

HoKua Place - Draft EIS - Comments from W-KNA RAYNEREGUSH

to:

luc, info, gallen 06/22/2015 10:47 PM

Hide Details

From: RAYNEREGUSH@aol.com

To: luc@dbedt.hawaii.gov, info@hookuleana.com, gallen@harbormall.net

I Attachment



HoKuaPlace-WKNA Comments-DEIS-JUNE2015.pdf

Aloha,

Attached please find comments from the Wailua-Kapaa Neighborhood Association regarding the Draft EIS for HoKua Place (Petition for a Boundary Amendment).

Mahalo, Rayne Regush W-KNA Chair 651-1318 c.



June 22, 2015

Daniel E. Orodenker State Land Use Commission P. O. Box 2359 Honolulu, HI 96804-2359 luc@dbedt.hawaii.gov Peter T. Young Ho'okuleana LLC 1539 Kanapu'u Drive Kailua, HI 96734 info@hookuleana.com Greg Allen, Jr. HG Kaua'i Joint Venture 161 Wailua Road Kapa'a, HI 96746 gallen@harbormall.net

RE: Draft EIS for HoKua Place, Kapa'a - Petition for District Boundary Amendment for 97-acres from Agriculture District to Urban District, TMK (4)4-3-03:001

The Wailua-Kapa'a Neighborhood Association (W-KNA) cannot support this Boundary Amendment at this time. It is imperative that roadway infrastructure improvements are implemented first and foremost to resolve long-standing traffic congestion in Kapa'a. Development and population growth has outpaced the town's roadway infrastructure and HoKua Place (even if phased) may intensify this problem.

Members of the W-KNA board have recently served on the State Department of Transportation's Citizen Advisory Committee for the Kapa'a Transportation Solutions Study. We understand the urgency to address traffic needs before increasing residential density in Kapa'a. Yet, we understand the acute need for affordable housing and support siting urban expansion adjacent to the Kapa'a town core. But, allowing more density now is a risk to the community until roadway solutions are implemented.

Within the role of the Land Use Commission (LUC), can specific conditions be imposed on the applicant to mitigate critical transportation concerns? For example, could an agreement be negotiated to grant the Boundary Amendment once HoKua Place "Road A" is operational for public use? This way, a transportation solution is guaranteed in advance of any housing construction.

The petition for the boundary amendment for Urban District entitlements should not be granted until:

- 1. One or more traffic congestion mitigation solutions are in the construction phase, and
- 2. The project's financial plan is vigorously assessed by the LUC to indicate that funds are sufficient to execute the 97-acre Phase II development. Otherwise, the project may be speculative in nature, seeking entitlements that will increase the property's market value.

Traffic Circulation and Congestion.

HoKua Place represents a dramatic increase in housing for East Kaua'i and once occupied, it will contribute significantly to regional traffic. Utilization of multi-modal design will not alleviate existing congestion problems.

The 1997 Kaua'i Long-Range Land Transportation Implementation Plan has not met its 2000 and 2006 deadlines for Kapa'a roadway widening in areas affected by the proposed boundary change. And, recommendations in the 2035 Transportation Plan for the Kauai District (July 2014) have not been implemented. Recommendations in the Kapa'a Transportation Solutions Study (2015) have not yet been published, but will include some priority projects which could be completed in five years.

Serving Residents of the Kawaihau District "We treasure our rural community"

- a) What is the status of the Draft TIAR dated June 6, 2014?
- b) What are the specific times described as "peak hours" in the TIAR? Please include a description of weekend traffic congestion in the DEIS.
- c) Discuss how the Applicant might partner with the county to design and construct a roundabout or a 4-way intersection alternative where Olohena, Ka`apuni, Keahulua Roads and HoKua Place "Road A" meet. What partnership terms might the Applicant agree to as a condition for granting the Boundary Amendment?
- d) Provide a topographical rending of the proposed Overpass that will cross the Bypass Road.
- e) We concur with the County's recommendation for a left turn storage lane from the Kapaa Bypass (northbound) into "Road A" and a southbound right turn lane into "Road A". Please provide an overlay illustration of how the Bypass Road will accommodate these turn lanes and explain whether or not the Applicant will agree to not deferring these improvements.
- f) We agree with the County's recommendation that the TIAR analyze: a) the intersection of Kuhio Highway and Lehua Street, and b) Olohena Road and Lehua Street.
- g) The DEIS should describe the anticipated traffic impacts at the Kapa'a Roundabout, but <u>not</u> in the context of Bypass Road closure.

Density.

- a) The proposed 769 housing units on 97-acres is high density for a rural island. Why didn't the EISPN provide alternatives for reduced residential density by decreasing the 683 multi-family units? Please provide alternate scenarios.
- b) Alternative 3 Residential Lot Subdivision (page 23) does not disclose the number of single family housing lots proposed. Please provide that number and describe how it will "pencil out".
- c) Why are there no Kaua'i Housing Code designated affordable single family homes and instead, only affordable multi-family housing?
- d) Siting multi-family, multi-story housing along sloped topography involves additional cost and other challenges. Please provide more narrative about this and a visual aid showing the multi-story designs built on the hillside.

Phasing.

a) Explain the relationship between Phase I-HoKua Farm Lots and Phase II-Hokua Place describing in detail any constraints (especially financial) that one may have upon the other.

DEIS Maps.

- a) The EISPN Concept Plan Map October 2010 (which gave a good visual representation of the placement of all the housing units, greenbelts and roads) was replaced by Conceptual Plan Map March 2015 that has far less detail (see pages 13, 20 and 161). What do the unlabeled blue boundary lines represent? Why are they drawn through several proposed houses?
- b) Providing a full page, color configuration of the proposed 769 housing unit buildout similar to the Concept Plan Map October 2010, would be very helpful.
- c) A full page topographic map should be included with legible elevation lines, streams, ditches, diversions, wells, bridges and other pertinent notations including boundaries of adjacent landowners with TMK numbers.
- d) Provide a site map showing existing cane haul roadways (paved and unpaved) and the proposed roadways sited throughout the development.
- e) A current FIRM Map needs to replace the FIRM Map Overlay dated 2005 (page 146).

Stream Impacts.

a) Provide confirmation whether or not the "unnamed" Stream referenced in the DEIS (eg. Water Resources, page 77, Section 4.6.1) is actually Waikaea Stream which crosses Olohena Road and the Bypass Road from Hokua Place and empties into the Waikaea Canal. The Google Earth picture we inserted here identifies Waikaea Stream with a blue line.



- b) On page 77, the DEIS says: "HoKua Place is committed to keeping the flow of the stream consistent". Therefore, please include base flow information for this stream.
- c) Provide the distance between the location of the Potable Well and the Stream, and to the Spring identified on page 86 on the map.

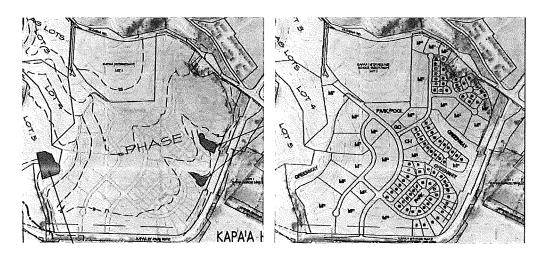
Inconsistent Information.

- a) Many documents in the DEIS were prepared years earlier for Kapa'a Highlands. Please describe each instance where the information may not apply to HoKua Place.
- b) HoKua Place is a hillside development so we question why there are so few references to this fact. The aerial photos also appear to flatten out the terrain.
- c) On Page 19: Natural & Cultural Resources, it notes: "Should any archaeologically **significant** artifacts, bones, or other indicators be uncovered during construction...". Since a cultural site monitor is not proposed, who is qualified to determine whether finds are "significant"?
- d) Page 19: Land Use. To our knowledge, there is no county document called the "Kapa'a-Wailua Basin Community Plan". However, there is a 1973 Kapa'a Wailua Development Plan. It has not been updated. So, saying the project is consistent with that Plan, evades that fact that a 4-decade old plan is not optimal.

Drainage.

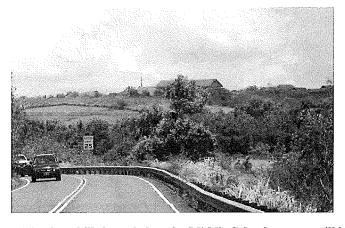
- a) The Preliminary Engineering Report on Drainage Improvements (Exhibit F) is extremely brief. As stated: "the topography varies from gently sloping, bluff top property, to steep areas that drop off into drainage gullies" therefore a more detailed analysis on the impacts of storm water runoff and maintaining pre-development drainage flow volumes and patterns is warranted.
- b) The drainage system refers to three detention basins which are also labelled as "Greenways" on the maps. Please provide photographs of these areas and also a visual rendering of how these dual-purposed gullies will be used.

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Visual and Aesthetic Resources.

- a) Significant views of Nounou Mountain Range and Mount Waialeale can be seen from the Middle School property. Discussion has been omitted concerning how the development will impact the line of sight to this spectacular scenery.
- b) The surrounding landscape offers sweeping vistas looking makai to the ocean and mauka towards the mountains. The development needs to provide scenic overlooks and vista points for public benefit. The 3-acre park may not offer sufficient views of these dramatic panoramas.
- c) The "Photo Tour" in section 4.4.1 Environmental Setting (pages 63-69) minimizes the project's visual impacts from different public vantage points along the Bypass and from Olohena Road.
- d) The two photos below are far more representative of the views "approaching HoKua Place, driving North on the Bypass Road" than Photo Tour picture #1 (page 64) in the DEIS.





The downhill slopes below the Middle School campus will be populated with new urban district housing, replacing the existing agricultural vistas.

e) From Olohena Road near the fork at Ka'apuni, views such as the panoramic photo below, is far more representative than DEIS photos #15 and #16 (pages 68-69).

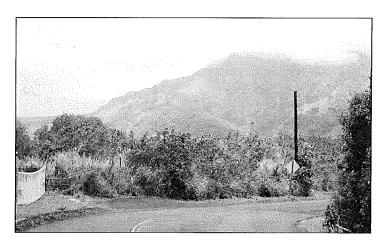
Page 5 W-KNA Comments on the HoKua Place Draft EIS June 22, 2015





Panorama of the HoKua Place development site looking southeast with expansive ocean views and in the far distance is Hoary Head/Haupu Mountain Range in Lihu'e.

f) DEIS photo #13 (page 68) is a poor representation of "Looking across the west side of the Middle School parking lot, Hokua Place is beyond." In contrast, our photo below shows the school parking lot fence (lower left corner) and the dirt road (proposed "Road A") where it meets Olohena Road, traveling mauka just before the fork. Makaleha Mountain Range and the "lei of pearls" (waterfalls) are visible.



- g) There are also spectacular views of Mount Waialeale on days without a cloud cover. Scenic and open space resources are important assets to the community.
- h) To preserve views, we strongly encourage the developer to commit to undergrounding electric lines, which currently, they state is "dependent on funding".

Secondary and Cummulative Impacts.

- a) The DEIS fails to note that the County's General Plan 2000 is outdated and that many of the recommended implementing actions did not occur. A General Plan update has just launched, therefore the first paragraph on page 153 is inaccurate.
- b) Secondary impacts relate principally to overburdened roadway infrastructure and public facilities and services which don't meet demand. Please describe the extent to which increased tax revenues from new housing will offset and exceed the demand for additional police and fire protection and new roadway improvements.

- c) Cumulative impacts relate to HoKua Place in the context of two large resort developments approved just a few miles away Coconut Beach Resort (343 units) and Coconut Plantation Village (198 units) along with pending permit approvals for the Coco Palms Resort's 350-unit hotel. Please discuss the social impacts or diminished quality of life from the anticipated population growth from these resorts.
- d) The information provided from the DOE's Classroom Utilization Report 2007-2008 and the School Status and Improvement Reports for School Year 2010-2011 (pages 112-113) would be more meaningful if you provide charts showing multiple years, and include more current data.

DEIS Volume II.

- a) Volume II is almost 400 pages in length and should have been paginated. It is extremely challenging to navigate the Appendices.
- b) W-KNA did not receive the consultant's undated letter acknowledging our EISPN comments, but we did see it reproduced near the end of Volume II.

Thank you for the opportunity to comment. We look forward to a detailed response from the consultant, Ho'okuleana LLC and a copy of the FEIS.

Sincerely,

Rayne Regush

Chairperson, on behalf of the W-KNA Board



Welti Comments on Hokua Place Cynthia Welti

to:

info, luc

06/22/2015 10:20 PM

Cc:

Bruce Welti Hide Details

From: Cynthia Welti <cwelti@gmail.com>

To: info@hookuleana.com, luc@dbedt.hawaii.gov

Cc: Bruce Welti

Struce@welti.us> Please respond to cynthia@welti.net

Dear Mr Young,

We have read the extensive Draft Environmental Impact Statement for Hokua Place and remain opposed to this development for 2 reasons.

- 1. Traffic. Though the DEIS addresses traffic along with many subjects, the fact remains Kapaa is already overloaded with vehicular traffic and the new improvements will not do enough to alleviate what we already have. The DEIS study dates from almost 2 years ago for its Existing Conditions, and traffic has grown significantly worse since then. Indeed between the hours of 8-6 traffic comes practically to a halt in at least one direction of the highway if not both, and beyond these hours as well.
- 2. Upzone. We are opposed to upzone without significant mitigation. While there is clearly some good mitigation in the proposal, we are unable to determine if it compensated for the enormous financial benefit of changing the zoning to urban.

Despite the impressive amount of content in the document about the site and beyond, we have severe misgivings about it for multiple reasons and wish to voice our strong opposition to the development.

Sincerely,

Bruce and Cynthia Welti Kapaa



HoKua Place Objection Patricia Shields

to: Luc

06/22/2015 09:09 PM

Hide Details

From: Patricia Shields <phshields2334@gmail.com>

To: Luc@dbedt.hawaii.gov

i am a senior resident who is still enjoying my independence by driving from the Homestead into Kapaa twice each day to swim & walk along the beach. In my late eighties, this is a daily devotional I treasure. I strongly object to a zoning change to facilitate the HoKua Place project. It is irresponsible to permit building which will increase an already present traffic problem before the necessary infrastructure is in place.

Marlo for considering the views of your residents,

Pat Shields Wailua Homestead



HoKua Place, Kapaa, HI Geoffrey Shields

to: luc

06/22/2015 08:57 PM

Hide Details

From: Geoffrey Shields <gshields2334@gmail.com>

To: luc@dbedt.hawaii.gov

Attention Land Use Commission,

As a resident of Kauai, I would like to express my concern about the development of agricultural land in Kapaa for the HoKua Place housing project. We live in the Wailua Homestead community, a few miles north of the proposed development site. Access in & out of our neighborhood is limited to two roads connecting to Kuhio Hwy in Kapaa, one of which runs in front of the proposed site on Olohena Rd. Both of these roads become congested during morning & afternoon commutes, primarily because Kuhio Hwy is already overcrowded. This project would serve to exacerbate this situation. Without meaningful improvements to the Kapaa bypass in advance of any developments of this magnitude, I am confident that the driving experiences of all homeowners in the Homestead will become quite frustrating.

There appear to be alternative parcels on Kauai suitable for a housing project of this scale that are not in such a congested traffic area like Kapaa. It would also come to reason that many of the prospective owners in HoKua Place will be working couples, commuting to where the jobs are, which is not Kapaa. So much land west of Lihue offer traffic patterns able to handle responsible growth, in closer proximity to employment opportunities. There is nothing responsible about encouraging more vehicles to be domiciled in Kapaa before the roads are changed to better handle the existing traffic.

Please preserve all Agriculture dedicated land in Kapaa until which time our current traffic problems are actually fixed, not just debated.

Respectfully submitted, Geoff Shields 6290 Olohena Rd. Kapaa, HI 96746



Hokua Place Development Richard Diamond to: info, luc 06/22/2015 05:11 PM Hide Details

From: Richard Diamond kauaimuse@gmail.com>
To: info@hookuleana.com, luc@dbedt.hawaii.gov

Aloha,

Considering the increasingly burdensome traffic in the Kapaa area, the Hokua Place project will severely exascerbate our dire problems. The massive amounts of materials needed and then using them for construction here will make an unacceptably substantial contribution to global carbon dioxide pollution, not to mention erosion, increasing our already desperate climate situation.

The Hokua Project proposes 86 single-family lots and 683 multi-family units in townhouse units, or 769 family homes. It has been estimated that as much as 1,500 vehicles or more could be added to our roads in the Kapaa area, resulting in overwhelming congestion on our already taxed road system.

It is outrageous that the developer has denied the need for significant changes in road construction, saying that traffic studies done in 2012 are adequate and that 'traffic impacts due to the project are not considered important. It is obvious that the traffic impacts of 1,500 vehicles added to our roads would actually be quite significant!

Further, the developer's own Traffic Impact Assessment Report, written in 2012, as part of the Draft Environmental Impact Statement for the HoKua Place development recognized that the traffic flow through the Kapaa roundabout and the intersection of the Kapaa bypass and Kuhio Highway were already at failing grades for level-of-service or traffic flow. Little or no traffic mitigation has been done since that report was written and the traffic has grown noticeably worse over the last three years.

It is clear that the substantial potential problems of this massive development will contribute, inevitably, to the lowered quality of life on our tiny garden island.

We implore you to urge the State Land Commission to reject the DEIS.

Thank you for your attention to this, and to the numerous other letters you have received in opposition to this proposed development.

Aloha,

Richard (Diamond) Moll

P.O. Box 113

Kapaa, HI 96746



Re: DEIS Hokua Pl. pub. 5-8-15 by OECQC --- Please halt the Hokua Place development in Kapaa, Kauai M.Mulhall

to:

luc, info, mwilliams 06/22/2015 03:22 PM

Hide Details

From: "M.Mulhall" <mmulhall@hawaii.rr.com>

To: <luc@dbedt.hawaii.gov>, <info@hookuleana.com>, <mwilliams@kauai.gov>

Dear Members of the Commission:

Please halt the development of HoKua Place in Kapaa, Kauai.

It is an insane idea to add homes in that area of Kapaa, and if you had to drive through it daily as many of us do, you would understand what I mean.

1. Kapaa's traffic is legend.....in a horrifying way.

Personally, I often drive from the Wailua Homesteads down Kuamoo to the highway and then to Lihue to shop during the daylight hours rather than sit in traffic in Kapaa, wasting time and getting more and more irritated.

Five years ago, some visitors commented to me that they would never again stay in Kapaa or North of Kapaa because, they said, the "traffic is murder!" (their words.) My point: traffic is not only affecting us, the residents of Kauai.

Kapaa traffic has a negative effect on tourism as well.

2. We do not even have sidewalks most places on Kauai.

The kids have to walk or ride bikes along the roads to school.

Olohena Road, where HoKua place would be built, is so hazardous that bike riders have been sent head-over-heels into roadside ditches as people come down the hill and are unable to see people on bikes in time to stop or slow down.

Olohena is a county road, poorly engineered for today's needs. It is winding, with poor visibility along its many curves.

The increased traffic plus the increased number of children on the road is a setup for disaster.

The cost burden to the County for improvements to the roads, sewers, water supply, utilities, added to the loss of tourism due to the terrible traffic adds up to an economic disaster for Kauai.

Please, please, please....either halt or re-locate the HoKua development.

Mahalo, Mary Mulhall, Kapaa resident 1210 Crossley Rd. Kapaa, Hi. 96746

In Regards to Hokua Place being built We are strongly against it. #1. Ag land should stay Ag land. What's the Sense in having land zoning if it can be changed? #2. Our roads are already over crowded and in really bad condition. On Wednesdays at 3pm the round about area is a total Night Mare! My husband has lived on Kaapuni Rd for 45 years. It used to be a quiet road with little traffic. Now, every time we pull out of our drive way we are taking our life in our hands. What would it be like if Hokua Place was built? Probably Death at our drive way. And if not ours, probably some one elses. #3. Our Schools, Parks, Police + Fire Departments are inadequate to handle that many more people. I say enough is enough. We need to take care of what we already have, Not add more to it. Please use your common sense and do What a Planning Department should do ...

#4 Plan Sensibly.

Mahalo for taking the time to read this. Brigid + Oliver Shagnasty

5311 Kaapuni Rd, Kapaa
823-8715

Oh, I just thought of #5. Landfill. Were at

Oh, I just thought of #5. Landfill. Were at Full Capacity now. Where's all the rubbish going to go?

Comments on Hokua Place --- DEIS Ken Taylor to: luc

Cc: info

06/23/2015 11:14 AM

Comments on Hokua Place--- DEIS (4) pages attached

6/23/15 Minor Changes

On page two please find three changes, changes are in red. Paragraph Four changed east to west twice. Then in paragraph Five changed west to south.

Sorry for the inconvenience.

Ken

This email is free from viruses and malware because <u>avast! Antivirus</u> protection is active.



6/22/15

Daniel E. Orodenker Land Use Commission 235 S. Beretania St. Suite 406 Honolulu, Hawaii 96813

Daniel Orodenker and Land Use Commissioners

Re: Comments on Hokua Place
Draft Environment Impact Statement Volumes 1 & 2

NO ZONE CHANGE SHOULD BE GIVEN, UNTIL THERE IS ADEQUATE INFRASTRUCTURE IN PLACE.

Because the applicant has failed to answer most of the questions raised back in Jan.2015, this document should not be accepted. It should be returned for clearer and more precise answers to all questions.

LET'S BE CLEAR, THIS PROJECT IS NOT SUSTAINABLE.

What's the first law of sustainability? You've heard thousands of people talking endlessly about sustainability; did they ever tell you the first law? Here it is: population growth and/or growth in the rates of consumption of resources cannot be sustained.

Traffic

Traffic is the major issue, and the project should not go forward until the infrastructure is in place to take the traffic from this project and all other known projects. We can document the discussion for the construction of the Kapaa relief route between Kapule Highway and Kapaa Stream all the way back to 1973. 42 years of growth without the relief route, it's time has come.

- 1) Kapaa, Wailua Development Plan 1973 Bill# 304 (As Amended) Ordinance # 304
- 2) Kauai Long Range Land Transportation Plan 1997
- 3) Kauai General Plan (KGP) Ordinance # 753 adopting the KGP was approved by County Council on Nov. 29, 2000
- 4) Federal-Aid Highway 2035 Transportation Plan

We have received all the development from these documents, but very, very little new road capacity to deal with the increase in traffic. The many or frequent traffic jams and bump to bump traffic is not only a social impact on the community and tourism, it has a very heavy economic impact on the whole Island wide business community. Also one must consider the movement of emergence equipment during these times.

We have "DOUG OURSELF's INTO A HOLE". Please, "NO" more zone changes till we get the Kapaa relief route between Kapule Highway and Kapaa Stream in place.

The traffic studies for this project were done in 2012-2013 maybe even earlier, as we were still feeling the effects of the 2008-09 economic down turn. The economic activity since late 2014 has been picking up to a point where we may have a 12-20 % increase or more in visitors. If you have 18,000 visitor per day on Island, and you have 2.75 people per car that equals a potential of 6,500 cars on the road, at 22,000 visitors the number jumps to 8,000 cars per day.

The traffic studies also neglected to look at the traffic increases from Coco Palms Hotel, two condo projects with about 500 units total, just north of Coconut Market Place, the potential increase in traffic from the remodel of Coconut Market Please. Then west of the proposed project you have a 130 unit Ag. Subdivision, further west between Kuamoo Rd. (580) all the way over to Kawaihau, there is about 4000 buildable lots that do not need zone changes. Property owners could go in for building permits at any time.

Just to the **south** of Coco Palms Hotel along Kuhio Hwy. and across the Wailua River there is a 700 unit Hawaiian Homelands Proposed project.

And looking north we have a 3000 unit project. Because Lihue, is the center of commerce of Kauai, all the residents from this project will be traveling from time to time to Lihue.

Traffic from all projects will have substantial adverse effects on human beings now living on Kauai.

These impacts, which are cumulatively considerable, when viewed in conjunction with the effects of other past, present and probable future projects must be considered. The project's contribution must be significant, but need not itself constitute a substantial percentage of the entire cumulative impact.

The major traffic congestion comes when these projects come together at the intersections of Kukui street and Kuhio Highway and then at Kapaa Bypass and Kuhio Highway.

Project Alternatives:

The (DEIS) Must discuss both mitigation and alternatives to the proposed project. Each alt. must be described in sufficient detail to permit a clear and precise comparison with the proposed project.

The EIS should focus on alternatives, capable of "substantially lessening" adverse environmental effects. This has not been done.

Storm water/ Drainage

Because of the slopes on this site, a plan must show how the wet-lands will be protected from polluted storm water runoff. The developments hard surfaces could cover (12-15 acres) which will concentrate runoff and create a situation difficult to absorb. Before granting a zone change, require a full storm water/drain plan.

Waste Water

Today there is a question as to the capacity and plant's ability to treat the current flow let-a- loan any additional flow. There also is a law suit in place and "NO REZONE" should take place till we see the outcome of the suit. If the County looses they could be required to build a new treatment plant, which may take 3-5 years or more.

Water

The project is within Kauai County Department of Water service area and must be required to deal with the water district. They must not be able to build their own water system.

ADA

Show how all walks, paths, and streets meet ADA requirement? A map is needed showing the grades of all walks, paths and streets, as well as the

connectivity to old town. It should also show how one may get to the church across the street, swimming pool and commercial areas of the project.

Show a complete North/South circulation plan.

How does the transportation plan and its mitigation promote resiliency for the community?

Please, "NO ZONE CHANGE" till the Kapaa relief route, is in place.

luc@dbedt.hawaii.gov info@hookuleana.com

4 pages

Thank You

Ken Taylor

taylork021@hawaii.rr.com