. The wastewater plant at Kealakehe may require expansion
to accommodate Kaloko Makai. The community has expressed
concerns about odors from the wastewater plant. Discuss
measures to be taken to eliminate this problem.
4. A major community and social services center is planned
for Kealakehe which will serve the entire region. To the
extent that Kaloko Makai will generate the need for more

Mr. Earl Matsukawa
October 7, 2010
Page 2

Services, the developer should consider a community
benefits package to support this effort.

If you have any questions, please contact Darrell Yagodich,
Planning Program Manager, at 620-9481.

Aloha and mahalo,

Kaulana H.R. Park, Chairman
Department of Hawaiian Home Lands

Cc: Bo Kahui, Laiopua 2020
Dora Aio-Leamons, Kaniohale at the Villages of Laiopua



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7469-01
July 25, 2011

Mr. Albert "Alapaki" Nahale-a Chairman
Department of Hawaiian Home Lands
State of Hawaii
PO Box 1879
Honolulu, HI 96805

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Nahale-a:

Thank you for your letter dated October 7, 2010. We offer the following responses in the respective order of your comments:

1. Ane Keohokalole Highway: Phase 1, Palani Road to Hina Lani is under construction. Kaloko Makai will construct Ane Keohokalole from Hina Lani to Hulikoa Road. We understand that further extension of Ane Keohokalole will be achieved through a combination of public and private funding.
2. North Kona Water System: Kaloko Makai's water demand will require additional water source, storage and transmission facilities, which will be privately constructed in conjunction with the project. These facilities will be developed in coordination with the County Department of Water Supply.

Kaloko Makai is investigating several alternatives for its potable water needs. The Draft EIS will discuss water resources and the potential impact to groundwater resources and the nearshore marine environment.

3. Wastewater: In the event connection to a public wastewater system is not available, Kaloko Makai will construct and operate a private Wastewater Treatment Plant (WWTP) to serve the development within the project. It will treat the wastewater to produce reclaimed (R-1) water for general irrigation within Kaloko Makai, thus lessening demand for potable water. The Draft EIS will discuss potential impacts and mitigation measures associated with the wastewater treatment and reuse.
4. Community Benefits Package: Kaloko Makai will be setting aside land for a hospital, judiciary complex, three school sites, and fire/police station. In addition, Kaloko Makai will also be preserving the 150-acre dryland forest and historic trails. These proposed actions will benefit the surrounding community.



7469-01
Letter to Mr. Albert "Alapaki" Nahale-a
Page 2
July 25,, 2011

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

William P. Kenoi
Mayor



County of Hawai'i
Office of the Mayor

25 Aupuni Street, Suite 2603 • Hilo, Hawai'i 96720 • (808) 961-8211 • Fax (808) 961-6553
KONA: 75-5722 Hanama Place, Suite 102 • Kailua-Kona, Hawai'i 96740
(808) 327-3602 • Fax (808) 326-5663

William T. Takaba
Managing Director

Walter K.M. Lau
Deputy Managing Director

RECEIVED
OCT 12 2010
WILSON OKAMOTO CORPORATION



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. William P. Kenoi, Mayor
Office of the Mayor
County of Hawaii
25 Aupuni Street
Hilo, HI 96720

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

October 8, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, HI 96826

Subject: Environmental Assessment/Environmental Impact Statement Preparation
Notice
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawai'i
TMK: (3) 7-3-09: 017, 125, 026 and 028

Dear Mr. Matsukawa:

Thank you for the opportunity to review the EISP for the Kaloko Makai project being proposed by Stanford Carr Development LLC. We have had the pleasure to work with SCD during the last six months on a feature of this property, the dryland forest preserve, which is adjacent to the Ane Keohokalole Highway, now under construction by the County of Hawai'i. SCD's commitment to the protection of this preserve is indisputable.

We have no comments at this time, but would like to reserve the right to comment when the draft environmental impact statement is issued for this project.

Aloha,

Billy Kenoi
MAYOR

Dear Mr. Kenoi:

Thank you for your letter dated October 8, 2010. We appreciate your past support and look forward continuing to work with the County, Department of Land and Natural Resources and US Fish & Wildlife Service in delineating and preserving the 150-acre native dryland forest. While you have no additional comments at this time, your further input as this project proceeds is welcome.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

William P. Kenoi
Mayor



BJ Leithhead Todd
Planning Director

Margaret K. Masunaga
Deputy Planning Director

County of Hawaii

PLANNING DEPARTMENT

Aupuni Center • 101 Puuhii Street, Suite 3 • Hilo, Hawaii 96720
Phone (808) 961-8288 • Fax (808) 961-8742

October 21, 2010

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826

Post-it® Fax Note	7671	Date	3/20/11	# of Pages	3
To	Tracy Fukuda	From	Dianne Bugado		
Co/Dcpt	Wilson Okamoto	Co.	COH - Planning		
Phone #		Phone #	327-770		
Fax #	946-2263	Fax #	527-563		

Dear Mr. Matsukawa:

Re: Preparation Notice for an Environmental Impact Statement (EIS)
Kaloko Makai
TMK: (3) 7-3-009:017, 025, 026 and 028

This is to acknowledge receipt of your September 17, 2010 letter requesting our comments on the proposed Kaloko Makai project. We have reviewed the EIS preparation notice for the Kaloko Makai project and have the following comments to offer:

1. Parcel 7-3-009:017 is designated Conservation by the State Land Use Commission. It is zoned Agricultural (A-5a) by the County. According to the Land Use Pattern Allocation Guide Map of the General Plan, the parcel is designated Urban Expansion.
2. Parcel 7-3-009:025 is designated Urban and Agricultural by the State Land Use Commission. It is zoned Agricultural (A-5a) by the County. According to the Land Use Pattern Allocation Guide Map of the General Plan, the parcel is designated Urban Expansion.
3. Parcel 7-3-009:026 is designated Agricultural by the State Land Use Commission. It is zoned Agricultural (A-5a) by the County. According to the Land Use Pattern Allocation Guide Map of the General Plan, the parcel is designated Urban Expansion.
4. Parcel 7-3-009:028 is designated Agricultural by the State Land Use Commission. It is zoned Agricultural (A-5a) by the County. According to the Land Use Pattern Allocation Guide Map of the General Plan, the parcel is designated Conservation and Urban Expansion.
5. This parcel is not located in the County's Special Management Area. Therefore, Special Management Area rules and regulations are not applicable.
6. The Kona Community Development Plan has designated the proposed parcels in the Kona Urban Area and have further designated a Transit Oriented Development for this area. The project falls within the KCDP's "C" Concurrency Zone.

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Mr. Earl Matsukawa, Wilson Okamoto, Kaloko Makai
10/21/10
Page 2 of 3

7. The Project Description states that a Hospital/Medical Center will be provided and there is an anticipated "upgrade" to a Regional Center designation for the project's Transit Oriented Development, however the Department cannot support such a change without a firm/written commitment with a medical service.
8. Special Permit No. 499 was issued to the Hawaii County Police Department in 1981 for a pistol shooting range within the property owned by Lanihau Properties (TMK 7-4-008:005) which is located just south of the Kaiko Makai project site. Please contact Lanihau Properties or the Police Department to determine if this shooting range is still in operation, as noise from it may negatively impact the residents of the proposed development.
9. Since March 2008, emissions of SO₂ from Halema'uma'u have increased significantly. Therefore, the air quality analysis being prepared for the EIS should use the most current State DOH air quality monitoring data.
10. Will the historic trail (the Road to the Sea) be split by the mid-level road, or will there be a grade separation to allow pedestrians to walk its entire length?
11. The General Plan identifies the view plane along Queen Ka'ahumanu Highway going mauka and makai as an area of natural beauty because of its openness and expansiveness. The EIS should show how the proposed project will affect the sense of openness in this area by including photographic simulations of the project from various view points along the highway.
12. The TIAR should contain the information required in Zoning Code Section 25-2-46 (enclosed), and include an analysis of the proposed project on the regional roadway system. In addition, to provide the most accurate determination of level of service (LOS) at study intersections, the TIAR should include the following methods: take on-ground time delay studies, determine the queue lengths when traffic counts are taken, and adjust the saturated flow in the modeling software until the queue lengths and the time delay match the actual on-ground conditions.
13. Lastly, we recommend you consult with the State DLNR, Division of Forestry and Wildlife, Na Ala Hele Program regarding the historical trail that runs through the property.

Thank you for requesting our participation in the EIS preparation process. Please provide this office with a copy of the EIS upon its publication. Should you have questions, please contact Deanne Bugado at 327-3510.

Sincerely,

BJ LEITHEAD TODD
Planning Director

Mr. Earl Matsukawa, Wilson Okamoto, Kaloko Makai
10/21/10
Page 3 of 3

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K:\Staff\Deanna\Letters\Prep-Notice EIS - Kaloko Makai.doc

Enclosure

cc: Mr. Daryn Arai, Planning Division
Planning Department- Kona



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7469-01
July 25, 2011

Ms. Bobby Jean Leithead-Todd, Director
Planning Department
County of Hawaii
Aupuni Center
101 Pauahi Street, Suite 3
Hilo, HI 96720

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Ms. Leithead-Todd:

Thank you for your letter dated October 21, 2010. We offer the following responses in the respective order of your February 13, 2008 comments:

1. We acknowledge that Parcel 7-3-009: 017 is designated Conservation by the State Land Use Commission (SLUC), zoned Agricultural (A-5a) by the County, and designated Urban Expansion according to Land Use Pattern Allocation Guide Map (LUPAG).
2. We acknowledge that Parcel 7-3-009: 025 is designated Urban and Agricultural by the State Land Use Commission (SLUC), and designated Urban Expansion according to Land Use Pattern Allocation Guide Map (LUPAG). The parcel is zoned Open by the County.
3. We acknowledge that Parcel 7-3-009: 026 is designated Agricultural by the State Land Use Commission (SLUC), zoned Agricultural (A-5a) by the County, and designated Urban Expansion according to Land Use Pattern Allocation Guide Map (LUPAG).
4. We acknowledge that Parcel 7-3-009: 028 is designated Agricultural by the State Land Use Commission (SLUC), zoned Agricultural (A-5a) by the County, and designated Urban Expansion and Conservation according to Land Use Pattern Allocation Guide Map (LUPAG).
5. We acknowledge that the project site is not located in the County's Special Management Area (SMA). Therefore, SMA rules and regulations are not applicable.
6. We acknowledge that the project site is located within the Kona Community Development Plan's (CDP) Kona Urban Area; is designated a Transit Oriented Development; and located within Concurrency Zone "C."



7469-01

Letter to Ms. Bobby Jean Leithead-Todd

Page 2

July 25, 2011

7. Kaloko Makai is setting aside land for a Hospital/Medical Center. We acknowledge that Kaloko Makai is designated as a Neighborhood TOD, and the County will not "upgrade" to a Regional TOD, until there is a firm commitment with a medical service.
8. We will contact Lanihau Partners and/or the County Police Department to determine if they are still proposing a pistol shooting range on TMK 7-4-008:005.
9. An air quality study is being prepared for the project and will be included in the Draft EIS. The analysis will use the most current State DOH air quality monitoring data.
10. The historic Kohanaiki Trail (Road to the Sea) will be preserved. We continue to consult with Na Ala Hele and the National Park Service, Ala Kahakai National Historic Trail on the alignment of the trail through the project site. Ane Keohokalole Highway will cross the trail.
11. We acknowledge that the General Plan identifies the view plane along Queen Kaahumanu going mauka and makai as an area of natural beauty. The Draft EIS will include a discussion on visual impacts.
12. The Draft EIS will include a Traffic Impact Assessment Report (TIAR) that will address access and traffic issues, as well as provide mitigation measures regarding potential adverse impacts.
13. As stated previously, we continue to consult with Na Ala Hele, the National Park Service, Ala Kahakai National Historic Trail on the alignment of the Kohanaiki Trail (Road to the Sea) through the project site.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

345 KĒKŪANAŌ'A STREET, SUITE 20 • HILO, HAWAII 96720
TELEPHONE (808) 961-8050 • FAX (808) 961-8657

October 25, 2010

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826

RECEIVED
OCT 27 2010

WILSON OKAMOTO CORPORATION

ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

APPLICANT: SCD – TSA KALOKO MAKAI, LLC
TAX MAP KEY 7-3-009:017, 025, 026, AND 028

We have reviewed the subject Environmental Impact State Preparation Notice and have the no further comments at this time. Our comments, noted in our February 13, 2008 letter to the County of Hawaii, Planning Department regarding the applicant's State Land Use Boundary Amendment (A07-778) for the subject project, remains unchanged. A copy of our February 13, 2008 letter is enclosed for your information.

Should there be any questions, you may contact Mr. Finn McCall of our Water Resources and Planning Branch at 961-8070, extension 255.

Sincerely yours,

Milton D. Pavao, P.E.
Manager

FM:dfg

Enc.

copy – SCD – TSA Kaloko Makai, LLC

... Water, Our Most Precious Resource ... *Kā Wai A Kāne* ...

The Department of Water Supply is an Equal Opportunity provider and employer.



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

345 KĒKŪANAŌ'A STREET, SUITE 20 • HILO, HAWAII 96720
TELEPHONE (808) 961-8050 • FAX (808) 961-8657

February 13, 2008

TO: Mr. Christopher J. Yuen, Planning Director
Planning Department

FROM: Milton D. Pavao, Manager

SUBJECT: **STATE LAND USE BOUNDARY AMENDMENT A07-778 AND ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE**
APPLICANT – SCD KALOKO MAKAI, LLC
REQUEST: CONSERVATION AND AGRICULTURAL TO URBAN
TAX MAP KEY 7-3-009:017, 025 (PORTION), 026, AND 028

We have reviewed the subject Petition for State Land Use Boundary Amendment and Environmental Impact State Preparation Notice and have the following comments.

Please be informed that the Department's existing water system cannot support the proposed development at this time. Extensive additions and improvements would be required, which may include, but not be limited to, source, storage, booster pumps, transmission, and distribution facilities. Currently, funding is not available and no time schedule is set for such improvements by the Department.

The Department has no objection to the proposed request, subject to the applicant providing the offsite and onsite water system improvements necessary to adequately serve the development. All elements of the offsite and onsite water system improvements shall be constructed in accordance with the Department's Water System Standards and Rules and Regulations. Further, the improvements must be properly accepted by and dedicated to the Water Board before water service can be granted.

The developer will be required to enter into a Water Development Agreement with the Water Board in order to establish, among other things, the scope of the water system improvements needed to support the development, water allocation from any newly developed sources, and timeline for completion of said improvements. The Department will provide its comments on the scope of the necessary water system improvements upon review of the Preliminary Engineering Report to be submitted with the Draft Environmental Impact Statement.


... Water brings progress ...

The Department of Water Supply is an Equal Opportunity provider and employer. To file a complaint of discrimination, write: USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW, Washington DC 20250-9410. Or call (202) 720-5964 (voice and TDD)

Mr. Christopher J. Yuen, Planning Director
Page 2
February 13, 2008

Should there be any questions, you may contact Mr. Finn McCall of our Water Resources and Planning Branch at 961-8070, extension 255.

Sincerely yours,


Milton D. Pavao, P.E.
Manager

FM:dfg

copy – SCD Kaloko Makai, LLC
Carlsmith Ball LLP
Wilson Okamoto Corporation
State of Hawaii, State Land Use Commission



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
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7469-01
July 25, 2011

Mr. Milton Pavao, Manager
Department of Water Supply
County of Hawaii
345 Kekuanaoa St., Suite 20
Hilo, HI 96720

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

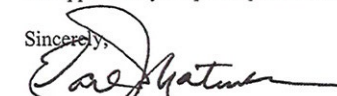
Dear Mr. Pavao:

Thank you for your letter dated October 25, 2010. We acknowledge that you have no comments to offer at this time and your previous comments dated February 13, 2008 remains unchanged. We offer the following responses in the respective order of your February 13, 2008 comments:

1. We acknowledge the Department's existing water system cannot support the proposed project at this time.
2. Kaloko Makai's water demand will require additional water source, storage and transmission facilities. The proposed project will construct the required water system facilities. Kaloko Makai is investigating several alternatives for its potable water needs. The Draft EIS will discuss water resources and the potential impact to ground water resources and the nearshore marine environment.
3. On-site and off-site water improvements shall be constructed in accordance with the Department's Water System Standards and Rules and Regulations.
4. We acknowledge Kaloko Makai will be required to enter into a Water Development Agreement with the Water Board in order to establish, among other things, the scope of water system improvements needed to support the proposed project.

We appreciate your participation in the environmental review process.

Sincerely,


Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

William P. Kenoi
Mayor

William T. Takaba
Managing Director



County of Hawai'i
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

25 Aupuni Street • Hilo, Hawai'i 96720
(808) 961-8083 • Fax (808) 961-8086
http://co.hawaii.hi.us/directory/dir_envmg.htm

Frank J. DeMarco, P.E.
Director

Ivan M. Torigoe
Deputy Director



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7469-01
July 25, 2011

Mr. Frank J. DeMarco, P.E., Director
Department of Environmental Management
County of Hawaii
25 Aupuni Street
Hilo, HI 96720

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. DeMarco:

Thank you for your letter dated October 13, 2010. At the appropriate phase project design and development, a Solid Waste Management Plan will be prepared and submitted to the Solid Waste Division.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

October 13, 2010

Wilson Okamoto Corporation
1907 South Beretania
Honolulu, HI 96826

Attention: Mr. Earl Matsukawa, AICP
Project Manager

RE: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawai'i
TMK:7-3-09:017, 025, 026 and 028

Dear Mr. Matsukawa,

We offer the following comments:

Solid Waste Division

Please submit a Solid Waste Management Plan in accordance with enclosed guidelines.

Thank you for allowing us to review and comment on this project.

Sincerely,

Frank J. DeMarco, P.E.
DIRECTOR

enclosure

cc: SWD



William P. Kenoi
Mayor



County of Hawai'i

POLICE DEPARTMENT
349 Kapi'olani Street • Hilo, Hawai'i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

Harry S. Kubojiri
Police Chief

Paul K. Ferreira
Deputy Police Chief

EM



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. Harry S. Kubojiri, Chief of Police
Police Department
County of Hawaii
349 Kapiolani Street
Hilo, HI 96720

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

October 11, 2010

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii 96826

RECEIVED
OCT 15 2010
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

The above-referenced Environmental Impact Statement Preparation Notice (EISP) for the proposed Kaloko Makai project has been reviewed, and we have the following concerns.

A development of this size will increase traffic on all roadways associated with the development. Major roadways affected will include Hina Lani Street, Mamalahoa Highway, Queen Kaahumanu Highway, and Palani Road. We request the opportunity to comment on the Traffic Impact Assessment Report (TIAR), upon its completion.

The EISP also acknowledges that the proposed project will require an increase in police staffing and possible expansion of existing police facilities. Funding for these required increases should be identified and addressed.

Thank you for the opportunity to comment. Should you have any questions, please contact Major Randy Apele, Area II Operations, at (808) 326-4646 ext. 270.

Sincerely,

HARRY S. KUBOJIRI
POLICE CHIEF

HENRY J. TAVARES JR.
ASSISTANT POLICE CHIEF
AREA II OPERATIONS

RA:dmv
RS100754

"Hawai'i County is an Equal Opportunity Provider and Employer"

Dear Mr. Kubojiri:

Thank you for your letter dated October 11, 2010. The Draft EIS will include a Traffic Impact Assessment Report (TIAR) addressing access and traffic issues, as well as recommend mitigation measures regarding potential adverse impacts.

Kaloko Makai will coordinate with the Police Department to address service capabilities of police operations, address concerns, and develop appropriate mitigation measures, as appropriate.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

William P. Kenoi
Mayor



County of Hawai'i
HAWAII FIRE DEPARTMENT
25 Aupuni Street • Suite 2501 • Hilo, Hawai'i 96720
(808) 932-2900 • Fax (808) 932-2928

Darryl J. Oliveira
Fire Chief

Glen P. I. Honda
Deputy Fire Chief

RECEIVED
OCT 22 2010
WILSON OKAMOTO CORPORATION

Earl Matsukawa
October 11, 2010
Page 2

October 11, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawai'i 96826

SUBJECT: ENVIRONMENTAL ASSESSMENT (EA)/ENVIRONMENTAL IMPACT
STATEMENT PREPARATION NOTICE (EISPN)
KALOKO MAKAI
KALOKO AND KOHANA'IKI, NORTH KONA, HAWAII
TMK: (3) 7-3-09:017, 025, 026 AND 028

In regards to the above-mentioned environmental assessment and environmental impact statement preparation notice, the following shall be in accordance:

Fire apparatus access roads shall be in accordance with UFC Section 10.207:

"Fire Apparatus Access Roads

"Sec. 10.207. (a) General. Fire apparatus access roads shall be provided and maintained in accordance with the provisions of this section.

"(b) Where Required. Fire apparatus access roads shall be required for every building hereafter constructed when any portion of an exterior wall of the first story is located more than 150 feet from fire department vehicle access as measured by an unobstructed route around the exterior of the building.

"EXCEPTIONS: 1. When buildings are completely protected with an approved automatic fire sprinkler system, the provisions of this section may be modified.

"2. When access roadways cannot be installed due to topography, waterways, nonnegotiable grades or other similar conditions, the chief may require additional fire protection as specified in Section 10.301 (b).



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"3. When there are not more than two Group R, Division 3 or Group M Occupancies, the requirements of this section may be modified, provided, in the opinion of the chief, fire-fighting or rescue operations would not be impaired.

"More than one fire apparatus road may be required when it is determined by the chief that access by a single road may be impaired by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.

"For high-piled combustible storage, see Section 81.109.

"(c) Width. The unobstructed width of a fire apparatus access road shall meet the requirements of the appropriate county jurisdiction.

"(d) Vertical Clearance. Fire apparatus access roads shall have an unobstructed vertical clearance of not less than 13 feet 6 inches.

"EXCEPTION: Upon approval vertical clearance may be reduced, provided such reduction does not impair access by fire apparatus and approved signs are installed and maintained indicating the established vertical clearance.

"(e) Permissible Modifications. Vertical clearances or widths required by this section may be increased when, in the opinion of the chief, vertical clearances or widths are not adequate to provide fire apparatus access.

"(f) Surface. Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be provided with a surface so as to provide all-weather driving capabilities." (20 tons)

"(g) Turning Radius. The turning radius of a fire apparatus access road shall be as approved by the chief." (45 feet)

"(h) Turnarounds. All dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with approved provisions for the turning around of fire apparatus.

"(i) Bridges. When a bridge is required to be used as access under this section, it shall be constructed and maintained in accordance with the applicable sections of the Building Code and using designed live loading sufficient to carry the imposed loads of fire apparatus.

"(j) Grade. The gradient for a fire apparatus access road shall not exceed the maximum approved by the chief." (15%)

Earl Matsukawa
October 11, 2010
Page 3

"(k) **Obstruction.** The required width of any fire apparatus access road shall not be obstructed in any manner, including parking of vehicles. Minimum required widths and clearances established under this section shall be maintained at all times.

"(l) **Signs.** When required by the fire chief, approved signs or other approved notices shall be provided and maintained for fire apparatus access roads to identify such roads and prohibit the obstruction thereof or both."

Water supply shall be in accordance with UFC Section 10.301(c):

"(c) **Water Supply.** An approved water supply capable of supplying required fire flow for fire protection shall be provided to all premises upon which buildings or portions of buildings are hereafter constructed, in accordance with the respective county water requirements. There shall be provided, when required by the chief, on-site fire hydrants and mains capable of supplying the required fire flow.

"Water supply may consist of reservoirs, pressure tanks, elevated tanks, water mains or other fixed systems capable of providing the required fire flow.

"The location, number and type of fire hydrants connected to a water supply capable of delivering the required fire flow shall be protected as set forth by the respective county water requirements. All hydrants shall be accessible to the fire department apparatus by roadways meeting the requirements of Section 10.207.


DARRYL OLIVEIRA
Fire Chief

RP:lpc



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. Darryl J. Oliveira, Fire Chief
Fire Department
County of Hawaii
25 Aupuni Street
Hilo, HI 96720

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Oliveira:

Thank you for your letter dated October 11, 2010. Within the Kaloko Makai project, fire apparatus access roads shall be developed in accordance with Uniform Fire Code Section 10.207 and the water supply for fire protection shall be developed in accordance with UFC Section 10.301(c).

We appreciate your participation in the environmental review process.

Sincerely,



Earl Matsukawa, AICP
Project Manager

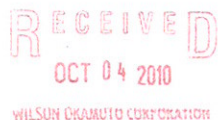
cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission



EM
TF

October 1, 2010

Wilson Okamoto Corporation
Attn: Mr. Earl Matsukawa, AICP
1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, HI 96826



Gentlemen:

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
TMK: 7-3-009:017, 025, 026 and 028
Kaloko Makai, North Kona, Island of Hawaii

Thank you for the opportunity to comment on the subject's Environmental Impact Statement Preparation Notice (EISPN). HELCO will be able to provide electrical service to the proposed development in North Kona. A detailed analysis will be performed after the receipt of the consultant's detailed design drawings and estimated load. The following is a summary of our comments:

1. Generation capacity – HELCO's current system peak load is 194,600kW and our total generation system capability is 285,800kW. Our reserve margin is 37% and may have adequate generation to serve the above.
2. Electrical Substation – The area is served by our existing Kaloko electrical substation and a 12,470 volt underground distribution along Hina Lani Street. The capacity of our existing substation is not adequate to serve the anticipated load. A lot with a minimum size of 250' x 250' must be deeded to HELCO for the construction of a new substation.
3. Off-Site Electrical Transmission System – The existing 69,000 volt transmission line along Queen Kaahumanu Highway will need to be extended to the new electrical substation.
4. Off-Site Electrical Distribution System – The existing off-site 12,470 volt distribution system along Hina Lani Street is not adequate to serve the proposed development. Off-site 12,470 volt distribution lines and easements from the new substation to the on-site development are required to serve the anticipated load.
5. On-Site Electrical Distribution System – On-site distribution line extensions and easements are required on the developer's property to serve the anticipated load.

Wilson Okamoto Corporation
Page 2
October 1, 2010

After the development's detailed loading and civil plans are submitted, HELCO will prepare a firm cost to provide electrical power to this development. HELCO recommends energy efficient and conservation measures to reduce the maximum electrical demand and energy consumption. The developer may call HELCO's Energy Services department at (808) 935-1171 for questions or details on available programs.

It is encouraged that the developer's electrical consultant open a service request with HELCO Engineering department as soon as practicable to ensure timely electrical facility installation. If you have any questions, please contact myself or Shelley Doctor at (808) 327-0504.

Sincerely,

Thomas W. Cummins
Thomas W. Cummins, L.P.L.S.
Manager, Engineering Department
Hawaii Electric Light Co., Inc.

TWC:HKK:sm

Enclosures

cc: S. Tomita
K. Whitener
L. Rogers



2. PROJECT DESCRIPTION

2.1 Project Description

SCD - TSA Kaloko Makai, LLC proposes to develop Kaloko Makai, a residential mixed-use development, on approximately 1,142 acres of undeveloped land in Kaloko and Kohanaiki, North Kona, and Hawaii. Kaloko Makai will be a totally master planned residential community, with supporting commercial, light-industrial, educational, recreational, open space uses and their related infrastructure. This diverse project will entail construction of up to 5,000 new single- and multi-family residential units at low- and medium-densities, centralized commercial and neighborhood retail centers, an array of recreational facilities (e.g. parks, trails, open spaces), urgent care medical facility, a new elementary school, a middle school, and associated infrastructure (e.g., new roadways, utilities, drainage, wastewater and potable and non-potable water distribution systems). The community development will satisfy a wide range of primary market housing needs, including the provision of affordable housing as required by the County of Hawaii. Figure 2-1 illustrates the proposed Conceptual Land Use Plan. See Table 2-1 below for proposed land use categories and acreages.

Table 2-1
Estimated Allocation by Land Use Type

Land Use Type	Estimated Area (Acres)
Urban Center (T5, high density)	229
General Urban (T4, med. density)	193
Sub-Urban (T3, low density)	106
Dryland Forest	150
Schools	34
Hospital/Medical Center	20
Open Space/Civic Space	103
Wastewater Treatment Plan	24
Light Industrial/Commercial/Retail	153
Roadways/Utilities	130
Total	1,142

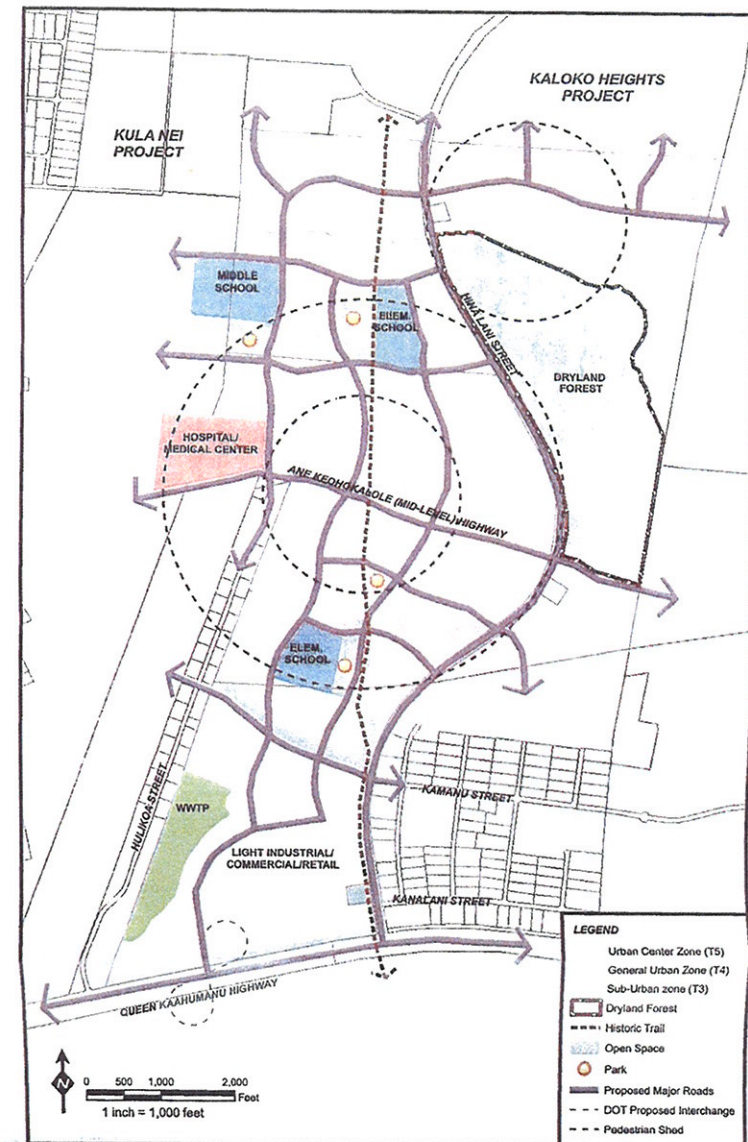


FIGURE 2-1
Conceptual Land Use Map
Kaloko Makai

7469-01
July 25, 2011



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Thomas W. Cummins, L.P.L.S., Manager
Engineering Department
Hawaii Electric Light Company
P.O. Box 1027
Hilo, Hawaii 96721-1027

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Nagata:

Thank you for your letter dated October 1, 2010. We appreciate HELCO's intent to provide electrical service for the proposed development and acknowledge that a detailed analysis will be performed by HELCO as the developer submits design drawings. The information you provided on HELCO's existing capacity and system is valuable and will be used in the planning and design of electrical service for the proposed project.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

September 19, 2010

Mr. Earl Matsukawa, AICP
Project Manager

Dear Mr. Matsukawa,

On behalf of the Kona Hawaiian Civic Club, I have received your EISP for the proposed Kaloko Makai project. I will review it with the members of our club. Therefore there will be a comment forthcoming.
Any further business matters should be addressed to

Cynthia Nazara, Pelekikena
Kona Hawaiian Civic Club
P.O. Box 4098
Kailua-Kona, HI. 96745

Mahalo

Cynthia Nazara, Pelekikena
Kona Hawaiian Civic Club

RECEIVED
SEP 21 2010
WILSON OKAMOTO CORPORATION



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Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Ms. Cynthia Nazara, Pelekikena
Kona Hawaiian Civic Club
P.O. Box 4098
Kailua-Kona, HI 96745

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISP)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Ms. Nazara:

Thank you for your letter dated September 19, 2010. We look forward to receiving additional comments from the Kona Hawaiian Civic Club. The forthcoming Draft EIS will be sent to you for review and comment.

We appreciate your participation in the environmental review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

William P. Kenoi
Mayor

William T. Takaba
Managing Director



County of Hawai'i
DEPARTMENT OF PUBLIC WORKS

Aupuni Center
101 Pauahi Street, Suite 7 · Hilo, Hawai'i 96720-4224
(808) 961-8321 · Fax (808) 961-8630
www.co.hawaii.hi.us

Warren H. W. Lee
Director

Brandon A. K. Gonzalez
Deputy Director

EM



1907 South Beretania Street
Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

7469-01
July 25, 2011

Mr. Warren H.W. Lee, P.E., Director
Department of Public Works
County of Hawaii
101 Pauahi Street, Suite 7
Hilo, HI 96720-4224

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Lee:

Thank you for your letter dated January 5, 2011 (2010-TA-0513). We offer the following responses in the respective order of your comments:

1. Kaloko Makai met with Mr. Ron Thiel and Mr. Kiran Emler to discuss proposed project, including the Kamanu Street Extension. Based on that consultation, adjustments were made on the Kaloko Makai land plan. Mr. Thiel and Mr. Emler's assistance on this matter is greatly appreciated.

We acknowledge that the major roadway alignments shown on both the Kona Community Development Plan (CDP) and the Kaloko Makai land plan are presently conceptual and that further engineering and traffic analysis will be required to establish their final alignments.

2. We acknowledge that full movement intersections on collector streets and arterials should be spaced to provide for proper signal timing. Roadways will be designed to meet Hawaii County Code and Kona Community Development (CDP) Connectivity Standards (Policy TRAN-2.1). Alternative intersection configurations, such as roundabouts, will be considered during subsequent engineering and traffic analysis and design in consultation with your agency.
3. We acknowledge that Ane Keohokalole Highway is classified and designed as a major collector road by Federal Highway Administration and State of Hawaii Department of Transportation.
4. We acknowledge Ane Keohokalole Highway is classified as an arterial and Hina Lani Street and Kamanu Streets are classified as collectors according to the County General Plan and Kona CDP. As a result of consultation with Mr. Thiel and Mr. Emler, the proposed intersection spacing was revised in the land plan to be included in the forthcoming Draft EIS.

January 5, 2011

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street
Honolulu, HI 96826



Subject: Environmental Assessment (EA) Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, N. Kona, HI
TMK: (3) 7-3-009:017, 025, 026 and 028

We reviewed the subject EISPN dated September 2010 and have the following comments. With regard to connectivity and continuity, the General Plan (GP) and Kona Community Development Plan (KCDP) concept maps shall be implemented when practicable. However, there is a concern regarding the extension of Kamanu Street directly through Hina Lani at the existing location because of the grade. We request an engineering study be done to examine alternatives. The study should examine the alternatives on the basis of traffic safety, traffic flow efficiency and accommodation of all modes of transportation.

Full movement intersections on collector streets and arterials should be spaced to provide for proper signal timing. For collectors, minimum spacing should be ¼ mile and for arterials minimum spacing should be ½ mile. Roundabouts can provide more flexibility.

Ane Keohokalole Highway is classified and designed as a major collector road by the Federal Highway Administration and State of Hawaii Department of Transportation. Ane Keohokalole Highway is classified an arterial and Hina Lani Street and Kamanu Streets are classified as collectors on the County's GP and KCDP. The proposed intersection spacing shown on Figure 2.1 does not appear to meet the guidelines stated above.

If you have any questions, Please feel free to contact Kiran Emler of our Kona office at 327-3530.

Warren H.W. Lee, P.E.
Director

cc: Planning Director
Engineering, Hilo/Kona

County of Hawai'i is an Equal Opportunity Provider and Employer.



7469-01

Letter to Mr. Warren H.W. Lee, P.E.

Page 2

July 25, 2011

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Earl Matsukawa', written over a horizontal line.

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801

CHIYOME LEINAALA FUKINO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
EMD / WB

LUD-3 7 3 009 017 etc-ID#509
EA EISPN Kaloko Makai

November 4, 2010

EM
TF



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Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street
Artesian Plaza Suite 400
Honolulu, Hawaii 96826

RECEIVED
NOV 05 2010
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: Environmental Assessment / Environmental Impact Statement Preparation Notice
Kaloko Makai, Kaloko and Kaohanaiki, North Kona, Hawaii
TMK (3) 7-3-009: 017, 025, 026 and 028 1,142 acre master planned community

Thank you for allowing us the opportunity to review the subject project which proposes to develop Kaloko Makai, an approximately 1,142 acre master planned community in Kaloko and Kohaniki, North Kona, Hawaii. The subject project is located in the non-critical wastewater disposal area as determined by the Hawaii County Wastewater Advisory Committee.

The subject document stated that, "A PER will be prepared for the Draft EIS to determine the projected wastewater flow and explore associated facility requirements for the proposed project. It is anticipated that the project will likely construct a wastewater treatment plant." Please be informed that a wastewater treatment plant will be required to be constructed for this project in accordance with Hawaii Administrative Rules (HAR), Chapter 11-62 "Wastewater Systems."

We further encourage the developer to utilize recycled water for irrigation and other non-potable water purposes such as dust control, parks, golf courses, open spaces or landscaping areas. Further, any means to reduce green house gas emissions, practice renewable energy and a reduction in waste is highly recommended.

All wastewater plans must conform to applicable provisions of the Department of Health's HAR, Chapter 11-62 "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please contact the Planning & Design Section of the Wastewater Branch at 586-4294.

Sincerely,

MARSHALL LUM, P.E., ACTING CHIEF
Wastewater Branch

LM:lmj

c: DOH's Environmental Planning Office (EPO I-3345)
DOH-WWB's Kona Staff - Mr. Dane Hiromasa
SCD-TSA Kaloko Makai LLC

7469-01
July 25, 2011

Ms. Sina Pruder, P.E., Acting Chief
Wastewater Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Ms. Pruder:

Thank you for your letter dates November 4, 2010 (EMD/WB LUD-3 7 3 009 017 etc-ID#509 EA EISPN Kaloko Makai). We offer the following responses in the respective order of your comments:

1. We appreciate your confirmation that the proposed project is located in the non-critical wastewater disposal area as determined by the Hawaii County Wastewater Advisory Committee.
2. We acknowledge that the proposed wastewater treatment plant will be required to be constructed in accordance with Hawaii Administrative Rules (HAR), Chapter 11-62 "Wastewater Systems."
3. The proposed wastewater treatment plant will produce reclaimed (R-1) quality water for general irrigation within Kaloko Makai, thus lessening the demand for potable water. Kaloko Makai will also implement feasible measures to promote energy conservation and environmental stewardship, such as the standards and guidelines promulgated by the US Green Building Council, US EPA Energy Star Program, and other similar programs.
4. We acknowledge that wastewater plans must conform to applicable provisions of the Department of Health's HAR, Chapter 11-62 "Wastewater Systems." We further acknowledge that you reserve the right to review detailed wastewater plans for conformance to applicable rules.



7469-01

Letter to Ms. Sina Pruder, P.E.

Page 2

July 25, 2011

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa", written over a horizontal line.

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

October 26, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: SCD-TSA Kaloko Makai, LLC
Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)

The State Department of Transportation (DOT) previously commented on the subject case during the EISPN period in its letters STP 8.2966 dated August 12, 2008 and STP 8.2944 dated July 24, 2008 (attached).

The DOT Highways Division Planning Branch is still reviewing the subject project. Until this review is completed, DOT's prior comments remain valid.

DOT appreciates the opportunity to provide comments. If there are any other questions, including the need to meet with DOT Highways Division staff, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at 831-7976.

Very truly yours,

Francis Paul Keeno

MICHAEL D. FORMBY
Interim Director of Transportation

Attachments: STP ltr 8.2966 dtd 8/12/08
STP ltr 8.2944 dtd 7/24/08

c: Abbey Seth Mayer, Department of Business, Economic Development and Tourism --
Office of Planning

MICHAEL D. FORMBY
INTERIM DIRECTOR

Deputy Directors
FRANCIS PAUL KEENO
JIRO A. SUMADA

IN REPLY REFER TO

STP 8.0269

EM

NOV 03 2010

WILSON OKAMOTO CORPORATION

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

July 24, 2008

TO: MR. ABBEY MAYER, DIRECTOR
OFFICE OF PLANNING
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND
TOURISM

FROM: *Francis Paul Keeno*
BRENNON T. MORIOKA
DIRECTOR OF TRANSPORTATION

SUBJECT: SCD KALOKO MAKAI, LLC
KALOKO MAKAI
ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISPN)

Thank you for requesting the Department of Transportation's (DOT) review of the subject development project as presented in the EISPN. The DOT submits the following initial comments:

1. The proposed 1,142-acre master-planned community, consisting of 5,000 residential units, retail and commercial uses, schools, parks, open space network, and supporting infrastructure will significantly impact two DOT highway facilities - Queen Kaahumanu Highway and Mamalahoa Highway.
2. The DOT understands that a Traffic Impact Analysis Report (TIAR) that analyzes traffic impacts on the roadway system within the project vicinity and identifies appropriate mitigation measures will be prepared for DOT review and approval. The DOT Highways Division is particularly interested in the project's cumulative traffic impacts and mitigation measures at and near the highway access points.
3. The DOT Highways Division is currently in discussions with various developments in the area regarding the construction of a full intersection at Queen Kaahumanu Highway and Hulikoa Drive. These discussions include the provisions necessary to preserve Queen Kaahumanu Highway as a high-speed, limited access route, with possible grade-separated connections. The subject project's development plan and TIAR should address these considerations.

file

BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
FRANCIS PAUL KEENO
BRIAN H. SERIGUCHI

IN REPLY REFER TO:
DIR 0954 & 1027
STP 8.2944

Mr. Abbey Mayer
Page 2
July 24, 2008

STP 8.2944

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

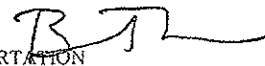
BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
FRANCIS PAUL KEENO
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:
DIR 0954 & 1027
STP 8.2966

August 12, 2008

TO: MR. ABBEY MAYER, DIRECTOR
OFFICE OF PLANNING
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND
TOURISM

FROM: BRENNON T. MORIOKA 
DIRECTOR OF TRANSPORTATION

SUBJECT: SCD KALOKO MAKAI, LLC
KALOKO MAKAI
ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
(EISPN)

The following comments are provided by the Department of Transportation (DOT) Highways Division to supplement DOT's letter, STP 8.2944, dated July 24, 2008, on the proposed subject development project:

1. DOT opposes the change in land use designation from Conservation to Urban on the portion of the site adjoining Queen Kaahumanu Highway that is proposed for commercial development. Based on DOT's long-range regional transportation requirements and preliminary engineering plans, a grade-separated interchange is proposed for the area between Hina Lani Street and Huliko'a Drive. DOT thus seeks the dedication of Right-of-Way (RoW) in this area for the grade-separated interchange as a condition of land use approval for the remainder of the proposed project area.

It is DOT's policy to preserve the Queen Kaahumanu Highway corridor as a future, high-speed, access-controlled facility. This will allow the DOT to meet its long-term requirements for regional movement of people and goods. Access onto Queen Kaahumanu Highway would only be allowed through grade-separated interchanges. Direct access onto Queen Kaahumanu Highway from adjoining properties would be restricted.

The petitioner for the proposed subject development should contact the DOT Highways Division, Planning Branch, regarding the specific location and dimensions of the RoW for the proposed grade-separated interchange.

4. Drainage flows and systems in or within close proximity of DOT properties require DOT's prior review and approval.
5. Assumptions on timetables for State highway projects should be updated. Section 3.17.4, Roadways System and Traffic states, "...Phase I of the Queen Kaahumanu Highway Expansion is anticipated to be completed by May 2008." The EISPN also states, "...Phase II of the Queen Kaahumanu Highway Expansion is proposed to be completed before the end of 2007." According to the DOT Highways Division, Phase I is scheduled for completion by December 2008 and Phase II is expected to be completed in 2011.
6. The Draft EIS should discuss the project relative to past, current and future land development projects and growth in the area.
7. The petitioner/applicant should consult with the DOT Highways Division Planning Branch regarding the above concerns.
8. The DOT is an interested party and requests at least four (4) copies of the forthcoming Draft EIS. The DOT defers further comment on the subject project, until its review of the Draft EIS.

The DOT appreciates the opportunity to provide its comments.

ET:km

c: Christopher Yuen, Hawaii Department of Planning
Mr. Alan Suwa, Wilson Okamoto Corporation

bc: HWY, -H, -P, -T
STP(ET)

Mr. Abbey Mayer
Page 2
August 12, 2008

STP 8.2966

2. The layout of the proposed subject development should be modified and based on the long-range plans for an access-controlled highway that includes a grade-separated interchange between Hina Lani Street and Huliko'a Drive. The TIAR for the proposed development, however, must also address the interim highway conditions that include an at-grade intersection at Hina Lani Street. It must also be noted that the Queen Kaahumanu Highway-Phase II project is currently proceeding through its procurement phase. This Design-Build project will widen Queen Kaahumanu Highway to a four-lane divided roadway between Kealakehe Parkway and the Keahole Airport Access Road, and includes improvements at the Hina Lani Street/Queen Kaahumanu Highway intersection.
3. Traffic generated by the proposed subject development is anticipated to significantly impact the Queen Kaahumanu Highway/Hina Lani Street intersection as well as the Hina Lani Street/Mamalahoa Highway/Palani Road intersection. The petitioner must properly mitigate all anticipated project-generated impacts and properly coordinate the timely implementation of these mitigation measures with the DOT Highways Division. The petitioner should also be required to pay for a fair share of the regional transportation improvements.
4. The proposed subject development should be consistent with the County of Hawaii's Kona Community Development Plan (CDP) that includes: a comprehensive regional transportation system of both parallel north-south roads and mauka-makai roads; a major mid-level road that would serve as a trunk transit route; connectivity between adjoining developments; and concurrency on the timing of developments to avoid overloading the regional arterial transportation system.

The DOT appreciates the opportunity to provide these supplemental comments.

ET/GS:km

c: Christopher Yuen, Hawaii Planning Department
Alan Suwa, Wilson Okamoto, Inc.

bc: HWY, -H, -P (PS 08-238), -T, STP(ET)

NEIL ABERCROMBIE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

JEFFREY CHANG
ACTING DIRECTOR

IN REPLY REFER TO

STP 8.0302

December 8, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
DEC 14 2010

WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: SCD-TSA Kaloko Makai, LLC
Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)

The State Department of Transportation (DOT) previously commented on the EA/EISPN for the subject project in its letter STP 8.0269 dated October 26, 2010, (attached) and offers the following supplemental Highways comments regarding the Traffic Impact Analysis Report (TIAR):

1. The TIAR needs to include supporting documentation regarding the assumptions used in its preparation, estimates of contributory traffic impacts from developments likely to contribute materially to background traffic increases and the basis for any "without project" roadway system improvements that are to be done by others.
2. The TIAR should address the future right-of-way requirements for a grade-separated interchange, and the provisions for a compatible roadway and connecting roadways (i.e. a frontage road) to avoid delaying this roadway upgrade.
3. The TIAR should also provide a description of the basis used in arriving at the costs applied in determining the developer's fair share contribution towards regional roadway improvements.

DOT appreciates the opportunity to provide supplemental comments on the subject project. When the DEIS for the project is completed, DOT requests that at least four (4) hard, paper copies of the document in addition to electronic media (i.e. CD-ROM) be provided. If there are any questions, including the need to meet with Highways Division staff, please contact

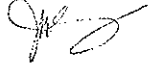
LINDA LINGLE
GOVERNOR

STP 8.0302

Mr. Earl Matsukawa
Page 2
December 8, 2010

Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

Very truly yours,



JEFFREY CHANG
Acting Director of Transportation

Attachment: Ltr STP 8.0269 dtd 10/26/10



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MICHAEL D. FORMBY
INTERIM DIRECTOR

Deputy Directors
FRANCIS PAUL KEENO
JIRO A. SUWADA

IN REPLY REFER TO:

STP 8.0269

October 26, 2010

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

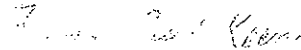
Subject: SCD-TSA Kaloko Makai, LLC
Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)

The State Department of Transportation (DOT) previously commented on the subject case during the EISPN period in its letters STP 8.2966 dated August 12, 2008 and STP 8.2944 dated July 24, 2008 (attached).

The DOT Highways Division Planning Branch is still reviewing the subject project. Until this review is completed, DOT's prior comments remain valid.

DOT appreciates the opportunity to provide comments. If there are any other questions, including the need to meet with DOT Highways Division staff, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at 831-7976.

Very truly yours,



MICHAEL D. FORMBY
Interim Director of Transportation

Attachments: STP ltr 8.2966 dtd 8/12/08
STP ltr 8.2944 dtd 7/24/08

c: Abbey Seth Mayer, Department of Business, Economic Development and Tourism --
Office of Planning

7469-01
July 25, 2011



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Artesian Plaza, Suite 400
Honolulu, Hawaii, 96826 USA
Phone: 808-946-2277
FAX: 808-946-2253
www.wilsonokamoto.com

Mr. Glenn Okimoto, Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, HI 96813-5097

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Okimoto:

Thank you for your letters dated October 26, 2010 (STP 8.0269) and December 8, 2010 (STP 8.0302). Your October 26, 2010 letter also states that comments offered in your letter dated July 24, 2008 on the previous EISPN published for the project remain valid. We offer the following responses in the respective order of your comment letters.

July 24, 2008 (DIR 0954 & 1027, STP 8.2944)

1. We acknowledge that the proposed project may significantly impact DOT Highway Facilities – Queen Kaahumanu Highway and Mamalahoa Highway. The Draft EIS will include a Traffic Impact Assessment Report (TIAR) that will address access and traffic issues, as well as recommend mitigation measures to address potential adverse impacts.
2. As mentioned above, the Draft EIS will include a TIAR, which will also address cumulative impacts.
3. Intersection improvements at Hulikoa and Queen Kaahumanu Highway have been implemented. We acknowledge DOT's policy to preserve Queen Kaahumanu corridor as a future, high-speed, access-controlled facility. The proposed project is not proposing direct access to Queen Kaahumanu.
4. We acknowledge that any modification of drainage systems in or within close proximity to DOT properties require your review and approval.
5. Notably, we understand that Phase 1 of the Queen Kaahumanu Highway has been completed and Phase 2 from Kealahou Parkway to Keahole Airport Access Road is underway. The updated information on DOT project schedule is appreciated. We will incorporate this information, as well as any subsequent updates in our TIAR and Draft EIS.

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6. The Draft EIS will discuss current and future land development projects in the vicinity of the project site.
7. Kaloko Makai will consult with DOT Highways Division, Planning Branch regarding the preceding information.
8. We will provide four copies of the forthcoming Draft EIS to DOT.

August 12, 2008 Letter (DIR 0954 & 1027, STP 8.2966)

1. We understand that the State of Hawaii Department of Transportation's (DOT) opposition to the change in land use designation from Conservation to Urban on the portion of the site adjoining Queen Kaahumanu Highway. Use of this area for an interchange, however, is more consistent with Urban designation than Conservation. We acknowledge DOT's long-range transportation plan for a proposed grade-separated interchange at this location. Any proposed interior use of this area by Kaloko Makai, such as for light-industrial and mixed-use would be subject to removal when DOT is ready to construct the interchange.
2. The land plan in the forthcoming Draft EIS will indicate the location of DOT's planned interchange. The TIAR will consider the current at-grade conditions, as well as plans for intersection improvements at the Hina Lani Street intersection associated with the on-going Queen Kaahumanu Highway Widening Project.
3. The TIAR will recommend mitigation measures to address traffic impacts associated with Kaloko Makai. These mitigation measures and Kaloko Makai's fair share cost responsibilities will be the subject of future consultation with DOT, Highways Division, Planning Branch.
4. The project will be consistent with the County's Kona Community Development Plan, including provision for transportation improvements and concurrency, as will be discussed in the forthcoming Draft EIS.

December 8, 2010 (STP 8.0302)

1. The TIAR will include supporting documentation regarding the assumptions used in preparing estimates of contributory traffic impacts from developments likely to contribute materially to background traffic increases and the basis for any "without project" roadway system improvements that are to be done by others.
2. As discussed above, in recognition of DOT's planned grade-separated interchange planned for the area, the proposed light-industrial and mixed-use is subject to removal when DOT is ready to construct the interchange.



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3. Kaloko Makai acknowledges that the project would be required to contribute a fair share portion of the cost for constructing transportation improvements, however, it is premature to speculate on what the contribution should be at this conceptual planning stage.
9. We will provide four copies and a CD with pdf file of the forthcoming Draft EIS to DOT.

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa", written over a horizontal line.

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



CHRYONE L. FUKINO, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
File



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October 25, 2010

TO: Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation

FROM: Russell S. Takata, Program Manager
Indoor and Radiological Health Branch

SUBJECT: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026 & 028

Our comments should be printed as follows:

"Project activities shall comply with the Administrative Rules of the Department of Health:

- Chapter 11-46 Community Noise Control.

Should there be any questions, please contact me at 586-4701.

7469-01
July 25, 2011

Mr. Russell Takata, Program Manager
Indoor and Radiological Health Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, HI 96801-3378

Subject: Environmental Assessment (EA)/Environmental Impact Statement
Preparation Notice (EISPN)
Kaloko Makai
Kaloko and Kohanaiki, North Kona, Hawaii
Tax Map Key: (3) 7-3-09: 017, 025, 026, and 028

Dear Mr. Takata:

Thank you for your letter dated October 25, 2010. The proposed project will comply with Hawaii Administrative Rules (HAR), Chapter 11-46 "Community Noise Control." The Draft EIS will also include a Noise Study that will address potential short-term and long-term noise impacts generated by the project.

We appreciate your participation in the environmental review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl Matsukawa".

Earl Matsukawa, AICP
Project Manager

cc: Mr. Peter Phillips, Stanford Carr Development
Mr. Orlando Dan Davidson, State Land Use Commission

