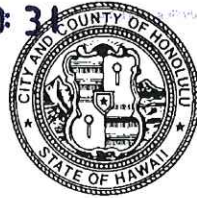


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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LAND USE COMMISSION
STATE OF HAWAII

KIRK CALDWELL
MAYOR

2018 APR 27 A 10:31



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DR18-61
2018/GEN-7 (ry)

April 24, 2018

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

Dear Mr. Orodener:

SUBJECT: DR18-61 Petition for Declaratory Ruling to Designate
Important Agricultural Lands (IAL) in Kunia, Central Oahu
Tax Map Keys: 9-2-004: 006 (por.), 011, and 012 (por.)

We have reviewed the subject petition submitted by Hartung Brothers Hawaii, LLC (Hartung), and have no objections to the Petition proposing to designate approximately 462.967 acres of land in Kunia as IAL (hereinafter referred to as the "Property"). However, the Department of Planning and Permitting (DPP) would prefer the designation include 91.345 acres (Tax Map Keys: 9-2-004: 003 and 006 (por.)) of Hartung's proposed excluded lands along Kunia Road. While Hartung's agricultural processing facilities and offices are on a small area of Tax Map Key: 9-2-004: 003, the remainder of this parcel and the 72.049 acre portion of Tax Map Key: 9-2-004: 006 are considered some of the very best lands for commercial agricultural operations to date. If not, this proposal along with the Land Use Commission's (LUC) approval of Monsanto Company's petition for Declaratory Ruling (Docket No. DR17-59), will result in a rather large land area in Kunia being excluded from IAL designation. Accordingly, we offer the following comments:

1. Hartung's property is zoned AG-1 Restricted Agricultural District and located outside of the City's Ewa Development Plan (EDP) and Central Oahu Sustainable Communities Plans' (COSCP) Community Growth Boundaries.
2. Petitioner's proposed designation of IAL land in Kunia is consistent with the objectives and policies of the City's General Plan intended to maintain the viability of agriculture on Oahu. Furthermore, the Petition is consistent with the City's long-range vision, policies, principles, and guidelines of the EDP and COSCP intended to protect open space and prime agricultural land in the Ewa and Central Oahu regional planning districts.

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3. The DPP is finalizing its proposed IAL map. Under the public review version of the IAL map and the final map now being prepared, all of Hartung's 848.627 acres in Kunia meet the IAL Mapping Project Technical Advisory Committee's three top criteria for designating land as IAL: a) water availability; b) soil qualities; and c) agricultural production. Therefore, all of Hartung's lands in Kunia are proposed for inclusion in the DPP's final map.
4. The DPP continues to support the inclusion of all qualifying lands in the Kunia area, including lands owned by Hartung, for IAL designation. Hartung's lands are mostly large, gently sloping parcels, with minimal gully interruptions. They meet all of the three top IAL criteria used in the study for IAL designation, and constitute a major share of land in the Kunia area, some of which exhibited the highest levels of sugar cane production during Oahu's past plantation era.
5. Accordingly, the DPP strongly supports the inclusion of 91.345 acres of Hartung's land along Kunia Road for inclusion as IAL. This would form a major portion of IAL designated lands in Kunia should its inclusion as proposed in the City's IAL Mapping Project, be approved by the City Council and ultimately by the LUC. We have no objections to the proposed exclusion of the remaining 295.66 acres of Hartung's lands to the west, Tax Map Key Nos.: 9-2-004: 006 (por.) and 012 (por.). These mauka lands to the west are much less suitable for production agriculture because the land is: 1) steeper; 2) more prone to erosion; 3) furthest from the processing facility; and 4) not evenly supplied with functional irrigation infrastructure; and 5) more prone to pests due to the proximity of the Honouliuli Forest Reserves and unmanaged or minimally-managed properties bordering these fields.

In summary, we have no objections to the Petition for designation of approximately 462.967 acres of land, consisting of Tax Map Key: 9-2-004: 011 and portions of Tax Map Keys 9-2-004: 006 and 012, as IAL. However, with respect to the remaining approximately 385.66 acres proposed by the Petitioner for exclusion from IAL designation, we recommend that the 91.345 acres of land along Kunia Road, consisting of Tax Map Keys: 9-2-004: 003 and 006 (por.), be retained for future IAL designation as proposed by the City's IAL Mapping Project.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Raymond Young at 768-8049 or Franz Kraitz at 768-8046.

Very truly yours,



FOR Kathy K. Sokugawa
Acting Director

KKS:ah

cc: Corporation Counsel
Danton S. Wong, Chun Kerr LLP