



LAND USE COMMISSION

Komikina Ho'ohana 'Āina

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

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February 26, 2024

Jeff Overton, AICP, LEED AP
G70
111 S. King Street, Suite 170
Honolulu, HI 96813

SUBJECT: A02-737 Bencorp Draft Environmental Impact Statement Comments

Dear Mr.Overton:

Thank you for providing the Land Use Commission (“LUC” or Commission”) with the Draft Environmental Impact Statement (“DEIS”) for the University of the Nations, Kona Inc. 2020 Master Plan Update.

LUC staff has internally reviewed the document twice, prior to the publication of the DEIS in the February 8, 2024, issue of the Environmental Notice. LUC staff provides the following comment(s):

Section 4.5 Groundwater Resources/ Hydrology

In the previous comment letter, LUC staff identified concerns with the unsecured water resource, the location and size of water lines proposed for the Petition Area has not been confirmed, nor has a Water Development Agreement been negotiated between the developer and proposed land/ well developers.

During the internal meeting between petitioner and staff on September 19, 2023, it was argued that the petitioner did not have to provide specific information on water sources in the EIS phase, but LUC Staff believe providing information on how petitioner plans to obtain water will provide a cohesive application.

Section 6.2.2 State Land Use Commission

In section 6.2.2's discussion section there is mention of the 2003 district boundary amendment granting the urbanization of the project area, it states that:

The Master Plan Update for the Petition Area is consistent with Urban land usages as described in HRS Chapter 205 and will complement the surrounding urban area. U of N Kona acknowledges the Urban District designation of the Petition Area, and the Master Plan Update contemplates relocating the existing small farm and research center to the Existing Campus.

This section should include a statement that U of N Kona has the active 2020 motion to amend, to amend the current conditions and update the project description to reflect the Master Plan Update. Similarly, there should be mention of the motion to amend in the executive summary portion, as well as 3.3 Alternative Land Uses in the consistency paragraph.

The LUC Staff believe the other comments and suggestions that were listed in previous letters dated August 2, 2023, and January 24, 2024, have been adequately addressed at this time, but are subject to further comment and questioning by the Commission during the accepting authority proceedings.

Should you have any questions, please contact my office, at (808) 587-3823 or via email at dbedt.luc.web@hawaii.gov.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Daniel Orodener
Executive Officer
Land Use Commission
State of Hawai'i