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BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAI'I

In the Matter of the Petition of)	Docket No. A17-802
)	
COUNTY OF KAUA'I HOUSING)	PETITIONER COUNTY OF KAUA'I
AGENCY)	HOUSING AGENCY'S RESPONSE TO
)	INTERVENOR JEAN NISHIDA
To Amend the Agricultural Land Use)	SOUZA'S STATEMENT OF POSITION;
District Boundaries into the Urban Land)	CERTIFICATE OF SERVICE
Use District for certain lands situated at)	
'Ele'ele, Kaua'i, Hawai'i; consisting of)	
approximately 75 acres, Tax Map Key)	
No. (4) 2-1-001:054)	
_____)	

PETITIONER COUNTY OF KAUA'I HOUSING AGENCY'S RESPONSE TO INTERVENOR JEAN NISHIDA SOUZA'S STATEMENT OF POSITION

In response to the Statement of Position, Written Testimony, and Exhibits filed by Intervenor Jean Nishida Souza (“**Intervenor**”), Petitioner County of Kaua'i Housing Agency (“**Petitioner**”) submits this Response. This Response summarizes Petitioner’s responses to the issues raised by Intervenor and presents proposed conditions to a decision approving Petitioner’s petition for a boundary amendment.

A. Petitioner’s Responses to Intervenor’s Issues of Concern

Intervenor stipulated that her issues of concern were to center upon the following: (1) traffic impacts and mitigation measures; (2) impacts and mitigation measures affecting ‘Ele‘ele Elementary School; (3) drainage and flooding impacts and mitigation measures; (4) impacts and mitigation measures for offsite recreation facilities; (5) impacts and mitigation measures related to emergency shelters; (6) the relationship of the Lima Ola Workforce Housing Development Project (“**Lima Ola**” or “**Project**”) to development plans for adjacent properties; and (7) timely public notice and opportunities to testify and comment on the proposed Lima Ola project. See Order Accepting Oral Stipulation to Admit Jean Nishida Souza as an Intervenor in the District Boundary Amendment Proceeding. These issues of concern are addressed by the conditions and commitments discussed below.

1. Traffic Impacts and Mitigation Measures

Intervenor asserts that Petitioner’s Petition for Declaratory Order conflicts with the draft Petition for Land Use District Boundary Amendment (“**Petition**”) and Exhibits. In particular, Intervenor compares the language of the Petition for Declaratory Order, which states that the actual development timeline is subject to various factors and that Petitioner is unable to provide an incremental site plan or present a schedule for future phases of the Project, with the analysis of the Traffic Impact Analysis Report (“**TIAR**”), which is based upon specific phases and composition of housing units per phase. Intervenor’s Statement of Position, at 3-4.

Intervenor correctly notes that the TIAR was based upon a specific composition of housing units and phases of development. The proposed composition and developmental phases were the best available information that Petitioner had at the time the analysis was completed. As addressed

in the Petition for Declaratory Order, the exact timeline for development will need to remain flexible due to varying availability of federal and other funding sources.

Petitioner acknowledges that this flexibility may result in proposed compositions of housing units and phases of development that vary from the proposed project analyzed in the TIAR. Accordingly, Petitioner proposed the following condition, Proposed Condition No. 2, in its Proposed Findings of Fact, Conclusions of Law, and Decision and Order:

Petitioner shall complete an updated Traffic Impact Analysis Report [] prior to each phase of development and submit the same to the State Department of Transportation (“DOT”) for its review and approval. Petitioner shall mitigate all project-generated traffic impacts as recommended and/or required by the TIAR approved by the DOT.

Intervenor states that despite this proposed condition, “there are no commitments by the Petitioner on the timely completion of improvements and the timely monitoring and effective response to conditions as indicated in the TIAR or as may be required by [DOT].” Intervenor’s Statement of Position, at 4. Petitioner respectfully disagrees that this condition does not represent a commitment by Petitioner. According to this proposed condition, Petitioner “shall mitigate all project-generated traffic impacts as recommended and/or required by the TIAR approved by the DOT.” (Emphasis added). Petitioner has thus committed to complete any mitigation measures recommended or required by the TIAR, or by the DOT in its approval of the TIAR.

Intervenor contends that the TIAR presents no evidence for its determination that the anticipated pedestrian/bicycle use and transit use will provide a total trip reduction of 10 percent. Intervenor’s Statement of Position, at 4. The estimated 10 percent reduction in trips is standard practice followed by a licensed traffic engineer in the preparation of a TIAR, and that is broadly based upon the national averages for use of public transit, bicycling, and other means of transportation. See U.S. Census Bureau, 2005-2009 American Community Survey. Nonetheless,

even if no trip reduction is included in the TIAR’s calculations, the Level of Service (“**LOS**”) ratings would not be affected. In other words, whether or not the anticipated pedestrian/bicycle use and transit use is incorporated into the analysis, there is no change to the TIAR’s recommendations. **Petitioner’s Rebuttal (“PR”) Ex. 26.**

Intervenor also asserts that the TIAR does not “sufficiently address regional traffic analysis and how to offset those impacts” and recommends that Petitioner “commit to the level of funding and participation for Petitioner’s pro rata share of regional transportation improvements.” Intervenor’s Statement of Position, at 4-5; Intervenor’s Written Testimony, at 7. In contrast to Intervenor’s assertion regarding the TIAR’s analysis of regional traffic, the TIAR considered the volumes along the two regional highways within the study area, Kaumuali’i Highway (Route 50) and Halewili Road (Route 540), as well as the anticipated vehicular traffic from the approved housing subdivision, ‘Ele‘ele Iluna. **Petitioner’s (“P.”) Ex. 3** at App. E, §§ 3.1, 4.5. Moreover, a complete regional analysis would require information as to where the residents of the region—in addition to the anticipated residents of Lima Ola—live, work, and will work. Such an analysis would be beyond the scope of an individual development such as Lima Ola. In regards to Intervenor’s proposed condition that Petitioner fund a pro rata share of improvements, no such requirement was raised or considered by the DOT. See Office of Planning’s (“**OP**”) Ex. 6-7. The TIAR sufficiently addresses regional traffic analysis and no amendment to Petitioner’s Proposed Condition No. 2 is required.

2. Impacts and Mitigation Measures Affecting ‘Ele‘ele Elementary School

As noted in the Petition, and reiterated by Intervenor, ‘Ele‘ele Elementary School may be at full capacity toward the later stages of the Project. Pet., § VI.A. The Hawai‘i Department of Education (“**DOE**”) stated in its letter that it will “have to consider methods for handling additional

enrollment beyond what [‘Ele‘ele Elementary School] is currently capable of handling” and “[i]f the anticipated growth is significant, the DOE will consider imposing school impact fees in the area.” **P. Ex. 15-A.** It is apparent that the DOE will determine the appropriate means of handling additional enrollment in conjunction with the planning of additional phases of the Project. Communication is ongoing with the DOE, and Petitioner will continue to work closely with the DOE during all phases of the Project to assure that there is adequate space in the regional schools.

Further, Petitioner recognizes that it is a standard practice of the DOE to impose school impact fees when necessary. For the initial phase of development, no school impact fees have been levied. Petitioner will notify the DOE of the estimated phase densities prior to development of each additional phase of the Project. This should provide the DOE with the information necessary to evaluate methods to handle additional enrollment, such as the imposition of school impact fees. Accordingly, Petitioner would be willing to agree to the following condition:

Petitioner shall provide the DOE with estimates of the anticipated population densities prior to each phase of development. Petitioner shall coordinate all mitigation measures with the DOE and fund any school impact fees that are assessed.

3. Drainage and Flooding Impacts and Mitigation Measures

a. Drainage

Intervenor has proposed the following condition relating to drainage:

Petitioner shall fund, design, and construct any drainage system improvements required to prevent adverse impact resulting from the development of the Project. Petitioner shall be required to prevent runoff from the Petition Area from adversely affecting State highway facilities, downstream properties, and the ocean. Petitioner shall submit the drainage plans to the DOT and appropriate State and County agencies for review and approval.

Intervenor’s Written Testimony, at 8. Intervenor’s proposed condition is substantially the same as Petitioner’s Proposed Condition No. 9. Intervenor adds the following additional requirements:

(1) that Petitioner be required to prevent runoff from adversely affecting State highway facilities and the ocean, and (2) that Petitioner submit drainage plans to the DOT.

In regards to the first additional requirement, Petitioner is amenable to addressing Intervenor's concerns by amending the language of its Proposed Condition No. 9 to incorporate the condition proposed by OP. OP's Proposed Condition No. 6 contains similar language as Intervenor's proposed condition, and therefore Petitioner believes that the incorporation of OP's proposed condition sufficiently addresses Intervenor's concerns. Specifically, the amended condition would state:

Petitioner shall design and construct stormwater and drainage system improvements in compliance with applicable federal, State, and County laws and rules, and maintain the improvements, or cause to be maintained, as designed. To the extent feasible, Petitioner shall mitigate nonpoint source pollution by incorporating low impact development practices for on-site stormwater capture and reuse into the Petition Area's site design and landscaping to reduce runoff and prevent pollution of affected State highway facilities, downstream properties, receiving gulches and streams, and estuaries that connect with coastal waters. Petitioner shall submit the drainage plan to the appropriate State and County agencies for review and approval.¹

As to the second additional requirement, Petitioner has already agreed to submit the drainage plan to the appropriate State and County agencies for approval. There is no need for the DOT to be specifically designated to receive drainage plans.

b. Flooding

Intervenor contends that Petitioner has not identified the inundation threats posed by Kapa Reservoir. Intervenor's Statement of Position, at 6. Petitioner has actively solicited comments and information pertaining to Kapa Reservoir. Based on the information Petitioner

¹ The incorporation of OP's proposed condition also appears to address Intervenor's concerns—although beyond the scope of her stipulated intervention—regarding storm and surface water runoff quality. See Intervenor's Written Testimony, at 8.

received, Kaua‘i Emergency Management Agency (“**KEMA**”) and Hawaii Emergency Management Agency [(“**HI-EMA**”) have identified no threat posed by Kapa Reservoir.

As Petitioner explained in a response to KEMA, Kauai Coffee Company (“**Kauai Coffee**”) monitors the water levels of Kapa Reservoir daily. Water entering the reservoir is regulated by Kauai Coffee, rather than by natural causes. Should there be a need to quickly reduce the water level in the reservoir, Kauai Coffee has a procedure in place to flow water into fields through a network of irrigation ditches and pumps. In lieu of a spillway, Kapa Reservoir has an emergency 24-inch overflow pipe as a safety feature. **P. Ex. 4** at Ex. 8.

KEMA has stated that it is satisfied with Petitioner’s “response and actions relating to the monitoring and water level regulation of Kapa Reservoir, along with the inclusion of the County Housing Agency as a contact in the dam operator’s Emergency Response Plan. This adequately addresses previously stated concerns relating to Kapa.” **P. Ex. 20**. HI-EMA has expressed no concern regarding Kapa Reservoir.

4. Impacts and Mitigation Measures for Offsite Recreation Facilities

Intervenor contends that Petitioner has not adequately identified and addressed the impact of an additional 550 housing units on the nearby and regional recreation facilities. Intervenor’s Statement of Position, at 6. The County Subdivision Ordinance, Section 9-2.8, requires 1.75 acres of land for park and playground purposes for each one thousand persons or fraction thereof. Kaua‘i County Code § 9.2.8(d)(1). It is estimated that the total stabilized resident population of Lima Ola will be 1,508 from 2029 onward.² See **PR Ex. 30**. Based on this estimated population, and the

² The Kaua‘i County Code also provides a formula for calculating population density: Population density is calculated as 3.5 persons per dwelling unit for single-family dwelling units and duplexes; and 2.1 persons per dwelling unit for multi-family dwelling units. *Id.* § 9.2.8(d)(2). Using the Kaua‘i County Code’s formula, the total estimated population for the Project is 1,386 persons. Based on this estimated population, and the required 1.75 acres per one thousand persons, the total acreage of required park lands is 2.4255 acres.

required 1.75 acres per one thousand persons, the total acreage of required park lands is 2.639 acres.

The Project will have a 3.1-acre community park that will be developed and built within the Project during Phase 1. See P. Ex. 12-C, 13-B at Ex. 2. Accordingly, the Project will exceed the required park space under the Kaua‘i County Code by more than 0.4 acres.

In addition, residents of the Project will have access to neighboring park lands and public parks in the Kōloa District and the Waimea District. The County Department of Parks and Recreation administers 16 neighborhood parks, 7 beach parks, 4 district parks, 2 passive parks, 1 cultural preserve, and 7 neighborhood centers, totaling almost 206 acres of park and recreational facilities within the Kōloa and Waimea Districts. See P. Ex. 16. Additionally, A&B Properties, Inc. (“**A&B**”) has prepared a master plan for its neighboring properties that indicates an approximately 20-acre park is to be situated adjacent and makai of the Petition Area. **P. Ex. 3**, at 391.

Intervenor has proposed a condition that Petitioner “shall commit to the expansion of Salt Pond Beach Park and facilitate other public coastal recreation spaces within 3 miles of the Petition Area.” Intervenor’s Written Testimony, at 8. As noted above, the 3.1-acre park exceeds the Kaua‘i County Code requirements. Further, the expansion of any park and coastal recreation space is within the scope of the County Department of Parks and Recreation. The County Department of Parks and Recreation supports construction of the Project and has not recommended additional commitments by Petitioner. **P. Ex. 3** at App. B.

5. Impacts and Mitigation Measures Related to Emergency Shelters

Intervenor states emergency shelters are open to all and therefore the adequacy of the emergency shelter capacity is not adequately addressed. Intervenor’s Statement of Position, at 6.

In contrast, KEMA has stated that it does not anticipate Lima Ola residents “causing a strain on current shelter resources at ‘Ele‘ele Elementary School.” **P. Ex. 20.** KEMA stated that these shelter facilities would provide enhanced protection for those who would be located in a storm-surge inundation area. Id. During other emergency situations, Lima Ola residents will be asked to shelter-in-place. Id. Nonetheless, as noted in the Petition, Petitioner is considering KEMA’s request to construct the proposed community center in a manner that would allow it to serve as an evacuation shelter. Id.

Intervenor also proposes a condition that Petitioner “fund and install outdoor warning sirens serving the Petition Area as determined by [KEMA] and [HI-EMA].” Intervenor’s Written Testimony, at 9. As noted in HI-EMA’s November 28, 2016 letter, its “siren relocation and upgrade project will ensure siren coverage of the proposed development location.” OP Ex. 11. In light of HI-EMA’s siren relocation and upgrade project, Intervenor’s proposed condition is unnecessary.

6. Relationship of Lima Ola to Development Plans for Adjacent Properties

Intervenor argues that Petitioner has not identified the relationship of the Project with adjacent Agricultural District lands owned by A&B and the effect this reclassification may have on the urbanization of those lands. Intervenor’s Statement of Position, at 7. Lands adjacent to the Petition Area are owned by A&B and are expected to be the site of a mixed-use development. **P. Ex. 13-A**, Chapter 3.

The Petition Area was purchased from A&B with a deed restriction that reserved use of the parcel for affordable housing or continued agricultural production. **P. Ex. 1.** In the past, housing in this general area (as well as throughout the rest of Kaua‘i) has coexisted with agriculture—first in the 1970’s with sugar cane production neighboring the initial development

east of Kaumuali‘i Highway, and later with coffee farming neighboring the development by Kaua‘i Habitat for Humanity. Lima Ola will have a positive impact on existing agricultural production by providing much needed affordable housing for the area workforce. The lack of affordable housing has made it more difficult for Kauai Coffee to recruit and retain employees. Development of workforce housing at Lima Ola may facilitate and enhance the labor pool needed to keep Kauai Coffee operational. See P. Ex. 13-B at Exhibit 3.

The cumulative impact of a boundary amendment is not a decision-making criteria required by the Hawai‘i Revised Statutes (“**HRS**”) or Hawai‘i Administrative Rules (“**HAR**”). See HRS § 205-17; HAR § 15-15-77(b). Rather, the HRS requires the Land Use Commission of the State of Hawai‘i (the “**LUC**”) to consider the following: (1) conformity to the Hawai‘i State Plan and Hawai‘i Functional Plans; (2) conformity to the applicable district standards; (3) impact on natural systems or habitats, cultural, historical, or natural resources, maintenance of other natural resources, commitment of state funds and resources, provision for employment opportunities and economic development, and provision for housing opportunities; (4) the general plan, community, development, or community development plans; (5) representations and commitments made by the petitioner; and (6) the standards and criteria set forth in HRS § 205-50. HRS § 205-17; see also HAR § 15-15-77(b) (including, in addition to the aforementioned factors, lands in intensive agricultural use for two years prior to the date of filing a petition).

The grant of a boundary amendment in this case would result in an Urban District neighboring the A&B lands. This may be significant only as to the standards for determining the boundaries of the Urban District. HAR § 15-15-18. One of the standards addressed in HAR § 15-15-18 is that “[l]and contiguous with existing urban areas shall be given more consideration than non-contiguous land, particularly when indicated for future urban use on state or county general

plans or county community plans or development plans.” HAR § 15-15-18(4). If the Petition Area is granted a boundary amendment, then the A&B lands would be contiguous with an existing urban area. However, this is only one factor that the LUC must consider in the event that A&B petitions for a boundary amendment.

Moreover, the reclassification of the Petition Area will not affect the overall agricultural production in the County, or State. Kauai Coffee intends to plant additional plantings within existing fields to improve overall production per acre. In addition, the coffee variety grown in the Petition Area is a coffee variety that Kauai Coffee planned to reduce production. See Exhibit 13-B at Exhibit 3.

There is an adequate amount of available agricultural lands surrounding the Petition Area and within the County. Of the 3,000 plus acres currently being utilized for coffee farming by Kauai Coffee, the Petition Area represents less than three percent (3%) of the total area farmed. Blocks of farmland, in greater acreage than the Petition Area, and within the vicinity of the currently farmed area, lay fallow and are available for Kauai Coffee’s farming use. Id. The acreage for the Lima Ola project will be too small to negatively affect current or realistic Kauai Coffee operations.

According to the U.S. Department of Agriculture National Agricultural Statistics Service (“NASS”), coffee was harvested on 6,900 acres statewide. See 2016 State Agricultural Overview, NASS, available at https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=HAWAII. The 75-acre Petition Area represents less than 1.1% of the statewide acreage used for coffee farming.

7. **Timely Public Notice and Opportunities to Testify and Comment on the Project**

Intervenor contends that the “magnitude of Lima Ola has not been well communicated to the residents of Hanapepe-Eleele impeding an understanding and discussion of the magnitude of the projects [sic] impacts—direct and indirect, short-term and cumulative, and offsite.” Intervenor’s Written Testimony, at 6.

Lima Ola has actively sought to involve the community in the development of the Project and to provide the best available information to the public. Initial outreach began in 2011 with the formation of a Citizen Advisory Committee. **P. Ex. 13-A**. In 2014, a website was developed and made available to the public. The Lima Ola website can be accessed via www.limaolakauai.net, and is included as a link on the County of Kaua‘i website. Posted on the website are meeting dates, as well as Petitioner’s 201H Application and Final Environmental Assessment.

Petitioner held public information meetings as part of its pre-draft environmental assessment consultations on September 28, 2011, February 22, 2012, and August 24-26, 2015. See P. Ex. 4 at Ex. 8. Petitioner made available the draft Environmental Assessment for public comment pursuant to HRS § 343-5 and public consultation meetings were held on May 24-25, 2016; written comments received by the Petitioner during the Environmental Assessment process are included in **Petitioner’s Exhibit 3** at Appendix B. Public meetings were also held on November 9-10, 2016. Petitioner received comments from the community and agencies in response to its HRS Chapter 201H Application as noted in **Petitioner’s Exhibit 4** at Exhibit 8. Additional comments discussing the Project were reviewed by Petitioner and are attached to the Petition as **Petitioner’s Exhibit 25**. Petitioner has provided to the public the best available information and informed the public about the Project through various means, including numerous

public meetings, its website, and the Final Environmental Assessment-Finding of No Significant Impact.

B. Intervenor's Recommended Conditions Exceed Stipulated Scope of Intervention

Intervenor has also recommended conditions that exceed the stipulated limits of Intervenor's intervention in this boundary amendment proceeding as so ordered by the LUC. See Order Accepting Oral Stipulation to Admit Jean Nishida Souza as an Intervenor in the District Boundary Amendment Proceeding. Accordingly, Petitioner does not address or recognize such conditions. Further, the majority of Intervenor's concerns that exceed the stipulated limits of the intervention are adequately addressed by Petitioner's Proposed Conditions. Specifically, Petitioner's Proposed Condition No. 1 (Affordable Housing), No. 8 (Water), No. 11 (Compliance with Representations), No. 12 (Notice to Commission), No. 13 (Annual Reports), and No. 14 (Release of Conditions) address the concerns raised by Intervenor in its Proposed Condition No. 1 (Affordable Housing), No. 3 (Water Resource Allocation), No. 11 (Compliance with Representations to the Commission), No. 12 (notice), and No. 14 (Annual Reports).³ Accordingly, amendment of Petitioner's Proposed Conditions is not necessary as to these purported concerns.

In regards to Intervenor's Proposed Condition No. 5 (Street Lights), Petitioner acknowledges that this condition is beyond Intervenor's stipulated scope of intervention, but nonetheless recognizes that a similar concern was raised by OP. Accordingly, Petitioner is amenable to amending its Proposed Condition No. 6, Endangered Species, to incorporate both Intervenor's and OP's proposed conditions to add the additional subpart:

E. All outdoor lighting shall be shielded to prevent upward radiation so as to reduce the potential for seabird attraction. Shielding shall conform to the County's standards for street lights to prevent light diffusion upward into the night sky.

³ Petitioner objects to the inclusion of Intervenor as a recipient of the annual report. The annual reports filed with the LUC are available to the public through the LUC's website.

The final sentence of Intervenor's proposed condition regarding street lights is already included in Petitioner's Proposed Condition No. 6, Subpart C.

C. Reclassification of the Entire Petition Area Is Reasonable

Petitioner opposes Intervenor's recommendation that the LUC grant partial approval of a grant of reclassification of the Petition Area. The Infrastructure Development Plan for Lima Ola Workforce Housing contains information on phasing, the number of housing units, and the composition of housing units per phase. **P. Ex. 13-B** at Ex. 2. Further information on housing units, phasing, and composition can be found in the 201H Application and exhibits, and the Final Environmental Assessment. As the Infrastructure Development Plan indicates, prior to Phases 2, 3, and 4, Petitioner will complete updates to the Market Study, Traffic Impact Analysis Report, and Water Master Plan. County and State permits, community engagement, and funding source identification will be done prior to each phase of development. The future phases of Lima Ola will function as a land bank, serving as a critical resource to meeting the affordable housing needs of future generations. Each phase of Lima Ola will be able to use the latest building technology, best available financing, and serve the most pressing affordable housing needs as indicated by market studies presented at the time of development per phase.

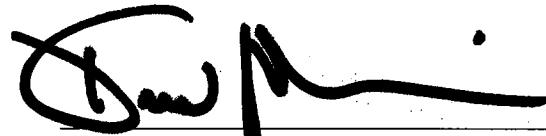
Pursuant to HAR § 15-15-78(a)(1), the LUC has the authority to reclassify the entire Petition Area. Although full development of the Petition Area cannot be reasonably completed within ten years after the date of the LUC's decision in this matter, reclassification of the entire Petition Area is reasonable, as discussed in Petitioner's Petition for Declaratory Order and Memorandum in Support of Petition for Declaratory Order.

D. Conclusion

Petitioner is committed to avoiding, minimizing, and/or mitigating impacts identified by Intervenor. In this effort, Petitioner has proposed the conditions and commitments discussed herein.

Based on the foregoing, Petitioner respectfully requests that the LUC find that the Petition complies with the necessary requirements of a petition for boundary amendment pursuant to HAR § 15-15-50. Petitioner also respectfully requests that the LUC find that the proposed development meets the standards for determining Urban District boundaries pursuant to HAR § 15-15-18, and therefore, grant the reclassification of the entire Petition Area from the Agricultural District to the Urban District.

Dated: Honolulu, Hawai‘i, June 2, 2017.



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approximately 75 acres, Tax Map Key)	
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_____)	

CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing document will be duly served upon the following by mailing said copy, postage prepaid, first class, in a United States post office (“MAIL”) or by hand delivery (“HD”):

COUNTY OF KAUA'I PLANNING DEPARTMENT 4444 Rice Street Līhu'e, Kaua'i, Hawai'i 96766	MAIL
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STATE OF HAWAI'I OFFICE OF PLANNING 235 South Beretania Street 6th Floor, Leiopapa A Kamehameha Building Honolulu, Hawai'i 96813	HD
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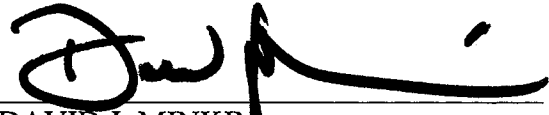
DAWN TAKEUCHI-APUNA, ESQ. Deputy Attorney General 425 Queen Street Honolulu, Hawai'i 96813	HD
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KAUA'I COUNTY PLANNING COMMISSION c/o County of Kaua'i, Planning Department 4444 Rice Street Līhu'e, Kaua'i, Hawai'i 96766	MAIL
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JEAN NISHIDA SOUZA
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(Intervenor)

MAIL

DATED: Honolulu, Hawai'i, June 2, 2017.

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

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