

Derrickson, Scott A

From: Anne Walton <annehugginswalton@gmail.com>
Sent: Wednesday, December 04, 2019 2:59 PM
To: DBEDT LUC
Subject: Comments on Hokua Place FEIS
Attachments: Comments on Hokua Place FEIS.pdf

Aloha Land Use Commissioners,

I have conducted a thorough review on the Hokua Place FEIS and attached my comments to this email (pdf). Please review before you make a decision at your December 17-18 meeting on Kauai.

Mahalo for your consideration of these important points.

Kind regards,

Anne Walton

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I ask you to please wake up, and make the changes required possible. To do your best is no longer good enough, we must all do the seemingly impossible. We can no longer save the world because the rules have to change. Everything has to change, and it starts today. - Greta Thunberg

COMMENTS ON
SECTION 343-5e HRS
HOKUA PLACE ENVIRONMENTAL IMPACT STATEMENT – VOLUME 1
NOVEMBER 2019

Submitted by Anne Walton
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	Page, Paragraph, Line	Referenced Language	Comment
1	Pg. 12, table 1	Affordable House Dwellings - \$175K-\$275K (retail price per unit)	Not clear what size each unit will be, or how many attached units within a complex. This does not appear to be a realistic price range for built out units unless they are equivalent to studio apartments.
2	Pg. 13, para 5, line 2 (comment also applies to page 115)	The park will have an area for the County's proposed relocation of the Kapa'a County swimming pool.	My understanding is there is no basis for this claim as neither Hokua Place nor the County have made a commitment to pay for the building of the pool and associated facilities.
3	Pg. 13, para 7, line 1 (also pg. 20) (comment also applies to page 115)	A remnant parcel of 1-acre on the Makai side of the Kapa'a Bypass Road is also proposed as commercial use or for sub-stations for the police and fire departments.	Do the police and fire departments have a need or interest in building sub-stations on this property, especially considering their already close proximity to Hokua Place?
4	Pg. 13, para 9 (Project Components Include)	Mix of single-family and multi-family residential (with projected prices noted in 2015 dollars - final pricing is subject to market conditions:) <ul style="list-style-type: none"> · 183-Multi-family Affordable units <ul style="list-style-type: none"> o \$175,000.00 to \$275,000.00 Affordable multi-family units on site 	Real estate market conditions, particularly in a market where nearly half of all residential sales are to mainlanders and foreign buyers, cannot be the metric for determining what is to be labeled "affordable housing". Affordable housing is calculated according to the amount of household income dedicated to monthly housing costs (whether for rent or mortgage).
5	Pg. 20, para 8, line 2	Additional sustainable connectivity concepts including bikeways and walkways to and from the pool, neighborhood commercial areas, the middle school and Kapa'a's town core are planned.	Bikeways and walkways connecting Hokua Place to the town core would require the developers to be making alterations along side County roadways and adjacent set back areas, which seems highly unlikely.
6	Pg. 20, para 10, line 1	Sustainability Programs and Plans: HoKua Place will incorporate the core principles of the various sustainability programs and plans.	The term "sustainability" is used throughout this document without any specific definition articulated in the document. In actuality, the 12 components under this section sound like a wish list rather than a standard the project will actually be held to by the County.
7	Pg. 24, 3.1	There would be no diverse, environmentally	Under no condition would agricultural lands converted to residential

	<p>Alternative 1</p>	<p>conscious, residential community with single- and multi-family residential, affordable housing, commercial, a walkable street network and a range of housing options.</p> <p>The land would remain in the State Lands Use Agricultural District.</p> <p>Without the Project, housing inventory in Kapa'a would remain low. Affordable housing options in Kapa'a would be limited.</p> <p>The County would not have a location for its County pool and residents in Kapa'a would not have the opportunity for pool use.</p> <p>Additionally, the "no action" alternative will be contrary to the updated Kaua'i General Plan in that the General Plan specifically designates the property as Neighborhood General and discusses the need for housing in the area.</p> <p>Because the No Action alternative does not meet several HoKua Place objectives and does not implement the Kaua'i General Plan, this alternative has been rejected.</p>	<p>use at this scale be considered "environmentally conscious". This is a false statement.</p> <p>Housing inventory on Kauai is actually not low, at any given time there are between 800-900 residential properties on the market (as of this writing on 11/15/19 there are 808 properties on the MLS which does not account for FSBOs).</p> <p>Although the County has been presented with a potential site for their pool, it has not been determined who will pay for building and maintaining the pool. As such, this should not be considered a loss if Alternative 1 is the final outcome of this project.</p> <p>In actuality, Alternative 1 does meet the policies to guide growth in the Kauai General Plan including: Policy 1: Manage Growth to Preserve Rural Character Policy 8: Protect Kauai's Scenic Beauty Policy 9: Uphold Kauai as a Unique Visitor Destination Policy 11: Help Agricultural Lands Be Productive Policy 12: Protect Our Watersheds</p> <p>The FEIS has only evaluated the negative effects of Alternative 1 (from a developer's perspective), however, from a community perspective Alternative 1 has many positives including: 1. Meeting the General Plan's policies (as indicated above) 2. Ensuring the already unmanageable traffic conditions in Kapaa are not further exasperated by a large scale development in Kapaa 3. An aging and inappropriate infrastructure is not being further taxed by a large scale development until we have a better assessment of the condition and extent of the existing infrastructure 4. Over capacity schools on the east side will not be further unduly crowded by this large scale development</p>
8	Pg. 24, 3.2 Alternative 2	As outlined in the Kapa'a Highlands Agricultural Master Plan, crop suitability for the Project site is low. The climate and soils at HoKua Place are not ideal for the growing of most commercially viable crops due to	One of the most compelling reason Hokua Place uses for not allowing the project land to stay as agricultural land is due to poor soil quality and growing conditions, as indicated in the text in the box to the left. However, the soil studies indicate a range of soils and potential crops

		the poor soil, strong trade winds and the salt spray from the ocean. Additionally, due to the generally poor soils and harsh climate, the commercial crops most suited to the area are sugar and pineapple.	for cultivation including (extracted from page 77 of FEIS): sugarcane, pasture, pineapple, irrigated and non-irrigated orchards, irrigated and non-irrigated truck crops. Given the need and priority in the Kauai General Plan to increase food production on Kauai, Alternative 2 would actually have a positive impact on this policy.
9	Pg. 73, para 1, line 1	The Project site is not part of a scenic corridor and the Project will not affect scenic vistas and view planes.	The bulk of the 97 acre project will be visible from either Olohena or the By-Pass Road disrupting the scenic vistas, both looking in the direction of mauka and makai , making the visual impact "significant".
10	Pg. 79, para on "Aquifer" and Pg. 80 table of water demands	The source of water for the HoKua Place is in the Anahola Aquifer System. The state's 2019 updated WRPP (Water Resource Protected Plan) information on the Anahola Aquifer indicates a Sustainable Yield of 21 MGD. There was no new information on pumpage or full built-out demands in the WRPP 2019 update. The WRPP of 2008 indicates that the pumpage for the Anahola Aquifer was at 2.8 MGD. The County of Kauai DOW assessment of demand for Anahola Aquifer in 2014 stated that the demand for full built-out under the County Zoning is 5.5 MGD and for the General Plan 10.85 MGD. In summary, the current information available indicates that the Anahola Aquifer Sustainable Yield is at 21 MGD and the maximum demand at full built-out is projected to be 10.85 MGD.	The text explaining the availability of water through the Anahola Aquifer System (pg. 79) and the different level of consumption for the Hokua Place project (pg. 80) are using different metrics (MGD vs GPD), making it difficult to calibrate whether the available and the use of water are in concert or not. Also, this does not take into account other potential demands in the Anahola Aquifer System by other potential new developments in the area such Kealia Mauka, Coconut Beach Resort, Coconut Plantation village and Coco Palms – all within Kapaa. It is stated on pg. 106 of the FEIS that the 2 Coconut Coast resorts are slated for completion in 2-5 years, which would be sooner than Hokua Place.
11	Pg. 82, last para, last line	All of HoKua Place will be connected to the County's centralized sewer system to eliminate the wastewater treatment and disposal issue for this more densely developed area.	Given all the new developments proposed for the east side of Kauai (Kealia Mauka, Coconut Beach Resort, Coconut Plantation Village and Coco Palms), the fact that we have an aging infrastructure, and the Lydgate treatment plant needs to be moved because of it's condition and the threat of sea level rise, Hokua Place will significantly impact an already severely stressed system. This is not addressed in the FEIS.
12	Pg. 94, para 5	The Sewer Design Standards, 1973 by the County of Kaua'i, Department of Public Works, together with the Wailua Facility Plan, September 2008 by Fukunaga	These data are too old to be relevant today, especially given the population of Kauai in 1970 (closest calculation to 1973) was 29,524 and today it is 71,780. This increase in population has enormous

		and Associates were the primary references for the preliminary wastewater report for HoKua Place (Exhibit G) and will be abbreviated as SDS and WFP, respectively, when quoted in the following summary.	implications in regards to increases in wastewater. Projected forward, additional inputs from Kealia Mauka, Coconut Beach Resort and Coconut Plantation Village (not to mention the possibility of Coco Palms) needs to be a part of the calculation. It is stated on pg. 106 of the FEIS that the 2 Coconut Coast resorts are slated for completion in 2-5 years, which would be sooner than Hokua Place.
13	Pg. 101, para 3, lines 3 & 4	<p>Because there are only six years of capacity left in the current landfill, the County is currently pursuing a new landfill in a more central location (in the vicinity of Lihu'e.) There is necessary capacity to accommodate the proposed Project.</p> <p>Kauai has several solid waste diversion programs with several other proposals in progress that will likely be implemented by the time this Project is under construction that the Project will have to adhere too to minimize solid waste generation.</p>	Because the issue of the future landfill has yet to be resolved, the last sentence: "There is necessary capacity to accommodate the proposed Project." is a presumption without any basis. This also applies to the "solid waste diversion programs".
14	Pg. 103, last para	At the same time, demand for residential real estate is both flexible and strong, particularly in good economic times and over the long run. It can be, and is currently, constrained to an uncharacteristic degree, thanks to havoc in the financial markets the last few years and the drastic fall off in economic activity globally and nationally.	This characterization of the economy and housing market on Kauai is no longer accurate. Data is dated.
15	Pg. 108, para.4, line 1	The majority of the island's roughly 52,000 residents live and work in the coastal areas leaving the interior of Kaua'i natural and pristine.	This data point is part of a 2019 Housing Market Study for Kauai and the number is quite a bit off. The population of Kauai is currently 71,780 residents. Without the correct base number, housing number projections will be off proportionate to the difference.
16	Pg. 109, para 3-5 (comment	By way of context, housing construction hit a peak on Kaua'i when major resorts were developed in the 1970s; recent high-volume years reach only half that	It is not clear in the FEIS whether "30% of the condo sales went to out of state buyers" applies to the 1970s population numbers or tour current population numbers. In fact, the 2018 Kauai General Plan

	also applies to page 114)	<p>level. Thereafter, many of the condominium Projects that were developed targeted the offshore buyer market. Sales records show that upwards of 30% of the condo sales went to out of state buyers.</p> <p>Census records have shown that a quarter of the County's housing stock did not house residents. Thus, while the Census categorizes these units as "vacant," they may be actually rented to vacationers, reserved by owners as a second home, or both.</p> <p>Demand in the housing market hence comes from residents, investors and non-residents.</p>	states that: "Between January 2008 and September 2015, 45% of homes sold were purchased by mainland and foreign buyers." In any case, this would seem to indicate that if this ratio were applied to Hokua Place, the development would not be so much helping alleviate the housing crisis, but actually adding new residents (part or full time) to Kauai, putting further stress on our infrastructure, roads, traffic, etc.
17	Pg. 110, para 2, line 1 (comment also applies to page 114)	Development and construction of the Project facilities would generate employment and consequent tax revenues over several years.	This year the unemployment rate on Kauai has been hovering between 2.7-2.8%. The net result of that is when major construction projects occur on the island, labor has to be imported. Imported labor also puts a squeeze on local housing needs. Generating employment is not a great need on Kauai.
18	Pg. 111, para 8, lines 3-7 (comment also applies to page 114)	<p>The Kapa'a Middle School is adjacent and to the north of the HoKua Place Project. Kapa'a High School and Elementary School share a campus, which is located within 2-miles of the Property.</p> <p>Kapa'a Elementary School serves grades K-5 and has classroom capacity for 942 students (DOE). The 2018/2019 school year fall enrollment was 904.</p> <p>Kapa'a Middle School, has classroom capacity for 781 students, was opened in 1997 and had a fall enrollment for the 2018/2019 school year of 607 students.</p> <p>Kapa'a High School has a classroom capacity for 952 students and had a 2018/2019 fall enrollment of 1,083 students.</p>	<p>The data for the 2019-2020 school year shows different numbers, revealing that Kapaa Elementary School is at capacity (936 students), Kapaa High School is also just about at capacity (1041), and Kapaa Middle School has increased, but not at capacity (638).</p> <p>Additionally, teachers are leaving the state of Hawaii at a higher rate than before: of the 1,116 teachers who separated from the Hawaii Department of Education in 2017-18, <u>423 left for the mainland</u>, a 70% increase from five years prior.</p> <p>This has created more vacancies state-wide. <u>At the start of the 2018-19 school year</u>, there were 1,029 positions not occupied by a certified teacher, meaning those spots had to be filled by a substitute or an emergency hire — someone with a bachelor's degree but no teaching credential.</p>

		Note that Kapa'a Elementary and Middle schools have student enrollment significantly less than the capacity of each school.	
19	Pg. 113, para 6, lines 1-3 (comment also applies to page 116)	Affordable housing demands exhibited a significant upward trend over the last several years. Recent market studies have indicated a current shortage of single-family housing in the East Kaua'i area. The forecast is that demand for housing will continue to increase, especially in the area of affordable housing. The proposed Project will assist in alleviating some of the current supply-and-demand pressures on Kaua'i's current housing market by providing a variety of additional housing products and opportunities for long-term local residents.	<p>There is no assurance provided in the FEIS that the affordable housing units will actually be sold to those on Kauai who we qualify for affordable housing. Given the high level of off-island buyers as stated in the 2018 Kauai General Plan: "Between January 2008 and September 2015, 45% of homes sold were purchased by mainland and foreign buyers." , it is questionable who will actually end up with these units.</p> <p>Secondly, and in connection to the second point, what will keep the "affordable housing" buyers from re-selling these units at market rates with a net result of an actual decline in the affordable housing inventory over time.</p>
20	Pg. 116, para 4, lines 1-2	Kapa'a Bypass Road is a two-lane, two-way roadway along the southern and eastern boundaries of the Project. This section of Kapa'a Bypass Road is owned by the HoKua Place developer, who has entered a memorandum of understanding with State of Hawai'i Department of Transportation to dedicate the roadway to the State upon approval of the HoKua Place subdivision.	This statement is misleading as the Bypass Road simply crosses the Hokuia Place property and the road is not owned by HP. This was actually clarified for the first time earlier in this document. The language should be consistent.
21	Pg. 116, para 4, line 1	According to State of Hawai'i Department of Transportation traffic count data from 2010, Kapa'a Bypass Road has a weekday traffic volume of 7,400 vehicles per day.	This data set is obsolete due to the age of the data. Given that the population data is so off (see comment #15), then correspondingly so will the traffic data. In addition to the population data, in 2010 visitor numbers were 955,112; and for 2018 1,388,302. There needs to be accounting for how that translates into additional (rental) cars on the road.
22	Pg. 117, para 4-6	Accordingly, the study area was defined to include the intersection of Kapa'a Bypass Road at Olohena Road and the intersections providing access to and egress from Phase 2 of the Project (Kapa'a Bypass	In fact, this study need to be expanded all the way to Kuamo'o Road as the impacts from additional cars generated as a result of the Hokuia Place development will create further impacts to that geographic extent. For those of us who have endured the "Kapaa traffic crawl" it

		<p>Road at Road 'A' and Olohena Road at Road 'A'). Phase 1 lots are serviced by individual driveways which will have negligible traffic volumes.</p> <p>State of Hawai'i Department of Transportation reviewed the first draft of the report and directed that the study area be expanded to include the intersections of Kūhiō Highway at Kukui Street and Kūhiō Highway at Kapa'a Bypass.</p> <p>The County of Kaua'i directed that the intersection of Olohena Road at Kaapuni Road and Kaehulua Road be included in the study area.</p>	<p>use to occur during morning and afternoon rush hours. However, "the crawl" has now been extended to almost anytime (and often all the time) between approximately 7 am to 8pm, 7 days a week. Add to this the 3-4 new developments (see comments # 10,11,12) and the increasing visitor number (see comment #21) and the net result will be that residents can't get to work or deliver their children to school and visitors will spend their holidays sitting in traffic.</p>
23	Pg. 120, para 2, lines 2-3	<p>On Kauai DOT has selected the widening of Kuhio Highway from Kupule Highway to Wailua as the priority project on Kauai. DOT anticipates advertising for bids for this project in July 2020. <u>This project will indirectly benefit HoKua Place by increasing the capacity of Kuhio Highway from Wailua to Lihue</u>, the principle center of business and government on the island.</p>	<p>Making it easier for Hokua Place residents should not be the objective, but rather finding a way to alleviate the traffic burden for all the residents of the east side should be the focus of this analysis.</p>
24	Pg. 120, para 5, line 1	<p>Since the preparation of the DEIS traffic study, the peak hour traffic at the roundabout intersection of the Kapa'a Bypass Road and Olohena Road increased by about 12 percent and 22 percent, during the AM and PM peak hours of traffic, respectively.</p>	
25	Pg. 120-121 Final paragraph	<p>The construction of the connector roadway through HoKua Place, between Olohena Road and the Kapa'a Bypass Road, is expected to mitigate the Project's traffic impacts at the roundabout intersection of the Kapa'a</p>	<p>What is not clear is whether this connector roadway will be open to the public, or just for residents? In any case, although the round about does occasionally get backed-up at the north entry point, it is actually the one traffic tool that works well. The real problem is on the highway itself, and in particular where the Bypass Road enters the highway on the south end. More residents in the area = more</p>

			congestion at that clog point (one of several clog points).
26	Pg. 121, para 1-2	<p>Recommendations Without Project</p> <ol style="list-style-type: none"> 1. Widen Kuhio Highway between the Kapa`a Bypass Road (South Junction) and Kuamoo Road to provide two through lanes in each direction. 2. Restripe the median on the north leg of Kuhio Highway at the Kapa`a Bypass Road (South Junction) to provide a median refuge lane. 3. Restripe parking and shoulder lanes on Kuhio Highway through Kapa`a Town to provide additional through and/or left-turn lanes. 4. Modify the traffic signal operations at the intersection of Kuhio Highway and Kukui Street to reduce queuing and delays. 5. Add a right-turn bypass lane from southbound Kapa`a Bypass Road to mauka bound Olohena Road at their roundabout intersection. 6. Realign Kaehulua Road to intersect Olohena Road and Kaapuni Road to create a four-legged, channelized intersection. 7. Extend the median refuge lane/two-way left-turn lane on the north leg of Kuhio Highway at Lehua Street. <p>Recommendations With Project</p> <ol style="list-style-type: none"> 1. Construct Road A from Olohena Road to the Kapa`a Bypass Road. 2. Construct a roundabout at the intersection of 	<p>Not clear why these recommendations are in here as they are not relevant to the analysis, they serve as more of a wish list. This should be removed and not considered in the "Conclusions" section on page 121. There are additional "wish list" ideas included in the "conclusions" section which is confusing to the analysis.</p>

		Road A and the Kapa`a Bypass Road	
27	Pgs. 123-124	Entire sections on "Existing AM Peak Hour Traffic" and "Existing PM Peak Hour Traffic"	It would be much for useful in this section to illustrate how "volume per hour" actually translates into the amount of time it takes to travel one mile during peak hour traffic. That would provide a clearer description of the actual traffic situation. Also, it is important to note that the traffic jams are no longer restricted to the peak hours (7:15-8:15) and (3:00-6:00), but rather occur throughout the day and into the evening.
28	Pgs. 125-126, last para and first table	The existing peak hour traffic data were adjusted for the daily and seasonal variation in traffic in the region. The adjustment factors were based upon the 2016 traffic count data, which were collected at DOT's continuous traffic count station at Mile Post 2.4 on Kuhio Highway (Route 56) in Hanamaulu, which is located about 6 miles south of Kapa`a Town.	It is not clear in this text or the following table (pg. 126) what is taken into consideration when adjusting for "daily and seasonal variation in traffic". From first hand knowledge (and common knowledge of the community), we no longer have "off season" in which there is a marked decrease in visitor numbers. This changing visitor pattern needs to be considered in that now there s probably less "variation" than in previous years in terms of visitor numbers from one month to the next.
29	Pg. 126, para 2, line 1	DOT is presently planning to commence construction of the widening of Kuhio Highway in 2019. DOT has solicited bids from contractors for this Project. The widening of Kuhio Highway from the Kapa`a Bypass Road to Kuamoo Road would significantly improve traffic congestion in the Kapa`a corridor and is included in this traffic impact analysis.	Since it is December 2019 and there is no evidence of this happening, perhaps this should be updated. Please note that since 2009 we have been hearing about the widening of this section of the highway, with no action to date.
30	Pgs. 126-128	The Kapa`a Transportation Solutions (KTS) was prepared for the State Department of Transportation, dated August 2015. The KTS cited traffic congestion in the downtown/historic district of Kapa`a Town, which resulted from on-street parking in the curb lanes in both directions on Kuhio Highway. In addition, to the delays caused by vehicles maneuvering into and out	These are labeled as "Potential Traffic Solutions" on pgs. 126-127, however, they are just that and should not be considered in the traffic analysis. When reading the details of these "Potential Traffic Solutions" many of them are falsely attributed to as the problem, and the solutions are not viable. Looking at the example in the matrix box to the left, it is pretty clear when one drives through Kapaa that the parallel parking of vehicles in even a contributing part of the traffic problem. Additionally, if curbside parking were removed, then there would be no parking available in Kapaa that allows for even

		of the parallel parking stalls along Kuhio Highway, the on-street parking occupies valuable highway space, which could otherwise provide additional through traffic lanes and/or median left-turn lanes.	somewhat easy access to the businesses along the highway. And, no alternative parking plan has been offered up. This should be removed from the FEIS as it should not be considered in the analysis. There are 17 of these suggestions, few to none of which will make any difference in traffic flow through Kapaa. It is simply a matter of too many cars for the existing road system.
31	Pgs. 131-133	The following traffic improvements expand upon the potential traffic solutions, which were cited in the Kapa`a Transportation Solutions, and are recommended to mitigate the existing and expected traffic congestion without the proposed Project: <i>(these continue for 3 pages and lead up to the "Conclusions" (pg. 132) and "Level of Impact after Mitigation" (pg. 133)).</i>	The "Conclusions" and "Level of Impact" are largely based on recommendations for what the state and county should do to alleviate traffic congestion. That is not a valid basis for the findings in this report.
32	Pg. 135	In a September 6, 2007 email to HoKua Place, Curt K. Tadani, Eastside Distribution Planner for KIUC wrote, "I got your message and the plans that you brought in were already approved and signed off by us on June 27, 2005 so as far as we're concerned, it should be okay".	It is not clear what KIUC is signing off on. The scope of the project, including the amount of acreage, number of units and types of units has changes at least 4 times since 2007. Perhaps KIUC should review the latest plans before this kind of declaration is made in the FEIS.
33	Pg. 136, para 7-9	To reduce net energy consumption and demand, HoKua Place <u>will consider</u> the implementation of elements of the United States Environmental Protection Agency (EPA) Energy Star Program; including efficient insulation, high performance windows, compact construction, efficient ventilation systems, and energy efficient lighting elements and appliances. HoKua Place will <u>furthermore seek to</u> harness energy conservations and technologies to facilitate the possibility of net energy metering in building design to empower residents and tenants to reduce their	These read more like a possible wish list rather than an emphatic commitment to taking these actions. This is not helpful in the final analysis as the commitment to take these actions is not very strongly stated. This may be misrepresented when it comes to determining the "Level of Impact After Mitigation" (pg. 137).

		<p>electricity costs and provide energy back to the grid.</p> <p>Energy conservation and efficiency measures will be implemented and emphasized where applicable in the design of HoKua Place. Energy-efficiency technologies to be considered include: <i>(list of 9 actions)</i></p>	
34	Pg. 138, para 5	<p>A temporary increase in noise during construction is anticipated; however, this impact will be a minor, short term inconvenience and will be minimized by the limitations on the hours of construction activity and plans to reduce impacts of construction traffic.</p>	<p>No where in this analysis does it mention noise impacts on wildlife (e.g. Newell's Shearwaters).</p>
35	Pg. 148, para 1	<p>4.15 Secondary and Cumulative Impacts</p> <p>The proposed Project does not appear to have the potential to involve any significant secondary impacts. While there are anticipated changes in several environmental and social categories, as noted above, <u>these are anticipated and the result of implementation of the County's General Plan.</u></p>	<p>The Kauai General Plan is a policy-based guidance document, not an action plan, therefore there is no impact from the General Plan itself. If there were, that would have required an EIS, of which there was not one because there was no trigger.</p>