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DTS 201812141410MA

December 21, 2018

TO: Daniel Orodener, Executive Officer
State Land Use Commission

FROM: Leo R. Asuncion, Director
Office of Planning

SUBJECT: HoKua Place, Draft Environmental Impact Statement (2nd DEIS)
Petitioner: HG Kauai Joint Venture LLC
Location: Kawaihau District, Wailua, Kauai
Acreage: Approximately 97 Acres
Tax Map Key: (4) 4-3-003: 001 Portion

2018 DEC 21 P 2:13

Petitioner proposes to establish HoKua Place, a residential development, which will be comprised of approximately 683-multi-family units and 86 single-family lots and homes, HoKua Farm lots, infrastructure, open space, a 3.1 acre park, and 1.4 acre commercial area.

A Draft Environmental Impact Statement (DEIS) was first published in May 2015. According to the document, due to the passage of time and other events, including the preparation of additional reports, Petitioner prepared a revised draft Environmental Impact Statement ("2nd DEIS"). New studies include an agricultural suitability report, an updated Traffic Impact Assessment Report (TIAR), an invertebrate study, and information on the updated Kauai General Plan.

The Office of Planning (OP) has reviewed the 2nd DEIS and has the following comments.

1. OP submitted comments on the first DEIS in a letter dated June 15, 2015. We note that the 2nd DEIS appears to address our comments.
2. Page 12-13, Tables Kapaa Highlands Product Sales Price Projection and Kapaa Highlands Product Closing Projection.
 - a. All references made to the old defunct project name of Kappa Highlands should be revised to reflect the new name of HoKua Place. It is confusing to see tables and charts with the old name and difficult to determine whether the information is current to the new project.
 - b. The sales projections table, titled Kapaa Highlands Product Closing Projection, indicates that sales would begin about 2019 to 2020, and complete sales about 2026. We note that this is only a six-year period of time, which appears optimistic for the construction and sales of 683-multi-family units and 86 single-family lots.
 - c. The market study was completed in 2014 and should be updated for the Petition.

Mr. Daniel Orodener
December 21, 2018
Page 2

3. Exhibit O. Kauai County Planning Commission Tentative Subdivision Approval for HoKua Farm Lots June 19, 2014. We understand that the farm lots are not a part of the Petition Area, however, this Exhibit O is not legible. This Exhibit should be re-done prior to finalizing the EIS document.
4. Page 16. 1.5 Development Status and Implementation Schedule. We note that the 2nd DEIS document indicates that the proposed project will be completed within 10 years from the Land Use Commission approval.
5. Pages 32-46 Archaeological and Historic Resources and 47-54, Cultural Resources. While the 2nd DEIS includes a description of Archaeological and Historic Resources, and Cultural Resources, there is no Ka Paakai analysis. The Ka Paakai analysis is an important finding that is required of the Land Use Commission in determining whether to approve lands to be reclassified, thus, this Ka Paakai discussion should be included in the 2nd DEIS.

Thank you for the opportunity to review this 2nd DEIS. If you have any questions, please call Lorene Maki of our Land Use Division at (808) 587-2888.

Sincerely,



Leo R. Asuncion
Director