

## **GROUP 3 - RESPONSES TO AGENCIES COMMENTS**

**Agor Jehn Architects, LLC**  
**119 Merchant Street, Suite 605A**  
**Honolulu, Hi 96813**  
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**909-947-2467**

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Date: 7-29-2019

RE: HoKua Place  
Response to Comments from Office of Planning on 2<sup>nd</sup> DEIS (12-21-18)

TO: To Whom It May Concern:

Thank you for your comments. Our response item numbers corresponds with you comment item numbers.

Page 1

Item 1:  
Noted.

Item 2a, 2b:  
All references to Product Sales Price Projections and Product Closing Projections have been updated.

Item 2c:  
An updated Market Study is inserted as Exhibit A.1, in Vol II A.

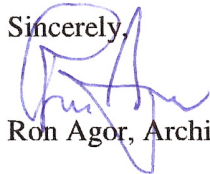
Page 2

Item 3:  
Exhibit "O" has been replaced with a legible copy.

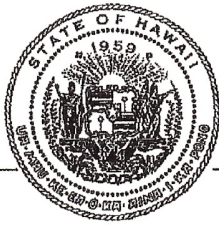
Item 4:  
The Development Status and Implementation Schedule states that the completion time is to be 10 years from receiving all discretionary approvals.

Item 5:  
A statement on "Ka Paakai" has been added on Page 53.

Sincerely,



Ron Agor, Architect



## OFFICE OF PLANNING STATE OF HAWAII

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DAVID Y. IGE  
GOVERNOR  
  
LEO R. ASUNCION  
DIRECTOR  
OFFICE OF PLANNING

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 (2<sup>nd</sup> 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

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 ("2<sup>nd</sup> 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 2<sup>nd</sup> 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 2<sup>nd</sup> 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 Orodenker  
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 2<sup>nd</sup> 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 2<sup>nd</sup> 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 2<sup>nd</sup> DEIS.

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

Sincerely,



Leo R. Asuncion  
Director

**Agor Jehn Architects, LLC**  
**119 Merchant Street, Suite 605A**  
**Honolulu, Hi 96813**  
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**909-947-2467**

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Date: 7-8-2019

RE: HoKua Place  
Response to Comments from Office of Planning on 2<sup>nd</sup> DEIS

TO: To Whom It May Concern:

Thank you for your comments. Our response item numbers corresponds with you comment item numbers.

Page 1

Item 1:

Full listing of appendixes and studies added.

Item 2:

The timetables have been revised.

Item 3:

The project building out is anticipated for ten years.

Item 4:

Exhibit "L" Page 437 in Volume II is the SHPD approval letter. Revisions to Nancy McMahon's comment was made on Page 31 of Volume I.

Item 5:

The "Potential Impacts to Protected Species" section studies the Hawaiian Hoary bat Seabirds. Please refer to Page 432, Exhibit "K" of Volume II-B.

Item 6:

Refer to Exhibit "N.1" , Topography map in Volume II-B for slopes.

Refer to Exhibit "C", Agricultural Master Plan in Volume II-B for soil classifications and information on ALISH ratings.

Item 7:

Noted

Item 8:

Noted

Item 9:

Statement included.

Item 10:

Refer to Exhibit "C", Agricultural Master Plan in Volume II-B for soil classifications.

Item 11:

All Exhibits for comments and responses to comments are included in Volume II-B

Item 12:

Exhibit "A.1", New Market Study in Volume II-A and Pages 11 to 14 in Volume I corroborate with each other.

Sincerely,

Ron Agor, Architect

May 14, 2019  
OFFICE OF PLANNING PRELIMINARY COMMENTS  
HoKua Place  
DRAFT FINAL EIS

Proposal:

97-acre Reclassification from Agricultural to Urban

Mix of lots, single-family and multi-family residential. Market and affordable. Accessory uses.

683 Multi-family

86 single family lots and homes

Affordable housing will be on-site.

3.1 acre park adjacent to Kapaa Middle school

1.4 acres commercial use

Transportation improvements include intersection on Kapaa Bypass road, bus stops, sidewalks and bike and walking paths to existing Kapaa Middle school.

**Approvals Required:** LUC Boundary Amendment; County Class IV Zoning & Use Permits;  
County Council Approval for Zoning Change; Subdivision Approval;  
Building Permits

Project description also includes an adjacent 163-acre parcel referred to as HoKua Farm lots, an agricultural community which will share infrastructure. A solar farm is located on Hokua Farm lots and produces 1.18 megawatts, feeding into the Kauai grid.

Comments and concerns:

1. Page 2 or 7. Should have a full listing of the appendixes and studies.
2. Page 12: Development timetable. Completion of project
  - a. 36 large lots- years 2020 to 2023
  - b. 50 Medium lots—years 2020-2026
  - c. 500 Multi-family –years 2020-2026
  - d. 183 Affordable housing – 2020-2024
3. Page 16. 1.5 Project Development Status and Implementation Schedule. Project building out is ten years.
4. Page 30. 4.2 Archaeological, Historic and cultural Resources.
  - a. Page 30-44. Only an Archaeological Assessment was completed and a Cultural Assessment was completed of the Petition Area. The document indicates that an Assessment is not an inventory-level survey as per the rules and regulations of SHPD.
  - b. No archaeological and historic sites were found. No mitigation measures were recommended other than standard –if any are found during const. etc.
  - c. No SHPD letter was attached or referred to. Any SHPD letters and approvals should be attached.
  - d. Page 44- 51 . Cultural resources. Kapaakai impacts discussed, not sure if this section is adequate. Only 5 individuals were interviewed.
  - e. **Page 51 and 52 conclusion and mitigation. No mitigation needed, and no further work was recommended. However, no approval letter from SHPD.**

**There may have been an Archaeological Inventory survey, however, there is no supporting evidence. This is a deficiency.**

- i. Exhibit R. Nancy McMahon email to Ron Agor dated December 10, 2018. Nancy indicates that Section 4.21 Environmental Setting. The information is incorrect. She indicates that if no archaeological resources are found on the site, then it is re-designated from an archaeological inventory survey to an assessment. She refers to other letters and approvals from SHPD that is not indicated in the Draft Final EIS. She suggested a revision of this section that was not included in the Draft FEIS. Note that the document does not include any of this information.
5. Page 53 Biological resources. Exhibit J.
  - a. No botanical species of note found on Petition area.
  - b. Avian and Mammalian survey. Exhibit K. No avian and mammal of note was found, however, they did mention the Hawaiian Hoary bat was possibly present and that other seabirds may fly over the site.
  - c. Invertebrates. Exhibit P
6. Page 73-77. 4.5 Geology, Soils, and Slope Stability. **No information on ALISH ratings on Petition Area is included.** Also, no information on slope is including in this section.
7. Page 108, Education. DOE indicates no need to collect fees from Petition Area.
8. Page 114. Traffic. New TIAR Exhibit H.
9. Page 184 and page 202-203 Coastal Zone Management Act. Does not include a statement that the Coastal Zone is the entire island/state.
10. Page 200 Agricultural Uses and Suitability. Exhibit C. LSB ratings are within this section, but no relevant map showing the ratings and acreage of land within each rating are given for the Petition Area.
11. Page 210. Chapter 6. Comment letters, agency, etc. Exhibits Q and R. Only Exhibit R was submitted to us for review. All the agency comments are within Exhibit Q, which was not included. Could not be reviewed. This is a deficiency.
12. Only minimal exhibits were included. New Marketing study and Exh. R. Cannot corroborate other Exhibits and especially agency comments and responses.



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Date: 7-29-2019

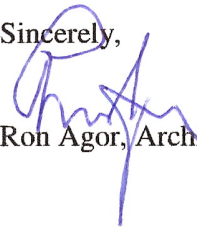
RE: HoKua Place  
Response to Comments from Department of Education on 2<sup>nd</sup> DEIS

TO: Mr. Kenneth G. Masden II  
Public Works Manager  
Planning Section

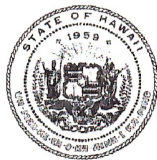
Thank you for your comments. We have incorporated your comments into the Draft Final EIS for HoKua Place on Pages 110-111.

Attached is your letter with your comments.

Sincerely,



Ron Agor, Architect



**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

December 26, 2018

Mr. Ron Agor  
Agor John Architects LLC  
460 Ena Road, Suite 303  
Honolulu, Hawaii 96815

Re: Second Draft Environmental Impact Statement for HoKua Place  
Kapaa, Kauai, TMK: 4-3-003:001 por.

Dear Mr. Agor:

The Hawaii State Department of Education (HIDOE) has the following comments for the Second Draft Environmental Impact Statement (DEIS) for the proposed HoKua Place residential project on approximately 97 acres of land located at Kapaa, Island of Kauai, Hawaii, TMK 4-3-003:001 por.

The HIDOE previously provided written comments on the proposed project via letters dated August 13, 2012, January 15, 2015, and June 4, 2015.

In 2017, the HIDOE conducted a statewide assessment of classroom capacity. Classroom capacity for Kapaa Elementary, Middle, and High Schools has been revised. Kapaa Elementary has classroom capacity for 942 students with a 2018 enrollment of 904 students. Kapaa Middle has classroom capacity for 781 students with a 2018 enrollment of 607 students. Kapaa High has classroom capacity for 952 students with a 2018 enrollment of 1083 students.

Thank you for the opportunity to comment. Should you have questions, please contact Robyn Loudermilk, School Lands and Facilities Specialist of the Facilities Development Branch, Planning Section at 784-5093, or via email at [robyn\\_loudermilk@notes.k12.hi.us](mailto:robyn_loudermilk@notes.k12.hi.us).

Respectfully,

A handwritten signature in blue ink, appearing to read "Kenneth G. Masden II".

Kenneth G. Masden II  
Public Works Manager  
Planning Section

KGM:rl

c: William Arakaki, Complex Area Superintendent, Kauai  
Office of Environmental Quality