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NATIONS, KONA, INC.

BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Petition of

U of N BENCORP

To Amend the Agricultural Land Use District
to the Urban Land Use District for
Approximately 62 Acres, Tax Map Key Nos.:
(3) 7-5-010:085 and 7-5-017:006 situated at
Wai'aha, North Kona, County and State of
Hawaii'i

DOCKET NO. A02-737

**UNIVERSITY OF THE NATIONS,
KONA, INC.'S MOTION REQUESTING
THE LAND USE COMMISSION TO (A)
BE THE ACCEPTING AUTHORITY
FOR AN ENVIRONMENTAL IMPACT
STATEMENT AND (B) DETERMINE
THAT THE PROPOSED ACTION
WARRANTS THE PREPARATION OF
AN ENVIRONMENTAL IMPACT
STATEMENT, TO BE INITIATED
WITH THE PREPARATION OF AN
ENVIRONMENTAL IMPACT
STATEMENT PREPARATION
NOTICE; MEMORANDUM IN
SUPPORT OF MOTION; DECLARATION
OF DEREK B. SIMON; EXHIBIT "A";
CERTIFICATE OF SERVICE**

**UNIVERSITY OF THE NATIONS, KONA, INC.'S MOTION REQUESTING THE LAND
USE COMMISSION TO (A) BE THE ACCEPTING AUTHORITY FOR AN
ENVIRONMENTAL IMPACT STATEMENT, AND (B) DETERMINE THAT THE
PROPOSED ACTION WARRANTS THE PREPARATION OF AN ENVIRONMENTAL
IMPACT STATEMENT, TO BE INITIATED WITH THE PREPARATION OF AN
ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE**

University of the Nations Kona, Inc. ("UNK"), by and through its counsel, respectfully asks this honorable Land Use Commission of the State of Hawai'i (the "**Commission**") to determine: (a) that it will be the accepting authority for an environmental impact statement ("**EIS**") under Chapter 343, Hawaii Revised Statutes ("**HRS**"); and (b) through its judgment and experience, that an EIS is likely warranted and that the environmental review process should be initiated with the preparation of an Environmental Impact Statement Preparation Notice.

This Motion is brought pursuant to Chapter 205, HRS, Hawaii Administrative Rules ("**HAR**") § 15-15-70, HRS § 343-5(a)(1) & (e), and HAR §§ 11-200.1-7(c), 11-200.1-14(d)(2). UNK filed a *Motion to Amend Findings of Fact, Conclusions of Law, and Decision and Order* on March 23, 2020, which will remain pending until completion of the Chapter 343, HRS environmental review process.

Pursuant to HAR § 15-15-70(c), UNK respectfully requests that the Commission hold a hearing on this Motion at its meetings tentatively scheduled for February 10, 2021.

DATED: Honolulu, Hawai'i, January 21, 2021.



STEVEN S.C. LIM
KATHERINE A. GARSON
DEREK B. SIMON

Attorneys for
UNIVERSITY OF THE NATIONS, KONA,
INC.

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MEMORANDUM IN SUPPORT OF
MOTION

MEMORANDUM IN SUPPORT OF MOTION

I. INTRODUCTION

As more fully described in its *Motion to Amend Findings of Fact, Conclusions of Law, and Decision and Order*, filed March 23, 2020 ("**Motion to Amend**"), University of the Nations, Kona, Inc. ("**UNK**") has requested that the State of Hawaii Land Use Commission ("**Commission**") amend its *Findings of Fact, Conclusions of Law, and Decision and Order for a State Land Use District Boundary Amendment*, dated August 8, 2003 ("**D&O**"), to allow UNK to expand its existing campus located in Kona on the Island of Hawaii. The site of UNK's proposed expansion is immediately adjacent to its existing campus, at Tax Map Key Nos. (3) 7-5-010:085 and (3) 7-5-017:006 ("**Petition Area**"), which the Commission reclassified to the State Land Use Urban District under the D&O. UNK is seeking to expand its existing campus in order to accommodate its projected future growth.

However, before the Commission can take action on the Motion to Amend, UNK must first comply with Chapter 343, Hawaii Revised Statutes ("**HRS**"). Through this Motion, UNK is requesting the Commission to determine: (a) that it will be the accepting authority for UNK's environmental impact statement ("**EIS**") under Chapter 343; and (b) through its judgment and

experience, that an EIS is likely warranted and that the environmental review process should be initiated by preparation of an Environmental Impact Statement Preparation Notice ("**EISPN**").

II. DISCUSSION

A. ENVIRONMENTAL REVIEW TRIGGERED

In support of the Motion to Amend, UNK engaged Group 70 International, Inc. ("**G70**") to prepare, *inter alia*, an Infrastructural Conceptual Master Plan, dated June 2, 2020 ("**Infrastructure Master Plan**").¹ The purpose of the Infrastructure Master Plan was to set forth and prioritize the infrastructure improvements necessary to support UNK's proposed campus expansion on the Petition Area. The Infrastructure Master Plan revealed that UNK will need to install a new sewer connection under Kuakini Highway. The use of State or County land is a trigger requiring environmental review under Chapter 343. *See* HRS § 343-5(a)(1). Therefore, before the Commission can take action on the Motion to Amend, UNK must first comply with Chapter 343.

B. HRS CHAPTER 343 PROCESS & ACT 172 (2012)

Often the Chapter 343 environmental review process begins with the preparation of an environmental assessment ("**EA**")² and concludes in one of two ways. "If the . . . approving agency determines that a proposed action is not likely to have a significant effect, it shall issue a notice" of "finding of no significant impact" or "FONSI" and direct the applicant to file the FONSI and its final EA with the State of Hawaii Department of Health, Office of Environmental Quality Control ("**OEQC**"). *See* HAR § 11-200.1-22(b) & (d). If, on the other hand, "the . . . approving agency determines that a proposed action may have a significant effect" on the

¹ The Infrastructure Master Plan was filed with the Commission on June 23, 2020, with UNK's *First Supplemental Memorandum in Support of Motion to Amend Findings of Fact, Conclusions of Law, and Decision and Order*.

² An EA is "a written evaluation that serves to provide sufficient evidence and analysis to determine whether an action may have a significant effect." *See* HAR § 11-200.1-2.

environment, it instructs the applicant to prepare an EISPN and complete the environmental review process through the preparation and processing of an EIS. *See* HAR § 11-200.1-22(c).

However, as a result of the Hawai'i State Legislature's passage of Act 172 in 2012, an accepting authority may authorize an applicant to proceed directly to the preparation of an EISPN in cases where the agency determines, through its judgment and experience, that an EIS is likely to be required. As set forth in its preamble, the purpose of Act 172 is:

to allow agencies to determine, based on their judgment and experience, that an environmental impact statement is likely to be required for a proposed action, and, therefore, choose not to prepare an environmental assessment or to allow an applicant not to prepare an environmental assessment, and instead proceed directly to the preparation of an environmental impact statement.

HRS § 343-5(3)(e) provides, in pertinent part, that:

if the agency determines, through its judgment and experience, that an environmental impact statement is likely to be required, the agency may choose not to prepare an environmental assessment and instead shall prepare an environmental impact statement that begins with the preparation of an environmental impact statement preparation notice as provided by rules.

More recently, Act 172 and HRS § 343-5(3)(e) were codified into OEQC's new Chapter 343 implementing regulations:

If the . . . approving agency determines, through its judgment and experience that the action is not eligible for an exemption, then the proposing agency shall prepare, or the approving agency shall require the applicant to prepare, an EA beginning with a draft EA in accordance with subchapter 9, unless:

...
(2) The proposing agency or approving agency determines, through its judgment and experience that an EIS is likely to be required, then the proposing agency may choose to prepare, or an approving agency may authorize an applicant to prepare, an EIS in accordance with subchapter 10, beginning with preparation of an EISPN.

HAR § 11-200.1-14 (d) (emphasis added).

C. SIGNIFICANCE CRITERIA

An EIS is required when the approving agency or accepting authority determines that the

proposed action may have a significant effect on the environment. A determination of whether a proposed action may have a significant effect on the environment requires an agency to review the significance criteria under HAR § 11-200.1-13(b). In most instances, a proposed action will be determined to have a significant effect on the environment if it is anticipated to cause one or more of the following:

- (1) Irrevocably commit a natural, cultural, or historic resource;
- (2) Curtail the range of beneficial uses of the environment;
- (3) Conflict with the State's environmental policies or long-term environmental goals established by law;
- (4) Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;
- (5) Have a substantial adverse effect on public health;
- (6) Involve adverse secondary impacts, such as population changes or effects on public facilities;
- (7) Involve a substantial degradation of environmental quality;
- (8) Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;
- (9) Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;
- (10) Have a substantial adverse effect on air or water quality or ambient noise levels;
- (11) Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;
- (12) Have a substantial adverse effect on scenic vistas and viewplanes, during day or night, identified in county or state plans or studies; or
- (13) Require substantial energy consumption or emit substantial greenhouse gases.

HAR § 11-200.1-13(b).

UNK is pursuing a 30-year, three-phase expansion of its existing campus in order to accommodate its projected future growth. UNK's current enrollment is 840 students per quarter and its full-time equivalent ("FTE") staff is approximately 252. For Phase I, covering the first 5-10 years, UNK's enrollment is projected to increase to 1,500 students and its FTE staff is projected to increase to approximately 450. For Phase II, covering the next 10 years, UNK's enrollment is projected to increase to 2,250 students and its FTE staff is projected to increase to approximately 675. For Phase III, covering the final 10 years, UNK's enrollment is projected to increase to 3,000 students and its FTE staff is projected to increase to approximately 900.

Given these projected increases in student enrollment and FTE staff, UNK's proposed campus expansion could result in secondary impacts, such as population changes or effects on public facilities. *See* HAR § 11-200.1-13(b)(6). Therefore, there is a likelihood that an EIS may be required and the Commission should authorize UNK to proceed directly to the preparation of an EISPN, without first preparing and processing an EA.

D. CONTENT AND PUBLICATION REQUIREMENTS FOR AN EISPN

HAR 11-200.1-23(a) sets forth the following content requirements for all EISPNs, "including [EISPNs] resulting from an agency authorizing the preparation of an EIS without first requiring an EA":

- (1) Identification of the proposing agency or applicant;
- (2) Identification of the accepting authority;
- (3) List of all required permits and approvals (state, federal, and county) and, for applicants, identification of which approval necessitates chapter 343, HRS, environmental review;
- (4) The determination to prepare an EIS;
- (5) Reasons supporting the determination to prepare an EIS;
- (6) A description of the proposed action and its location;
- (7) A description of the affected environment, including regional, location, and site maps;
- (8) Possible alternatives to the proposed action;
- (9) The proposing agency's or applicant's proposed scoping process, including when and where any EIS public scoping meeting will be held; and

(10) The name, title, email address, physical address, and phone number of an individual representative of the proposing agency or applicant who may be contacted for further information.

HAR § 11-200.1-23(a). A copy of UNK's draft EISPN is attached hereto as **Exhibit "A"**.

Should the Commission grant this Motion and agree that it is the appropriate accepting authority, the EISPN will be submitted to OEQC and published in *The Environmental Notice*. Publication of the EISPN will start a 30-day public review and comment period, within which agencies, groups, and individuals will have an opportunity to make written comments regarding environmental effects of UNK's proposed campus expansion. *See* HAR § 11-200.1-23(c). UNK will respond to all substantive comments (defined as those pertaining to the scope of the EIS), and all comments and UNK's responses will be included in UNK's Draft EIS. *See id.*

III. CONCLUSION

UNK respectfully requests that this Commission: (a) agree to be the accepting authority to determine the acceptability of the EIS that UNK will prepare to assess the environmental effects of the development of the Petition Area as set forth in the Motion to Amend; and (b) direct Petitioner to initiate the environmental review process by proceeding directly to the preparation of an EISPN rather than an EA, because, in the Commission's judgment and experience, the proposed development of the Petition Area, if authorized, may have a significant effect on the environment.

DATED: Honolulu, Hawai'i, January 21, 2021.



STEVEN S.C. LIM
KATHERINE A. GARSON
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Wai'aha, North Kona, County and State of
Hawaii'i

DOCKET NO. A02-737

DECLARATION OF DEREK B. SIMON

DECLARATION OF DEREK B. SIMON

I, Derek B. Simon, declare as follows:

1. I am an attorney with the law firm of Carlsmith Ball LLP, attorneys for University of the Nations, Kona, Inc. ("UNK").
2. Attached hereto as Exhibit "A" is a true and correct copy of a draft of the Environmental Impact Statement Preparation Notice for UNK's 2020 Master Plan Update, dated December 2020.

I declare under penalty of perjury that the foregoing is true and correct.


Derek B. Simon

UNIVERSITY OF THE NATIONS, KONA, INC. 2020 MASTER PLAN UPDATE

ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE



APPLICANT:



University of the Nations, Kona, Inc.
75-5851 Kuakini Highway
Kailua-Kona, HI 96740

PREPARED BY:



111 S. King Street, Suite 170
Honolulu, Hawai'i 96813

DECEMBER 2020

EXHIBIT A

UNIVERSITY OF THE NATIONS, KONA, INC. 2020 MASTER PLAN UPDATE

Kailua-Kona, Island of Hawai'i, Hawai'i

TMK (3) 7-5-010:085 and (3) 7-5-017:006

ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

APPLICANT:



University of the Nations, Kona, Inc.
75-5851 Kuakini Highway
Kailua-Kona, HI 96740

PREPARED BY:



111 S. King Street, Suite 170
Honolulu, Hawai'i 96813

This environmental document was prepared pursuant to Hawai'i Revised Statutes, Chapter 343,
Environmental Impact Statement Law and Hawai'i Administration Rules, Chapter 11-200.1,
Environmental Impact Statement Rules.

DECEMBER 2020

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List of Acronyms

| | |
|------------------|--|
| AA | Archaeological Assessment |
| AIS | Archaeological Inventory Survey |
| ALISH | Agricultural Lands of Importance to the State of Hawai'i |
| ASM | ASM Affiliates, Incorporated |
| ASYA | Aquifer System Area |
| BMPs | Best Management Practices |
| CAB | Clean Air Branch |
| CDP | Census Designated Place |
| CO | Carbon Monoxide |
| CIA | Cultural Impact Assessment |
| CZMP | Coastal Zone Management Program, State of Hawai'i |
| DBEDT | Department of Business, Economic Development and Tourism, State of Hawai'i |
| DLNR | Department of Land and Natural Resources, State of Hawai'i |
| DOE | Department of Education, State of Hawai'i |
| DOFAW | Department of Forestry and Wildlife, State of Hawai'i |
| DOH | Department of Health, State of Hawai'i |
| DPW | Department of Public Works, County of Hawai'i |
| DWS | Department of Water Supply, County of Hawai'i |
| EIS | Environmental Impact Statement |
| EISPN | Environmental Impact Statement Preparation Notice |
| EMS | Emergency Medical Services |
| EPA | U.S. Environmental Protection Agency |
| EPR | Environmental Planning Report |
| FEMA | Federal Emergency Management Area |
| FTE | Full-Time Equivalent |
| GPD | Gallons per Day |
| HAR | Hawai'i Administrative Rules |
| HCFD | Hawai'i County Fire Department |
| HDOT | Hawai'i Department of Transportation, State of Hawai'i |
| HE | Hawaiian Electric |
| HEPA | Hawai'i's Environmental Protection Act |
| HIBC | Hawai'i Island Burial Council |
| HRS | Hawai'i Revised Statutes |
| HTCO | Hawaiian Tel |
| HWUDP | Hawai'i County Water Use and Development Plan |
| H ₂ S | Hydrogen Sulfide |
| IBC | International Building Code |
| KS | Kamehameha Schools |
| Kv | Kilovolt |
| LEED | Leadership in Energy and Environmental Design |
| LID | Low Impact Development |
| LOS | Level of Service |
| LSB | Land Study Bureau, University of Hawai'i |
| LUC | Land Use Commission, State of Hawai'i |
| LUPAG | Land Use Pattern Allocation Guide |
| MAR | Mobility Analysis Report |
| MGD | Million Gallons per Day |

| | |
|----------------|---|
| MPH | Miles per Hour |
| NAAQS | National Ambient Air Quality Standards |
| NPDES | National Pollutant Discharge Elimination System |
| NPS | National Park Service |
| NRCS | National Resource Conservation Sciences |
| NRHP | National Register of Historic Places |
| NOX | Nitrogen Oxides |
| OEQC | Office of Environmental Quality Control, State of Hawai'i |
| OHA | Office of Hawaiian Affairs, State of Hawai'i |
| OP | Office of Planning, State of Hawai'i |
| O3 | Ozone |
| Pb | Lead |
| PM2.5 | Particulate Matter Smaller than 2.5 Microns |
| PM10 | Particulate Matter Smaller than 10 Microns |
| Petition Area | 62-acres of Land Purchased by University of the Nations, Kona, Inc. |
| PUC | Public Utility Commission, State |
| SDWB | Safe Drinking Water Branch, State Department of Health |
| SMA | Special Management Area |
| SKR | South Kohala Resort |
| SAAQS | State Ambient Air Quality Standards |
| SHPD | State Historic Preservation District |
| SIHP | State Inventory of Historic Places |
| SLU | State Land Use District Boundary Amendment |
| Sox | Sulfur Oxides |
| So2 | Sulfur Dioxide |
| TMK | Tax Map Key |
| TOD | Transit Oriented Development |
| TPD | Tons per Day |
| T&C | Traditional and Customary Native Hawaiian Rights |
| U of N Bencorp | University of the Nations, Bencorp, Inc. |
| U of N Kona | University of the Nations, Kona, Inc. |
| UNK Update | University of the Nations, Kona 2020 Master Plan Update |
| USDA | United States Department of Agriculture |
| USFWS | United States Fish and Wildlife Services |
| USGS | United States Geological Survey |
| V | Volt |
| WWTP | Wastewater Treatment Plant |

1.0 Introduction

This Environmental Impact Statement Preparation Notice (EISPN) was prepared in accordance with the requirements of Hawai'i Revised Statutes, Chapter 343 and Hawai'i Administrative Rules, Chapter 11-200.1 in support of a Motion to Amend the Findings of Fact, Conclusions of Law, and Decision and Order for a State Land Use District Boundary Amendment filed in the State of Hawai'i Land Use Commission (LUC) Docket No. A02-737 in order to revise the land use plan and development proposal for approximately 62 acres of land in Kailua-Kona, North Kona District, County and Island of Hawai'i. This environmental review is required due to the project's proposed use of County of Hawai'i lands associated with infrastructure improvements within public roadways.

1.1 Project Information Summary

| | |
|--|--|
| Name of Action: | University of the Nations, Kona, Inc. 2020 Master Plan Update |
| Applicant/Landowner: | University of the Nations, Kona, Inc. 75-5851 Kuakini Highway Kailua-Kona, HI 96740 |
| Accepting Authority: | Hawai'i State Land Use Commission P.O. Box 2359 Honolulu, HI 96813 |
| Prepared By: | G70 111 S. King St., Suite 170 Honolulu, HI 96813 Contact: Jeff Overton, Principal Phone: (808) 523-5866 |
| Project Location: | University of the Nations, Kona, Inc. 75-5943 & 75-5911 Kuakini Highway Kailua-Kona, HI 96740 |
| Tax Map Keys (TMK): | (3) 7-5-010:085 and (3) 7-5-017:006 |
| Project Area: | 62-acres |
| State Land Use District: | Urban (Reclassified from Agricultural to Urban in 2003) |
| County of Hawai'i Zoning: | TMK (3) 7-5-010:085, A-1a, Agricultural District TMK (3) 7-5-017:006, RD-3.75 and RS-7.5, Residential District |
| County of Hawai'i General Plan: | Medium Density Urban Development |
| Special Management Area: | Not Within SMA |
| Flood Zone: | Zone X (Outside 500-year Floodplain) |
| EISPN Triggers: | Use of County Lands, Utility and Infrastructure Improvements |

1.2 Project Background

University of the Nations, Kona, Inc. (U of N Kona), a Hawai'i 501(c)(3) non-profit corporation and mission-based educational institution, was founded in 1978 at its present campus (Existing Campus Site) in Kailua-Kona on the Island of Hawai'i. U of N Kona serves as a training center to prepare followers for Christian service throughout the world, with an emphasis in Asia and the Pacific. Unique in the field of higher education, this non-traditional, globally networked learning center offers learning opportunities for emerging Christian leaders with branches in 1,200 locations with programs in over 100 languages around the world.

In 2003, U of N Kona was granted a State Land Use (SLU) District Boundary Amendment in LUC Docket No. A02-737 to reclassify approximately 62 acres of land in Kailua-Kona, North Kona District, County and Island of Hawai'i, from the SLU Agricultural District to the SLU Urban District (Petition Area). U of N Kona has filed a Motion to Amend the Findings of Fact, Conclusions of Law, and Decision and Order for a State Land Use District Boundary Amendment filed on August 8, 2003 (Motion to Amend). The Motion to Amend was filed to revise the land use plan and development proposal for the Petition Area described herein and defined as U of N Kona's 2020 Master Plan Update (UNK Update).

The UNK Update provides for the expansion of the existing campus over approximately 30 years, in three (3) phases of development to accommodate the U of N Kona's projected future growth. Fully developed, the proposed expansion of the campus would generally include a K-12 school with supporting facilities, additional instructional buildings for the existing Discipleship Learning Center, student dormitories, a chapel, a student resource center, a discovery center for research and documentation, a café with outdoor dining space, an athletic training complex, a youth camp, an agricultural exhibit, and supportive facilities. The proposed UNK Update reflects current and upcoming priorities, outlines the expansion of the existing campus onto the Petition Area, and builds on planning principles and concepts based on the mission's faith-based system.

1.3 Project Location

The Petition Area is located on the west coast of the Island of Hawai'i, approximately one mile southeast of the town center of Kailua-Kona, in the North Kona District (*Figure 1-1*). The Petition Area is within the traditional moku of Kona and ahupua'a of Wai'aha 1st on the lower western slopes of Mount Hualālai. The Petition Area is approximately 62 acres in size and presently identified by Tax Map Key Nos.: (3) 7-5-010:085 and 7-5-017:006 (*Figure 1-2*).

The Petition Area is bordered by Kuakini Highway on the west, Queen Ka'ahumanu Highway and Hualālai Road on the east, U of N Kona's Existing Campus Site to the north, and the Kona Hillcrest subdivision on the south. The Petition Area is generally gently sloped at an elevation ranging from approximately 100 to 360 feet, rising in elevation from approximately 100 feet at Kuakini Highway to 360 feet with steeper slopes on the upper mauka side just below Hualālai Road. The parcels in the vicinity of the Petition Area are classified in the SLU Urban District.



Figure 1-1: Project Location Map

University of the Nations, Kona, Inc. 2020 Master Plan Update



Figure 1-2: TMK Parcel Map

University of the Nations, Kona, Inc. 2020 Master Plan Update

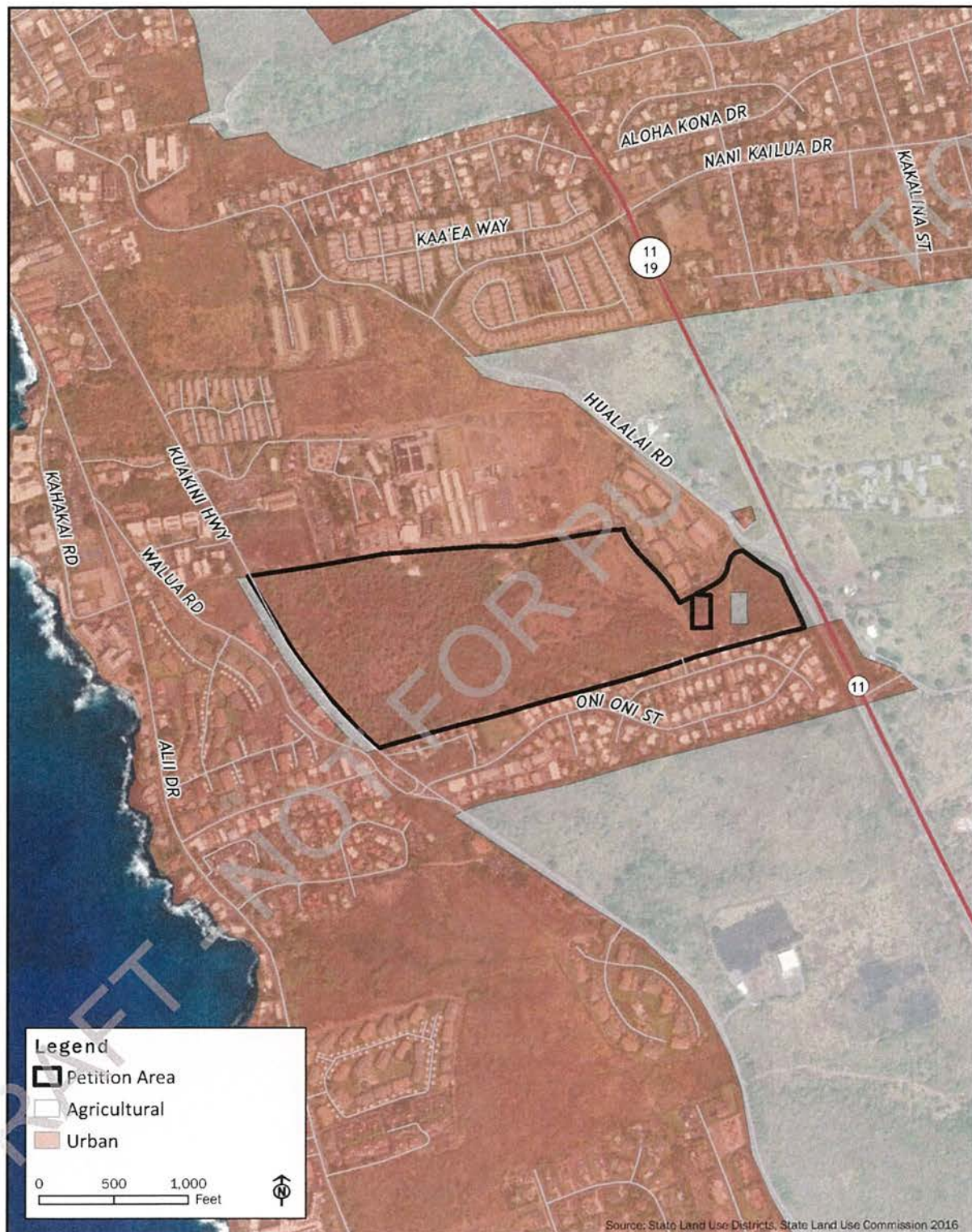


Figure 1-3: State Land Use District Designation Map

University of the Nations, Kona, Inc. 2020 Master Plan Update



Figure 1-4: County of Hawai'i Zoning Map

University of the Nations, Kona, Inc. 2020 Master Plan Update

2.0 Project Description

2.1 Proposed Action

The UNK Update builds on planning principles and concepts based on the U of N Kona's faith-based value system. Its purpose is to update the plan for the 62-acre Petition Area to reflect current and upcoming priorities and to outline the expansion of the Existing Campus Site. Future buildings and projects are projected over a 30-year planning program, in three (3) phases with 5-10-years allocated for each development phase (*Table 2-1*).

| Table 2-1: Planning Program, UNK Update | |
|---|--|
| Phase 1: 5-10 Years | Planning program projects anticipated for development with the next 5-10 years. |
| Phase 2: Beyond 10 Years | Planning program projects anticipated for development beyond the 10-year period. |
| Phase 3: Beyond 20 Years | Planning program projects anticipated for development beyond the 20-year period. |

The UNK Update sets current and upcoming mission-based learning priorities, including a physical vision of the campus and an expanded organizational schematic program that defines future uses of the site. The UNK Update separates the Petition Area into six distinct geographic areas: a discovery center, K-12 school, the Discipleship Learning Center, an athletic complex, an agricultural exhibit, and a storage and maintenance yard (*Figure 2-2*). The UNK Update illustrates the design considerations for projects within these areas. In addition, the UNK Update identifies key features to create an integrated campus community, such as entrances and arrival areas, a central gathering space at the chapel, outdoor courtyards and pathways, buildings, landscaping, preservation of archaeological sites, and sustainability and design guidelines to define the overall relationship of the Petition Area. Refer to *Figures 2-2a through 2-2d* and *Tables 2-2a through 2-2d* for lists of the proposed improvements.

Infrastructure improvements include expansion of the existing on-site center road (Spine Road) that bisects the Existing Campus and Petition Area, the addition of a secondary access point off of Kuakini Highway and necessary roadway improvements, and other upgrades to the existing utilities. All building projects will be designed and constructed to meet applicable codes and ordinance rules and regulations governing the construction of facilities. The necessary permits and approvals will be secured prior to the commencement of construction.

As a part of the entitlement process, in addition to the Motion to Amend, a change in zoning will need to be processed with the County to facilitate the UNK Update on the Petition Area. The Petition Area is currently zoned A-1a, Agricultural District and a portion of the Petition Area is split zoned RD-3.75 and RS-7.5, Residential District (*Figure 1-4*). A change in zoning application with the County would be required for approval from A-1a to RM-4 (Multiple-Family Residential) or possibly RCX (Residential-Commercial Mixed Use) or CV (Village Commercial) prior to plan approval(s) and issuance of building permits. U of N Kona is also considering establishing Project District zoning for the project, which would provide flexibility in relocating elements within the Project District.

2.2 Purpose and Need for the Proposed Action

The UNK Update addresses current and projected space and activity needs for U of N Kona. Enrollment is projected to increase over the next planning period, as indicated by U of N Kona. The proposed development is intended to expand the learning and training centers to support U of N Kona's mission.

Current enrollment is approximately 840 students per quarter. In addition to student enrollment, the number of full-time equivalent (FTE) staff is approximately 252. Currently, 90% of the students live on the site, totaling an estimated 756 student and 101 FTE staff residents. The de facto daytime population of the Existing Campus Site is about 1,092.

In the next 5-10 years, enrollment is projected to increase to 1,500 students. In addition to student enrollment, FTE staff numbers are projected to increase to approximately 450. An estimated 70% of the students are expected to live on the site, for a total of approximately 1,050 student residents over the Phase 1 Planning Program. In addition, an estimated 40% of the FTE staff are expected to live on the site, for a total of approximately 180 FTE staff residents over the Phase 1 Planning Program. The total residents for the Phase 1 Planning Program is projected to be 1,230 and the de facto daytime population is projected to be about 1,950 for the Existing Campus Site and the Petition Area. The Phase 1 Planning Program estimates the daytime population for the Petition Area only to be 630 of the total daytime population for the entire campus and approximately 200 of the total residents are expected to live on the Petition Area.

For Phase 2, enrollment is projected to increase the student population to approximately 2,250 students. In addition to student enrollment, the FTE staff numbers are projected to increase to approximately 675. A little more than 80% of the students are expected to live on the site, for a total of approximately 1,875 student residents over the Phase 2 Planning Program. In addition, an estimated 35% of the FTE staff are expected to live on site, for a total of approximately 236 FTE staff residents over the Phase 2 Planning Program. The total residents for the Phase 2 Planning Program is projected to be 2,111 and the de facto daytime population is projected to be about 2,925 for the Existing Campus Site and the Petition Area. The Phase 2 Planning Program estimates the daytime population for the Petition Area to be 1,095 of the total daytime population and approximately 1,100 of the total residents are expected to live on the Petition Area.

For Phase 3, enrollment is projected to increase the student population to approximately 3,000 students. In addition to student enrollment, FTE staff numbers are projected to increase to approximately 900. A little more than 80% of the students are expected to live on the site, for a total of approximately 2,500 student residents over the Phase 3 Planning Program. In addition, an estimated 30% of the FTE staff are expected to live on site, for a total of approximately 270 FTE staff residents over the Phase 3 Planning Program. The total residents for the Phase 3 Planning Program is projected to be 2,770 and the de facto daytime population is projected to be about 3,900 for the Existing Campus Site and the Petition Area. The Phase 3 Planning Program estimates the daytime population for the Petition Area to be 1,940 of the total daytime population and approximately 1,400 of the total residents are expected to live on the Petition Area. Only approximately 1,130 of these students and staff will be commuting, and the remaining students and staff will be accommodated to live on-site with the proposed student dormitories and faculty housing.

U of N Kona has been successful in establishing and growing its existing programs, such that the expansion of the campus onto the 62-acre Petition Area and proposed facilities and projects are necessary to support the growth of U of N Kona.

2.3 U of N Kona 2020 Master Plan Update Vision

Located within the ahupua'a of Wai'aha 1st on the lower western slopes of Mount Hualālai within the traditional moku of Kona, U of N Kona serves as a premier globally networked learning center to prepare followers for Christian service throughout the world. Wai'aha – which means “gathering water” in Hawaiian – reflects the ideas, hopes and dreams of what U of N Kona’s founders and representatives envisioned during the planning and design phases of the UNK Update. U of N Kona is envisioned as a place for coming together or “gathering” to broaden the scope of evangelistic endeavors and prepare followers for Christian service with spiritual, cultural, intellectual, and professional training.

The UNK Update is envisioned as a sustainable campus environment that provides a mission-based setting for its faculty and student population that incorporates the unique historical and cultural legacy specific to the Petition Area, Wai'aha Ahupua'a and the greater Kona Region. Preservation and restoration of significant cultural resources within the Petition Area are highlighted and interpreted as focal features in the design. A historical walk is planned, connecting the idea of “gathering water” to a landscape feature envisioned as a dry-stream bed. The proposed dry-stream bed is planned to begin at the Existing Campus Site, meander through the site and connect to the principal gathering area proposed for the Petition Area, the Chapel. The central gathering area at the Chapel is envisioned as the “Piko” of the campus. The design of the Chapel is encircled by a stepped water feature and complemented with a natural, terraced seating area for gathering, featuring views of the campus and Kona Coast.

The UNK Update prioritizes historical restoration of identified cultural sites at the Petition Area. The planned restoration includes installation of rock walls along permanent preservation easement buffers at each of the cultural sites, connecting pathways, and preservation of access and trails. To feature the historical significance of the sites, traditional Hawaiian Hale structures are designed to complement the historical restoration and interpretation of the cultural sites. Overall, the UNK Update incorporates guiding cultural principles in the physical design of the facilities and the surrounding landscape in the selection of appropriate plantings and exterior features.

The UNK Update includes guidelines to address building design, as well as guidelines for sustainability and landscape design. Strategically, the architectural design amends to the natural terrain of the topography, incorporating a natural integration with the Petition Area. A unified architectural theme is established to ensure that the buildings are scaled to reflect a distinct sense of place of the Kona Region.

Proposed buildings will be designed to be flexible and accommodate diverse space needs, creating an environment that comfortably supports innovative teaching, learning opportunities, and gathering venues. The UNK Update incorporates green building design using water saving features and energy saving features, such as photovoltaic panels and green roofs. In addition, the proposed landscaping integrates Hawaiian culture through the use of native plants and landscaping elements that are representative of the natural and cultural landscape. The landscape design will incorporate xeriscape techniques aimed at creating sustainable landscape that complements the dry climate, pays tribute to the region’s agricultural past, and incorporates planting of native vegetation.

Much of the proposed design for the Petition Area reflects and capitalizes upon the beauty of the surrounding Kona Region. The spaces between buildings are envisioned as either “outdoor rooms” functioning in concert with indoor spaces as venues for learning, gathering, recreation, or as outdoor corridors. Outdoor open spaces or “outdoor rooms” linked through a pedestrian network is envisioned to create outdoor learning environments that promote interaction between students and faculty. The UNK Update strives to embrace all elements of sustainability, and its architecture, open space, and landscape will work together to foster a Hawaiian sense of place that is also reflective of the Kona region, both its natural attributes and its cultural history.



Figure 2-1: Conceptual Rendering (G70, 2020)

University of the Nations, Kona, Inc. 2020 Master Plan Update

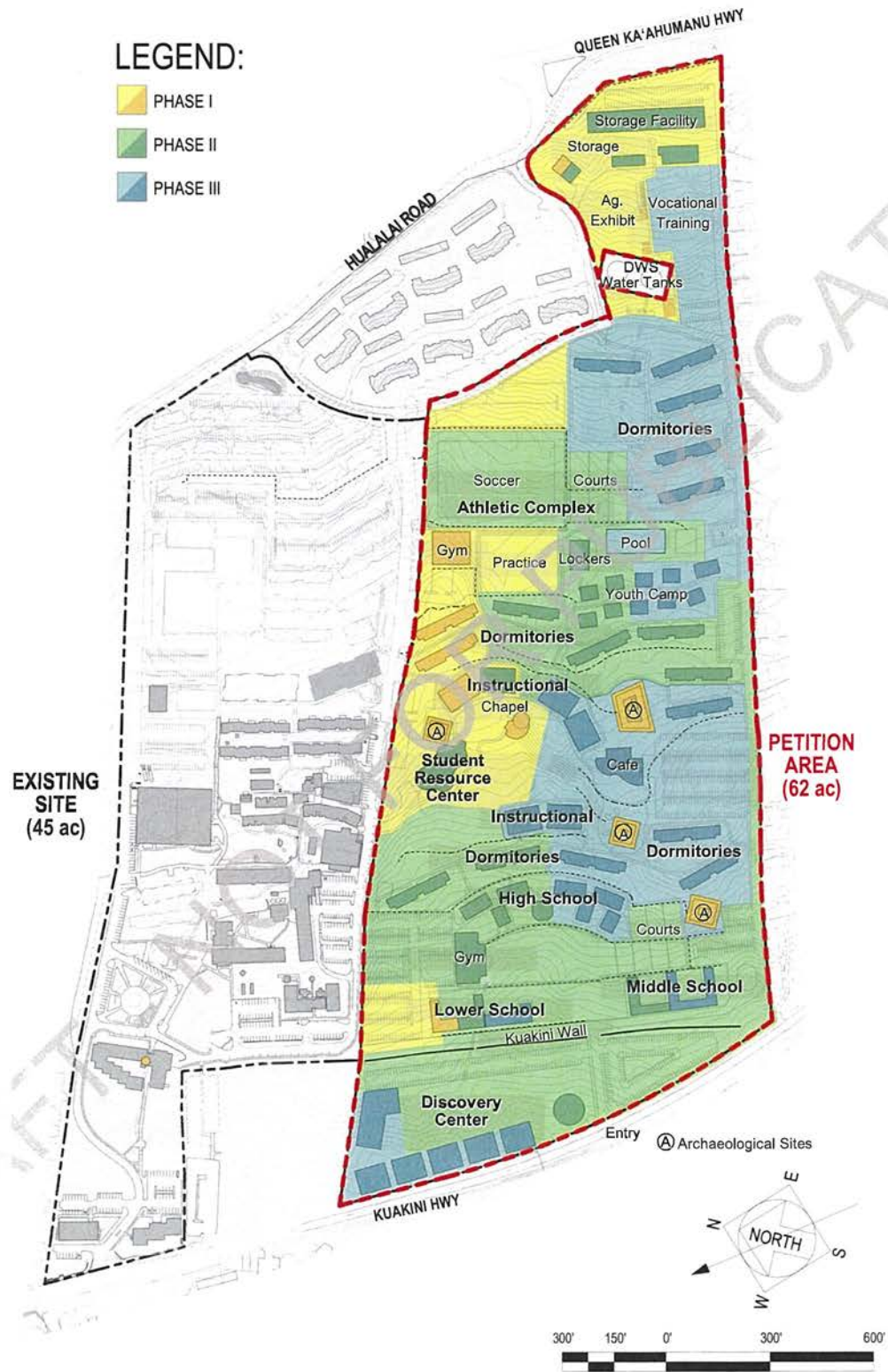


Figure 2-2: Conceptual Master Plan (G70, 2020)

University of the Nations, Kona, Inc. 2020 Master Plan Update

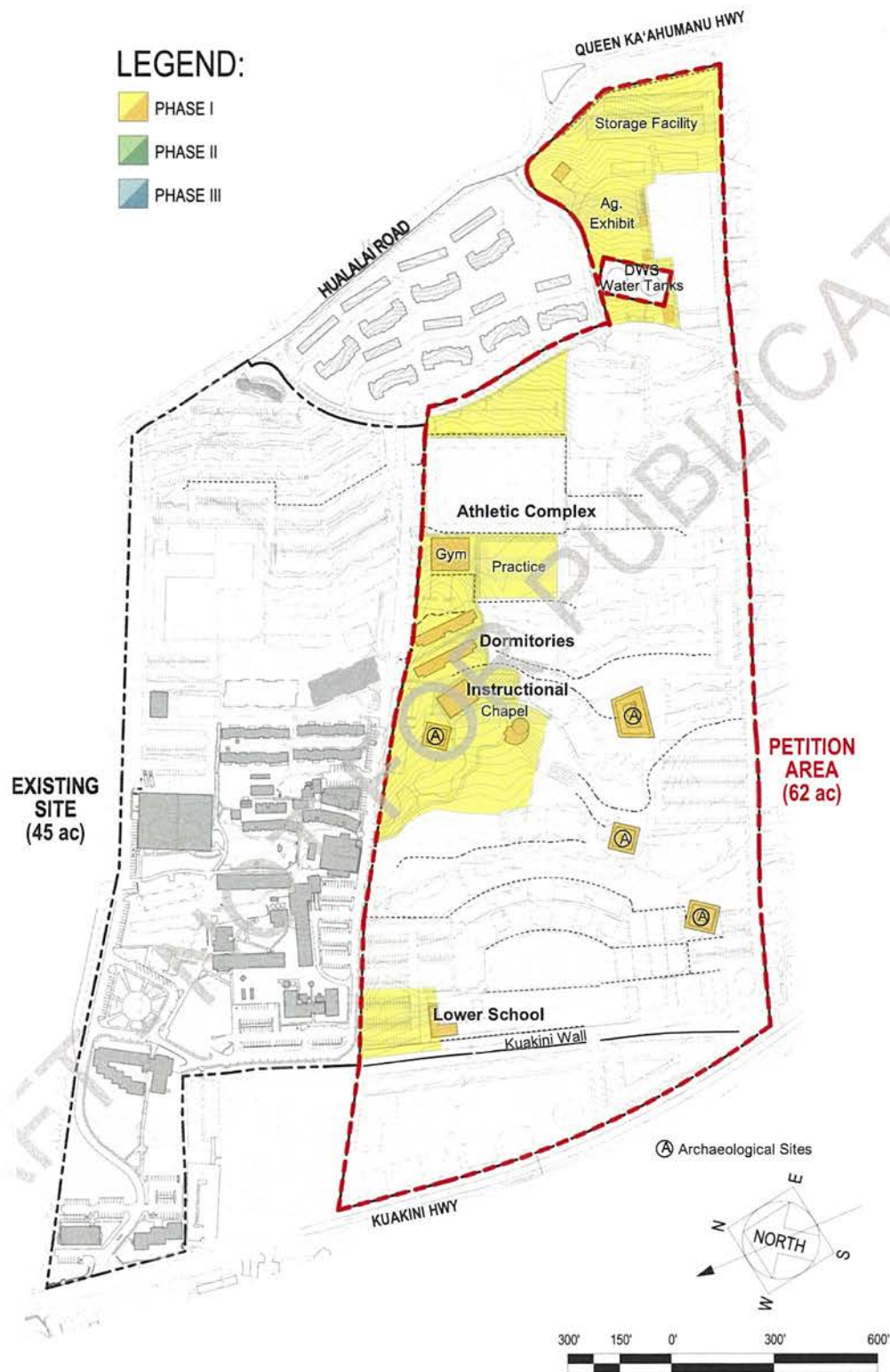


Figure 2-2a: Phase 1 - Proposed Projects for Petition Area

| Table 2-2a: Phase 1 - Proposed Projects for Petition Area | | |
|--|--------------------------|----------------|
| Petition Area Proposed Projects Phase 1 – Within 5-10 Years | Foot Print (SqFt) | Acreage |
| Discipleship Learning Center | | |
| Chapel | 4,010 | 0.1 |
| Instruction Building | 7,000 | 0.2 |
| Student Resident Dormitory Buildings (2) | 14,000 | 0.3 |
| Athletic/Training Complex | | |
| Gymnasium/Locker Rooms | 10,450 | 0.2 |
| Lower School | | |
| Instruction Building | 3,420 | 0.1 |
| Agricultural Exhibit | | |
| Instruction Building | 1,500 | 0.03 |
| Maintenance/Storage Facilities | | |
| Maintenance Shops/Storage Warehouse | 1,700 | 0.04 |
| SUBTOTAL BUILDING FOOTPRINT AREA | 42,080 | 1.0 |
| Roadway Connections to Existing Campus Site & Access Points | 3,000 | 0.1 |
| ADA Compliant Pathways | 21,040 | 0.5 |
| SUBTOTAL ROADWAY & PATHWAY AREA | 24,040 | 0.6 |
| Parking Area for Instruction & Dormitory Buildings | 31,000 | 0.7 |
| Parking Area for Gymnasium & Practice Field | 25,000 | 0.6 |
| Parking Area for Athletic/Training Complex | 33,500 | 0.8 |
| Parking/Drop-off Area for Lower School | 27,300 | 0.6 |
| Parking & Delivery/Loading Area for Storage Facilities | 33,200 | 0.8 |
| SUBTOTAL PARKING AREA | 150,000 | 3.4 |
| Athletic/Training Complex Practice Field | 37,150 | 0.9 |
| Agricultural Exhibit Garden & Food Forest | 61,500 | 1.4 |
| Archaeological Preservation Sites | 25,300 | 0.6 |
| Lawn Areas and Landscaping | 180,800 | 4.2 |
| SUBTOTAL OPEN SPACE/PERVIOUS AREA | 304,750 | 7.1 |
| TOTAL PHASE 1 AREA | 520,870 | 12 |

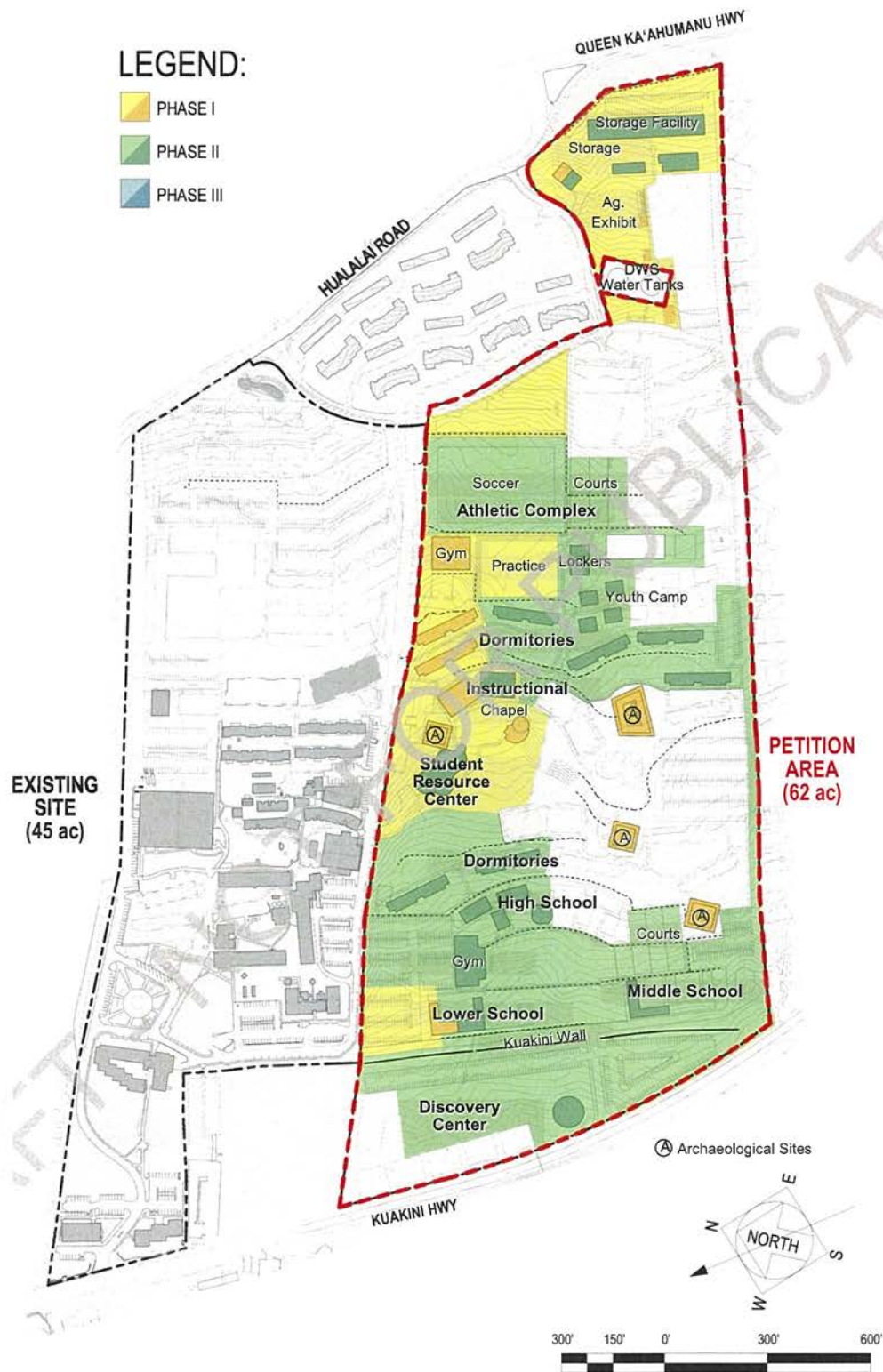


Figure 2-2b: Phase 2 - Proposed Projects for Petition Area

University of the Nations, Kona, Inc. 2020 Master Plan Update

| Table 2-2b: Phase 2 - Proposed Projects for Petition Area | | |
|--|--------------------------|----------------|
| Petition Area Proposed Projects Phase 2 – Beyond 10 Years | Foot Print (SqFt) | Acreage |
| Discipleship Learning Center | | |
| Student Resource Center | 12,300 | 0.3 |
| Instruction Building | 7,000 | 0.2 |
| Student Resident Dormitory Buildings (6) | 42,000 | 1.0 |
| Athletic/Training Complex | | |
| Athletic Courts | 33,000 | 0.8 |
| Athletic Building and Locker Rooms | 4,675 | 0.1 |
| Aquatic Center: Warm-up Pool | 4,200 | 0.1 |
| Discover Center | | |
| Entry Exhibit Building | 6,360 | 0.1 |
| Lower School | | |
| Instruction Buildings | 4,300 | 0.1 |
| Middle School | | |
| Instruction Buildings | 5,400 | 0.1 |
| Athletic Courts | 19,175 | 0.4 |
| High School | | |
| Instruction Buildings & Gymnasium/Cafetorium | 24,125 | 0.6 |
| Athletic Courts | 14,120 | 0.3 |
| Youth Camp | | |
| Cabins | 8,000 | 0.2 |
| Maintenance/Storage Facilities | | |
| Maintenance Shop/Storage Warehouses | 4,650 | 0.1 |
| Garage/Storage Warehouse | 5,500 | 0.1 |
| Food & Supply Storage Warehouse | 20,400 | 0.5 |
| SUBTOTAL BUILDING FOOTPRINT AREA | 215,230 | 5 |
| Roadways and Pathways | 144,240 | 3.3 |
| SUBTOTAL ROADWAY & PATHWAY AREA | 144,240 | 3.3 |
| Parking Area for Instruction and Dormitory Buildings | 29,900 | 0.7 |
| Parking Area for Discovery Center | 77,510 | 1.8 |
| Parking/Drop-off Area for Middle School | 30,065 | 0.7 |
| Parking/Drop-off Area for High School | 30,070 | 0.7 |
| Parking & Delivery/Loading Area for Storage Facilities | 35,340 | 0.8 |
| SUBTOTAL PARKING AREA | 202,885 | 4.7 |
| Athletic/Soccer Field | 111,720 | 2.6 |
| Fields/Playground for Lower, Middle & High School | 103,400 | 2.4 |
| Lawn Areas and Landscaping | 466,750 | 10.7 |
| SUBTOTAL OPEN SPACE/PERVIOUS AREA | 681,870 | 15.7 |
| TOTAL PHASE 2 AREA | 1,244,225 | 29 |

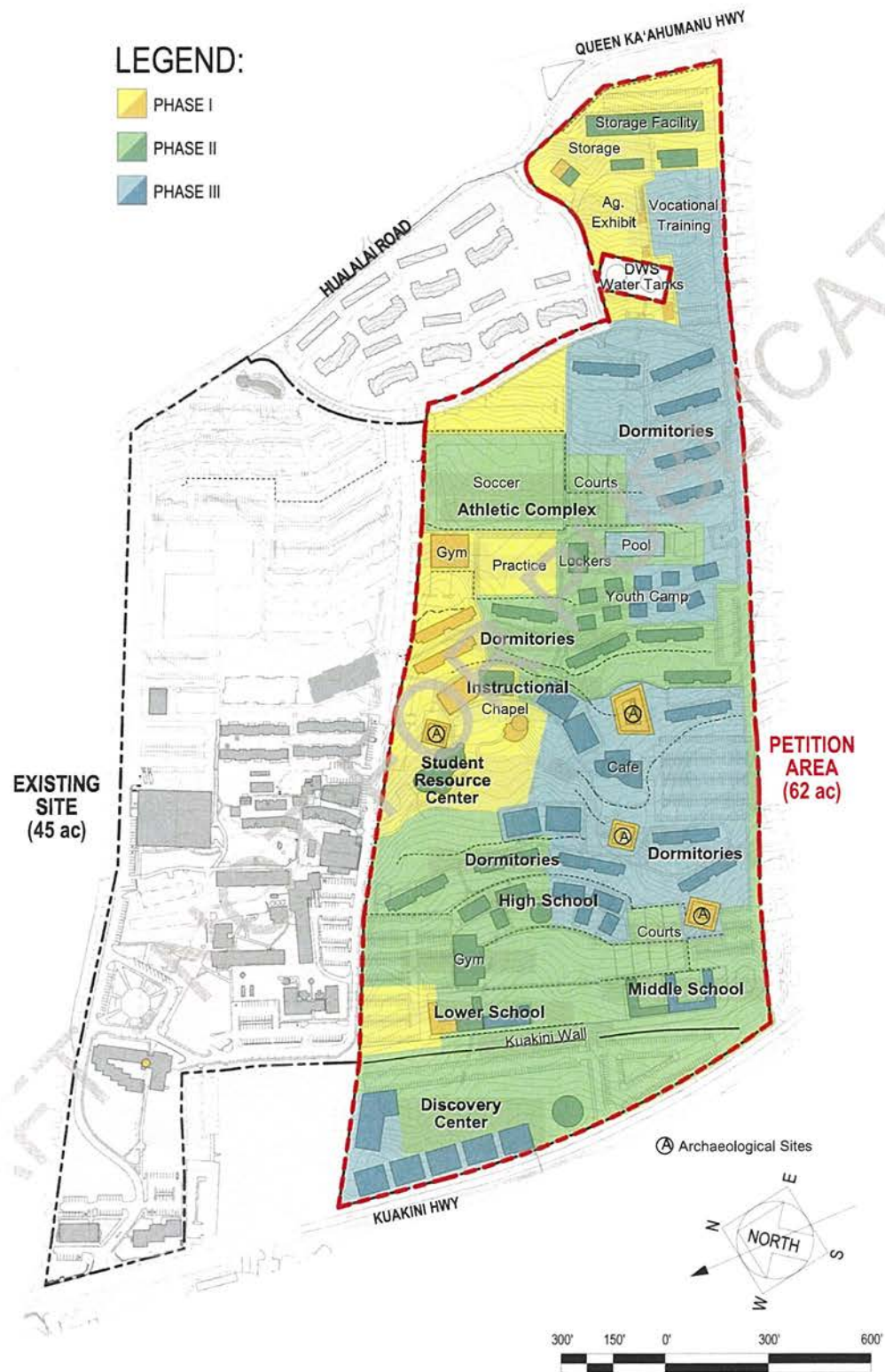


Figure 2-2c: Phase 3 - Proposed Projects for Petition Area

| Table 2-2c: Phase 3 - Proposed Projects for Petition Area | | |
|--|--------------------------|----------------|
| Petition Area Proposed Projects Phase 3 – Beyond 20 Years | Foot Print (SqFt) | Acreage |
| Discipleship Learning Center | | |
| Instruction Buildings | 28,000 | 0.6 |
| Café/Outdoor Dining Space | 9,900 | 0.2 |
| Student Resident Dormitory Buildings (9) | 63,000 | 1.4 |
| Athletic/Training Complex | | |
| Aquatic Center Pool Complex | 11,900 | 0.3 |
| Discovery Center | | |
| Exhibit Buildings | 46,540 | 1.1 |
| Lower School | | |
| Instruction Buildings | 5,440 | 0.1 |
| Middle School | | |
| Instruction Buildings | 7,975 | 0.2 |
| High School | | |
| Instruction Buildings | 11,610 | 0.3 |
| Youth Camp | | |
| Cabins | 12,000 | 0.3 |
| SUBTOTAL BUILDING FOOTPRINT AREA | 196,365 | 4.5 |
| Roadways and Pathways | 126,560 | 2.9 |
| SUBTOTAL ROADWAY & PATHWAY AREA | 126,560 | 2.9 |
| Parking Area for Instruction and Dormitory Buildings | 68,370 | 1.6 |
| Parking Area for Aquatic Center | 3,700 | 0.1 |
| SUBTOTAL PARKING AREA | 72,070 | 1.7 |
| Gathering Space Lawn Area | 32,730 | 0.8 |
| Training and Future Expansion Area | 61,500 | 1.4 |
| Open Space and Landscaping | 444,020 | 10.2 |
| SUBTOTAL OPEN SPACE/PERVIOUS AREA | 538,250 | 12.4 |
| TOTAL PHASE 3 AREA | 933,245 | 21 |

2.4 Description of the Proposed Improvements

Proposed buildings and projects are as follows:

Discipleship Learning Center:

The expansion of the Discipleship Learning Center is proposed to include additional instruction and classroom space. The intent for the proposed expansion is to build six new instruction buildings, generally not to exceed three-stories in height, organized around quadrangles and courts. The new instruction buildings are an opportunity to upgrade and provide modern learning spaces that accommodate new interactive forms of teaching and learning for both students and faculty.

Chapel:

The Chapel proposed for the Petition Area will connect with and play a key role in the development of the center of the Discipleship Learning Center. Consisting of almost 4,000 square feet, the proposed Chapel is envisioned to be an iconic, round structure. The architectural character of the building will create a centralized gathering space fitting with its surroundings. The proposed structure may also include a stepped-level entry with an outside seating area and a courtyard to create a welcoming and pleasant outdoor meeting and gathering space, which is envisioned to be available for weddings and other gatherings.

Student Dormitory Buildings:

Student dormitory housing will be provided throughout the campus. Existing dormitories are over 30 years old and are badly in need of refurbishing to meet current student needs and building codes. The seventeen (17) new student dormitory buildings proposed would provide modern medium-density student housing facilities and accommodate approximately 80-100 beds on average for each dormitory building. The new student housing will be contained in two- to three- story wings connected by a two-story building containing common facilities. Parking areas are planned to accommodate the proposed student dormitory buildings.

Student Resource Center:

The Student Resource Center proposed for the Petition Area is an opportunity to provide an upgraded facility and a modern library space that accommodates new interactive forms of teaching and learning for both students and faculty. Consisting of a footprint of approximately 12,300 square feet, the proposed Student Resource Center will be a two to three-story structure, rounded-shaped modern building with an architectural character reflective of the distinct sense of place of the Kona Region. The proposed structure will create a new gateway to the Petition Area fitting with its surroundings. The Student Resource Center may also include an entry courtyard with landscaped pavers and a variety of new plantings to create a welcoming and pleasant outdoor meeting, study, and informal gathering space for students, faculty and visitors.

Café/Outdoor Dining Area:

The Café/Outdoor Dining Area proposed is expected to provide food service and an outdoor dining space in a courtyard setting, envisioned as an excellent space for casual dining in a café like setting for students, faculty and visitors.

Athletic Complex:

The proposed Athletic Complex is envisioned to include a multi-phased development of a new gymnasium and athletic facilities. The design of the gymnasium would be able to accommodate the evolving curriculum of physical education and function as a space for competitive sport activities. The proposed multi-story design of the gymnasium would accommodate a basketball court and a regulation volleyball court, spectator seating, locker rooms, public facilities, offices, training facilities, lighting, and storage amenities. In addition, the Athletic Complex is envisioned to have an outside practice field and a full-sized athletic soccer field directly adjacent to the gymnasium. The full-sized soccer field would be developed to accommodate competitive sport activities and the practice field would accommodate additional physical education and outdoor competitive sport activities. Athletic courts are also envisioned to be located adjacent to the athletic field. Another athletic building is included and would provide an additional locker room for visiting teams with athletic team meeting rooms and offices. In addition, as a part of the Athletic Complex an aquatic center is envisioned to include an Olympic-sized swimming pool and warm-up pool with spectator seating and facilities. Parking areas would be provided adjacent to the proposed gymnasium, athletic fields and aquatic center for the Athletic Complex.

K-12 School:

The K-12 School proposed for the Petition Area is envisioned to include a multi-phased development of a Lower, Middle and High School to accommodate students ranging from Kindergarten to Grade 12. The expansion of the school will help to address the demand for educational facilities for family residents enrolled at U of N Kona.

The Lower School proposed for the Petition Area is envisioned to accommodate students ranging from Kindergarten to Grade 5. The Lower School is envisioned to be situated along the Spine Road and the entry to the Lower School from the Spine Road is envisioned to have a circular pick-up/drop-off area for the parents and children. The intent for the proposed expansion is to build four new instruction buildings, which will be single-story and organized around quadrangles and courts. Adjacent to the instruction buildings, a new playground field is proposed for recess and outdoor educational activities.

The Middle School proposed for the Petition Area is envisioned to include a multi-phased development of a new intermediate school to accommodate students ranging from Grade 6 to 8. The Middle School will be situated along the southern road proposed to for the Petition Area and the entry is envisioned to have a circular pick-up/drop-off area for the parents and students. The plan for the Middle School envisions five new instruction buildings, two-story and organized around quadrangles and courts. Adjacent to the instruction buildings, a field and athletic courts are proposed for recess and outdoor educational activities.

The High School proposed for the Petition Area is envisioned to include a multi-phased development of a new high school to accommodate students ranging from Grade 9 to 12. The High School will be situated above the Lower and Middle School. The plan for the High School envisions eight new instruction buildings, two-story and organized around quadrangles and courts. Located below the instruction buildings, a large field and athletic courts are proposed for recess and outdoor educational activities. In addition, a gymnasium/cafetorium would support additional instruction and training activity space, and to accommodate cafeteria dining space and student gatherings. Parking areas are also planned to accommodate the Lower, Middle and High School.

Discovery Center:

The Discovery Center is proposed to be located along the makai border of the Petition Area. The Discovery Center is planned to include six multi-story buildings, generally not to exceed three-stories in height. The proposed buildings are intended to house the Discipleship Learning Center's expansive language library, informational resources, and function as an instructional and research facility with administrative and staff office spaces. The design of the Discovery Center includes a main entry building, circular in shape, located along the entrance to the Petition Area from Kuakini Highway. The main circular building at the entrance will guide pedestrian entry to the Discovery Center complex. The design of the Discovery Center also incorporates a large courtyard space with pathways, landscaping and parking areas to accommodate visitors, students, faculty and staff.

Youth Camp:

The Youth Camp proposed for the Petition Area is intended to provide a camping ministry for families and youth of all ages with a place of physical and spiritual refreshment. The design of the cabins is envisioned to include facilities and amenities to support camping activities for students, families, counselors and staff.

Agricultural Exhibit:

An Agricultural Exhibit is proposed to be located in the mauka portion of the Petition Area. The proposed Agricultural Exhibit would include a garden and food forest to support educational activities related to permaculture gardening, food sustainability and sustainable agriculture. In addition, the proposed Agricultural Exhibit would include a designated pen area for the safe keeping of animals and possibly an aquaponics exhibit. In addition, a small instruction building is planned to support the educational and vocational training activities, as well as small storage/tool sheds, a plant nursery, and amenities.

Maintenance and Storage Facilities:

New maintenance and storage facilities are proposed to be located along the mauka border of the Petition Area. The proposed maintenance and storage facilities are planned to include four new warehouse buildings, generally not to exceed three-stories in height. The planned warehouse buildings would include maintenance shops and facilities, storage for food and supplies, garage space, and a parking area with a delivery and loading area for large containers and delivery trucks.

Archaeological Preservation Sites:

For the Phase 1 Planning Program, restoration of archaeological sites located within the Petition Area is planned through the implementation of an approved SHPD preservation plan. The preservation plan includes implementation of permanent rock wall buffers around each of the four identified burial sites on the Petition Area. The installation of the rock walls will create a permanent preservation buffer for the identified burial sites and meet requirements identified by the preservation plan. In addition, a dismantling and restoration plan for Kuakini Wall, located along the makai portion of the Petition Area, would be implemented, in coordination with SHPD.

VOC Training and Future Expansion Area:

The vocational training and future expansion area proposed for the Petition Area is intended to provide an expanded training area necessary to the U of N Kona program. Vocational education provides training necessary to become qualified professionals in a variety of trades and would blend training and technical instruction to prepare students for direct entry into trades and mission activities.

Roadways and Parking:

The overall design concept of the roadways and parking for the Petition Area is to give priority to pedestrian circulation. Vehicular arrival points such as parking lots and driveways are located on the periphery of the Petition Area. The peripheral design of the roadways and parking areas provides significant areas for pedestrian use and open space in the interior of the Petition Area. The locations of the additional parking areas easily provide connections and access to the proposed roadways bordering the Petition Area.

Landscape, Open Space and Pathways:

The vision of the landscape plan for the Petition Area, as derived during the development of the UNK Update, is that of a tropical, compatible landscape that supports a Hawaiian sense of place, including views and native plants, and makes a substantial contribution to environmental sustainability concerns, including drought-tolerant plants and storm water management. Overall, the landscape plan for the Petition Area will integrate Hawaiian culture through the use of native plants and landscaping elements that are representative of the natural and cultural landscape. Tree-covered terraces will provide shade and areas for reading, sitting, and eating. A system of pathways is planned to allow for safe day and night travel for pedestrians, including persons with disabilities. The pathways will begin at arrival and parking areas, lead to major walking pathways, and connect to active and functional gathering places, such as outdoor courtyards and sitting areas fronting buildings. Walking surfaces will be permeable whenever possible.

Infrastructure Improvements:

Infrastructure improvements include expansion of the existing on-site center Spine Road that bisects the Existing Campus and Petition Area, the addition of a secondary access point off of Kuakini Highway and necessary roadway improvements, and other upgrades to the existing utilities. Within the Petition Area, on-site infrastructure facilities to be expanded include circulation roadways, water transmission lines, wastewater collection lines, drainage systems, and electrical/communication systems. All infrastructure improvements will be designed and sized to accommodate the UNK Update. Construction will begin with development of infrastructure after applicable grading permits have been issued.

2.5 List of Required Permits and Reviews

Table 2-3 includes a list of the government approvals and permits anticipated to be required for implementation of the UNK Update, organized by state and county requirements. Compliance with established plans and policies of state and county agencies is discussed further in Section 6.0 of this EISPN, and will be further evaluated in the EIS.

| Table 2-3: List of Permits and Reviews | |
|---|---|
| Agency | Permits and Reviews |
| State of Hawai'i | |
| Land Use Commission (Accepting Authority) | HRS, Chapter 343 Environmental Impact Statement, Acceptability Determination; Amendment of Decision & Order in Docket No. A02-737 |
| Department of Land and Natural Resources, State Historic Preservation Division (SHPD) | Historic Preservation Review, Chapter 6E |
| Department of Health, Clean Water Branch | National Pollution Discharge Elimination System (NPDES) Permit |
| Department of Health, Environmental Management Division | Construction Noise Permit, Fugitive Dust, Wastewater System, Safe Drinking Water Permit |
| Department of Transportation, Highways Division | Highways Review, Turning Lane, Driveways and Private Storm Drain Connection |
| County of Hawai'i | |
| Department of Planning, Planning Division | Zone Change, County Council Approval; Plan Approval, Kailua Village Design Commission |
| Department of Public Works, Engineering Division | Grading, Grubbing, Stockpiling Permits County Right-of-Way Permit, Sewer Connection |
| Department of Public Works, Building Division | Building Permits |

3.0 Alternatives Considered

Alternatives to the UNK Update will be evaluated in the Draft EIS. The following are brief summaries of these alternatives.

3.1 No Action Alternative

Under the No Action Alternative, the Petition Area would remain in its current vacant state and no new facilities would be built.

3.2 Alternative Development Density

Lower Density Development Alternative

This alternative involves a lesser development than the UNK Update. For example, this alternative could propose developing Planning Program Phases 1 and 2, but not Phase 3.

Higher Density Development Alternative

Under this alternative, the Petition Area would be developed with greater density than the UNK Update. For example, this alternative could propose a larger building footprint to include additional instructional buildings and more student dormitories.

3.3 Alternative Land Uses

The Petition Area could be developed to encompass a range of viable urban land uses, such as primarily residential or commercial, which would present environmental impacts different from the UNK Update. Another potential alternative land use for the Petition Area is agricultural, which would also present environmental impacts different from the UNK Update. The Draft EIS will evaluate the impacts of both urban and agricultural alternative land uses.

3.4 Alternative of Deferral of the Proposed Action

Another alternative to implementing the UNK Update would be to defer the UNK Update.

The Draft EIS may evaluate and include discussion of other prudent and feasible alternatives which meet the U of N Kona's objectives that may be identified as part of the consultation process associated with publication of this EISPN.