

**From:** [Ann Perry](#)  
**To:** [DBEDT LUC](#)  
**Subject:** Hokua Place Proposed Up-zoning of Lands From Agricultural to Urban Center  
**Date:** Monday, December 24, 2018 12:39:50 PM

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**TO:** State of Hawaii Land Use Commission  
**RE:** Hokua Place Proposed Up-zoning of Lands From Agricultural to Urban Center  
**DATE:** December 24, 2018

The Hokua Place 2<sup>nd</sup> Draft Environmental Impact Statement (DEIS) does not provide sufficient justification to warrant the up-zoning of 97 acres of agricultural lands behind Kapa'a Middle School from State agricultural lands to urban center. As such, I am recommending the Land Use Commission support Alternative 1 in the DEIS – the No Action Alternative. Under this alternative, no action will be taken and the Project area would be left in its current state. Hokua Place would not be built. The land would remain in the State Lands Use Agricultural District. The “no action” alternative would be consistent with the sentiments of the community and the rationale as described below.

**FURTHER CONTRIBUTING TO UNTENABLE TRAFFIC IN KAPA'A.** By their estimates, Hokua Place will actually add another estimated 1,000-1,900 vehicles per hour (AM plus PM) to Kuhio Hwy and the By-Pass Road, further miring us in perpetual gridlock. If that isn't enough, imagine Kuhio Highway when 2000 cars are added to the Kapa'a logjam by two already approved resorts ready to go up in the Wailua-Kapa'a corridor (Coconut Beach Resort and Coconut Plantation = 527 units), an one pending residential development (Kealia Mauka).

**IMPACTS ON AN AGING INFRASTRUCTURE.** Hokua Place wants to hook up to the Wailua waste water treatment plant. Yes, Wailua has the capacity, but the infrastructure for the treatment plant is old, outdated and malfunctioning. In fact, the County Council is now considering funding to update the Wailua facility, even though it is in a flood zone and will be highly susceptible to sea level rise as shown by the State's new SLR Report. And remember, this is just one of 3 new developments coming online

on the east side which will be putting demands on infrastructure.

PROJECT PROPOSED UNDER THE GUISE OF MUCH NEEDED AFFORDABLE HOUSING. What is missing from the housing mix on Kaua'i is affordable housing - low and middle income housing. Hokua Place developers want to add 769 residential units to the mix with a price point starting at \$650K, with the qualifier that these prices are subject to change. If affordable housing means that the cost of housing is no more than 30% of the total household income, then \$650K is beyond the reach of low and middle income families, even when many of these individuals have multiple jobs just to make ends meet. The net effect is we are continuing to build houses primarily for mainlanders and foreigners (constituting approximately 41% of residential sales), increasing our population and further stressing our limited road system and infrastructure.

I urge you not to support the up-zoning of the 97 acres of agricultural lands behind Kapa'a Middle School from State agricultural lands to urban center, the project known as Hokua Place.

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