

Derrickson, Scott A

From: rayneregush@aol.com
Sent: Friday, August 02, 2019 11:24 PM
To: DBEDT LUC
Subject: Testimony - FEIS for Kealia Mauka Homesites
Attachments: WKNA-LUC Kealia FEIS Comments AUG2-2019.pdf

Aloha Hawaii State Land Use Commissioners,

Please see the attached testimony from the Wailua-Kapaa Neighborhood Association (W-KNA) regarding the FEIS for Kealia Mauka Homesites.

Mahalo,
Rayne Regush
W-KNA Chair



WAILUA-KAPA'A
NEIGHBORHOOD
ASSOCIATION

August 2, 2019

Hawai'i State Land Use Commission
P. O. Box 2359
Honolulu, HI 96804-2359

[Email: dbedt.luc.web@hawaii.gov]

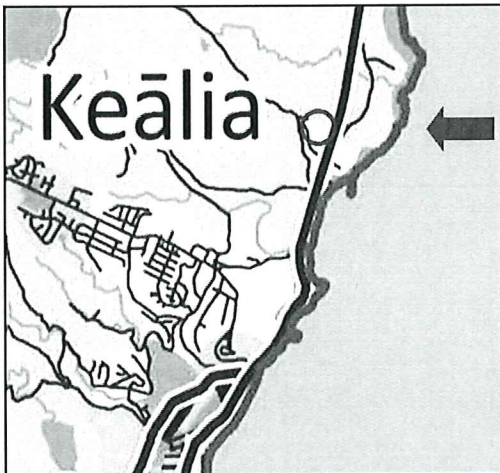
RE: Inadequate FEIS for Kealia Mauka Homesites Residential Subdivision & Petition for District Boundary Amendment for 53.4-acres, TMK (4)4-7-004 por. 001

Aloha Commissioners:

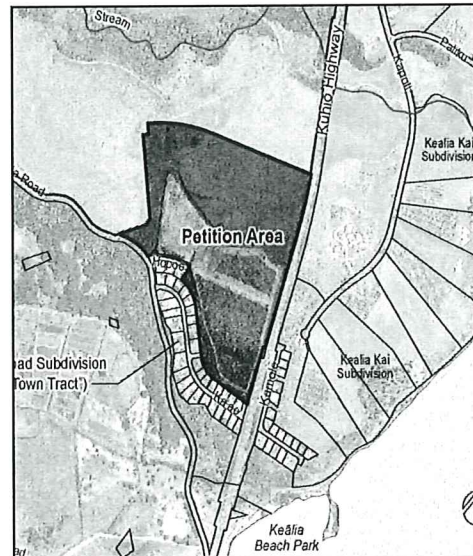
The Wailua-Kapa'a Neighborhood Association (W-KNA) strongly urges that you reject the FEIS. The FEIS contains incomplete information, inaccurate conclusions, and there are significant impacts to Kealia residents and the broader community.

False Representation of Petition Area

First and foremost, the 53.4 acre petition area is far greater in size than the growth boundaries shown for Kealia in the 1982 and the 2018 General Plan Land Use Maps. Details of those maps are presented below -- both show the Kealia area extending eastward towards Kuhio Highway. The distinct boundaries in these General Plans do not encompass land north of Hopoe Road.



Detail from General Plan 2018, Figure 5-1
Kaua'i Land Use Map for East Kaua'i with
Kealia designated as "Residential
Community". [Full map on last page.]

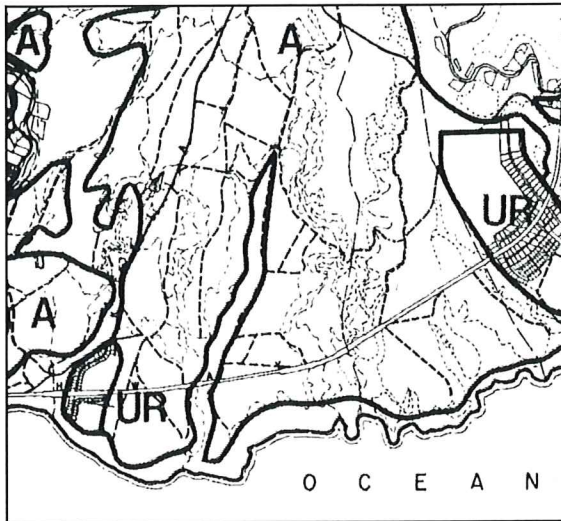


Detail from Project Vicinity Map.

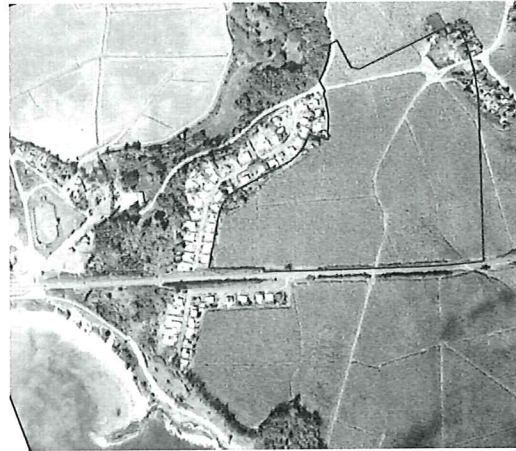
Claims in the FEIS that the 53.4 acres is designated for "Residential Community" use by current and past General Plan is false. The GP land use map boundaries delineate a much smaller portion of "Urban Residential" land -- perhaps only one-third of the 53.4 acre petition area. This significant discrepancy is clearly visible when comparing these illustrations side by side.

Serving Residents of the Kawaihau District
"We treasure our rural community"

340 Aina Uka Street, Kapa'a, Hawai'i 96746 • 821-2837



Detail from 1982 General Plan Kapaa-Wailua Land Use Map. In lower left corner, Kealia is designated Urban Residential (UR). See full map on last page.



1982 area photo detail from Cultural Surveys Hawaii report showing residential homes on Ka'ao & Hōpoe Roads and the proposed petition area which is 3x greater in size than the Urban Residential designation in the 1982 and 2018 Kauai General Plans.

The Project is Inconsistent with Current & Past General Plan Recommendations

The “interpretation” that Kealia was earmarked for greater residential community development in previous General Plans is a misrepresentation as it pertains to this petition area since the 53.4 acres is about 3x the size of the Urban Residential designation in the 1982 and 2018 General Plans.

The 2018 General Plan has no references or narrative about expanding density adjacent to Kealia Town Tract (which is comprised of just 38 homes). The General Plan called for new growth “in and around” the Waipouli-Kapa’a urban center and DHHL lands in Anahola – not in rural Kealia. The Plan clearly states: “Residential expansion in outlying areas designated Agriculture is specifically discouraged.” (Section 6.2.4.2, pages 6-14.)

In addition, during the past decade there was an 8-year effort to produce an *East Kaua’i Development Plan 2030* intended to finally replace the *1972 Kapa’a-Wailua Development Plan*. I served on that Citizen Advisory Committee for eight years and there were no recommendations to upzone these Kealia Ag District lands for urban district housing. Although the final draft plan never reached the Council for adoption, it did contain Growth Policies for East Kauai that **“discouraged the expansion of urban development in agricultural-zoned areas.”**

FEIS Appendix A

The assertion in Appendix A that residential expansion mauka is “spacially” consistent for the past 35-years is misleading because both the 1982 and the 2018 General Plan land use maps clearly show a residential growth boundary 3-times smaller in size than the proposed petition area. The map illustrations provided herein, give Commissioners a visual aid to assess whether the “interpretation” is valid.

The General Plan citations below also help substantiate the inaccurate interpretation of Appendix A as applied to the petition area.

PRELIMINARY TEN-YEAR GROWTH ALLOCATIONS BY COMMUNITY

Community Area	Allocations			
	Based on Current Infrastructure*		Based on Improved Infrastructure	
	Residential Units	Resort Units	Residential Units	Resort Units
Haena-Wainiha	50	0	100	0
Hanalei	50	0	100	0
Princeville	1,000	700	1,000	700
Kilauea	60	0	200	0
Anahola	125	0	225	0
Kapaa	160	0	800	0
Wailua	350	400	675	740
Hanamaulu	10	0	175	0
Lihue	150	0	600	100
Puhi	10	0	800	0
Koloa	150	0	500	0
Poipu	100	0	1,300	150
Kakaiula	10	0	25	0
Omao	75	0	75	0
Lawai	60	0	100	0
Kalaheo	220	0	500	0
Port Allen	10	0	100	100
Hanapepe-Elleele	75	0	600	0
Waimea	110	0	470	100
Kekaha	20	0	300	0
Total	2,795	1,100	8,645	1,890

* Without infrastructure improvements, these allocations are the preliminary total recommended for the future.

In Chapter 3 (page 26) of the **1982 General Plan** titled “Growth & Resource Management Parameters” there is a **“Ten-Year Growth Allocations by Community”** chart in which Kealia is omitted from the list of 20 communities.

Interestingly, the 1982 GP (page 31) recommended that “long range planning maps be presented annually to the public for review for the county to control the location of future growth.”!

Urban Sprawl

Increasing density in this rural community miles away from the Kapa‘a town core would be considered

sprawl. Since the County has not kept up with needed infrastructure improvements, it is crucial now to regulate the pace of development in the East Kauai corridor. Although the need for affordable housing is very real, the location of development, the timing of development and the amount of development for this project are all inappropriate.

Violation of HRS 343 and HAR 11-200 for Failure to Have Presented Alternatives in the FEIS

HAR §11-200-9(c) provides, "For agency or applicant actions, the proposing agency or the approving agency, as appropriate, shall analyze alternatives, in addition to the proposed action in the environmental assessment."

The FEIS failed to provide and analyze alternative density proposals that would have less impact on Kealia residents and the broader community. The current proposal has been referred to by some residents as “ghetto” lots.

The FEIS indicated the purpose and need for the project was to increase housing, but did not provide alternatives with reduced density to be more consistent with Kealia’s rural ambiance and community character. Lot sizes similar to those in the adjacent Kealia Town Tract (7 to 9,000 sf. instead of 5 to 7,000 sf.) would provide reasonable R-6 alternatives.

Lack of Transparency

From the outset of this project, there was no buy-in from the residents of historic Kealia Town Tract. From 2016 until December 2017 community dialogue was little to none.

Between 2016 and 2018 when the County was negotiating with Kealia Mauka Homesites, the General Plan Update was underway. However, the Kealia project was never mentioned at the G.P. public presentations or during County Council hearings. The fact that Kealia Mauka was omitted from the General Plan, demonstrates an unconscionable lack of transparency.

Lack of Consultation with Kealia Community

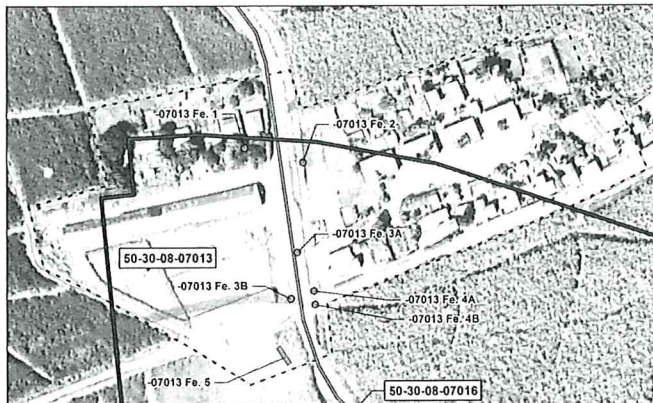
This FEIS failed to fulfil the “intent of the law” which is to inform citizens in a way and at a time and place so that they have access to the facts of the situation necessary to make their opinion of an impending action known to the public agency involved.

From 2016 until December 2017 outreach to the residents of historic Kealia Town Tract was little to none. Since the applicant choose NOT to hold a scoping meeting and an EA was not prepared prior to the EISP, resident input was severely limited.

When the EISP deadline for comments was approaching, Kealia residents finally received a preliminary letter (December 6, 2017) providing a link to the Prep Notice. There were no community meetings before or after the EISP other than the opportunity that our Wailua-Kapa‘a Neighborhood Association provided to fill that void. We hosted a public meeting on April 19, 2018 featuring the project representatives and of the 36 attendees (excluding the realtors), nearly all of the comments about the proposed action were unfavorable.

FEIS Omitted Soil Contamination Testing

Chemical contaminants from sugar plantation operations in the Kumukumu Camp area are expected according to the FEIS. This 1950 aerial photo clearly illustrates the pesticide/herbicide storage buildings in the upper left portion of the petition area.



The FEIS failed to include any soil testing reports and claims instead that testing will be postponed until there is “ground disturbing activity on the site.” The question is: why wait?

We ask Commissioners to require residual soil contamination testing at this time so that results can be included in the FEIS.

Potable Water Issues

After Kealia Water Company Holdings, LLC installed the water system to serve Kealia Town Tract and Kealia Kai (in early 2000) the County declined to acquire it, explaining that it was not built to county specifications. The FEIS says “they are unaware of this.” However, we suspect that little effort was spent to research this fact.

Additionally, the FEIS failed to disclose that residents have had water pressure problems all the while.

Inadequate Public Safety Analysis

The FEIS fails to address the insufficient ingress & egress access which depends solely on Kealia Road. The proposed Kealia Road improvements will not provide sufficient access to the 235-lot Petition Area.

Vehicle accidents, fires or EMT rescues can close down Kealia Road for hours, and residents need alternative routes to access the subdivision.

It is illogical that this high density project has only one access point, when in contrast, the Kealia Kai subdivision has 36 lots and 3 access roads from Kuhio Hwy.

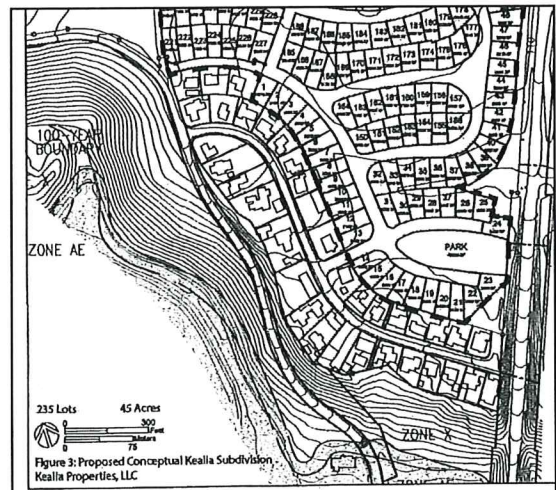
The FEIS failed to provide answers from the State DOT to our specific question as to why DOT would deny direct access to Kuhio Hwy along an existing cane haul road in the petition area, located directly opposite the southern Kealia Kai entrance. (*Interim DOT Director Jade T. Butay letter of 12.14.2017*)

Kealia Road Improvements

Current residents with homes located above Kealia Road worry that the proposed roadway widening and retaining walls may jeopardize their hillside properties.

The applicant's May 31, 2016 conceptual plan illustrates how steep the topography is on BOTH sides of historic Kealia Road. Yet, they plan to widen this 18-ft roadway to a 56-foot span - a ridiculous proposal!

Not pursuing the alternate access road along the existing cane haul road to Kuhio Highway (which has no elevation challenges) may imply that the landowner wants Kealia Road improvements to service the Ag subdivision which will likely follow as the next phase of development.



Violation of HRS 343 and HAR 11-200 Prohibitions Against Segmentation

Improper segmentation occurs where a second action that is part of an initial project and is a 'necessary precedent' for the development has been isolated as a component of the development for environmental assessment.

Specifically, the proposed improvements to Kealia Road are a necessary precedent for the development of the remaining 1,000-2,000 Ag District acres. Therefore, development of the entire area is being approached in piecemeal fashion with Phase 1 being Kealia Mauka Homesites.

Cumulative Impacts

The negative cumulative effects were not sufficiently addressed in the FEIS. The location of development, the timing of development and the amount of development are all inappropriate.

Clearly, the county has not kept up with needed infrastructure improvements. Therefore, it is crucial to regulate the pace of development in the East Kaua'i corridor. The existing infrastructure deficiencies -- most notably the long-standing traffic congestion in Kapa'a, will worsen. There is an urgent need to address congestion before increasing residential density here, which will otherwise place a huge burden on all residents.

Conclusion

The Final EIS (published July 23, 2019 in *The Environmental Notice*) is flawed and does not adequately assess the full extent of the environmental impacts of this project as required by HRS 343 and HAR 11-200. W-KNA urges the Commission to reject the FEIS.

The interpretation that the petition area is located in the county's urban-growth boundary is a false conclusion because the 53.4 acre petition area is approximately 3x the size of the Urban Residential designation in the 1982 General Plan and the 2018 General Plan!

This proposal falls far short in its intent to help satisfy the county's need for "affordable" housing. Although claiming to be aimed at local families, these lots will be sold at market value.

This rural area project exemplifies sprawl and requires commuting to jobs, schools, shopping and other needs through a congested traffic corridor. The General Plan recommends "urban infill" -- placing higher density development near jobs and services as the preferred means to achieve housing solutions.

In the County's drive to produce housing, a lack of transparency and lack of early consultation with Kealia residents occurred. The impacts that this high density proposal will have on existing residents have been minimized. The "sum of effects on the quality of the environment" and "both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action" will be devastating to this small rural neighborhood.

W-KNA believes the FEIS did not consider and satisfactorily respond to all comments received during the review of the DEIS. The FEIS failed to analyze alternate design proposals that might have less impact. The proposed action involves a substantial degradation of environmental quality -- physical, cultural and social impacts for Kealia Tract residents.

Mahalo for the opportunity to provide a greater level of detail that was not possible during the allotted time for public comments at the hearing.

Sincerely,



Rayne Regush
W-KNA Chair

Attachments:

- GENERAL PLAN 2018 - Future Land Use Map East Kaua'i
- GENERAL PLAN 1982 - Land Use Map Kapa'a-Wailua

GENERAL PLAN 2018 - Future Land Use Map East Kaua'i

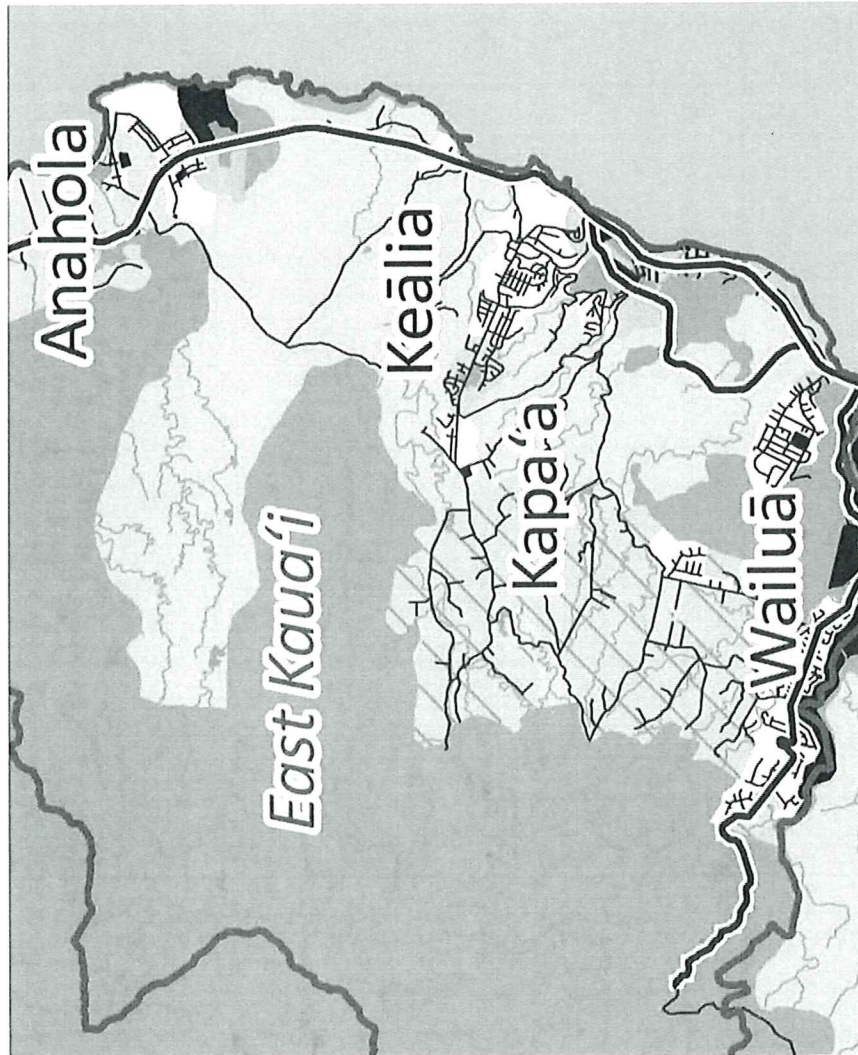
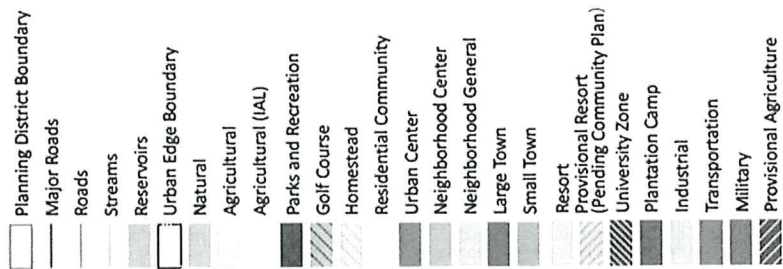
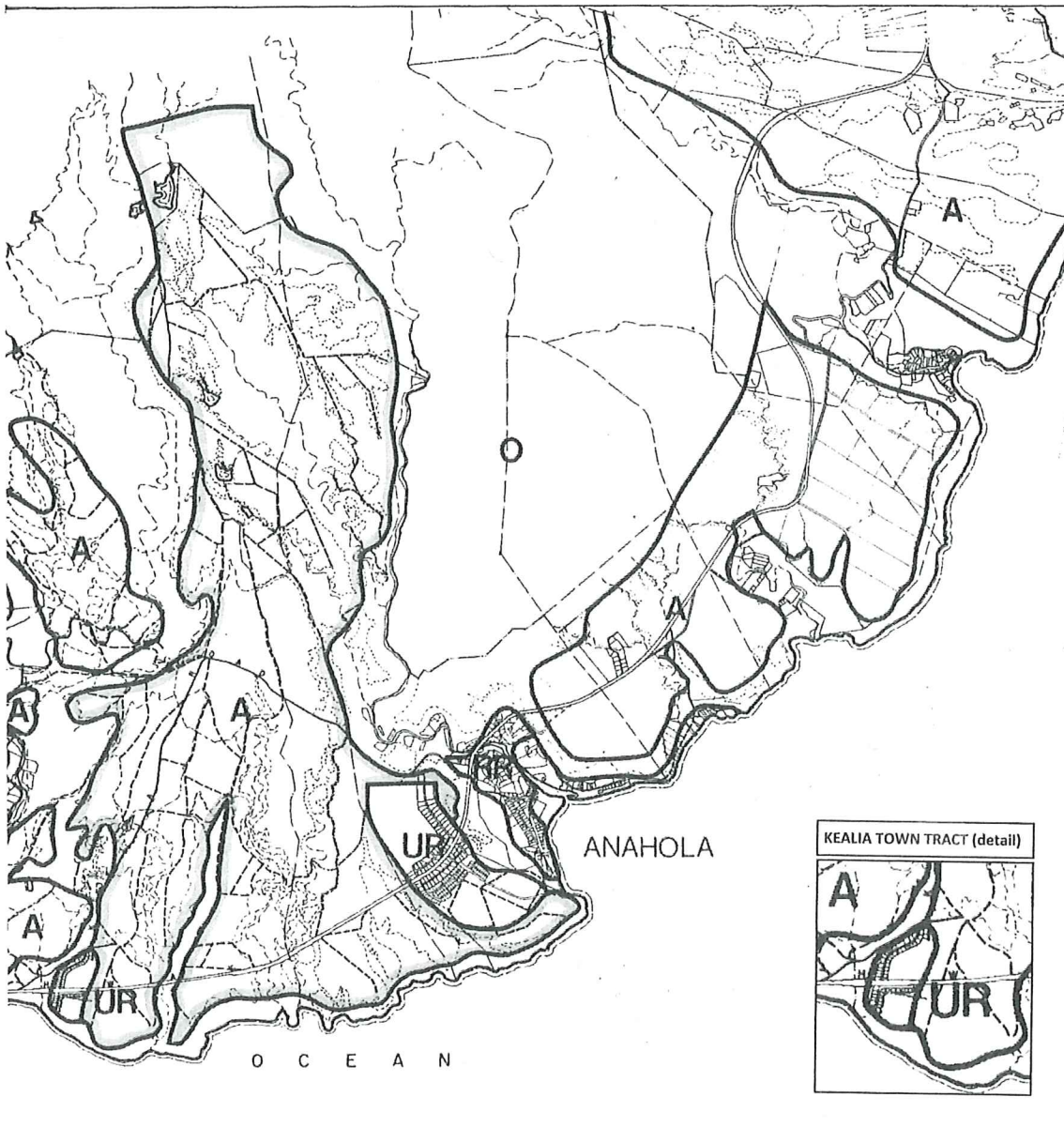


Figure 5-1 Kaua'i Land Use Map



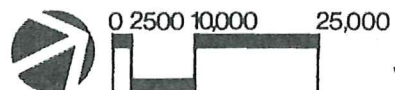
GENERAL PLAN 1982 - Land Use Map Kapa'a-Wailua



KAUAI GENERAL PLAN

LEGEND	O OPEN	UMU URBAN MIXED USE
	A AGRICULTURAL	R RESORT
	RR RURAL RESIDENTIAL	PF PUBLIC FACILITIES
	UR URBAN RESIDENTIAL	

KAPAA-WAILUA



JUNE
1982

Derrickson, Scott A

From: Diane Koerner <dianekoerner@yahoo.com>
Sent: Saturday, August 03, 2019 5:59 PM
To: DBEDT LUC
Subject: Testimony Re: Kealia Mauka Subdivision

Testimony Re: Kealia Mauka Subdivision

I live in Kapaa and am extremely concerned about development in Kealia Mauka without the necessary infrastructure. I currently spend my day trying to get from one job to another through Kapaa traffic that is slower than New York City's. I fear that up to 500 more cars entering the road in Kealia will make life unlivable for me and many others on this island any longer.

Kuhio Highway would have to have either a stoplight or roundabout at the corner of Kealia Rd and Kuhio Highway directly across from the main entrance to Kealia Beach. There is only one entrance/exit to the proposed subdivision. With traffic traveling fast downhill on Kuhio Highway, this is an unlikely and potentially dangerous spot for either of these proposals. Please remember that there already is an approved roundabout slated for Kuhio Highway at Mailehuna Rd., a short distance from the one proposed for Kealia Mauka.

The recent General Plan Update has emphasized the need to restrict development to Kauai's Urban Center (Lihue) as a measure to decrease traffic (and sprawl) in other areas. Kealia Mauka Subdivision, if approved, would significantly increase the we are experiencing now, plus that traffic generated from two already approved resorts slated to be built in the Wailua corridor. The proposed highway widening promised by the state, from the bypass to the traffic light at Kuamoo Rd., would not even solve the congestion we have now.

According to the FEIS, out of the total 235 lots for sale, only 36 would fall into the county "affordable" category. The other 199 lots would be sold at prevailing market prices. Furthermore, according to the developer, "a block of lots could be sold to a single purchaser who would construct the finished homes for sale." That means a developer selling houses to rich mainlanders, not providing needed housing for current residents.

In addition, Kealia Mauka subdivision would have a waste water pump station near Kuhio Highway. This has not yet been approved by the County Dept. of Public Works. In addition, the sewer main would need to cross Kapaa Stream (the sewage pipe would be mounted to the side of Kapaa Stream bridge) before connecting to an existing sewer manhole in front of the Kaiakea Fire Station, just north of Kapaa Town. Judging by the putrid odor and recent sewage spill at the Wailua River mouth, do we want to risk polluting Kealia Beach or add more sewage to the existing plant?

Please do not allow development of Kealia Mauka.

Mahalo for your time,

Diane Koerner

420 Molo St.

Kapaa, HI 96746

Derrickson, Scott A

From: Bart Walton <bartwalton@hotmail.com>
Sent: Saturday, August 03, 2019 6:06 PM
To: DBEDT LUC
Subject: Kealia Mauka Subdivision

Dear State Land Use Commission,

As a resident of Kauai, and in particular, the Kapa'a area, I am very much against the up-zoning of the 53.4 acre Kealia Mauka site from agriculture to urban classification.

1) First of all, if this development goes through, the impact on our already horrific traffic situation will become a nightmare. The quality of life for both residents and visitors is already diminished because of traffic congestion and if this development goes through, it will destroy life on the East side as we know it.

2) The argument proposed by the developers for "affordable housing" is completely bogus. According to the FEIS, out of 235 lots, only 36 would fall into the category of "affordable" by the county standards. And keep in mind, these are only lots. Do you think anyone on this Island who qualifies for affordable housing would have the money to build a house, even if they could manage to purchase a lot?

3) The infrastructure for this project has not been well thought out. The developers want to run sewage pipes along Kapaa stream and place a waste water pumping station on the highway. This is not good planning in light of eventual sea water rise, not to mention the potential for storm flooding and tsunamis. Do we really want to risk polluting Kealia Beach from a spill, like the one that occurred recently at the Wailua River?

Kauai is a small Island without a lot of resources. We are counting on you to protect us from big developers who want to bring in more people from the mainland and sell more expensive homes. We need to address the serious problems here on Kauai before we commit any more development - Problems like REAL (not bogus) affordable housing and REAL solutions to traffic congestion.

Thank you for listening, SBW

Samuel Bart Walton
Kapa'a, HI
808-346-9330

Derrickson, Scott A

From: Desiree Hoover <keepblue@yahoo.com>
Sent: Saturday, August 03, 2019 6:56 PM
To: DBEDT LUC
Subject: Do NOT upzone Kealia Mauka Subdivision from Kauai Resident of over 10 years

Dear Commission,

I am writing you this email as I can not take off work to go to the hearing 8/8 at KCC.

As a permanent resident of Kauai I am asking you to use your common sense, realise what this would do i.e. increase traffic and waste, stress the land, resources, and infrastructure. That area was sectioned off for agriculture for many reasons.

I urge you to deny the developer to upzone that area.

Mahalo Nui Loa,

Desiree Hoover

A very concerned Kauai resident

Derrickson, Scott A

From: Kathleen Dahill <kdahill56@gmail.com>
Sent: Monday, August 05, 2019 9:30 AM
To: DBEDT LUC
Subject: aloha - Kealia Mauka

Aloha e LUC,

If there is one thing the recent Mauna Kea events have reminded us, is that the 'aina is not separate from us. It is a living thing from which we draw our lives and our sustenance. The development of land is a process which must be done mindfully, thoroughly and inclusively.

It is one thing to look at a blueprint, it is another thing to implement a series of changes in real, physical space that will impact the community for years to come. Please choose mindfully in consideration of our future generations and the health of the 'aina. Mahalo.

Pumehana,

Kathleen
Kathleen Dahill
e-mail: kdahill56@gmail.com
website: WildwdStudios.com

Derrickson, Scott A

From: Leslee Manima Dancosse <dancosel@gmail.com>
Sent: Monday, August 05, 2019 7:41 PM
To: DBEDT LUC
Subject: DO NOT APPROVE DEVELOPMENT OF KEALIA MAUKA

Land Use Commission,

We cannot deal with anymore traffic in Kapa'a that would be a horrific nightmare, it's already a nightmare! You need to learn/know how to say no, to BE the stewards of this island and care about the future generations of the island!!

Mahalo 🌴

Leslee Dancosse
Resident for 43 years on Kauai

--

"Were we to apply our dollars intelligently to the people who take care of children, we would spend millions of dollars less on the damage done to our society by wounded adults. Wounded children become wounded adults, and wounded adults can destroy a planet." Marianne Williamson

"By three methods we may learn wisdom: First, by reflection, which is noblest; second, by imitation, which is the easiest; and third by experience, which is the bitterest." ~ Confucius

Derrickson, Scott A

From: bob-marion@hawaiiantel.net
Sent: Monday, August 05, 2019 8:06 PM
To: DBEDT LUC
Subject: Upzoning of 53.4 acres Kealia Mauka subdivision

We are very concerned about the application to upzone these 53.4 acres at Kealia Mauka from agriculture to Urban.

This proposed subdivision would add to the Traffic problems in Kapaa. There is only one road in an out of this property of the proposed 235 lots

The proposed round about or traffic light would be too close to the one already planned for Kuhio Hwy and Mailehuna Rd.

There are serious concerns in regards to the sewer needs for this proposal. This will stress our already overloaded and aging infrastructure.

There will be only a small amount of affordable homes included which means these homes will be for new residents coming to the island and not be serving our current residents in need of homes.

We strongly oppose the approval of this subdivision. This area is not appropriate for urban upzoning.

Sincerely,

Robert and Marion McHenry

Princeville

Derrickson, Scott A

From: Deborah Pence <debponce@earthlink.net>
Sent: Monday, August 05, 2019 9:11 PM
To: DBEDT LUC
Subject: Opposing Development at Kealia Mauka

I am a Kauai Resident for 19 years.

Recent years of traffic through Kapaa has altered my ability to get to work and shop in Lihue.

Any proposed development that would add to the problem is unacceptable to the existing residents and visitors until there is a way to manage additional traffic without imposing additional hardship upon us.

Please deny proposals to further development until traffic management has been satisfactorily addressed.

Mahalo, Deborah Pence

Derrickson, Scott A

From: mkelley323@gmail.com
Sent: Monday, August 05, 2019 9:32 PM
To: DBEDT LUC
Subject: Testimony against the up-zoning of 53.4 acres from Agriculture to Urban for Kealia Mauka Subdivision

Importance: High

Aloha,

As a resident of Kauai, I am writing today to express my opposition to the up-zoning of land for Kealia Mauka Subdivision. I have 3 main concerns.

TRAFFIC: The hundreds of more cars from this development will add to the Kapa'a Traffic Dilemma/mess that we are experiencing now.

AFFORDABILITY: Only 36 out of 235 lots will be affordable. According to the Final EIS, houses built on the lots will be sold at Market Value. We need affordable housing for our residents.

AGING INFRASTRUCTURE: The vulnerability of the existing infrastructure and potentially dangerous intersection where Kealia Road meets Kuhio Highway directly across from the main entrance to Kealia Beach.

Please do not up-zone the land for this development!! We need some problems fixed before and if we move forward on this subdivision.

Thank you,
Mary Lu Kelley
PO Box 289
Lawai, HI 96765

Derrickson, Scott A

From: jcwhite54@gmail.com
Sent: Tuesday, August 06, 2019 5:20 AM
To: DBEDT LUC
Subject: Kealia upzoning

Aloha,

Please accept my testimony, as a concerned citizen of Kapaa, Kauai, AGAINST the upzoning of ag lands for Kealia Mauka development.

We need housing for our community that is truly affordable, built with density, walkability and access to services that will have the least negative impact on our aina.

Respectfully,

Judith C. White

Kapaa

Sent from my iPad

Derrickson, Scott A

From: ryan perkins <ryan.perk@hotmail.com>
Sent: Tuesday, August 06, 2019 7:11 AM
To: DBEDT LUC
Subject: NO!!!! to Kealia Mauka Subdivision

Aloha,

To whom it may concern, I vote NO to this planned sub-development of Kealia. The added traffic, the potential for sewage and pollution of Kealia beach which is one of the consistently clean beach beaches we now have on Kauai, as well as the small number of homes that will be available to Kauai families as 'affordable' housing. I cannot believe this plan has been able to gain any traction whatsoever and again I vote NO to any sub-development of this beautiful area.

Ryan Perkins
808-651-6372

Derrickson, Scott A

From: Marj Dente <mdente@hawaii.rr.com>
Sent: Tuesday, August 06, 2019 9:05 AM
To: DBEDT LUC
Subject: Kealia Mauka Testimony

To whom it may concern....I am totally against developing the Kealia Mauka proposal, upgrading acreage from agricultural to urban. Plans for the access from Kuhio Highway to a proposed subdivision are unbelievably flawed, placing every potential homeowner and more importantly existing residents of Kealia and Kaa Roads in very dangerous situations.

Aside from the fact that the percentage of proposed residences is very low, the carrying capacity of our existing sewer treatment facility is very questionable with the inaccurate information that it can handle more raw sewage.

Very affordable housing with small apartment type housing is desperately needed on Kauai, NOT highly priced separate residences that will be gobbled up by off island buyers, no matter what the current developer is trying to convince otherwise.

Please represent me and deny the upzone.

Marj Dente, 30 year resident property owner
6335 Waipouli Rd, Unit B, Kapaa, HI 96746

Derrickson, Scott A

From: Andy Bushnell <bushnell.andy@gmail.com>
Sent: Monday, August 05, 2019 8:03 PM
To: DBEDT LUC
Subject: Kealia Mauka Subdivision

6510 Olohena Road

Kapa`a HI 96746

August 5, 2019

Hawaii State Land Use Commission

Re. Upzoning of 53.4 acres of Agricultural Land to Urban

for the Kealia Mauka Subdivision

Dear sirs,

I testified before you on July 25th but felt I should take this opportunity to make sure that my points were made clearly. I am concerned about the cumulative effects of traffic in Kapa`a that will be added to by this project. As I hope you know Kapa`a already has horrendous traffic problems with no solutions in sight. Virtually every day there is bumper to bumper traffic for the better part of a mile through the town. On most week days cars come to a complete stop, move forward a few yards, and then stop again for much of this distance. In other words, the congestion is REALLY BAD.

Over the course of the next year or two there are three hotels (Coconut Plantation, Coconut Beach Resort and Coco Palms) which already have the zoning and some of the permits that they need to build along this same corridor. According to 2018 General Plan (Appendix p. 373) they will add 877 rooms to the Kaua`i hotel inventory and well over a thousand additional cars [when counting employees and other services required to operate] to the already impossible traffic congestion.

The state has plans to extend the northern portion of the Kapa`a by-pass road to make it a two-way road, which will have essentially no impact on the worst part of the traffic congestion and plans to widen Kuhio Highway in the vicinity of Coco Palms which probably will improve conditions somewhat, but not enough to handle the additional traffic brought by the new hotels. At best traffic in Kapa`a will move faster as far as Wailua bridge, only to back up at the Hanamaulu intersection as is already happening on a daily basis.

The Kealia Mauka FEIS does not address any of these issues beyond mentioning the extension of the Kapa`a by-pass which, as I suggested will have minimal impact on traffic on Kuhio Highway. I would suggest that you require the Kealia Mauka developers to incorporate information about the potential traffic impacts of their development on Kapa`a traffic beyond the connection of their subdivision to Kuhio Highway. It would, of course, be unfair to hold them responsible mitigating these larger impacts, but it also would be unfair to burden the larger Kapa`a community with these impacts. That is why the most recent Kaua`i General Plan calls for development in and around Lihu`e and not in the vicinity of Kealia Mauka!

Thank you for your time and efforts on our behalf.

Sincerely yours, Andrew F. Bushnell



Virus-free. www.avast.com