

Vegetation Resources

It is customary to include the scientific name for a species in addition to the common name in order to reduce confusion stemming from a species holding multiple common/regional names. We would find it helpful if the authors would reproduce the table of listed plant species Table 1 in appendix report D) here in this part of the DEIS and the table of avian species on pages 4-17 (Table 2 in appendix report D).

Response: Tables 1 (plant species list) and 2 (avian species list) from the biological surveys (Appendix D) have been incorporated into the EIS report.

It is not clear from the text of the DEIS in the second to the last paragraph in this section what Unit 15 is. What endangered species habitat does Unit 15 refer to?

Response: Unit 15 refers to the U.S. Fish and Wildlife Service's designation of critical habitat for endangered and threatened plant species, as reported in the *Federal Register*, Vol. 68, No. 116, June 17, 2003.

The word "site" in the second paragraph in this section should either be "survey" or "transect."

Response: The word "site" has been replaced with "survey."

Potential Impacts and Mitigation Measures

In this section the DEIS discusses agricultural lands and the availability of "more affordable options with better access to irrigation water resources than are present on the Waianae Coast." What is the extent of available agricultural land on the Waianae Coast?

Response: Statistical data on available agricultural land at the sub-county level are not readily available. However, a new map has been added to the FEIS showing the amount and distribution of lands in the State Agricultural District.

Demographics

In this section the DEIS states "The proposed development is not expected to affect the number of residents or the demographic characteristics of people who live in the area." While the possible demographic change may not be significant, there is the possibility that companies may relocate from other parts of the island to the Nanakuli facility bringing with them workers already employed who could move to the Waianae coast.

Response: When companies move into the new industrial park, there is a possibility that workers who do not currently live in the region will relocate to live closer to their

workplace. However, the influx of new residents is not expected to be significant or cause adverse impacts on the local housing market.

Long-term Employment

What types of companies are likely to locate at the industrial park? Will they be new companies or existing companies relocating from other parts of the island to Nanakuli for some competitive or fiscal reason? What are the different impacts on long-term employment and demographics if the tenants are mostly transplanted companies from other parts of Oahu as opposed to new companies starting in the proposed baseyard?

Response: Among the 21 businesses that have expressed interest in the proposed industrial park are companies involved in trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). All businesses within the industrial park would need to conform to land use restrictions imposed by the proposed I-1, Limited Industrial District zoning classification.

Tropic Land expects that a mix of relocated and new businesses will locate in the light industrial park. Fifteen of the 21 businesses reported current addresses in Waianae. Six businesses are currently located in Honolulu, Aiea, Pearl City, Ewa Beach, and Kapolei. In addition to these businesses, the Waianae Coast Coalition, a non-profit organization, is supporting the business incubator component of the project for the purpose of encouraging start-up enterprises.

Surrounding Land Uses

This section should mention the number and placement of residential dwellings in the immediate vicinity of the project area. While there may not be many residential structures nearby, it would help in evaluating such things as noise and visual impacts.

Response: A new map has been added to the FEIS (Table 20) which shows land uses within 300 feet of the project area boundary. One private residence and several military structures are located within the 300-foot area.

Community Values

In several sections of the DEIS, most notably here [p. 5-19] and on page 4-42, the document states that the project will be an employment center offering well paid jobs. What types of jobs do the project's proposers foresee being created by the proposed project?

Response: The types of jobs foreseen are related to the types of businesses that have already expressed interest in locating at the proposed industrial park. The following table lists representative occupational titles with corresponding median hourly wages, based on statistics for the Honolulu Metropolitan Statistical Area (MSA) compiled by the State of

Hawaii, Department of Labor and Industrial Relations (*Occupational Employment and Wages in Hawaii, 2008*).

Occupational Title	Hourly Median (\$)
Stonemasons	27.19
Cement masons and concrete finishers	27.75
Construction laborers	23.38
Paving, surfacing, tamping equipment operators	34.78
Electricians	28.79
Painters, construction and maintenance	24.40
Landscaping, grounds maintenance workers	13.05
Truck drivers, heavy and tractor-trailer	18.38
Industrial truck and tractor operators	16.32
Material moving workers, all others	22.04
Total, all occupations	16.38

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

West County
Oahu Farm Bureau

87-1550 Kanahole Road Waianae, Hawaii 96792

RECEIVED JAN 08 2010

January 7, 2010

Mr. Dan Davidson, Executive Officer
Land Use Commission
235 . Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Davidson:

Re: Nanakuli Community Baseyard; Docket No. A09-782; TMK: (1)8-7-09:02 (por.)

West County of Oahu Farm Bureau has reviewed the Draft EIS and submits the following comments:

LAND USE POILICIES AND CONTROLS

We oppose Tropic Land LLC (applicant)'s request to seek an I-1 land use district amendment. We believe that the location and proximity of the project contributes to urbanization and undesirable encroachment pressures on important agricultural production of fresh leafy vegetables, herbs, pork and eggs in our valley. We believe this is a typical case of "spot zoning" where an interested party purchases vacant agricultural land solely for the purpose of development and not for farming. This request will definitely endanger the farming character of our community by further intrusion of industrial activity in addition to the conditional land uses of Pacific Aggregate and the PVT Landfill. Our farms will be surrounded from the Northeast, South and West.

The applicant has emphasized the soil quality of the property as a reason for the land to be undesirable for farming. We believe their intent to develop and not farm demonstrates their lack of interest to invest in irrigation and soil remediation. Many of our members own land with similar soil characteristics, yet our members have farmed this land since the 1940s and converted this community into a productive agricultural area.

One of the main threats to the viability of diversified agriculture is urban encroachment by incompatible land uses. We believe this application is contrary to the State Constitution to conserve and protect agricultural land. We believe that two values of the Waianae Sustainable Communities Plan: rural character and small town values are higher priorities than the applicant's emphasis on economic choices. Page 103 of the DEIS states the project has sufficient reserve areas for foreseeable urban growth and proposes "city like" concentration of people, structure, and services.

TRAFFIC

The Waianae Community has suffered transportation bottlenecks due to the "one way in, one way out" access of Farrington Highway. During natural disasters such as hurricanes and wind storms that close our highway from down electrical poles; traffic fatalities; or road construction, commuting is chaotic. Transporting our perishable products and livestock takes 30-45 minute more during these commuting catastrophies. Until Waianae receives a second highway, increasing traffic especially at the intersection of Lualualei Naval Road and Farrington Highway should be avoided. The DEIS states that traffic will increase at that intersection and the baseyard will accommodate heavy trucks and trailers.

We strongly oppose this request because this is no definite agreement with the Navy and the applicant to access Lualualei Naval Road. Hakimo Road is the primary access for the project and we strongly oppose any increase in industrial heavy trucks and trailers on Hakimo and Paakea Roads. Hakimo Road is a paved country road that is narrow with many bends and poor drainage. Many farmers use

January 7, 2010

these roads for transporting tractors and farm equipment between various farm lots. There are no sidewalks for children to wait for the school buses. Introducing industrial traffic levels will endanger children and farming residents.

FOOD SAFETY AND QUALITY

Our federal government and Hawaii Farm Bureau Federation have made food safety a priority. Our farmers are subject to food safety audits and inspections to do business with major wholesalers and retailers. The presence of this industrial park will impact the quality of the fresh produce we grown and the farmer's risk assessment for food safety audits.

Air Quality. The applicant's DEIS states: on page 75, its construction will emit fugitive dust and exhaust to adjacent areas. These pollutants can cause yellowing of vegetable and result in lower production and rejection of produce.

Solid Waste. The applicant's DEIS states certain industrial uses may have potential to generate hazardous or regulated waste. The quantities are not estimated because the precise nature of future occupants is unknown. The uncertainty of the solid waste from the baseyard is a serious concern to food safety.

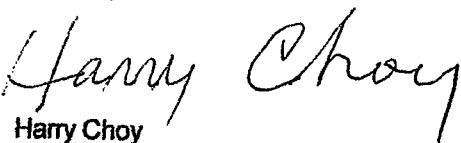
Waste Water Effluent. The applicant proposes to use the effluent from its waste water system for irrigation. We are concern of the contamination of vegetable fields during the rainy season from effluent runoff. Who will be guarantee that requirements to use waste water effluent for irrigation are fulfilled and the practice safe?

PURPOSE AND NEED FOR THE PROPOSED ACTION

The applicant raises the need to create employment in the Waianae Coast. Previous zone change applications have also stress the fulfillment of job creation by taking agricultural land for urban and industrial use. The emotion of job creation is high for the Waianae Community. Will this project attain that purpose without creating harm to agriculture, transportation and safety? The DEIS states the Waianae community is less likely to hold jobs in management position. Will the baseyard project attract the new entrepreneurs and others to create jobs, relocate to Waianae despite the traffic problems?

We respectfully ask the constitutional protection of agricultural land be applied to our community. Many of us were evicted from leased land by Estate land owners and relocated to Waianae 60 years ago. The suggestion that going back to lease agricultural land in the Ewa plains is naive. Former plantation lands have superior soil quality but lack the infrastructure of roads, water and electricity. Many leases are month to month or one year and restrict the farmer's ability for financing. The availability of ditch water is a serious issue. Waianae's farm lots have better infrastructure and desirable lot size for new immigrant farmers. Please oppose the land use district boundary amendment for Nanakuli Community Baseyard.

Sincerely,



Harry Choy
Director

Cc: Mr. Abbey Seth Mayer
Cc: Mr. Glenn Kimura



KIMURA INTERNATIONAL INC.

April 16, 2010

Mr. Harry Choy, Director
West County Oahu Farm Bureau
87-1550 Kanaha Road
Waianae, HI 96792

Dear Mr. Choy:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 7, 2010.

We note your concerns related to land use policies, traffic, food safety and quality, and the purpose of and need for the project. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to your questions

Who will guarantee that requirements to use waste water effluent for irrigation are fulfilled and the practice safe?

Response: New on-site wastewater system plans must be approved by the State of Hawaii, Department of Health (DOH), Wastewater Branch. Permits are tied to the City and County's building permit process. Permits for new construction require the DOH to review and sign permit applications.

The DOH also regulates the use of recycled water (*Guidelines for the Treatment and Use of Recycled Water*, Hawaii State Department of Health, Wastewater Branch, May 15, 2002). Requirements include DOH approval of an irrigation plan, engineering design report for the water reuse project, construction plans for the water reuse project, and employee training plan.

The emotion of job creation is high for the Waianae Community. Will this project attain that purpose without creating harm to agriculture, transportation and safety? The DEIS states the Waianae community is less likely to hold jobs in management position. Will the baseyard project attract the new entrepreneurs and others to create jobs, relocate to Waianae despite the traffic problems?

1600 Kapiolani Blvd., Suite 1610
Honolulu, HI 96814
Tel: 808 944-8848 • Fax: 808 941-8999

Response: Twenty-one businesses have expressed interest in acquiring one or more units in the proposed light industrial park. Because Tropic Land intends to offer units in the industrial park for sale on a condominium basis, Tropic Land cannot offer units for sale until the Real Estate commission has issued a Condominium Public Report for the project. Nevertheless, these businesses have expressed serious interest in the project and provided contact information to receive a public report. Fifteen of the 21 businesses reported current addresses in Waianae. Six businesses are currently located in other regions, such as Honolulu, Aiea, Pearl City, Ewa Beach, and Kapolei.

In addition to these businesses, the Waianae Coast Coalition, a non-profit organization, is supporting business incubator component of the project that would encourage start-up companies.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



December 14, 2009

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WILLIAM K. MAHOE

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WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager and Chief Engineer

RECEIVED DEC 18 2009

Mr. Dan Davidson, Executive Officer
Department of Business Economic Development & Tourism
State of Hawaii
Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Davidson:

Subject: Letter Dated November 20, 2009 on the Draft Environmental Impact
Statement (DEIS) for the Nanakuli Community Baseyard, Lualualei,
Waianae, TMK 8-7-009:002

Thank you for the opportunity to comment on the proposed project.

The existing water system cannot provide adequate fire protection to the proposed industrial development. Our Water System Standards require an offsite fire hydrant to be located within 125 linear feet of industrial developments and provide a flow of 4,000 gallons per minute (gpm). The existing water system can only provide a flow of approximately 2,200 gpm to fire hydrant L-945 at the intersection of Paakea Road and Hakimo Road. Therefore, the developer will be required to install approximately 7,000 linear feet of 16-inch water main from the 20-inch main at the intersection of Paakea and Hakimo Road to the site to upgrade the fire protection in accordance with our water system standards. The construction drawings should be submitted for our review and approval.

Please be advised that this information is based upon current data and, therefore, the Board of Water Supply reserves its right to change any position or information stated herein up until the availability of water will be confirmed when the building permit application is submitted for approval.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

Mr. Dan Davidson
December 14, 2009
Page 2

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions please contact Robert Chun at 527-6123.

Very truly yours,



KEITH S. SHIDA
Program Administrator
Customer Care Division

cc: Mr. Glen Kimura, Kimura International, Incorporated
Mr. Abbey Seth Mayer, DBEDT-Office of Planning



KIMURA INTERNATIONAL INC.

April 16, 2010

Mr. Keith S. Shida, Program Administrator
Customer Care Division
Board of Water Supply
630 South Beretania Street
Honolulu, HI 96843

Dear Mr. Shida:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated December 14, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. The existing water system cannot provide adequate fire protection to the proposed industrial development. Our Water System Standards require an offsite fire hydrant to be located within 125 linear feet of industrial developments and provide a flow of 4,000 gallons per minute (gpm). The existing water system can only provide a flow of approximately 2,200 gpm to fire hydrant L-945 at the intersection of Paakea Road and Hakimo Road. Therefore, the developer will be required to install approximately 7,000 linear feet of 16-inch water main from the 20-inch main at the intersection of Paakea and Hakimo Road to the site to upgrade the fire protection in accordance with our water system standards. The construction drawings should be submitted for our review and approval.

Response: The project owner intends to construct a 16-inch water main that connects to the existing 20-inch main at the intersection of Paakea and Hakimo Roads. This facility will be designed and constructed to the Board of Water Supply's standards. Construction drawings, to be prepared during the project design phase, will be submitted for your review and approval.

The project owner is aware that availability of water is yet to be confirmed, and that confirmation will be made when the building permit application is submitted for approval. Furthermore, when water is made available, the project owner will be required to pay Water System Facility Charges for resource development, transmission, and daily storage.

On-site fire protection requirements will be coordinated with the Fire Prevention Bureau of the Fire Department.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

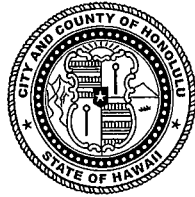
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Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR

DAVID K. TANOUE
DIRECTOR
ROBERT M. SUMITOMO
DEPUTY DIRECTOR

2009/ELOG-2772 (mw)

January 20, 2010

RECEIVED JAN 21 2010

Mr. Orlando Davidson, Executive Officer
Land Use Commission
State of Hawaii
P. O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Mr. Davidson:

Subject: Draft Environmental Impact Statement (EIS) for the Nanakuli Community
Base Yard, Lualualei, Waianae, Oahu, TMK 8-7-9: por. 2

We have the following comments on this Draft EIS for Tropic Land's proposed 96-acre industrial park next to the Lualualei Navy facility:

1. In Chapter 2, the project's market analysis needs to provide more information that there is indeed a potential demand for additional industrial land in the Waianae district. The EIS should discuss the development of the 15-acre industrial park at Village Pokai Bay in Waianae Town. Other useful information includes: (1) the growth history of other new leeward industrial parks (such as Mill Town Center in Waipahu), (2) statements by realtors that there have been inquiries about land for light industrial use in the leeward area's west end, and (3) actual relocations of industries in the direction of Waianae. In addition, Chapter 2 needs to defend two underlying assumptions behind the market analysis: (1) that the enormous proportional disparity of jobs between major employment centers and outlying bedroom communities can actually be solved by making more land available for business growth in purely residential areas, and (2) the conversion factor of "5,000 square feet of land area per employee/job", which the market analysis uses to calculate the future demand for industrial land in the Waianae district.
2. The EIS is erroneously characterizing the lands along Lualualei Naval Access Road as urban and industrial, when much of it is open space and rural. The EIS should discuss nearby land uses in terms of their location beyond the Waianae Sustainable Communities Plan's (SCP) Rural Community Boundary.
3. Chapter 4 needs to discuss all the potential impacts of the planned industrial uses themselves. Potential impacts from industrial operations include internal traffic circulation of large trucks, potential groundwater contamination, and potential noise and air quality impacts.

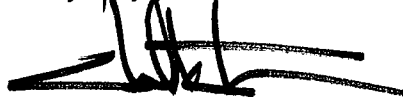
4. Consistency is needed with regard to existing wells and water use. Section 4.2 states that the existing wells will remain capped, whereas Section 3.1 states that the wastewater effluent may be diluted with non-potable water from these wells, and Section 4.15.2 states that potable water may be used for this purpose.
5. Section 4-9 needs to discuss the need for sidewalks, bike paths, and street light improvements, both along Lualualei Naval Access Road and within the project. These types of travel improvements are recommended by the Waianae SCP along major valley roads, and would be required within the project if subdivision of the land were being requested.
6. Section 4.15 needs to discuss the Underground Injection Control line as well as the No Pass Zone, and to map both.
7. In Section 5.6 on the General Plan, the Physical Development and Urban Design subsection should: (1) explain why a new employment center is appropriate to this location, and (2) remove Objective D, Policy 1, since it applies only to urban-fringe areas, and the General Plan considers the entire Waianae district to be a rural area.
8. A fuller discussion is also needed on the Waianae SCP's vision for the future of the region (Section 5.7). First, when discussing how the project relates to that vision, it is important to bring up the associated community value on the need for economic choices. Second, the discussion of the second vision element, Rural Values and Qualities, needs to: (1) explain how adding an industrial park in an outlying area fits in with this vision element, and (2) describe the project site as having easy access to the freeway, but not as being "close to the freeway". Third, all six vision elements need to be listed and briefly discussed, especially the limited availability of potable water in the Waianae district.
9. Section 5.8 misstates the project area's zoning and zoning history. First, Table 17 should indicate that an estimated 71 acres are zoned P-1 Restricted Preservation (the area within the State Conservation District). Second, the rezoning of the property for golf course use occurred in 1996, not in 1999, and changed only part of the parcel from the AG-1 and AG-2 agricultural districts to the P-2 General Preservation district.
10. A licensed geotechnical engineer needs to be retained to investigate the potential rockfall hazards and to recommend mitigation measures. Also, the developer is expected to construct all improvements recommended by the geotechnical engineer in order to ensure that the site is suitable for development.
11. On page 4-6, the City grading ordinance should be listed as Chapter 14 of the Revised Ordinances of Honolulu, not as Chapter 23.

Mr. Orlando Davidson, Executive Officer
Land Use Commission
January 20, 2010
Page 3

12. The preliminary engineering report prepared by Hida, Okamoto and Associates and included in the Final EIS must be stamped and signed by a licensed civil engineer, with the authentication statement placed below the engineer's stamp.
13. Why are soil loss calculations provided to reflect the long-term change in soil erosion potential? They may not be accurate, for two reasons: (1) the proposed and future LS values may not be the same, and (2) the existing and future C values should be based on the Universal Soil Loss Equation's Tables 20 and 22, respectively.
14. The discussion on flooding in Section 4.4 should be expanded to cover the need to set back buildings from Ulehawa Stream. It should mention that the site plan includes a landscaped setback encompassing Ulehawa Stream (see pages 3-2 and 3-4). It should also note that the drainage basin covers over 1,000 acres and that the Q100 is about 2,800 cfs.
15. With regard to the drainage catchment areas, Figure 12 (page 4-10) has two areas labeled "B-1", and the size of drainage catchment area A is correctly listed in Table 6 (page 4-8) as 1,084 acres, but incorrectly as 1.08 acres in Tables 3 and 4 of the Preliminary Engineering Report.
16. The entire report needs to be carefully proofread. Be especially careful on compass directions, figure numbers, etc. One particularly misleading statement on page 6-1 should be edited as follows: "Increased vehicular travel along Farrington Highway and Lualualei Naval Access Road will have an effect on traffic flow." Also, two paragraphs on page 4-19 on soil types and crop productivity ratings are especially hard to follow.

Should you have any questions, please contact Mike Watkins of our staff at 768-8044.

Very truly yours,



David K. Tanoue, Director
Department of Planning and Permitting

DKT:js

cc: OEQC
Kimura International, Inc.
Office of Planning

Tropic Land DEIS



KIMURA INTERNATIONAL INC.

April 16, 2010

Mr. David K. Tanoue, Director
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Dear Mr. Tanoue:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 20, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. In Chapter 2, the project's market analysis needs to provide more information that there is indeed a potential demand for additional industrial land in the Waianae district. The EIS should discuss the development of the 15-acre industrial park at Village Pokai Bay in Waianae Town... In addition, Chapter 2 needs to defend two underlying assumptions behind the market analysis: (1) that the enormous proportional disparity of jobs between major employment centers and outlying bedroom communities can actually be solved by making more land available for business growth in purely residential areas, and (2) the conversion factor of "5,000 square feet of land area per employee/job," which the market analysis uses to calculate the future demand for industrial land in the Waianae district.

Response: Twenty-one businesses have expressed interest in acquiring one or more units in the proposed light industrial park. Because Tropic Land intends to offer units in the industrial park for sale on a condominium basis, Tropic Land cannot offer units for sale until the Real Estate Commission has issued a Condominium Public Report for the project. Nevertheless, these businesses have expressed serious interest in the project and provided contact information to receive a Public Report. The 21 businesses engage in the following types of business activity: trucking and hauling, equipment handling, general

1600 Kapiolani Blvd., Suite 1610
Honolulu, HI 96814
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contracting, and trades (painting, welding, electrical, masonry, landscaping). Twelve of the 21 businesses are involved with trucking services, which is consistent with a “baseyard”-type development, offering industrial space for less intensive land uses.

All uses would conform to the proposed zoning classification of I-1, Limited Industrial District. Fifteen of the 21 businesses reported current addresses in Waianae. Six businesses are currently located in other regions, such as Honolulu, Aiea, Pearl City, Ewa Beach, and Kapolei.

In addition to these businesses, the Waianae Coast Coalition, a non-profit organization, is supporting the business incubator component of the project.

The Village Pokai Bay Industrial Park has not been developed. Although it was proposed a number of years ago, the site is little more than a vacant lot.

2. The EIS is erroneously characterizing the lands along Lualualei Naval Access Road as urban and industrial, when much of it is open space and rural. The EIS should discuss nearby land uses in terms of their location beyond the Waianae Sustainable Communities Plan’s (SCP) Rural Community Boundary.

Response: In the existing Waianae SCP, the Rural Community Boundary runs *mauka* along Lualualei Naval Access Road to the Paakea Road intersection, then along the length of Paakea Road through Ma’ili. The project site is located approximately 0.25 mile outside the Rural Community Boundary, from a point at the intersection of Lualualei Naval Access Road and Paakea Road. This intersection also marks the *mauka* extent of the State Urban District, with the PVT Landfill and Pineridge Farms (formerly a cement manufacturing plant and presently a recycling facility), located within lands classified as Urban.

3. Chapter 4 needs to discuss all the potential impacts of the planned industrial uses themselves. Potential impacts from industrial operations include internal traffic circulation of large trucks, potential groundwater contamination, and potential noise and air quality impacts.

Response: Potential short-term (construction phase) and long-term (operational phase) impacts are discussed in Chapter 3, which describes the project and Chapter 5, which describes potential impacts and mitigations for each resource area. Chapter 7 identifies unavoidable short- and long-term adverse impacts, as well as secondary and cumulative impacts. The summary sheet at the front of the document provides an overview.

4. Consistency is needed with regard to existing wells and water use. Section 4.2 states that the existing wells will remain capped, whereas Section 3.1 states that the wastewater effluent

may be diluted with non-potable water from these wells, and Section 4.15.2 states that potable water may be used for this purpose.

Response: Existing wells will remain capped. Relevant sections of the FEIS have been revised accordingly.

5. Section 4.9 needs to discuss the need for sidewalks, bike paths, and street light improvements, both along Lualualei Naval Access Road and within the project. These types of travel improvements are recommended by the Waianae SCP along major valley roads, and would be required within the project if subdivision of the land were being requested.

Response: Because Tropic Land intends to submit the project to a Condominium Property Regime, Tropic Land may not be required to obtain final subdivision approval for the project. If subdivision approval is not required, specific roadway improvements will be addressed during the design phase of the project and in consultation with the U.S. Navy and City agencies.

6. Section 4.15 needs to discuss both the Underground Injection Control line as well as the No Pass Zone, and to map both.

Response: The Underground Injection Control area is discussed in Section 5.2 of the FEIS and illustrated in Figure 12.

7. In Section 5.6 on the General Plan, the Physical Development and Urban Design subsection should (1) explain why a new employment center is appropriate to this location and (2) remove Objective D, Policy 1, since it applies only to urban-fringe areas, and the General Plan considers the entire Waianae district to be a rural area.

Response: The appropriateness of Lualualei Valley for a light industrial park is described on page 6-15. Reference to Objective D, Policy 1 has been deleted.

8. A fuller discussion is also needed on the Waianae SCP's vision for the future of the region (Section 5.7). First, when discussing how the project relates to that vision, it is important to bring up the associated community value on the need for economic choices. Second, the discussion of the second vision element, Rural Values and Qualities, needs to (1) explain how adding an industrial park in an outlying area fits in with this vision element, and (2) describe the project site as having easy access to the freeway, but not as being "close to the freeway." Third, all six vision elements need to be listed and briefly discussed, especially the limited availability of potable water in the Waianae district.

Response: The discussion of the relationship of the project to the Waianae SCP's vision and community values may be found on page 6-19.

9. Section 5.8 misstates the project area's zoning and zoning history. First, Table 17 should indicate that an estimated 71 acres are zoned P-1 Restricted Preservation (the area within the State Conservation District). Second, the rezoning of the property for the golf course occurred in 1996, not in 1999, and changed only part of the parcel from the AG-1 and AG-2 agricultural districts to the P-2 General Preservation district.

Response: Acreages in the table showing "Current and Proposed Zoning" (Table 20 in the FEIS) have been revised. The rezoning date for the golf course has been changed to 1996.

10. A licensed geotechnical engineer needs to be retained to investigate the potential rockfall hazards and to recommend mitigation measures. Also, the developer is expected to construct all improvements recommended by the geotechnical engineer in order to ensure that the site is suitable for development.

Response: A geotechnical study by a licensed engineer will be conducted during the design phase of the project. The project owner expects to implement the recommendations of the study.

11. On page 4-6, the City grading ordinance should be listed as Chapter 14 of the Revised Ordinances of Honolulu, not as Chapter 23.

Response: Correction made.

12. The preliminary engineering report prepared by Hida, Okamoto and Associates and included in the Final EIS must be stamped and signed by a licensed civil engineer, with the authentication statement placed below the engineer's stamp.

Response: The preliminary engineering report (Appendix A) has been stamped and signed by a licensed civil engineer.

13. Why are soil loss calculations provided to reflect the long-term change in soil erosion potential? They may not be accurate, for two reasons: (1) the proposed and future LS values may not be the same, and (2) the existing and future C values should be based on the Universal Soil Loss Equation's Tables 20 and 22, respectively.

Response: The soil loss calculations have been modified, as shown in Table 5.

14. The discussion on flooding in Section 4.4 should be expanded to cover the need to set back buildings from Ulehawa Stream. It should mention that the site plan includes a landscaped setback encompassing Ulehawa Stream (see pages 3-2 and 3-4). It should also note that the drainage basin covers over 1,000 acres and that the Q100 is about 2,800 cfs.

Response: The discussion on flooding (Section 5.4 in the FEIS) notes that the buffer area surrounding Ulehawa Stream serves as a building setback.

15. With regard to the drainage catchment areas, Figure 12 (page 4-10) has two areas labeled "B-1," and the size of drainage catchment area A is correctly listed in Table 6 (page 4-8) as 1,084 acres, but incorrectly as 1.08 acres in Tables 3 and 4 of the Preliminary Engineering Report.

Response: Corrections have been made to Figure 13 in the FEIS and the Preliminary Engineering Report tables.

16. The entire report needs to be carefully proofread. Be especially careful on compass directions, figure numbers, etc. One particularly misleading statement on page 6-1 should be edited as follows: "Increased vehicular travel along Farrington Highway and Lualualei Naval Access Road will have an effect on traffic flow." Also, two paragraphs on page 4-19 on soil types and crop productivity ratings are especially hard to follow.

Response: Typographical errors corrected.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

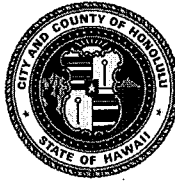
Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR



WAYNE YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

TP11/09-342653R

January 7, 2010

RECEIVED JAN 08 2010

Mr. Glenn Kimura
Kimura International Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96813

Dear Mr. Kimura:

Subject: Draft Environmental Impact Statement for Nanakuli
Community Baseyard Project, Nanakuli, Oahu

This responds to the Draft Environmental Impact Statement (DEIS) study for the subject project. We are offering the following comments:

- We believe that the project title should be renamed to reflect the project intent and purpose. The City commonly uses the title "baseyard" for its various facilities that provide maintenance, repair, and other related services for its vehicles. The project, as described in the "proposed action" is a condominium type "industrial park." Therefore, in order to prevent confusion on the proposed project, we strongly suggest that the project title be renamed as an "industrial park" and not a "baseyard;"
- The Traffic Impact Assessment Report should include an assessment of impacts on local roads;
- Lualualei Naval Access Road, as noted in the document, is currently controlled by the U.S. Navy. The final Environmental Impact Statement (FEIS) should include formal documentation (i.e. letter of agreement) of the agreement between the Navy and the property owner to utilize the Access Road to gain access to the property. We would be very concerned about potential traffic impacts if access to the property were to utilize Hakimo Road which currently does not meet City roadway standards;

Mr. Glenn Kimura
Page 2
January 7, 2010

- The document should clarify the term "fair share agreement." This term is mentioned in regards to an agreement between the State, City, and the property owner. As part of rezoning, it has been City policy to require developers to construct and/or implement any necessary transportation related mitigation measures that may be required of a project. The City, to date, has not entered into any verbal or formal agreement to participate in any "fair share agreement" for transportation related improvements in the area; and
- The DEIS should document any pre-consultation, correspondence or meetings the developer may have had with the State Department of Transportation (HDOT) since the proposed project impacts Farrington Highway. The results of any meetings or correspondence with HDOT and their concerns should have been included in Section 4.9. of the DEIS that discusses "Roadways and Traffic."

Should you have any questions, you may contact Mr. Brian Suzuki of my staff at 768-8349.

Very truly yours,



Wayne Y. Yoshioka
Director

cc: Mr. Dan Davidson
Land Use Commission

Ms. Abbey Seth Mayer
Office of Planning

Office of Environmental Quality Control



KIMURA INTERNATIONAL INC.

April 16, 2010

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 7, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. We believe that the project title should be renamed to reflect the project intent and purpose. The City commonly uses the title “baseyard” for its various facilities that provide maintenance, repair, and other related services for its vehicles. The project, as described in the “proposed action” is a condominium type “industrial park.” Therefore, in order to prevent confusion on the proposed project, we strongly suggest that the project title be renamed as an “industrial park” and not a baseyard.

Response: The term “baseyard” reflects early interest in the project from businesses that would use the location as a base of operations, including companies involved in trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). Nevertheless, Tropic Land is considering a name change in the future. Any change would be made with input from the local community.

2. The Transportation Impact Assessment Report should include an assessment of impacts on local roads.

Response: The TIAR focuses on impacts to Farrington Highway, the public roadway closest to the project site. Impacts to Lualualei Naval Access Road and appropriate mitigation measures will be determined in consultation with the Navy as part of the ongoing process of reaching a long-term easement agreement to use the road.

3. Lualualei Naval Access Road, as noted in the document, is currently controlled by the U.S. Navy. The final Environmental Impact Statement (FEIS) should include formal documentation (i.e., letter of agreement) of the agreement between the Navy and the property owner to utilize the Access Road to gain access to the property. We would be very concerned about potential traffic impacts if access to the property were to utilize Hakimo Road which currently does not meet City roadway standards.

Response: Correspondence related to Lualualei Naval Access Road between Tropic Land and the Navy is included in Appendix K of the FEIS. As noted in the correspondence the Navy had agreed to leasing a long term easement to use Lualualei Naval Access Road to the adjoining property owners who are presently the primary non-Navy users of the road. Tropic Land and the Navy are presently discussing the terms of the easement.

4. The document should clarify the term “fair share agreement.” This term is mentioned in regards to an agreement between the State, City, and the property owner. As part of rezoning, it has been City policy to require developers to construct and/or implement any necessary transportation related mitigation measures that may be required of a project. The City, to date, has not entered into any verbal or formal agreement to participate in any “fair share agreement” for transportation related improvements in the area.

Response: Detailed plans for roadway improvements and how they will be implemented will be determined in consultation with the Navy and other stakeholders. Tropic Land is committed to implementing mitigation measures that may be required of the project.

5. The DEIS should document any pre-consultation, correspondence or meetings the developer may have had with the State Department of Transportation (HDOT) since the proposed project impacts Farrington Highway. The results of any meetings or correspondence with HDOT and their concerns should have been included in Section 4.9 of the DEIS that discusses “Roadways and Traffic.”

Response: Letters from HDOT were received during the EISPN and DEIS comment periods. These letters are included in the respective sections of the FEIS.

Department of Transportation Services
April 16, 2010
Page 3

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd



MUFI HANNEMANN
MAYOR

KENNETH G. SILVA
FIRE CHIEF

ALVIN K. TOMITA
DEPUTY FIRE CHIEF

December 15, 2009

RECEIVED DEC 19 2009

Mr. Glenn Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96814

Dear Mr. Kimura:

Subject: Draft Environmental Impact Statement
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu
Tax Map Key: 8-7-009: 002 (Portion)

In response to your letter of November 20, 2009, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet (45 720 mm) from a fire apparatus access road as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)
2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of 150 feet (45 720 mm) from a water supply on a fire

Mr. Glenn Kimura
Page 2
December 15, 2009

apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2, as amended.)

3. Submit civil drawings to the HFD for review and approval.

Should you have any questions, please call Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth G. Silva".

KENNETH G. SILVA
Fire Chief

KGS/KN:bh



KIMURA INTERNATIONAL INC.

April 16, 2010

Mr. Kenneth G. Silva, Fire Chief
Honolulu Fire Department
636 South Street
Honolulu, HI 96813

Dear Chief Silva:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated December 15, 2009. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet from a fire apparatus access road as measured by an approved route around the exterior of the building or road.
2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

On-site fire hydrants and mains capable of supplying the require fire flow shall be provided when any portion of the facility or building is in excess of 150 feet from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building.

3. Submit civil drawings to the HFD for review and approval.

Response: The project's water system will be connected to the existing 20-inch Board of Water Supply water main at the intersection of Paakea Road and Hakimo Road. By letter dated July 2, 2009, the BWS has indicated that installation of a new 16-inch water main will provide adequate fire flow for the proposed industrial park. On-site fire hydrants and fire apparatus access routes will be provided as required by the 1997 Uniform Fire Code.

Detailed construction drawings will be prepared during the design phase of the project. Civil drawings will be submitted to the HFD for review and approval.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

Mr. Glenn Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, HI 96814

RECEIVED JAN 08 2010

Alice Greenwood
Concerned Elders of Waianae
87-576 Kula'aupuni Street C-101
Waianae, HI 96792

January 7, 2010

Dear Mr. Kimura,

The Concerned Elders of Waianae is very concerned about the proposal to establish an industrial park on agricultural land in Ulehawa in Nanakuli. We have reviewed the Draft Environmental Impact Statement dated November 2009 and have the following comments. Because many of the concerns we have already raised have not been addressed, we have reiterated those as well.

Concern for the Environment of Nanakuli

Industrial parks pose an unacceptably high risk to the health and well-being of neighboring communities.

Please explain how a golf course is like an industrial park? It is not obvious why the document compares the previous proposed land use with this future proposed land use, when the two uses are dissimilar.

Endangered Species

What is the state of the endangered Nehe? How much land does the Nehe need to recover and be removed from the endangered species list? What impact will construction of this industrial park have on the survival and recovery of this endangered plant species?

What impact will construction on this site have on the ecology downhill? Sacred designations for land usually have practical implications. This area was set aside as sacred, which may indicate that disturbing the soil here might have detrimental consequences on the land and ocean below it.

Air Pollution

We have concerns about the increase to annual average for particulate, sulfur dioxide and increased annual averages of daily maximum one-hour values recorded for ozone and carbon monoxide, especially because the air quality along Farrington Highway of Lualualei Naval Road is already highly impacted by heavy vehicle emission of diesel particulates.

If this project proceeds, then an air quality monitoring station must be established. Quarterly reports of air quality in the area must also be released to the public on a quarterly basis.

Please assess the exposure that residents, especially children and the elderly, will suffer from due to the environmental impact of truck emission and exhaust.

Waste Water

Increased lot coverage by large buildings and more extensive paving can increase the volume and rate of storm water discharge. Over the long-term, the cumulative impact of greater lot coverage threatens to erode the natural stream banks downstream, requiring the expensive and aesthetically and ecologically undesirable structural hardening of the drainage channel, or consequently resulting in the exceeding of the capacity of the drainage system resulting in flood conditions.

What is the general drainage pattern of the project site? Where is the nearest storm drain connection? What are your plans for the municipal storm drain facility?

Will the project be allowed to increase surface runoff onto adjoining properties or rights-of-way? When the project increases, the amount of paving the runoff concerns are real. Where will the surface waters be directed?

Currently the Lualualei Booster Station has a limited capacity of 25,000 GPD whereas the project water demand is estimated at a peak demand of 67,650 GPD. Is there a requirement for the Lualualei Booster Station to be upgraded to handle the additional demand?

Will the proposed wastewater system be sized for the peak-hour demand of 67,650 GPD? If not, how will anything greater than 22,250 GPD be handled?

The existing water system provides a 2200 GPM flow to a fire hydrant at Paakea Road and Hakimo Road. If the project requires 4000 GPM over a three-hour duration for fire, how can the proposed 16-inch line being proposed provide more water than what is available without impact to the Board of Water Supply? Who will pay for improvements to provide 4000 GPM at the point where the project will pick up the water line?

How did the developer determine the size of the waste treatment facility? Is it based on the anticipated square footage of the park? Is it based on flow? There is insufficient information about the design and what types of waste will be produced and flushed into the waste plant-- human and non-human. This document does not disclose sufficiently the environmental effects of the proposed waste plant in this early stage of the approval process.

What is the reduction to potable water need by using non-potable water from the treated wastewater effluent?

Has the State Department of Health approved CBT systems for other private developments? Can you give valid working examples?

Most sludge from the City and County managed wastewater treatment facilities are "dried" for a period of time prior to disposal. Will this facility do the same? If so, is there sufficient area allowed for this process?

Who will own and operate this facility?

Why is the wastewater treatment plant located directly across from properties used for farming?

Will there be secondary treatment of the effluent proposed by the proposed project?

Can the non-potable water be used for other purposes separate from irrigation? For example, should there be contingencies made so that it may be used for toilet purposes or other industrial water purposes, i.e. washing of vehicles?

How will the community be protected from hazardous material used at the proposed project site? Will the project owner and/or operator prevent businesses in this industrial park from generating hazardous waste, especially since the community may not know what hazardous waste is being generated unless they go through every business permit for all the businesses located at the baseyard?

Will the project owner and/or operator also prohibit medical wastes from being produced or stored on the proposed site? Other industrial park locations in Hawaii have had incidents of medical waste being stored improperly for prolonged periods of time.

There is no mention that any waste generated could be sent to PVT. What if there is C&D waste generated by a specific business, e.g. recycling construction materials? Will this be handled by individual businesses?

In section 4-15.5, please correct: It is not the Mikiloa Substation but should be Mikilua.

When will they have commitments from HECO, Hawaiian Telcom and Oceanic Time Warner to provide connections? They say it is anticipated that they will provide service.

There should be a requirement for green construction of facilities. If it is not required, it will not be done because it is not necessarily seen as cost effective in the short term.

What is being done to reduce the normal carbon footprint of a light industrial park?

Stormwater management: How will storm water management be managed for each lot and then subsequently for the entire property? Who will be responsible in the long term? Where will the storm water go?

There is discussion regarding a detention area of an approximately 100-foot wide strip of land mauka of the industrial lots to accommodate peak runoff from the hillside. While this may handle the amount of flow that will occur based on the undeveloped hillside and the developed lots, this should be a retention basin considering the pollutants that may (probably will) occur

based on the businesses that can be anticipated to be located within the baseyard. This becomes important, especially if it possible that hazardous waste may be generated on site (see section 4-15.4).

Will collection/separation systems be established to separate and collect contaminants from impermeable surfaces in the industrial park so that they do not go down the drain with the storm water runoff.

Ground & Soil

Does Tropic Land have plans to remove the soil?

For slab-on-grade construction, what plans do you have for altering the topography (excavating, filing, and grading)?

How many acres does Tropic Land plan for soil disturbance? If it's greater than one acre, Tropic Land will need NPDES permit.

Development on unstable soils could result in adverse hazardous conditions. Where locations have deposits of unstable soils, slow-moving landslides can cause property damage.

Please conduct a soil study. The soil on this lot is not adequate for safely constructing warehouses, as Tropic Land proposes to do.

Concern for the Quality of Life in Nanakuli

The proposed industrial park is out of sync with the rural, agricultural lifestyle of Lualualei Valley residents.

The few noxious commercial activities allowed on properties abutting Lualualei Naval Road have, over the short-term, compromised the quality of life for residents along Farrington Highway and on Hakimo Road. Despite this, many residents continue to perpetuate their farming traditions, growing food and raising animals on their agricultural plots. The addition of one more "urban-like" usage next to working agricultural farms and residential communities without addressing the reduction, elimination or prevention of serious public health issues is immoral.

Allowing this industrial park to be established in the middle of this longstanding rural residential and agricultural community will further compromise the public health for citizens in the Lualualei ahupuaa.

Noise

The project is not in a highly developed area. Existing ambient noise levels are relatively low. The noise sources will increase from traffic noise due to large volumes of traffic and heavy vehicles that will use Hakimo Road, the primary traffic access to the project.

What are your hours of operation?

Please estimate the number of trucks that will access the proposed project.

Water Supply

The project is not served by the existing water lines and water meters. How will buildings be served if there are no existing laterals for water lines?

Are the existing water lines for agricultural lots of sufficient size and adequate to serve the urban needs of the new buildings to be constructed and the changed uses of the new users who occupy them?

Tropic Land will use sub-standard quality water to irrigate the project which will require better management practices and a plan for managing the use of R-water. Food safety concerns are real because the properties downstream are farm lands. Food safety certifications may be jeopardized by potential contamination from R-water runoffs.

Does Tropic Land plan to have an automated irrigation system? If yes, then will Tropic Land use waste plan water to irrigate? Tropic Land must install a backflow preventer to eliminate cross contamination of the municipal water system if an automatic irrigation system is installed to irrigate the landscape.

Is the water supply to the proposed site adequate to meet needs and fire insurance requirements? If not, what plan does the BWS have to expand capacity or extend service?

Why does the project require 90% of all the available water to be used?

Will raw water for industrial use be drawn from wells on site?

Why does the document say wastewater from the industrial park will be typical of domestic wastewater? How is industrial wastewater like domestic wastewater?

How will the promises made in the second paragraph of section 4.46 be enforced?

Are there specific, funded plans for the expansion of the water supply to the project site?

Traffic Congestion

Please complete a traffic study for the anticipated increased traffic on H-1, Farrington Highway, Hakimo Road, and any other access ways.

Please disclose the understanding with the Navy for the use of the naval road. Can Tropic Land guarantee that the Hakimo Road will not be used?

The existing Hakimo roadway and the intersection of Farrington Highway are not adequate to serve the traffic to the proposed park, which will result in increased traffic flow through the residential community at the Princess Kahanu Estates.

The existing roadway is non-standard as it contains no drainage, no sidewalks, curbs, or gutters. Access to the PROPOSED project is via an existing NON-CITY-LIKE standard road. More discussion is warranted regarding the roadway and roadway improvements with Hakimo residents.

The number of employees, customers and suppliers associated with the park using the Hakimo Road access to the proposed project will inevitably increase.

Is the proposed site served adequately by access roads? Are there additional access roads planned?

Is traffic congestion a problem on the access road to the project? On state highways? In supplier areas? In market areas?

What are the road limits?

Sense of Community

Ulehawa is subject to multiple threats to health originating from increased heavy truck traffic adversely impacting the quality of life for residents. How does the project strive for a reduction in residents' exposure to air pollution from diesel particulate emissions?

Please demonstrate there is demand for industrial space at the back of a valley in Waianae. What is the economic feasibility of the park?

Industrial parks often offer desirable site characteristics to companies, such as proximity to existing industrial centers and easy access to transportation. The proposed project does not offer easy access for businesses, so why is the project sited here? If the proposed project proposes to link to regional businesses, which ones?

What is the demand to locating in a region far from the centers of commerce and with traffic access challenges?

Does our state general plan to regional development plan support urban development and industrial commercial growth moving into rural Waianae? Is there a plan in effect? Is there a plan proposed?

What is the non-market value of the open space that would be lost if the industrial park were built?

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs.

Does the proposed economic development project have a plan to reduce waste and increase resource efficiency? Does the project have a mindset to reach zero waste?

Is there a plan to coordinate the activities of the firms to increase efficient use of raw materials, reduce waste outputs, conserve energy and water resources, and reduce transportation requirements?

Companies co-locate so that water, energy sharing and recycling of low-value by-products become physically and economically feasible by closely coordinating their production processes and infrastructure to maximize efficiency.

Does the park have as its goal the elimination of wastes?

Does the change from agricultural to urban have lower environmental impact than traditional business ventures allowed on agricultural lands?

How does the park address factors contributing substantially to problems in recruitment of labor, access for outbound and inbound shipments, accessibility to business and professional services, access to an interstate highway, proximity to suppliers and/or distribution of products, etc.?

There are major environmental problems facing residents in Ulehawa. Where is the discussion on the management, the proposed industrial park policies and procedures, and technology transfer options for addressing these problems?.

Where is the discussion on the ratio of payoffs and risks and of unacceptable risk sharing and outcomes?

Where is the discourse and evaluation concerning whether the outcomes will lead to results that people expected and that the petitioner promised would result from the creation of a light industrial park in Ulehawa?

Where is the discussion on the "state of the art" in assessing outcomes and consequences and exploring their distributional effects?

Do all affected parties have equal access to the benefits and risks? Should there be equitable loss or gain compared to other parties is that distribution as a result of chance or to outcomes or both?

Where is the discussion to justify the risks to residents, the relative share of their risk compared to other parties, including the privilege of one party and the surplus risk of other parties?

The community benefit package provision is justification for and evidence that the developer recognizes that the developer benefits more from the project than any other party and asks the other parties to take a larger share of the risk than any other party. This arrangement can only be sustained if the inequitable additional benefits coming from an inequitable solution overcompensates the disadvantages associated with the inequalities stemming from this proposed

project for Ulehawa. Where is the discussion on the risk and benefits for farmers across and downwind from the development?

Where is the discussion of their participation and involvement in the decision-making process, design and agreement to the provisions for the community benefit package?

Where is the discussion that describes how the community benefit package system of delivery of benefits and services ensures that the unit making the key decision of having the most authority corresponds to the unit bearing the primary costs for the benefit?

Where is the assurance to prevent, minimize or eliminate mismatch and benefit spillover?

Because all humans are created equal and should have an equal share of the earth's resources in the absence of good reasons, the reliance on a community benefits package provision alone cannot legitimize inequitable solutions. Beyond voluntary agreements, is the situation in which the agreement is prepared free of coercion and unrelated to the status quo?

The developer needs to involve the community in the identification and development of models for compensating the community for its inequitable risk and benefits. Resolving the issue by paying monetary compensation to a community is regarded as distributing bribes. Where is the discussion for a model of joint ownership of the facility by developer and the community?

Where is the discussion about variability of options? This option provides two major benefits for the community: sharing the revenues and sharing control.

Where is the discussion about the set of criteria suitable for evaluating future industrial parks, such as easy access to transportation corridors, proximity to suppliers and/or markets, etc.? There is no discussion about the equity of exposure. Are all groups of the community or the respective constituency exposed in some way to the potential disadvantages of the proposed project? What means has the developer taken to avoid a distinction between more or less affected citizens? Shouldn't members of the more affected groups enjoy a higher probability of benefits?

Where is the discussion about quantifying and qualifying the market and nonmarket cost for the loss of the traditional and unique significance of the open space environmental amenities associated with the Maui accounts and its value to the emerging visitor market in Ko Olina?

Where is the discussion about the permissibility of a waste plant in an agricultural valley?

Where is the discussion about the "smart growth" and transit-oriented dependent development and its relevance to building our way out of congestion?

Please document the history of farming in Nanakuli. In recent history, the parcel of land proposed for development was used to raise crops of all kinds. In fact, throughout Hawaii's history, Nanakuli was recognized as a famed agricultural community with lush farms that helped

to feed the people of Oahu. With proper planning, Nanakuli can manage its economic development to provide jobs while re-embracing its farming history.

Why is this industrial park proposed for a property at the back of a valley in the middle of a rural residential and agricultural community? Please confirm that most industrial parks are located along major access routes – like highways – and near supply hubs.

The two alternative uses discussed in this document are golf course and industrial park. Why was farming not analyzed? Please compare the potential environmental risks and benefits of farming on this parcel of land with the consequences of establishing an industrial park.

Does the change from Agricultural to Urban have lower environmental impact than traditional business ventures allowed on Agricultural lands?

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs.

What is the non-market value of the open space that would be lost if the industrial park were built?

Produce a study to capture the observed historical economic development trends to forecast the vocational behavior of the individual households and firms in a construct consistent with economic theory to determine that the industrial park will create jobs accessory to the economic activities in the Waianae region?

Concern for the Cultural Resources of the Area

The consultant limits his/her historical cultural review to the human-built environment and fails to include, especially when dealing with ancient culture, those cultural aspects that persist in traditional stories beyond the physical man-made remnants, such as gods, natural phenomena, spirituality, etc. Because of this narrow evidence cited by the consultant the cultural significance of the area is ignored and diminished.

Bulldozing the hillsides of Lualualei for an industrial park will irreparably undermine the immense cultural significance of this region. The parcel Tropic Land seeks to urbanize, Lot 205A, is in the center of one of the most important viewpoints on the Waianae Coast.

The demigod Maui is a central figure in the cosmology of Native Hawaiians. He is the man that made the Hawaiian way of life possible, by snaring the sun in order to slow its path across the sky and lengthen the day for the benefit of all a Hawaiians. It is said that he was born along the hillsides of Lualualei.

Please document the extensive cultural history and traditional practices of the region affected by Tropic Land proposal.

Would the proposed industrial park block access to the Nioiula Heiau? What will be the access path to the Heiau if the project is allowed?

Where is the stone that Maui sunned himself on? What impact would the proposed project have on this sacred pohaku?

Where is the cave that Maui used as a child? What affect would the proposed project have on this cultural significant site?

What will Tropic Land do to protect Ulehawa stream if the proposed project is allowed?

What will Tropic Land do to preserve the many lo'i terraces documented in the area of the proposed project site?



KIMURA INTERNATIONAL INC.

April 16, 2010

Ms. Alice Greenwood
Concerned Elders of Waianae
87-576 Kula‘aupuni Street, C-101
Waianae, HI 96792

Dear Ms. Greenwood:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 7, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Questions are reviewed under the headings and in the order presented in your letter.

Concern for the Environment of Nanakuli

Please explain how a golf course is like an industrial park? It is not obvious why the document compares the previous proposed land use with this future proposed land use, when the two uses are dissimilar.

Response 1: The golf course is discussed as an alternative land use because the landowner has received entitlements to build such a project. *Section 4.2*

Endangered Species

What is the state of the endangered Nehe? How much land does the Nehe need to recover and be removed from the endangered species list? What impact will construction of this industrial park have on the survival and recovery of this endangered plant species?

What impact will construction on this site have on the ecology downhill? Sacred designations for land usually have practical implications. This land was set aside as sacred, which may indicate that disturbing the soil here might have detrimental consequences on the land and ocean below it.

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Response 2: There are no threatened or endangered species in the project area. The proposed industrial park will not adversely affect any threatened or endangered species or critical habitat. *Sections 5.5 and 5.6*

Air Pollution

We have concerns about the increase to annual average for particulate, sulfur dioxide and increased annual averages of daily maximum one-hour values recorded for ozone and carbon monoxide, especially because the air quality along Farrington Highway of [sic] Lualualei Naval Road is already highly impacted by heavy vehicle emissions of diesel particulates.

If this project proceeds, then an air quality monitoring station must be established.

Please assess the exposure that residents, especially children and the elderly, will suffer from due to the environmental impact of truck emission and exhaust.

Response 3: Operations of the proposed light industrial park, including increased truck emission and exhaust, are not expected to generate long-term adverse effects on air quality. *Section 5.10*

Waste Water

What is the general drainage pattern of the project site? Where is the nearest storm drain connection? What are your plans for the municipal storm drain?

Will the project be allowed to increase surface runoff onto adjoining properties or rights-of-way? When the property increases the amount of paving the runoff concerns are real. Where will the surface waters be directed?

Response 4: Drainage facilities constructed for the project will not be connected to the municipal storm drain system. Retention facilities will be constructed to retain increases in storm drainage runoff that occur as a result of the proposed project (i.e., to preclude a net increase in runoff). Under existing conditions, runoff from the property is conveyed across Lualualei Naval Access Road through culverts. On the north side of the road, runoff flows through Ulehawa Stream, the natural drainage way. *Sections 3.1 and 5.3*

Currently the Lualualei Booster Station has a limited capacity of 25,000 GPD whereas the project water demand is estimated at a peak demand of 67,650 GPD. Is there a requirement for the Lualualei Booster Station to be upgraded to handle the additional demand?

Will the proposed wastewater system be sized for the peak-hour demand of 67,650 GPD? If not, how will anything greater than 22,250 GPD be handled?

Response 5: All wastewater generated by the proposed development will be processed by an on-site wastewater treatment facility. There will be no impact on the municipal wastewater system. *Sections 3.1 and 5.15.2*

The existing water system provides a 2200 GPM flow to a fire hydrant at Paakea Road and Hakimo Road. If the project requires 4000 GPM over a three-hour duration for fire, how can the proposed 16-inch line be proposed provide more water than what is available without impact to the Board of Water Supply? Who will pay for improvements to provide 4000 GPM at the point where the project will pick up the water line?

Response 6: The developer will construct the 16-inch water line to be connected to the existing 20-inch water main at the intersection of Paakea Road and Hakimo Road.

How did the developer determine the size of the waste treatment facility? Is it based on the anticipated square footage of the park? Is it based on flow? There is insufficient information about the design and what types of waste will be produced and flushed into the waste plant—human and non-human.

Response 7: The preliminary size of the wastewater treatment facility was calculated by a licensed civil engineer based on a projected *de facto* population. *Appendix A, Preliminary Engineering Report*

What is the reduction to potable water need by using non-potable water from the treated wastewater effluent?

Response 8: Non-potable water will replace the use of potable water for irrigation.

Has the State Department of Health approved CBT systems for other private developments? Can you give valid working examples?

Response 9: Use of the cyclic biological treatment (CBT) process for wastewater treatment is not uncommon in Hawaii. Among other locations, this process is being used at Sea Life Park, Makaha East Country Club, Waialua Ocean Villas, and the Ponds at Punaluu.

Most sludge from the City and County managed wastewater treatment facilities are “dried” for a period of time prior to disposal. Will this facility do the same? If so, is there sufficient area allowed for this process?

Response 10: If sludge needs to be removed from the treatment plant, the process will be in compliance with applicable regulations.

Who will own and operate this facility?

Response 11: The facility will be owned and operated by the condominium owners association. *Section 3.1*

Why is the wastewater treatment plant located directly across from properties used for farming?

Response 12: The wastewater system will be designed as a gravity flow system; therefore, the treatment plant is located where ground elevation is lowest. The underground tank will watertight and mechanical equipment enclosed in a structure. *Section 5.15.2*

Will there be secondary treatment of the effluent proposed by the proposed project?

Can the non-potable water be used for other purposes separate from irrigation? For example, should there be contingencies made so that it may be used for toilet purposes or other industrial purposes, i.e., washing of vehicles?

Response 13: Other uses of treated effluent, in addition to irrigation, will be explored.

How will the community be protected from hazardous material used at the proposed project site? Will the project owner and/or operator prevent businesses in this industrial park from generating hazardous waste, especially since the community may not know what hazardous waste is being generated unless they go through every business permit for all the businesses located at the baseyard?

Will the project owner and/or operator also prohibit medical wastes from being produced or stored on the proposed site? Other industrial park locations in Hawaii have had incidents of medical waste being stored improperly for prolonged periods of time.

Response 14: All unit owners will be required to comply with State and federal regulations for the handling, storage, treatment, transport, and disposal of hazardous wastes and medical wastes. *Section 5.15.4*

There is no mention of any waste generated could be sent to PVT. What if there is C&D waste generated by a specific business, e.g., recycling construction materials? Will this be handled by individual businesses?

Response 15: Construction and demolition debris will be disposed of at PVT, the only facility for these types of waste on the island.

In section 4-15.5, please correct: It is not the Mikiloa Substation but should be Mikilua.

Response 16: Correction has been made.

When will they have commitments from HECO, Hawaiian Telcom and Oceanic Time Warner to provide connections?

Response 17: Coordination with utility companies for provision of electrical and telecommunication services will occur during the detailed design and engineering phase of the project.

There should be a requirement for green construction of facilities. If it is not required, it will not be done because it is not necessarily seen as cost effective in the short term.

What is being done to reduce the normal carbon footprint of a light industrial park?

Response 18: To reduce the waste stream, Tropic Land will develop a recycling plan for the construction and operational phases of the project. Where possible and appropriate, the project will specify or use products with recycled content, such as pavement material, concrete aggregate fill, and steel. *Section 5.15.4*

Stormwater management: How will storm water management be managed for each lot and then subsequently for the entire property? Who will be responsible in the long term? Where will the storm water go?

Response 19: An integrated system of drainage facilities will be developed for the overall project. The condominium owners association will be responsible for long-term management of drainage facilities.

There is discussion regarding a detention area of an approximately 100-foot wide strip of land mauka of the industrial lots to accommodate peak runoff from the hillside. While this may handle the amount of flow that will occur based on the undeveloped hillside and the developed lots, this should be a retention basin considering the pollutants that may (probably will) occur based on the businesses that can be anticipated to be located within the baseyard. This becomes important; especially if it is possible that hazardous waste may be generated on site (see section 4-15.4).

Will collection/separation systems be established to separate and collect contaminants from impermeable surfaces in the industrial park so they do not go down the drain with the storm water runoff.

Response 20: The drainage system will handle storm water flows in accordance with City regulations and professional engineering standards. There will be no connection to municipal storm drains. *Sections 3.1 and 5.3*

Ground & Soil

Does Tropic Land have plans to remove the soil?

For slab-on-grade construction, what plans do you have for altering the topography (excavating, filing [*sic*], and grading)?

How many acres does Tropic Land plan for soil disturbance? If it's greater than one acre, Tropic Land will need NPDES permit

Please conduct a soil study. The soil on this lot is not adequate for safely constructing warehouses, as Tropic Land proposes to do.

Response 21: According to preliminary estimates, grading will involve approximately 450,000 cubic yards. *Section 5.1*

Tropic Land anticipates the need for a NPDES permit. *Section 1.6*

A geotechnical study will be conducted during the project design phase. *Section 5.4*

Concern for the Quality of Life in Nanakuli

The proposed industrial park is out of sync with the rural, agriculture lifestyle of Lualualei Valley residents.

Response 22: Comment noted.

Noise

The project is not in a highly developed area. Existing ambient noise levels are relatively low. The noise sources will increase from traffic noise due to large volumes of traffic and heavy vehicles that will use Hakimo Road, the primary traffic access to the project.

What are your hours of operation?

Please estimate the number of trucks that will access the proposed project.

Response 23: According to the Traffic Impact Assessment Report, the project is expected to generate 522 vehicles during the peak morning period and 518 vehicles during the peak afternoon period. Tropic Land intends to use Lualualei Naval Access Road as the primary access for the project. The U.S. Navy has agreed to grant an association of adjoining property owners, including Tropic Land, a long term easement to use Lualualei Naval Access Road. Therefore, Hakimo Road is not expected to experience large volumes of traffic and noise from heavy trucks. Companies located at the light industrial park are anticipated to keep normal business hours. *Section 5.11*

Water Supply

The project is not served by the existing water lines and water meters. How will buildings be served if there are no existing laterals for water lines?

Are the existing water lines for agricultural lots of sufficient size and adequate to serve the urban needs of the new buildings to be constructed and the changed uses of the new users who occupy them?

Response 24: Tropic Land will construct laterals off the new 16-inch water main that, in turn, will connect to the existing 20-inch water main at the intersection of Paakea Road and Hakimo Road.

Tropic land will use sub-standard quality water to irrigate the project which will require better management practices and a plan for managing the use of R-water. Food safety concerns are real because the properties are downstream from farm lands. Food safety certifications may be jeopardized by potential contamination from R-water runoffs.

Does Tropic Land plan to have an automated irrigation system? If yes, then will Tropic Land use waste plan water to irrigate? Tropic Land must install a backflow preventer to eliminate cross contamination of the municipal water system if an automatic irrigation system is installed to irrigate the landscape.

Response 25: Tropic Land will comply with the requirements for safe and proper use of recycled water, as regulated by the Hawaii State Department of Health under Title 11, Chapter 62, Hawaii Administrative Rules.

Is the water supply to the proposed site adequate to meet needs and fire insurance requirements? If not, what plan does the BWS have to expand capacity or extend service?

Why does the project require 90% of all the available water to be used?

Response 26: The water system will be designed to meet fire flow capacity. Construction plans for the project's water system must be reviewed and approved by the Honolulu Fire Department and Board of Water Supply.

Will raw water for industrial use be drawn from wells on site?

Response 27: Existing wells on site are capped and will remain capped.

Why does the document say wastewater from the industrial park will be typical of domestic wastewater? How is industrial wastewater like domestic wastewater?

Response 28: It is expected that wastewater will be generated primarily by employees (rather than industrial processes) and, therefore, is characterized as domestic.

How will the promises made in the second paragraph of section 4.46 be enforced?

Response 29: The DEIS did not have a Section 4.46, but we are assuming this question relates to Section 4.16 regarding placement of the treatment unit below ground and landscaping around the perimeter fence. An underground treatment tank is standard design for the proposed cyclic biological treatment technology. Landscaping is planned for the entire length of the Lualualei Naval Access Road frontage—not only the wastewater treatment area—and will incorporate palm trees that are already planted.

Are there specific, funded plans for the expansion of the water supply to the project site?

Response 30: Extension of water service to the project site will be funded solely by Tropic Land.

Traffic Congestion

Please complete a traffic study for the anticipated increased traffic in H-1, Farrington Highway, Hakimo Road, and any other access ways.

Response 31: A traffic impact assessment report has been completed (The Traffic Management Consultant, January 2010, *Appendix E*) and included in the FEIS.

Please disclose the understanding with the Navy for the use of the naval road. Can Tropic Land guarantee that the Hakimo Road will not be used?

The existing Hakimo roadway and the intersection of Farrington Highway are not adequate to serve the traffic to the proposed park, which will result in increased traffic flow through the residential community at the Princess Kahanu Estates.

The existing roadway is non-standard as it contains non drainage, no sidewalks, curbs, or gutters. Access to the PROPOSED project is via an existing NON-CITY-LIKE standard road [*emphasis in original*]. More discussion is warranted regarding the roadway and roadway improvements with Hakimo residents.

The number of employees, customers and suppliers associated with the park using the Hakimo Road access to the proposed project will inevitably increase.

Is the proposed site served adequately by access roads? Are there additional access roads planned?

Is traffic congestion a problem on the access road to the project? On state highways? In supplier areas? In market areas?

What are the road limits?

Response 32: Tropic Land intends use Lualualei Naval Access Road as the primary access road for the project. Correspondence related to the use of Lualualei Naval Access Road between the Navy and Tropic Land is included in *Appendix K* of the FEIS. Specific improvements to Farrington Highway and Lualualei Naval Access Road will be determined in consultation with the Navy, Hawaii State Department of Transportation, and other stakeholders.

Sense of Community

Ulehawa is subject to multiple threats to health originated from increased heavy truck traffic adversely impacting the quality of life for residents. How does the project strive for a reduction in residents' exposure to air pollution from diesel particulate emissions?

Response 33: The FEIS concludes that project-related air quality impacts will not be significant, and that emission concentrations will be within State and federal air quality standards. *Section 5.10*

Please demonstrate there is demand for industrial space at the back of a valley in Waianae. What is the economic feasibility of the park?

Industrial parks often offer desirable site characteristics to companies, such as proximity to existing industrial centers and easy access to transportation. The proposed project does not offer easy access for businesses, so why is the project sited here? If the proposed project proposes to link to regional businesses, which ones?

What is the demand to locating in a region far from the centers of commerce and with traffic access challenges?

Response 34: Twenty-one businesses have expressed interest in acquiring one or more units in the proposed light industrial park. Because Tropic Land intends to offer units in the industrial park for sale on a condominium basis, Tropic Land cannot offer units for sale until the Real Estate Commission has issued a Condominium Public Report for the project. Nonetheless these businesses have serious interest and provided contact information to receive a Public Report. They are in the following types of business: trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). All uses would conform to the proposed zoning classification of I-1, Limited Industrial District. Fifteen of the 21 businesses reported current addresses in Waianae. Six businesses are currently located in other regions, such as Honolulu, Aiea, Pearl City, Ewa Beach, and Kapolei. *Chapter 2*

Does our state general plan to regional development plan support urban development and industrial commercial growth moving into rural Waianae? Is there a plan in effect? Is there a plan proposed?

Response 35: Conformance with the Hawaii State Plan, Oahu General Plan, and Waianae Sustainable Communities Plan is discussed in *Chapter 6* of the FEIS. Tropic Land's application to amend the Rural Community Boundary in the Waianae Sustainable Communities Plan is being considered as part of the ongoing five-year review process.

What is the non-market value of the open space that would be lost if the industrial park were built?

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs?

Response 36: Food security is an issue of statewide importance. However, first-hand accounts of farming experience on the project indicate that only 15-17 acres were cultivated, though unprofitably. Given the availability of farmland with higher quality soils and irrigation water elsewhere on Oahu and throughout the state, the small amount of agricultural land on the project site will not resolve larger food concerns. *Appendix L, Statements on Past Farming Activity*

Does the proposed economic development project have a plan to reduce waste and increase resource efficiency? Does the project have a mindset to reach zero waste?

Is there a plan to coordinate the activities of the firms to increase efficient use of raw materials, reduce waste outputs, conserve energy and water resources, and reduce transportation requirements?

Does the park have as its goal the elimination of wastes?

Response 37: To reduce the waste stream, Tropic Land will develop a recycling plan for the construction and operational phases of the project. Where possible and appropriate, Tropic Land will specify or use products with recycled content, such as pavement material, concrete aggregate fill, and steel. *Section 5.15.4*

Does the change from agricultural to urban have lower environmental impact than traditional business ventures allowed on agricultural lands?

Response 38: Impacts and benefits would differ between light industrial businesses and agricultural businesses. *Section 4.3*

How does the park address factors contributing substantially to problems in recruitment of labor, access for outbound and inbound shipments, accessibility to business and professional services, access to an interstate highway, proximity to suppliers and/or distribution of products, etc?

There are major environmental problems facing residents in Ulehawa. Where is the discussion on the management, the proposed industrial park policies and procedures, and technology transfer options for addressing these problems?

Where is the discussion on the ratio of payoffs and risks and of unacceptable risk sharing and outcomes?

Where is the discourse and evaluation concerning whether the outcomes will lead to results that people expected and that the petitioner promised would result from the creation of a light industrial park in Ulehawa?

Where is the discussion on the “state of the art” in assessing outcomes and consequences and exploring their distributional effects?

Do all affected parties have equal access to the benefits and risks? Should there be equitable loss or gain compared to other parties is that distribution as a result of chance or to outcomes or both?

Where is the discussion to justify the risks to residents, the relative share of their risk compared to other parties, including the privilege of one party and the surplus risk to other parties?

Response 39: Economic and income benefits are discussed in *Section 5.13*

The community benefit package provision is justification for and evidence that the developer recognizes that the developer benefits more from the project than any other party and asks the other parties to take a larger share of the risk than any other party. This arrangement can only be sustained if the inequitable additional benefits coming from an inequitable solution overcompensates the disadvantages associated with the inequalities stemming from this proposed project for Ulehawa. Where is the discussion on the risk and benefits for farmers across and downwind from the development?

Where is the discussion of their participation and involvement in the decision-making process, design and agreement to the provisions for the community benefit package?

Where is the discussion that describes how the community benefit package system of delivery of benefits and services ensures that the unit making the key decision of having the most authority corresponds to the unit bearing the primary costs for the benefit?

Where is the assurance to prevent, minimize or eliminate mismatch and benefit spillover?

Because all humans are created equal and should have an equal share of the earth’s resources in the absence of good reasons, the reliance on a community benefits package provision alone

cannot legitimize inequitable solutions. Beyond voluntary agreements, is the situation in which the agreement is prepared free of coercion and unrelated to the status quo?

The developer needs to involve the community in the identification and development of models for compensating the community for its inequitable risk and benefits. Resolving the issue by paying monetary compensation to a community is regarded as distributing bribes. Where is the discussion for a model of joint ownership of the facility by developer and the community?

Where is the discussion about variability of options? This option provides two major benefits for the community: sharing the revenues and sharing control.

Where is the discussion about the set of criteria suitable for evaluating future industrial parks, such as easy access to transportation corridors, proximity to suppliers and/or markets, etc? There is no discussion about the equity of exposure. Are all groups of the community or the respective constituency exposed in some way to the potential disadvantages of the proposed project? What means has the developer taken to avoid a distinction between more or less affected citizens? Shouldn't members of the more affected groups enjoy a higher probability of benefits?

Response 40: The community benefits package represents Tropic Land's efforts to support and enhance the life of the community of which it is a part. Although the specific structure of the fund has not been determined yet, Tropic Land expects that local residents will participate in its management.

Where is the discussion about quantifying and qualifying the market and nonmarket cost for the loss of the traditional and unique significance of the open space environmental amenities [sic] associated with the Maui accounts and its values to the emerging visitor market in Ko Olina?

Response 41: Non-market values are discussed in *Section 5.8* on archaeological, historical, and cultural resources and in *Section 5.12* on visual resources.

Where is the discussion about the permissibility of a waste plant in an agricultural valley?

Response 42: Uses in the proposed light industrial park will be governed by the I-1, Limited Industrial zoning classification being sought by Tropic Land. A "waste plant" with significant environment impacts is not acceptable in the I-1 zone nor is it desired by Tropic Land.

Where is the discussion about the "smart growth" and transit-oriented dependent development and its relevance to building our way out of congestion?

Response 43: "Smart growth" and transit-oriented development concepts are typically applied to residential projects. However, to the extent that smart growth encourages a more diverse mix and integration of land uses, and proximity between residences and

workplaces to reduce commute distances, the proposed action is consistent with smart growth objectives.

Please document the history of farming in Nanakuli. In recent history, the parcel of land proposed for development was used to raise crops of all kinds. In fact, throughout Hawaii's history, Nanakuli was recognized as a famed agricultural community with lush farms that that helped to feed the people of Oahu. With proper planning, Nanakuli can manage its economic development to provide jobs while re-embracing its farming history.

Why is this industrial park proposed for a property at the back of a valley in the middle of a rural residential and agricultural community? Please confirm that most industrial parks are located along major access routes—like highways—and near supply hubs.

The two alternative uses discussed in this document are golf course and industrial park. Why was farming not analyzed? Please compare the potential environmental risks and benefits of farming on this parcel of land with the consequences of establishing an industrial park.

Does the change from Agricultural to Urban have lower environmental impact than traditional business ventures allowed on Agricultural lands?

Response 44: Alternatives to the proposed action are discussed in an expanded Chapter 4, including a discussion of the project area's agricultural history and potential. Interviews were conducted with three people who have first-hand knowledge of and/or experience with on-site farming activities. Their statements have been appended to the FEIS (*Appendix L*). The historical information dates back approximately 60 years, during which the site accommodated two small truck farms. The Araki farm lasted for approximately 25 years on 17 acres, followed by the brief tenure of the Higa farm which ceased operations in 1988. The truck farms experimented with corn, watermelon, round onions, bell peppers, cucumber, tomatoes, and green onions. The Arakis tried a variety of intensive farming methods and diversified by herding goats and keeping beehives. Although the Arakis operated successful farms in Makaha—both before and after their Lualualei experience—farming on the project site was unprofitable.

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs.

Response 45: See Response 36.

What is the non-market value of the open space that would be lost if the industrial park were built?

Response 46: See Response 41.

Produce a study to capture the observed historical economic development trends to forecast the vocational behavior of the individual households and firms in a construct consistent with economic theory to determine that the industrial park will create jobs accessory to the economic activities in the Waianae region?

Response 47: The types of jobs foreseen are related to the types of businesses that have already expressed interest in locating at the proposed industrial park. The following table lists representative occupational titles with corresponding median hourly wages, based on statistics for the Honolulu Metropolitan Statistical Area (MSA) compiled by the State of Hawaii, Department of Labor and Industrial Relations (*Occupational Employment and Wages in Hawaii, 2008*).

Occupational Title	Hourly Median Wage (\$)
Stonemasons	27.19
Cement masons and concrete finishers	27.75
Construction laborers	23.38
Paving, surfacing, tamping equipment operators	34.78
Electricians	28.79
Painters, construction and maintenance	24.40
Landscaping, grounds maintenance workers	13.05
Truck drivers, heavy and tractor-trailer	18.38
Industrial truck and tractor operators	16.32
Material moving workers, all others	22.04
Total, all occupations	16.38

Concern for the Cultural Resources of the Area

Please document the extensive cultural history and traditional practices of the region affected by the Tropic Land proposal.

Would the proposed industrial park block access to the Nioiula Heiau? What will be the access path to the Heiau if the project is allowed?

Where is the stone that Maui sunned himself on? What impact would the proposed project have on this sacred pohaku?

Where is the cave that Maui used as a child? What affect would the proposed project have on this cultural significant site/

Response 48: Cultural resources are documented in the cultural impact assessment (JLK Management, LLC and Mother Earth Foundation, July 2009 in *Appendix G*). The stone that Maui sunned himself on and the cave that Maui used as a child are not within, nor in proximity to, the project area. The project site does not provide traditional access to Nioiula Heiau.

What will Tropic Land do to protect Ulehawa stream if the proposed project is allowed?

Response 49: A buffer area has been established around Ulehawa Stream which provides a setback for future development.

What will Tropic Land do to preserve the many lo'i terraces documented in the area of the proposed project site?

Response 50: Based on a comprehensive archaeological study (Cultural Surveys Hawaii, January 1991 in *Appendix F*), there is no evidence of lo'i being located on the project site. The State Historic Preservation Division has concluded that the proposed action will not adversely impact significant historical resources.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission



KAHEA

THE HAWAIIAN-ENVIRONMENTAL ALLIANCE

January 7, 2010

Mr. Glenn Kimura
1600 Kapiolani Boulevard, Suite 1610
Honolulu, HI 96814

Aloha Mr. Kimura,

PROTECTING

NATIVE HAWAIIAN

CUSTOMARY &

TRADITIONAL RIGHTS

AND OUR FRAGILE

ENVIRONMENT

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KAHEA: the Hawaiian-Environmental Alliance is a non-profit 501(c)3 working to protect the unique natural and cultural resources of the Hawaiian islands. KAHEA translates to english as "the call."

Happy Holidays! Mahalo for providing this opportunity to comment on the Draft Environmental Impact Statement your company drafted for Tropic Land, LLC's proposed industrial park in Wai'anae. Over the holidays, we reviewed this document, consulted with residents, kupuna, and cultural practitioners. We heard many concerns about this proposal – from poor wastewater management plans to health threats posed to nearby residents. We hope that you and Tropic Land, LLC will fully address these concerns before proceeding with any activities on this parcel. To aid this effort, we contribute the following comments.

I. Proposed Industrial Park Inconsistent with the Wai'anae Community Sustainability Plan

The industrial park proposed by Tropic Land, LLC cannot be built – without violating the law – because it is inconsistent with the current Wai'anae Community Sustainability Plan. This plan, developed by the residents, determines the general planning for the entire Wai'anae Coast community. All decisions made about how land use designations are changed or implemented are determined by this plan, including boundary amendments by the Land Use Commission.

The parcel at issue in this DEIS, parcel 205A, is currently zoned for agricultural uses, like farming. It cannot be used for activities meant only for urban areas, such as industrial parks and landfills. The permits necessary to operate a legal industrial park require that the industrial park be located on properly zoned land.

While Tropic Land, LLC has petitioned for a "boundary amendment" to change the zoning for this parcel from agricultural to urban, the Land Use Commission cannot grant this request because the current Wai'anae Community Sustainability Plan set parcel 205A aside for agricultural use only. Tropic Land, LLC should either find a more appropriate parcel for the proposed industrial park or find more suitable uses for parcel 205A.

II. Inadequate Cultural Impact Assessment

The 11-page Cultural Impact Assessment conducted for this proposed project does not adequately document the extensive and rich cultural history of Lualualei Valley. There are many mo'olelo and mele about the importance of the Wai'anae Coast. The assessment included in this document, however, only briefly mentions the demigod Maui. In fact, Lualualei played a very important role in Maui's life. There are known cultural sites on and around the parcel at issue in this document that were not assessed. This serious oversight must be addressed before this document can be considered adequate.

III. Inadequate Alternative Analysis

The Hawai'i Environmental Policy Act requires that the project proponent consider alternatives when assessing the environmental and cultural consequences of a proposal. From our review of the DEIS, only two possibilities were considered: 1) a golf course, 2) an industrial park. The golf course alternative was immediately dismissed based on the previous landowner's failure establish a golf course. While it is wise to not repeat the mistakes of one's predecessors, that alone does not satisfy the legal requirements for a thorough analysis of alternatives to the preferred action.

Considering this parcel was used extensively for agricultural activities since ancient times to the 1980's, why was farming not considered as an alternative in the DEIS? Given the renaissance of farming in Hawai'i, agricultural sublots can provide the same economic benefits of an industrial park without the detrimental consequences.

A far more deliberative and useful analysis of alternative uses for parcel 205A must be conducted before this DEIS can be considered adequate.

We look forward to your responses to these questions and the many others that have been raised by the residents of Ulehawa and all of Wai'anae.

Mahalo,



Marti Townsend
Program Director



KIMURA INTERNATIONAL INC.

April 16, 2010

Ms. Marti Townsend, Program Director
KAHEA
P.O. Box 37368
Honolulu, HI 96837

Dear Ms. Townsend:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 8, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. The industrial park proposed by Tropic Land, LLC cannot be built—without violating the law—because it is inconsistent with the current Waianae Community Sustainability Plan.

Response: Tropic Land recognizes that the Waianae Sustainable Communities Plan must be amended to proceed with the project, and has submitted an application to the Honolulu Department of Planning and Permitting to amend the Waianae Sustainable Communities Plan. DPP's Public Review Draft Amendments to the Waianae Sustainable Communities plan (2009) shows an industrial park as an optional land use for the site.

2. The 11-page Cultural Impact Assessment conducted for this proposed project does not adequately document the extensive and rich cultural history of Lualualei Valley.

Response: Determining the value of cultural significance is a subjective undertaking. There can be discrepancies between concrete evidence of historical use and mythology (*mo'olelo*). Based on Tropic Land's proposed design and use for the property, the authors of the Cultural Impact Assessment affirm their conclusion that the project will have no adverse effect on cultural resources. The State Historic Preservation Division has concluded that the proposed action will not adversely impact significant historical resources.

1600 Kapiolani Blvd., Suite 1610
Honolulu, HI 96814
Tel: 808 944-8848 • Fax: 808 941-8999

3. Considering this parcel was used extensively for agricultural activities since ancient times to the 1980's, why was farming not considered as an alternative in the DEIS? A far more deliberative and useful analysis of alternative uses for parcel 205A must be conducted before this DEIS can be considered adequate.

Response: In an effort to investigate agricultural feasibility, interviews were conducted with three people who have first-hand knowledge of and/or experience with farming activities on the project site. Their statements have been appended to the FEIS (Appendix L). The historical information dates back approximately 60 years, reflecting contemporary market and technological conditions. Over this time period, the site has accommodated two small truck farms. The Araki farm lasted for approximately 25 years on 17 acres, followed by the brief tenure of the Higa farm which ceased operations in 1988. The truck farms experimented with corn, watermelon, round onions, bell peppers, cucumber, tomatoes, and green onions. No crop was successful due to adverse conditions. The Arakis tried a variety of intensive farming methods and diversified by herding goats and keeping beehives. Although the Arakis operated successful farms in Makaha—both before and after their Lualualei experience—farming on the project site was unprofitable.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC

Letters with No Substantive Comments

Federal Agencies

- U.S. Army Corps of Engineers, Civil Works Branch

State Agencies

- Department of Accounting and General Services
- Department of Labor and Industrial Relations
- Division of Forestry and Wildlife

City Agencies

- Department of Design and Construction
- Design of Facility Maintenance
- Department of Parks and Recreation
- Police Department

Utility Companies

- Hawaiian Telcom



REPLY TO
ATTENTION OF: CEPOH-EC-T

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT
FORT SHAFTER, HAWAII 96858-5440

December 2, 2009

Civil Works Technical Branch

RECEIVED DEC 02 2009

Mr. Glenn T. Kimura, President
Kimura International
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96814

Dear Mr. Kimura:

Thank you for your letter dated November 20, 2009 regarding the Draft Environmental Impact Statement for the Nanakuli Community Baseyard Project, Lualualei, Oahu (TMK 8-7-9: 2). We do not have any additional comments to offer beyond those previously submitted on May 27, 2009.

Should you require additional information, please call Ms. Jessie Dobinchick of my staff at 438-8876.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven H. Yamamoto".

Steven H. Yamamoto, P.E.
Chief, Civil Works Technical Branch

LINDA LINGLE
GOVERNOR



RUSS K. SAITO
COMPTROLLER
SANDRA L. YAHIRO
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)1320.9

DEC - 8 2009

Mr. Glenn Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96813

Dear Mr. Kimura:

Subject: Draft Environmental Impact Statement (DEIS)
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu
TMK: (1) 8-7-09:02 (portion)

Thank you for the opportunity to comment on this DEIS. The Department of Accounting and General Services' has no projects or facilities in this area, and we have no comments at this time.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,

RUSS K. SAITO
State Comptroller

c: Ms. Katherine Kealoha, DOH-OEQC
Mr. Dan Davidson, Land Use Commission
Mr. Abbey Seth Meyer, Office of Planning

LINDA LINGLE
GOVERNOR



DARWIN L.D. CHING
DIRECTOR

COLLEEN Y. LaCLAIR
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS

830 PUNCHBOWL STREET, ROOM 321
HONOLULU, HAWAII 96813
www.hawaii.gov/labor
Phone: (808) 586-8842 / Fax: (808) 586-9099
Email: dliir.director@hawaii.gov

December 17, 2009

RECEIVED DEC 19 2009

Mr. Glenn T. Kimura
Kimura International, Inc
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96813

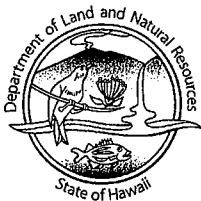
Dear Mr. Kimura

In accordance with your request dated November 20, 2009, the Department of Labor and Industrial Relations has no comments or recommendation regarding the "draft environmental impact statement for the Nanakuli Community Baseyard".

Should you or staff have questions, please contact me 586-8844, or Mr. Patrick Fukuki, our Business Management Officer, at 586-8888.

Sincerely,

DARWIN L.D. CHING



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 25, 2009

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division -

RECEIVED
LAND DIVISION
2009 NOV 31 P 1:33
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

FROM: *ja* Morris M. Atta *Charlene*
SUBJECT: Draft Environmental Impact Statement for Nanakuli Community Baseyard
LOCATION: Island of Oahu
APPLICANT: Kimura International, Inc. on behalf of Tropic Land LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by January 3, 2010.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

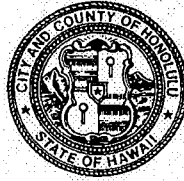
- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *Paul J. Loomis*
Date: *11/30/09*

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

MUFI HANNEMANN
MAYOR



CRAIG I. NISHIMURA, P.E.
DIRECTOR

COLLINS D. LAM, P.E.
DEPUTY DIRECTOR

January 29, 2010

RECEIVED FEB 04 2010

Mr. Glenn T. Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96814


Dear Mr. Kimura:

Subject: Draft Environmental Impact statement (DEIS)
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu
TMK: (1) 8-7- 09: 02 (por.)

Thank you for inviting us to review the above Draft Environmental Assessment. The Department of Design and Construction does not have any comments to offer at this time.

Should you have any questions, please contact me at 768-8480.

Very truly yours,


Craig I. Nishimura, P.E.
Director

CN:pg(342670)

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

MUFI HANNEMANN
MAYOR

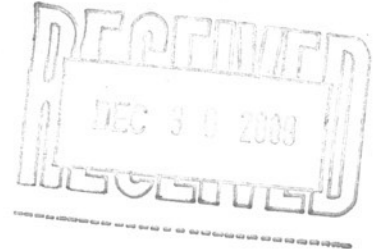


JEFFREY S. CUDIAMAT, P.E.
DIRECTOR AND CHIEF ENGINEER

GEORGE "KEOKI" MIYAMOTO
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 09-1178

December 30, 2009



Mr. Glenn Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96813

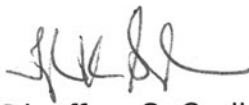
Subject: Draft Environmental Impact Statement (DEIS)
Nanakuli Community Baseyard, Lualualei, Oahu, Hawaii
Tax Map Key: (1) 8-7-09: 02 (por.)

Thank you for the opportunity to review and comment on the DEIS dated November 2009 for the proposed Nanakuli Community Baseyard project.

We have no comments to offer as the proposed improvements will be located within privately-owned property and will have negligible impact on our facilities and operations. It is our understanding the proposed on-site project roadways, parking areas, drainage system, and other roadway improvements will be privately-owned and maintained and will not be dedicated to the City.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3697.

Sincerely,


sw Jeffrey S. Cudiamat, P.E.
Director and Chief Engineer

c: Land Use Commission
Office of Planning

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 309 • KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3003 • FAX: (808) 768-3053 • CITY WEB SITE: www.honolulu.gov



MUFI HANNEMANN
MAYOR

LESTER K. C. CHANG
DIRECTOR

RICHARD HARU
DEPUTY DIRECTOR

November 27, 2009

RECEIVED DEC 03 2009

Mr. Dan Davidson, Executive Officer
Land Use Commission
235 Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Davidson:

Subject: Draft Environmental Impact Statement
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the Nanakuli Community Baseyard.

The Department of Parks and Recreation has no comment as the proposed project will not impact any program or facility of the department. You may remove us as a consulted party to the balance of the EIS process.

Should you have any questions, please contact Mr. John Reid, Planner, at 768-3017.

Sincerely,

A handwritten signature in black ink, appearing to read "Lester K. C. Chang", is written over a large, stylized flourish that extends to the right.

LESTER K. C. CHANG
Director

LKCC:jr
(342742)

cc: Mr. Glenn Kimura, Kimura International, Inc.
Mr. Abbey Seth Mayer, Office of Planning

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulu.org

MUFI HANNEMANN
MAYOR



LOUIS M. KEALOHA
CHIEF

PAUL D. PUTZULU
KARL A. GODSEY
DEPUTY CHIEFS

OUR REFERENCE BS-DK

November 25, 2009

RECEIVED NOV 30 2009

Mr. Dan Davidson, Executive Director
Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Davidson:

This is in response to a letter from Kimura International, Inc., requesting comments on a Draft Environmental Impact Statement for the Nānākuli Community Baseyard project.

The Honolulu Police Department has no comments to offer at this time.

If there are any questions, please call Mr. Brandon Stone of the Executive Bureau at 529-3644.

Sincerely,

LOUIS M. KEALOHA
Chief of Police

By 
DEBORA A. TANDAL
Assistant Chief of Police
Support Services Bureau

cc: Mr. Glenn T. Kimura
Kimura International, Inc.

Mr. Abbey Seth Mayer
Department of Business, Economic
Development, and Tourism

Hawaiian Telcom ●

December 3, 2009

RECEIVED DEC 05 2009

Land Use Commission
235 S. Beretania Street, Room 406
Honolulu, HI 96813
Attention: Mr. Dan Davidson, Executive Officer

Dear Mr. Davidson:

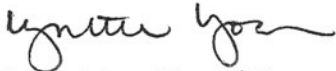
Subject: **Nanakuli Community Base Yard**
Draft Environmental Impact Statement

Thank you for the opportunity to review and comment on the subject project.

Hawaiian Telcom does not have any comments to offer at this time. Please continue to include us during the design stages of the project.

If you have any questions or require assistance in the future on this project, please call Les Loo at 546-7761.

Sincerely,



Lynette Yoshida
Senior Manager - OSP Engineering
Network Engineering & Planning

cc: G. Kimura - Kimura International, Inc.
A. S. Mayer - Office of Planning
File [Nanakuli]