



OFFICE OF PLANNING STATE OF HAWAII

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
ACTING DIRECTOR
OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

Ref. No. P-14777

June 15, 2015

Mr. Peter T. Young, President
Hookuleana, LLC
1539 Kanapuu Drive
Kailua, Hawaii 96734

Dear Mr. Young:

Subject: HoKua Place
HG Kauai Joint Venture
Draft Environmental Impact Statement
TMK: (4) 4-3-003: por. 001
Kawaihau District, Wailua, Kauai, Hawaii

2015 JUN 17 A 7:05
LAND USE COMMISSION
STATE OF HAWAII

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS). The 97-acre project is proposed for approximately 683 multi-family and 86 single family units including parks, and 1.4 acres of commercial use. The document also indicates that the adjacent HoKua farm lots share some of the project infrastructure.

The Office of Planning (OP) has the following comments:

1. The resolution and clarity of some of the maps were poor.
2. Archaeological Resources, Appendix L. We could not locate any letters or comments from the State Department of Land and Natural Resources, State Historic Preservation Office commenting on the adequacy of this study. These should be provided if available.
3. Agricultural Resources, Exhibit C. Information is included on the designations for the Land Study Bureau, but we could not locate any information on ALISH designations. If the document does not include this information, then the DEIS should include additional information on agricultural resources. The soils and LSB maps included should be clarified, as these were of poor resolution and clarity.
4. The entire site is within the State Agricultural District. The proposal will require that the Property be reclassified to the State Urban District by the Land Use Commission (LUC). OP represents the State as a mandatory party in proceedings before the LUC. In developing its position, OP evaluates whether the project meets the LUC decision-making criteria in

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HRS § 205-17, as well as its conformance with Coastal Zone Management objectives and policies in HRS § 205-A-2.

5. Invertebrate Survey. In a letter dated January 29, 2015, for the Environmental Impact Statement Preparation Notice (EISPN), OP commented that the DEIS should include an invertebrate survey. In Exhibit K, Biological Surveys Conducted on the Kapaa Highlands Phase II Project Site, TMK: (4) 3-003: 001, Island of Kauai, Hawaii, an invertebrate survey was not included within the document.

Thank you for the opportunity to review this project. If you have any questions please call either Josh Hekeia of our Coastal Zone Management Program at (808) 587-2845 or Lorene Maki of our Land Use Division at (808) 587-2888.

Sincerely,



Leo R. Asuncion
Acting Director

✓ c: Land Use Commission