



Kealia Kai Owners Association (KKHOA)
C/O: Associa Hawaii (Alina Kuznetsova)
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December 22, 2017

State of Hawaii Land Use Commission
Department of Business, Economic Development, and Tourism
P. O. Box 2359
Honolulu, HI 96813
Attn: Mr. Daniel Orodener

SUBJECT: Petition filed by Kealia Properties LLC, Docket No: A17-803
For the proposed project identified as Kealia Mauka Homesites on Kauai
Comments and Concerns from the Kealia Kai Home Owners Association

Dear Mr. Orodener,

On behalf of the Kealia Kai Home Owners Association (“KKHOA”), I hereby present to you and the Land Use Commission our comments and feedback regarding the petition filed with LUC by Kealia Properties LLC (“Developer”) proposing to build 235 home sites on 53.4 acres of land in Kealia, Kawaihau, Puna, Island of Kauai, State of Hawaii, with the TMK: (4) 4-7-004:001.

At this point, we do not have enough information about the proposed development to fully apprise all of the owners at Kealia Kai and take a vote on whether we oppose or support this development. We look forward to discussions with the developer and obtaining additional information so we can fully understand the impacts of the proposed project on the area. Thank you for including us in this process.

As community members, we naturally have concerns, most but not all of which are raised in the Kealia Mauka October 2017 Environmental Impact Statement (EIS) Preparation Notice. With some additional information and better defined plans for the development, we believe we can be supportive of the project, if our concerns are addressed. Thus, we are raising our concerns with you and plan to discuss them with the Developer as well.

Concern #1 - Traffic: First and foremost, there is no doubt that the project will increase traffic in the already congested area in the North end of Kapaa. Access to the project should be carefully evaluated

including necessary improvements to Kuhio Highway that need to be incorporated to safely accommodate the traffic along with signalized access points to the developments in the area.

Concern #2 - Density: A plan with additional 235 homes in the North side of Kapaa is not ideal from our personal vantage point, but from the overall Island's perspective, it is probably an acceptable tradeoff in order to provide needed, more affordable housing. Having said that, 235 additional homes in that area is probably enough and would likely better serve the residents, if they were located closer to Kapaa. The Developer owns significant land holdings closer to Kapaa without the agricultural characteristics of the proposed rezoning location. Those lands also include rodeo grounds, equipment buildings, and the former location of the Kealia sugar mill, all of which are not in agricultural production. We would ask the developer to consider evaluating alternative locations on other land parcels that he owns for the proposed project.

Concern #3 – View from Kuhio Highway: The Kealia Mauka homes on Kuhio Highway, as planned, may be somewhat of an eyesore both from the Highway and from some homes at Kealia Kai. We at Kealia Kai were required to maintain 300' setbacks for residences from Kuhio Highway, install a large landscaped berm of Hau and Bougainvillea along our border with the Highway, and preserve critical view corridors from the Highway to minimize the view of our homes. We would ask the equivalent from Kealia Mauka. Specifically, we would ask that the 22 homes adjacent to Kuhio Highway (less than 10% of the total) be eliminated and replaced with a green area, and a similar landscape berm of Hau and Bougainvillea. We believe everyone on the Island, as well as the tourists, would prefer to see that in lieu of having homes right on the Highway with what appears to be zero setback. If the project is relocated closer to Kapaa near the rodeo grounds where a large grove of ironwood exists, that would effectively screen the development from view, if it were maintained.

Other Concerns: Other concerns we have are not as problematic in our view, but given the relatively short notice we have had about this planned development, we would like to better understand them and look forward to doing so both through review of the EIS when complete, additional studies and evaluations by the Developer, and discussions with the Developer. Such additional concerns include:

- Any potential adverse impact on the availability of **public services** (fire, police, paramedics, schools, etc.), public facilities, parks, drainage, waste water, and other County and State public services provided to the area.
- Any potential adverse impact on **potable water** availability (private water sources serve the area), though our preliminary analysis suggests this is not a concern but we believe this should be confirmed (see Concern #2 above).
- Any potential adverse impact on **agricultural water** quantity, allocation, easements, and interference with the infrastructure currently in place, for the Kealia Kai Subdivision which is agriculturally zoned and relies on irrigation water crossing the Developer's property.
- Excessive potential adverse impact on **property values** in our subdivision. We do not expect Kealia Mauka to have a positive impact on our property values, and in fact expect it to be at least somewhat negative. We just want some more time to ensure it would not be expected to have an excessive negative impact and believe location and design are critically important in this area.

- The permanent loss of **quality agricultural lands** and the impacts of the loss of resources that come from fertile soil that exists at the proposed rezoning location.

Thank you for your consideration of our concerns and suggestions. We hope that the most serious of them can be mitigated. We look forward to further evaluation and discussion of this proposed development and rezoning application.

Please do not hesitate to contact me, the Board of Directors of Kealia Kai HOA, or our subdivision management representative with any questions.

Thank you.

Best regards,

Adrian Saralou

Adrian Saralou
Kealia Kai Home Owners Association
President