

Group 5 - Responses to Gov. Agencies and Organizations

**Dept. of Education
Clean Water Branch, DOH
Environmental Planning Office, DOH
Wastewater Branch, DOH
Department of Human Services
Dept. of Water, Kauai County
Division of Aquatics, DLNR
Commission on Water Resource Management, DLNR
Office of Planning, State of Hawaii
Planning Department, County of Kauai
Wailua-Kapa'a Neighborhood Association**

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

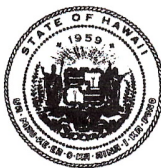
TO: Kenneth G. Masden
Public Works Manager, DOE
PO Box 2360
Honolulu, Hi 96804

We are pleased to respond to your June 4, 2015 comments on the DEIS for HoKua Place as follows:

Thank you for your comment. The Developer is committed to working with you as necessary during the final planning stages and the construction phase of HoKua Place.

Respectfully Submitted,

Ron Agor, Architect



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

June 4, 2015

Mr. Peter T. Young
Ho`okuleana LLC
25 Kaneohe Bay Drive, Suite 212
Kailua, Hawaii 96734

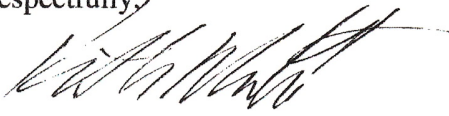
Dear Mr. Young:

The Department of Education (DOE) has reviewed the draft environmental impact statement preparation notice (DEIS) HoKua Place project in Kapaa, Kauai.

The DOE has no comment or concern about the DEIS or the proposed project. We appreciate the opportunities we have had to review these plans several times over the past several years.

If you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8301.

Respectfully,


Kenneth G. Masden
Public Works Manager
Planning Section

KGM:jmb

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017
RE: Response to Comments on HoKua Place DEIS
TO: Alec Wong PE, Chief
Clean Water Branch, DOH
PO Box 3378
Honolulu, Hi 96801

We are pleased to respond to your June 3, 2015 comments on the DEIS for HoKua Place as follows:

Page 1, Item 1: The Developer is committed to reviewing policies HAR, Section 11-54-1.1, HAR, Section 11-54-3 and HAR, Sections 11-54-4-11-54-8 during the final development document phase and incorporate all applicable sections stated above into the construction of HoKua Place.

Page 2, Item 2: The Developer intends to obtain a NPDES permit to address discharges of wastewater, storm water runoff into State surface waters according to Chapter 11-55, HAR.

Page 2, Item 3: The project does not involve work in, over, or under waters of the United States. However, the preliminary development plans will be forward to the Army Corp of Engineers for comment. Furthermore, the final grading and drainage plan will reflect not allowing any runoffs from the subject site to go beyond the boundaries of the project and into federal and state water.

Page 2, Item 4: The developer is committed to complying to the State's Water Quality Standards.

Page 2, Item 5a. to 5e: The developer intends to treat storm waters as a resource for irrigation of the entire project. The final construction plans for grading and drainage will incorporate basins to store storm waters for use in the proposed irrigation system.

The final development plans will incorporate methods of conserving natural resources, especially storm waters.

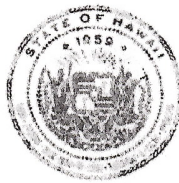
A Best Management Practice (BMP) will be part of the development of the subject land and will focus on the use of storm waters for irrigation.

Basins will be incorporated on site to store storm waters and allow the opportunity to revitalize natural underground water's natural hydrology.

The use of green building practices will be incorporated in the final development plans and specifications, including but not limited to, pervious pavements, the use of native landscape vegetation, reducing runoffs, and minimize use of fertilization.

HoKua Place is a new development and opportunities to have design storm infrastructure to restore ecological function while maintaining and enhancing hydraulic capacities.

Respectfully Submitted,
Ron Agor, Architect



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
EMD/CWB

06004PJF.15

June 3, 2015

Mr. Peter T. Young
Ho'okuleana LLC
1539 Kanapu'u Drive
Kailua, Hawaii 96734

Dear Mr. Young:

**SUBJECT: Draft Environmental Impact Statement for the HoKua Place Project
Kawaihau, Island of Kauai, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated May 8, 2015, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and HAR, Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects

natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g., minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
- c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,


ALEC WONG, P.E., CHIEF
Clean Water Branch

JF:ay

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Laura Leialoha Phillips, McIntyre, AICP
Program Manager, Environmental Planning Office
PO Box 3378
Honolulu, Hi 96801

We are pleased to respond to your May 12, 2015 comments on the DEIS for HoKua Place as follows:

The Developer has reviewed the Land Use Planning Review Program and is committed to adhere to all the applicable standard comments set forth in the program in the development of HoKua Place.

We have examined the Hawaii Environmental Health Portal and are committed to visit it regularly during the final planning of HoKua Place.

The Developer acknowledges the updated Water Quality Standards Maps and is committed to using the updated maps for Kaua'i during the final planning of HoKua Place.

Respectfully Submitted,

Ron Agor, Architect

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to
File

EPO 15-106

May 12, 2015

Mr. Peter T. Young
Ho'okuleana, LLC
HG Kaua'i Joint Venture, LLC
9911 S. 78th Avenue
Hickory Hills, Illinois 60457

Dear Mr. Young:

SUBJECT: Draft Environmental Impact Statement (DEIS) for HoKua Place

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your DEIS dated April 27, 2015. Thank you for allowing us to review and comment on the HoKua Place project available on the OEQC website at:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Kauai/2010s/2015-05-08-KA-5E-DEIS-HoKua-Place.pdf

The DEIS was routed to various branches. The various branches will provide specific comments to you if necessary. EPO recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/home/landuse-planning-review-program/>. Projects are required to adhere to all applicable standard comments.

We encourage you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

You may also wish to review the revised Water Quality Standards Maps that have been updated for all islands. The Water Quality Standards Maps can be found at:

<http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/water-quality-standards/>.

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,

A handwritten signature in cursive script, appearing to read "Laura Leialoha Phillips McIntyre".

Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

c: Hookuleana LLC
LUC
CWB, WWB, HEER, DHO Kauai, DOH-DDEH (via email only)

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Sina Pruder, PE, Chief
Wastewater Branch
State of Hawaii Department of Health
PO Box 3378
Honolulu, Hi 96801

We are pleased to respond to your May 20, 2015 comments on the DEIS for HoKua Place as follows:

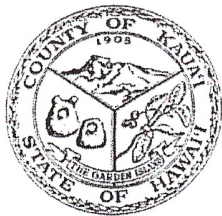
Page 102 of Volume I FEIS and Exhibit G of Volume II describes the preliminary finding for the capacity of the Kaua'i Wailua Wastewater Treatment Plant's (KWWTP) capacity and the Developer's agreement to facility cost contribution to the repair and upgrade of the system.

Attached please find a letter from the County Division of Wastewater Management confirming the viability of HoKua Place tying into the KWWTP. Furthermore, the Developer will be submitting the final scope of work that will be required for HoKua to connect to KWWTP to your branch for approval.

Respectfully Submitted,

Ron Agor, Architect

Bernard P. Carvalho, Jr.
Mayor



Larry Dill, P.E.
County Engineer

Gary K. Heu
Managing Director

Lyle Tabata
Deputy County Engineer

DEPARTMENT OF PUBLIC WORKS

County of Kaua'i, State of Hawai'i

4444 Rice Street, Suite 275, Līhu'e, Hawai'i 96766

TEL (808) 241-4992 FAX (808) 241-6604

August 13, 2012

Ho'okuleana LLC
25 Kāne'ohe Bay Drive, Suite 212
Kailua, HI 96734
Attention: Mr. Peter T. Young, President

Via email only to PeterYoung@Hookuleana.com

SUBJECT: PRE-ASSESSMENT CONSULTATION, ENVIRONMENTAL ASSESSMENT,
KAPA'A HIGHLANDS II PROJECT (TMK (4) 4-3-003:001)

Dear Mr. Young:

The County of Kaua'i, Department of Public Works, Division of Wastewater Management (Division) has reviewed the information submitted with your request for pre-consultation on an Environmental Assessment (DEA) for the subject project.

The Division concurs with your assessment of the feasibility for connection of the project to the County sewer system, and also with the anticipated wastewater flow volumes identified in the Preliminary Engineering report included with the DEA. The Division also concurs that the proposed connection of the project to the County sewer system will not negatively affect the existing wastewater system capacity.

During the design of the wastewater system for the project, the applicant shall comply with all requirements of the County Sewer Design Standards (1973) and State of Hawai'i, Department of Health requirements. Prior to final subdivision approval by the Department of Public Works, all required sewer improvements shall be constructed or bonded, and all required fees shall be paid at the rates applicable at the time of payment, including but not limited to the Wastewater Treatment Capacity Assessment (WTCA) and Sewer Connection Charges (SCC).

We appreciate the request for pre-consultation on this proposed project. If you have any questions, please call, at (808) 241-4084.

Very truly yours,

EDWARD TSCHUPP

Chief, Wastewater Management Division

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File

LUD - 4 4 3 003 001 DEIS
HoKua Place-ID2250

May 20, 2015

Mr. Benjamin David Johnson
Manager
HG Kauai Joint Venture LLC
9911 South 78th Avenue
Hickory Hills, IL 60457

Dear Mr. Johnson:

Subject: Draft Environmental Impact Statement (DEIS)
Hokua Place (Kapaa Highlands), Kapaa Town, Kauai, 96746
TMK (4) 4-3-003: 001


Thank you for allowing us the opportunity to provide comments on the above subject project. We have the following information to offer.

The subject project is located in the critical wastewater disposal area as determined by the Kauai County Wastewater Advisory Committee. We have two (2) treatment individual wastewater systems (IWSs) (septic tanks) for the subject tax map key (TMK) number, i.e., for the Kapaa Intermediate School and the Kapaa Solar Farm located on Olohena Road.

The wastewater generated from the proposed Hokua Place project is planned to be connected to the County of Kauai Wailua Wastewater Treatment Plant (WWTP) for treatment and effluent disposal. However, the DEIS did not clearly demonstrate that the existing Wailua WWTP has available capacity and required operation equipment to treat and dispose of the additional wastewater from the proposed Hokua Place project in compliance with Hawaii Administrative Rules, Chapter 11-62, Wastewater Systems. Accordingly, we defer making any determination regarding this project until a detailed review and plan addressing any necessary facility upgrades to the existing Wailua WWTP and effluent disposal system, including implementation schedules, to accommodate the additional wastewater flows from the proposed project is addressed.

Should you have any questions, please contact Mr. Mark Tomomitsu of my staff at (808) 586-4294.

Sincerely,


SINA PRUDER, P.E., CHIEF
Wastewater Branch

LM/MST:lmj

c: Ms. Laura McIntyre, DOH-Environmental Planning Office (15-106)
Ms. Lori Vetter, DOH-WWB's Kauai Staff
Mr. Daniel E. Orodener, State of Hawaii, Land Use Commission
✓ Mr. Peter T. Young, Hookuleana LLC

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Scott Nakasone
Assistant Division Administrator
Department of Human Services
820 Mililani Street, Suite 606
Honolulu, Hi 96813

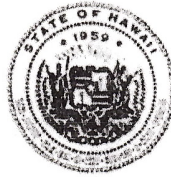
We are pleased to respond to your May 19, 2015 comments on the DEIS for HoKua Place as follows:

The Developer is committed to safeguard the nearby and surrounding properties from fugitive dust. The permit plans and specifications will address the provisions of the Hawai'i Administrative Rules 5-11-60.11.33 on Fugitive Dust.

Respectfully Submitted,

Ron Agor, Architect

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File

EPO 15-106

May 12, 2015

Mr. Peter T. Young
Ho'okuleana, LLC
HG Kaua'i Joint Venture, LLC
9911 S. 78th Avenue
Hickory Hills, Illinois 60457

Dear Mr. Young:

SUBJECT: Draft Environmental Impact Statement (DEIS) for HoKua Place

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your DEIS dated April 27, 2015. Thank you for allowing us to review and comment on the HoKua Place project available on the OEQC website at:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Kauai/2010s/2015-05-08-KA-5E-DEIS-HoKua-Place.pdf

The DEIS was routed to various branches. The various branches will provide specific comments to you if necessary. EPO recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/home/landuse-planning-review-program/>. Projects are required to adhere to all applicable standard comments.

We encourage you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

You may also wish to review the revised Water Quality Standards Maps that have been updated for all islands. The Water Quality Standards Maps can be found at: <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/water-quality-standards/>.

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,

A handwritten signature in black ink, appearing to read "Laura Leialoha Phillips McIntyre".

Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

c: Hookuleana LLC
LUC
CWB, WWB, HEER, DHO Kauai, DOH-DDEH (via email only)

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Mr. Edward Doi
Department of Water
PO Box 1706
Lihue, Hi 96766

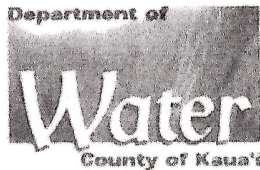
Thank you very much for your comments on the Draft EIS for the HoKua Place.

HoKua Place has tested for a well on site and has made a proposal to dedicate the well site to the DOW to serve HoKua Place as well as other areas.

The Developer acknowledges Conditions 1 through 6 of your recommendations. The recommendations will addressed during the permitting phase4. Recommendation 1 has been incorporated in the FEIS, Page 85.

Respectfully Submitted,

Ron Agor, Architect



Water has no substitute.....Conserve it

June 23, 2015

UID #682

Mr. Peter T. Young
Ho'okuleana LLC.
1539 Kanapu'u Drive
Kailua, HI 96734

Dear Mr. Young:

Subject: Draft Environmental Impact Statement for the Hokua Project (Formerly Referred to as Kapaa Highlands), TMK: 4-3-03:001 por, Kapaa, Kauai

This is in regard to your letter received on May 7, 2015. We have no objections to the proposed Draft Environmental Impact Statement. The following are our comments to the subject Draft Environmental Impact Statement for the Hokua Project (formerly referred to as Kapaa Highlands).

Any actual subdivision or development of this area will be dependent on the adequacy of the source, storage, and transmission facilities existing at that time. At the present time, the existing source, storage, and transmission facilities are not adequate for the proposed project which includes 86 single family lots, 683 multifamily residential units, a 3.1 acre park, and 1.4 acres for commercial use.

Prior to the Department of Water (DOW) recommending building permit or water service approval, the applicant will be required to:

1. Be made aware that the Water Master Plan for the subject project has **not** been approved by the DOW. The DOW recommends that the following statement on Page 77 of the DEIS: *"A Water Master Plan for Hokua Place and Hokua Farm Lots (formerly known as Kapa'a Highlands), has been approved, in concept, by the County Department of Water (DOW),"* be changed or corrected in the Final Environmental Impact Statement.
2. Prepare and receive DOW's approval of a Water Master Plan for full development of the area.
3. Submit a formal request for water service. The applicant shall describe the proposed water meter use. For non-residential use, the applicant shall submit detailed water demand calculations, along with the proposed water meter size, to the DOW for review and approval. DOW conditions for approval may change based on the approved water demands and use.
4. Prepare and receive DOW's approval of construction drawings for the necessary water system facilities and construct said facilities as required in the approved water master plan for the proposed project.

Mr. Peter T. Young

Ho'okuleana LLC.

Subject: Draft Environmental Impact Statement for the Hokua Project (Formerly Referred to as Kapaa Highlands), TMK: 4-3-03:001 por, Kapaa, Kauai

June 23, 2015

Page 2

5. Pay the applicable charges in effect at the time of payment to the DOW. At the present time, these charges include the Facilities Reserve Charge (FRC) which is based on \$4,600 per 5/8-inch water meter/unit or the FRC based on the approved water meter size, whichever amount is greater. FRC offsets may apply for source, storage, and transmission facilities that qualify for offsets, in accordance with the DOW's Rules and Regulations.
6. Receive a "Certification of Completion" notice for the construction of necessary water system facilities from the DOW.

All conditions stated above are subject to the Rules and Regulations of the DOW as amended or as will be amended.

If you have any questions concerning the construction drawings, please contact Mr. Roman Silvestre at (808) 245-5412. For questions concerning the Certification of Completion, please contact Mr. Dustin Moises at (808) 245-5459. For other questions, please contact Mr. Joel Bautista at (808) 245-5441.

Sincerely,



Edward Doi

Chief of Water Resources and Planning Division

c: Ken Taylor (taylorko21@hawaii.rr.com)

4-3-03-001por, T-17058, Hokua Project DEIS, Young/JB:lcc

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Division of Aquatics, DLNR
PO Box 621
Honolulu, Hi 96809

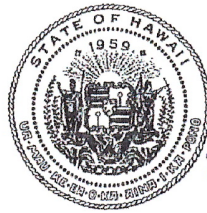
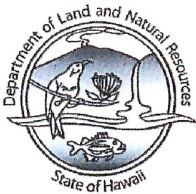
We are pleased to respond to your May 19, 2014 comments on the DEIS for HoKua Place as follows:

Page 2, Comment 1: The Developer is committed to implement BMPs during all phases of the project development to assure minimizing or eliminating negative impacts resulting from construction debris, petroleum products and /or other toxic pollutants entering into the nearby bodies of water as a result of runoffs.

Page 2, Comment 2: HoKua Place will maintain public access in and out of the Waikaea Fishing Area so the fishing public continues to have access to resources in the fishing area.

Respectfully Submitted,

Ron Agor, Architect



RECEIVED
LAND DIVISION
2015 JUN 15 11:09

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 19, 2014

MEMORANDUM



DAR # 5114

TO: DLNR Agencies:
X Div. of Aquatic Resources
X Div. of Boating & Ocean Recreation
X Engineering Division
X Div. of Forestry & Wildlife
X Div. of State Parks
X Commission on Water Resource Management
X Office of Conservation & Coastal Lands
X Land Division – Kauai District
X Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Draft Environmental Impact Statement (DEIS) for the HoKua Place project (formerly referred to as Kapa'a Highlands)

LOCATION: "Situated at (4) 4-3-003:001 (portion) in the Kawaihau District on the island of Kauai"

APPLICANT: HG Kauai Joint Venture, by its consultant, Ho'okuleana LLC

JK ✓
MF ✓
BK ✓
GH ✓

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document which can be found here:

1. Go to: <https://sp01.ld.dlnr.hawaii.gov/LD>
2. Login: Username: LD\Visitor Password: 0pa\$\$word0 (first and last characters are zeros)
3. Click on: Requests for Comments. Click on the subject file "Draft Environmental Impact Statement (DEIS) for the HoKua Place project (formerly referred to as Kapa'a Highlands)", then click on "Files" and "Download a copy". (Any issues accessing the document should be directed to Jonathan Real, Applications/Systems Analyst at 587-0427 or Jonathan.C.Real@hawaii.gov)

Please submit any comments by June 17, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

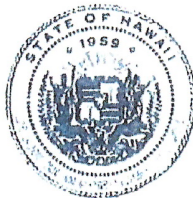
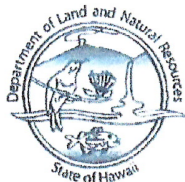
Attachments

- () We have no objections.
() We have no comments.
(X) Comments are attached. Previous comments from

Signed: Altan Miyasaka DAR #5046 still apply
Print Name: Altan Miyasaka They are attached
Date: 6-4-15

Signed: Suzanne D. Case
Print Name: Suzanne D. Case
Date: 6/2/2015

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 18, 2014

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources
- ☒ Div. of Boating & Ocean Recreation
- ☒ Engineering Division
- ☒ Div. of Forestry & Wildlife
- ☒ Div. of State Parks
- ☒ Commission on Water Resource Management
- ☒ Office of Conservation & Coastal Lands
- ☒ Land Division - Oahu District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Environmental Impact Statement Preparation Notice (EISP) for the HoKua Place project (formerly referred to as Kapa'a Highlands)

LOCATION:

"Situated at (4) 4-3-03: por 01 (portion) in the Kawaihau District on the island of Kauai"

APPLICANT:

HG Kauai Joint Venture, by its consultant, Ho'okuleana LLC

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document which can be found here:

1. Go to: <https://sp01.ld.dlnr.hawaii.gov/LD>
2. Login: Username: LD\Visitor Password: 0pa\$\$word0 (first and last characters are zeros)
3. Click on: Requests for Comments. Click on the subject file "Environmental Impact Statement Preparation Notice (EISP) for the HoKua Place project (formerly referred to as Kapa'a Highlands)", then click on "Files" and "Download a copy". (Any issues accessing the document should be directed to Jonathan Real, Applications/Systems Analyst at 587-0427 or Jonathan.C.Real@hawaii.gov)

Please submit any comments by January 20, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- ☐ We have no objections.
- ☐ We have no comments.
- ☒ Comments are attached. *MA*

Signed:

Print Name:

Date:

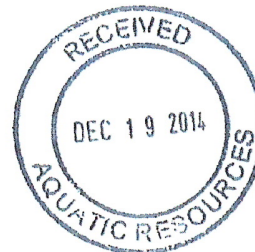
Carty S. Chang
2/13/15

WILLIAM J. AHA, JR.
CHAIRMAN
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

JESSE K. SOUKI
FIRST DEPUTY

WILLIAM M. TAM
DEPUTY DIRECTOR, WATER

AQUATIC RESOURCES
DIVISION AND DEPARTMENTAL
BUREAU OF COMPLIANCE
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RECREATION
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAWAII ISLAND DEVELOPMENT COMMISSION
LAND
STATE PARKS



DAR #5046

JK ✓
KN
BK
GM
MF

A stream within the HoKua Farm Lots flows from north to south along the western boundary of HoKua Place. The path of the stream passes under a bridge on the By-Pass Road at the southwest corner of the property, and empties into the Waikaea drainage canal about 800 ft. downstream from the property. The Waikaea Canal is a regulated fishing area managed by on Kauai. HoKua Place is committed to keeping the flow of the stream consistent to prevent potential health and mosquito problems associated with streams when not flowing naturally.

The Applicant proposes to adhere to applicable laws to minimize soil movement, erosion and compaction during the various phases of the project. Additionally

A Preliminary Report has been prepared and a detailed drainage and erosion mitigation plan will be prepared and submitted to the County Engineer for approval during the design and development stages. The Applicant proposes to provide major drainage improvements in connection with development of the property. Multiple detention ponds are being proposed for the property, catch basins, drainage pipes and culverts to be utilized for directing run off to major drainage areas on the property are also being proposed.

The EIS submitted for review and comments states that the proposed drainage system for the project will be designed to minimize impacts to the near shore coastal waters. Additionally, water quality treatment and detention basins will be built to prevent runoff and sedimentation from impacting groundwater resources. The Applicant proposes to use BMPs to maintain storm and surface-water runoff and that the BMPs will be designed to prevent violations of State water quality standards.

Comments:

DAR recommends BMPs be implemented during all phases of project development to assure minimizing/eliminating negative impacts resulting from construction debris, petroleum products and/or other toxic pollutants entering into the nearby bodies of water as a result of run-off.

DAR also recommends maintaining public access in and out of the Waikaea Fishing Area so that the fishing public continues to have access to resources in the fishing area.

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plans, DAR requests the opportunity to review and comment on those changes.

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Roy Hardy
Commission on Water Resource Management
PO Box 621
Honolulu, Hi 96809

We are pleased to respond to your May 19, 2014 on HoKua Place as follows:

Page 1, Item 1: The Developer currently is in negotiations with the Kauai Department of Water (DOW) to include HoKua Place proposed water well in the DOW water system. The testing of the proposed well concluded that the well is anticipated to generate more water than the need for HoKua Place.

Page 1, Item 3: Contact by the Developer has been made with HDOA to coordinate the reclassification of agricultural zoned land and redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan.

Page 1, Item 4: The Developer is committed to incorporate water efficient fixtures and practices in this development to reduce the consumption of water.

Page 1, Item 5: The project does include Best Management Practices (BMP) for storm water management to minimize the impact of the project's existing area hydrology while maintaining on-site infiltration and polluted runoff from storm events.

Page 1, Item 6: The Developer is committed to using stored storm water for an alternate source of irrigation.

Page 2, Item 8: Landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii will be incorporated in the irrigation system as deemed practical.

Page 2, Item 9: The Developer will be coordinating with the State Health Department on issues of ground and surface water measures to minimize surface water degradation and/or contamination.

Page 2, Item 11: It is the intent of the Developer to secure a Well Construction Permit before well construction begins.

Page 2, Item 12: The Developer will secure a Pump Installation Permit before any ground water is used for HoKua Place.

Page 2, Item 13: Should any well on or adjacent to this project be abandoned, a permit for abandonment will be secured by the Developer.

Page 2, Other: The Developer will coordinate with Kauai DOW to incorporate this project into the County water use and development plan.

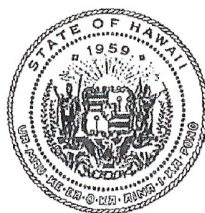
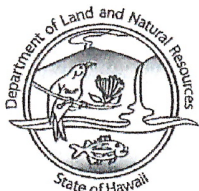
This project will be incorporate recommendations by the Handbook for Storm Water Reclamation and Reuse Best Management Practices in Hawaii (2008).

The Developer intends to use water efficient fixtures and water conservation measures throughout the project.

Respectfully Submitted,

Ron Agor, Architect

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

May 19, 2014

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources
- ☒ Div. of Boating & Ocean Recreation
- ☒ Engineering Division
- ☒ Div. of Forestry & Wildlife
- ☒ Div. of State Parks
- ☒ Commission on Water Resource Management
- ☒ Office of Conservation & Coastal Lands
- ☒ Land Division – Kauai District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Impact Statement (DEIS) for the HoKua Place project (formerly referred to as Kapa'a Highlands)

LOCATION:

"Situated at (4) 4-3-003:001 (portion) in the Kawaihau District on the island of Kauai"

APPLICANT:

HG Kauai Joint Venture, by its consultant, Ho'okuleana LLC

Transmitted for your review and comment on the above-referenced document. We would appreciate your comments on this document which can be found here:

1. Go to: <https://sp01.ld.dlnr.hawaii.gov/LD>
2. Login: Username: LD\Visitor Password: Opa\$\$word0 (first and last characters are zeros)
3. Click on: Requests for Comments. Click on the subject file "Draft Environmental Impact Statement (DEIS) for the HoKua Place project (formerly referred to as Kapa'a Highlands)", then click on "Files" and "Download a copy". (Any issues accessing the document should be directed to Jonathan Real, Applications/Systems Analyst at 587-0427 or Jonathan.C.Real@hawaii.gov)

Please submit any comments by June 17, 2015. If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

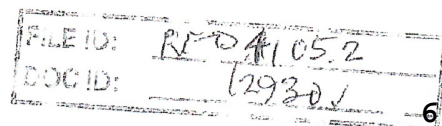
Attachments

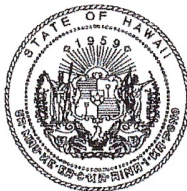
- () We have no objections.
- () We have no comments.
- (x) Comments are attached.

Signed: /s/ W. Roy Hardy

Print Name: Acting Deputy Director

Date: June 3, 2015





STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

June 3, 2015

REF: RFD.4105.2

TO: Russell Tsuji, Administrator
Land Division

FROM: W. Roy Hardy, Acting Deputy Director
Commission on Water Resource Management

SUBJECT: Hokua Place Project (formerly Kapaa Highlands)

FILE NO.:

TMK NO.: (4) 4-3-003:001 (portion)

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://www.hawaii.gov/dlnr/cwrn>.

Our comments related to water resources are checked off below.

- ☒ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☒ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☒ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense/>.
- ☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.
- ☒ 6. We recommend the use of alternative water sources, wherever practicable.
- ☐ 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>

- ☒ 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf
- ☒ 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Permits required by CWRM:

Additional information and forms are available at http://hawaii.gov/dlnr/cwrm/info_permits.htm.

- ☐ 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- ☒ 11. A Well Construction Permit(s) is (are) required before any well construction work begins.
- ☒ 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- ☒ 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- ☐ 14. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.
- ☐ 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.
- ☐ 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- ☐ 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- ☒ OTHER:
The State Water Code requires each county to update its water use and development plans as necessary to maintain consistency with its zoning and land use policies (§174C-31 HRS). Should a change in zoning be approved for this project, please coordinate with the respective Planning Department and/or Department of Water to incorporate this project into the county water use and development plan. An update of the County of Kauai's Water Use and Development Plan is being initiated by the Department of Water.

The project is located in the Anahola Aquifer System Area (ASYA). The sustainable yield of the Anahola ASYA is 17 million gallons per day (mgd). Reported pumpage as of December 2014 is 2.33 mgd. The projected average water demand associated with this project, 0.451 mgd, was based on the Domestic Consumption Guidelines in the County Water System Standards.

Due to the location of this project makai of the UIC, the establishment of an onsite wastewater reclamation and reuse facility and the installation of a dual water system should be considered. Recycled non-potable water and stormwater capture and reuse may be used to meet the irrigation needs of the development, while conserving our natural supplies of ground water for environmental needs. The Commission has published a Handbook for Stormwater Reclamation and Reuse Best Management Practices in Hawaii (2008). Please visit the Commission's website at <http://hawaii.gov/dlnr/cwrm> to view or download a copy.

The Commission strongly supports the proposed installation of water efficient fixtures and water conservation measures. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense/products/index.html>.

If there are any questions, please contact Lenore Ohye of the Planning Branch at 587-0218 or Ryan Imata of the Regulation Branch at 587-0225.

AGOR JEHN ARCHITECTS, LLC
460 Ena Road, Suite 303
Honolulu, Hi 96815
ron@agorjehnarch.com
808-947-2467

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Leo R. Asuncion, Director
Office of Planning
State of Hawaii
PO Box 2359
Honolulu, Hi 96804

We are pleased to respond to your June 15, 2015 comments on the DEIS for HoKua Place as follows:

Page 1, Item 1: An effort has been made to replace some of the maps that had poor resolution.

Page 1, Item 2: The Second Page (392) of Exhibit "L" in Volume I is SHPD's letter of approval of the Archaeology Assessment.

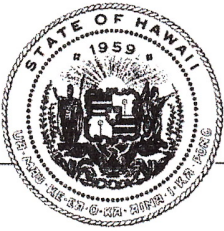
Page 1, Item 3: -An updated LSB map is included in Exhibit "C", Page 54.
-An updated ALISH map is included in Exhibit "C", Page 55.
-We attempted to get a better image of the Soils Map, Page 43, Exhibit "C". Pages 44 to 50 appears to depict the soils type of the property.
-Please refer to Soils Maps 74 and 75 of Volume I for better maps. Pages 76 to 78 of Volume I describes the soils type.

Page 1, Item 4: To the best of our knowledge the HoKua Place petition meets HRS 205-17 and the project is outside the Coastal Zone Management Area.

Page 2, Item 5: An Invertebrate Study is attached as Exhibit "P".

Respectfully Submitted,

Ron Agor, Architect



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

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

Mr. Peter T. Young
June 15, 2015
Page 2

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,

A handwritten signature in black ink, appearing to read 'Leo R. Asuncion', with a stylized flourish at the end.

Leo R. Asuncion
Acting Director

c: Land Use Commission

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Marie Williams, Planner
Planning Director Michael Dahilig
4444 Rice Street, Suite A-473
Lihue, Hi 96766

We are pleased to respond to your comments on the DEIS for HoKua Place as follows:

Page 2, Paragraph 5: Page 11 of the FEIS addresses your comment that the General Plan should not be construed as a desired growth policy. Basically, while the General Plan does not specify the “desired growth in number”, it most certainly addresses “growth policy.”

Page 3, Paragraph 1: Page 22 of the FEIS acknowledges the General Plan Update.

Page 3, Community Plan Consistency: Change to only reference to the General Plan and the Kapa’a-Wailua Development Plan.

Page 3-4, Consistency with Recent Plans and Policy Initiatives: Although the petition is focused on what the LUC’s task is, which is a Boundary Amendment per the current General Plan, the Developer acknowledges that a General Plan Update is in progress. (Page 22). Furthermore, the Developer desires to be flexible in the design of the site at this time so planning during the county entitlement process can take place with the implementation of the “Complete Streets”, Multi-Model Land Transportation Plan, and the Smart Code. The Developer recognizes that the “Form-Based Code” is part of the General Plan update. Page 22 outlines efforts to shift vehicle trip mode to pedestrian, bicycle and transit trips.

Other Comments:

- Exhibit H has the updated TIAR and responses to DPW and DOT comments.
- Pages 19 and 20 elaborates more on the Kapa’a Town Park and the Kapa’a By Pass.
- Page 21 clarifies “reserved areas” as “zoned” areas.
- Page 24 elaborates on “Social Sustainability”.

Respectfully Submitted,

Ron Agor, Architect

Bernard P. Carvalho, Jr.
Mayor



Michael A. Dahilig
Director of Planning

Nadine K. Nakamura
Managing Director

Ka'āina S. Hull
Deputy Director of Planning

PLANNING DEPARTMENT
County of Kaua'i, State of Hawai'i
4444 Rice Street, Suite A-473, Līhu'e, Hawai'i 96766
TEL (808) 241-4050 FAX (808) 241-6699

JUN 18 2015

Mr. Peter T. Young
Hookuleana LLC
1539 Kanapuu Drive
Kailua, Hawai'i 96734

**RE: A11-791 HG Kaua'i Joint Venture
Kapa'a Highlands II
Comments on the Draft Environmental Impact Statement (DEIS)**

Dear Mr. Young:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the State Land Use District Boundary Amendment Petition to the State Land Use Commission for HoKua Place (HG Kaua'i Joint Venture, LLC) which is located on a portion of TMK (4) 4-3-003:001 in the East Kaua'i Planning District.

According to the DEIS, the petition area, named "HoKua Place", is sited on 97 acres located on a bluff mauka of the existing Kapa'a Town Core and adjacent to the Kapa'a Middle School. The area is hemmed by Olohena Road, the Temporary Kapa'a Bypass, and an agricultural subdivision, "HoKua Agriculture Lots." The initial plans show a predominantly residential development characterized by large pockets of single family (86 lots) and multi-family dwelling units (683 units). The County's affordable housing requirements will be fulfilled onsite. The plans include limited space for complementary commercial uses. The public facilities include land for a police/fire station and 14.3 acres of open space, including greenways and a 3.1-acre park. The project area is designated State Land Use District – Agricultural and zoned "Agriculture" by the County.

Based on the DEIS, the Planning Department has the following comments and concerns, primarily in relation to the County's long range plans and land use policy initiatives:

Consistency with the General Plan Update (2000)

Thank you for providing statements addressing how the project conforms to existing County long-range plans. By County Charter, the General Plan guides the future physical development of the County and is adopted by ordinance. The Kaua'i County Code states

that amendments and updates of land use regulations and maps shall be consistent with the policies of the General Plan (Section 7-2.5, Land Use Regulations).

The existing General Plan (2000) identifies the project site for future urban growth under the "Urban Center" designation. This carried over the 1984 General Plan's designation for the area (Urban Mixed Use). The policy for Urban Center-designated land is stated in Section 5.4.1.1 of the General Plan:

"(a) Lands included within the Urban Center designation shall be centers of government, commerce and transportation that serve the entire county or a large region. Uses may include shopping centers, government offices, churches and other institutions, office complexes, and industrial facilities. Residential or resort uses may also be located within the Urban Center designation, where compatible.

(b) Urban Center areas are typically served by wastewater collection and treatment facilities and major roads. Urban Center lands may be zoned for any type of use, including General Commercial, General Industrial, Resort, and Residential."

Since the project map is conceptual at this point, the Planning Department reserves the right to confirm that the project's boundaries are entirely within the "Urban Center" designation before assessing if a General Plan Amendment is required.

Land use policies specific to the Kawaihau District are contained in Section 6.2. This section includes a preliminary planning district vision statement and a discussion on issues and opportunities related to growth and development. Specific to the project site is the following statement (Section 6.2.4.1):

"Lands previously designated for urban use but as yet mostly undeveloped include an area located near Kapa'a, south of Oloheua Road. This area was previously designated for Urban Mixed Use and is shown as Urban Center on the new GP Land Use Map. Owned partly by the State and partly by Amfac/JMB (or its successor), this "expansion area" for Kapaa has already accommodated the Kapa'a Middle School."

It must be considered that in the late 1990s, when the General Plan was developed, a major assumption influencing the final land use map was that the Kapa'a Bypass Road, also known as the Permanent Relief Route, would be completed, thus increasing highway capacity. This critical infrastructure project has stalled and does not appear to be moving forward at the State Department of Transportation (DOT).

Also, while the General Plan identified this area as Urban Center, the plan did not adopt policy that allocated housing units to the area nor identified the desired build-out scenario or intensity of uses. Likewise, the zoning capacity figures in the build-out analysis conducted for the existing General Plan should not be construed as desired growth policy. Please clarify this in the DEIS.

Ongoing General Plan Update Process

In November 2014, the Planning Department launched the General Plan Update, contracted to SSFM International. The project is envisioned to last two years and will

utilize extensive public input and new data to amend the existing General Plan's vision, policies and maps.

In May 2015, the public process for the General Plan Update was initiated with multiple Island-wide events and meetings. The planning department received a large number of comments related to traffic congestion throughout the Kapa'a-Wailua corridor and the desire to limit future growth until vehicular level-of-service improves. The applicant should be aware that these public comments, along with other public concerns, will factor into the discussion regarding potential General Plan land use map amendments. The FEIS should acknowledge that the General Plan Update is underway and could result in General Plan land use map amendments.

In Section 4.8, Socioeconomic Conditions & Public Service Facilities, please utilize information from the General Plan Technical Study: Socioeconomic Analysis and Forecast (2013) in the discussion of population growth and housing demand. This technical study was prepared for the ongoing General Plan Update and provides regional population and housing allocation forecasts for all six planning districts, including the East Kaua'i Planning District. It is a foundation study for the ongoing General Plan Update process and will be utilized in General Plan policy discussions related to growth and land use map amendments.

Community Plan Consistency

In several places, the DEIS incorrectly states that HoKua Place is consistent with the Kapa'a Town Development Plan and the Kapa'a-Wailua Basin Community Plan.

The existing development plan for the area, the Kapa'a-Wailua Development Plan, focuses on the Kapa'a Town Core and does not address regional growth nor touch on future plans for the project area. Despite the age of the plan, which was adopted in the 1970s, this is the correct plan to reference when addressing consistency with the regional plan.

The Planning Department has been working on an update of the Kapa'a-Wailua Development Plan (also known as the East Kaua'i Community Plan) for several years. This plan is not yet in public draft form and cannot be considered when addressing consistency with the project area's regional plan. However, it would be appropriate to mention that the planning process is ongoing. Unfortunately, the Planning Department cannot provide a clear timeline for project completion as the project's status is under review by County Administration.

There is no existing or draft Kapa'a Town Development Plan. A Kapa'a Town Urban Design Plan was submitted as part of the Mayor's Annual Budget Submittal to Council (FY2015-16), but it was not included in the final annual budget. Please exclude mention of this plan from the Final Environmental Impact Statement.

Consistency with recent plans and policy initiatives

Complete Streets (2010) and Complete Streets Subdivision Ordinance (2013)

The County's Complete Streets Policy requires that new projects safely accommodate travel by pedestrians, bicyclists, public transit, and motorized vehicles. Therefore, we appreciate the inclusion of active transportation design in the initial project concepts and the

acknowledgement of the positive health impacts when such infrastructure is carefully integrated into community design. However, the conceptual plans in the DEIS do not appear to reflect a recent amendment to the subdivision code which requires short block lengths in the Residential District. Please review Ordinance 946, as said standards have the potential to significantly alter the project layout.

Multi-Modal Land Transportation Plan (2013)

The Kaua'i Multimodal Land Transportation Plan (MMLTP), approved by Council in 2013, sets a goal of flatlining total annual vehicle miles travelled via trip mode shifts to active transportation modes, such as walking, biking and transit. For this to occur, the walkability of towns and urban centers must improve which will require stronger linkages between land use and travel modes. The FEIS should acknowledge this goal and address how the project will support vehicular trip mode shift to pedestrian, bicycle and transit trips.

Smart Code (Form-Based Code)

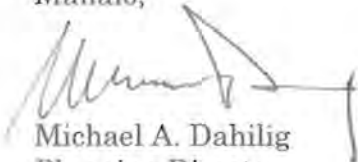
The Sustainability Plan for HoKua Place refers to "Smart Code" and states that the conceptual plans implement Smart Code principles. The County is currently implementing Smart Code's transect-based (or place-based) zoning, also known as Form-Based Code, via two community plans. As shown in the DEIS, the project would create a community segregated into two building types: the single-family house and the multi-family apartment complex. Form-Based Code supports a seamless mix of building types to meet diverse housing needs at a range of price points. This mix includes the "missing middle" building types that provide medium-scale, higher density housing such as the duplex, carriage house, mansion apartment, and cottage court. This zoning approach is codified in the Draft South Kaua'i Community Plan and is supported in the Draft Līhu'e Community Plan. Please be aware that the General Plan Update will explore how an Island-wide approach to form-based code could be implemented.

Other Comments:

- In regards to the TIAR and recommendations for the design of the proposed new connector road from the Temporary Bypass Road to Olohena Road, please address comments from the Department of Public Works.
- On Page 18, Paragraph 1, a description of Kapa'a Town Park is used but it reflects the vision for the facility and is not an accurate description of the existing facility. Likewise, Paragraph 2 on the same page reflects a vision statement for the Bypass Road and does not illustrate current conditions.
- Section 2.2, Page 19, states that the project will address housing needs "without significantly affecting reserve areas for foreseeable urban growth". Please clarify the meaning of this statement, including what is meant by "reserve areas for foreseeable future growth."
- Page 21, please clarify the meaning of "social sustainability."

Should you have any questions, please contact Marie Williams, Planner, at (808) 241-4050.

Mahalo,



Michael A. Dahilig
Planning Director

CC: Jodi Higuchi, Office of the County Attorney
State Land Use Commission

Date: 11-06-2017

RE: Response to Comments on HoKua Place DEIS

TO: Rayne Regush
Chairperson of W-KNA

We are pleased to respond to W-KNA's comments on the DEIS for HoKua Place as follows:

Page 1:

It is highly unlikely that the developer would commit to install any infrastructure (Road A) prior to approval of a Boundary Amendment or achieving of entitlements on the County level. The completion of the any infrastructure will most likely be a condition of entitlements at the state and county levels..

Page 1, Item 1:

Please refer to above response.

Page 1, Item 2:

The LUC most certainly will assess the project's financial plan during the entitlement process. Because of the rigorous process and enormous cost processing of entitlements, innately , the property's market value will increase proportionately.

Page 1, Traffic Circulation and Congestion:

Again, an update TIAR is included in the FEIS along with the State DOT and the County DPW comments, as well as the consultant's response to the comments. (See Exhibit "H", Volume II) The consultant and applicant believe that while the regional traffic is congested at times, HoKua traffic plan will help ease the traffic congestion in the area.

Page 2:

- a) Refer to the updated TIAR with the State DOT and the County DPW comments, as well as the consultant's response are included as Exhibit "H", Volume II.
- b) Please refer to the updated TIAR.
- c) The updated TIAR discusses solutions to the intersection of "Road A" and Olohena Road intersection.
- d) Currently there is no planned overpass over the bypass road.
- e), f), & g): The updated TIAR herein discusses these items.

Page 2 Density:

- a) This petition entails the proposal of 683 multi-family units and 86 single family lots and homes.
- b) This petition includes 683 multi-family units and 86 single family lots Alternative 3 is depicted as not an option to fulfill the housing needs as expressed by the planning department at the inception of HoKua Place. At that time the county planning department asked for 700

to 800 units. Alternative 3 would yield a maximum approximate of 300 single family units, far short of the planned total units and will not effectively meet the current General Plan's demand for housing in the area.

- c) HoKua Place is committed to providing affordable housing in accordance with the Kaua'i Housing Code. Please refer to Page 12 of the FEIS, Volume I.
- d) The applicant recognizes that challenges of the sloped lands where some of the multi-family units are proposed. The final designs will accomplish the most effective use and will minimize the cost of construction on sloped lands. Detailing of housing units and multi-family units will be disclosed during the entitlement process with the County Planning Department and Planning Commission.

Page 2 Phasing:

- a) The HoKua Farm Lots will be developed separately from Hokua Place. The Farm Lots are zoned for their proposal. Hokua Place is petitioning for a Boundary Amendment.

Page 2, DEIS Maps:

- a) This petition is not intended to show details of the housing units. The map on Page 22 depicts the greenbelts, neighborhood commercial space, public pool facility space and the proposed areas for multi-family designations and single family designations.

Although this petition is based on the current General Plan, the applicant recognizes that the County Planning Department has submitted an update to the Kapa'a-Wailua Development Plan to the Kauai County Council for approval. Currently, there is no foreseeable timeline as to when the updated plan will be approved or rejected by the council. However, the applicant is cognizant of the "Form Base Code" that planning department is emphasizing in the updated plan. Therefore, to allow for flexibility to design for the "Form Base Code" particulars, the applicant is submitting this petition for a total amount of units that is plausible for the site and not committed to the final site planning of the units.

The blue-line indicates the current general plan "Urban" designation boundaries as indicated on the map.

- b) The detailed planning of the housing units will be developed for the entitlement process for the County Planning Commission. W-KNA will have opportunities to scrutinize the plan during that process.
- c) Please refer to Exhibit P.1 for a full size aerial topography map.
- d) Refer to Exhibit P.2 for a full size survey showing dirt roads etc.
- e) An updated Firm Map is provided in the FEIS, Volume I.

Page 3, Stream Impacts:

- a) The "unnamed" stream is outside of the HoKua Place Development and it does come from Oloheua Road and ultimately crosses the bypass road. The stream then goes to Waikaea Canal. The development of Hokua Place will include on site retention basins which will not allow development run-off into the stream. A more detailed development drainage plan will be provided for the County entitlement process. It will include a drainage plan that will safeguard the stream from negative impacts.
- b) Item a) above address this item.
- c) The exploratory hole for propose water well is located approximately 175 feet from the stream. The spring shown on the subject map is outside the boundaries of Hokua Place, but is approximately 180 feet away from the stream.

Page 3, Inconsistent Information:

- a) To the best of my knowledge, all information provided for the DEIS is pertinent to the project and the FEIS.
- b) The provided Exhibit “P” delineates an aerial topography which clearly shows the sloped areas.
- c) A licensed Archaeologist will make the determination of “significance” if there are findings during construction.
- d) HoKua Place is in concert with the current General Plan and the Kapa’a-Wailua Development Plan (East Kauai Community Plan).

Page 3, Drainage:

- a) & b) The applicant believes that the Preliminary Drainage Engineering Report on Drainage improvements is adequate for this FIES petition. The applicant will follow the normal procedure of providing a complete and detailed report of drainage during the County permitting process.

Page 4, Visual and Aesthetic Resources:

- a) The Nounou Mountain Range is to the North East of the Middle School. Mount Waialeale is to the North and partly North West of the Middle School. The average difference in grade from the school to potential building areas adjacent to the school is 25 feet in both directions. Therefore, the applicant can visualize that views of the subject mountain ranges will not be significantly impaired.
- b) Most of the proposed units will have substantial views of either the ocean or mountains. To avoid having more traffic than the projected residential traffic in the area, the applicant is reserved about creating a public viewing area for tourists and the like.
- c), d), e) and f): The photographs have been replaced with your recommended photographs. Exhibit P.1 for a full size survey showing dirt roads etc.
- g) and h): The developer is committed to providing “affordable housing”. The cost for underground utilities could cost each unit owner 25k to 30k each. The option of not going underground should rest with the developer in order to achieve their commitment to “affordable housing”.

Page 4, Secondary and Cumulative Impacts:

- a) The FEIS has addressed the current General Plan and has recognized the updated Kapa’a-Wailua Development Plan. Refer to Page 22.
- b) The projected property taxes generated from this affordable housing project is a minimum of approximately 1.5 million dollars a year. There is no forecast of a plan to take care of the regional traffic system, therefore a statement of generated taxes versus cost of future solutions is not available at this time.

Police and Fire protection is already available for the proposed development area.

- Page 6, c) It is the Developer’s assessment that the tourist population increase from the Coconut Beach Resort, the Coconut Plantation Village and the Coco Palms will have a positive impact on the HoKua Place. The subject resorts will provide hundreds of jobs for the local residences of this development. The housing of many of our young local residences and the jobs provided by the afore mentioned resorts, in short vicinity of each other, cumulates what should be achieved in building a sustainable community.

Page 6, d) The population census graphics for the 2010 remains the same to 2017 (10,699). Therefore the submitted report can still apply as written.

Page 6, a) Volume 2 has been paginated.

Respectfully Submitted,

Ron Agor, Architect



WAILUA - KAPA'A
NEIGHBORHOOD
ASSOCIATION

June 22, 2015

Daniel E. Orodener
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.

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- 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 rendering 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 not 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 Hokuia Place and empties into the Waikaea Canal. The Google Earth picture we inserted here identifies Waikaea Stream with a blue line.



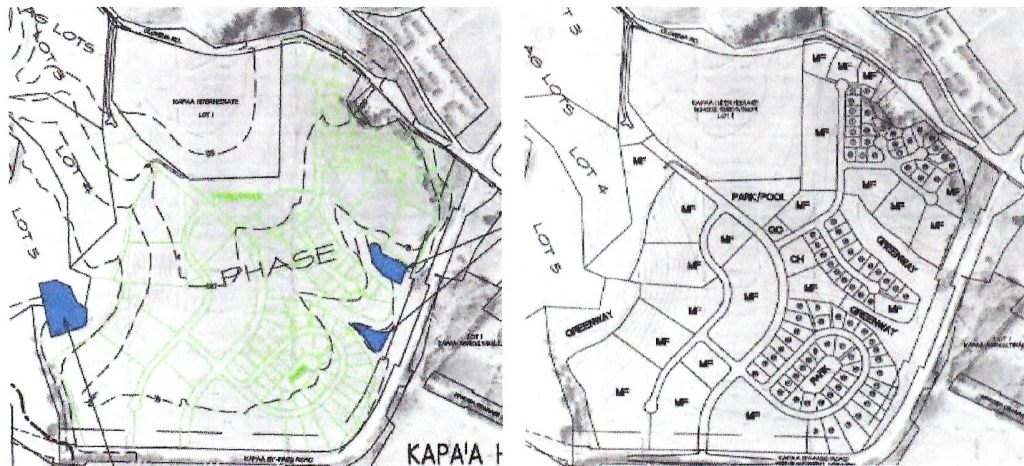
- b) On page 77, the DEIS says: “HoKua Place is committed to keeping the flow of the stream consistent”. Therefore, please include base flow information for this stream.
- c) Provide the distance between the location of the Potable Well and the Stream, and to the Spring identified on page 86 on the map.

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.



Visual and Aesthetic Resources.

- 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.
- 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.
- 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.
- 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.



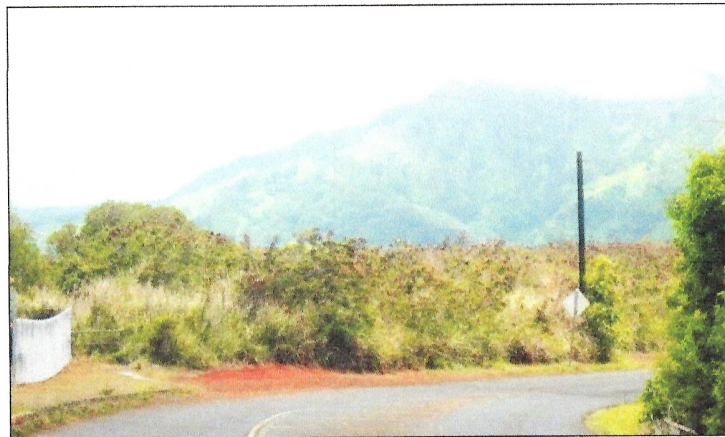
The downhill slopes below the Middle School campus will be populated with new urban district housing, replacing the existing agricultural vistas.

- 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).



**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 Lihue.**

- 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 Cumulative 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.

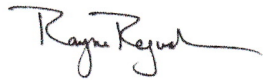
- c) Cumulative impacts relate to HoKua Place in the context of two large resort developments approved just a few miles away – Coconut Beach Resort (343 units) and Coconut Plantation Village (198 units) along with pending permit approvals for the Coco Palms Resort's 350-unit hotel. Please discuss the 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