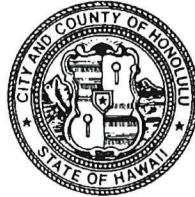


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluluodpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR



GEORGE I. ATTA, FAICP
DIRECTOR

ARTHUR D. CHALLACOMBE
DEPUTY DIRECTOR

DR17-59
2017/GEN-6(ry)
1512475

September 28, 2017

Mr. Daniel Orodener
Executive Officer
State Land Use Commission
Department of Business, Economic
Development and Tourism
P. O. Box 2359
Honolulu, Hawaii 96804

2017 OCT - 3 A 9:48
LAND USE COMMISSION
STATE OF HAWAII

Dear Mr. Orodener:

SUBJECT: DR17-59 Petition for Declaratory Ruling to Designate
Important Agricultural Lands (IAL) in Kunia, Central Oahu
Tax Map Keys: 9-2-001: 001 (por.), 9-2-001: 005, and 9-2-004: 009

We have reviewed the subject petition and have no objections to the Petition proposing to designate approximately 1,550 acres of land in Kunia as IAL (hereinafter referred to as the "Property"). We have the following comments for your consideration.

1. The Property is zoned AG-1 Restricted Agricultural District and located outside of the City's Ewa Development Plan (EDP) and Central Oahu Sustainable Communities Plans' (COSCP) Community Growth Boundaries.
2. Petitioner's proposed designation of IAL land in Kunia is consistent with the objectives and policies of the City's General Plan intended to maintain the viability of agriculture on Oahu. Furthermore, granting the Petition is consistent with the City's long-range vision, policies, principles, and guidelines of the EDP and COSCP intended to protect open space and prime agricultural land in the Ewa and Central Oahu regional planning districts.
3. The Department of Planning and Permitting (DPP) is finalizing its proposed IAL map. Under the public review version of the IAL map and the final map now being prepared, all of Monsanto's land in Kunia meets the top three criteria: 1) water availability, 2) soil qualities, and 3) agricultural production, for designating land as IAL, including approximately 601 acres of land sought by the Petitioner for exclusion from IAL designation. Therefore, they are all proposed

Mr. Daniel Orodener
September 28, 2017
Page 2

for inclusion in our final map. An excerpt of the draft IAL map is enclosed for your information.

4. The DPP continues to support the inclusion of all qualifying lands in the Kunia area, including lands controlled or leased by Monsanto, for IAL designation. Monsanto's lands are large, gently sloping parcels, with minimal gulley interruptions, meets all of the IAL criteria for IAL designation, and constitute a major share of land in the Kunia area, some of which exhibited the highest levels of cane sugar production during Oahu's past plantation era.
5. Except for the exclusion of Tax Map Key: 9-2-001: 001, Lot B, which is intended for conveyance to the National Park Service for the Honouliuli National Monument, the Petitioner did not offer a compelling reason for the exclusion of the remaining 557.927 acres of land located along Kunia Road from IAL designation. The Petitioner comments that the remaining 557.927 acres it owns are intended for continued agricultural use and designation as IAL would result in the loss of flexibility in future management of these lands. The loss of flexibility over future uses of the remaining lands is not a compelling reason to exclude these lands from IAL designation. Accordingly, the DPP supports the inclusion of the remaining 557.927 acres of Monsanto's land into IAL, which would form a major portion of IAL designated lands in Kunia should its inclusion be approved by the City Council and ultimately by the Land Use Commission.

In summary, we have no objections to the Petition for designation of approximately 1,550 acres of land as IAL. However, with respect to the remaining approximately 557.927 acres proposed by the Petitioner for exclusion from IAL designation, there is no compelling reason to support excluding these land from IAL designation.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Raymond Young of our staff, at 768-8049.

Very truly yours,




Kathy K. Sokugawa
Acting Director

KKS:ah

Enclosure

cc: Richard Lewallen, Corporation Counsel
Jennifer A. Lim, Carlsmith Ball, LLP

Legend

-  Monsanto Owned Land
-  DR17-59 Proposed IAL Designation
-  Draft Proposed IAL Parcels

0 0.5 1 2
Miles

