

From: [Gabriela Taylor](#)
To: [DBEDT LUC](#)
Subject: Honua Place Subdivision Comments
Date: Wednesday, December 19, 2018 10:30:02 AM

To: The Hawaii state Land Use Commission
Re: Hokua Place Subdivision: Comments: 2nd Draft Impact Statement
From: Gabriela Taylor, Kapaa, Kauai

Commissioners:

I am recommending Alternative 1 – the No Action Alternative from the 2nd Draft Environmental Impact Statement. 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. Here are the reasons.

Since 2004, residents on the east side of Kaua’i have been under the threat of yet another development with 769 residential units, at a price range beyond the reach of most residents, which in its current iteration is called Hokua Place. This, of course, is along with two resorts already approved and soon to be under development in the Wailua-Kapa’ a corridor (Coconut Beach Resort and Coconut Plantation = 527 units), a pending resort redevelopment (Coco Palms), and a residential development on the north end of Kapa’ a (Kealia Mauka). The residents of the east side, and those driving through, want to know when is enough, enough?

Impacts on Our Island From the Proposed Hokua Place Subdivision

1. Stuck In Traffic: Buried in the 2nd Draft Environmental Impact Statement and By Their Own Admission, Hokua Place Will Generate a Total of Approximately 1,900 Vehicle Trips Per Hour During the Morning and Afternoon Rush Hours Combined.

The 2nd DEIS indicates that Hokua Place is expected to generate 487 vehicle trips per hour (vph) and 560 vph during the AM and PM peak hours of traffic, respectively, then buried in the document they qualify that by saying that: “The AM and PM peak hour trip generation characteristics for Hokua Place were increased by about 90+ vph over the DEIS traffic study, primarily due to the use of the average peak hour trip rates for multi-family dwelling units.” So what numbers are we looking at here? By their estimates, Hokua Place will actually add another estimated 1,900 vph (AM plus PM) to Kuhio Hwy and the By-Pass Road, further miring us in perpetual gridlock. If that isn’t disaster enough, imagine Kuhio Highway when 2000 cars are added to the Kapa’ a Crawl by two already approved resorts ready to go up in the Wailua-Kapa’ a corridor. The Kapa’ a Crawl has ballooned over the past year to create major traffic jams on Kuhio Highway, from Wailua River to Kealia and beyond, from 7am to 9pm daily. What more needs to be said about the diminishing quality of life on the Eastside? The only solutions proposed by developers are to: **a)** dedicate the By-Pass Road to the State, of which their property simply crosses, but they don’t own the whole road – in any case it is already fully operational and not noticeably reducing the Kuhio Hwy traffic congestion; **b)** cutting a road between Olohena Road and the By- Pass Road which is a smoke and mirrors approach to reducing traffic, in no way will it reduce congestion as that is not where the problem lies (except during school drop-off and pick-up hours); **c)** and then the rest of the 48 significant improvements are punted to the State or County (see HDOT’s study *Kapa’ a Transportation Solutions*, August 2015).

2. Our Aging and Insufficient Infrastructure: The 987 Additional Units Hokua Place is Adding to the Market Will Only Create Further Impacts on Our Failing Infrastructure. Aging infrastructure reared its ugly head recently when a sewer cap blew up on Kuhio

Highway and a sewage spill contaminated the Wailua River and beach area. Along with the contamination of the river and nearshore reefs, east bound traffic backed up all the to Hanamaulu, creating 2-hour traffic travel time from Lihue to Wailua. A few days later there was an island-wide energy blackout. The landfill is almost full and land purchased at a high cost for a new one. Increased water outages require old water lines and pumps to be frequently upgraded. We know about bumpy potholed county roads, as well as defects in the highway. Adding more cars increases damage to an already poorly maintained network of roads. Data given for Kapa'a Schools capacity is outdated (2010/11), so stating that they are not at capacity is irrelevant until the data reflects the current situation. The fact that County has "several solid waste programs with several other proposals that will likely be implemented by the time this Project is under construction . . ." creates both a dependency on the County to solve the problem of solid waste for Hokua Place, and provides no assurance that sufficient capacity will be in place to handle the additional burden of solid waste.

3. How Can Hokua Place Be Touted As Meeting Our Affordable Housing Needs: Single Family Homes Starting at \$650,000 – Where is the Affordability?

Only 30% of the Hokua Place subdivision condos will be in the affordable category as required by Kaua'i County Ordinance No. 860. *Note: this is important! The projected sales prices in 2nd DEIS quotes prices of multiplex and single family houses comes with the warnings: "Prices are subject to market conditions."* This means that housing prices can increase at the will of the developer. Single family units are priced from \$650,000 to \$950,000. In fact, even the lots (without houses) are projected to be selling in the \$216,000-\$316,000 range (these numbers are in 2015 dollars). Add on the actual building of a house, then these lots clearly exceed the "affordable housing" threshold. However, units that locals can't afford can be purchased by mainlanders and foreigners, further exacerbating our housing shortage.

4. Food Security in a Time of Uncertainty: Conservation of Agriculture Lands Should Be a Priority, Not Urban Sprawl.

We need to grow more food, not houses on that 97 acres. The Draft Environmental Impact Statement indicates that the poor soil cannot support most commercially viable agriculture, yet these lands have a history of being cultivated in sugar cane. Clearly importing 90% of our food to Kaua'i makes us vulnerable when hit by tsunamis, hurricanes, floods and other increased natural disasters frequenting the islands. Climate change further threatens our imported food supply and food security on Kaua'i.

5. Promises, But No Commitments Actually Made: What About Improving the Quality of Life for Residents?

a) Hokua Place promised to provide a public pool for the community, but conveniently forgot to indicate that they will provide the land but the County has to build and maintain the pool – which the County has yet to agree to; **b)** they proposed to develop a "sustainable community" that preserves the rural like character of Kapa'a while meeting a growing housing need – none of these three items have been substantiated by examples in the 2nd Draft Environmental Impact Statement; **c)** they justify the urban center up-zoning request to the Land Use Commission by saying they are building within a 10-minute walk of the Kapa'a core center (compact and walkable is a criteria) when in fact the walk access is dangerous in that there are no sidewalks between Hokua Place and town along some of the busiest streets on the island; **d)** they declare they are "preventing sprawl into Open and Agricultural lands" when in fact they are creating sprawl; **e)** they are proposing an area off of Olohena Road for future police and fire sub-stations yet at no time has this need been identified by the County, especially since a new police station was built around the corner near Baptiste Sports Complex not more than 5-years ago (and it is not clear whether Hokua Place wants to lease this land to the County or gift it).

6. Whose Looking Out For the Environment?: Potential Impacts From Hokua Place on Federally Protected Species.

The following species have been observed in the Project vicinity and listed as threatened or endangered species: Newell's shearwater, Hawaiian petrel, Band-rumped storm petrel, Hawaiian Hoary bat, Hawaiian stilt, Hawaiian goose, Hawaiian moorhen and Hawaiian coot. Of particular concern are impacts to Hawaiian petrel, the Band-rumped storm petrel and Newell's shearwaters that are all known to transit the area and prone to collisions with objects in artificially lit areas. Both during construction of the Project (use of night time lighting for expediency) and after completion (for safety and security), outdoor lighting could pose a threat to these nocturnally flying birds. It is not clear if simply "consulting" with USFWS and the mitigation measures recommended in the 2nd DEIS will lead to the needed and necessary actions to protect these species.

7. Hokua Place and the Myth of a Sustainable Development: Give Us a Model of Sustainability With Some Substance.

The six points laid out above should be a clear indicator that Hokua Place do not resemble the expectations of sustainable development. Their statement in the 2nd DEIS exemplifies how shallow their understanding is of "sustainability: "The management policies will encourage residences to participate in the moral ethics of respecting the surrounding environment. Reduce waste and excessive consumption, and fulfill the responsibility as trustees of the environment for the present and future generations. Residences will be invited to participate in policy and decision making." (2nd DEIS). These are simply platitudes without any substance. This does not set a vey high standard for "sustainability".

Mahalo, Gabriela Taylor, Kapaa