

Stream Impacts.

- a) Provide confirmation whether or not the “unnamed” Stream referenced in the DEIS (eg. Water Resources, page 77, Section 4.6.1) is actually Waikaea Stream which crosses Olohena Road and the Bypass Road from Hokua Place and empties into the Waikaea Canal. The Google Earth picture we inserted here identifies Waikaea Stream with a blue line.



- b) On page 77, the DEIS says: “HoKua Place is committed to keeping the flow of the stream consistent”. Therefore, please include base flow information for this stream.
- c) Provide the distance between the location of the Potable Well and the Stream, and to the Spring identified on page 86 on the map.

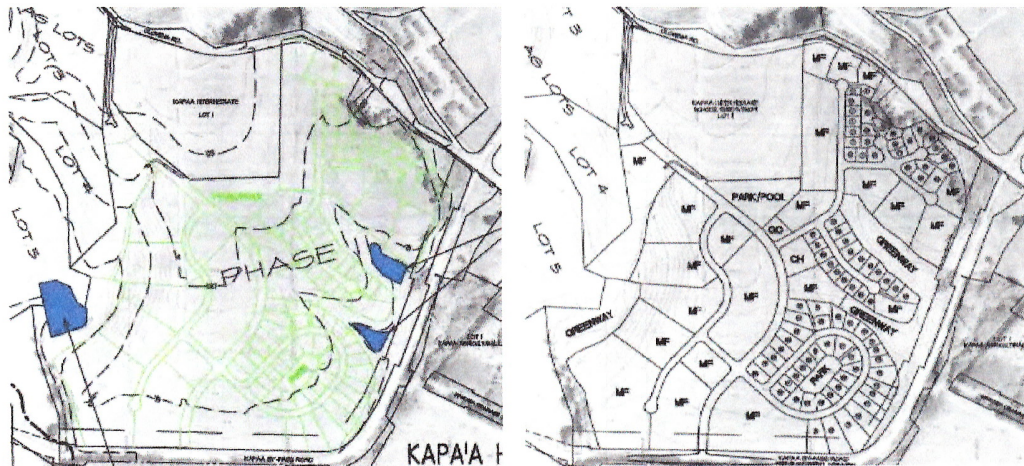
Inconsistent Information.

- a) Many documents in the DEIS were prepared years earlier for Kapa`a Highlands. Please describe each instance where the information may not apply to HoKua Place.
- b) HoKua Place is a hillside development so we question why there are so few references to this fact. The aerial photos also appear to flatten out the terrain.
- c) On Page 19: Natural & Cultural Resources, it notes: “Should any archaeologically **significant** artifacts, bones, or other indicators be uncovered during construction...”. Since a cultural site monitor is not proposed, who is qualified to determine whether finds are “significant”?
- d) Page 19: Land Use. To our knowledge, there is no county document called the “Kapa`a-Wailua Basin Community Plan”. However, there is a 1973 Kapa`a Wailua Development Plan. It has not been updated. So, saying the project is consistent with that Plan, evades that fact that a 4-decade old plan is not optimal.

Drainage.

- a) The Preliminary Engineering Report on Drainage Improvements (Exhibit F) is extremely brief. As stated: “the topography varies from gently sloping, bluff top property, to steep areas that drop off into drainage gullies” therefore a more detailed analysis on the impacts of storm water runoff and maintaining pre-development drainage flow volumes and patterns is warranted.
- b) The drainage system refers to three detention basins which are also labelled as “Greenways” on the maps. Please provide photographs of these areas and also a visual rendering of how these dual-purposed gullies will be used.





#### Visual and Aesthetic Resources.

- Significant views of Nounou Mountain Range and Mount Waialeale can be seen from the Middle School property. Discussion has been omitted concerning how the development will impact the line of sight to this spectacular scenery.
- The surrounding landscape offers sweeping vistas looking makai to the ocean and mauka towards the mountains. The development needs to provide scenic overlooks and vista points for public benefit. The 3-acre park may not offer sufficient views of these dramatic panoramas.
- The “Photo Tour” in section 4.4.1 Environmental Setting (pages 63-69) minimizes the project’s visual impacts from different public vantage points along the Bypass and from Olohena Road.
- The two photos below are far more representative of the views “approaching HoKua Place, driving North on the Bypass Road” than Photo Tour picture #1 (page 64) in the DEIS.



**The downhill slopes below the Middle School campus will be populated with new urban district housing, replacing the existing agricultural vistas.**

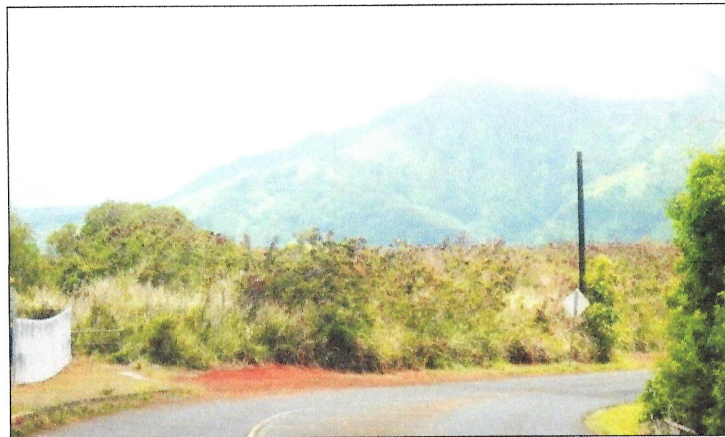
- From Olohena Road near the fork at Ka’apuni, views such as the panoramic photo below, is far more representative than DEIS photos #15 and #16 (pages 68-69).





**Panorama of the HoKua Place development site looking southeast with expansive ocean views and in the far distance is Hoary Head/Haupu Mountain Range in Lihue.**

- f) DEIS photo #13 (page 68) is a poor representation of “Looking across the west side of the Middle School parking lot, Hokua Place is beyond.” In contrast, our photo below shows the school parking lot fence (lower left corner) and the dirt road (proposed “Road A”) where it meets Olohena Road, traveling mauka just before the fork. Makaleha Mountain Range and the “lei of pearls” (waterfalls) are visible.



- g) There are also spectacular views of Mount Waialeale on days without a cloud cover. Scenic and open space resources are important assets to the community.
- h) To preserve views, we strongly encourage the developer to commit to undergrounding electric lines, which currently, they state is “dependent on funding”.

Secondary and Cumulative Impacts.

- a) The DEIS fails to note that the County’s General Plan 2000 is outdated and that many of the recommended implementing actions did not occur. A General Plan update has just launched, therefore the first paragraph on page 153 is inaccurate.
- b) Secondary impacts relate principally to overburdened roadway infrastructure and public facilities and services which don’t meet demand. Please describe the extent to which increased tax revenues from new housing will offset and exceed the demand for additional police and fire protection and new roadway improvements.

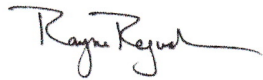
- c) Cumulative impacts relate to HoKua Place in the context of two large resort developments approved just a few miles away – Coconut Beach Resort (343 units) and Coconut Plantation Village (198 units) along with pending permit approvals for the Coco Palms Resort's 350-unit hotel. Please discuss the social impacts or diminished quality of life from the anticipated population growth from these resorts.
- d) The information provided from the DOE's Classroom Utilization Report 2007-2008 and the School Status and Improvement Reports for School Year 2010-2011 (pages 112-113) would be more meaningful if you provide charts showing multiple years, and include more current data.

DEIS Volume II.

- a) Volume II is almost 400 pages in length and should have been paginated. It is extremely challenging to navigate the Appendices.
- b) W-KNA did not receive the consultant's undated letter acknowledging our EISPN comments, but we did see it reproduced near the end of Volume II.

Thank you for the opportunity to comment. We look forward to a detailed response from the consultant, Ho'okuleana LLC and a copy of the FEIS.

Sincerely,



Rayne Regush  
Chairperson, on behalf of the W-KNA Board