February 23, 1987

John C. Lewin, M.D.
Director of Health
Office of Environmental Quality Control
465 S King Street, Room 104
Honolulu, Hawaii 96813

Dear Dr. Lewin:

Final Environmental Impact Statement
Proposed General Plan
Secondary Resort Area
At Mokuleia

We are notifying you of our acceptance of the above as an adequate fulfillment of Chapter 343, HRS.

Our acceptance is based on the following findings which resulted from our review of the Final Environmental Impact Statement (FEIS).

1. Procedures as set forth in Chapter 200 of Title 11, Environmental Impact Statement Rules for assessment, consultation process, a review responsive to comments, and submission of the statement, have all been completed satisfactorily as follows:

a. An EIS Preparation Notice was published in the Office of Environmental Quality Control (OEQC) Bulletin of October 3, 1986. A list of those parties receiving a copy of the Preparation Notice and all comments received and responses to comments are included in Part XII of the FEIS.

b. The Draft EIS was received by the OEQC on November 20, 1986 and was published in the November 23, 1986 OEQC Bulletin. The deadline for comments was established as December 23, 1986. The distribution list for the Draft EIS and all comments received and responses to comments are included in Part XIII of the FEIS.
c. A request from the applicant for a 30-day extension to the normal 60-day acceptance period dated January 2, 1987 was received and granted by the Department of General Planning (DGP).

d. The FEIS was submitted to DGP for acceptance on January 29, 1987.

2. The content requirements for an EIS as described in Chapter 200 of Title 11, Environmental Impact Statement Rules, have been satisfied in the subject FEIS.

3. Comments submitted during the review process have been satisfactorily responded to and incorporated as part of the FEIS.

We are currently reviewing a Draft EIS submitted on behalf of the Northwestern Mutual Life Insurance Company in connection with a Development Plan amendment proposal for Resort use in the Mokuleia area. While we have found the FEIS which is the subject of this letter to be acceptable in terms of the broad policies expressed in the General Plan, more extensive environmental impact information will be required in connection with the site specific proposals being made in the context of the North Shore Development Plan.

If you have any questions, please contact William Bartlett at 527-6066.

Sincerely,

DONALD A. CLEGG
Chief Planning Officer

Attachment (copy of FEIS)
cc: Mr. Barry R. Okuda
FINAL

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED GENERAL PLAN
SECONDARY RESORT AREA
AT MOKULEIA

NORTH SHORE DISTRICT
OAHU, HAWAII

JANUARY, 1987

BARRY R. OKUDA, INC.
FINAL
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED GENERAL PLAN
SECONDARY RESORT AREA
AT MOKULEIA

JANUARY, 1987

submitted pursuant to chapter 343,
hawaii revised statutes,
environmental impact statement
regulations

Barry R. Okuda
Pauahi Tower 1900
1001 Bishop Street
Honolulu, Hawaii 96813
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PART I
SUMMARY

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<th>Applicant</th>
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<td>Project Name:</td>
<td>Proposed General Plan Secondary Resort Area at Mokuleia</td>
</tr>
<tr>
<td>Project Description:</td>
<td>The applicant has filed for a change to the General Plan that would add the area of Mokuleia as a Secondary Resort Area under Objective B, Policy 6 of the Economic Activity Area of Concern.</td>
</tr>
<tr>
<td>Project Location:</td>
<td>Mokuleia is located on the North Shore of Oahu. For purposes of the General Plan amendment, the area boundaries for the proposed Mokuleia Secondary Resort Area are shown on Exhibit 1.</td>
</tr>
<tr>
<td>Development Plan Designation:</td>
<td>Preservation/Agriculture/Residential/Low and Medium Density Apartment</td>
</tr>
<tr>
<td>State Land Use Designations:</td>
<td>Conservation/Agriculture/Urban</td>
</tr>
<tr>
<td>Zoning:</td>
<td>Preservation/Agriculture/Residential/Apartment</td>
</tr>
<tr>
<td>Applicant:</td>
<td>Northwestern Mutual Life Insurance Company</td>
</tr>
<tr>
<td>Environmental Consultant:</td>
<td>Barry R. Okuda, Inc.</td>
</tr>
<tr>
<td>Accepting Authority:</td>
<td>Department of General Planning</td>
</tr>
</tbody>
</table>
SUMMARY:

Mokuleia is located on the North Shore of Oahu. Mokuleia is not a Census-Designated Place, but Mokuleia residents would constitute the majority of the population for Block Group 9 of Census Tract 99.01, which includes all parts of the Census Tract outside Waialua and Waialua Beach.

Mokuleia is characterized by agricultural, recreational, and residential uses. Wide, white sand beaches and the Waianae Mountain Range border the area. Farrington Highway serves as the main access to Mokuleia.

The applicant is proposing to change the General Plan by adding Mokuleia as a Secondary Resort Area under Objective B, Policy 6 of the General Plan Economic Activity Area of Concern.

The General Plan is a statement of long-range social, economic, environmental and design objectives for the general welfare and prosperity of the people of Oahu. It is not a land use plan for the development of specific parcels of land. Therefore, this General Plan amendment does not involve a site-specific proposal for resort development, nor does it involve a project-specific proposal for resort development. Should the General Plan be amended as proposed, the environmental impacts associated with a site-specific/project-
Specific proposal will be addressed by those wishing to implement a resort development project through an amendment to the North Shore Development Plan.

Although a site-specific/project-specific proposal is not a part of this EIS, the following probable adverse or unavoidable environmental effects and potential mitigating measures associated with this request for a General Plan change to designate Mokuleia as a Secondary Resort Area are summarized below:

<table>
<thead>
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<th>Possible Impacts</th>
<th>Potential Mitigating Measures</th>
</tr>
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<tr>
<td>Potential loss of lands designated Agriculture depending on site-specific location of resort development.</td>
<td>None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. An Agricultural Impact Study may be necessary at such time as a Development Plan application is processed for a site-specific/project-specific resort proposal.</td>
</tr>
<tr>
<td>Potential aircraft noise depending on site-specific location of resort development in relation to Dillingham Airfield.</td>
<td>None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. If necessary, building design techniques and other noise abatement measures are considered available to mitigate</td>
</tr>
<tr>
<td>Construction impacts, including noise, dust and traffic.</td>
<td>None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. However, compliance with State and City regulations will serve as mitigating measures.</td>
</tr>
<tr>
<td>Increased traffic depending on scope and location of a project-specific resort proposal.</td>
<td>None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. A Traffic Impact Study and Air Quality Study will be necessary at such time as a Development Plan amendment is processed for a site-specific/project-specific resort proposal. Also, coordination and compliance with State and City agencies will be necessary.</td>
</tr>
<tr>
<td>Increased water consumption, the amount dependent on the scope of a project-specific resort proposal.</td>
<td>None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. However, the Mokuleia aquifer appears to have sufficient water to accom-</td>
</tr>
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modate a resort proposal. Studies to confirm this will be necessary at such
time as a Development Plan amendment is
processed for a specific resort proposal.

Increased demand for utility services, the extent to which will depend on the details of a specific resort proposal.

None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. Upon the processing of a Development Plan amendment for a specific resort proposal, it will be necessary to determine requirements and coordinate the necessary improvements with the utility companies.

Increased need for public services, police, fire, schools, parks, etc., the extent to which will be determined when a specific resort proposal is processed.

None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. Any resort proposal processed through the Development Plan process will require a Fiscal Impact Analysis, as well as meet City and State requirements for certain facilities and services.
Lifestyle changes, the degree to which will depend on the size and scope of a specific resort proposal. None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. A Social Impact Study will be necessary at such time as a Development Plan amendment is processed for a specific resort project.

Generation of sewage and solid waste, the amount dependent upon the scope of a specific resort proposal. None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. However, because of existing conditions, any resort-specific proposal will require the construction of a Sewage Treatment Plant, either privately built or in participation in the City's proposed Waialua STP project.

Potential loss of archaeological resources/unique vegetation/or wildlife habitat depending on location and type of activity in relation to such resources. None necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. An Archaeological Study, as well as a Flora/Fauna Study, will be necessary at such time as a Development Plan amendment is processed for a specific resort project.
The applicant has considered a number of alternatives to the proposed action including (1) No Action, (2) Selection of alternate locations for Secondary Resort Areas, and (3) Expansion of existing resort areas.

Unresolved Issues:

None. The proposed action is a change to a policy statement in the General Plan which is not site-specific nor project-specific.

Compatibility With Land Use Plan/List of Permits and Approvals:

The proposed action is not a change to any land use plans. The proposed action to designate Hokuleia as a Secondary Resort Area is a change to the City and County of Honolulu's General Plan which is a statement of long-range goals and objectives of the City. This change is consistent with the Hawaii State Plan and conforms to the General Plan amendment Procedures and Rules of the Department of General Planning. Approving authority for the General Plan amendment is the City Council of the City and County of Honolulu.
PART II
INTRODUCTION

A. GENERAL DESCRIPTION OF THE MOKULEIA AREA

Mokuleia is located on the North Shore of Oahu. For the purpose of
the proposed General Plan amendment, the area of Mokuleia is shown on
Exhibit 1, and described as follows:

Starting from the ocean and extending to the 400 foot contour
along Kamananui, Mokuleia boundary and along the 400 foot
contour in a westerly direction to a line which is perpen-
dicular to Farrington Highway, adjoining the entrance to
Dillingham Airfield, and extending to the ocean.

Mokuleia is a rural area with pockets of houses and apartments and
large acreages devoted to agriculture, mostly in sugar production.
Recreational uses, including a polo field, the City and County of
Honolulu's Mokuleia Beach Park, the Mokuleia Army Beach, and the
Episcopal Church's Camp Mokuleia, are located makai of Farrington
Highway. Mauka of Farrington Highway is Dillingham Airfield.

The communities of Waialua and Haleiwa are east of the Mokuleia area.

B. HISTORY OF THE MOKULEIA AREA

Mokuleia as a rural residential area began to develop along the
coastline in the early to mid-60's. In the 1970's portions of the
coastline were developed for apartments, which today remain as the only apartment-designated area along the entire North Shore area. Prior to these times, the area remained undeveloped or farmed for a variety of agricultural pursuits. A railroad was built in the early 1900's to link the area with Honolulu for the main purpose of transporting agriculture crops. In the 1940's, the military built what is known today as the Dillingham Airfield.

C. CURRENT LAND USE CLASSIFICATIONS AND ZONING

State Land Use Classification is shown on Exhibit 2.

Development Plan Land Use Designations are shown on Exhibit 3.

Development Plan Public Facilities Designations are shown on Exhibit 4.

LUD Zoning Districts are shown on Exhibit 5.

Special Management Area Boundaries are shown on Exhibit 6.

Flood Hazard Classifications are shown on Exhibit 7.

ALISH (Agricultural Lands of Importance) are shown on Exhibit 8.

Land Study Bureau Classifications (A&B) are shown on Exhibit 9.
**Legend:**

For

**Exhibit 4. Development Plan Public Facilities:**

<table>
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<th>Proposed Funding (within 6 years)</th>
<th>Planned for Future (7 years and beyond)</th>
</tr>
</thead>
</table>

**Transportation Systems**

- Additional Right of Way and New Streets
- Improvements within Existing Right of Way

**Public Facility**

- Site Determined (by property line)
- Site Undetermined (in general area)

- P - Park
- STP - Sewage Treatment Plant
- Well - Water Well
LEGEND:

FOR

EXHIBIT 7, FLOOD HAZARD CLASSIFICATIONS:

KEY TO MAP

500-Year Flood Boundary
100-Year Flood Boundary
Zone Designations* With Date of Identification e.g., 12/5/74
500-Year Flood Boundary

Base Flood Elevation Line With Elevation in Feet**

Base Flood Elevation In Feet (EL 987)
Where Uniform Within Zone**
Elevation Reference Mark RM7
River Mile * M1.5

**Referenced to the National Geodetic Vertical Datum of 1929

*EXPLANATION OF ZONE DESIGNATIONS

ZONE EXPLANATION

A Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
AO Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors are determined.
AH Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.
A1-A20 Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A29 Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.
B Areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood, (Medium shading)
C Areas of minimal flooding. (No shading)
D Areas of undetermined, but possible, flood hazards.
V Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V1-V20 Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

NOTES TO USER

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.
This map is for flood insurance purposes only; it does not necessarily show all areas subject to flooding in the community or all planimetric features outside special flood hazard areas.

FLOOD INSURANCE RATE MAP EFFECTIVE:

SEPTEMBER 2, 1980
### Legend:

**FOR EXHIBIT 10, SOIL CLASSIFICATIONS:**

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<th>Code</th>
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<td>Beaches</td>
</tr>
<tr>
<td>CR</td>
<td>Coral Outcrop</td>
</tr>
<tr>
<td>EaC</td>
<td>Ewa Silty Clay Loam, 6 to 12 percent slopes</td>
</tr>
<tr>
<td>EwC</td>
<td>Ewa Stony Silty Clay, 6 to 12 percent slopes</td>
</tr>
<tr>
<td>Fd</td>
<td>Fill Land</td>
</tr>
<tr>
<td>FL</td>
<td>Fill Land, Mixed</td>
</tr>
<tr>
<td>HeA</td>
<td>Haleiwa Silty Clay, 0 to 2 percent slopes</td>
</tr>
<tr>
<td>HJE</td>
<td>Halawa Silt Loam, 20 to 35 percent slopes</td>
</tr>
<tr>
<td>HLMG</td>
<td>Helemano Silty Clay, 30 to 90 percent slopes</td>
</tr>
<tr>
<td>JaC</td>
<td>Jauca Sand, 0 to 15 percent slopes</td>
</tr>
<tr>
<td>KbB</td>
<td>Kaena Clay, 2 to 6 percent slopes</td>
</tr>
<tr>
<td>KaeB</td>
<td>Kaena Stony Clay, 2 to 6 percent slopes</td>
</tr>
<tr>
<td>KaeC</td>
<td>Kaena Stony Clay, 6 to 12 percent slopes</td>
</tr>
<tr>
<td>KanE</td>
<td>Kaena Very Stony Clay, 10 to 35 percent slopes</td>
</tr>
<tr>
<td>KLa</td>
<td>Kawaihapai Clay Loam, 0 to 2 percent slopes</td>
</tr>
<tr>
<td>KlaA</td>
<td>Kawaihapai Stony Clay Loam, 0 to 2 percent slopes</td>
</tr>
<tr>
<td>KlaB</td>
<td>Kawaihapai Stony Clay Loam, 2 to 6 percent slopes</td>
</tr>
<tr>
<td>KlbC</td>
<td>Kawaihapai Very Stony Clay Loam, 0 to 15 percent slopes</td>
</tr>
<tr>
<td>KmA</td>
<td>Keaau Clay, 0 to 2 percent slopes</td>
</tr>
<tr>
<td>KpD</td>
<td>Kemoo Silty Clay, 12 to 20 percent slopes</td>
</tr>
<tr>
<td>KpE</td>
<td>Kemoo Silty Clay, 20 to 35 percent slopes</td>
</tr>
<tr>
<td>KpF</td>
<td>Kemoo Silty Clay, 35 to 70 percent slopes</td>
</tr>
<tr>
<td>LuA</td>
<td>Lualualei Clay, 0 to 2 percent slopes</td>
</tr>
<tr>
<td>Mt</td>
<td>Mokuleia Clay Loam</td>
</tr>
<tr>
<td>Ph</td>
<td>Pearl Harbor Clay</td>
</tr>
<tr>
<td>PsA</td>
<td>Pulehu Clay Loam, 0 to 3 percent slopes</td>
</tr>
<tr>
<td>PuB</td>
<td>Pulehu Stony Clay Loam, 2 to 6 percent slopes</td>
</tr>
<tr>
<td>TP</td>
<td>Tropaquepts</td>
</tr>
<tr>
<td>WKA</td>
<td>Waialua Silty Clay, 0 to 3 percent slopes</td>
</tr>
<tr>
<td>WLB</td>
<td>Waialua Stony Silty Clay, 3 to 8 percent slopes</td>
</tr>
<tr>
<td>rRk</td>
<td>Rock Land</td>
</tr>
<tr>
<td>rSY</td>
<td>Stony Steep Land</td>
</tr>
<tr>
<td>rTP</td>
<td>Tropohumults-Dystrandepts Association</td>
</tr>
</tbody>
</table>
CORRECTION

THE PRECEDING DOCUMENT(S) HAS BEEN REPHOTOGRAPHED TO ASSURE LEGIBILITY. SEE FRAME(S) IMMEDIATELY FOLLOWING.
**LEGEND:** FOR

**EXHIBIT 11, LESA PROPOSED L. E. CLASSIFICATIONS:**

<table>
<thead>
<tr>
<th>MAP SYMBOL</th>
<th>L. E. RATING</th>
</tr>
</thead>
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</tr>
<tr>
<td>CR</td>
<td>No Rating</td>
</tr>
<tr>
<td>EaC</td>
<td>83</td>
</tr>
<tr>
<td>EwC</td>
<td>77</td>
</tr>
<tr>
<td>Fd</td>
<td>65</td>
</tr>
<tr>
<td>FL</td>
<td>18</td>
</tr>
<tr>
<td>HeA</td>
<td>84</td>
</tr>
<tr>
<td>HJE</td>
<td>45</td>
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<tr>
<td>HLMG</td>
<td>No Rating</td>
</tr>
<tr>
<td>JaC</td>
<td>41</td>
</tr>
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<td>KαB</td>
<td>79</td>
</tr>
<tr>
<td>KaeB</td>
<td>71</td>
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<tr>
<td>KaeC</td>
<td>62</td>
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<tr>
<td>KanE</td>
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<tr>
<td>KLA</td>
<td>94</td>
</tr>
<tr>
<td>KlAa</td>
<td>83</td>
</tr>
<tr>
<td>KlAB</td>
<td>83</td>
</tr>
<tr>
<td>KlbC</td>
<td>46</td>
</tr>
<tr>
<td>KmA</td>
<td>45</td>
</tr>
<tr>
<td>KpD</td>
<td>69</td>
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<td>KpE</td>
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<td>KpF</td>
<td>23</td>
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<tr>
<td>LuA</td>
<td>73</td>
</tr>
<tr>
<td>Mt</td>
<td>76</td>
</tr>
<tr>
<td>Ph</td>
<td>43</td>
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<tr>
<td>Psa</td>
<td>86</td>
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<td>PuB</td>
<td>82</td>
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<td>No Rating</td>
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<tr>
<td>rSY</td>
<td>No Rating</td>
</tr>
<tr>
<td>rTP</td>
<td>No Rating</td>
</tr>
</tbody>
</table>
Soil Classifications are shown on Exhibit 10.

LESAs (LE) Proposed Classifications are shown on Exhibit 11.

LESAs Proposed Illustrative Generalized IAL designations are shown on Exhibit 12.

D. OBJECTIVES

1. Market Assessment

Summary and Conclusions

There are presently about 38,600 visitor rooms available on Oahu. According to projections by John Child and Company, between 18,900 and 22,700 additional visitor units are needed by the year 2005 (based on assumed occupancy rates of 75% and 80%). Between 9,300 to 9,400 new visitor units are currently planned in seven (7) major developments on Oahu. This figure includes the full development of the Secondary Resort Areas already identified in the General Plan, according to the unit limit specified in the Development Plans (see table below under D.2.). Assuming successful completion of these units, there will still be a need for about 9,500 to 13,300 new units by the year 2005.
State of Hawaii Visitor Trends

Visitors are one of the two largest sources of income and employment for Hawaii. For statistical purposes, the Hawaii Visitors Bureau (HVB) separates overnight visitors to the State in terms of travel direction. Westbound visitors include those arriving from North America while eastbound visitors include those from Asia (primarily Japan) and the Pacific. Recent trends in the visitor industry in the State and neighbor islands of Hawaii are reviewed below.

Historical Visitor Arrivals

In 1985 visitor arrivals to the State totalled nearly 4.9 million, only 0.3% above total arrivals in 1984. Growth in visitor arrivals to the State has declined during the past 25 years, as shown in Table 1. This downward trend in growth is due primarily to the increasing visitor base and the maturing of the State as a visitor destination.

Westbound visitors continue to represent the majority of the arrivals to the State, averaging between 75% and 85% to total arrivals during the past 10 years, as shown in Table 2.
<table>
<thead>
<tr>
<th>Year</th>
<th>Westbound</th>
<th>Eastbound</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent increase since previous year</td>
<td>Number</td>
</tr>
<tr>
<td>1965</td>
<td>567,218</td>
<td>17.7</td>
<td>119,710</td>
</tr>
<tr>
<td>1970</td>
<td>1,326,135</td>
<td>18.5</td>
<td>420,835</td>
</tr>
<tr>
<td>1975</td>
<td>2,207,417</td>
<td>12.1</td>
<td>621,688</td>
</tr>
<tr>
<td>1980</td>
<td>3,046,132</td>
<td>(3.0)</td>
<td>888,372</td>
</tr>
<tr>
<td>1981</td>
<td>2,974,791</td>
<td>(2.3)</td>
<td>959,832</td>
</tr>
<tr>
<td>1982</td>
<td>3,278,519</td>
<td>10.2</td>
<td>964,397</td>
</tr>
<tr>
<td>1983</td>
<td>3,395,880</td>
<td>3.6</td>
<td>972,000</td>
</tr>
<tr>
<td>1984</td>
<td>3,721,380</td>
<td>9.6</td>
<td>1,134,200</td>
</tr>
<tr>
<td>1985</td>
<td>3,699,140</td>
<td>(0.6)</td>
<td>1,170,990</td>
</tr>
</tbody>
</table>

**Compound annual percentage increase:**
- 1960 to 1970: 18.1
- 1970 to 1980: 7.8
- 1980 to 1985: 4.0

**Total:**
- 1960 to 1970: 24.9
- 1970 to 1980: 8.5
- 1980 to 1985: 4.4

---

1/ Visitor statistics collection system revised in 1964.
2/ Not significant.

Source: Hawaii Visitors Bureau, annual and monthly reports; and First Hawaiian Bank Research Department, Economic Indicators, January/February 1986.
Growth in westbound visitor arrivals has declined from an average rate of 18.1% per year between 1960 and 1970, to 8.7% per year between 1970 and 1980, and to 4.0% between 1980 and 1985. The smaller eastbound segment of visitor arrivals has grown faster than westbound arrivals, with average annual increases of 24.9% between 1960 and 1970, 7.8% between 1970 and 1980, and 5.7% between 1980 and 1985.

In 1985 visitor arrivals were severely curtailed by the 29-day long United Airlines strike in May and June. Losses in westbound arrivals were partially offset by healthy growth in eastbound visitor arrivals, resulting in total year-end visitor arrivals nearly identical to 1984 levels.

Oahu Visitor Arrivals

In 1985 Oahu attracted about 76% of all westbound visitors, as shown in Table 3. However, this is down from 1970, when Oahu captured 94% of the westbound visitor market.

Oahu is expected to continue to be the most visited island; however, an increasing share of the State's guests could be expected to also visit the neighbor islands or forego Oahu entirely. This trend could be slowed with the development of major destination resorts on Oahu that offer both first-time and repeat visitors an alternative to staying in hotels in Waikiki.
TABLE 2

MOKULEIA
Westbound Visitor Arrivals to Oahu
1970 to 1985

<table>
<thead>
<tr>
<th>Year</th>
<th>Total visitors</th>
<th>Percent of State westbound total</th>
<th>Percent increase (decrease) since previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1970</td>
<td>1,246,970</td>
<td>94.0%</td>
<td>-%</td>
</tr>
<tr>
<td>1975</td>
<td>1,889,790</td>
<td>85.6</td>
<td>8.7</td>
</tr>
<tr>
<td>1980</td>
<td>2,398,740</td>
<td>78.7</td>
<td>(5.7)</td>
</tr>
<tr>
<td>1981</td>
<td>2,398,480</td>
<td>80.6</td>
<td>-</td>
</tr>
<tr>
<td>1982</td>
<td>2,589,190</td>
<td>79.0</td>
<td>8.0</td>
</tr>
<tr>
<td>1983</td>
<td>2,591,635</td>
<td>76.3</td>
<td>1.1</td>
</tr>
<tr>
<td>1984</td>
<td>2,901,320</td>
<td>78.0</td>
<td>11.9</td>
</tr>
<tr>
<td>1985</td>
<td>2,818,950</td>
<td>76.2</td>
<td>(2.8)</td>
</tr>
</tbody>
</table>

Compound annual percentage increase - 1970 to 1985 5.6

Source: Figures represent all overnight and longer westbound visitors to and beyond Hawaii as reported by the Hawaii Visitors Bureau, Annual Research Report, annual; and First Hawaiian Bank, Economic Indicators, January/February 1986.
Neighbor Island Visitor Arrivals

Westbound visitor arrivals have grown at a faster rate on the neighbor islands than on Oahu. Since 1970, the neighbor islands have had an average growth rate of 6.5% per year, compared to 5.6% per year on Oahu, as shown in Table 3. Increased travel to the neighbor islands result from:

- Greater development of integrated resort destinations on the neighbor islands.
- Increasing numbers of repeat visitors to the State seeking new vacation experiences.
- Increased air service including direct flights from major mainland cities to the neighbor islands.
- Decline in new visitor facilities and the aging of existing facilities on Oahu.

On the islands of Maui, Kauai and Hawaii, major destination resorts have been developed with hotel, condominium and single-family accommodations, golf courses, tennis facilities and other master-planned amenities. In addition, outer island resorts offer repeat visitors new destinations in Hawaii with different visitor attractions and a resort life style.
### TABLE 3

**MOKULEIA**

Westbound Visitors to the Neighbor Islands

1970 to 1985

<table>
<thead>
<tr>
<th>Year</th>
<th>Neighbor Islands</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Oahu</td>
<td>Hawaii</td>
<td>Maui</td>
<td>Kauai</td>
<td>Total</td>
</tr>
<tr>
<td>1970</td>
<td>1,246,970</td>
<td>445,401</td>
<td>447,985</td>
<td>410,075</td>
<td>1,326,135</td>
</tr>
<tr>
<td>1975</td>
<td>1,889,790</td>
<td>769,779</td>
<td>931,863</td>
<td>632,821</td>
<td>2,207,417</td>
</tr>
<tr>
<td>1980</td>
<td>2,398,740</td>
<td>761,103</td>
<td>1,378,189</td>
<td>781,409</td>
<td>3,046,332</td>
</tr>
<tr>
<td>1981</td>
<td>2,398,480</td>
<td>672,683</td>
<td>1,389,892</td>
<td>757,811</td>
<td>2,974,781</td>
</tr>
<tr>
<td>1982</td>
<td>2,589,190</td>
<td>678,170</td>
<td>1,550,080</td>
<td>733,295</td>
<td>3,278,554</td>
</tr>
<tr>
<td>1983</td>
<td>2,591,635</td>
<td>712,380</td>
<td>1,644,605</td>
<td>691,940</td>
<td>3,395,880</td>
</tr>
<tr>
<td>1984</td>
<td>2,901,320</td>
<td>756,890</td>
<td>1,849,800</td>
<td>806,620</td>
<td>3,721,380</td>
</tr>
<tr>
<td>1985</td>
<td>2,818,950</td>
<td>695,340</td>
<td>1,826,980</td>
<td>830,380</td>
<td>3,699,140</td>
</tr>
</tbody>
</table>

**Compound annual percentage increase -**

1970 to 1985  
3.3%  3.0%  9.8%  4.8%  4.2%

**Source:** Includes westbound visitors to and beyond Hawaii, as reported by the Hawaii Visitors Bureau, *Annual Research Reports*, annual; Hawaii Visitors Bureau, *Research Report*, December 1985; and First Hawaiian Bank Research Department, *Economic Indicators*, January/February 1986.
The neighbor islands have been able to capture an increasingly larger share of total visitor arrivals because they have demonstrated their responsiveness to the growing needs of the visitor for newer vacation experiences. With Oahu's existing visitor plant aging and the neighbor island resorts growing in prominence and recognition, the neighbor islands are anticipated to continue to capture a growing share of total visitor arrivals.

Visitor Characteristics

Most westbound visitors travel to Hawaii for vacations. In 1984, over 90% of the westbound travel to the State was for pleasure or business and pleasure, as shown in Table 4.

Westbound visitors have typically traveled to Hawaii independently. Independent travellers averaged about 75% of total visitors since 1970, also shown in the Table.

Hotels continue to serve the majority of visitors for accommodations. Since 1975, condominium units have been growing in popularity as an alternative, increasing from less than 1% in 1975 to nearly 20% in 1984.

The average length of stay in the State has remained relatively stable over the last ten years at approximately ten days. By island, length of stay is longest on Oahu at 7.5 days and shortest
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<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>Pleasure</td>
<td>74.6%</td>
<td>76.4%</td>
<td>75.4%</td>
<td>79.7%</td>
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<tr>
<td>Business</td>
<td>3.8%</td>
<td>2.6%</td>
<td>2.9%</td>
<td>2.3%</td>
</tr>
<tr>
<td>Business and pleasure</td>
<td>9.9%</td>
<td>10.7%</td>
<td>13.3%</td>
<td>11.5%</td>
</tr>
<tr>
<td>Military and government</td>
<td>0.6%</td>
<td>0.3%</td>
<td>0.4%</td>
<td>0.5%</td>
</tr>
<tr>
<td>Relatives</td>
<td>6.3%</td>
<td>3.7%</td>
<td>4.1%</td>
<td>2.9%</td>
</tr>
<tr>
<td>Convention</td>
<td>4.5%</td>
<td>6.2%</td>
<td>3.5%</td>
<td>2.7%</td>
</tr>
<tr>
<td>Other</td>
<td>0.3%</td>
<td>0.1%</td>
<td>0.4%</td>
<td>0.4%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Group</td>
<td>21.9%</td>
<td>45.1%</td>
<td>23.9%</td>
<td>18.8%</td>
</tr>
<tr>
<td>Individual basis</td>
<td>77.5%</td>
<td>54.6%</td>
<td>72.0%</td>
<td>75.0%</td>
</tr>
<tr>
<td>Incentive</td>
<td>-</td>
<td>-</td>
<td>3.7%</td>
<td>5.7%</td>
</tr>
<tr>
<td>Government - military</td>
<td>0.6%</td>
<td>0.3%</td>
<td>0.4%</td>
<td>0.5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Accommodations used:</th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotel or apartment hotel</td>
<td>84.2%</td>
<td>91.7%</td>
<td>71.2%</td>
<td>69.1%</td>
</tr>
<tr>
<td>Rented home or apartment condominium</td>
<td>0.8%</td>
<td>0.5%</td>
<td>16.4%</td>
<td>19.6%</td>
</tr>
<tr>
<td>Friends or relatives</td>
<td>12.6%</td>
<td>6.8%</td>
<td>10.6%</td>
<td>8.0%</td>
</tr>
<tr>
<td>Others</td>
<td>2.4%</td>
<td>1.0%</td>
<td>1.8%</td>
<td>3.3%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

| Average stay in State (days)          | 10.3  | 10.5  | 10.6  | 10.3  |
| Persons per party                     | 1.55  | 1.74  | 1.79  | 1.84  |

---

1/ Represents percentage of westbound visitors to and beyond Hawaii.

Source: Hawaii Visitors Bureau, Annual Research Reports, annual.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 20</td>
<td>11.6%</td>
<td>9.2%</td>
<td>10.5%</td>
<td>10.9%</td>
</tr>
<tr>
<td>20 - 29</td>
<td>22.9%</td>
<td>16.2%</td>
<td>17.6%</td>
<td>18.1%</td>
</tr>
<tr>
<td>30 - 49</td>
<td>34.0%</td>
<td>36.0%</td>
<td>38.0%</td>
<td>39.4%</td>
</tr>
<tr>
<td>50 - 59</td>
<td>18.9%</td>
<td>22.8%</td>
<td>19.4%</td>
<td>15.9%</td>
</tr>
<tr>
<td>60 and older</td>
<td>12.6%</td>
<td>15.8%</td>
<td>14.5%</td>
<td>15.7%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

| Median age           | 40.7  | 44.5  | 41.3  | 40.1  |

<table>
<thead>
<tr>
<th>Occupation:</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Professional and technical</td>
<td>27.9%</td>
<td>33.5%</td>
<td>35.8%</td>
<td>36.3%</td>
</tr>
<tr>
<td>Business, managerial</td>
<td>21.6%</td>
<td>26.9%</td>
<td>26.2%</td>
<td>25.2%</td>
</tr>
<tr>
<td>and official</td>
<td>12.2%</td>
<td>11.2%</td>
<td>9.7%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Clerical, office and sales</td>
<td>13.7%</td>
<td>9.0%</td>
<td>1.0%</td>
<td>1.3%</td>
</tr>
<tr>
<td>Military and dependents</td>
<td>7.2%</td>
<td>8.0%</td>
<td>7.6%</td>
<td>7.0%</td>
</tr>
<tr>
<td>Other employed</td>
<td>7.6%</td>
<td>12.5%</td>
<td>11.5%</td>
<td>13.6%</td>
</tr>
<tr>
<td>Retired</td>
<td>9.8%</td>
<td>7.0%</td>
<td>8.2%</td>
<td>7.0%</td>
</tr>
<tr>
<td>Students and unemployed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trips to Hawaii:</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First</td>
<td>67.2%</td>
<td>60.3%</td>
<td>51.6%</td>
<td>52.7%</td>
</tr>
<tr>
<td>Second</td>
<td>14.7%</td>
<td>17.1%</td>
<td>18.8%</td>
<td>18.6%</td>
</tr>
<tr>
<td>Third</td>
<td>5.6%</td>
<td>7.2%</td>
<td>9.1%</td>
<td>8.6%</td>
</tr>
<tr>
<td>Fourth</td>
<td>12.5%</td>
<td>15.4%</td>
<td>20.5%</td>
<td>20.1%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Repeat visitors</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>United States</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>California</td>
<td>33.4%</td>
<td>24.8%</td>
<td>30.6%</td>
<td>27.2%</td>
</tr>
<tr>
<td>Other Pacific Coast</td>
<td>8.6%</td>
<td>9.7%</td>
<td>10.1%</td>
<td>8.0%</td>
</tr>
<tr>
<td>Mountain</td>
<td>5.7%</td>
<td>5.2%</td>
<td>6.4%</td>
<td>6.7%</td>
</tr>
<tr>
<td>Central</td>
<td>26.7%</td>
<td>29.2%</td>
<td>23.4%</td>
<td>28.4%</td>
</tr>
<tr>
<td>Atlantic</td>
<td>20.0%</td>
<td>19.0%</td>
<td>16.9%</td>
<td>19.7%</td>
</tr>
<tr>
<td>Canada</td>
<td>94.4%</td>
<td>87.9%</td>
<td>87.4%</td>
<td>90.0%</td>
</tr>
<tr>
<td>Other foreign</td>
<td>5.0%</td>
<td>11.0%</td>
<td>11.0%</td>
<td>8.4%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: Hawaii Visitors Bureau, Annual Research Reports, annual.
on the Island of Hawaii at 3.6 days. Maui has shown the greatest
nominal growth in length of stay, increasing by 3.5 days from 1970
to 1984. It currently averages 6.5 days.

Average persons per party has slowly increased from 1.74 persons
in 1975 to 1.84 persons in 1984. This increase may be attribu-
table to more family groups and easier access to the State from
mainland destinations.

Visitors aged 30 to 49 were by far the largest age group to visit
Hawaii, representing nearly 40% of all westbound arrivals in 1984
as shown in Table 5. Next largest is the 20 to 29 age group which
accounted for approximately 18% in 1984.

Persons in professional and technical occupations were the largest
employment segment to visit the State in 1984. This group repre-
sented about 36% of visitors. They were followed by visitors in
business, managerial and official occupations, 25.2%.

About half of Hawaii's visitors are first-time visitors to the
State, as also shown in the Table. Repeat visitors have increased
from only 33% in 1970 to 47% in 1984.

Westbound visitors to the State typically reside in the continen-
tal United States. The largest segment is residents of the West
Coast States and Alaska, representing 35% of all westbound
visitors. Foreign visitors were primarily Japanese and Canadian citizens. During recent years, foreign visitor arrivals have declined due to the relatively stronger U.S. dollar.

Visitor Market Segments

Visitors may be distinguished by their travel status. The five major segments of Hawaii’s visitor market are described as follows:

- **Free independent travelers** - Free independent travelers (FITs) travel individually rather than with a group. FITs typically have higher-than-average incomes and patronize the higher-priced visitor accommodations. These travelers are often repeat visitors who are familiar with the State.

- **Group tour travelers** - The group traveler market includes tours and convention-oriented visitor packages. In contrast to FITs, the group travelers, also known as group inclusive travelers (GIT), have declined as a percent of westbound visitors over the last decade.

- **Convention attendees** - The convention market consists of groups meeting in Hawaii for meetings or conventions. The convention market is quite irregular, as a large meeting can distort figures for a given year.
• Incentive travelers - The incentive group market represent a small but sought-after market segment. It consists of management personnel and executives who are given expense paid trips as bonuses or incentives. This group usually has high income, a higher propensity to return as visitors, spends more money and frequents more expensive restaurants and hotel accommodations.

• Government and military visitors - This group typically represents less than 1% of overnight visitors to the islands and are not considered in further detail.

In summary, FITs account for the largest market segment, representing over 73% of westbound visitors, as shown in Table 6. The fastest rates of growth were experienced by incentive groups at 18.4% and FITs at 8%. In contrast, convention travelers have remained relatively stable, while group and other travelers have declined by 1.1% and 11%, respectively, as also shown in the table.

Visitor Expenditures

Visitor expenditures in the State totalled over $4.5 billion in 1984 and have shown double-digit increases every year since 1970, except for 1983, as shown in Table 7. Expenditures per visitor have also increased but at a slower rate than total visitor expenditures.
### TABLE 6
**Mokuleia**
Hawaii Visitor Market Segments
1978 to 1984

<table>
<thead>
<tr>
<th>Year</th>
<th>FIT</th>
<th>Group</th>
<th>Convention</th>
<th>Incentive group</th>
<th>Government military/other</th>
<th>Total westbound visitors to Hawaii 2/</th>
</tr>
</thead>
<tbody>
<tr>
<td>1978</td>
<td>1,563,746</td>
<td>738,897</td>
<td>230,273</td>
<td>68,750</td>
<td>97,165</td>
<td>2,698,831</td>
</tr>
<tr>
<td>1980</td>
<td>1,934,393</td>
<td>410,646</td>
<td>230,891</td>
<td>100,367</td>
<td>42,566</td>
<td>2,718,863</td>
</tr>
<tr>
<td>1981</td>
<td>1,914,140</td>
<td>412,370</td>
<td>181,662</td>
<td>90,972</td>
<td>11,998</td>
<td>2,611,142</td>
</tr>
<tr>
<td>1982</td>
<td>2,163,210</td>
<td>396,797</td>
<td>167,558</td>
<td>126,615</td>
<td>42,075</td>
<td>2,896,255</td>
</tr>
<tr>
<td>1984</td>
<td>2,482,360</td>
<td>367,388</td>
<td>255,152</td>
<td>189,800</td>
<td>91,180</td>
<td>3,385,880</td>
</tr>
</tbody>
</table>

Compounded annual percentage increase (decrease)  
8.0% (11.0) 1.7% 18.4% (1.1) 3.9%

---

1/ Includes nonrespondents.
2/ Includes all westbound visitors to Hawaii (exclusive of visitors traveling beyond Hawaii).

### TABLE 7
MOKULEIA
Visitor Expenditures in Hawaii
1970 to 1984

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Amount (billions)</th>
<th>Annual Increase</th>
<th>Per Visitor Amount</th>
<th>Annual Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>1970</td>
<td>$0.595</td>
<td>-%</td>
<td>$341</td>
<td>-%</td>
</tr>
<tr>
<td>1975</td>
<td>1.360</td>
<td>18.0</td>
<td>481</td>
<td>7.1</td>
</tr>
<tr>
<td>1980</td>
<td>2.875</td>
<td>16.2</td>
<td>731</td>
<td>14.0</td>
</tr>
<tr>
<td>1981</td>
<td>3.200</td>
<td>11.3</td>
<td>813</td>
<td>11.2</td>
</tr>
<tr>
<td>1982</td>
<td>3.700</td>
<td>15.6</td>
<td>872</td>
<td>7.3</td>
</tr>
<tr>
<td>1983</td>
<td>3.974</td>
<td>7.4</td>
<td>910</td>
<td>4.4</td>
</tr>
<tr>
<td>1984</td>
<td>4.582</td>
<td>15.3</td>
<td>943</td>
<td>3.6</td>
</tr>
</tbody>
</table>

Westbound and eastbound visitor spending patterns vary significantly. Visitor expenditure surveys conducted by HVB indicate that Japanese visitors spend significantly more per day than do all other visitors. In 1983, the average daily expenditure for Japanese visitors was $227, about 160% more than the $86 spent by all other visitors.

Spending patterns are influenced by the relatively shorter average length of stay of eastbound visitors (in 1983, 4.9 days compared to 10.3 days for westbound visitors). Also those who visit Oahu only tend to spend less than visitors to the State as a whole. According to statistics provided by the HVB, the relatively greater expenditures made by neighbor island visitors are due to expenditures for lodging, ground transportation, and tours.

Projected Visitor Arrivals

State of Hawaii

Hawaii's position in the world market has been enhanced in recent years because of the:

- Growing number of alternative visitor destinations in the State which appeal to a wide variety of visitors.
- Lower airfares making travel to Hawaii more affordable.
• Increased advertising and publicity effort by hotels, resorts, and visitor associations to promote the vacation experience in Hawaii.

• International conflicts and tension which have made travel to Europe and the Mediterranean less attractive than in the past.

• Deregulation of Japanese overseas air service which increased competition among Japanese air carriers for air service between Japan, Hawaii, and the mainland United States.

Westbound and eastbound visitor arrivals to the State of Hawaii over the next 20 years are based on projections by the Department of Planning and Economic Development (DPED), prepared in July 1984. Based on these projections, westbound and eastbound visitor arrivals to the State are expected to increase at a slower than historical rate of growth. This slower rate is based on the relative maturity of Hawaii as a visitor destination, as reflected by the declining rates of growth of visitor arrivals between 1960 and 1985, as previously shown in Table 1. According to DPED, total visitor arrivals to the State are projected at 6.1 million by 1990, 7.1 million by 1995, 7.8 million by 2000, and 8.2 million by 2005, as shown in Table 8. This represents an average growth rate of about 2.5% compounded annually over the next 20 years.
TABLE 8
MOKULEIA
Historical and Projected Visitor Arrivals to the State and Oahu
1980 to 2005

<table>
<thead>
<tr>
<th>Year</th>
<th>Westbound State</th>
<th>Westbound Percent of State</th>
<th>Westbound Oahu</th>
<th>Eastbound State</th>
<th>Eastbound Percent of State</th>
<th>Eastbound Oahu</th>
<th>Total Visitors State</th>
<th>Total Visitors Oahu</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historical:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1980</td>
<td>3,066,132</td>
<td>78.7%</td>
<td>2,398,740</td>
<td>888,372</td>
<td>99.6%</td>
<td>1/</td>
<td>884,819</td>
<td>3,934,504</td>
</tr>
<tr>
<td>1981</td>
<td>2,974,791</td>
<td>80.6%</td>
<td>2,398,480</td>
<td>959,832</td>
<td>99.7%</td>
<td>1/</td>
<td>956,953</td>
<td>3,934,623</td>
</tr>
<tr>
<td>1982</td>
<td>3,278,519</td>
<td>79.0%</td>
<td>2,589,190</td>
<td>964,397</td>
<td>99.6%</td>
<td>1/</td>
<td>960,539</td>
<td>4,242,916</td>
</tr>
<tr>
<td>1983</td>
<td>3,395,880</td>
<td>76.3%</td>
<td>2,591,635</td>
<td>972,000</td>
<td>99.5%</td>
<td>1/</td>
<td>967,140</td>
<td>4,367,880</td>
</tr>
<tr>
<td>1984</td>
<td>3,721,380</td>
<td>78.0%</td>
<td>2,901,320</td>
<td>1,134,200</td>
<td>99.5%</td>
<td>1/</td>
<td>1,128,529</td>
<td>4,855,580</td>
</tr>
<tr>
<td>1985</td>
<td>3,699,140</td>
<td>76.2%</td>
<td>2,818,950</td>
<td>1,170,990</td>
<td>99.0%</td>
<td>1/</td>
<td>1,159,300</td>
<td>4,870,130</td>
</tr>
<tr>
<td>Projected:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1990</td>
<td>4,461,000</td>
<td>75.0%</td>
<td>3,345,800</td>
<td>1,622,300</td>
<td>97.0%</td>
<td>1/</td>
<td>1,573,600</td>
<td>6,083,300</td>
</tr>
<tr>
<td>1995</td>
<td>5,171,700</td>
<td>73.0%</td>
<td>3,775,300</td>
<td>1,880,500</td>
<td>94.0%</td>
<td>1/</td>
<td>1,767,700</td>
<td>7,052,200</td>
</tr>
<tr>
<td>2000</td>
<td>5,709,900</td>
<td>71.0%</td>
<td>4,054,000</td>
<td>2,076,300</td>
<td>92.0%</td>
<td>1/</td>
<td>1,910,200</td>
<td>7,786,200</td>
</tr>
<tr>
<td>2005</td>
<td>6,001,100</td>
<td>70.0%</td>
<td>4,200,800</td>
<td>2,182,300</td>
<td>90.0%</td>
<td>1/</td>
<td>1,964,100</td>
<td>8,183,400</td>
</tr>
</tbody>
</table>

Compound annual percentage increase -
1980 to 1985 4.0% 3.3% 5.7% 5.6% 4.4% 3.9%
1985 to 2005 2.4% 2.0% 3.2% 2.7% 2.6% 2.2%

1/ Estimated based on surveys of Japanese visitors to Oahu as reported by the Hawaii Visitors Bureau, Annual Research Report, 1980 and 1983.
2/ Based on the rate of increase of non-Japanese visitors as projected by the Department of Planning and Economic Development, State of Hawaii.
3/ Based on the rate of increase of Japanese visitors as projected by the Department of Planning and Economic Development, State of Hawaii, and assuming a proportional increase to other eastbound visitors.
Oahu

Oahu visitor arrivals are projected as a percentage of visitor arrivals to the State and are also presented in Table 8. A decreasing proportion of the State's visitors are projected to visit Oahu.

Over the next 20 years, the percentage of State visitors staying overnight on Oahu is projected to decline by about 8% to a 70% share of total State visitors. Eastbound visitors to Oahu are projected to fall from almost 100% of visitors to the State in 1985 to about 90% by 2005. Stabilization in Oahu's market share could result from increasing resort development on Oahu which provides the type of vacation experience currently found on the neighbor islands.

Visitors to Oahu are projected to increase by about 2.2% annually through 2005, compared to 2.6% for the State. Oahu visitors are estimated to increase by about 50% from about 4 million in 1985 to 6.2 million by the year 2005. Of this number, westbound arrivals are projected to account for about 68%, while eastbound visitors are projected to account for about 32%.
Resorts in Hawaii

A resort is a self-contained community which provides a variety of facilities for the accommodation, leisure, and other needs of the visitors. Resorts must be known to a sufficient number of potential visitors to attract and motivate travel in themselves.

The following discussion reviews the characteristics of major resorts in Hawaii to provide a perspective as to the market position of Mokuleia as a secondary resort area.

**Oahu Resorts**

Oahu includes two major existing resorts outside of Waikiki. They are:

- Turtle Bay Resort.
- Makaha Resort.

A third resort, West Beach, is planned for development in the Ewa area on Oahu.

The characteristics of the three resorts are summarized in terms of physical characteristics, existing developments, room rates and prices, market appeal and visitor profile in Table 9. Resort
## TABLE 9

**Characteristics of Oahu Resorts**

<table>
<thead>
<tr>
<th></th>
<th>Makaha</th>
<th>Turtle Bay</th>
<th>Proposed Resort</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site area (acres) 1/</strong></td>
<td>617</td>
<td>808</td>
<td>642</td>
</tr>
<tr>
<td><strong>Distance from Interisland airport</strong></td>
<td>31 miles</td>
<td>37 miles</td>
<td>20 miles</td>
</tr>
<tr>
<td><strong>Special site characteristics</strong></td>
<td>Secluded valley with equestrian trails.</td>
<td>Protected bay. Bird sanctuary. Equestrian center (planned).</td>
<td>Four manmade lagoons (2 to 15.5 acres). Public park center. Historic railroad.</td>
</tr>
<tr>
<td><strong>Existing development</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel rooms</td>
<td>195</td>
<td>467</td>
<td>2,000 (resort)</td>
</tr>
<tr>
<td>Condominium units</td>
<td>611</td>
<td>360</td>
<td>2,000 (resort)</td>
</tr>
<tr>
<td>Single-family lots</td>
<td>806</td>
<td>855</td>
<td>5,200 (residential)</td>
</tr>
<tr>
<td>Total units</td>
<td>1,612</td>
<td>1,682</td>
<td>7,350 (total)</td>
</tr>
<tr>
<td><strong>Proposed at completion (units)</strong></td>
<td>Not available</td>
<td>4,350</td>
<td>9,200</td>
</tr>
<tr>
<td><strong>Amenities</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Beach</td>
<td>No ocean frontage. Makaha Beach shuttle bus.</td>
<td>Mostly rocky, limited swimming except for Kamela Bay.</td>
<td>Rocky, limited swimming. Two sandy beaches to be created.</td>
</tr>
<tr>
<td>Shoreline (linear feet)</td>
<td>-</td>
<td>3 miles</td>
<td>1.9 miles</td>
</tr>
<tr>
<td>Commercial space in shopping centers</td>
<td>-</td>
<td>40,000sf (planned)</td>
<td>185,000sf</td>
</tr>
<tr>
<td>Golf course holes</td>
<td>36</td>
<td>18</td>
<td>18</td>
</tr>
<tr>
<td>Tennis courts</td>
<td>4</td>
<td>10</td>
<td>Not determined</td>
</tr>
<tr>
<td>Quarte activities</td>
<td>Horseback riding</td>
<td>Snorkeling, scuba diving, horseback riding, dune cycling</td>
<td>Hawaiian cultural center, boating</td>
</tr>
<tr>
<td><strong>Hotel developments</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel class</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1986 average hotel room rates 2/</td>
<td>$75 - $200</td>
<td>$75 - $100</td>
<td>Not available</td>
</tr>
<tr>
<td>Single</td>
<td>$75</td>
<td>$75</td>
<td>Not available</td>
</tr>
<tr>
<td>Double/triple</td>
<td>$200</td>
<td>$100</td>
<td>Not available</td>
</tr>
<tr>
<td><strong>Typical condominium unit sales prices (1984) 3/</strong></td>
<td>Not available</td>
<td>$60,000 - $90,000</td>
<td>Not available</td>
</tr>
<tr>
<td><strong>Market appeal</strong></td>
<td>Secluded, heavily oriented to golf, tennis, horseback riding. Operations hampered by lack of beach access and locational attributes.</td>
<td>Planned to be a major destination resort which would compete directly with neighbor island resorts. Close to major visitor attractions.</td>
<td>A quality resort and residential community with extensive recreational amenities.</td>
</tr>
<tr>
<td><strong>Typical visitor profile</strong></td>
<td>FIT visitors represent 70%. Resort guests include: 301 - 352 (local); 35 - 40 (eastbound); 25 - 30 (Japanese).</td>
<td>Oriented to both FIT and GIT guests from the mainland and Oahu.</td>
<td>Oriented more to FIT visitors.</td>
</tr>
</tbody>
</table>

---

1/ Includes all master-planned areas, including nondesignated or conservation and buffer areas. Portions may not be master-planned for development at this time.
3/ Hawaii Real Estate Investor, Multiple Listing Service, and discussions with developers or realtors of the respective resorts. Source: Discussions with developers, filed environmental impact statements and other published materials.
development on Oahu is far more extensive than those found on the neighbor islands.

**Neighbor Island Resorts**

Nine major resorts are on the neighbor islands. The characteristics of these resorts are summarized in Table 10.

Resort sizes vary between 400 units or lots at the Mauna Kea, Mauna Lani and Kalua Koi Resorts, and 5,500 units at Kaanapali Resort.

The appeal of these resorts generally stems from the locational characteristics and scope of facilities offered. The resorts typically have good swimming beaches and offer a variety of recreational amenities including golf, tennis, and water-oriented activities.

The resorts include a variety of hotel classes, ranging from economy to luxury. Resorts on Maui, Kauai, and Molokai cater to a broad range of guests while the resorts on the Island of Hawaii are oriented at either the tourist first-class market at Keauhou, or the luxury market at Mauna Kea, Mauna Lani, and the proposed development at Waikoloa.
### Characteristics of Neighbor Island Resorts

**TABLE 10 (page 1)**

<table>
<thead>
<tr>
<th>Mauikea Beach</th>
<th>Kauai Resorts</th>
<th>Naena Kea</th>
<th>Naena Lani</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site area (acres)</td>
<td>499 (existing resort)</td>
<td>890</td>
<td>1,100</td>
</tr>
<tr>
<td>Distance from interisland airport</td>
<td>17 miles (Kehole)</td>
<td>12 miles (Kehole)</td>
<td>26 miles (Kehole)</td>
</tr>
<tr>
<td>Existing development:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel rooms</td>
<td>548</td>
<td>1,307</td>
<td>310</td>
</tr>
<tr>
<td>Condominium units</td>
<td>-</td>
<td>832</td>
<td>23</td>
</tr>
<tr>
<td>Single-family lots</td>
<td>-</td>
<td>-</td>
<td>7</td>
</tr>
<tr>
<td>Total units</td>
<td>568</td>
<td>2,139</td>
<td>365</td>
</tr>
<tr>
<td>Amenities:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Beach</td>
<td>White sand</td>
<td>Rocky, poor swimming, public beach nearby</td>
<td>White sand</td>
</tr>
<tr>
<td>Shoreline (linear feet)</td>
<td>7,000</td>
<td>13,000</td>
<td>14,100</td>
</tr>
<tr>
<td>Percent usable for swimming</td>
<td>30%</td>
<td>60%</td>
<td>100%</td>
</tr>
<tr>
<td>Commercial space in shopping centers</td>
<td>Proposed</td>
<td>36</td>
<td>Proposed</td>
</tr>
<tr>
<td>Golf course holes</td>
<td>18</td>
<td>18</td>
<td>Proposed</td>
</tr>
<tr>
<td>Tennis courts</td>
<td>6</td>
<td>6</td>
<td>Jogging course, hiking, SCUBA diving, scuba diving, horseback riding, hiking</td>
</tr>
<tr>
<td>Boating activities</td>
<td>Deep-sea fishing, SCUBA diving, catamaran cruises, sailing, windsurfing</td>
<td>Deep-sea fishing, SCUBA diving, catamaran cruises, horseback riding, horseback riding</td>
<td></td>
</tr>
<tr>
<td>Hotel development:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel class</td>
<td>Luxury/first-class</td>
<td>Tourist/first-class</td>
<td>Luxury</td>
</tr>
<tr>
<td>1984 average hotel room rates:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single</td>
<td>$85 - $200</td>
<td>$62 - $105</td>
<td>$215 - $310</td>
</tr>
<tr>
<td>Double/triple</td>
<td>$120 - $200</td>
<td>$105 - $105</td>
<td>$230 - $225</td>
</tr>
<tr>
<td>Typical condominium unit sales prices (1984)</td>
<td>$200,000 - $560,000</td>
<td>$595,000 - $1,770,000</td>
<td>$570,000 - $1,450,000</td>
</tr>
<tr>
<td>Market appeal</td>
<td>Quality hotel and golf course development with planned luxury hotels and condominiums.</td>
<td>Activity-oriented resort which benefits from proximity to the Kalana-Kona resort area and area visitor attractions.</td>
<td>World-class destination resort which enjoys a wide reputation and loyal visitor base.</td>
</tr>
<tr>
<td>Typical visitor profile</td>
<td>Resort-oriented mainly to GTO visitors and convention groups. Planned development to cater to the very upscale world-class market. Average room rates for the planned hotels range from between $700 to $1,000 per day.</td>
<td>Oriented to both GTO and FIT visitors from middle to upper income groups.</td>
<td>Caters to travelers who are generally mature, very affluent and return annually.</td>
</tr>
</tbody>
</table>

---

1/ Includes all master-planned areas, including undeveloped or conservation buffer areas. Portions may not be master-planned for development at this time.


3/ Hawaii Real Estate Investor, Multiple Listing Service and discussions with developers or realtors of the respective resort.
### MONHELEIA
Characteristics of Neighbor Island Resorts, Continued

#### TABLE 10 (page 2)

<table>
<thead>
<tr>
<th>Site area (acres)</th>
<th>Kaua‘i Res.</th>
<th>Maui Res.</th>
<th>Molokai Res.</th>
<th>Kaua‘i - Princeville</th>
<th>Molokai - Kahului</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,169</td>
<td>1,450</td>
<td>750</td>
<td>1,713</td>
<td>1,530</td>
<td></td>
</tr>
<tr>
<td>28 miles (Kaua‘i)</td>
<td>15 miles (Kaua‘i)</td>
<td>32 miles (Kaua‘i)</td>
<td>28 miles (Kaua‘i)</td>
<td>11 miles (Kaua‘i)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Existing development:</th>
<th>Kaua‘i Res.</th>
<th>Maui Res.</th>
<th>Molokai Res.</th>
<th>Kaua‘i - Princeville</th>
<th>Molokai - Kahului</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotel rooms</td>
<td>1,657</td>
<td>940</td>
<td>194</td>
<td>780</td>
<td>292</td>
</tr>
<tr>
<td>Condominium units</td>
<td>1,755</td>
<td>900</td>
<td>528</td>
<td>900</td>
<td>78</td>
</tr>
<tr>
<td>Single-family lots</td>
<td>76</td>
<td>110</td>
<td>-</td>
<td>617</td>
<td>30</td>
</tr>
<tr>
<td>Total units</td>
<td>2,482</td>
<td>1,750</td>
<td>722</td>
<td>1,737</td>
<td>570</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Beach</td>
<td>White sand</td>
<td>White sand</td>
<td>Sandy cove</td>
<td>Sandy ocean cliff</td>
<td>White sand</td>
</tr>
<tr>
<td>Shoreline (linear feet)</td>
<td>10,400</td>
<td>7,900</td>
<td>9,500</td>
<td>14,300</td>
<td>12,700</td>
</tr>
<tr>
<td>Percent usable for</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>swimming</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial space in</td>
<td>60,000</td>
<td>70,000</td>
<td>22,000</td>
<td>20,000</td>
<td></td>
</tr>
<tr>
<td>shopping centers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Golf course holes</td>
<td>36</td>
<td>30</td>
<td>30</td>
<td>27</td>
<td>18</td>
</tr>
<tr>
<td>Tennis courts</td>
<td>30</td>
<td>14</td>
<td>10</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Snorkeling activities</td>
<td>6-mile scenic railroad, swimming, catamaran cruises, shuffleboard, sailing lessons</td>
<td>Scuba diving, excursion boats</td>
<td>All water sports</td>
<td>Fishing, horseback riding, rowing, hiking, boating</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hotel developments:</th>
<th>First-class/tourist</th>
<th>First-class/tourist</th>
<th>First-class/tourist</th>
<th>First-class/tourist</th>
</tr>
</thead>
<tbody>
<tr>
<td>1984 average hotel room rate</td>
<td>$32 - $195</td>
<td>$85 - $175</td>
<td>$110 - $300</td>
<td>$120 - $145</td>
</tr>
<tr>
<td>First-class/triple</td>
<td>$40 - $175</td>
<td>$90 - $175</td>
<td>$140 - $300</td>
<td>$140 - $185</td>
</tr>
<tr>
<td>Typical condominium unit sales prices (1984)</td>
<td>$150,000 - $290,000</td>
<td>$150,000 - $320,000</td>
<td>$180,000 - $300,000</td>
<td>$100,000 - $240,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Market appeal</th>
<th>Heavily oriented towards hotels. Promoted as an integrated resort. All attractions are identified as one.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heavily oriented towards hotels</td>
<td>Mixed-use of hotel and condominium units at a wide range of prices and orientations. Heavily recreation-oriented due to prominent golf and tennis facilities.</td>
</tr>
<tr>
<td>Oriented to sedan, luxury hotel and condominium unit development naturally integrated into aeshing certain.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Typical visitor profile</th>
<th>About evenly divided between CFT and FIT visitors. Primarily attracts younger, upper middle and middle-income travelers from the West Coast and Canada.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wide variety of visitors including both CFT and FIT guests, typically.</td>
<td></td>
</tr>
<tr>
<td>Geared entirely to affluent individual visitors who return annually.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Notes</th>
<th>1/ Ibid.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/ Ibid.</td>
<td></td>
</tr>
<tr>
<td>3/ Ibid.</td>
<td></td>
</tr>
</tbody>
</table>

Visitor Accommodations Inventory

Almost 96% of Hawaii’s visitors stay in hotels or condominium units used as transient visitor accommodations. The inventory of visitor accommodations in Hawaii is described in terms of its current and planned size and composition. Oahu’s existing and planned inventory is also discussed below.

Current Inventory

Visitor accommodations in the State include hotel rooms and condominium units available for transient use. According to the Hawaii Visitors Bureau (HVB), 65,900 visitor accommodations in 485 visitor facilities exist in Hawaii, as shown in Table II. This inventory represents an increase of 142% since 1970, an increase of about 6% annually. Rooms on Maui grew the fastest at a rate of about 11.6% compounded annually, or about twice the rate experienced by the State as a whole. In comparison, the other countries experienced a visitor room growth of between 5% and 6% compounded annually.

Visitor accommodations on the neighbor islands have been significantly upgraded in recent years, primarily because of the expansion of facilities at existing and emerging master-planned resorts.
<table>
<thead>
<tr>
<th>Year</th>
<th>Honolulu</th>
<th>Hawaii</th>
<th>Kauai</th>
<th>Maui</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>1970</td>
<td>19,050</td>
<td>3,182</td>
<td>2,567</td>
<td>2,720</td>
<td>27,519</td>
</tr>
<tr>
<td>1975</td>
<td>25,428</td>
<td>5,386</td>
<td>3,145</td>
<td>6,018</td>
<td>39,977</td>
</tr>
<tr>
<td>1976</td>
<td>25,773</td>
<td>5,936</td>
<td>3,724</td>
<td>7,378</td>
<td>42,811</td>
</tr>
<tr>
<td>1977</td>
<td>27,827</td>
<td>6,051</td>
<td>3,868</td>
<td>8,397</td>
<td>46,143</td>
</tr>
<tr>
<td>1978</td>
<td>29,193</td>
<td>6,064</td>
<td>4,097</td>
<td>8,680</td>
<td>48,034</td>
</tr>
<tr>
<td>1979</td>
<td>31,411</td>
<td>6,056</td>
<td>4,064</td>
<td>9,654</td>
<td>51,185</td>
</tr>
<tr>
<td>1980</td>
<td>34,393</td>
<td>6,260</td>
<td>4,435</td>
<td>10,483</td>
<td>55,571</td>
</tr>
<tr>
<td>1981</td>
<td>33,566</td>
<td>6,859</td>
<td>4,832</td>
<td>11,245</td>
<td>56,502</td>
</tr>
<tr>
<td>1982</td>
<td>34,766</td>
<td>7,106</td>
<td>5,207</td>
<td>12,278</td>
<td>59,357</td>
</tr>
<tr>
<td>1983</td>
<td>34,378</td>
<td>7,368</td>
<td>4,475</td>
<td>12,680</td>
<td>58,901</td>
</tr>
<tr>
<td>1984</td>
<td>37,910</td>
<td>7,209</td>
<td>5,501</td>
<td>13,336</td>
<td>63,956</td>
</tr>
<tr>
<td>1985</td>
<td>38,600</td>
<td>7,511</td>
<td>5,656</td>
<td>14,152</td>
<td>65,919</td>
</tr>
</tbody>
</table>

Percent of state:

<table>
<thead>
<tr>
<th>Year</th>
<th>Honolulu</th>
<th>Hawaii</th>
<th>Kauai</th>
<th>Maui</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>1970</td>
<td>69.2%</td>
<td>11.6%</td>
<td>9.3%</td>
<td>9.9%</td>
<td>100.0%</td>
</tr>
<tr>
<td>1985</td>
<td>58.6%</td>
<td>11.4%</td>
<td>8.6%</td>
<td>21.5%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Annually compounded percentage increase - 1970 to 1985

<table>
<thead>
<tr>
<th></th>
<th>Honolulu</th>
<th>Hawaii</th>
<th>Kauai</th>
<th>Maui</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>1970</td>
<td>4.8</td>
<td>5.9</td>
<td>5.4</td>
<td>11.6</td>
<td>6.0</td>
</tr>
</tbody>
</table>

1/ Number of visitor units as of June of each year; includes condominium units.

Composition of Existing Visitor Accommodations

Condominium units are becoming an increasingly important alternative to hotel rooms as visitor accommodations. Currently, about 21,800 condominium units, or 33% of the State's visitor units, are used by visitors. Molokai and Maui have the highest proportions of their condominium units, about 95% and 58%, respectively, used as visitor accommodations, as shown in Table 12.

The rate of growth of condominium units has far exceeded that of hotel units. Over the past 15 years, the number of visitor accommodations has increased at an average annual rate of 4.2%. During the same period, condominium units have increased by about 34%, and hotel and apartment units have increased by only about 1%.

The more rapid increase in condominium units in visitor use results from:

- Lower construction costs of condominium projects which typically have less extensive amenities and common areas as compared to hotels.
- Ability to finance condominium projects through the sale of units to individual investors and buyers.
- Tax benefits to individual benefits and buyers.
<table>
<thead>
<tr>
<th>Island</th>
<th>Number of condominium units</th>
<th>Percent of total visitor units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oahu</td>
<td>9,016</td>
<td>23.4%</td>
</tr>
<tr>
<td>Hawaii</td>
<td>2,279</td>
<td>30.3</td>
</tr>
<tr>
<td>Kauai</td>
<td>2,076</td>
<td>36.7</td>
</tr>
<tr>
<td>Maui</td>
<td>7,838</td>
<td>58.0</td>
</tr>
<tr>
<td>Molokai</td>
<td>595</td>
<td>94.9</td>
</tr>
<tr>
<td>Lanai</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>State</td>
<td>21,804</td>
<td>33.1%</td>
</tr>
</tbody>
</table>

- Increased recognition of the resort condominium as a visitor accommodation alternative.

- Competitive room rates.

**Visitor Accommodations on Oahu**

As of February 1985, 38,600 visitor units in 170 facilities on Oahu represented about 59% of the State's inventory. About 92% of these units are in the Waikiki and Ala Moana areas, as shown in Table 13. This represents about 59% of the State's inventory. In contrast with other visitor regions on the neighbor islands where visitor units are more widely distributed on the islands, the Honolulu, airport, Leeward and Windward Oahu areas include very few of the islands' visitor units.

**Planned Developments on Oahu**

Excluding Mokuleia, 9,300 to 9,400 hotel and condominium units are currently planned in seven major developments on Oahu, as shown in Table 14. About 7,800 units, or 84% of the total planned inventory, would be at Turtle Bay, West Beach, and Makaha resorts. These developments include four first-class or luxury hotels expected to be developed by the end of the decade. They include:
<table>
<thead>
<tr>
<th>Area</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waikiki</td>
<td>33,879</td>
<td>87.8%</td>
</tr>
<tr>
<td>Ala Moana</td>
<td>1,609</td>
<td>4.2</td>
</tr>
<tr>
<td>Honolulu</td>
<td>74</td>
<td>0.2</td>
</tr>
<tr>
<td>Airport</td>
<td>693</td>
<td>1.8</td>
</tr>
<tr>
<td>Leeward Oahu</td>
<td>1,468</td>
<td>3.7</td>
</tr>
<tr>
<td>Windward Oahu</td>
<td>877</td>
<td>2.3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>38,600</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>

TABLE 14
MOKULEIA
Major Proposed Hotel and Condominium Units on Oahu

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of rooms</th>
<th>Development status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turtle Bay Resort: North Shore</td>
<td>3,513</td>
<td>First hotel design underway.</td>
</tr>
<tr>
<td>Hotel units</td>
<td>1,450</td>
<td></td>
</tr>
<tr>
<td>Condominium units</td>
<td>2,063</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3,513</td>
<td></td>
</tr>
<tr>
<td>West Beach Resort: Ewa</td>
<td>4,000</td>
<td>Construction to begin in late 1986.</td>
</tr>
<tr>
<td>Hotel units</td>
<td>2,000</td>
<td></td>
</tr>
<tr>
<td>Condominium units</td>
<td>2,000</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4,000</td>
<td></td>
</tr>
<tr>
<td>Sheraton Makaha Resort and Country Club Makaha</td>
<td>300 1/ Potential expansion.</td>
<td></td>
</tr>
<tr>
<td>Yacht Harbor Plaza Ala Moana</td>
<td>550-600</td>
<td>Anticipated to begin late-1986; hotel room configuration dependent upon number of condominiums.</td>
</tr>
<tr>
<td>Hotel and condominium units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Halekulani Hotel Waikiki</td>
<td>300</td>
<td>Expansion expected to be completed by October 1987.</td>
</tr>
<tr>
<td>Hotel units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aloha Tower Downtown 400</td>
<td></td>
<td>First-class to luxury business hotel.</td>
</tr>
<tr>
<td>Hotel units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Laie North Shore 250 1/</td>
<td></td>
<td>No development plans known.</td>
</tr>
<tr>
<td>Total planned units on Oahu</td>
<td>9,313-9,363</td>
<td></td>
</tr>
</tbody>
</table>

N/A = Not available.
1/ Based on visit or unit limit specified in the special provisions of the development plan for the area.
Sources: Discussions with developers, filed environmental impact statements or other published sources.
Historical Oahu Hotel Market Performance

The discussion below reviews the historical market performance of Oahu visitor accommodations in terms of occupancy levels, average room rates and visitor room nights.

Hotel occupancy levels and average daily room rates are surveyed monthly by Pannell, Kerr, Forster (PKF). However, these surveys exclude several major hotel chains (such as Sheraton and Hilton) and, therefore, may distort actual industry averages. However, the PKF survey averages provide an indication of general occupancy levels and room rates.

Occupancy Levels

Occupancy levels on Oahu have continued to improve during the past six years. Occupancy levels increased from about 72% in 1980 to nearly 82% in 1985, as shown in Table 15.
TABLE 15
MOKULEIA
Visitor Accommodations Occupancy Levels
State of Hawaii
1980 to 1985

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Oahu: Waikiki:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>On-beach</td>
<td>73.9</td>
<td>72.1</td>
<td>72.7</td>
<td>74.7</td>
<td>81.7</td>
<td>79.3</td>
</tr>
<tr>
<td>Off-beach (w/restaurant)</td>
<td>73.2</td>
<td>73.8</td>
<td>80.6</td>
<td>79.1</td>
<td>85.7</td>
<td>83.7</td>
</tr>
<tr>
<td>Off-beach (w/o restaurant)</td>
<td>66.5</td>
<td>76.1</td>
<td>80.1</td>
<td>74.4</td>
<td>73.8</td>
<td>80.4</td>
</tr>
<tr>
<td>Total Waikiki</td>
<td>71.7</td>
<td>73.9</td>
<td>77.7</td>
<td>76.6</td>
<td>82.6</td>
<td>N/A</td>
</tr>
<tr>
<td>Other Oahu</td>
<td>74.6</td>
<td>75.3</td>
<td>79.4</td>
<td>73.3</td>
<td>85.0</td>
<td>84.5</td>
</tr>
<tr>
<td>Total Oahu</td>
<td>72.3</td>
<td>74.1</td>
<td>77.8</td>
<td>75.8</td>
<td>81.2</td>
<td>81.5</td>
</tr>
<tr>
<td>Hawaii</td>
<td>51.0</td>
<td>44.9</td>
<td>44.0</td>
<td>44.7</td>
<td>55.6</td>
<td>57.6</td>
</tr>
<tr>
<td>Maui</td>
<td>73.0</td>
<td>70.3</td>
<td>73.9</td>
<td>75.2</td>
<td>80.5</td>
<td>78.5</td>
</tr>
<tr>
<td>Kauai</td>
<td>69.6</td>
<td>62.7</td>
<td>57.5</td>
<td>57.2</td>
<td>63.0</td>
<td>64.8</td>
</tr>
<tr>
<td>State</td>
<td>69.3</td>
<td>68.3</td>
<td>70.4</td>
<td>69.7</td>
<td>76.0</td>
<td>76.1</td>
</tr>
</tbody>
</table>

N/A = Not available.
Note: Data presented excludes several major hotels which are not surveyed.
Source: Parnell, Kerr, Forster, Trends in the Hotel Industry, monthly.
Since 1980, occupancy levels on Oahu have exceeded statewide occupancy levels by 3% to 7%. Occupancy levels are slightly higher outside Waikiki, primarily because of the smaller number of visitor units and a more discriminating market.

Average Room Rates

Average room rates achieved by Oahu hotels have been 83% to 90% of average statewide room rates since 1980, as shown below:

<table>
<thead>
<tr>
<th></th>
<th>Oahu</th>
<th>State of Hawaii</th>
<th>Oahu as a percent of State</th>
</tr>
</thead>
<tbody>
<tr>
<td>1980</td>
<td>$42.70</td>
<td>$47.37</td>
<td>90.1%</td>
</tr>
<tr>
<td>1981</td>
<td>43.05</td>
<td>49.73</td>
<td>86.7</td>
</tr>
<tr>
<td>1982</td>
<td>44.88</td>
<td>51.87</td>
<td>86.5</td>
</tr>
<tr>
<td>1983</td>
<td>46.93</td>
<td>54.78</td>
<td>85.7</td>
</tr>
<tr>
<td>1984</td>
<td>49.45</td>
<td>59.25</td>
<td>83.5</td>
</tr>
<tr>
<td>1985</td>
<td>58.29</td>
<td>70.24</td>
<td>83.0</td>
</tr>
</tbody>
</table>

Source: Pannell, Kerr, Forster.

The differential between Oahu and statewide daily room rates is increasing. Oahu room rates could be expected to decline even further unless newer and higher-quality visitor facilities are developed.
Average Daily Room Demand

Average daily room demand is estimated based on the occupancy rates experienced by Oahu hotels and the number of visitor units. Since 1982, average daily room demand is estimated to have increased at a rate of about 5.3% per year, from 27,000 room nights in 1982 to 31,500 in 1985, as shown below:

Visitor Room Nights on Oahu
1982 to 1985

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Visitor room inventory</td>
<td>34,766</td>
<td>34,378</td>
<td>37,910</td>
<td>38,600</td>
</tr>
<tr>
<td>Average annual occupancy rate</td>
<td>77.8%</td>
<td>75.8%</td>
<td>81.2%</td>
<td>81.5%</td>
</tr>
<tr>
<td>Visitor room nights</td>
<td>27,000</td>
<td>26,100</td>
<td>30,800</td>
<td>31,500</td>
</tr>
</tbody>
</table>

Projected Oahu Room Requirements

The number of visitor rooms on Oahu which are required to serve as visitor accommodations to island visitors are projected in the following section. The major assumptions used in projecting visitor room demand and unit requirements, shown in Table 15, are discussed as follows:

Visitors to Oahu: Number of westbound and eastbound visitors staying overnight or longer, as discussed previously.
<table>
<thead>
<tr>
<th>Metric</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percent using commercial accommodations:</td>
<td>Proportion of visitors using visitor accommodations, including hotels and condominiums. About 90% of all westbound and 96% of all eastbound visitors are assumed to use visitor accommodations.</td>
</tr>
<tr>
<td>Average length of stay:</td>
<td>Visitor stay projected to increase marginally based on historical patterns on Oahu and in the State since 1970. Average stay is assumed to increase to 6.2 days by the year 2005 for westbound visitors and remain about 1.7 days for the shorter staying eastbound visitors.</td>
</tr>
<tr>
<td>Average persons per room:</td>
<td>Based on data provided by the HVB regarding average party size. Average party size has increased slightly since 1970 and is assumed to stabilize at 1.9 persons for westbound and 1.7 persons for eastbound visitors.</td>
</tr>
</tbody>
</table>
Based on these assumptions, daily visitor room demand is estimated to increase by nearly 50% between 1985 and 2005 from 31,000 units to 46,000 units, as shown in Table 16.

Over the long term, a stabilized occupancy level between 75% and 80% is considered an appropriate and financially feasible balance between the supply and demand for visitor units. As a result, the total number of visitor units on Oahu required to meet the projected demand is estimated at about 57,500 rooms by 2005 assuming an 80% occupancy level, and 61,300 rooms assuming a 75% occupancy level, as shown in Table 17.

The projections support between 18,900 and 22,700 additional visitor units between 1985 and 2005. These estimates of additional room requirement are in excess of the units currently planned. Assuming successful completion of those additions outlined in Table 14, a need for about 9,500 to 13,300 new units is projected by 2005.

Market Assessment For Development At Mokuleia

Successful hotel development at Mokuleia is dependent on the hotel's ability to become established as attractive and competitive visitor destinations in the State of Hawaii.
<table>
<thead>
<tr>
<th>Year</th>
<th>Westbound Visitors</th>
<th>Percent Using Commercial Accommodations</th>
<th>Average Length of Stay</th>
<th>Average Persons per Room</th>
<th>Average Daily Visitor Room Nights</th>
<th>Eastbound Visitors</th>
<th>Percent Using Commercial Accommodations</th>
<th>Average Length of Stay</th>
<th>Average Persons per Room</th>
<th>Average Daily Visitor Room Nights</th>
<th>Total Daily Visitor Room Demand</th>
</tr>
</thead>
<tbody>
<tr>
<td>1980</td>
<td>2,398,740</td>
<td>97.62%</td>
<td>6.1</td>
<td>1.8</td>
<td>19,648</td>
<td>884,819</td>
<td>98.42%</td>
<td>3.5</td>
<td>1.6</td>
<td>5,218</td>
<td>24,866</td>
</tr>
<tr>
<td>1981</td>
<td>2,398,480</td>
<td>88.7</td>
<td>5.7</td>
<td>1.8</td>
<td>18,590</td>
<td>956,953</td>
<td>98.3</td>
<td>3.9</td>
<td>1.6</td>
<td>6,282</td>
<td>24,872</td>
</tr>
<tr>
<td>1982</td>
<td>2,589,190</td>
<td>89.4</td>
<td>5.9</td>
<td>1.8</td>
<td>20,834</td>
<td>960,539</td>
<td>97.9</td>
<td>4.1</td>
<td>1.7</td>
<td>6,214</td>
<td>27,048</td>
</tr>
<tr>
<td>1983</td>
<td>2,591,635</td>
<td>87.9</td>
<td>5.8</td>
<td>1.8</td>
<td>20,247</td>
<td>967,140</td>
<td>95.6</td>
<td>3.9</td>
<td>1.7</td>
<td>5,811</td>
<td>26,051</td>
</tr>
<tr>
<td>1984</td>
<td>2,901,320</td>
<td>88.8</td>
<td>6.1</td>
<td>1.8</td>
<td>24,002</td>
<td>1,128,529</td>
<td>95.6</td>
<td>3.9</td>
<td>1.7</td>
<td>6,781</td>
<td>30,783</td>
</tr>
<tr>
<td>1985</td>
<td>2,951,600</td>
<td>89.0</td>
<td>6.0</td>
<td>1.8</td>
<td>24,000</td>
<td>1,155,000</td>
<td>96.0</td>
<td>3.9</td>
<td>1.7</td>
<td>7,000</td>
<td>31,000</td>
</tr>
</tbody>
</table>

1/ Estimated based on historical room nights demand.
2/ Estimated based on visitor arrivals multiplied by the percent utilizing hotels and average length of stay divided by the average number of persons per room divided by 365 days.
3/ Historical eastbound visitor characteristics based on characteristics of Japanese visitors to Hawaii as reported by the Hawaii Visitors Bureau.
Source: John Child & Company, Inc.
**TABLE 17**  
**MKULEIA**  
Projected Visitor Rooms Required on Oahu  
1985 to 2005

<table>
<thead>
<tr>
<th>Year</th>
<th>Total daily visitor room demand</th>
<th>75% Occupancy</th>
<th>80% Occupancy</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Rooms required</td>
<td>Existing inventory</td>
</tr>
<tr>
<td>1985</td>
<td>31,000</td>
<td>41,300</td>
<td>38,600</td>
</tr>
<tr>
<td>1990</td>
<td>36,200</td>
<td>48,300</td>
<td>38,600</td>
</tr>
<tr>
<td>1995</td>
<td>41,300</td>
<td>55,100</td>
<td>38,600</td>
</tr>
<tr>
<td>2000</td>
<td>44,400</td>
<td>59,200</td>
<td>38,600</td>
</tr>
<tr>
<td>2005</td>
<td>46,000</td>
<td>61,300</td>
<td>38,600</td>
</tr>
</tbody>
</table>

*Source: John Child & Company, Inc.*
The competitive position of hotel development at Mokuleia can be enhanced through the creation of a planned community. Factors which could differentiate Mokuleia from existing resorts and lead to successful hotel development include:

- **Unique Location on Oahu** - A community located at Mokuleia would be readily accessible to and from Waikiki, the Honolulu central business district and other population centers around the island. It could be planned to take into consideration the oceanfront and the unique, rural environment of the area.

- **Range of Recreational Opportunities** - Mokuleia is known for its scenic and recreational amenities. A resort development could enhance and expand the recreational resources of the area.

**Anticipated Market Segments**

Hotels at Mokuleia could attract both local residents and off-island visitors because of the following factors:

- Recreational opportunities would attract and support visitors who seek a variety of leisure type facilities.
• Proximity of the area relative to Waikiki and other major points of interest on the island provides expanded recreational and cultural alternatives not found in similar resorts on the outer islands.

• Its location to shopping, dining and other affordable-priced recreational opportunities in the North Shore area would provide added attractions to the anticipated market segment.

The anticipated market segments for hotel development at Mokuleia are described as follows:

• **Free Independent Travelers (FITs)** - This segment includes middle-class repeat visitors to the State who seek a quality environment in a new setting that offers extensive recreational facilities and amenities.

• **Meeting and Conference Groups** - This segment includes small- to medium-sized groups who seek a range of recreational opportunities to complement their business activities. Occupationaly, this group could be expected to include mid-level corporate managers, professionals and successful entrepreneurs.
Island and State Residents - This segment includes local residents who would take advantage of the facilities for short periods of time, especially during weekends and holidays. Given appropriate marketing, this segment may also overlap with the meeting and conference group market described above.

Market Share

The supportable hotel rooms depends on a hotel's market position in relationship to the overall room demand. Achieved market capture rates are related to:

- Market segments attracted.
- Relative size of the visitor room demand.
- Perceived attractiveness of the facility and the quality and range of amenities provided.
- Competitive strength of other established resorts.
- Maturity of the hotel developments and their reputation.
Supportable Hotel Rooms on Oahu

The anticipated supply and demand relationships for visitor units on Oahu, comprised of hotel rooms and condominium units, were discussed earlier in this section. Based on the analysis, the visitor industry could be expected to require about 18,900 to 22,700 additional rooms by 2005. This represents a requirement of 9,500 to 13,300 rooms in addition to the inventory which is currently being planned for Oahu.

Hotels are expected to continue to account for about 70% of total demand for visitor rooms on Oahu. At the assumed occupancy levels, the number of supportable hotel rooms on Oahu is projected to range between 40,300 to 42,900 rooms by 2005, as shown in Table 18.

2. Statement of Objectives

General Plan Objective B under Economic Activity calls for maintaining a viability of Oahu visitor industry, and meeting the growth needs of the industry is considered a vital component of maintaining its viability.

About 92% of the existing visitor units on Oahu are in the Waikiki and Ala Moana areas (representing about 59% of the State's inventory). Although Waikiki will continue to be the primary resort
### TABLE 18

**MOKULÈIA**  
Projected Hotel Room Requirement on Oahu

<table>
<thead>
<tr>
<th>Year</th>
<th>Required visitor units</th>
<th>Hotel room percentage</th>
<th>Required hotel units</th>
<th>75% Occupancy</th>
<th>80% Occupancy</th>
<th>Required visitor units</th>
<th>Hotel room percentage</th>
<th>Required hotel units</th>
</tr>
</thead>
<tbody>
<tr>
<td>1990</td>
<td>48,300</td>
<td>70%</td>
<td>33,800</td>
<td>45,300</td>
<td>70%</td>
<td>31,700</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1995</td>
<td>55,100</td>
<td>70</td>
<td>38,600</td>
<td>51,600</td>
<td>70</td>
<td>36,100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2000</td>
<td>59,200</td>
<td>70</td>
<td>41,400</td>
<td>55,500</td>
<td>70</td>
<td>38,900</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2005</td>
<td>61,300</td>
<td>70</td>
<td>42,900</td>
<td>57,500</td>
<td>70</td>
<td>40,300</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: John Child & Company, Inc.
area on Oahu, the General Plan calls for no more growth in visitor units in this area and, instead, directs its policies to the improvement of the environment in Waikiki and in the development of off-Waikiki areas (Secondary Resort Areas).

Currently, the General Plan identifies four (4) Secondary Resort Areas. In designating Secondary Resort Areas, the General Plan does not specify the number of visitor units each area is to accommodate. This is a function of the Development Plans.

The General Plan Secondary Resort Areas and the number of visitor units permitted under the respective Development Plans are as follows:

<table>
<thead>
<tr>
<th>EXISTING GP SECONDARY RESORT AREAS</th>
<th>DEVELOPMENT PLAN AREA/VISITOR UNITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Beach</td>
<td>Ewa/4,000 units</td>
</tr>
<tr>
<td>Kahuku</td>
<td>Koolauloa/4,000 units</td>
</tr>
<tr>
<td>Makaha</td>
<td>Waianae/ 500 units</td>
</tr>
<tr>
<td>Laie</td>
<td>Laie/ 300 units</td>
</tr>
</tbody>
</table>

This total, together with units already built in Waikiki and other areas, will not meet the expected demand for visitor accommodations through the year 2005. According to John Child and Company, as many as 13,000 more visitor units on Oahu will be needed.
Since Waikiki cannot be expected to substantially contribute to the supply of additional visitor units to meet projected visitor demands, and full development of the existing Secondary Resort Areas still leave a shortfall, the need exists to establish other Secondary Resort Areas.

The designation of Mokuleia as a Secondary Resort Area can help meet the need for additional visitor units, thereby contributing to the economic viability of the visitor industry. A Mokuleia Secondary Resort Area would also offer an opportunity to contribute to the general welfare and prosperity of the residents of the area, as well as the general public by:

- Creating jobs and full employment opportunities.
- Encouraging economic growth opportunities for existing and new businesses.
- Improving and expanding on the recreational resources of the area.
- Assisting in the improvement of need services and facilities.
PART III
DESCRIPTION

A. GENERAL DESCRIPTION OF THE ACTION'S TECHNICAL, ECONOMIC, SOCIAL AND ENVIRONMENTAL CHARACTERISTICS

1. Technical Characteristics

The proposed action does not involve a site-specific Tax Map Key parcel location for resort development, nor does it involve a project-specific proposal for resort development. Therefore, it is not a proposal to change the land use designations of any parcel of land. Instead, the proposed action is a policy change to the General Plan of the City and County of Honolulu.

The General Plan is a statement of the long-range social, economic, environmental, and design objectives for the general welfare and prosperity of the people of Oahu. These objectives contain statements of desirable conditions to be sought over the long run and statements of desirable conditions which can be achieved within an approximate 20-year time horizon.

The General Plan is a guide for all levels of government, private enterprise, neighborhood and citizen groups, organizations, and individual citizens in eleven (11) areas of concern:
1. Population
2. Economic
3. The natural environment
4. Housing
5. Transportation and utilities
6. Energy
7. Physical development and urban design
8. Public safety
9. Health and education
10. Culture and recreation
11. Government operations and fiscal management

These eleven (11) subject areas provide the framework for the City's expression of public policy concerning the needs of the people and the functions of government.

By design, the General Plan is a very general document, and one of its purposes is to establish a coherent set of broad guidelines which can be used in developing plans, programs, and legislation for guiding Oahu's future.

The proposed action is directed to the Economic area of concern (item 2 above). The objectives and policies for economic activity attempt to address the need for an adequate standard of living for residents and future generations. Issues of employment opportunities, viability of major industries, diversification of
the economic base, and the location of jobs are addressed in terms of what government can do to provide, encourage, and promote economic opportunities for the people of Oahu.

Objective B under Economic Activity calls for maintaining the viability of Oahu's visitor industry. Policies under Objective B call for prohibiting further growth in the permitted number of hotel and resort condominium units in Waikiki (Policy 5) and permitting the development of Secondary Resort Areas (outside of Waikiki) (Policy 6). Four Secondary Resort Areas are currently identified in the General Plan. The proposed action would add a fifth Secondary Resort Area, the area of Mokuleia. This would change Policy 6 to read:

Economic Activity
Objective B
Policy 6

Permit the development of secondary resort areas in West Beach, Mokuleia, Kahuku, Makaha, and Laie.

(new material is underlined)
2. **Economic Characteristics**

Including Mokuleia as a Secondary Resort Area in the General Plan offers an opportunity to help meet the projected need for additional visitor units, which would contribute to maintaining the viability of the visitor industry. It would also promote the diversification of the economic base in Mokuleia which today is limited primarily to agriculture, the employment in which has been declining over the years. New businesses as well as expansion of existing businesses would be encouraged helping to ensure full employment opportunities for residents of the area.

3. **Social Characteristics**

Mokuleia is characterized by three basic social groupings:

- **Military-Oriented:** These people work at various military facilities and generally live in rental units along Waialua Beach Road or Farrington Highway.

- **Ranch-Oriented People:** These people either live near the shoreline or in agricultural subdivisions and are involved primarily in equestrian activities and/or farming/grazing activities.

- **Beach-Front Residents:** These include non-military, non-ranch people who live on or near the beach.
A Secondary Resort Area designation at Mokuleia would encourage the introduction of a new visitor population to the area. During the processing of a site- or project-specific proposal (not part of this EIS), these social changes will require an in-depth analysis, as well as extensive dialogue with the community, to ensure that appropriate steps are taken to mitigate the social impacts.

4. Environmental Characteristics

The major physical features of the Mokuleia Area include the Waianae Mountain Range and the coastline. In between the land is relatively flat for a considerable distance and then gently slopes up increasing to the base of the Waianae Mountains. Several streams flow through the area. Waters off the shores of the Mokuleia area are classified "A". The entire coastline is in the City and County of Honolulu’s Shoreline Management Area and subject to the provisions of Ordinance 84-4.

Mokuleia is a scenic area best known for its recreational amenities. Existing recreational uses include camping facilities, beach parks, polo activity and recreational flying and gliding. As a Secondary Resort Area, Mokuleia offers the potential for enhancing and expanding the recreational resources of the area, including greater accessibility to the shoreline and mountain areas.
B. PROPOSAL AND PURPOSE OF THIS EIS

PROPOSAL: AMEND THE GENERAL PLAN TO INCLUDE MOKULEIA AS A SECONDARY RESORT AREA

NEED: MARKET STUDIES COMMISSIONED BY THE APPLICANT INDICATE THAT THERE WILL BE A NEED FOR 9,500 TO 13,300 ROOMS IN ADDITION TO THE INVENTORY WHICH IS BEING PLANNED FOR OAHU

IMPLEMENTATION OF PLANNING POLICIES: IMPLEMENTATION OF STATE AND COUNTY PLANNING POLICIES AS DESCRIBED IN SECTION IX OF THIS EIS

PURPOSE FOR EIS PREPARATION: TO SATISFY THE REQUIREMENTS OF CHAPTER 343, H.R.S.

C. USE OF PUBLIC FUNDS OR LANDS FOR THE ACTION

No public funds or lands are being considered for the action if granted.
D. PHASING AND TIMING OF THE ACTION

The proposed action is a policy change to the General Plan and not a proposal for a specific resort development that would normally involve a phasing schedule. Processing of a General Plan change requires:

- Preparation of General Plan Amendment Application.
- Evaluation and preliminary recommendations by the Department of General Planning.
- Public agency and community review.
- Final recommendations by the Department of General Planning.
- Planning Commission public hearing and recommendations.
- City Council public hearing and decision.
- Review by the Mayor.

The proposed action is expected to receive final review and action prior to July 1987.
PART IV

DESCRIPTION OF THE ENVIRONMENTAL SETTING AND THE PROBABLE IMPACT OF THE PROPOSED ACTION ON THE ENVIRONMENT

The proposed action is an amendment to the General Plan economic policies, and it is not an action that proposes the development of a specific parcel of land for a specific resort project. Without such details, it is not possible in this EIS to determine and address specific impacts and mitigating measures. The discussion which follows, however, is a general description of the environmental setting of the Mokuleia area and an identification of potential impacts and mitigating measures that may or may not be apply to subsequent proposals for specific resort developments in the Mokuleia area.

A. TOPOGRAPHY

Existing Conditions

The area proposed for designation as a Secondary Resort Area generally consists of the following: The area between the shoreline and Farrington Highway are relatively flat with minor variations caused by drainageways and areas of buildup due to windblown sand. The areas mauka of Farrington Highway are relatively flat for about 1/2 mile mauka of the highway and then slope up increasingly until they reach the 400-foot contour of the Waianae mountains.
Potential Impacts and Mitigative Measures

Localized changes in topography will be necessary to accomplish development. These changes may include the following: Building up coastal areas where development is proposed in order to mitigate storm wave and tsunami hazards, grading and construction of drainageways to mitigate flood hazards, cutting and filling in order that roads to be developed are in compliance with good engineering practice and County standards, grading alterations may be made in order to enhance views or comply with provisions of government requirements. The impact of manmade structures or alterations of the landscaping is covered in the visual section of this EIS (Part IV, Section N).

The lack of prominent natural features in the area proposed for Secondary Resort designation will limit the topographical impact of development. Other mitigating measures will include compliance with City & County of Honolulu grading and subdivision ordinances which contain provisions for erosion control during construction. In addition, processing of a Development Plan amendment for any specific resort development will mandate both public and agency input for the development plan approval.
**B. SOILS**

The Mokuleia area is located on the northern coastline of Oahu at the foot of the Waianae range. The Waianae mountain range is believed to have developed in Tertiary time from three rift zones. The lavas that built the mountain generally consist of aa and pahoehoe basalts.

After the volcano became dormant, soil developed from the weathering of the rock surface. Streams carved valleys into the mountain range, and changes in sea level resulted in alluviation of the valley floors and development of fringing coral reefs.

The area is generally overlain by alluvium and colluvium derived from soil materials of the uplands being transported to the lower slopes by water and gravity. Along the shoreline, beach sand can be found. The sand is derived from wind and water deposited material from coral and seashells.

Potential Impacts and Mitigative Measures

This General Plan amendment does not identify a site-specific/project-specific resort proposal. Potential impacts include ensuring that any specific proposal processed as a Development Plan amendment consider soil conditions.

No mitigating measures are required at this time as the General Plan amendment does not identify a site-specific/project-specific resort proposal. Siting of proposed improvements must take into consideration soil conditions. Soil testing prior to construction and the adherence to good engineering practices and City & County Building Codes should mitigate any problems associated with soil stability.

C. WATER RESOURCES AND WATER USAGE

Existing Conditions

In 1981 the Waialua area was designated by the Board of Land and Natural Resources (BLNR) as a water control area. This designation requires that the BLNR approve all requests for expansion of preserved uses or development of new sources. (A preserved use is an existing water use prior to designation of the water control area.) In the case of the wells in the Mokuleia aquifer the existing demand is much less than fifty percent of the sustainable yield which is estimated by BLNR to be 20 MGD.
In February of 1986 the Board of Water Supply prepared an Environmental Assessment for proposed improvements to the Waialua-Kahuku regional water systems. The improvements being proposed include new source developments in the Mokuleia area.

Potential Impacts and Mitigative Measures

The General Plan is not site- or project-specific and therefore specific impacts cannot be determined, however, the following is a potential impact. Water which is currently unused or used for other purposes may be requested by a developer for resort purposes.

The Department of Health is vested with the responsibility to ensure that public water systems in the State are providing water which is in compliance with the State's drinking water regulations known as Chapter 20, Title 11, Administrative Rules, and are in compliance with all other applicable terms and conditions of Chapter 20. A public water system is defined as a system serving 25 or more individuals at least 60 days per year or having a minimum of 15 service connections. If a new water source is developed to supply a proposed resort project, the source and distribution system will be subject to the terms of Section 11-20-29 and Section 11-20-30 of Chapter 20 respectively. Section 11-20-29 of Chapter 20 requires that all new sources of potable water serving public water systems to be approved by the Director of Health prior to their use to serve potable water. Such approval is based primarily upon the submission of an engineering
report which adequately addresses all concerns as set down in Section 11-20-29. The engineering report must be prepared by a registered professional engineer and bear his or her seal upon submittal.

Section 11-20-30 requires that new or substantially new or substantially modified distribution systems be approved by the Director of Health.

Approval authority for Section 30 has been given to the Board of Water Supply for water distribution systems under their jurisdiction.

Specific site and proposal information must be available to make any conclusive statements of water availability or usage, however, BLNR estimates of sustainable yield demonstrates an abundance of water in the area for development.

The wells are within a BLNR Water Control area. BLNR will have an opportunity to conduct a review of all of the relevant facts prior to granting any request for water usage by a developer of a proposed resort development.

While the Mokuleia area is within the Waialua Water Control Area, it is part of a sub-area which has estimated sustainable yields in excess of the preserved and actual uses.
Any new resort development in the area would require a water system developed to Board of Water Supply standards for dedication, therefore ensuring a system developed in accordance with long established proven technologies.

Potential developers must comply with the requirements of Section 11-20-29 and 11-20-30 of Chapter 20, Title 11, Administrative Rules and Regulations. As State law is very explicit in detailing the approval requirements and process for new sources and distribution systems for drinking water, no further mitigating measures are necessary. The developer of a proposed resort project and his engineering consultant must work closely with the Department of Health in meeting the requirements of the law.

D. TSUNAMI/FLOOD HAZARDS

Existing Conditions

The standard used in the United States of America for determining the flood hazard potential of various properties is the Department of Housing and Urban Development's "Flood Insurance Rate Map" (FIRM). These maps were developed by the U.S. Army Corps of Engineers. These maps designate and rate the flood hazards from both rain and wave action. Portions of the area being proposed for designation as a Secondary Resort Area are located within flood hazard areas designated under the FIRM program. The affected areas are shown on Exhibit 7.
Potential Impacts and Mitigative Measures

Development within flood zone areas may pose a risk to both human safety and the safety of improvements.

No mitigating measures are necessary at this time since the General Plan amendment does not identify a site-specific/project-specific resort proposal. However, specific proposals may mitigate these hazards in a number of ways including the following:

1. Additional studies

   a. To determine the base flood elevations and hazard potential of specific sites.

   b. A study identifying the potential hazard from Tsunami and Hurricanes of a specific site.

2. Specific Actions

   A number of specific mitigating measures may be recommended, including:

   --- Providing setbacks from coastal areas subject to wave action.

   --- Raising the grade of the site above base flood elevation.
--- Increasing structural capabilities of foundations or building to withstand projected hazard.

--- Development of various designs to dissipate potential wave action.

3. **Compliance with Ordinances and Laws**

The FIRM program developed by HUD has been incorporated into the City & County of Honolulu's Land Use Ordinance (Article 7.10).

**E. NEARSHORE MARINE ENVIRONMENT**

**Existing Conditions**

Conditions in the nearshore marine environment adjacent to the Mokuleia coastline vary.

**Potential Impacts and Mitigative Measures**

The lack of a site-specific/project-specific resort proposal makes prediction of impacts difficult, however, potential impacts include those due to changes in the amount or character of drainage discharge into the ocean or a change in the location in the discharge.
No mitigating measures are necessary at this time since the General
Plan amendment does not identify a site-specific/project-specific
resort proposal. Specific resort proposals must identify specific
existing conditions as well as impacts of the specific proposal.
Mitigating measures include adequate studies as well as engineering
solutions to potential problems that are identified.

F. COASTAL EROSION

Existing Conditions

The coastal areas proposed for Secondary Resort designation have shown
varying susceptibility to coastal erosion as shown in Beach Changes on
Oahu as Revealed by Aerial Photographs by Dennis Hwang, July 1981.

Potential Impacts and Mitigative Measures

Locating new improvements in areas where shoreline instability has
been recognized in the recent past may subject the improvements to
long-term ocean hazards due to coastal erosion.

No mitigating measures are necessary at this time since the General
Plan amendment does not identify a site-specific/project-specific
resort proposal. There are a number of mitigating measures that can
be taken to minimize the impact of coastal erosion, should any occur.
The first is using adequate setbacks to reduce any problems during the economic life of the structures.

Another method is to artificially stabilize the coast through seawalls or other barriers.

Still another method is to replenish erosion losses by hauling in material. Further, the report on beach changes by Hwang, July '81, indicate significant accretion from time to time along the entire beachfront.

G. POTENTIAL SEA LEVEL CHANGES

Existing Conditions

In response to Senate Resolution 137, 1984, the Department of Planning and Economic Development prepared a report titled "Effects on Hawaii of a Worldwide Rise in Sea Level Induced by the 'Greenhouse Effect'" January 1985. This report indicated that increases in sea level would have a significant impact on the state's shoreline as well as the economic activities if that rise were 4.8 feet or greater. However, no conclusion could be reached as to what the actual level 100 years from now would be.
Potential Impacts and Mitigative Measures

Designation of the Mokuleia area as a Secondary Resort Area will have no impact on the sea levels. However, the location of economic investment in areas impacted by sea level changes is of interest to State and County planners.

Of greater concern to resort development is the usability of public facilities such as the Honolulu Airport and Honolulu Harbor in the event of sea level changes. The economic viability of resort development is dependent on the existence of a tourist industry on Oahu.

At the present time actual changes in sea level cannot be known. Therefore only general caution can be exercised.

In selecting designs and building locations consideration should be given to potential increases in sea level.

H. TERRESTRIAL VERTEBRATES AND VEGETATION

Existing Conditions

The Mokuleia area encompasses a wide variety of land uses including agricultural, residential, recreational and military. In addition there is a variety of land types from coastal to mountainous, thus permitting a variety of terrestrial vertebrates to exist in the area.
The endangered Hawaiian moorhen (Gallinula chloropus sandvicensis) and endangered Hawaiian stilt (Himantopus mexicanus Knudsen) use wetlands within the area affected by the proposed amendment.

The Mokuleia area includes a wide variety of land uses including agricultural, residential, recreational and military. In addition there is a wide variety of growing conditions including coastal, coastal plain and mountainous. Therefore there is a diversity of vegetation at various places within the area.

**Potential Impacts and Mitigative Measures**

The General Plan amendment is not site-specific/project-specific and therefore will have no impact on terrestrial vertebrates. Potential impacts when site-specific or project-specific resorts are proposed include potential impacts from site alteration or from the presence of humans.

Mitigating measures may include studies of specific sites and specific proposals to assess the potential impact on the terrestrial vertebrates. Discussions with federal and state officials to determine mitigating measures and preservation or improvement of specialized habitats may be necessary.
The General Plan is not site-specific or project-specific and therefore will have no identifiable potential impact. Specific proposals for specific sites will have to be reviewed to determine the impact on vegetation in the area. Potential impacts on vegetation include impacts from site alteration as well as increases in the human population. Mitigating measures may include studies of specific sites or proposals to assess the potential impact on the vegetation. Discussions with federal and/or state officials and preservation or improvement of specialized habitats may be necessary.

I. WETLANDS

Existing Conditions

Exhibit 13 shows the existing wetlands areas as provided by the USDI Fish and Wildlife Division. There is only limited information on the use of these wetlands by endangered waterbirds and migratory waterfowl. The Crowbar Ranch pond is listed as a primary habitat in the Hawaiian Waterbirds Recovery Plan (U.S. Fish and Wildlife Service 1983). Mr. Ralph Saito (Division of Forestry and Wildlife, State Department of Land and Natural Resources) reported gallinule, a listed endangered species, in the marsh areas near the existing polo field. Hawaiian stilt, another listed endangered species, have been observed in the wetland inland from the Dillingham Air Field. The use of the other wetlands in this area by endangered waterbirds and migratory waterfowl is not known since access to these sites is limited.
The following is a key to the codes used to describe the wetlands on the attached map:

- **POWE**: palustrine, open water, permanent, excavated.
- **E2US2P**: estuarine, intertidal, unconsolidated shore (sand), irregularly flooded.
- **PEM1C**: palustrine, persistent emergent vegetation, seasonal, excavated.
- **PFO3A**: palustrine, broad-leaved evergreen vegetation, temporary.
- **PFO3C**: palustrine, broad-leaved evergreen vegetation, seasonal.
- **R2OHE**: lower perennial riverine, open water, permanent, excavated.
Potential Impacts and Mitigative Measures

Resort development may impact on the existing wetland areas due to construction improvements or the increase of human activity. Mitigative measures include thorough assessment of specific sites proposed for development and the development of areas in proximity to wetlands in an environmentally sound manner in order to enhance their ability to support existing ecosystems.

J. ARCHAEOLOGICAL

Existing Conditions

There are a number of sites of potential significance located in the Mokuleia area (see Exhibit 14). However, to date no extensive archaeological reconnaissance of the area has been undertaken.

Potential Impacts and Mitigative Measures

A resort project may affect the archaeological resources within the area. An archaeological study will be necessary when a proposal for a specific resort development is processed as a Development Plan amendment. Close and timely coordination with the State Historic Preservation Officer will be necessary where archaeological findings of significance are impacted by a proposed resort project.
K. AGRICULTURE

Existing Conditions

The Hokuleia area is made up of primarily agriculturally designated lands. These lands have various productive capacities and some are currently employed in plantation agriculture (sugar), pasture, and diversified agriculture, and some of the lands are vacant. (See Exhibit 15, Existing Agricultural Activities.)

Proposed Land Evaluation and Site Assessment (LESA) System

The Hawaii State Constitution was revised in 1978 to include the following statements concerning agriculture (Article XI, Section 3):

"The State shall conserve and protect agricultural lands, promote diversified agriculture, increase agricultural self-sufficiency and assure the availability of agriculturally suitable lands. The legislature shall provide standards and criteria to accomplish the foregoing."

"Lands identified by the State as important agricultural lands needed to fulfill the purpose above shall not be reclassified by the State or rezoned by its political subdivisions without meeting the standards and criteria established by the legislature and approved by a two-thirds vote of the body responsible for the reclassification or rezoning action."

The Land Evaluation and Site Assessment (LESA) Commission was assigned the task of identifying and recommending, for adoption by the Legislature, a system to identify Important Agricultural Lands (IAL) and developing procedures and criteria to reclassify land to or from IAL.
designation. The LESA Commission Report and corresponding legislative recommendations were submitted to the 1986 legislature, but were carried over to the next session since no action was taken. Therefore, at this time LESA remains a proposal that has not yet been adopted into law by the State Legislature. Its provisions are still subject to review and change and its final form or adoption is far from certain.

Potential Impacts and Mitigative Measures

The General Plan amendment to designate Mokuleia as a Secondary Resort Area is not site-specific or project-specific and therefore assessment of the potential impact of future proposals is not possible. However, given the large amount of agricultural land in the Mokuleia area and the small amount of land with other designations it is likely that agricultural lands will be involved in a specific resort development. Specific site and project proposals will have to be assessed based on a number of criteria including size, suitability of the site for agricultural use, soil types, productivity ratings and availability of irrigation water. Given the conditions facing Hawaiian agriculture outlined below it is highly doubtful that resort development of a scale comparable with existing or proposed developments in areas on Oahu designated as secondary resorts would adversely impact either Oahu's or the State's agricultural industry.
This preliminary finding is derived from a comparison of the modest amount of prime agricultural land required for diversified agriculture versus the very large supply of prime agricultural land that is available for profitable crops.

To increase Hawaii's self-sufficiency in produce crops to a realistic level, and to accommodate resident-plus-visitor population growth to the year 2000, a surprisingly small amount of land is required—less than 1,200 acres.

A large market exists for feed crops, but most of these crops are not commercially feasible for Hawaii. A possible exception is corn silage to feed cattle in feedlots. However, less than 2,600 acres would be needed statewide to feed all cattle in feedlots, even with an increase in cattle operations. Experiments with corn silage and other feed crops have been performed, but returns per acre have been low.

Regarding export crops, papaya is a possibility being explored for Oahu lands, although the acreage requirement for increased production is relatively small; total statewide plantings amount to a little over 2,000 acres, primarily on the Big Island. Macadamia nuts offer the potential of absorbing a significant amount of agricultural land, but increasing overseas competition indicates that this is a high-risk venture unable to compete in those areas where other economic activities offer higher land rents. Other existing export crops are not agronomically suited for the Mokuleia area and/or require very little
land. Finally, efforts in Hawaii for over a century indicate that it is extremely difficult to identify new export crops and develop them into new and profitable industries.

Livestock operations are another possibility, but the returns are low from cattle grazing; the trends are not favorable for increased dairy, egg, and swine and pork operations; and little land is required for poultry operations.

Problems with freshwater prawns include low profitability, a saturated local market, and an export market of doubtful potential. Other potential freshwater aquaculture activities suffer from low prices, stiff competition from the mainland, a small local market, unsuitable climate, and/or other problems.

The potential for brackish and saltwater aquaculture, particularly shrimp, is regarded as more promising. However, brackish and saltwater aquaculture is still in a research-and-development stage, with profitability for large-scale operations yet to be proven. Also, various land use policies and regulations make profitability difficult to achieve, and limit development. Finally, concerns over salt contamination of prime agricultural lands and the groundwater supply argue against brackish and saltwater aquaculture for most Mokuleia lands.
Increased demand for agricultural land in Hawaii as a result of land shortages on the mainland should not be anticipated, since such mainland land shortages are not expected. On the mainland, as in Hawaii, there is a large supply of fallow agricultural lands. Furthermore, this supply is expected to increase given genetic engineering advances which promise higher yields for crops, increased resistance to diseases and pests, and increased tolerance to variations in climate.

In contrast to this demand, the supply of prime agricultural lands available to profitable crops is enormous. Since 1970 over 42,000 acres of land have been freed from sugar production (about 8,600 acres on Oahu and 33,600 on the Neighbor Islands). Some of the land freed from sugar and pineapple production has or will be converted to urban, diversified agriculture, and aquaculture uses. Also, some of the land freed from pineapple use on Oahu was converted to sugar production. Making allowances for the various conversions, the bulk of the 80,000 acres which has been freed from plantation agriculture remains fallow or is in pasture or some other low-profit holding operation awaiting discovery of profitable crops. (Even though considerable agricultural land is available, it should be noted that the supply of parcels for small-scale farmers is limited. This is partially because added expense for improvements makes it uneconomical for large land owners to subdivide their lands into small agricultural lots.)

The supply of fallow prime agricultural land probably will increase given the unfavorable outlook for the sugar industry. Nine of the
thirteen sugar plantations in Hawaii are unprofitable and the Federal price support for sugar is scheduled to remain unchanged until at least 1991. In fact, some unprofitable mills remain in operation temporarily only because of lease and/or energy agreements.

Furthermore, some plantations continue as land-holding operations awaiting discovery of profitable replacement crops.

Many of the lands freed or to be freed from sugar and pineapple production have excellent agricultural qualities and climatic conditions, and are well-suited for crop and aquaculture production. Also, water is available for most of these lands, particularly lands freed from sugar production.

Finally, some additional land has been made available to diversified agriculture in government-sponsored agricultural parks throughout the State.

In summary, the amount of prime agriculture land required to accommodate growth of diversified agriculture is very small compared to the huge supply that is available for profitable crops.

Depending on where a site- or project-specific resort development proposal is located, lands State classified as Agriculture may be involved. However, before such lands could be used for resort purposes, a State land use boundary change must be approved by the
State Land Use Commission. In considering a land use boundary change from Agriculture to Urban, it will be necessary to conduct an agricultural impact analysis on the site-specific location for the proposed resort development. This analysis would include necessary mitigating measures. A similar analysis would also be performed when a site-specific/project-specific resort proposal is processed as a Development Plan amendment.

L. NOISE

Existing Conditions

The Mokuleia area is primarily an agricultural and recreational area with some residential uses. It also contains the Dillingham Airfield. Noise existing in the area can be traced to one of the following land uses, activities, or environmental factors.

* Surf
* Motor vehicle traffic on Farrington Highway
* Aircraft (see attached Exhibit 16)
* Wind in the trees
* Birds and people activities
* Agricultural activities
EXHIBIT 16
NOISE LEVEL CONTOURS
Source: Darby & Asso. 1986

DUSK NOISE LEVEL \( L_{DA} \) CONTOURS-DILLINGHAM AIRFIELD-
TRADEWIND FLIGHT PATTERN - CIVILIAN AIRCRAFT - 1995

DUSK NOISE LEVEL \( L_{DA} \) CONTOURS-DILLINGHAM AIRFIELD-
KONA FLIGHT PATTERN - CIVILIAN AIRCRAFT - 1995
NOTE: NOISE ZONE 3 (GREATER THAN 75 Ldn)
NOISE ZONE 2 (65 to 75 Ldn)
NOISE ZONE 1 (LESS THAN 65 Ldn)

ZONE 1

ZONE 2

ZONE 3

ZONE 4

- DAY-NIGHT NOISE LEVEL (Ldn) CONTOURS PROJECTED FOR SPORADIC MILITARY EXERCISES INVOLVING HELICOPTER - DILLINGHAM AIRFIELD
Potential Impacts and Mitigative Measures

The General Plan is not site-specific/project-specific and therefore it is not possible to determine specific potential impacts. When specific proposals are developed it is likely that potential noise impacts will be of the following types: short-term impacts due to construction, i.e., noise from construction equipment; long-term impacts will be due to increases in population and/or the impact of existing noise sources on proposed development.

No mitigating measures are necessary at this time since the General Plan amendment is not site-specific or project-specific. Mitigation of potential impacts of noise from future development proposals could be handled in the following ways: noise studies, to determine the impact of a specific proposal at a specific site; compliance with State Health Department rules and City and County ordinances designed to minimize noise impacts from construction; design guidelines and buffering of development to prevent existing noise sources from adversely impacting proposed development through such means as setbacks and landscaping.
M. AIR QUALITY

Existing Conditions

Present air quality in the Mokuleia area is estimated to be very good since there are no major contributing sources of air pollutant emissions other than vehicles traveling on nearby roadways and isolated sugar cane fires.

Potential Impacts and Mitigative Measures

The General Plan is not site-specific or project-specific and therefore impacts cannot be specifically identified, however, if resort development does occur in the future the following impacts are likely. Except for dust emissions during the construction phase of the development, no significant short-term direct air quality impacts are expected. Adequate control measures exist to limit the impact of windblown dust, but special care will have to be exerted to ensure that previously developed residential areas are not subjected to excessive levels of particulate pollution from construction activities.

Indirect air quality impacts are expected to result from new demands for electrical energy. This impact is most likely to occur in the vicinity of existing power plants such as the Kahe Plant on the Waianae coast where increased levels of particulates and sulfur dioxide can be expected. Maximum use of solar energy designs in
project development can at least partially mitigate the magnitude of this impact. New methods of generating electrical power such as wind or ocean thermal energy conversion may eventually also play a mitigative role in this regard.

As previously indicated the only direct short-term adverse air quality impact that a project-specific development is likely to create is the emission of fugitive dust during construction. State of Hawaii regulations stipulate the control measures that are to be employed to reduce this type of emissions. Primary control consists of wetting down loose soil areas. An effective watering program can reduce particulate emission levels from construction sites by as much as 50 percent. Other control measures include good housekeeping on the job site and pavement or landscaping of bare soil areas as quickly as possible.

Once completed, a resort development in the Mokuleia area is likely to have little direct impact on the air quality of the surrounding region.

Indirect long-term impacts in the form of increased air pollutant emissions from power plants serving new development in the project area can be mitigated somewhat by planning and implementing solar energy design features to the maximum extent possible.

Tall, dense vegetation can provide some screening from larger airborne particulates generated along roadways and near construction areas.
N. Visual

Existing Conditions

Scenic resources in the Mokuleia area include: the slopes and peaks of the Waianae Range mauka of Farrington Highway, and sporadic coastal views (from Farrington Highway most of the coastal views are restricted by topography, natural growth and houses). In the vicinity of the polo field, equestrian activities are in view of passing motorists. Sugar fields, cattle and horse grazing are also a frequent sight on either side of Farrington Highway.

Potential Impacts and Mitigative Measures

A specific site and development proposal is necessary to assess the potential visual impacts. This will occur when a proposal to amend the Development Plan is processed and evaluated in terms of its consistency with the urban design principles and controls established for the area. In general, visual impacts can be mitigated by height considerations, setbacks, design features, and landscaping.
0. Socio-Economic Characteristics

1. Population

Existing Conditions

The area proposed for Secondary Resort designation is located in the U.S. Census Bureau's "Waialua Division", consisting of census tracts 99.01, 99.02, and 100. (To avoid confusion with the town of Waialua, this area will be referred to as the "North Shore".) Other possibly affected nearby areas include the Koolauoa division (tracts 101, 102.01, and 102.02) and the Wahiawa division (tracts 90 through 95.05). Below Wahiawa, the communities of Waipahu and Mililani (tracts 87.01 through 89.03) represent possible labor supply sources, although it is not anticipated that these areas would be otherwise impacted by resort development in the Hokulea area.

Exhibit 17 shows the boundaries of these various portions of the overall Study Area. Exhibit 18 shows differences between the census areas and the City's Development Plan areas for the North Shore and Koolauoa. In the Development Plan Areas, the areas known as Sunset Beach, Waimea, and Pupukea (with a total 1980 population of about 3,200) are considered part of the "North Shore," although they are in the Koolauoa Census Division.
EXHIBIT 18
COMMUNITIES IN PRIMARY STUDY AREA

PORTION OF KOOLAUOA CENSUS DIVISION
THAT IS IN THE NORTH SHORE
DEVELOPMENT PLAN AREA

NORTH SHORE
CENSUS DIVISION/
DEVELOPMENT PLAN AREA

KOOLAUOA
CENSUS DIVISION/
DEVELOPMENT
PLAN AREA

MOKULEIA
WAIALUA
BEACH
HALEIWA
WAIALUA

99.01

98

95.05
95.04

95.01

90

102.02

102.01

101

100

103.03
(However, census figures to be quoted here for the North Shore would exclude these areas.) Thus, the combined North Shore/Koolaulea Development Plan Areas are equivalent to the combined North Shore/Koolaulea census divisions. Additionally, the combined Wahiawa and Mililani/Waipahu areas are approximately equal to the City's "Central Oahu" Development Plan Area.

As of the 1980 U.S. Census, the North Shore's population was 9,849. Major ethnic groups were Filipino (32%) and Caucasian (31%). The median age of 26.3 years was somewhat lower than the islandwide median, although the proportion of senior citizens on the North Shore exceeded the islandwide proportion. Average educational levels on the North Shore are behind those of the overall Oahu population. Approximately two-thirds of the North Shore population lived in two communities—the sugar plantation town of Waialua (population 4,051, nearly one-half Filipino) or Haleiwa (population 2,412, with a cosmopolitan ethnic composition dominated by Caucasians, Filipinos, and Hawaiians).

Also as of the 1980 census, the Koolaulea Division population was 14,195 (predominantly Caucasian and Hawaiian); the Wahiawa Division population was 41,562 (45% Caucasian, due to the large military presence in the area); and the combined Mililani/Waipahu population was about 50,500.
The North Shore, Koolauloa, and Wahiawa populations are all characterized by significant poverty problems. In 1980, compared to islandwide figures, median family incomes were lower and proportions of the population below official "poverty level" were higher. Proportionately more people were renters rather than owner-occupants, and larger percentages of median family income were required to pay rental costs than elsewhere on the island.

The City's General Plan population guidelines say the year 2005 population for the combined North Shore/Koolauloa Development Plan Areas should be held to a figure between 2.9% and 3.3% of total islandwide population, which is now estimated by the State as 954,500. This means a combined North Shore/Koolauloa population between 27,700 and 31,500 in 2005.

However, if the 30-year historical growth rates for these areas were to continue, the combined year 2005 population would be significantly higher than this by the year 2005—between 40,000 and 40,500 persons. This implies that the current City policies of restricting residential land supply to the General Plan target may result in a situation where housing demand will soon exceed supply. Thus, even without resort development in Mokuleia, significant population and housing pressures are expected within the next several decades.
For the Mokuleia community along Farrington Highway, certain population changes are also expected even without future resort development. Rising prices for beachfront residential land throughout Oahu could ultimately result in small pockets of currently cheap rental housing being phased out, to be replaced by tenants or owner-occupants better able to afford the rising land values and property taxes. Additionally, a few homes toward the Kaena Point side of Farrington Highway are on land designated "Preservation" and cannot be rebuilt if destroyed or badly deteriorated.

**Potential Impacts and Mitigative Measures**

The General Plan amendment is not site- or project-specific and therefore population impacts and mitigating measures cannot be determined. However, one likely result of increased development is increased population. The potential impacts of the increased population on traffic, public services and recreation are found in Section P, Infrastructure and Public Service.

2. **Economic Development**

**Existing Conditions**

The primary economic activities undertaken in the Mokuleia area are sugar cane cultivation, cattle ranching and equestrian activities.
For the overall North Shore area, principal current economic activities include the Waialua Sugar Plantation's sugarcane operations and retail/commercial activities in Haleiwa. As with all sugarcane operations in Hawaii, the Waialua plantation's future is uncertain, and the company has reduced its payroll substantially in recent years. Haleiwa retail activities have become increasingly oriented to drive-through visitor traffic, although the nearest major visitor accommodations are at the Turtle Bay Hilton in Koolauloa. Other Koolauloa economic activities are also primarily tourist-oriented, including the Polynesian Cultural Center and Mormon Temple in Laie as well as several restaurants and arts and crafts shops further south. In Wahiawa, the principal economic activities include pineapple, retail/commercial activities, and other support services for the large nearby military bases (Wheeler Air Force Base and the Army's Schofield Barracks).

On the North Shore, the overall level of economic activity at present is quite limited. This is reflected in certain patterns to be detailed in the following section on "Employment," which will discuss the low number of jobs relative to the labor force, low labor force participation, unemployment, and commuting outside the area for employment.
Potential Impacts and Mitigative Measures

Designation of Mokuleia as a Secondary Resort Area in the General Plan is not site- or project-specific, therefore no impacts will be generated and no mitigating measures will be necessary. However, a Secondary Resort designation will allow specific proposals and sites to be assessed under the Development Plan review process. Although it is not possible to identify the extent of the impacts from specific projects or sites the following generalized impacts are likely results of resort development proposals.

Expenditures

A Mokuleia resort development will generate direct, indirect and induced expenditures in Hawaii from the visitors and residents. This group will make direct expenditures for food, accommodations, recreational activities and other goods and services. These direct expenditures will, in turn, generate indirect and induced expenditures throughout the State through multiplier effects.

Resident Income

A Mokuleia resort development could be expected to have a significant impact on personal and household income for residents of the island and the State. Mokuleia would generate resident income
through employee wages, salaries and fringe benefits and as income to proprietors.

Revenues

A resort development at Mokuleia would bring tax revenues to the County and State governments. County government revenues would be in the form of real property taxes on the new facilities. Revenues to the State government would be principally of unemployment taxes, excise taxes, gross income tax and personal income taxes.

3. Employment

Existing Conditions

Employment in the Mokuleia area is minimal (less than 100 persons).

The major North Shore employer is the Waialua Sugar Company with about 460 employees. According to U.S. Census figures from 1980 (when the plantation payroll was somewhat larger), there were 864 jobs in the Waialua/Mokuleia census tract 99.01; of these about two-thirds were in agricultural field operations or sugar-mill manufacturing jobs. For census tracts 99.02 and 100 (including Haleiwa and the rest of the North Shore), the job count was 1,167, and nearly one-half of these were in either retail trade or professional services. Thus, the nature of employment is very
different in Waialua/Honolulu from the rest of the North Shore area.

In areas adjacent to the North Shore, the major employers are tourism activities in Koolau and military bases or pineapple operations around Wahiawa. Below Wahiawa, the communities of Mililani and Waipahu as of 1980 contained about 9,300 jobs, many of them in plantation agriculture, neighborhood retail/commercial centers, and some military activities. In the other direction, the Polynesian Cultural Center in Laie provides about 1,000 jobs (many of them for students or part-time workers), while the Turtle Bay Hilton at Kualoa now employs some 550 persons.

The North Shore unemployment rate has approximately matched the islandwide rate in the 1980's, but the labor force participation rate—particularly among women—has been significantly lower, indicating possible hidden unemployment. Additionally, census data indicate many North Shore residents work less than full-time. Compared to the islandwide population, North Shore residents have lower educational levels and a younger median age, both of which suggest fewer job-related skills.

As of 1980, the North Shore civilian labor force totalled 3,837 (compared to the 2,031 jobs in the area), and 27% of employed workers had to commute 45 minutes or more to workplaces far outside the area. Compared to islandwide employment patterns,
North Shore workers were more concentrated in blue-collar occupations and less in professional or administrative jobs.

In other nearby areas, the 1980 civilian labor force totalled 6,115 in Koolau County; 9,701 in the Wahiawa census division; and 25,494 in the Mililani/Waipahu area. Unemployment in all these areas has exceeded the islandwide rate. The rate has been particularly high in Wahiawa, which also has a low civilian participation rate. Military dependents in the Wahiawa area encounter substantial difficulties in finding employment, both because of distance from Honolulu job centers and because their stays in Hawaii are generally limited to three years.

Potential Impacts and Mitigative Measures

The General Plan amendment is not site- or project-specific. Therefore, there will be no impacts or, consequently, no mitigating measures necessary. There is a wide range of development sites or proposals which could be proposed and processed as an amendment to the North Shore Development Plan. The following employment impacts might be expected from resort developments.

Employment

Resort development at Mokuleia is likely to generate employment during the construction of new facilities and long-term employment...
in the operation and maintenance of those facilities. Similar to expenditures, employment effects may also be classified as being direct, indirect or induced.

Construction Employment

Direct construction employment is that which would be supported directly by the construction of the various facilities at Mokuleia.

Operational Employment

The majority of these jobs would be associated with the hotel operations at Mokuleia.

Through indirect and induced effects, the direct operational positions created would generate additional employment elsewhere in the State.

Labor Demand and Supply

Without resort development in Mokuleia, it is estimated that the North Shore will have an increasing excess of workers over available jobs. This suggests progressively higher rates of unemployment and/or commuting to other places for jobs. Resort development in Mokuleia is likely to result in an increase in jobs, mitigating against a projected shortfall in jobs in the area.
4. **Lifestyle**

**Existing Conditions**

Mokuleia residents along Farrington Highway are a mixture of (1) fairly affluent persons (many of these part-time rather than full-time) whose households are "country retreats" and (2) low- or middle-income longtime residents (including many full-time renters) whose rural lifestyles are based on proximity to the ocean. A few of these are known to depend to some extent on the ocean for subsistence, although exact numbers are unavailable. Because of rising property values and taxes for beachfront land, it may be increasingly difficult for such individuals to retain this lifestyle in Mokuleia as time goes by.

The wider North Shore area is also generally "rural" in character and lifestyle. Physically, the area is characterized by extensive agricultural (primarily sugarcane) uses; numerous recreational activities; low-density residential areas, with a few pockets of higher-density apartments and townhouses in Mokuleia, Waialua Beach, and Haleiwa; and low-density commercial areas in Haleiwa and, to a lesser extent, Waialua.

Socially, there are a variety of very different types of "rural" lifestyles on the North Shore. The town of Waialua—which contained 41% of the North Shore's 1980 population—is a traditional
plantation community with a strong communal orientation and a power structure tied to the plantation and/or the labor union. Other parts of the North Shore are more ruggedly individualistic. The North Shore (including the Sunset Beach area) is one of the world’s premiere surfing locations, and many local and Mainland youths are attracted to the area for its water recreation potential; this subculture is fairly transient, but some of its members have settled in to become longtime community leaders. Still other forms of “rural” lifestyles on the North Shore include scattered small farms, retirees, and professional-level residents who commute daily to Honolulu.

Adjacent to the North Shore, Koolauola residents represent a similar diversity of “rural” lifestyles, but the town of Wahiawa is characterized more by an urban lifestyle and the homogenous barracks and apartment housing for the military personnel and dependents.

**Potential Impacts and Mitigative Measures**

The proposed General Plan amendment is not site-specific or project-specific and thus no impacts or mitigating measures can be identified. However, the following generalized potential impacts can be anticipated.
In Hōkūle'ia, resort development may accelerate increases in property values, suggesting more rapid turnover of properties (with profits to present owners).

For the community of Waialua, resort development could be a vehicle for preserving at least some of the present social order and "sense of place" if the plantation suffers further reverses or eventual shutdown. This is a speculative but highly significant impact, in that it stands for the preservation of a community now home to roughly 40% of the North Shore population.

For the North Shore as a whole, other lifestyle impacts may include expanded public services and/or private amenities due to a larger de facto population base; increased traffic; potential for further visitor-oriented commercial development in Haleiwa; added impetus for other forms of urbanization (all subject to further governmental land use decisions); increased housing pressure; and an expanded visitor population.

Resort impacts can be expected to be of a dual and opposing nature. On the one hand, the availability of jobs will further increase housing pressures and associated social stress. On the other hand, without substantial employment opportunities, less affluent current residents may be expected to bear most of these social costs, whereas resort employment (combined with the advantage of already possessing housing within the area) may
enable them to cope with anticipated stresses much more adequately than would be the case if the regional economy remains depressed.

Possible job training programs oriented toward already-housed local residents would represent a potential mitigation of increased housing pressure and associated stress.

Another type of social stress is crime. Increased population normally results in increased crime rates due to more opportunities for crime. A recent study of local resort areas concluded that some relationship between tourism and crime does appear to exist, but in a variety of minor and often indirect ways. Relatively little crime impact is usually observed at resort destinations themselves or in nearby residential communities, but there are often greatly increased problems with petty thefts from visitors at beach parks or other tourist attractions. Perpetrators are often juveniles, and delinquency rates have increased after resort development in other rural areas. Such problems are more acute in areas with "street scenes" such as Kailua-Kona, Lahaina, or Waikiki.

Most Mokuleia resident complaints about crime now involve illegal firearms use (e.g., target practice) in the Kaena Point area or illegal marijuana growing in the mauka areas. In both cases, the increased de facto population caused by the project may be expected ultimately to reduce these illegal activities. Mitigations
would include strong resort security. For the Kaena Point area, strong warnings to Mokuleia guests of the area's remoteness and poor roads should dissuade most people from exploring the region and thus protect them from harassment.

5. Low/Moderate and Employee Housing

Existing Conditions

The availability of low/moderate and employee housing is a concern of both the State and City governments. The Hawaii State Plan and City and County General Plan both express a desire to encourage the availability of low/moderate and employee housing. It is the applicant's belief that the concern is not unique to the Mokuleia area and that any potential job center located on the island of Oahu would have some resultant impact on the local housing market.

Impacts and Mitigating Measures

Potential impacts of resort development include increased rents, increased demand and pressure to develop additional housing units. As resort development will create a wide range of jobs and income levels, it is likely to generate a need for employee housing units. Mitigating measures include the possibility of opportunity to developing needed housing in conjunction with a proposed development. In addition, to the extent that area residents who
are currently unemployed or underemployed take resort jobs, there is no impact on the housing. Furthermore, the Mokuleia area is in close commuting distance of the population centers of Central Oahu.

P. Infrastructure and Public Services

1. Traffic and Roads

(Prepared by Parsons Brinckerhoff Quaid and Douglas)

Existing Conditions

Farrington Highway, a two-lane undivided State highway, provides access into the Mokuleia area. It serves traffic in both the westbound and eastbound directions and generally runs through residential communities and cane fields along the coastline. Farrington Highway is on level terrain and pavement width varies from 20 to 22 feet. Typically, the highway has narrow shoulders.

In Waialua, the highway pavement becomes wider with various cross streets and driveways entering the highway. The cross streets provide access into the Waialua community, and connections into the neighboring Haleiwa town are available from the makai side. At Thomson Corner, Farrington Highway connects to Kaukonahua Road. In the southeasterly direction, Kaukonahua Road provides access to Wahiawa, and connects to Kunia Road, Kamehameha Highway, and the H-2 Freeway via Wilikina Drive to provide the highway service for trips between Mokuleia and Central and Leeward Oahu, including central Honolulu.
From Thooson Corner, Kaukonahua Road also proceeds in a northerly direction, connecting to Kamehameha Highway at Weed Circle, a traffic rotary which also serves Waialua Beach Road. From here, traffic can continue toward Wahiawa and Central Oahu, Haleiwa and other North Shore Communities, Windward Oahu, or back into Waialua.

Traffic volumes are generally well below capacities in this area, except for some congestion on Kamehameha Highway from Haleiwa through the North Shore area during weekend afternoons. Within Haleiwa, the numerous driveways and roadside parking often create stop-and-go conditions on weekends. Historically, the growth in traffic on the North Shore seems to be more related to increases in islandwide population and visitation, rather than development within the area.

In the Mokuleia-to-Waialua area, existing traffic conditions reflect the existing agricultural uses and low density development of the area. Weekend traffic is highest, especially during summer months when polo matches and other recreational activities in Mokuleia attract more people into the area. Even during these times, traffic on Farrington Highway flows well with little delays.

Traffic counts were taken by the State Highways Division in 1985 at two locations on Farrington Highway. Although these counts were taken on weekdays, they provide an indication of the existing
traffic conditions in the area. At Kapalau Stream in Mokuleia, a daily two-way volume of just over 1,300 vehicles was recorded. Historic count data show that daily volumes have remained at the same level since 1982. The highest hourly volume, 134 vehicles per hour (VPH), was recorded between 12:15 and 1:15 PM. Analysis of the count data indicates good operating condition, with minimal delays being experienced by users; the volume was approximately six percent of the existing highway's capacity.

In the Waialua area, traffic counts at the west leg of Thomson Corner were used in the analysis of the two-lane Farrington Highway. As was the case in Mokuleia, the daily volume of 6,200 vehicles (two-way) indicates that no increase has occurred since 1982. The highest hourly traffic volume occurs in the morning, between 7:00 and 8:00 AM, with a volume of 631 VPH. Peak afternoon volume, 580 VPH, was recorded between 3:45 and 4:45 PM. The analysis indicates that the volumes are sufficiently high to prevent passing on the two-lane highway, which could cause some delays; existing volume-to-capacity ratios, however, are less than thirty percent in either case.

Potential Impacts and Mitigative Measures

An increase in traffic along Farrington Highway can be expected because of resort development at Mokuleia. The amount of
additional traffic, its characteristics and impact to the area, and the need for roadway improvements will depend on the location and scope of a resort development. Since the General Plan amendment does not specify the location or other parameters of resort development, traffic impacts and mitigating measures cannot be addressed at this time.

The potential impacts of resort development, including the identification of mitigating measures, will be addressed when a resort proposal specifying location, number and type of units, extent of related development, and other factors is processed as an amendment to the North Shore Development Plan.

2. Recreational Resources

Existing Conditions

In the Mokuleia area private resources include equestrian activities (polo and other facilities at the Crowbar Ranch stables) and camping at Camp Mokuleia.

Other recreational facilities in Mokuleia include the Mokuleia Army Beach (for military personnel) and the City's 12-acre Mokuleia Beach Park, which is the only developed facility in the Mokuleia area open to the general public free of charge. City Parks Department personnel report that Mokuleia Beach Park is in
little demand for camping permits (limited to 15 parties at any one time) most of the year. However, its remoteness makes it a popular camping area on three-day holiday weekends for urban dwellers seeking an escape from city life.

Outside Mokuleia, the North Shore has numerous public or private beach parks serving not only area residents but also the Oahu general public at large (particularly on weekends). The North Shore is one of Hawaii's best surfing areas, although waters are often rough. For the Waialua community, Puuiki Beach Park (privately owned by the Waialua Sugar Company) off Waialua Beach Road serves important social and recreational functions, such as youth sports activities and community group picnics.

Potential Impacts and Mitigative Measures

The General Plan amendment is not site- or project-specific and as such will not have any specific impacts on recreational resources. No mitigation measures are required for the same reasons. Potential impacts of resort development in the area include the addition of new resort oriented recreational facilities as well as increased use of existing recreational facilities by resort guests. Specific resort proposals will have to be assessed for their individual impacts.
3. Water Distribution

Existing Conditions

The Mokuleia area is currently served by both public and private water systems.

In February of 1986 the Board of Water Supply prepared an Environmental Assessment for proposed improvements to the Waialua-Kahuku regional water systems. The improvements being proposed include new source developments in the Mokuleia area.

Potential Impacts and Mitigative Measures

The General Plan amendment is not site- or project-specific and therefore the specific impacts on existing sources and distribution systems are unknown. However, given the nature of existing public and private water systems in the area it is anticipated that resort proposals would include the development of new or expanded water systems including new sources and distribution.

The Department of Health is vested with the responsibility to ensure that public water systems in the State are providing water which is in compliance with the State's drinking water regulations known as Chapter 20, Title 11, Administrative Rules, and are in
compliance with all other applicable terms and conditions of
Chapter 20. A public water system is defined as a system serving
25 or more individuals at least 60 days per year or having a mini-
imum of 15 service connections. If a new water source is developed
to supply a resort development, the source and distribution system
will be subject to the terms of Section 11-20-29 and Section
11-20-30 of Chapter 20 respectively. Section 11-20-29 of Chapter
20 requires that all new sources of potable water serving public
water systems to be approved by the Director of Health prior to
their use to serve potable water. Such approval is based
primarily upon the submission of an engineering report which
adequately addresses all concerns as set down in Section
11-20-29. The engineering report must be prepared by a registered
professional engineer and bear his or her seal upon submittal.

Section 11-20-30 requires that new or substantially new or
substantially modified distribution systems be approved by the
Director of Health.

Approval authority for Section 30 has been given to the Board of
Water Supply for water distribution systems under their jurisdic-
tion.

Although no mitigating measures are required at this time, ques-
tions of water source and development will have to be assessed
when a specific proposal is processed as a Development Plan
amendment. The developer must comply with the requirements of Sections 11-20-29 and 11-20-30 of Chapter 20, Title 11, Administrative Rules and Regulations. As State law is very explicit in detailing the approval requirements and process for new sources and distribution systems for drinking water, no further mitigating measures are necessary.

4. Sewage Disposal

Existing Conditions

Existing sewage in the area is disposed of in cesspools.

Potential Impacts and Mitigative Measures

A new sewage disposal system will have to be developed to accommodate the sewage generated by any proposal for resort development, regardless of its location in the area.

The City's proposed wastewater treatment plant (WWTP) serving the Waialua and Haleiwa sewage district is planned not far from the Kamananui boundary of the secondary resort area, and mauka of the site designated in the Facilities Plan of the North Shore Development Plan. Construction of the treatment and disposal facilities has been tentatively scheduled in 1990.
The proposed WWTP does not presently have any provisions to serve a secondary resort area since there are no such designations on the General Plan's Land Use Map.

If a wastewater treatment plant is constructed in conjunction with a proposed resort area and dedicated to the City and County for operation and maintenance, it will have to be built according to City standards. Effluent disposal should be compatible to the proposed Facilities Plans and water quality management plans for the drainage area.

Short-term impacts would include the construction related impacts of noise, dust, and traffic delays created by construction of the sewerage facilities. Long-term impacts would involve the sewage treatment plant (STP) component of the system, including visual impact of the plant, potential odor from the plant, noise from plant operations, necessity to dispose of treated effluent and sludge generated by the plant.

Short-term impacts from construction could be mitigated by complying with Department of Health regulations regarding construction noise, and adhering to City and County ordinances relating to grading and building, which contain provisions mitigating against noise and dust.
Long-term impacts from plant operations could be minimized by careful site selection. If the plant is located close to a proposed resort development, it could impact adversely on the operations of a resort project, especially if the resort project is located downwind from the plant. If a proposed resort project is upwind from the plant's location, various mitigating measures are available such as visual and noise barriers, including walls, landscaping and buffering, depending on the closeness of the plant in relationship to the proposed resort development. Any odor problems in this situation could be mitigated by appropriate monitoring, sophisticated instrumentation, and proper management.

Effluent disposal location and method will be determined by the Department of Health, the Department of Public Works, and the Board of Water Supply based on geological information and engineering reports. Any sewer system design and construction will be subject to review by a number of concerned government agencies. Also, the location of the plant will be subject to public review through the development plan process.

5. **Solid Waste**

**Existing Conditions**

The City provides residential collection in the area and other land uses are served by private collection companies.
Potential Impacts and Mitigative Measures

The General Plan amendment is not site- or project-specific. Actual impacts on solid waste require project details. However, new resort development will result in an increase of solid waste. It is likely that current or other services could be expanded to meet this increased need.

6. Drainage

Existing Conditions

The Mokuleia area consists of a coastal plain and foothills which terminate in the Waianae Mountains. Runoff flows from the higher elevations to the lower elevations and is discharged into the ocean. Some of the waters pond in low lying areas and over time percolate into the ground or evaporate. There are numerous natural drainageways in the area as well as a number of public and private drainage courses and drainage improvements.

Potential Impacts and Mitigative Measures

The General Plan amendment is not site- or project-specific and therefore actual impacts cannot be determined. Impacts are those which generally occur in the implementation of drainage improvements. Anticipated impacts should be an improvement in the
drainage throughout the project area, a lessening of particulate matter discharged into the ocean during periods of storm runoff, and the visual impact of altered topography due to drainage improvements.

Drainage improvements will be developed to City & County standards to ensure that adequate and appropriate improvements are made. Construction activities impacts will comply with Department of Health Noise Requirements as well as County Grading Ordinances. Protective measures would be employed to mitigate dust and erosion concerns.

Visual impacts of drainage improvements can be mitigated by design criteria which include landscaping requirements, setbacks as well as material and texturing.

7. Electric and Telephone Services

Existing Conditions

Power and telephone service to the area is currently supplied by overhead lines along Farrington Highway. Power to these lines is supplied by the Waialua Substation which has limited available capacity to serve new development.
Potential Impacts and Mitigative Measures

Improvements would be needed to serve new developments.
Sufficient lead time would be available for the utility company to respond to specific development proposals and provide adequate service for new developments.

8. Public Access and Parking

Existing Conditions

Regional public accesses to the beaches are located along the shoreline at the Mokuleia Beach Park.

Potential Impacts and Mitigative Measures

Public accesses to the recreational resources of the area are likely to be improved; however, these improvements cannot be determined at this time, but will depend on the location and specific resort proposals that may be processed as amendments to the Development Plan. Recent approvals of resort projects at West Beach and Kailua indicate substantial public beach access benefits will be a part of future resort developments.
9. Fire Protection

Existing Conditions

Currently fire protection is provided to the region as follows:

<table>
<thead>
<tr>
<th>Station/Company</th>
<th>Distance</th>
<th>Response Time</th>
<th>Personnel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waialua, Engine 14</td>
<td>7.3 miles</td>
<td>10 minutes</td>
<td>5</td>
</tr>
<tr>
<td>Wahiawa, Engine 16</td>
<td>11.0 miles</td>
<td>17 minutes</td>
<td>5</td>
</tr>
<tr>
<td>Waipahu, Engine 12</td>
<td>21.0 miles</td>
<td>40 minutes</td>
<td>6</td>
</tr>
</tbody>
</table>

Two engines and one ladder is the standard dispatch for all reported structure fires outside the Waikiki and metropolitan areas.

Current Insurance Service Office (ISO) guidelines recommend a standard response distance of not more than four miles for engine and ladder companies, and a ladder company may not be required where there are less than five buildings of three or more stories. A response time of three to five minutes is acceptable.

Potential Impacts and Mitigative Measures

Fire facility and/or service requirements may require improvements. However, the extent of the improvements cannot be determined at this time, but must be based and measured against the needs generated by a specific resort proposal that may be processed as a Development Plan amendment. In the past, fire
services have been upgraded to meet community needs. Recently, the Fire Department has sought assistance from developers in providing appropriate locations for fire protection facilities.

Lines with adequate fire flow capacity and fire hydrants are a requirement of today's water systems. The locations of fire hydrants will be reviewed by the Board of Water Supply and the Fire Department as part of subsequent permit processing of a project-specific development.

10. Police Protection

Existing Conditions

The City and County of Honolulu Police Department divides the island of Oahu into four districts as follows:

<table>
<thead>
<tr>
<th>District #</th>
<th>General Areas Included</th>
<th>Headquarters Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>East Honolulu to Primary Urban Center</td>
<td>Honolulu</td>
</tr>
<tr>
<td>2</td>
<td>Mililani, Wahiawa, and North Shore up to Waimau Bay</td>
<td>Wahiawa</td>
</tr>
<tr>
<td>3</td>
<td>Red Hill, Pearl City, Waipahu, Ewa and Waianae</td>
<td>Pearl City</td>
</tr>
<tr>
<td>4</td>
<td>Waimanalo to Kahuku</td>
<td>Kaneohe</td>
</tr>
<tr>
<td>5</td>
<td>Nuuanu to Airport</td>
<td>Kalihi Valley</td>
</tr>
</tbody>
</table>
In one of the three beats along the North Shore, Mokuleia is in Beat 227 of District 2 which ranges from Kaena Point to the Waialua Long Bridge. Other North Shore areas provided police protection by the Wahiawa headquarters extend from Long Bridge to Anahulu Bridge (Beat 228) to Waimea Bay (Beat 229).

A main station, the Wahiawa Police Station, is staffed by a major, a captain, 3 watch commanders (lieutenants), and 3 sergeants. Three shifts, or watches, operate from this station. Each shift has about 20 people, including 1 watch commander and 3 sergeants.

The Wahiawa District had the lowest overall number of major crimes reported during 1984, accounting for 7 percent of the total islandwide number reported (City and County of Honolulu Police Department, 1985).

The Kahuku Police Substation, which is under the Kaneohe Police Station, recently became operational. The Police Department currently has long range plans to establish this as a main station, although implementation of this plan depends on funding. When this change occurs, the entire North Shore, including the Mokuleia area, will be included in the Kahuku District. The change in status of Kahuku from a substation to a district station would not automatically increase police services. The delivery of police services is based on a sufficiency of personnel and other resources. If an increase in population were to occur in a
particular area, police services would not increase without an increase in the total authorized police manpower.

Potential Impacts and Mitigative Measures

While there is no site- or project-specific proposal, the following potential impacts may apply. Resort development will generate occasional, unavoidable demand for police services. While specific crimes related to rural resorts have not been fully addressed in interviews with police personnel nor studied in detail, the following are observations raised by police personnel and other community informants for consideration:

1. Construction related crime generated by a project would probably be typical of other construction sites. These mostly pertain to the theft of construction material, which occasionally occurs on the North Shore now.

2. The only resort in the vicinity of the North Shore is the Turtle Bay Hilton and Country Club in Kahuku. Currently, this resort does not seem to generate nor be the site of unique resort related crime.

3. The most frequent tourist-related crime on the North Shore is theft of valuables from parked cars and beaches, particularly at scenic points, surfing spots, or congested areas. Many
people pointed out, however, that these crimes do not stem
from any kind of hostility towards tourists. Rather, tourists
are easy victims because of the "vacation attitude" of being
carefree about your belongings, coupled with the feeling that
nothing bad happens in "paradise".

The Mokuleia region does not currently have major crime
problems. Crimes in the region reported to police generally
are due to the area's relative isolation and include marijuana
growing, illegal firearms practice and speeding.

Resort development would, in effect, reduce the area's current
isolation. While on one hand, increased population generally
means a higher number of crimes, this increase may also change
the nature of crimes.

5. Other police-related concerns would include evacuation
management, in the event of tsunamis and other disasters.

Resort developers may take other measures towards providing
on-site security. Buildings and other facilities within project
sites can be designed with adequate attention to the principles of
general health and safety. In addition, private security services
may be provided within the resort facilities.
11. **Schools**

**Existing Conditions**

The public schools nearest to the Mokuleia area are Waialua Elementary School (grades Kindergarten through six) and Waialua High and Intermediate School (grades seven through twelve).

Waialua Elementary School, located adjacent to the Waialua Recreation Center, currently operates self-contained classrooms, where students generally remain in one classroom throughout the school day. Waialua High and Intermediate, located at the junction near Mokuleia, makes heavy use of portables to accommodate increasing enrollments. Current enrollment at the latter facility is 1,165 students.

Both elementary and secondary schools are currently operating at capacity.

**Potential Impacts and Mitigative Measures**

Impacts on schools will be limited to the extent that the Secondary Resort designation for Mokuleia is responsible for increasing school-age population in the area. Mitigation measures include keeping the Department of Education apprised of specific
resort proposals being processed as Development Plan amendments and their timetables so that adequate classroom and staffing can be planned.

12. Health Care Facilities

Existing Conditions

The Mokuleia area is in proximity to two acute care hospitals. Wahiawa General Hospital is located in Central Oahu. This 69-bed acute care hospital contains 50 medical/surgical beds, 5 critical care beds and 14 obstetric beds. As with other hospitals located outside of Honolulu, Wahiawa General Hospital experiences low occupancy. In 1985, an average of 67.3 percent of the hospital beds were occupied.

Kahuku Community Hospital is located on the North Shore. This hospital contains 11 beds, 6 of which are medical/surgical; 2, critical care; and 3, obstetric. Kahuku's 1985 occupancy rate was 47.7 percent. Because of the North Shore's relative isolation from major medical service, Kahuku maintains a helipad for medical evacuation helicopters furnished by the Medical Assistance to Safety in Traffic (MAST) program based at Wheeler Air Force Base.
Potential Impacts and Mitigative Measures

There will be an occasional and unavoidable demand for emergency services for the future population growth in the Mokuleia area. In the event that neither hospital is able to meet major emergency needs, patients can be flown by MAST to Honolulu.

Because the existing acute care hospitals are currently experiencing low occupancy rates, resort development in Mokuleia is not expected to cause undue strain to either of these hospitals.

It is anticipated that the private and public health care network would develop according to the needs of the population and that these facilities would expand if necessary. It is also noted, however, that historically, rural and suburban residents often tend to utilize hospitals located in metropolitan Honolulu for their hospital needs, even though they may live a short distance from a rural/suburban hospital. This trend accounts for the relatively low occupancy rates of the out-of-Honolulu hospitals. Unless Wahiawa General and Kahuku Community Hospitals greatly expand their facilities, it is expected that the trend will continue.
PART V

PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED AND MITIGATING MEASURES

The General Plan amendment for the addition of a Secondary Resort Area at Mokuleia is not site- or project-specific and, therefore, there are no real direct impacts which can be attributed to the General Plan amendment. Approval of the proposed action to amend the General Plan would in no way obligate the City to give approval to develop specific sites for resort development in the area. However, should specific sites and resort proposals ultimately be processed and approved, the following are potential impacts and mitigating measures that will require full study and discussion in subsequent requirements for an EIS.

A. AGRICULTURE

Adverse Effect

Specific resort proposals are likely to be on lands zoned and planned by the State and City for agriculture. Should this occur, a loss of land zoned and planned for agriculture would result.

Mitigating Measures

Preliminary findings based on general observations indicate that the loss of agricultural lands may not affect adversely the statewide growth of agriculture. These findings, however, are subject to
further study and analysis based on a specific location for a resort development. Mitigating measures, if any, would be a part of such further studies.

B. NOISE (Construction)

Adverse Effect

Construction activities will generate noise.

Mitigating Measures

The State Department of Health (DOH) Title 11, Administrative Rules, Chapter 43, Community Noise Control for Oahu, specifies maximum allowable levels of noise for each use zone contained in the City and County of Honolulu's Comprehensible Zoning Ordinance. Construction activities which exceed the noise limitations of DOH rules require a permit from the DOH. Traffic noise from heavy vehicles traveling to and from the construction site must comply with Vehicular Noise Control of Oahu enforced by DOH.

C. TRAFFIC

Short Run Adverse Impact

Construction activities may disrupt traffic temporarily when construction activities are conducted in or near roadways.
Mitigating Measures

Contractors will observe State and County ordinances dealing with work conducted on or near roadways.

Long Run Adverse Impact

Traffic will increase due to the establishment of visitor facilities.

Mitigating Measures

Requirements of the State Department of Transportation and the City Department of Transportation will be required.

D. WATER CONSUMPTION

Adverse Impact

A Mokuleia resort development may require additional water usage.

Mitigating Measures

The Mokuleia Aquifer is a sub-zone of the Waialua Water Control area controlled by the Board of Land and natural resources. Studies indicated that the Mokuleia Area has an abundance of water and a sustainable yield of 20 million gallons per day. Less than 40% of
that yield is in use today. Use of additional water at the Mokuleia Development will provide economic benefits to the North Shore area without causing any water shortage.

E. LIFESTYLE CHANGES

Adverse Impact

Changes in lifestyle might be prompted by a proposed development.

Mitigating Measures

Lifestyle and perceived lifestyle changes are subjective in nature. Different individuals may be impacted differently or perceive the impacts as different. For example, an unemployed person or person facing an uncertain employment future in a struggling industry or a person that commutes over an hour each way to work may welcome the availability of jobs generated at a proposed project. On the other hand, a person who has sought out the rural lifestyle on the North Shore knowing the drawbacks may not be happy about the prospect of further development in the North Shore area although new jobs or economic growth will occur.

Keeping the lines of communication open with the community in order to discover the community concerns will allow those proposing projects to mitigate their projects' impact.
F. INCREASED NEED FOR UTILITY SERVICES

Adverse Impact

Additional demand will be placed on the utility companies to serve a new project.

Mitigating Measures

As part of the planning process, coordination with the utility companies will ensure that adequate services are provided.

G. INCREASED NEED FOR PUBLIC SERVICES

Adverse Impact

The need for public services such as police, fire, schools, parks and recreational facilities will increase due to the increase in visitor population generated by a resort project.

Mitigating Measure

Resort developments generate increased economic activity. This economic activity in turn increases government revenues. The impact of project-specific proposals on government finances would be assessed during the Development Plan amendment process.
H. SEWAGE AND SOLID WASTE

Adverse Impact

Additional population will generate increased sewage for treatment and increased solid waste for disposal.

Mitigating Measures

New sewage treatment facilities, either privately built or in cost sharing with the City's proposed facility, would be required to serve a resort development. Operations of sewage treatment plants have traditionally been paid through user fees or subsidized by tax revenues. Solid waste disposal for resort development in Honolulu is provided by private enterprise and presumably the costs are covered by the fees paid.
PART VI
ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The General Plan amendment to designate Mokuleia as a Secondary Resort Area will not result in any irreversible and irretrievable commitments of resources. The General Plan amendment proposal itself is a limited policy change which in effect permits specific proposals for resort development in the Mokuleia area to be considered in the City and County of Honolulu's Development Plan process. Assuming resort development ultimately takes place the following may result:

Construction and operation of resort development at Mokuleia may result in the irretrievable commitment of resources. During the construction phase labor, land, building materials and capital will be committed to the development of the project. Once committed labor is irretrievable, and building materials may have some salvage value but it is likely to be small. Capital committed to the project cannot be used for other projects and the land, once improved with infrastructure and buildings, is likely to remain committed to the designated use during the economic life of those improvements.

Ongoing operation of a resort community will result in the long term commitment of land to resort uses. This loss of agricultural land is not expected to have a negative impact on the agricultural production or potential production of the State of Hawaii or the City and County of
Honolulu because of the large amounts of agricultural land that has been released and is forecasted to be released from sugar and pineapple operations.

Water consumption may be increased with resort development; however, the Mokuleia aquifer from which water will be supplied is in surplus and there are no known proposals which would alter this situation. Operation of the development will require the long term commitment of labor to provide the services and maintenance necessary for the proper functioning of a resort.

In the long run assuming a successful enterprise the capital committed to the resort development will be paid back and can then be used for alternative uses. A successful economic venture may in fact lead to capital creation which in the long run would provide an increase in the capital available for investment.
PART VII

THE RELATIONSHIP BETWEEN
LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND
THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The proposed General Plan amendment will allow specific proposals for resort development in the Mokuleia area to be considered for Development Plan processing. Such a change will permit a more thorough assessment of potential land uses. This will open the assessment process to a wider variety of alternatives and should permit a broader view of short- and long-range benefits and costs. However, if a resort is ultimately developed at Mokuleia the following may result:

A Mokuleia resort development will result in a change in land use which will involve environmental trade-offs.

In the short run, development of a resort project will likely result in the reduction of lands available for agricultural use and a number of negative environmental impacts necessitated by construction activities including construction noise, dust and traffic impacts. These same construction activities will contribute to the economic well being of the local construction industry including contractors, construction workers, and material suppliers. The increased economic activity will contribute to the well being of the State and County economies.

The major long-term benefit of the proposed project is the creation of an economic asset which will provide long-term job opportunities and an
expansion of Hawaii's major export industry. Beneficiaries of the positive economic impact will be hotel employees, hotel operators, other tourist businesses, the land owner, and State and local tax revenues. Negative impacts are outlined in Section V, Adverse and Unavoidable Effects.

A resort development is unlikely to pose long-term risks to health and safety.

Development of a resort will result in the foreclosure of alternative uses for the land during the economic life of the project.
PART VIII

ALTERNATIVES TO THE PROPOSED ACTION

The purpose of this section is to develop, describe, and weigh alternatives to the proposed action which can involve significant trade-offs among the uses of environmental resources.

For the purpose of this EIS three (3) alternatives have been considered.

A. NO ACTION

No action would mean that the amendment to the General Plan designating Mokuleia as a Secondary Resort Area would not be made.

This would mean that resort development proposals for the Mokuleia area could not be considered under the City and County Development Plans.

No action would mean that resort proposals would be restricted to the areas already identified in the General Plan as Primary or Secondary Resorts. These sites are Waikiki, West Beach, Kualoa, Makaha and Laie.

No action would not change the demand for additional visitor accommodations in the future; it would only limit the areas in which such expansion could occur.
B. DESIGNATION OF ALTERNATE SECONDARY RESORT AREA

The City Charter states that the General Plan must be revised at least every five years. It was last revised in 1985. The Department of General Planning is currently developing some additional revisions to be proposed in 1987. Therefore, this proposed amendment to the General Plan is timely.

Based on the marketing data presented in Part II.D. of this EIS, demand will exist for the designation of additional secondary resort areas on the island of Oahu.

The extent to which other areas on Oahu may be suitable for resort development was not explored in detail. The primary reason for not doing so is that development of resort properties outside of established resort areas requires massive capital investment. Such investments require the identification of a financial backer or landowner prepared to invest substantial sums to develop and market the property as a resort. This process tends to be long and uncertain. Accordingly, it makes more sense to consider potential resort sites which already possess owners or backers financially able to make the investment. In the designation of secondary resort sites, identifying a responsible developer or owner is as important as other ingredients such as an appropriate location, availability of water, proximity to labor sources, etc.
C. EXPANSION OF EXISTING RESORT AREAS ON OAHU

General Plan policies for Waikiki clearly limit the potential for developing additional visitor units in Waikiki. Waikiki can not be expected to substantially contribute to the need for additional visitor units to meet projected visitor demands.

With respect to already designated secondary resort areas (West Beach, Kahuku, Makaha and Laie), the Development Plans for these areas specifically limit the number of visitor units allowed, and that total, together with units already built, will not meet the expected demand for visitor accommodations through the year 2005.

The adopted General Plan in establishing the existing four (4) secondary resort areas does not specify a minimum or maximum of visitor units each area is to accommodate. This is a function of the development plans. The Waianae Development Plan (Makaha resort) limits visitor accommodations to a modest 500 units, while the resort area in Laie (Koolauola Development Plan) is limited to only 300 units. These limits essentially recognize the number of units presently at the two areas, and suggests a policy of no further growth in tourism for the areas.

In comparison, West Beach (Ewa Development Plan) and Kahuku (Koolauola Development Plan) resorts are areas being planned as major resort destinations that are targeted for new visitor units. Both of these
areas have identical limits, set at 4,000 units each. These limits were established only after long discussion and agreement between the developer, community and the City Council. Infrastructure requirements and other facilities and services were designed and planned with these limits in mind. Zoning for West Beach and Kahuku has been approved. The development schedules for West Beach and Kahuku suggest a 10-year plus program. Expanding the resort facilities at these locations, as an alternative approach of addressing the identified problem, is possible but unlikely to receive community and political support.

The following criteria are used in determining that Mokuleia represents a desirable location for a secondary resort area. Large areas under single ownership are found in the Mokuleia area that extend from the mountains to the sea which could accommodate a well-planned visitor destination, offering a variety of services, jobs and recreational pursuits in a development that could be designed to be sensitive to neighboring communities, existing lifestyles and the natural environment (objectives of both the State and City).
PART IX

THE RELATIONSHIP
OF THE PROPOSED ACTION
TO LAND USE POLICIES AND CONTROLS
FOR THE AFFECTED AREAS

A. Hawaii State Plan

The proposed Mokuleia Secondary Resort Area would be consistent with
the following objectives and policies of the Hawaii State Plan, as
stated in Chapter 226 of the Hawaii Revised Statutes:

Objectives and policies for population (Section 5)

(b)(3) Promote increased opportunities for Hawaii's people to pursue
their socio-economic aspirations throughout the islands.

Comment: Resort use will provide a wider range of employment and
business opportunities to the Waialua community. It will provide more
choices of lifestyle and jobs for this community, particularly for the
young people who grow up and want to remain in the area.

Additionally, it may eventually help provide more incentive to the
nearby students to seek more education, in order to qualify for the
higher-paying managerial and skilled jobs.
Objectives and policies for the economy in general (Section 6)

(a)(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaii's people.

(b)(8) Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.

(b)(10) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected unemployment problems.

(b)(13) Encourage businesses that have favorable financial multiplier effects within Hawaii's economy.

Comment: Resort use will provide the North Shore with employment and business opportunities.

Resort jobs would increase the range of employment choices within a reasonable traveling distance for residents along the North Shore, particularly those in Waialua.

The primary single source of employment is the sugar mill which provided 3,000 jobs at its peak and now maintains a current employment of 460. A resort project would, in effect, create an alternative employment base.
Resort development is both labor-intensive and provides a favorable financial multiplier. For example, it is estimated that a resort use at Mokuleia could produce direct operational employment at the equivalent of 0.9 full-time employees per hotel unit. In turn each unit could generate an equivalent number of indirect and induced employees. Similarly, for each dollar spent by a visitor the Department of Planning and Economic Development estimated in 1984 that essentially an equal amount is generated for indirect and induced expenditures.

While the exact breakdown in job choices cannot be determined at this time, the State Tourism Manpower Simulation Model provides a preliminary basis for estimating the type of jobs which might be generated by the Mokuleia resort development (State of Hawaii, Department of Planning and Economic Development, 1978). Estimated percent distribution by industry and occupation of direct, indirect and induced employment generated by the proposed expansion is as follows: 31 percent of all jobs could potentially be in eating and drinking establishments; 28 percent, in resort and hotel facilities; 22 percent in transportation related sectors; 14 percent in the service sectors; and 5 percent in the retail areas.

Also expected to result from a resort use is the expansion of business opportunities, particularly in Haleiwa. Commercial developments in this town have been gradually changing to appeal more to the visitor market.
Objectives and Policies for the economy — visitor industry (Section 8)

(b)(4) Encourage cooperation between the public and private sectors in developing and maintaining well designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.

(b)(6) Provide opportunities for Hawaii's people to obtain job training and education that will allow for upward mobility within the visitor industry.

(b)(9) Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawaii's cultures and values.

**Comment:** Waikiki is virtually Oahu's only community which offers a full range of resort facilities. Currently, the area is intensely developed. It is unrealistic to expect Waikiki to undergo major physical changes which will either accommodate increasing lodging demands or provide an alternative to high density resort.

While Waikiki continues to be the "symbol" of Hawaii for many visitors, there is a growing need to provide a resort setting which, unlike the high-rise nature of the origin of many visitors, will enhance the beauty of the island's natural resources. While such alternative settings will be provided by the proposed expansion of the
Kuilima resort and the proposed West Beach development, a resort at Mokuleia could add another dimension to an alternative setting by providing both mountain and beach recreational resources and accesses possibly within one development. Such a setting will be conducive to fostering an appreciation of Hawaii's cultural relationship to the land.

Other factors which would attract hotel guests to Mokuleia include:

1. Unique location on Oahu
   - accessible to and from Waikiki, the Honolulu central business district and all areas of Oahu
   - oceanfront, rural environment

2. Range of potential recreational opportunities
   - onsite golf course, possible polo field, hiking trails, riding trails, camping grounds, tennis ranch and sports center
   - beach activities including swimming, surfing, windsailing and boating
3. Range of entertainment and commercial services

- entertainment at hotel facilities

- variety of food and beverage services at hotel and commercial facilities

Mokuleia as a resort area could significantly contribute to the general welfare and prosperity of residents in the area by offering employment opportunities and encouraging business investments. Job training is another possibility.

Objectives and Policies for the physical environment — land-based, shoreline, and marine resources (Section 11)

(b)(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.

(b)(3) Take into account the physical attributes of areas when planning and designing activities and facilities.

(b)(9) Promote increased accessibility and prudent use of inland and shore areas for public recreational, educational, and scientific purposes.
Comment: Because the Mokuleia area encompasses mountain and beach features, it allows for a wide range of both land-based and water-based activities. Land-based activities could include residential and resort uses, as well as outdoor recreation, such as golfing, tennis, equestrian-related activities, and camping and hiking. Water-based activities could include ocean recreation, such as swimming, diving, boating, and windsailing. These two groups, as well as their sub-groups, could be ensured compatibility with each other through the use of physical design barriers, such as buffer zones, and through management practices.

The successful marketability and execution of both the land-based and water-based activities will depend, to a large extent, on the natural beauty of the area. Much of the natural resources and ecological systems will be protected through careful planning and the use of buffer areas between sensitive areas and high intensity uses.

In Mokuleia, large areas under single ownership, extending from the mountains to the sea, are available that could accommodate a well-planned visitor destination that would be sensitive to neighboring communities, existing lifestyles and the natural environment.

While the shoreline provides access to the ocean, it is fronted, to a large degree, by private property which limits convenient ocean access. Mountain access is likewise restricted by continuous private property. A resort use will likely improve the region's overall access to the resources of the mountains and the ocean.
Objectives and policies for the physical environment — scenic, natural beauty and historic resources (Section 12)

(b)(3) Promote the preservation of views and vistas to enhance visual and aesthetic enjoyment of mountains, ocean, scenic landscapes and other natural features.

(b)(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawaii's ethnic and cultural heritage.

Comment: A resort use at Mokuleia could maintain and enhance scenic views and promote aesthetic enjoyment of the ocean and mountains through setbacks, building locations, landscaping, and by focusing the development around a recreational theme.

A resort at Mokuleia would also contribute to the determination of the historic and archaeological resources of the area, and through proper planning ensure its consideration and protection in the design of the development.

Objectives and policies for facility systems — water (Section 16)

(b)(3) Reclaim and encourage the productive use of runoff water and waste water discharges.
(b)(4) Assist in improving the quality, efficiency, service and storage capabilities of water systems for domestic and agricultural use.

Comment: A resort use could incorporate open space-type uses like golf courses to accommodate any flooding or drainage runoff, which can then be designed into waterways providing passive recreation enjoyment.

Development is also likely to improve the regional water system by replacing it with a new water system designed to meet the project's needs. New water wells, water reservoirs, and other water improvements would be made to upgrade water service in the area.

Objectives and policies for socio-cultural advancement -- leisure

(Section 23)

(b)(2) Promote a wide range of activities and facilities to fulfill the cultural, artistic and recreation needs of all diverse and special groups effectively and efficiently.

(b)(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that inherent values are preserved.

Comment: A resort at Hikulei could be designed around the passive and active recreation potentials of the area. Mauka of Farrington
Highway could offer recreational opportunities for a wide range of people and income levels. Golf courses, tennis courts, polo fields and related equestrian activities, and mountain trails for hiking and camping are possible.

The main recreational feature makai of Farrington Highway is the beach. A resort at Mokuleia could provide convenient public access to the shoreline. Users, including resort clientele and the general public, would have leisure opportunities for a variety of water-oriented activities.

Priority Guidelines

Priority Guidelines means those guidelines which shall take precedence when addressing areas of statewide concern. The proposal to designate a secondary resort at Mokuleia is most likely to impact on the Economic (Section 226-103), Population Growth and land resources and Affordable Housing (Section 226-106) of the priority guidelines.

While there are numerous priority guidelines dealing with State policy for every activity in the State, there are a number of priority guidelines which appear to deal directly with the proposal for a secondary resort designation at Mokuleia.

Economic (Section 226-103)

(a)(8) Provide public incentive and encourage private initiative to develop and attract industries which promise long-term growth potentials and which have the following characteristics.
(A) An industry that can take advantage of Hawaii's unique location and available physical and human resources.

(B) A clean industry that would have minimal adverse effect on Hawaii's environment.

(C) An industry that is willing to hire and train Hawaii's people to meet the industry's labor needs.

(D) An industry that would provide reasonable income and steady employment.

(b)(2) Encourage the development and maintenance of well-designed, adequately serviced hotels and resort destination areas which are sensitive to neighboring communities and activities and which provides for adequate shoreline setbacks and beach access.

Comment: A General Plan designation of a secondary resort area at Mokuleia would allow for the review of various proposals for hotel and resort development. Many of the existing hotel and destination resort developments on Oahu and the Neighbor Islands have met the criteria for desirable industries as discussed in Section 103(a)(8)(A)-(D). The planning and review process contained in the City and County of Honolulu Development Plan Process will allow for full participation by various government agencies for encouraging the desired development.
Additionally the mandate of Guideline (b)(2) would also be encouraged by providing potential developers with an alternative location on the Island of Oahu.

**Population Growth and Land Resources**

(b)(12) Utilize Hawaii's limited land resources wisely, providing adequate land to accommodate projected population and economic growth needs while ensuring the protection of the environment and the availability of the shoreline, conservation lands, and other limited resources for future generations.

**Comment:** Approval of a secondary resort designation for the Mokuleia area will allow for the planning and review process of the State and County governments to evaluate land use proposals for the area.

Resort development on Oahu's North Shore could provide for economic diversification of the area, particularly for the community of Waialua and within the moderate population growth scenario planned for the area.

**Affordable Housing** (Section 226-106)

**Comment:** While none of the seven priority guidelines of the affordable housing section appear to apply directly to the secondary resort designation at Mokuleia, to the extent that jobs created in the area
provide jobs for people already living in the area who are unemployed or underemployed, the affordability of housing for those people will be enhanced. In addition, economic development in labor intensive activities such as resort development give developers and hotel operators a vested interest in assuring that their employees will be suitably housed. This has led to innovative housing and/or transportation alternatives in some jurisdictions.

In summary, amendment of the General Plan to include a secondary resort at Mokuleia will be in consonance with a number of the goals stated in the priority guidelines of the Hawaii State Plan.

B. **State Functional Plans**

The broad goals and objectives of the Hawaii State Plan are translated into detailed courses of action by the State Functional Plans. Ten of the 12 mandated Functional Plans were adopted by the Twelfth State Legislature in April 1984. The Agriculture and Education Functional Plans were adopted by the Thirteenth Legislature in April 1985. This section identifies the relationship of the proposal to relevant State Functional Plan objectives.

**State Agriculture Functional Plan**

Objective B, Policy 4: Encourage productive agricultural use of the most suitable agricultural lands.
Comment: Most of the Mokuleia area is currently classified by the State as agriculture. It is also primarily designated for Agriculture on the North Shore Development Plan, as well as zoned for Agriculture on the Zoning Maps.

A resort at Mokuleia will likely involve lands that are State classified as Agriculture. Therefore, a loss of agricultural lands is a potential impact. However, whether this potential loss would affect statewide growth of diversified agriculture or aquaculture would be determined when a site-specific/project-specific resort proposal is processed as a Development Plan amendment, and subsequently when a proposal is made to change the State land use classification to Urban. (For a further discussion see Section IX, page 29).

State Recreation Functional Plan

Objective A, Policy 2: Ensure that intended uses for a site respect community values and are compatible with the area's physical resources and recreation potential.

Objective A, Policy 3: Emphasize the scenic and open space qualities of physical resources and recreation areas.

Objective C, Policy 1: Maintain an adequate supply of recreation facilities and programs which fulfill the needs of all recreation groups.
Objective D: Assure the provision of adequate public access to lands and waters with public recreation value.

Objective E, Policy 3: Coordinate visitor and resident recreation interests to achieve compatible recreation usage.

Comment: Mokuleia today is known for its scenic environment and recreational amenities that include beach parks, camping facilities and polo activities. However, public access to the shoreline is limited to the City's Mokuleia Beach Park, and there is no public access to the mountains. With a resort development greater accessibility to the ocean shores and mountain areas is possible. Also, the opportunities for expanding and adding new recreational activities to the area to serve a variety of leisure needs are strong potentials with a resort development. To achieve compatible recreation usage, design measures and management practices could be developed to ensure that the recreational interests of visitors and residents are achieved.

State Tourism Functional Plan

Objective B, Policy 3: Encourage greater cooperation between the public and private sectors in developing and maintaining well-designed and adequately serviced visitor industry and related developments.

Objective B, Policy 4: Ensure that visitor facilities and destination areas are carefully planned and sensitive to existing neighboring communities and activities.
Objective C: Enhancement of career and employment opportunities in the visitor industry.

Objective C, Policy 2: Provide opportunities for Hawaii's people to obtain job training and education that will allow for upward mobility within the visitor industry.

Objective D: Development of better relations and mutual awareness and sensitivity between the visitor industry and the community.

Comment: Resort use at Mokuleia will require consideration of social, visual, and environmental factors, including employment, job training, recreational needs, scenic enhancement, shoreline protection, and provisions for adequate services and facilities. To minimize adverse impacts, extensive public participation will be required throughout the planning and zoning processes. The result of such an effort will help ensure that all of the uses within and adjacent to any development are compatible with each other.

C. General Plan For The City And County Of Honolulu

The General Plan is the City and County commitment to the desirable and attainable future of Honolulu. This section discusses how this amendment conforms to and implements the General Plan.
Objectives and Policies for Population

Objective B, Policy 2: Provide adequate support facilities to accommodate future growth in the number of visitors to Oahu.

Comment: Based on the anticipated supply and demand relationships for visitor units on Oahu, the visitor industry could be expected to require about 18,900 to 22,700 additional rooms by 2005. Already intensely developed, Waikiki cannot be expected to accommodate these projected needs, even though it will continue to dominate Oahu's visitor accommodation industry. A resort development at Mokuleia will help the island's visitor industry by accommodating some of the lodging needs required by 2005.

Objectives and Policies for Economic Activity

Objective A: To promote employment opportunities that will enable all the people of Oahu to attain a decent standard of living.

Objective A, Policy 2: Encourage the development of small businesses and larger industries which will contribute to the economic and social well-being of Oahu residents.

Comment: Resort use at Mokuleia would provide the North Shore with employment and business opportunities. Resort use would generate direct, indirect and induced jobs on Oahu.
These jobs would increase the range of employment choices within a reasonable travelling distance for residents along the North Shore, particularly those in Wai'alea. The primary single source of employment is the sugar mill, which at its peak provided 3,000 jobs and now maintains a current employment of 460. Resort use would, in effect, create an alternative employment base and would also increase the range of business opportunities for area residents. The market support for retail space at Mokuleia would result from shopping needs of onsite visitors and residents, off-resort visitors and neighboring North Shore residents.

Objective B: To maintain the viability of Oahu's visitor industry.

Objective B, Policy 6: Permit the development of secondary resort areas in West Beach, Kahuku, Makaha, and Laie.

Objective B, Policy 7: Manage the development of secondary resort areas in a manner which respect existing lifestyles and the natural environment, and avoids substantial increases in the cost of providing public services in the area.

Comment: The applicant has proposed an amendment to the General Plan to include Mokuleia as a secondary resort area.

Based on the anticipated supply and demand relationships for visitor units on Oahu, the visitor industry could be expected to require about
18,900 to 22,700 additional rooms by 2005. This represents a requirement of 9,500 to 13,300 rooms in addition to the inventory which is currently being planned for Oahu.

Already intensely developed, Waikiki cannot be expected to accommodate these projected needs. Resort use at Hokuleia would help the island’s visitor industry by further accommodating some of these lodging needs.

Both the surrounding and islandwide communities have an image of the Hokuleia area being associated with recreational activities. Land uses therefore could be planned to complement the existing image and character of the area.

The property mauka of Farrington Highway could offer recreational opportunities for a wide range of interests while maintaining the open space quality by including such uses as golf courses, tennis courts, polo fields and related equestrian activities, mountain trails for hiking and camping.

Recreational features makai of Farrington Highway could provide convenient public access to the shoreline for resort clientele and the general public.

Community concerns and needs in resort planning could be addressed by meeting with community members to see how the resort use could address their needs and concerns.
Public costs for necessary infrastructure could be greatly minimized by developers funding a project's needed improvements such as any sewerage and water systems and roadway improvements.

Objective E, Policy 1: Encourage the training and employment of present residents for currently available and future jobs.

Comment: Resort use in Mokuleia would make a significant contribution toward preventing large-scale unemployment, especially along the North Shore and in particular the Waialua area. Direct, indirect and induced jobs would be created. Efforts to employ local residents to these jobs through employment training programs could be an essential feature of any resort use at Mokuleia.

Objectives and Policies for the Natural Environment

Objective A, Policy 4: Require development projects to give due consideration to natural features such as slope, flood and erosion hazards, water-recharge areas, distinctive land forms and existing vegetation.

Objective A, Policy 6: Design surface drainage and flood control systems in a manner which will help preserve their natural settings.

Objective A, Policy 7: Protect the natural environment from damaging levels of air, water and noise pollution.
Objective A, Policy 8: Protect plants, birds, and other animals that are unique to the State of Hawaii and the Island of Oahu.

Objective A, Policy 10: Increase public awareness and appreciation of Oahu's land, air, and water resources.

Comment: Existing land features of the area should be carefully considered in the design of a resort, leaving the steep terrain in its natural state for recreational enjoyment. Landscaping should be given consideration to the use of native plants suitable to the environment.

Portions of the low-lying areas near Farrington Highway are subject to flooding. A major feature of any resort would be the enhancement of the natural drainage ways as a recreational and aesthetic amenity. Building designs would take into account and protect against potential hazards of flood or tsunami inundation, and proper measures would be taken to ensure that air, water and noise standards are met.

Any project design would focus on the natural setting of the area, and its relationship to the mountains and the ocean. Resort development would foster a greater awareness and appreciation of the recreation and scenic values and assets of the area.

Objective B: To preserve and enhance the natural monuments and scenic views of Oahu for the benefit of both residents and visitors.
Objective B, Policy 2: Protect Oahu's scenic views, especially those seen from the highly developed and heavily travelled areas.

Objective B, Policy 4: Provide opportunities for recreational and educational use and physical contact with Oahu's natural environment.

Comment: The surrounding community often refers to the mountains in Mokuleia as the "Pali". Like the Koolau range, these mountains are breathtaking and spectacular. A carefully designed resort as one integral unit could preserve this view.

Access to the mountains could be planned and managed to permit Hawaii's families and visitors first-hand enjoyment. Several trails now lead from the lowlands to Peacock Flats, a plateau of the Waianae Mountains. These and other similar trails could be developed to offer the opportunity to experience and enjoy the rugged, natural beauty of the region. Camp grounds, developed in conjunction with the hiking trails, could augment the recreational facilities and appeal of the community.

On the makai side of Farrington Highway, convenient public access could be provided to the shoreline.

Objectives and Policies for Transportation and Utilities

Objective A, Policy 5: Improve roads in existing communities to reduce congestion and eliminate unsafe conditions.
Comment: Resort use in Mokuleia could reduce morning and evening peak hour congestion on Kaneohe and Kaukonahua Roads by providing alternate employment opportunities within close proximity to residential areas.

Objective B, Policy 1: Develop and maintain an adequate supply of water for both residents and visitors.

Objective B, Policy 5: Provide safe, efficient, and environmentally sensitive waste-collection and waste disposal services.

Comment: A resort at Mokuleia would improve the regional water system by replacing it with a new water system designed to meet the resort and adjacent residential needs. New water wells, water reservoirs, and other water improvements could be made to upgrade water service in the area.

The City and County of Honolulu is currently proposing to develop a wastewater treatment plan in the Waialua area. A resort would provide the opportunity to work jointly with the City to share in the solution of a joint need.

Objectives and Policies for Physical Development and Urban Design

Objective A, Policy 4: Require new developments to provide or pay the cost of all essential community services, including roads, utilities,
schools, parks, and emergency facilities that are intended to directly serve the development.

Objective A, Policy 7: Locate new industries and new commercial areas so that they will be well related to their markets and suppliers, and to residential areas and transportation facilities.

Comment: All improvements to any resort use at Hikulea would be provided by a developer in accordance with the requirements and standards of government agencies. The extent of any improvements would be resolved through the planning and zoning processes.

Commercial establishments in the Waialua region are currently limited to a sprinkling of food supermarkets and eating establishments and Waialua residents must travel to Haleiwa and elsewhere for most retail needs. Commercial components as a part of a resort would provide convenient shopping areas and eating establishments within easy driving distance for Waialua residents.

Objective D: To create and maintain attractive, meaningful, and stimulating environments throughout Oahu.

Objective D, Policy 2: Integrate the City and County's urban-design plan into all levels of physical planning and developmental controls.
Objective D, Policy 3: Encourage distinctive community identities for both new and existing districts and neighborhoods.

Objective D, Policy 4: Require the consideration of urban-design principles in all development projects.

Objective D, Policy 5: Require new developments in stable, established communities and rural areas to be compatible with the existing communities and areas.

Objective D, Policy 7: Promote public and private programs to beautify the urban and rural environments.

Comment: A resort use provides an excellent opportunity to capture the essence of urban design objectives with a unified design plan which will recognize, enhance, preserve and improve the area's scenic qualities, recreational environment and rural character. A unified development created in partnership with the community could maintain the attractive and stimulating environment of Mokuleia. All the services and facilities, including lodging, dining, recreation, entertainment and commercial uses could be managed in a manner that will benefit both residents and visitors.
Objectives and Policies for Public Safety

Objective B, Policy 2: Require all developments in areas subject to floods and tsunamis to be located and constructed in a manner that will not create any health or safety hazard.

Comment: The coastal portions makai of Farrington Highway, are in the Shoreline Management Area, and included in the Flood Hazard Districts of the City. Developments in these areas would require the issuance of a Shoreline Management Area Permit, and construction and location of structures would have to be designed to meet the safety standards of the City.

Objectives and Policies for Culture and Recreation

Objective B, Policy 1: Encourage the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.

Objective B, Policy 2: Identify, and to the extent possible, preserve and restore buildings, sites and areas of social, cultural, historic, architectural, and archaeological significance.

Comment: Archaeological studies would be performed by consultants for any resort use in Mokuleia and the findings of these studies would be incorporated as required into the development scheme of any project.
Objective D: To provide a wide range of recreational facilities and services that are readily available to all residents of Oahu.

Objective D, Policy 6: Provide convenient access to all beaches and inland recreation areas.

Comment: Resort use could improve the region's overall access to the resources of the mountains and the ocean. While the shoreline provides access to the ocean, it is fronted to a large degree by private property which limits convenient ocean access. Mountain access is likewise restricted by continuous private property. Convenient mauka and makai access could result from a resort use.

Conflict with State and City Policies

The Hawaii State Plan and the City and County of Honolulu General Plan contain a number of goals and objectives which are mutually exclusive. Thus, support of one of these goals invariably leads to potential conflicts with other goals. In the case of the proposal to create a secondary resort area at Mokuleia, the most significant potential conflict appears to be with State and City agricultural goals. The Department of Agriculture raised a number of specific objectives and policies relating to the protection and encouragement of state agriculture. The following is a listing of their comments and the responses that we offered to those comments.
DOA's comments on the DEIS contain a number of related concerns and questions regarding the impacts of the proposal on diversified agriculture. The responses herein have been prepared with input from Bruce Flasch, President of Decisions Analysts Hawaii, Inc. Before addressing these concerns and questions, however, the central argument contained in the agriculture analysis of the DEIS is reviewed:

For profitable crops, the growth of diversified agriculture will be limited by the size of the market, and not by a shortage of agriculture land (with the possible exception of lands for crops which are unique to a limited area such as Kula, Maui). It is unlikely that land availability will be a problem because the future requirements for diversified agriculture are very modest compared to the supply of land that will be available. According to A Report on the State of Hawaii Land Evaluation and Site Assessment System (LESA Commission, February 1986), which presents a very optimistic outlook for agriculture to the year 1995, the additional amount of prime agriculture land that will be required for diversified agriculture amounts to only 8,858 acres for the State and 2,314 acres for Oahu. In contrast, the supply of land available for diversified agriculture is huge, and includes: (1) over 80,000 acres of land which has been freed from sugar and pineapple since 1970 (with over 2,000 acres freed on Oahu); (2) land which is likely to be freed from sugar given the outlook for low sugar prices and the fact that most of the industry is unprofitable; and (3) land that is being held in sugar while awaiting discovery of profitable replacement crops. This land demand/supply
balance will not be materially affected by urbanization lands for a secondary resort.

The specific concerns and questions raised by the DOA follow:

1. "The DEIS should discuss how redesignation of the amendment area Secondary Resort Area status would affect Economic Activity, Objective C, Policy 2, 3, 5 and 6 of the General Plan, relating to the viability of agriculture on Oahu."

This objective and policies read as follows:

Objective C: "To maintain the viability of agriculture on Oahu."

Policy 2: "Support agriculture diversification in all agriculture areas Oahu."

Policy 3: "Support the development of markets for local products, particularly those with the potential economic growth."

Policy 5: "Maintain agriculture land along the windward, North Shore, and Waianae coast for truck farming, flower growing, aquaculture, livestock production, and other types of diversified agriculture."
Policy 6: "Encourage the more intensive use of productive agriculture lands."

**Response:** In view of the previous discussion, a secondary resort located at Mokuleia will involve too little land to affect the land economics of agriculture on Oahu. On the other hand, the resort will increase the market for crops (which is the limiting factor). Thus, the viability of diversified agriculture on Oahu will be possibly increased on the North Shore given the expanded market. In addition, a secondary resort located at Mokuleia would further other economic objectives and policies of the City and County (see DEIS, pp. IX-13 to 24).

2. "How does the proposed amendment conform to the State Agricultural Functional Plan and its objectives and policies, particularly Implementing Action (B)(5)(c)?"

Implementing Action (B)(5)(c) states that: "Until standards and criteria to conserve and protect important agriculture lands are enacted by the Legislature, important agriculture lands should be classified in the State Agriculture District and zoned for agricultural use, except where, by the preponderance of the evidence presented, injustice or inequity will result or overriding public interest exists to provide such lands for other objectives of the Hawaii State Plan."
Response: The principal economic force in Mokuleia is the Waialua Sugar Co., Inc., but driven by low sugar prices and the need to reduce costs, Waialua Sugar Co. has been reducing employment. Thus, sugar is incapable of providing sufficient jobs to provide employment to all those who are currently employed or who will be graduating from school. Given the limited growth potential of diversified agriculture, it will fall short of providing full employment. In contrast, a successful secondary resort would make a major contribution towards full employment. Furthermore, a secondary resort would involve too little land to adversely affect the growth potential of diversified agriculture.

Therefore, the overriding public interest that argues for development of the secondary resort at Mokuleia is, from the Hawaii State Plan, § 226-6, Objectives and policies for the economy-in-general, objective (1):

"Increase and diversify employment opportunities to achieve full employment, increase income and job choice, and improved living standards for Hawaii's people."

3. "How does the proposed amendment relate to Hawaii State Plan priority guidelines 226-104(b)(2) and 226-106(1), which direct the government into marginal or non-essential agriculture lands to meet housing needs, and '... (maintain) agriculture lands of importance in the agricultural district?"
The guidelines are as follows:

226-104(b)(2): "Make available marginal or non-essential agriculture lands for appropriate urban uses while maintaining agriculture lands of importance in the agricultural district."

226-106(l): "Seek to use marginal or non-essential agriculture land and public land to meet housing needs of low-moderate income and gap-group households."

Response: The intent of the priority guidelines are noteworthy and should be followed as much as practicable. However, it is also obvious that urban uses have not in the past and cannot in the future be confined solely to marginal or non-essential agriculture lands. Therefore, while the priority guidelines are recognized, the development of the other agriculture lands for urban use is inevitable in order to achieve results intended by other economic objectives, policies and priority guidelines (see DEIS pp. IX-1 to 13).

4. "What impact will this amendment have on future agricultural production requirements and expansion of diversified agriculture, as identified in the Final Report of the Land Evaluation and Site Assessment (LESA) Commission?"
Response: As noted previously, a second resort located at Mokuleia would increase the market for diversified agriculture crops which is the limiting factor for most crops, but would require far too little land to adversely affect growth in diversified agriculture.

Regarding the LESA report, the Legislature has taken no action on it. Furthermore, the report contains certain assumptions which seem to overstate land requirements for diversified agriculture, and understate land availability for profitable crops.

It is our belief that areas of conflict with specific State and City policies have been adequately addressed and discussed in the EIS. The applicant and the consulted parties have divergent viewpoints in some areas, particularly agriculture. The purpose of the EIS process is to expose these opinions in order that the public and the decisionmaking bodies can make an informed decision on the issue under study. We believe that the information with regard to conflicts in the area of state and local government policy have been adequately discussed.
PART X

AN INDICATION OF WHAT OTHER INTERESTS AND
CONSIDERATIONS OF GOVERNMENT POLICIES ARE THOUGHT
TO OFFSET THE ADVERSE ENVIRONMENTAL EFFECTS OF THE PROPOSED ACTION

The proposed General Plan amendment will broaden the opportunities for the private sector to implement government policies relating to economic growth. The following Objectives and Policies of the Hawaii State Plan are cited as examples:

Section 6, Economy in General

(a)(1) Increased and diversified employment opportunities to achieve full employment, increased job income and job choice, and improved living standards for Hawaii's people.

(b)(9) Encourage labor-intensive activities that are economically satisfying.

(b)(11) Promote economic activities, especially those which benefit areas with substantial unemployment problems.

(b)(14) Encourage businesses that have favorable financial multiplier effects within Hawaii's economy.
The following Objectives and Policies from the City & County of Honolulu General Plan are cited:

Objective A: To promote employment opportunities that will enable all the people of Oahu to attain a decent standard of living.

Objective A, Policy 2: Encourage the development of small businesses and larger industries which will contribute to the economic and social well-being of Oahu's residents.
PART XI

LIST OF NECESSARY APPROVALS

The General Plan amendment is not site- or project-specific, however, should resort proposals ultimately be approved, the following is a list of likely approvals that would have to be achieved.

<table>
<thead>
<tr>
<th>Approval</th>
<th>Approving Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Plan Amendment</td>
<td>City Council</td>
</tr>
<tr>
<td>North Shore Development Plan</td>
<td>City Council</td>
</tr>
<tr>
<td>Land Use Amendment/Public Facilities Amendment</td>
<td>City Council</td>
</tr>
<tr>
<td>Rezoning</td>
<td>City Council</td>
</tr>
<tr>
<td>Special Management Area Permit</td>
<td>City Council</td>
</tr>
<tr>
<td>Grading Permits</td>
<td>Department of Public Works</td>
</tr>
<tr>
<td>Building Permits</td>
<td>Building Department</td>
</tr>
<tr>
<td>Shoreline Certification</td>
<td>State Surveyor</td>
</tr>
<tr>
<td>Subdivision Approval</td>
<td>Department of Land Utilization</td>
</tr>
<tr>
<td>State Land Use Boundary Amendment</td>
<td>State Land Use Commission</td>
</tr>
<tr>
<td>Department of Army Permit</td>
<td>U.S. Army Corps of Engineers</td>
</tr>
<tr>
<td>Section 7 Consultation (Endangered Species)</td>
<td>U.S. Fish and Wildlife Service</td>
</tr>
<tr>
<td>Federal Consistency (with Coastal Zone</td>
<td>State Department of Planning and Economic</td>
</tr>
<tr>
<td>Management Act)</td>
<td>Development (DPED)</td>
</tr>
<tr>
<td>Conservation District Use Permit</td>
<td>State Department of Land and Natural Resources</td>
</tr>
<tr>
<td>Stream Permit</td>
<td>State Department of Land and Natural Resources</td>
</tr>
<tr>
<td>Approval of Drainage System</td>
<td>State Department of Transportation/</td>
</tr>
<tr>
<td></td>
<td>County Department of Public Works (DPW)</td>
</tr>
<tr>
<td>Approval</td>
<td>Approving Authority</td>
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<tr>
<td>----------------------------------------------</td>
<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>Approval of Wastewater Disposal System</td>
<td>State Department of Health/County</td>
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<td></td>
<td>Department of Public Works/County</td>
</tr>
<tr>
<td></td>
<td>Department of Land Utilization</td>
</tr>
<tr>
<td>Approval of Potable Water System</td>
<td>State Department of Land and Natural Resources</td>
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<td></td>
<td>State Department of Health/County</td>
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<tr>
<td></td>
<td>County Board of Water Supply</td>
</tr>
<tr>
<td>Historic Sites Review</td>
<td>State Department of Land and Natural Resources</td>
</tr>
<tr>
<td>Permit for Construction within State Highway</td>
<td>Department of Transportation/County</td>
</tr>
<tr>
<td>Rights-of-Way</td>
<td>Department of Transportation Services</td>
</tr>
<tr>
<td>Permit for installation of utility lines</td>
<td>Department of Transportation</td>
</tr>
<tr>
<td>within State Highway Rights-of-Way</td>
<td></td>
</tr>
<tr>
<td>Electric Connection Approval</td>
<td>Hawaiian Electric (HEI)</td>
</tr>
<tr>
<td>Telephone Connection Approval</td>
<td>Hawaiian Telephone Company</td>
</tr>
</tbody>
</table>
PART XII

AGENCIES, ORGANIZATIONS AND PERSONS WHO WERE SENT
A COPY OF THE NOTICE OF PREPARATION (NOP)

The EIS Notice of Preparation ("NOP") was officially published in the
Office of Environmental Quality Control ("OEQC") Bulletin on October 9,
1986. The following agencies, organizations and persons received a copy
of the NOP. Comments were received from twenty-five parties. Twenty
letters were sent in response to comments and five of the comments
received did not require responses. Copies of the comment letters and the
responses sent follow the summary.

<table>
<thead>
<tr>
<th>A. Federal Agencies</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. U.S. Army Corps of Engineers</td>
<td>10/23/86</td>
<td>11/18/86</td>
</tr>
<tr>
<td>2. U.S. Dept. of Agriculture, Soil Conservation Service</td>
<td>10/10/86</td>
<td>11/18/86</td>
</tr>
<tr>
<td>4. U.S. Dept. of Transportation, Federal Aviation Administration</td>
<td>10/24/86</td>
<td>11/18/86</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>B. State Agencies</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Dept. of Agriculture</td>
<td>10/21/86</td>
<td>11/18/86</td>
</tr>
<tr>
<td>2. Dept. of Education</td>
<td>10/29/86</td>
<td>11/18/86</td>
</tr>
<tr>
<td>3. Dept. of Health</td>
<td>11/10/86</td>
<td>11/18/86</td>
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<tr>
<td>4. Dept. of Labor and Industrial Relations</td>
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<tr>
<td>5. Dept. of Land and Natural Resources</td>
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<tr>
<td>6. Dept. of Planning and Economic Development</td>
<td>11/6/86</td>
<td>11/18/86</td>
</tr>
<tr>
<td>7. Dept. of Social Services and Housing</td>
<td>10/23/86</td>
<td>No response required</td>
</tr>
<tr>
<td>8. Dept. of Transportation, Highways and Airports Division</td>
<td>11/3/86</td>
<td>11/18/86</td>
</tr>
<tr>
<td>9. Representative Joe Leong</td>
<td></td>
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<tr>
<td>10. Senator Gerald Hagino</td>
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<td></td>
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<tr>
<td>11. Office of Environmental Quality Control</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. University of Hawaii Environmental Center</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. University of Hawaii Water Resources Research Center</td>
<td>10/28/86</td>
<td>No response required</td>
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</table>
### City and County Agencies

<table>
<thead>
<tr>
<th>Comments</th>
<th>Responses</th>
</tr>
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<tbody>
<tr>
<td>1. Mayor's Office</td>
<td>10/31/86 11/18/86</td>
</tr>
<tr>
<td>2. Department of General Planning</td>
<td>10/23/86 11/18/86</td>
</tr>
<tr>
<td>3. Board of Water Supply Development</td>
<td>10/23/86 11/18/86</td>
</tr>
<tr>
<td>4. Dept. of Housing and Community Development</td>
<td>10/29/86 11/18/86</td>
</tr>
<tr>
<td>5. Dept. of Land Utilization</td>
<td>10/29/86 11/18/86</td>
</tr>
<tr>
<td>6. Dept. of Parks and Recreation</td>
<td>10/29/86 11/18/86</td>
</tr>
<tr>
<td>7. Building Department</td>
<td>10/29/86 11/18/86</td>
</tr>
<tr>
<td>8. Dept. of Public Works</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>9. Dept. of Transportation Services</td>
<td>10/24/86 11/18/86</td>
</tr>
<tr>
<td>10. Honolulu Police Department</td>
<td>10/21/86 No response required</td>
</tr>
<tr>
<td>11. Honolulu Fire Department</td>
<td>10/21/86 No response required</td>
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### Community Organizations

<table>
<thead>
<tr>
<th>Comments</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. American Lung Association of Hawaii</td>
<td>10/23/86 11/18/86</td>
</tr>
<tr>
<td>2. Audubon Society of Hawaii</td>
<td>10/31/86 No response required</td>
</tr>
<tr>
<td>3. Belt Collins</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>4. Bishop Estate</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>5. Castle &amp; Cooke, Inc.</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>6. Conservation Council for Hawaii</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>7. Haleiwa Community Association</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>9. Hawaiian Telephone</td>
<td>10/31/86 No response required</td>
</tr>
<tr>
<td>10. Kahaluu Coalition</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>11. Kahaluu Community Association</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>12. Kahaluu Housing Corporation</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>13. Kahaluu Village Association</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>14. Koolauloa Community Council</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>15. Koolauloa Neighborhood Board No. 28</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>16. Life of the Land</td>
<td>11/7/86 11/18/86</td>
</tr>
<tr>
<td>17. Mokuleia Community Association</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>18. North Shore Career Training Corporation</td>
<td>10/14/86 11/18/86</td>
</tr>
<tr>
<td>22. North Shore Visitors Association</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>23. J. A. Parnell</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>25. Sierra Club, Hawaii Chapter</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>26. Sunset Beach Community Association</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>27. Waiakea Community and Businessmen's Association</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>28. Waikoloa Community Association</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>29. Waimea Falls Park</td>
<td>11/6/86 11/18/86</td>
</tr>
<tr>
<td>30. Wahiawa Neighborhood Board</td>
<td>11/6/86 11/18/86</td>
</tr>
</tbody>
</table>
Mr. Barry R. Okuda  
c/o Barry R. Okuda, Inc.  
Suite 1900, Pauahi Tower  
1001 Bishop Street  
Honolulu, Hawaii 96813  

Dear Mr. Okuda,  

Thank you for the opportunity to review and comment on the EIS Preparation Notice for the proposed general plan amendment to designate Mokuleia as a secondary resort area. The following comments are offered:  

a. In the event detailed site development plans incorporate construction within waters of the United States, headwater streams or wetlands, the plans should be submitted to the Operations Branch (telephone: 438-9258) for review and evaluation to determine the need for a Department of the Army permit.  

b. According to the Flood Insurance Rate Map, prepared by the Federal Insurance Administration for the City & County of Honolulu, a portion of the property is within the 100-year flood limit, with Zone A designation. The remaining portion is in Zone C and Zone D. An explanation of zone designations is given in the enclosure.  

Sincerely,  

[Signature]  
Kisuk Cheung  
Chief, Engineering Division  

Encl. (10-24-86)
**KEY TO MAP**

<table>
<thead>
<tr>
<th>500-Year Flood Boundary</th>
<th>ZONE A</th>
</tr>
</thead>
<tbody>
<tr>
<td>100-Year Flood Boundary</td>
<td>ZONE B</td>
</tr>
</tbody>
</table>

**Zone Designations** with Date of Identification: e.g., 12/3/74

**100-Year Flood Boundary**

<table>
<thead>
<tr>
<th>Base Flood Elevation Line With Elevation In Feet**</th>
<th>E.L. 987</th>
</tr>
</thead>
<tbody>
<tr>
<td>Base Flood Elevation In Feet Where Uniform Within Zone**</td>
<td>RM 7</td>
</tr>
<tr>
<td>Elevation Reference Mark</td>
<td>M 1.5</td>
</tr>
<tr>
<td>River Mile</td>
<td><strong>Referenced to the National Geodetic Vertical Datum of 1929</strong></td>
</tr>
</tbody>
</table>

**NOTES TO USER**

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.

This map is for flood insurance purposes only; it does not necessarily show all areas subject to flooding in the community or all planimetric features outside special flood hazard areas.

For adjoining map panels, see separately printed Index To Map Panels.

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**EXPLANATION OF ZONE DESIGNATIONS**

<table>
<thead>
<tr>
<th>ZONE</th>
<th>EXPLANATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Areas of 100-year flood; base flood elevations and flood hazard factors determined.</td>
</tr>
<tr>
<td>AO</td>
<td>Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depths of inundation are shown, but no flood hazard factors are determined.</td>
</tr>
<tr>
<td>AH</td>
<td>Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.</td>
</tr>
<tr>
<td>A1-A30</td>
<td>Areas of 100-year flood; base flood elevations and flood hazard factors determined.</td>
</tr>
<tr>
<td>A59</td>
<td>Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.</td>
</tr>
<tr>
<td>B</td>
<td>Areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. (Medium shading)</td>
</tr>
<tr>
<td>C</td>
<td>Areas of minimal flooding. (No shading)</td>
</tr>
<tr>
<td>D</td>
<td>Areas of undetermined, but possible, flood hazards.</td>
</tr>
<tr>
<td>V</td>
<td>Areas of 100-year coastal flood with velocity [wave action]; base flood elevations and flood hazard factors not determined.</td>
</tr>
<tr>
<td>V1-V30</td>
<td>Areas of 100-year coastal flood with velocity [wave action]; base flood elevations and flood hazard factors determined.</td>
</tr>
</tbody>
</table>
November 18, 1986

Mr. Kisuk Cheung
Chief, Engineering Division
Department of the Army
Building 230
Fort Shafter, Hawaii 96858

Re: Environmental Impact Statement Preparation Notice for
Proposed Secondary Resort Area Designation at Mokuleia,
Oahu, Hawaii

Dear Mr. Cheung:

Thank you for your comments of October 20, 1986 regarding the
subject prep notice. We respond as follows:

Comment a - Detailed plan submittal.

--- The General Plan amendment is not site- or proposal-specific
and therefore no detailed plans will be developed for the
General Plan change.

Comment b - Flood insurance designation.

--- Flood insurance designations will be considered in
connection with the Development Plan evaluation process for
site/proposal-specific developments.

Again, thank you for your comments.

Sincerely,

[Signature]
Barry R. Okuda
BRO:awp
DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY SUPPORT COMMAND, HAWAII
DUNNING HALL
FORT SHAFTER, HAWAII 96850-5000
October 23, 1986

Directorate of Facilities
Engineering

Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Thank you for the opportunity to comment on the EIS Preparation Notice. The following comments are offered:

a. All federal military lands within the designated area should be identified as such. Mokuleia Army Beach and Dillingham Army Airfield are Army property.

b. This office would like to receive a copy of the Draft EIS when it is available.

c. Any detailed site development plans within the area should be submitted to this office for review to determine if there is any conflict with the U.S. Army’s use of its lands.

The point of contact with this office is Daniel Bow, AP2V-P2E-P, 655-0779.

Sincerely,

[Signature]
Joseph S. Wasielewski
Colonel, Corps of Engineers
Director of Facilities Engineering

Enclosure

Rec’d 10-31-86
November 18, 1986

Colonel Joseph Wasielewski
Director of Facilities Engineering
Corps of Engineers
Dunning Hall
Fort Shafter, Hawaii 96858-5000

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Col. Wasielewski:

Thank you for your comments dated October 23, 1986 on the subject prep notice. We respond as follows:

a. Federal Property Ownership

Federal ownership of Dillingham Air Field and Mokuleia Army Beach will be indicated in the Draft EIS.

b. Draft EIS

A copy of the Draft EIS will be provided to your office when it becomes available.

c. Submittal of Detailed Site Maps

The General Plan amendment for designation of Mokuleia as a Secondary Resort Area is not site- or project-specific. Specific impacts of proposed developments will be reviewed under the City & County of Honolulu's Development Plan process.

Again, thank you for your comments.

Sincerely,

[Signature]
Barry R. Okuda
BRO:awp
Mr. Barry R. Okuda
C/O Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, HI 96813

November 7, 1986

Dear Mr. Okuda:

Subject: EIS Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

We have read the subject preparation notice and have no comments at this time. We would be interested in reviewing project-specific proposals in the future, because the area is primarily agricultural and a significant portion of the area is designated "prime agricultural land".

Thank you for the opportunity to review this document.

Sincerely,

[Signature]
Stratford L. Whitinger
District Conservationist

Rec'd 11-10-86

No Response Required
October 24, 1986

Mr. Barry R. Okuda
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

We have received the Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii. Our comment is the same as the previous notice (see enclosed copy of our letter to you dated June 20, 1986) regarding the assessment of impacts from aircraft noise due to over flights of this area.

Sincerely,

David J. Welhouse
Airport Engineer/Planner

Henry A. Sumida
Airports District Office Manager

Enclosure

10-27-86
June 20, 1986

Mr. Barry R. Okuda
Paulehu Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

We have received the Environmental Impact Statement Preparation Notice transmitted on June 16, 1986, for the proposed development at Hokualea, Waialua, Oahu. Our only comment regards the evaluation of noise impacts. The Notice states that the traffic noise along Farrington Highway will be evaluated, but there is no mention of aircraft noise impacts. Due to the proximity of Dillingham Airfield, the impact from aircraft noise should also be assessed since this area is subject to aircraft over flights.

Sincerely,

[signature]

David J. Welhouse
Airport Engineer/Planner

Henry A. Sumida
Airports District Office Manager

WELHOUSE:csy:6/20/86
November 18, 1986

Mr. David J. Welhouse
Airport Engineer/Planner
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850-0001

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Welhouse:

Thank you for your comments on the subject prep notice. We respond as follows:

The proposed amendment to the General Plan to create a Secondary Resort Area at Mokuleia is not site- or project-specific. The potential for aircraft noise impacts in the Mokuleia area vary significantly as the distance from Dillingham Airfield increases. Specific studies would be appropriate when evaluating a site- or project-specific proposal.

In general, however, the impact of aircraft noise on proposed development could be expected to increase the closer development is located to Dillingham Field. It is anticipated that specific development proposals would have a number of options available to mitigate aircraft noise impacts including the following: providing buffers, location and orientation of buildings, use of sound attenuation techniques in building design and construction.

We believe that the assessment of noise impacts and the development of mitigation measures is more appropriately addressed during the Development Plan amendment process.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
October 21, 1986

Mr. Barry R. Okuda  
c/o Barry R. Okuda, Inc.  
Pauahi Tower, Suite 1900  
1001 Bishop Street  
Honolulu, Hawaii  96813

Subject: City and County of Honolulu General Plan Amendment  
and Environmental Impact Statement Preparation Notice  
(EISPN) for Mokuleia Secondary Resort Area; Waialua,  
Oahu

Dear Mr. Okuda:

The Department of Agriculture has reviewed the subject  
EISPN and offers the following comments.

According to the proposal, the City and County of Honolulu  
General Plan would be amended to include the Mokuleia area as a  
"Secondary Resort Area". This amendment of the General Plan  
would permit resort development of the Mokuleia area after  
acceptance of site-specific Development Plan proposals.

According to our information, one such proposal has been  
submitted previously by the applicant for development of a  
multi-purpose resort on approximately 1,000 acres in the  
Mokuleia area. Our comments (dated July 8, 1986) to the  
Environmental Impact Statement Preparation Notice (EISPN) for  
this resort project are attached. Although no site-specific  
location is offered for the General Plan amendment, we assume  
the proposed amendment and the resort project are related since  
both proposals are from the same applicant.

The Draft Environmental Impact Statement for the General  
Plan amendment to include Mokuleia as a secondary resort area  
should include discussion on the following issues:

Relationship to State Plans and Policies

- How does the proposed amendment conform to the  
  State Agriculture Functional Plan and its objectives  
  and policies, particularly, Implementing Action  
  B(5)(c)?
Mr. Barry Okuda  
October 21, 1986  
Page -2-

- How does the proposed amendment relate to Hawaii State Plan priority guidelines 226-104(b)(2) and 226-106(l), which direct development into marginal or non-essential agricultural land to meet housing needs, and "...(maintain) agricultural lands of importance in the agricultural district"?

- What impact will this amendment have on future agricultural production requirements and expansion of diversified agriculture, as identified in the Final Report of the Land Evaluation and Site Assessment (LESA) Commission (February, 1986)?

- The broader economic and resource impact on the State from the potential, irrevocable loss of prime agricultural lands should be assessed.

- What are the present source(s) and potential alternative uses of agricultural irrigation water in the area, and the impact on agriculture resulting from the withdrawal of water for domestic consumption?

Thank you for the opportunity to comment. We will provide further comment upon our receipt and review of the Draft EIS.

Sincerely,

[Signature]

JACK K. SUWA  
Chairperson, Board of Agriculture

Attachment

cc: Department of General Planning  
LUC  
DPED  
DLU  
QEQC
July 8, 1986

Mr. Barry R. Okuda
C/o Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement Preparation Notice (EISPN) for Mokuleia Development, Waialua, Oahu
TMX: 6-8-02: 1, 6, 10, 14
       6-8-03: 5, 6, 11, 15, 16, 17, 19, 20, 30,
               31, 33, 34, 35, 38, 39 and 40
       6-8-08: 22
Acres: 2887.2

The Department of Agriculture has reviewed the subject EISPN and offers the following comments.

According to the EISPN, the Mokuleia Development Corporation is proposing a multi-purpose resort comprised of commercial, residential, and recreational developments utilizing 1,019 acres of the 2,887.2 acre total project site. The proposed development is situated on five sites identified as Parcels "A", "B", "C", "D" and "E". The latter four Parcels are situated makai of Farrington Highway. According to our information, Parcel "A" has been used for grazing and is bordered to the east and west by sugarcane fields.

The EISPN mentions some of the Soil Conservation Service (SCS) Soil Service soil series found on the five parcels. A full description of all the applicable SCS soil types should be included in the Draft EIS along with similar references to the Land Study Bureau Detailed Land Classification for Oahu (1972), and the Agricultural Lands of Importance to the State of Hawaii (ALISH) system (1972). The following classification system should also be considered in the Draft EIS.
LAND EVALUATION AND SITE ASSESSMENT SYSTEM

The Hawaii State Constitution requires the State to provide standards and criteria to conserve and protect agricultural lands, promote diversified agriculture, increase agricultural self-sufficiency and assure the availability of agriculturally suitable lands. The Constitution also provides for the identification of "important agricultural lands". Once identified, these lands may be reclassified or rezoned only after meeting the criteria established by the State Legislature and approved by two-thirds vote of the body responsible for the reclassification or rezoning action.

The Land Evaluation and Site Assessment (LESA) Commission was assigned the task of identifying and recommending, for adoption by the Legislature, a system to identify important agricultural lands (IAL). The recommendations of the Commission, if approved by the Legislature, would carry out the Constitutional mandate to protect important agricultural lands.

From the illustrative maps (1:24,000 scale) which apply the IAL methodology as part of the work of the LESA Commission, nearly all of the area identified as Parcel A(1) (approximately 890 acres) is within the illustrative "Important Agricultural Land" (IAL) boundary as defined by the LESA Commission ("A Report on the State of Hawaii Land Evaluation and Site Assessment System", February 1986). The IAL are lands capable of producing high agricultural yields, lands which produce commodities for export and local consumption, lands not currently in production but needed to attain desired projected levels of agricultural activities and income, and lands designated by public policies as important agricultural lands resulting from some unique quality, setting or use.

The Parcel A(1) site has Land Evaluation (LE) ratings of 71, 77, 79, 83, 86 and 94 on a scale of 12 to 96 (Land Evaluation Data with Weighted LE Rating - Oahu; Exhibit A; LESA Commission Report). Briefly, the LE ratings represent the physical characteristics of the soil resources of Hawaii. The LE ratings are a composite of the Soil Conservation Service Soil Survey, Land Study Bureau Detailed Land Classification, and the Agricultural Lands of Importance to the State of Hawaii system. Site Assessment (SA) factors or criteria which express the relative quality of a site or area based upon its non-physical characteristics, further indicate the agricultural viability of a parcel, site or area.
Mr. Barry R. Okuda
July 8, 1986
Page 3

Although the LESA Commission Report and corresponding legislative bill were not acted upon by the Legislature this past Session, the Department of Agriculture believes that the definition and identification of "Important Agricultural Land" by the methodology proposed by the LESA Commission provides the most comprehensive and rational indication of the relative importance of agricultural lands in the State.

OTHER ISSUES

The Draft EIS should include discussion on the following issues:

- the effect of the proposed development on the ongoing cultivation of sugarcane in fields adjacent to the portion of the project on the mauka side of Farrington Highway;

- Chapter 165 of the Hawaii Revised Statutes, which limits the circumstances under which existing farming operations may be deemed a nuisance;

- the broader economic and resource impact on the State from the irrevocable loss of approximately 890 acres of prime agricultural lands;

- a description of the existing agricultural use on the subject parcels and the potential of establishing viable alternative agricultural uses on the project site;

- the impact on agriculture in the surrounding area resulting from the withdrawal from the Waialua Groundwater Control Area of 2.1 million gallons per day of potable water and an unstated amount of lesser quality irrigation water for the golf courses;

- the relationship of the proposed development to existing and other urban developments in the North Shore Development Plan area;

- how the proposed project conforms to the State Agriculture Functional Plan and its objectives and policies, particularly, Implementing Action B(5)(c);
Mr. Barry R. Okuda  
July 8, 1986  
Page -4-  

We will provide further comment upon our receipt and review of the Draft EIS.

Sincerely,

[Signature]

JACK K. SUWA  
Chairman, Board of Agriculture

cc: DPED  
DLU  
DGP  
OEQC
November 18, 1986

Mr. Jack Suwa  
Chairperson, Board of Agriculture  
P.O. Box 22159  
Honolulu, Hawaii  96822-0159

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Suwa:

Thank you for your comments of October 21, 1986 regarding the subject prep notice. We respond as follows:

The Draft EIS for the General Plan amendment to include Mokuleia as a Secondary Resort Area will include discussion of the areas outlined in your letter, including:

--- Conformance with The State Agriculture Functional Plan
--- Hawaii State Plan
--- Impact on the need for agricultural lands in the future
--- Irrevocable loss of prime agricultural land
--- Source of irrigation water in the area

As indicated in your letter, no site-specific resort proposal is included as part of the General Plan amendment proposal, but would be considered as site-specific Development Plan proposals. Accordingly, discussion of the agricultural impact must at this time be general in nature. The Mokuleia area contains a wide variety of land uses, although agriculture is the primary land use. A number of the questions posed in your letter could best be answered at the site/proposal-specific Development Plan level.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO: awp
October 29, 1986

Mr. Barry R. Okuda
C/o Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop St.
Honolulu, HI 96813

Dear Mr. Okuda:

SUBJECT: EIS for Proposed Secondary Resort Area
Designation at Mokuleia

Due to a lack of specific information in the EIS Preparation Notice, the degree of enrollment impact on our schools could not be assessed at this time. May we reserve our comments until a later date when more development data regarding the type and number of housing units proposed are available.

Should you have any questions, please call Mr. Richard Inouye at 737-4743.

Sincerely,

[Signature]

Francis M. Hatanaka
Superintendent

FMH:dk
cc: Central Dist. OBS

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER
BARRY R. OKUDA, INC.

November 18, 1986

Mr. Francis Hatanaka
Superintendent
Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804

Re: Environmental Impact Statement Preparation Notice for
    Proposed Secondary Resort Area Designation at Mokuleia,
    Oahu, Hawaii

Dear Mr. Hatanaka:

Thank you for your comments dated October 29, 1986 on the subject
prep notice. We respond as follows:

The General Plan Amendment proposed is not site- or project-
specific and therefore impacts on school enrollment cannot be
determined. When projects are proposed these impacts can be
evaluated during the Development Plan amendment process. The
schools in the Mokuleia area will be discussed in the EIS in
general terms.

Again, thank you for your comments.

Sincerely,

BARRY R. OKUDA

BRO: awp
November 10, 1986

Mr. Barry R. Okuda, President
C/O Barry R. Okuda, Inc.
1001 Bishop St.
Pauahi Tower, Suite 1900
Honolulu, Hawaii 96813

Subject: EIS Preparation Notice for Proposed General Plan Amendment - Mokuleia As A Secondary Resort Area

Thank you for allowing us to review and comment on the subject EIS preparation notice. We provide the following comments:

Wastewater Disposal

There are no public sewerage system serving the area. In the absence of such a system, some means of disposing domestic sewage will have to be designed and implemented either by use of private sewage treatment plants or individual wastewater systems. Because of the presence of existing potable and non-potable water wells scattered throughout the proposed site, the potential health impacts can only be addressed when a site-specific proposal is submitted for our review.

The proposed project is located in a 201 Facility Plan planning area. The developer should connect the sewage flows from the project to the proposed Waialua-Haleiwa Wastewater Treatment Plant (WWTP). Because of the presence of existing potable and non-potable water wells scattered throughout the proposed site, the potential health impacts from any interim sewage disposal system, prior to the proposed Waialua-Haleiwa WWTP, can only be addressed when a site-specific proposal is submitted for our review.

Noise

1. Subject to the type and nature of the resort development, noise from activities associated with such facility may have an adverse effect on residential communities. The following potential noise impacts must be addressed when preparing the EIS for the subject project:
   a. Increase in vehicular traffic volume, including tour buses, and vehicles within off-street parking areas.
   b. Activities relating to deliveries of goods and services, including commercial refuse collection.
   c. Activities relating to maintenance work of grounds and facilities.
d. Recreational and entertainment activities.

2. Stationary equipment such as air conditioners, exhaust fans, pumps and compressors must be designed so that noise emanating from such equipment will be in compliance with Title 11, Administrative Rules Chapter 43, Community Noise Control for Oahu.

Sincerely yours,

[Signature]

JAMES K. IKEDA
Deputy Director for
Environmental Health

KSiao

Rec'd 11-17-86
Mr. Leslie S. Matsubara, Director
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Matsubara:

Re: Environmental Impact Statement Preparation
Notice for Proposed Secondary Resort Area
Designation at Mokulua, Oahu, Hawaii

Dear Mr. Matsubara:

Thank you for your comments dated November 10, 1986 on the
subject prep notice. We respond as follows:

Wastewater Disposal

Your comment indicates the necessity for a site specific
proposal in order to evaluate the impacts of development on
wastewater disposal. The draft EIS will address the need for
wastewater treatment facilities in general terms.

Noise

1. Noise impacts are discussed in general in the draft EIS. As
indicated in your comment the nature and type of the resort
development will determine the nature of the potential noise
impacts.

   a. Traffic Noise. The size of the proposed developments as
      well as the infrastructure to be developed will
determine what these impacts will be.

   b. Support Services. The size and nature of the resort
      development would determine what the potential impacts
      from these sources would be.

   c. Grounds and Facilities Maintenance. Maintenance
      requirements and their impact on the noise levels of
      surrounding developments will be determined by the
      specific development proposal.
Noise (continued)

d. Recreational and Entertainment Activities. Noise impacts from these activities will be dependent on the type of activities proposed and their location in relation to other developed areas. A specific proposal is necessary to evaluate the potential impacts.

2. Stationary Equipment

A specific proposal will be necessary to determine the potential noise impacts from these sources.

As the General Plan amendment does not involve a specific development proposal or specific site, the potential wastewater and noise impacts can be discussed only in general terms. This will be done in the draft EIS.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO: awp
Mr. Barry R. Okuda  
c/o Barry R. Okuda, Inc.  
Pauahi Tower  
1001 Bishop Street, Suite 1900  
Honolulu, Hawaii  96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement Preparation Notice (EISPN)  
for Proposed General Plan Amendment, Mokuleia Resort  
Designation, Oahu

We have reviewed the subject EIS preparation notice and recommend  
that the following areas be fully discussed in the EIS. The need for proposed  
resort development on Oahu relative to projected tourism growth, the need for  
additional hotel/resort condominium units, and the existing and proposed  
supply of such units should be reviewed and described in the EIS. Potential  
impacts on the Kahuku resort area should be addressed. The EIS should also  
include discussion of secondary impacts of resort development in this area  
including the need for and availability of employee housing and public  
recreational facilities.

The preparation notice does not describe a site-specific location  
for resort development nor a project-specific proposal. The EIS should  
describe any resort developments proposed for the area since they would  
directly relate to the General Plan and subsequent Development Plan amendments.

The EISPN indicates that the forthcoming EIS will address Hawaii  
Coastal Zone Management (CZM) concerns relating to flora and fauna,  
archaeological resources and other coastal impacts. It should discuss other  
coastal issues of the CZM law, Chapter 205A, Hawaii Revised Statutes, such as  
coastal hazards, recreation, scenic and open space resources, and coastal  
dependency.

The availability of water in the area should be discussed. In 1981  
the Board of Land and Natural Resources designated the Waialua portion of the  
Waialua-Kahuku water use district as a groundwater control area. The Board of  
Water Supply has also classified the Waialua-Haleiwa Water System as a  
"limited additional" water supply area.

The EIS should review the proposed amendment's effect on population  
distribution policies of the General Plan as they apply to both the North  
Shore area and other areas of Oahu. According to the 1985-86 annual review of
the North Shore Development Plan, only modest development proposals could be accommodated within the General Plan's projected population figures. It is estimated that by the year 2005, the North Shore DP area resident population would range from 15,272 to 17,181. The estimated 1984 resident population was 13,937.

An analysis of appropriate objectives, policies and priority guidelines of the Hawaii State Plan and pertinent Functional Plans should be included to review the project's relationship to the Hawaii State Plan. The following sections in the Hawaii Revised Statutes should be included among your selection of relevant sections of the Hawaii State Plan. Sections for objectives and policies include Population (Section 226-5, HRS), Economy (Sections 226-6 through 226-8, HRS), Physical Environment (Sections 226-11 through 226-13, HRS), Facility Systems (Sections 226-14 through 226-18, HRS) and Socio-cultural Advancement (Sections 226-19 through 226-23, HRS). Priority Guidelines' sections include Population Growth and Land Resources (Section 226-104, HRS), Economic (Sections 226-105(a) through (e), HRS), and Affordable Housing (Section 226-103, HRS). The State Functional Plans should be examined to determine relevance to the proposed designation and important relationships should be discussed in the EIS.

Thank you for allowing us the opportunity to provide these comments.

Very truly yours,

[Signature]

Kent M. Keith

cc: Office of Environmental Quality Control
November 18, 1986

Mr. Kent Keith, Director
Department of Planning and
Economic Development
P.O. Box 2359
Honolulu, Hawaii 96804

Re: Environmental Impact Statement Preparation Notice for
Proposed Secondary Resort Area Designation at Mokuleia,
Oahu, Hawaii

Dear Mr. Keith:

Thank you for your comments dated November 6, 1986 on the subject prep notice. We respond as follows:

The proposed General Plan amendment to designate Mokuleia as a Secondary Resort Area is not site- or project-specific. The purpose of the proposed EIS is to determine the impacts of a change in the General Plan and not impacts that are site- or project-specific. We have reviewed your letter of July 8, 1986 regarding a specific development proposal for the Mokuleia area and find a number of the questions raised in that letter are repeated in the November 6, 1986 letter on the General Plan amendment prep notice. It is our opinion that the issues raised in your November 6, 1986 letter which are site- or project-specific are more properly addressed during the development plan amendment process for which a separate EIS would be required.

Economic Issues

Economic issues relating to the need for additional resort development will be discussed in the Draft EIS. Those issues that relate to specific proposals, i.e., those which require specific information as to number of jobs generated, increase in population and need for additional housing, require specific information not under consideration at the General Plan level.
Specific Proposals

As indicated above specific proposals should be considered during the Development Plan amendment process following approval of the subject General Plan amendment.

Coastal Issues

A full range of coastal issues will be discussed in the Draft EIS.

Water

Water will be addressed in the Draft EIS.

Population

The proposed General Plan amendment is not site- or project-specific and therefore no determination can be made as to the impact on population--residential or tourist--at this time. These issues will be addressed at the development plan level.

Government Plans

A full discussion of the proposed change and its impact or compliance with other government plans will be included in the Draft EIS.

Thank you for your interest in the proposal.

Sincerely,

Barry R. Okuda

BRO:awp
Mr. Barry R. Okuda  
c/o Barry R. Okuda, Inc.  
Suite 1900, Puaahi Tower  
1001 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: EIS Preparation Notice for the Proposed General Plan Amendment to Designate Mokuleia as a Secondary Resort Area

The Hawaii Housing Authority has no comments to offer at this time. However, we wish to be a consulted party during the preparation of this Environmental Impact Statement.

Sincerely,

[Signature]

RUSSELL N. FUKUMOTO  
Executive Director

Rec'd 10-24-86

No Response Required
November 3, 1986

Mr. Barry R. Okuda, President
Barry R. Okuda, Inc.
1001 Bishop Street, Suite 1900
Honolulu, Hawaii 96813

Dear Mr. Okuda:

EIS Preparation Notice - Proposed General Plan Amendment to designate Mokuleia, Oahu as a Secondary Resort Area

Thank you for including the Department of Transportation as one of the agencies to be consulted in preparation of the EIS. In order that the DOT may adequately assess the proposed amendment, the following areas of concern need to be addressed by the EIS:


2. Air Traffic. The presence of Dillingham Field within the subject area requires a thorough noise and land use compatibility analysis.

3. Ocean Related Commercial and Recreational Activities. The area includes a substantial shoreline region that needs a comprehensive impact assessment of existing and future recreational as well as commercial ocean related activities.

We appreciate your efforts in keeping us apprised on this matter.

Very truly yours,

Wayne J. Yamashita
Director of Transportation

Kc'd 11-13-86
November 18, 1986

Mr. Wayne Yamasaki, Director
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Yamasaki:

Thank you for your comments dated November 3, 1986 on the subject prep notice. We respond as follows:

1. Vehicular Traffic

The Draft EIS will contain a discussion of roadway infrastructure existing in the area today. The proposed amendment to designate Mokuleia as a Secondary Resort Area is not site- or project-specific. Without the knowledge of what might be proposed for specific resort developments in terms of number of units, anticipated population—resident or visitor—there is not enough information available to make a Traffic Impact Analysis Report (TIAR). This information will be available at the Development Plan level of review.

2. Air Traffic

The area under consideration for designation as a Secondary Resort Area contains thousands of acres located at various distances from the air field. Without a specific site proposal with land use designations which could be overlain with noise contours, it is not possible to evaluate specific impacts and identify mitigating measures. A more appropriate time to evaluate the impacts of aircraft operations would be during the Development Plan process where specific locations and land use proposals would be available for review.
3. **Ocean Related Commercial and Recreational Activities**

The Draft EIS discusses the existing and future recreational resources of the area. There are no known commercial ocean related activities conducted in the area. (Note: Activities of a commercial nature conducted at the Episcopal Church Camp have been assumed to be recreational in nature.) Sport fishing, to a limited extent commercial, is conducted out of Haleiwa Harbor; little or no impact on this activity is anticipated. Some ocean related commercial activities might develop as a result of resort development; these activities would be dependent on specific development proposals.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
28 October 1986

Mr. Barry R. Okuda
C/O Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii, October 1986

We have reviewed the subject EISPN and have no comment to offer at this time. Thank you for the opportunity to comment. This material was reviewed by WRRC personnel.

Sincerely,

Edwin T. Murabayashi
EIS Coordinator

ETM:jm

Rec'd 11-3-86

No Response Required
October 31, 1986

Mr. Barry R. Okuda, President
Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Your Letter of October 8, 1986 on the Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Thank you for consulting with us on the proposed General Plan Amendment to designate Mokuleia as a secondary resort area. We have the following comments on the project:

1. A water master plan for any proposed resort development should be submitted for our review and approval. The water master plan should include provisions for a new source, reservoir, and pipelines to accommodate the development. These facilities should be designed and constructed in accordance with the requirements of our Water System Standards.

2. Most of the Mokuleia area is designated as a "No-Pass" zone where ground disposal of wastewaters from new developments is not permitted.
3. Mokuleia is in a Designated Groundwater Control Area where any ground water development is regulated by the Department of Land and Natural Resources, State of Hawaii. Therefore, developers must obtain permits to drill and withdraw water from that agency.

If you have any questions, please contact Lawrence Whang at 527-6138.

Very truly yours,

Kazu Hayashida
Manager and Chief Engineer

Received 11-5-86
November 18, 1986

Mr. Kazu Hayashida
Manager and Chief Engineer
Board of Water Supply
630 South Beretania Street
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for
Proposed Secondary Resort Area Designation at Mokuleia,
Oahu, Hawaii

Dear Mr. Hayashida:

Thank you for your comments of October 31, 1986 on the subject
prep notice. We respond as follows:

The proposed General Plan Designation of Mokuleia as a secondary
resort area is not site- or proposal-specific, therefore it is
not possible to develop and submit specifics to the Board of
Water Supply for review and approval. With respect to the
comments raised in your letter, however, the Draft EIS will
discuss in general the need for resort development proposals to
include water facilities as part of their infrastructure. There
is also a discussion of the need to provide sewage treatment and
disposal facilities for any proposed development. A discussion
of the Waialua Water Control Area administered by the Department
of Land and Natural Resources is included.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
October 23, 1986

Mr. Barry R. Okuda
c/o Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Mokuleia Development
EIS Preparation Notice

The proposed development would affect the existing access road to the State's Mokuleia Radio site where the City's radio equipment are located. We request that an adequate access road to the radio site be provided and the road easement be granted to the State.

Thank you for the opportunity to comment on the subject development.

Very truly yours,

HERBERT K. MURAOKA
Director and Building Superintendent

cc: J. Harada

Pic'd 10-28-86
November 18, 1986

Mr. Herbert Muraoka, Director
Building Department
650 South King Street
Honolulu, Hawaii  96813

Re: Environmental Impact Statement Preparation Notice for
Proposed Secondary Resort Area Designation at Mokuleia,
Oahu, Hawaii

Dear Mr. Muraoka:

Thank you for your comments of October 23, 1986 regarding the
subject prep notice. We respond as follows:

The proposed General Plan designation of a Secondary Resort Area
at Mokuleia is not site- or project-specific and therefore will
not necessarily impact on the City's existing access road to the
State's Mokuleia radio site. Site- and proposal-specific impacts
would be evaluated during the Development Plan process following
the approval of the General Plan amendment.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
Mr. Barry R. Okuda  
Barry R. Okuda, Inc.  
1001 Bishop Street  
Pauahi Tower, Suite 1900  
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: EIS Preparation Notice  
Project: Mokuleia as a Secondary Resort Area  
Applicant: Mokuleia Development Corporation  
Development Plan: Agriculture, Preservation and Urban Designation  
Zoning Map: Agriculture, Preservation and Urban Use

We appreciate the opportunity to comment on the preparation notice for Mokuleia as a secondary resort project. However, since the project does not involve a site specific location, our comments will be of a general nature.

A development as extensive as this would have a significant impact on public facilities/utilities and should be designed to minimize the negative aspects of this impact as much as possible (i.e., sewer, water, drainage, traffic, etc.). The creation of additional jobs will help stimulate job opportunities for residents in the North Shore area. This should help alleviate the unemployment situation somewhat over the future years. In this regard, the potential employees will require housing and the preparation notice should indicate where the affordable units are to be provided.

As a condition to the approval of the zone change to the proposed housing use, we recommend that the developer be requested to set aside 10 percent of the units proceed within the range of the low- and moderate-income families, or contribute in kind in the development of low/moderate housing acceptable to DHCD. We would welcome the opportunity to assist the developer in formulating a program to provide these units. Please have the developer contact Mr. James Miyagi at 825-4264.

Sincerely,

[Signature]

for MIKE MOON

Rec'd 10-31-86
November 18, 1986

Mr. Michael Moon, Director
Department of Housing and
Community Development
650 South King Street
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for
Proposed Secondary Resort Area Designation at Mokuleia,
Oahu, Hawaii

Dear Mr. Moon:

Thank you for your comments of October 23, 1986 regarding the
subject prep notice. We respond as follows:

The proposed General Plan designation of Mokuleia as a secondary
resort area is not site- or proposal-specific. As indicated in
your letter, this fact limits discussion to general matters. The
Draft EIS will discuss the items referred to in your letter,
i.e., sewer, water, drainage and traffic, as well as economic
impacts such as job creation. Without a specific proposal to
evaluate, it is not possible to comment on a provision for low
and moderate income housing. As your letter indicates a housing
program will be necessary at the time a specific project receives
zoning approval.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO: awp
October 29, 1986

Mr. Barry R. Okuda
Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement Preparation Notice for General Plan Amendment - Waialua
Tax Map Key 6-8-02, 03 and 08

The type and size of the proposed Mokuleia Development is significant and the recreational system to serve the residential and resort needs of the project should be adequately planned. The project will be required to comply with two City Ordinances. These are the Park Dedication Ordinance No. 4621 and the Public Access Ordinance No. 4311. The standards and requirements of these ordinances are clearly defined and should be a guide in planning the recreational system of the project.

Should you have any question in regards to these ordinances, please call Mr. Jason Yuen of our Advance Planning Section at 527-6315.

Sincerely,

[Signature]

TOM T. NEKOTA, Director

TTN:ei

Read 11-3-86
November 18, 1986

Mr. Tom Nekota, Director
Department of Parks and Recreation
650 South King Street
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Nekota:

Thank you for your comments of October 29, 1986 on the subject prep notice. We respond as follows:

The proposed designation of Mokuleia as a secondary resort area on the General Plan is not site- or project-specific. Without a site-specific proposal it is not possible to determine the applicability of Park Dedication Ordinance No. 4621 or Public Access Ordinance No. 4311. The Draft EIS for amendment of the General Plan will discuss these ordinances only in general terms. Following approval of the General Plan amendment, site-specific proposals will be evaluated for compliance with the above mentioned ordinances in the Development Plan process.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
October 21, 1986

Mr. Barry R. Okuda  
c/o Barry R. Okuda, Inc.  
Suite 1900, Pauahi Tower  
1001 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation At Mokuleia, Oahu, Hawaii

We have reviewed the material submitted and do not have any objections to the proposed change to the General Plan which would add the area of Mokuleia as a Secondary Resort Area.

Thank you for giving us the opportunity to review and comment on the proposed project.

Sincerely,

[Signature]
Douglas G. Grib
Chief of Police

No Response Required
October 14, 1986

Mr. Barry R. Okuda
Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Re: EISPNI, Proposed Secondary Resort Area
Designation at Mokuleia, Oahu, Hawaii

In response to your request for comments on the subject matter, there are no municipal drainage and sewer improvements in the area proposed for secondary resort area.

Very truly yours,

RUSSELL L. SMITH, JR.
Director and Chief Engineer

[Signature]

Res’8 10-16-86
BARRY R. OKUDA, INC.

BARRY R. OKUDA
PRESIDENT

November 18, 1986

Mr. Russell L. Smith
Director & Chief Engineer
Department of Public Works
650 South King Street
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Smith:

Thank you for your comments dated October 14, 1986 on the subject prep notice. We respond as follows:

1. Drainage

The designation of a secondary resort area in Mokuleia is not site- or project-specific and therefore evaluating the drainage impacts and mitigating measures (drainage improvements) would not be appropriate at this time.

Specific proposals under the Development Plan review process would include an analysis of drainage impact and would consider existence or lack of municipal drainage improvements in the area. Proposals to improve the drainage system would mitigate these concerns.

2. Sewers

The lack of a sewer system in the area proposed for resort designation will be discussed in the Draft EIS. A sewer system will be a necessary part of resort infrastructure. The alternatives for accomplishing the necessary improvements will be discussed in the Draft EIS.

Again, thank you for your comments; we look forward to your review and comment on the Draft EIS.

Sincerely,

Barry R. Okuda

BRO:awp
October 24, 1986

Mr. Barry R. Okuda
C/O Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement Preparation Notice
Mokuleia Secondary Resort Area

This is in response to your request of October 8, 1986, regarding
the preparation of an Environmental Impact Statement for the
Mokuleia Secondary Resort project.

We recommend that a traffic study be conducted to assess the
traffic impact of the proposed project on the surrounding area.
The traffic study should address the following transportation
cconcerns:

1. The amount of traffic to be generated by the project and its
   impact on the surrounding streets. A capacity analysis for
   the critical intersections near the project is necessary for
   the morning and afternoon peak hours.

2. The traffic impact of the project on the arterial system that
   will be affected.

3. The need for street improvements on the surrounding street
   system to support the proposed use.

4. The impact of the project on the City's bus service to the
   area.

Sincerely,

[Signature]

[Date] 10-30-86
November 18, 1986

Mr. John H. Hirten, Director
Department of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Hirten:

Thank you for your comments of October 24, 1986 on the subject prep notice. We respond as follows:

The General Plan amendment to designate Mokuleia as a Secondary Resort Area is not site- or proposal-specific. It is not possible to evaluate traffic impacts of resort development in the area unless factors such as location and size (units, population) are determined. Existing traffic conditions and highway infrastructure in the area will be discussed in the EIS. Proposal/site-specific impacts must be considered during the Development Plan amendment process.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
October 23, 1986

Mr. Barry R. Okuda
c/o Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Subject: Environmental Impact Statement (EIS) Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

We have reviewed the above EIS Preparation Notice and offer the following comments:

HECO has an extensive electrical transmission and distribution system in the area of our Waialua Substation. The impact on these facilities will not be known until more definitive requirements for electrical service are set forth in the EIS.

Sincerely,

Brenner Munger

/10-27-86/
November 18, 1986

Brenner Munger, Ph.D., P.E.
Manager, Environmental Development
Hawaiian Electric Co.
P.O. Box 2750
Honolulu, Hawaii 96840-0001

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Munger:

Thank you for your comments of October 23, 1986 regarding the subject prep notice. We respond as follows:

The proposed secondary resort designation for the Mokuleia area is not site- or project-specific and therefore defining electrical service requirements at this time is not possible. Resort development will require increased levels of service. The public review process for such specific proposals will offer adequate detail and lead time for the developer, public agencies and HECO to mitigate any potential impacts on electric utility service.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda
BRO:awp
October 31, 1986

Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Barry Okuda:

Environmental Impact Statement Preparation
For the Proposed Secondary Resort Area
Designation at Mokuleia, Oahu, Hawaii

We have reviewed the Environmental Impact Statement Preparation for
the proposed Secondary Resort Area Designation at Mokuleia, Oahu,
and find that the proposed development should not have any adverse
environmental effect on our existing telecommunication facilities nor
do we foresee any problems in providing telecommunication services to
the proposed site as the area is developed.

Thank you for the opportunity to comment on this proposal. If you
have any questions, please call me at 546-3464.

Sincerely,

Walter M. Matsumoto
Oahu Engineering &
Construction Manager

Rec'd 11-7-86

No Response Required
October 14, 1986

Barry A. Obuda
Barry A. Obuda Inc.
Pauahi Tower Suite 1000
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Obuda:

Please consider the Kahaluu Coalition a consulted party in the preparation of the Environmental Impact Statement for the proposed Secondary Resort Area Designation at Makahaia, Oahu requested by the Makahaia Development Corporation, a subsidiary of the Northwestern Mutual Life Insurance Company.

Thank you,

Edwin Stevens, 1st Vice President
The Kahaluu Coalition

Rec'd 10-17-86
November 18, 1986

Mr. Edwin Stevens
First Vice President
Kahaluu Coalition
47-232 Waihee Road
Kahaluu, Hawaii 96744

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Stevens:

The Kahaluu Coalition is considered a consulted party. We look forward to your review and comment during the EIS process.

Sincerely,

Barry R. Okuda
BRO:awp
October 14, 1986

Mr. Barry R. Okuda  
c/o Barry R. Okuda, Inc.  
Suit 1900, Pauahi Tower  
1001 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Okuda:

SUBJECT: E. I. A. Preparation Notice  
for Proposed Secondary Resort Area  
Designation at Mokuleia, Oahu, Hawaii

Thank you for including our community in your EIA Preparation Notice. We would appreciate receiving a copy of the Environmental Impact Statement to permit us to more closely scrutinize the proposed project and its impact on the surrounding communities.

Very truly yours,

Donald Hurlbut  
President

DH:ap  
Rec'd 10-16-86

cc: Randy Iwase
November 18, 1986

Mr. Donald Hurlbut, President
Kahuku Community Association
General Delivery
P.O. Box 739
Kahuku, Hawaii 96731

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Hurlbut:

Thank you for your letter of October 14, 1986 regarding the subject prep notice. We respond as follows:

A copy of the Draft EIS will be forwarded to the Kahuku Community Association for review and comment as soon as it is completed.

Again, thank you for your letter and we look forward to your review of the Draft EIS.

Sincerely,

Barry R. Okuda

BRO: awp
TO: Barry R. Okuda  
Barry R. Okuda, Inc.  
Pauahi Tower, Suite 1900  
1001 Bishop Street  
Honolulu, Hawaii 96813

Life of the Land would like to be a consulted party for the Proposed Secondary Resort Area Designation at Mokuleia, Oahu, as announced in the OEQC Bulletin on October 8, 1986.

Thank you very much.

Very respectfully yours,

FRED PAUL BENCO  
Director

FPB/yf
cc: OEQC

Rec'd 11-7-86
November 18, 1986

Mr. Fred Paul Benco
Director
Life of the Land
250 S. Hotel Street, Room 211
Honolulu, Hawaii 96813

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Mr. Benco:

Thank you for your letter of November 7, 1986 regarding the subject prep notice. We respond as follows:

Life of the Land is considered a consulted party for the Proposed Secondary Resort Area Designation at Mokuleia, Oahu. Our records indicate that Life of the Land was sent a copy of the prep notice on October 8, 1986. We look forward to comments from your organization during the EIS process.

Thank you for your interest in the proposal.

Sincerely,

Barry R. Okuda

BRO:awp
November 6, 1986

Barry R. Okuda
C/o Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE FOR MOKULEIA, OAHU, HAWAII

Dear Mr. Okuda:

The North Shore Neighborhood Board (NSNB) No. 27 is included in the agencies and community organizations to be consulted in the preparation of an Environmental Impact Statement (EIS) by Barry R. Okuda, Inc. for Mokuleia Development Corporation.

Mokuleia Development Corporation (MDC) is applying for "a change to the General Plan that would add the area of Mokuleia as a Secondary Resort Area under Objective B., Policy 6 of the Economic Activity area of concern."

It has been the observation of this Board that any EIS prepared by consultants invariably present a viewpoint favorable to the client for whom the EIS is prepared. Further, material submitted by organizations such as the NSNB is buried in the back of the EIS and more often than not, is not addressed in the EIS.

The matter of the subject preparation notice was discussed at the regular meeting of the NSNB on October 28, 1986. The Board members were impressed that they were being asked to consider impacts on the area and the community of an unknown activity since it is not established, at this time, what Mokuleia Development Corporation is planning.

The Board knows that the Mokuleia area is basically agricultural except for the shoreline area which is residential. Development of any new activity will adversely impact existing activities. Resort activities will find sugar cane growing and harvesting incompatible with their expectations and unnecessary friction may develop. An example is the operation of the Hawaiian Commercial and Sugar Company (HC&S) on Maui and their downwind neighbors at Kihei.

Plantation activities include plowing, planting (dusty), aerial spraying for weed control (noisy), cane burning (falling ash from fires both near and afar) and harvesting (dusty and noisy). A principal cane haul road crosses the center of subject site.

The operation of the Dillingham Airfield is expanding as a general aviation reliever airport. Resort operations under aircraft flight paths may be unwise and may lead to later objections by the resort.
North Shore Neighborhood Board No. 27
Barry R. Okuda, Inc.
November 6, 1986
Page 2

The Board members have been told that flora in subject area are on the endangered list. We also understand there are archaeological sites that could be impacted.

The subject area may include lands adjacent to the Kaena State Park and may better be included in those lands. It is known that at one time the shoreline at the mouth of the Makalena Stream was being considered for inclusion in the City park system. It is one of our rare sandy beaches.

We know nothing of proposed waste disposal, solid or sewage at subject site but are aware both already are problems on the North Shore. We hear complaints from Mokuleia residents about cesspool leachate into the nearshore waters and objections from residents to a planned sewage treatment plant designed to correct the problem. We do not need a General Plan amendment that will aggravate this.

A single two-way highway, Farrington Highway, serves the Mokuleia area. We can envision a serious traffic impact if the area were to be a resort. For the portion that would be in the tsunami evacuation area, congestion could be dangerous and a situation for which the city might be liable.

Having gone through years of discussion, consideration, on site visiting, impact consideration with the developers of the Kuliama resort, this Board is waiting and watching hopefully that the development will be carried out as the community wishes and the developers promise. We also want to see the final results of this new resort on the community before we designate another resort area.

Whether or not it is unfair to seek deferment of another development in this area, the members of the NSNB recommend denial of the proposed amendment to the General Plan because the negative impacts outweigh the positive impacts, at this time.

We thank you for the opportunity for the NSNB to submit its recommendations.

Most sincerely,

Meryl M. Andersen
Chairperson 2ND

cc: Donald Clegg, DGP
Councilmember Randall Iwase
Neighborhood Commission

Lee'd 11-10-86
November 18, 1986

Mrs. Meryl Andersen
Chairperson
North Shore Neighborhood
Board No. 27
P.O. Box 607
Haleiwa, Hawaii 96712

Re: Environmental Impact Statement Preparation
Notice for Proposed Secondary Resort Area
Designation at Mokuleia, Oahu, Hawaii

Dear Mrs. Andersen:

Thank you for your comments dated November 6, 1986 on the subject prep notice. As a general response to your letter, we should emphasize that this EIS deals only with the proposed General Plan Amendment which would designate Mokuleia as a secondary resort area and does not refer to any specific project. A separate EIS would be required for any specific development proposed as part of the Development Plan Amendment process.

Consideration of Unknown Impacts

Please note the explanation of the General Plan Amendment EIS process as discussed in the Mokuleia Development Corporation letter dated November 6, 1986 to the North Shore Neighborhood Board (copy attached).

Agricultural Impacts

Comments relating to the disruption of existing agricultural activities are more appropriately addressed during the Development Plan Amendment process where site- and project-specific proposals are considered. Adverse impacts and mitigating measures can be specifically addressed at that time. The General Plan Amendment proposal to designate Mokuleia as a secondary resort area will discuss potential impacts relative to the agricultural industry.
Aircraft Operations

The impact of aircraft operations on the area proposed for a secondary resort designation varies. Site- and proposal-specific considerations will be evaluated at the Development Plan stage. A general discussion of noise impacts in the Mokuleia area will be part of the Draft EIS.

Flora, Fauna and Archaeological Sites

The EIS will contain a general discussion of flora, fauna and archaeological conditions in the Mokuleia area. Without a specific project to evaluate, however, specific impacts and mitigating measures cannot be identified.

Park Lands

The proposed General Plan Amendment is not site- or project-specific. The impact of future resort development on specific sites is more appropriately discussed at the Development Plan level where proposed projects can be evaluated.

Wastewater/Sewerage Disposal

The Draft EIS will discuss the necessity for including adequate sewage disposal in the infrastructure of any resort to be developed. Details of such a new system would be part of a specific project proposal. It would seem that rather than aggravating a bad existing situation, resort development will help alleviate the problem.

Traffic Impacts

The Draft EIS will discuss existing traffic conditions. The impact of a resort development on those conditions requires information such as number of units, anticipated visitor and resident populations, etc. These evaluations are more properly conducted at the Development Plan level when specific development impacts and mitigating measures can be considered.
Timing of Proposed Amendment

The Board believes it should be given an opportunity to observe the development of the Kualima project prior to deciding to support a change in the General Plan that would designate Mokuleia as a secondary resort. The approval of this General Plan change is the first of many approvals required to implement any resort use in Mokuleia. Deferring action effectively precludes the early creation of employment opportunities, both short and long term. In addition, postponing action does nothing towards helping to satisfy future anticipated need for more visitor accommodations.

Board Recommendation

The letter dated November 6, 1986 from Mokuleia Development Corporation to the Board comments on the Board's recommendations.

We look forward to your comments after you have had an opportunity to review the Draft EIS.

Sincerely,

Barry R. Okuda
BRO:awp
November 6, 1986

Mrs. Meryl Andersen
Chairman
North Shore Neighborhood Board
66-003B Kam Highway
Haleiwa, Hawaii 96712

Re: General Plan Amendment for Mokuleia

Dear Mrs. Andersen:

It is my understanding that the North Shore Neighborhood Board met on October 28, 1986 and voted not to favor our development of Mokuleia. While your discussion and action are useful in letting us know of your concerns, it could be perceived that your conclusions and vote were somewhat premature. This is because the General Plan Environmental Impact Statement has not been distributed and we would appreciate the opportunity to discuss the facts therein with your Board after it has been distributed.

Since your meeting, I have discussed the so-called November 8, 1986 deadline with some members of your Board, and there apparently is some confusion as to what is required by the Office of Environmental Quality Control Preparation Notice. The November 8 deadline was only for the purpose of giving the Board advance notice that an Environmental Impact Statement (EIS) will be prepared, inviting the Board to submit its comments as to what issues or concerns should be addressed in the EIS, before it is written. After the Draft EIS is prepared, a copy will be sent to the Board, and again, the Board will be asked for its comments.

As you know, the City and County is reviewing the General Plan to see whether its resort policies should be amended to add Mokuleia as a secondary resort area. We understand that the Department of General Planning will soon be officially notifying the Board of the amendment, and asking for its comments on it by January 2, 1987. By that date, the EIS will have been available for some time. As with all General Plan changes, this would be for the Mokuleia corridor and

1001 Bishop Street • Suite 979 • Pacific Tower • Honolulu, Hawaii 96813 • (808) 545-7660
not for a site-specific project within Mokuleia. The General Plan is a statement of long-range social, economic, environmental, and design objectives and policies for the general welfare and prosperity of the people of Oahu. It is not a land use plan for the development of specific parcels of land.

The development process is a long one. Any resort concept must go through a multi-year process, including the General Plan, the Development Plan, State land use classification, Zoning, and the Shoreline Management Permit. These steps are to ensure public opinion will be heard at key decision-making points.

After my initial meeting with your Neighborhood Board several months ago, we have taken that presentation to a variety of North Shore community groups and individuals, informing them about our recreational development, balanced with community needs. There certainly has been constructive dialogue. Further, we feel the community is developing an understanding for the quality of our proposed development and the social and economic benefits that could accrue to the North Shore.

You mentioned in our recent phone conversation that you have requested presentations from Mokuleia Development’s Bob Jones. One of our early presentations was before your group, and we have been at the stage of informing as many people as possible about our plan and the City’s and State’s schedules as to processing. Many people have not taken a final position at this time because they are still waiting for the information which is usually contained in an EIS. They feel after they have received the pertinent information they will be in a better position to make comments or arrive at conclusions. We, of course, fully intended to meet with your Board when that information became available. It should be noted that the scheduling of preparing the Draft EIS, etc. are set by City and State regulations.

While we do believe the action of your Board was in a sense unnecessary and premature, it does serve a purpose in the process of communication. It tells us of your concerns, which is the dialogue we are seeking. In this way, we can address those concerns and consider modifying the plans for our mutual benefit.
Mrs. Meryl Andersen  
Page 3  
November 6, 1986  

We request that we be allowed the opportunity to update the Board with regard to status of our processing and that we be put on your agenda at the earliest possible date.

In the spirit of wanting to work with the community and within the planning process, thank you for your consideration.

Respectfully,

MOKULEIA DEVELOPMENT CORPORATION

K. Tim Yee, Chairman

KTY:cf

cc: Board Members
November 7, 1986

Mr. Barry R. Okuda
Barry R. Okuda Inc.
Pauahi Tower Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Please consider a request from the Honolulu Group of the Hawaii Chapter of the Sierra Club to be a consulted party in the preparation of the Environmental Impact Statement for the Proposed Secondary Resort Area Designation at Mokuleia, Oahu requested by the Mokuleia Development Corporation, a subsidiary of the Northwestern Mutual Life Insurance Company.

Mahalo

[Signature]

Lola N. Mench
Conservation Committee

Rec'd 11-10-86
November 18, 1986

Ms. Lola Mench,
Conservation Committee
Sierra Club, Hawaii Chapter
Honolulu Group
P.O. Box 11070
Honolulu, Hawaii 96828

Re: Environmental Impact Statement Preparation Notice for Proposed Secondary Resort Area Designation at Mokuleia, Oahu, Hawaii

Dear Ms. Mench:

Thank you for your letter of November 7, 1986 on the subject prep notice. We respond as follows:

The Sierra Club, Hawaii Chapter, Honolulu Group is considered a consulted party to the EIS for the proposed General Plan amendment. Our records indicate that your organization was sent a copy of the prep notice on October 8, 1986 for review and comment. We look forward to input from your organization during the EIS process.

Thank you for your interest in this proposal.

Sincerely,

Barry R. Okuda

BRO:awp
PART XIII

AGENCIES, ORGANIZATIONS AND PERSONS
WHO WERE SENT A COPY OF THE DEIS:
WRITTEN COMMENTS RECEIVED DURING
THE PUBLIC REVIEW PERIOD; AND RESPONSES

The Draft EIS was officially received by the Office of Environmental
Quality Control on November 20, 1986 and was published in the November 23,
1986 OEQC Bulletin. Sixty copies of the DEIS were provided to OEQC; dis-
tribution is shown in Exhibit 19. In addition, the applicant distributed
approximately 40 additional copies of the DEIS to members of the Mokuleia
Advisory Committee and other interested individuals and groups. A total
of 32 letters were received; of this total, 17 contained substantive com-
ments. Starred (*) respondents sent letters regarding the DEIS but did
not provide substantive comments. Double starred (**) respondents pro-
vided comments on the DEIS. All letters and our respective replies are
reproduced in this section.
## Summary of Letters Received and Responses Sent

### Agency Organization

#### Federal
- U.S. Department of Agriculture - Soil Conservation Service (*)
- U.S. Department of Army - Corps of Engineers (*)
- U.S. Department of Interior - Fish and Wildlife (**)
- U.S. Department of Interior - USGS - Water Resources (*)
- U.S. Department of the Navy - Naval Base, Pearl Harbor (*)

#### State
- Department of Accounting and General Services (*)
- Department of Agriculture (**)
- Department of Defense - Air National Guard (*)
- Department of Education (*)
- Department of Health (*)
- Department of Land & Natural Resources (**)
- Department of Planning and Economic Development (**)
- Department of Social Services & Housing - Hawaii Housing Authority (**)
- Department of Transportation (**)
- University of Hawaii - Environmental Center (**)
- University of Hawaii - Water Resources Center (*)

#### City & County
- Board of Water Supply (*)
- Building Department (*)
- Fire Department (*)
- Department of General Planning (**)
- Department of Housing & Community Development (**)
- Department of Land Utilization (**)
- Department of Parks & Recreation (*)
- Department of Public Works (**)
- North Shore Neighborhood Board #27 (**)
- Police Department (**)
- Department of Transportation Services (*)

### Private Organizations and Individuals
- Hawaiian Electric (*)
- Mr. James Lam (**)
- Life of the Land (**)
- Mokuleia Advisory Committee (**)
- Mr. Neil Stoerner (**)

**DISTRIBUTION LIST**

( ) E.A.  
( ) APPLICANT ACTION  
( ) AGENCY ACTION  
( ) EIS  
( ) APPLICANT ACTION  
( ) AGENCY ACTION

**Title:** Proposed General Plan Secondary Resort Area at Mokuleia  
**Location:** Mokuleia, North Shore, Oahu

**Proposing Agency/Applicant:** Northwestern Mutual Life Insurance Co.  
**Accepting Authority/Approving Agency:** City and County of Honolulu Dept. Of General Planning  
**Deadline for Comments:** December 23, 1986  
**Date Sent/By:** NOV 21 1986

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LETTERS RECEIVED
AND
RESPONSES SENT
Mr. Donald A. Clegg  
Chief Planning Officer  
Department of General Planning  
City & County of Honolulu  
650 S. King Street  
Honolulu, HI 96813

Dear Mr. Clegg:

Subject: Draft EIS for the Proposed General Plan, Secondary Resort Area  
Molokai, North Shore District, Oahu, Hawaii

We have reviewed the subject draft environmental impact statement and have no comments to make.

Thank you for the opportunity to review the document.

Sincerely,

[Signature]

RICHARD N. DUNCAN  
State Conservationist

cc:

✓ Mr. Barry R. Okuda  
Barry R. Okuda, Inc.  
Pauahi Tower, Suite 1900  
1001 Bishop St.  
Honolulu, HI 96813

Re: A 3-23-86

No Response Required
Mr. Donald A. Clegg, Director
Department of General Planning
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Thank you for the opportunity to review and comment on the draft EIS for General Plan Secondary Resort Area at Mokuleia. We have no additional comments to our letter dated October 20, 1986.

Sincerely,

[Signature]
Kisuk Cheung
Chief, Engineering Division

No Response Required
Mr. Donald A. Clegg, Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Re: Draft Environmental Impact Statement, Proposed General Plan Amendment, Secondary Resort Area, Mokuleia, Oahu

Dear Mr. Clegg:

We have reviewed the Draft Environmental Impact Statement (EIS) and offer the following comments for your consideration.

General Comments

The proposed General Plan amendment would designate Mokuleia as a Secondary Resort Area. However, the proposed amendment does not involve a site- or project-specific proposal for resort development at Mokuleia. Thus, a complete discussion of potential impacts to fish and wildlife resources from a proposed resort development at Mokuleia is not possible at this time.

Specific Comments

a. Part IV. The Draft EIS does not address wetlands in its description of the environmental setting. There are several wetlands at Mokuleia that provide habitat for endangered Hawaiian waterbirds and migratory waterfowl (see enclosure). Of these wetlands, Crowbar Ranch Pond is listed as a primary habitat (Hawaiian Waterbirds Recovery Plan, U.S. Fish and Wildlife Service, 1985). We recommend that a discussion of wetlands in the project area be included in the Final EIS.

b. Part IV. H. Terrestrial Vertebrates. The Draft EIS should state that the endangered Hawaiian moorhen (Gallinula chloropus sandvicensis) and endangered Hawaiian stilt (Himantopus mexicanus knudseni) use wetlands within the area affected by the proposed amendment.

Save Energy and You Serve America!
We recommend that the wetlands in the project area be surveyed to determine their use by endangered waterbirds and migratory waterfowl. This work should be coordinated with the Division of Forestry and Wildlife and our office. This information will be invaluable for the future planning and siting of this development. My staff will be happy to assist you in planning and conducting these surveys.

Sincerely yours,

Original signed by
Ernest Kosaka
Project Leader
Office of Environmental Services

Enclosure

cc: DLNR
CE, Operations Branch
DLU

ARYuen:pf:9/17/86
B:MOKULEIA.AY (COMPUSTAR-PENNY)
Mr. Barry R. Okuda
Barry R. Okuda, Inc.
Pauahi Tower, Suite 190
1001 Bishop Street
Honolulu, Hawaii 96813

Re: Wetland Map of the Mokuleia Area, Oahu

Dear Mr. Okuda:

Enclosed for your use is a map of wetlands that may be affected by the proposed development at Mokuleia, Oahu (enclosure).

The following is a key to the codes used to describe the wetlands on the attached map:

- **POWX**: palustrine, open water, permanent, excavated.
- **E2US2P**: estuarine, intertidal, unconsolidated shore (sand), irregularly flooded.
- **PEM1CZ**: palustrine, persistent emergent vegetation, seasonal, excavated.
- **PFO3A**: palustrine, broad-leaved evergreen vegetation, temporary.
- **PFO3C**: palustrine, broad-leaved evergreen vegetation, seasonal.
- **R2OW2X**: lower perennial riverine, open water, permanent, excavated.

There is only limited information on the use of these wetlands by endangered waterbirds and migratory waterfowl. The Crowbar Ranch pond is listed as a primary habitat in the Hawaiian Waterbirds Recovery Plan (U.S. Fish and Wildlife Service 1985). Mr. Ralph Saito (Division of Forestry and Wildlife, State Department of Land and Natural Resources) reported gallinule, a listed endangered species, in the marsh areas near the existing polo field. Hawaiian stilt, another listed endangered species, have been observed in the wetland inland from the Dillingham Air Field. The use of the other wetlands in this area by endangered waterbirds and migratory waterfowl is not known since access to these sites is limited.
We appreciate the opportunity to comment.

Sincerely,

[Signature]

Ernest Kosaka
Project Leader
Office of Environmental Services

Enclosure

cc: Mr. Barry R. Okuda
DLNR

Rec'd 12-20-86
January 16, 1987

Mr. Ernest Kosaka
U.S. Department of the Interior
Fish & Wildlife Service
P.O. Box 50167
Honolulu, Hawaii 96850

Re: Comments to DEIS Proposed General Plan Amendment to Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Kosaka:

Thank you for your comments of December 22, 1986 regarding the subject EIS. We respond as follows:

Inclusion of Wetlands in the Environmental Setting

Part IV of the Final EIS will contain a section on Wetlands.

Terrestrial Vertebrates (Part IV.H.)

Part IV.H. will be amended to reflect your comments.

Recommended Survey

We concur that a survey of wetlands areas to determine their use by endangered waterbirds and migratory waterfowl would be useful in future planning. The survey should be conducted at the time that a specific project is being reviewed. The survey can be confined only to the lands impacted by the proposed development.

Again, thank you for your comments.

Sincerely,

BARRY R. OKUDA

BRO:awp
Mr. Donald A. Clegg, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii 96813

Subject: Draft Environmental Impact Statement (DEIS) for Proposed General Plan Secondary Resort Area at Mokuleia

Dear Mr. Clegg:

The Hawaii District office of the U.S. Geological Survey, Water Resources Division, has reviewed the subject DEIS and has no comments at this time. As requested, we have returned the DEIS to the Office of Environmental Quality Control.

Thank you for allowing us to review the DEIS.

Sincerely,

Dan A. Davis
Acting District Chief

Copy to: Barry R. Okuda, Inc.

No Response Required
Mr. Donald A. Clegg
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

DRAFT ENVIRONMENTAL IMPACT STATEMENT
PROPOSED GENERAL PLAN SECONDARY RESORT AREA AT MOKULEIA

The Draft EIS for the Proposed General Plan Secondary Resort Area at Mokuleia has been reviewed and we have no comments. Since we have no further use for the Draft EIS, it is being returned to the Office of Environmental Quality Control.

Thank you for the opportunity to review the Draft.

Sincerely,

T. C. CRANE
Captain, CEC, U.S. Navy
Facilities Engineer
By direction of the Commander

Enclosure

Copy to:
Mr. Barry R. Okuda
Barry R. Okuda, Inc.
Pauahi Tower, Suite 1900
1001 Bishop Street
Honolulu, Hawaii 96813

Office of Environmental Quality Control

No Response Required
Mr. Donald A. Clegg  
Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Subject: General Plan Secondary Resort Area at Mokuleia  
Draft Environmental Impact Statement

We have reviewed the subject document and have no comments to offer.

Very truly yours,

TEUANE TOMINAGA  
State Public Works Engineer

/jnt

No Response Required
MEMORANDUM

To: Mr. Donald A. Clegg, Director
   Department of General Planning
   City and County of Honolulu

Subject: Draft Environmental Impact Statement (DEIS) for
   Proposed General Plan Secondary Resort Area at
   Mokuleia, Oahu

The Department of Agriculture has reviewed the subject DEIS
and offers the following comments.

ADEQUACY OF THE DEIS

Chapter 343, Hawaii Revised Statutes, as well as Section
11-200-1 of Department of Health (DOH) Environmental Impact
Statement Rules, establishes a system of environmental review
"...which will ensure that environmental concerns are given
appropriate consideration in decision making along with economic
and technical considerations". The DEIS states that
"...assessment of the potential impact (on agriculture) of...
...is not designating Mokuleia as a Secondary Resort Area...
...is not site-specific or project-specific..." (DEIS, page IV-16).
Furthermore, the DEIS states that an "...agricultural impact
analysis..." will be necessary at the time of State land use
boundary change (i.e., from the Agricultural to the Urban
District) and when a "...site-specific/project-specific resort
proposal is processed as a Development Plan amendment" (DEIS,
page IV-21). Notwithstanding the petitioner's arguments for not
carrying out a thorough impact assessment in the DEIS, the
Department of Agriculture is of the opinion that an impact
analysis of a more specific nature for the subject proposal is
both proper and possible. We believe that from the standpoint of
agricultural impacts, the DEIS is deficient in meeting the
purpose and intent of Chapter 343 and the DOH Environmental
Impact Statement Rules, Section 11-200-16.
The DEIS should discuss how redesignation of the amendment area to Secondary Resort Area status would affect Economic Activity, Objective C, Policies 2, 4, 5 and 6 of the General Plan, relating to the viability of agriculture on Oahu.

With regard to the impact of the proposed amendment on agricultural activities in the area, the DEIS does not describe in detail the types, number and magnitude of agricultural uses in the vicinity of the amendment area. Yet there are a number of unsubstantiated statements indicating the improbability of adverse impacts on Oahu's or the State's agricultural industry resulting from resort development in the amendment area (DEIS, pages IV-16 to IV-20). Further comment on these statements is made in the following section.

ISSUES THAT NEED TO BE ADDRESSED

The DEIS does not adequately address the concerns found in our comments on the EIS Preparation Notice (DEIS, Part XII, letter of Department of Agriculture to Mr. Barry R. Okuda, dated October 21, 1986), as detailed below.

- **How does the proposed amendment conform to the State Agriculture Functional Plan and its objectives and policies, particularly Implementing Action B(5)(c)?**

Page IX-10 of the DEIS refers to Objective B, Policy 4 of the State Agriculture Functional Plan (SAFP). The DEIS indicates that assessment of adverse impacts resulting from the redesignation of lands from agriculture to other uses will be determined at the level of land use permits necessary at a later stage of development. We believe that an assessment should be done at this stage of General Plan amendment, as noted earlier.

There is no mention in the DEIS of how the proposed amendment conforms to other SAFP Policies or Implementing Actions (especially B(5)(c)). In recognition of the State Constitutional mandate, Implementing Action B(5)(c) states that "Until standards and criteria to conserve and protect important agricultural lands are enacted by the Legislature, important agricultural lands should be classified in the State Agricultural District and zoned for agricultural use, except where, by the preponderance of the evidence presented, injustice or inequity will result or overriding public interest exists to provide such lands for other objectives of the Hawaii State Plan." As seen in Exhibit 12 of the DEIS, most of the proposed Secondary Resort Area is within the illustrative important
agricultural land (IAL) designation as proposed by the Land Evaluation and Site Assessment (LESA) Commission.

- How does the proposed amendment relate to Hawaii State Plan priority guidelines 226-104(b)(2) and 226-106(l), which direct development into marginal or non-essential agricultural lands to meet housing needs, and "...maintain agricultural lands of importance in the agricultural district?"

There is no reference in the DEIS to either priority guideline. As seen in Exhibits 8 through 12 of the DEIS, the proposed amendment area is comprised of lands with qualities conducive to productive agricultural use.

- What impact will this amendment have on future agricultural production requirements and expansion of diversified agriculture, as identified in the Final Report of the Land Evaluation and Site Assessment (LESA) Commission (February, 1986)?

The description of the Land Evaluation and Site Assessment (LESA) Commission and its work provided on pages IV-15 and IV-16 of the DEIS is not at all complete. It is not clear if the definition of "prime agricultural land" as used in the DEIS is comparable to that for "important agricultural land" (IAL) as defined by the LESA Commission.

From Exhibits 8 through 12, it is evident that the subject area contains many of the physical qualities that constitute "prime" agricultural land. However, the Land Study Bureau Detailed Land Classification, the Soil Conservation Service Soil Survey, and the Agricultural Lands of Importance to the State of Hawaii (ALISH) system do not incorporate factors that determine the viability of arable lands for agricultural use. Providing a more comprehensive and quantitative means for determining the quality of Hawaii's land area for viable agricultural use, based on projected demand for agricultural commodities, is the methodology developed by the LESA Commission. The LESAC was assigned the task of identifying and recommending a system for adoption by the Legislature that would comprise standards, criteria and a process to identify important agricultural lands (or IAL). The recommendations of the LESAC and their approval by the Legislature would carry out the State Constitutional mandate (Article XI, Section 3) "...to conserve and protect agricultural lands, promote diversified agriculture, increase
agricultural self-sufficiency and assure the availability of agriculturally suitable lands..."

The LESAC presented its findings to the Thirteenth Legislature in its "Report on the State of Hawaii Land Evaluation and Site Assessment System" (February 1986). The report presents an initial inventory of IAL of the State of Hawaii, the methods by which these lands could be designated and classified, and an amending procedure which could serve to further refine or adjust the classification to meet changing community needs, goals and objectives. Key to the Land Evaluation and Site Assessment (LESA) system, as proposed, is a definition of "important agricultural lands" or IAL that allows quantification.

The illustrative LESA maps for Oahu have a "cutoff" land evaluation (LE) and site assessment (SA) threshold score which results in approximately 57,600 acres of IAL for Oahu (LESAC Report, page 12). The threshold score was selected to result in an acreage figure that would approximate the amount of land projected as necessary to meet the agricultural production goals for Oahu for the year 1995. Based on these goals, a sufficient amount of the most productive and best suited agricultural lands in the State would be classified as "important agricultural lands", and thus receive the attention mandated by the State Constitution (LESAC Report, page 9). From a Statewide perspective, the LESAC Report estimates that approximately 689,000 acres are needed by 1995 (page 12). As of 1983, Oahu had 62,539 acres in agricultural production (LESAC Report, page 14). Excluding grazing and pasture lands and pineapple and sugarcane cultivated lands, 5,310 acres were in what can be considered diversified agricultural activities. By 1995, the acreage in diversified agriculture for Oahu is expected to rise to 10,462 acres for both local consumption and export. Pineapple acreage is expected to remain relatively stable, while sugarcane acreage will decline. Similar trends are expected for the rest of the State.

In the determination and protection of "important agricultural lands", it is the State's duty to assure the availability of agriculturally suitable lands. Therefore, it is appropriate that the State take a conservative, long range view and maintain what appears to be a surplus of productive lands for agriculture. Incremental losses of a resource like arable land, if left uncontrolled, will have a devastating and irreversible cumulative effect on the viability of agriculture.
Once agricultural lands are urbanized there is no return. This cannot be overemphasized.

The broader economic and resource impact on the State from the potential, irrevocable loss of prime agricultural lands should be assessed.

The DEIS states in a "preliminary finding" that "Given the conditions facing Hawaiian agriculture outlined below it is highly doubtful that resort development of a scale comparable with existing or proposed development in areas on Oahu designated as secondary resorts would adversely impact either Oahu's or the State's agricultural industry" (DEIS, pages IV-16 and IV-17). The assertions found on pages IV-17 to IV-20 of the DEIS do not define terms such as "prime agricultural land" and its "availability", "unprofitable (sugar) mills" and, "realistic level...(of) self-sufficiency in produce crops". Also, actual and projected acreage figures, commodity market trends and the statements based thereon are not substantiated, nor are principal sources of information identified. We believe it is unwise to accept the argument in the DEIS that the amount of "available prime agricultural lands" is well beyond the needs of diversified crops today and into the future, without critical and comprehensive evaluation. There is need to maintain an adequate land area for agricultural activities which are considered today as non-viable or marginal, but which may in the future be the equivalent of macadamia nuts and coffee today. A current example is the pending cultivation of cacao on former Puna Sugar Company sugarcane fields. We will be unable to meet the possibility of these new agricultural crops or increased self-sufficiency unless we protect the irreplaceable land resource today from land use decisions that heavily discount or do not consider such possibilities.

- What are the present source(s) and potential alternative uses of agricultural irrigation water in the area, and the impact on agriculture resulting from the withdrawal of water for domestic consumption?

The DEIS indicates that there is a surplus of water (excess of sustainable yield over consumption) in the Mokuleia aquifer (DEIS, page IV-4) and that the "Use of additional water at the Mokuleia Development (will not) caus[e] any water shortage" (DEIS, page V-4). The Board of Land and Natural Resources has designated the proposed Secondary Resort Area as part of the Waialua Groundwater Control Area. However, the DEIS does not
Mr. Donald A. Clegg  
December 22, 1986  
Page 6

address existing agricultural water consumption nor the impact of groundwater withdrawals on agricultural activities.

Thank you for the opportunity to comment.

JACK K. SUWA  
Chairperson, Board of Agriculture

cc: Mr. Barry R. Okuda  
    LUC  
    DPED  
    DLN  
    OEGC  

Rec'd 12-24-86
January 16, 1987

Suzanne O. Peterson, Chairperson
Department of Agriculture
1428 S. King Street
Honolulu, Hawaii 96814-2512

Dear Chairperson Peterson:

RE: Comments on the Draft Environmental Impact Statement (DEIS) for the Proposed General Plan Amendment to Designate a Secondary Resort Area at Mokuleia

Thank you for your comments of 12-22-86. We respond as follows:

DOA's comments on the Subject DEIS contain a number of related concerns and questions regarding the impacts of the proposal on diversified agriculture. The responses herein have been prepared with input from Bruce Plasch, President of Decision Analysts Hawaii, Inc. Before addressing these concerns and questions, however, the central argument contained in the agricultural analysis of the DEIS is reviewed:

For profitable crops, the growth of diversified agriculture will be limited by the size of the market, and not by a shortage of agricultural land (with the possible exception of lands for crops which are unique to a limited area such as Kula, Maui). It is unlikely that land availability will be a problem because the future requirements for diversified agriculture are very modest compared to the supply of land that will be available. According to A Report on the State of Hawaii Land Evaluation and Site Assessment System (LESA Commission, February 1986), which presents a very optimistic outlook for agriculture to the year 1995, the additional amount of prime agricultural land that will be required for diversified agriculture amounts to only 8,838 acres for the State and 2,314 acres for Oahu. In contrast, the supply of land available for diversified agriculture is huge, and includes: (1) over 80,000 acres of land which has been freed from sugar and pineapple since 1970 (with over 20,000 acres freed on Oahu); (2) land which is likely to be freed from sugar given the outlook for low sugar prices and the fact that most of the industry is given; and (3) land that is being held in sugar while awaiting discovery of unprofitable; and (3) land that is being held in sugar while awaiting development of profitable replacement crops. This land demand/supply balance will not be materially affected by urbanization lands for a secondary resort.

The specific concerns and questions raised by the DOA follow:

1. "The DEIS should discuss how redesignation of the amendment area to Secondary Resort Area status would affect Economic Activity, Objective C, Policies 2, 3, 5 and 6 of the General Plan, relating to the viability of agriculture on Oahu."
This objective and policies read as follows:

Objective C  "To Maintain the viability of agriculture on Oahu."
Policy 2  "Support agricultural diversification in all agricultural areas Oahu."
Policy 3  "Support the development of markets for local products, particularly those with the potential economic growth."
Policy 5  "Maintain agricultural land along the Windward, North Shore, and Wai'anae Coasts for truck farming, flower growing, aquaculture, livestock production, and other types of diversified agriculture."
Policy 6  "Encourage the more intensive use of productive agricultural lands."

Response:

In view of the previous discussion, a secondary resort located at Mokuleia will involve too little land to affect the land economics of agriculture on Oahu. On the other hand, the resort will increase the market for crops (which is the limiting factor). Thus, the viability of diversified agriculture on Oahu will be possibly increased on the North Shore given the expanded market.

In addition, a secondary resort located at Mokuleia would further other economic objectives and policies of the City and County (see DEIS, pp. IX-13 to 24).

2. "...the DEIS does not describe in detail the types, number and magnitude of agricultural uses in the vicinity of the amendment area.

Response:

The principal agricultural activities in the vicinity of the amendment area are pasture (which is a low-profit, landholding activity) and cultivation of sugarcane. In addition, a small amount of land is cultivated for other crops in the Mokuleia area. The attached Exhibit will be included in the Final EIS.

3. "How does the proposed amendment conform to the State Agricultural Functional Plan and its objectives and Policies, particularly Implementing Action B(5)(c)?"

Implementing Action B(5)(c) states that: "Until standards and criteria to conserve and protect important agricultural lands are enacted by the Legislature, important agricultural lands should be classified in the State Agricultural District and zoned for agricultural use, except where, by the preponderance of the evidence presented, injustice or inequity will result or overriding public interest exists to provide such lands for other objectives of the Hawaii State Plan."
Response:

The principal economic force in Mokuleia is the Waialua Sugar Co., Inc. But driven by low sugar prices and the need to reduce costs, Waialua Sugar Co. has been reducing employment. Thus, sugar is incapable of providing sufficient jobs to provide employment to all those who are currently unemployed or who will be graduating from school. Given the limited growth potential of diversified agriculture, it will fall short of providing full employment. In contrast, a successful secondary resort would make a major contribution towards full employment. Furthermore, a secondary resort would involve too little land to adversely affect the growth potential of diversified agriculture.

Therefore, the overriding public interest that argues for development of a secondary resort at Mokuleia is from the Hawaii State Plan, Section 226-6, Objectives and policies for the economy—in general, objective (1):

"Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaii's people."

4. "How does the proposed amendment relate to Hawaii State Plan priority guidelines 226-104(b)(2) and 226-106(1), which direct development into marginal or nonessential agricultural lands to meet housing needs, and "...(maintain) agricultural lands of importance in the agricultural district?"

The guidelines are as follows:

226-104(b)(2): "Make available marginal or nonessential agricultural lands for appropriate urban uses while maintaining agricultural lands of importance in the agricultural district."

226-106(1): "Seek to use marginal or non-essential agricultural land and public land to meet housing needs of low and moderate-income and gaps-group households."

Response:

The intent of the priority guidelines are noteworthy and should be followed as much as practicable. However, it is also obvious that urban uses have not in the past and cannot in the future be confined solely to marginal or nonessential agricultural lands. Therefore, while the priority guidelines are recognized, the development of the other agricultural lands for urban uses is inevitable in order to achieve results intended by other economic objectives, policies and priority guidelines (See DEIS pp. IX-1 to 13).

5. "What impact will this amendment have on future agricultural production requirements and expansion of diversified agriculture, as identified in the Final Report of the Land Evaluation and Site Assessment (LESA) Commission?"
Response:

As noted previously, a secondary resort located at Mokuleia would increase the market for diversified agricultural crops which is the limiting factor for most crops, but would require far too little land to adversely affect growth in diversified agriculture.

Regarding the LESA report, the legislature has taken no action on it. Furthermore, the report contains certain assumptions which seem to overstate land requirements for diversified agriculture, and understate land availability for profitable crops.

6. The broader economic and resource impact on the State from the potential, irrevocable loss of prime agricultural lands should be assessed."

In addition, the DOA states that the following terms are not defined: prime agricultural lands, availability, unprofitable (sugar) mills, and realistic level (of) self-sufficiency in produce crops. Also, the analysis is not documented, and that agricultural lands should be preserved for future crops, possibly cacao.

Response:

This issue is addressed in the previous comments.

Regarding definitions, the terms are used according to common practice. For "prime agricultural lands," its use in the DEIS is the same as that as in the State Agricultural Functional Plan and in LESA. By "availability," it is meant that a farmer can lease or purchase agricultural land if competitive rents and/or prices are offered, and if the costs involved in leasing or selling the land are relatively small. The term "unprofitable" means that costs (including depreciation and cost of capital) exceed revenues. By "realistic level of self-sufficiency in produce crops," it is meant that, for most crops, Hawaii cannot compete with low-cost summer crops from California, and that profitable operations require production at a level short of 100-percent self-sufficiency in order to prevent glutting the market and driving prices to unprofitably low levels.

Documentation for much of the agricultural analysis contained in the DEIS can be found in An Economic Development Strategy and Implementation Program for Moloka‘i, which was prepared for the Department of Planning and Economic Development.

If cacao is proved to be profitable, it likely will replace sugarcane and not require significant amounts of additional lands. This is an example of why the supply of land available for profitable diversified agriculture crops should include lands that are being held in sugar while awaiting discovery of profitable alternate crops.

7. What are the present source(s) and potential alternative use of agricultural irrigation water in the area and the impact on agriculture resulting from the withdrawal of water for domestic consumption?
Response:

As stated in the DEIS, the Mokuleia area is within the Waialua Water Control Area established by the Department of Land and Natural Resources in 1981. The sustainable yield for the Mokuleia area is estimated at 20 million gallons per day. The preserved use, primarily agricultural, is less than half of that amount. Therefore more than an adequate supply of water exists for a resort development. A further indication of this surplus is the Board of Water Supply pursuing the development of additional wells and studying the possibility of transporting water to Waianae. Specific water usage will depend on the size and scope of the development. Should agricultural water requirements be reduced due to development, the sources of agricultural water can be controlled to accommodate the change.

Thank you for your comments.

Sincerely,

[Signature]

Barry R. Okuda

BRO:cp

011
HIENG

Mr. Donald A. Clegg
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

General Plan Secondary Resort Area at Mokuleia
Mokuleia, North Shore, Oahu

Thank you for providing us the opportunity to review the above subject project.

We have no comments to offer at this time regarding this project.

Yours truly,

[Signature]

Jerry H. Matsuda
Major, Hawaii Air
National Guard
Contr & Engr Officer

cc: Barry R. Okuda, Inc. /

Rec'd 12-9-86

No Response Required
December 2, 1986

Mr. Donald A. Clegg, Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King St.  
Honolulu, HI 96813  

Dear Mr. Clegg:

SUBJECT: General Plan Secondary Resort Area  
at Mokuleia - EIS

Due to the lack of specific development information in the EIS Preparation Notice, the degree of enrollment impact on our schools could not be assessed at this time. May we reserve our comments until a later date when more data regarding type and number of housing units proposed are available.

Should you have any questions, please call Mr. Richard Inouye at 737-4743.

Sincerely,

Francis M. Hatanaka  
Superintendent

FMH:dk (MRL)  
cc: Mr. Barry Okuda  
Central Dist. OBS

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER
MEMORANDUM

To: Mr. Donald A. Clegg, Chief Planning Officer
   Department of General Planning

From: Director of Health

Subject: Draft Environmental Impact Statement (EIS) for General Plan Secondary Resort Area at Mokuleia, North Shore, Oahu

Thank you for allowing us to review and comment on the subject draft EIS. On the basis that the project will comply with all applicable Administrative Rules, please be informed that we do not have any objections to this project.

We realize that the statements are general in nature due to preliminary plans being the sole source of discussion. We, therefore, reserve the right to impose future environmental restrictions on the project at the time final plans are submitted to this office for review.

cc: Office of Environmental Quality Control
   Mr. Barry R. Okuda

No Response Required
Honoroble Donald A. Clegg
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King St.
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the proposal to amend the City and County of Honolulu's General Plan to designate Mokuleia as a Secondary Resort Area. The General Plan is a statement of long-range social, economic, environmental and design objectives for the general welfare and prosperity of the people of Oahu. It is not a land use plan for the development of specific parcels of land. The General Plan amendment therefore, does not involve either site-specific or project-specific proposals for resort development.

Regarding Water and Land Development, the current Draft EIS is apparently intended to satisfy EIS requirements for the proposed General Plan amendment, and as such, specific water requirements are not yet known.

Protection and management of groundwater resources is a primary concern. As noted on page IV-4, Mokuleia is included within the Waialua Ground Water Control Area as designated by the Board of Land and Natural Resources under Chapter 177, HRS, and administered by the Department of Land and Natural Resources under Chapter 166 of Title 13, Departmental Administrative Rules. Permits from the BLNR are required for groundwater withdrawals from the designated area and for well drilling, should such be required.

From an aquatic resource standpoint, we cannot adequately evaluate the General Plan amendment without site or project specific details for this area.
Until such time as site-specific or project-specific amendments are proposed — as there are areas within the Mokuleia project boundaries utilized by endangered waterbirds — our Division of Forestry and Wildlife will also reserve comment.

A review of our records indicates that the project area does not contain historic sites that are listed on the Hawaii Register or the National Register of Historic Places, or that have been determined eligible for inclusion on the National Register of Historic Places. The area did contain sites, however, that were recorded by the Bishop Museum in the 1930s (McAllister 1933), which have never been reevaluated for inclusion on the Register. In addition, there may well be sites in the area which have never been recorded due to the lack of recent archaeological surveys in the vicinity.

While according to the EIS, this General Plan Amendment does not involve a site-specific proposal for development, nor a project-specific proposal for resort development; this basis suggests that the potential loss of archaeological resources is of no concern at this time.

We believe that archaeological investigations must be considered early in the planning process, before site-specific or project-specific development plans are made. We strongly suggest that the applicant undertake a general review of the history of land use in the area, including archaeological survey, to use for predictive purposes.

The 1978 Kaena Point State Park Conceptual Plan includes an upland mountain section located in the Peacock Flats area of the Mokuleia Forest Reserve. However, this potential park cannot be developed until public access is obtained through the subject land and adjoining mauka slopes which are also owned by the applicant. This need for mountain access should be addressed in the EIS.

Very truly yours,

WILLIAM W. PATY, Chairperson
Board of Land and Natural Resources

cc: Mr. Barry R. Okuda

Rec'd 1-21-87
January 21, 1987

Mr. William Paty, Director
Department of Land & Natural Resources
1151 Punchbowl Street
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Paty:

Thank you for your comments of January 20, 1987 regarding the subject EIS. We respond as follows:

Archaeological Investigations

The applicant has conducted a review of the literature and field work in connection with the applicant's property at Mokuleia. For predictive purposes a review of the history would seem to serve as an indicator of where future research should be undertaken given a specific development proposal.

Our review of the records uncovered the same information as was discovered in the State study for the Kaena Point State Park. We will include a copy of a map of the Archaeological and Historic Sites for the area included in the study. All information developed by our consultant in 1986 was made available to the State Historic Preservation Officer.

We believe that field surveys should be limited to areas where actual development is proposed in order to limit the survey area. Resources can then be concentrated in areas which may actually be impacted by development.

Mountain Access

Developers must comply with Ordinance 4311 which provides for mountain and beach access. These requirements are generally refined by the appropriate State and City agencies at the
Development Plan or zoning level when a specific site or development will be under consideration.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
December 22, 1986

The Honorable Donald A. Clegg
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Subject: Draft Environmental Impact Statement (DEIS), Proposed General Plan Amendment to Designate a Secondary Resort Area at Mokuleia, Oahu

We have reviewed the subject DEIS and offer the following comments.

The proposed General Plan amendment for a Secondary Resort Area at Mokuleia is not specific in terms of location and project description. Therefore, we are hampered in our review of the appropriateness of this land use in the region and of the anticipated impacts on areas of State concern, including, but not limited to, the preservation or maintenance of important natural systems, cultural resources, and natural resources.

The General Plan currently designates Waikiki as Oahu's primary resort area and West Beach, Kahuku (Kuilia), Makaha, and Laie as secondary resort areas. In view of the status of development of all of the already designated secondary resort areas, we question the necessity of designating another area when none of the four designated areas has reached their full potential and one has yet to be constructed.

The DEIS does not provide sufficient information about the project's market segment to afford statewide comparisons with the Neighbor Island resort areas, particularly the Kaanapali-Kapalua area on Maui, and the expanding North Kona visitor destination areas. To aid in evaluating the projected visitor room requirements, the information sources utilized in John Child's consultant report should be referenced.

The DEIS uses a statewide perspective to minimize the project's impacts on agricultural resources. Since the State is still committed to retaining agricultural activities on Oahu, the impacts should also be assessed from an islandwide perspective.
The Honorable Donald A. Clegg
Page 2
December 22, 1986

One of the Hawaii Coastal Zone Management (CZM) objectives is to improve the development review process, communication, and public participation in the management of coastal resources and hazards. A policy under this objective is to communicate the potential short- and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the general public to facilitate public participation in the planning and review process.

While we acknowledge that the proposed General Plan Amendment is not site- or project-specific, it is also known that Mokuleia Development Corporation has detailed plans for construction of a large resort. The DEIS for the proposed General Plan Amendment should therefore include a discussion of the impacts that are likely to be generated by such further contemplated actions, especially since there is a substantial relationship to the subject General Plan amendment proposal. The above cited CZM policy in this regard is supported by Section 11-200-7 of the Environmental Impact Statement Administrative Rules.

CZM policy provides for the promotion of water quantity and quality planning and management practices which reflect the tolerance of fresh water and marine ecosystems. The proposed amendment to the General Plan should be discussed in terms of its potential effects on the water supply for Oahu. The Department of Land and Natural Resources conducted hearings in 1981 to determine whether the Waialua District should be designated as a Ground Water Control Area (GWCA). Measurements submitted at this hearing revealed a doubling of salinity in some of the wells in this district. Information also revealed past withdrawals in excess of sustainable yield in the core area of the Waialua District, and of withdrawals from the district as a whole being close to its sustainable yield. Overdraft in this area, in conjunction with uncontrolled development of sources in the Schofield high-level water body, has the potential for affecting the recharge of the Pearl Harbor GWCA. Given the importance of the Pearl Harbor GWCA to Oahu's water supply, and because the Waialua aquifer is limited in capacity, the DEIS should be revised to give further consideration to all of these hydrologic factors.

The possibility of Dillingham Airfield being designated a general aviation reliever airport should be examined in light of its potential interactions with a resort in the area. Also, the area in which the secondary resort designation is proposed is downwind of the Waialua Sugar mill. The potential impacts of additional visitors and residents in the area being affected by the smoke plume generated by this existing agricultural use should be discussed.

A statement on Page IX-10 regarding the status of State Functional Plans should be corrected. Ten of the twelve State Functional Plans were adopted by the Twelfth State Legislature on April 19, 1984, and the remaining plans for agriculture and education were adopted by the Thirteenth State
The Honorable Donald A. Clegg  
Page 3  
December 22, 1986

Legislature in April 1985. Part IX of the DEIS should be revised to incorporate recent amendments to the Objectives, Policies and Priority Guidelines of the Hawaii State Plan which were signed into law as Act 276 by the Governor on May 29, 1986.

The EIS should examine the following Priority Guidelines:
Population Growth and Land Resources (Section 226-104, HRS), Economic (Section 226-103(a) through (e), HRS), and Affordable Housing (Section 226-106, HRS). These sections were identified in our comments dated November 6, 1986, on the EIS preparation notice.

We request the opportunity to provide additional comments as more details about the project are provided.

Sincerely,

Murray E. Tonick

Roger A. Ulveling

cc: Mr. Barry R. Okuda  
Barry R. Okuda, Inc.  
Office of Environmental Quality Control
January 16, 1987

Mr. Roger A. Ulveling  
Department of Planning and Economic Development  
P.O. Box 2359  
Honolulu, Hawaii 96804

Re: Comments to DEIS Proposed General Plan Amendment to  
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Ulveling:

Thank you for your comments of December 22, 1986 regarding the subject  
DEIS. We respond as follows:

Comment 1

The General Plan currently designates Waikiki as Oahu’s primary resort  
area and West Beach, Kahuku (Kualima), Makaha, and Laie as secondary  
resort areas. In view of the status of development of all of the  
already designated secondary resort areas, we question the necessity  
of designating another area when none of the four designated areas has  
reached their full potential and one has yet to be constructed.

The DEIS does not provide sufficient information about the project’s  
market segment to afford statewide comparisons with the Neighbor  
Island resort areas, particularly the Kaanapali-Kapalua area on Maui,  
and the expanding North Kona visitor destination areas. To aid in  
evaluating the projected visitor room requirements, the information  
sources utilized in John Child’s consultant report should be referen-

ced.

Response

Market research conducted by John Child and Company, real estate con-
sultants, indicates that by the year 2005 there will be a shortfall  
of between 9,500 to 13,300 rooms on Oahu assuming that all areas  
currently designated for resort use on the Oahu General Plan reach  
their full capacities. Such an optimistic development assumption  
practically ensures that the room shortage will be even greater than  
the one projected.
Mr. Roger A. Uiwating  
January 16, 1987  
Page 2

While the DEIS does provide some information about potential market segments that a Mokuleia resort could serve, such specific information is beyond the scope of this EIS. A resort proposal for the Mokuleia area could be geared to meet a number of different market segments and therefore such an evaluation is more properly conducted at the Development Plan level when a specific concept would be under consideration.

Information sources are identified on Tables 1 through 18 of the DEIS.

Comment 2

The DEIS uses a statewide perspective to minimize the project’s impacts on agricultural resources. Since the State is still committed to retaining agricultural activities on Oahu, the impacts should also be assessed from an islandwide perspective.

Response

The analysis of the impact of the proposal on diversified agriculture, as presented in the DEIS, pertains to both Oahu and the State. The point of the analysis is that, for profitable crops, the growth of diversified agriculture will be limited by the size of the market, and not by a shortage of agricultural land (with the possible exception of lands for crops which are unique to a limited area such as Kula, Maui). It is unlikely that land availability will be a problem because the future requirements for diversified agriculture are very modest compared to the supply of land that will be available. According to “A Report on the State of Hawaii Land Evaluation and Site Assessment System” (ILESA Commission, February 1986), which presents a very optimistic outlook for agriculture to the year 1995, the additional amount of prime agricultural land that will be required for diversified agriculture amounts to only 8,858 acres for the State and 2,314 acres for Oahu. In contrast, the supply of land available for diversified agriculture is huge, and includes: (1) over 80,000 acres of land which has been freed from sugar and pineapple since 1970 (with over 20,000 acres freed on Oahu); (2) land which is likely to be freed from sugar given the outlook for low sugar prices and the fact that most of the industry is unprofitable; and (3) land that is being held in sugar while awaiting discovery of profitable replacement crops. This land demand/supply balance will not be materially affected by urbanization of agricultural lands for a secondary resort.

Detailed projections of diversified agricultural land requirements allocated by island were not included in the DEIS for two reasons. First, the additional information would not have affected the conclusions. Second, realistic projections by island are prevented by the
large amount of uncertainty regarding the future comparative advantages among alternative agricultural areas, particularly given the uncertain future of sugar. For example, in recent years, Molokai has experienced unexpected rapid growth in diversified agriculture because land and water were freed from pineapple and became available at comparatively cheap rates. However, a major portion of this growth has been at the expense of farmers on Oahu (an example of growth being limited by the market, not by the land supply).

Comment 3

While we acknowledge that the proposed General Plan Amendment is not site- or project-specific, it is also known that Mokuleia Development Corporation has detailed plans for construction of a large resort. The DEIS for the proposed General Plan Amendment should therefore include a discussion of the impacts that are likely to be generated by such further contemplated actions, especially since there is a substantial relationship to the subject General Plan amendment proposal. The above cited CZH policy in this regard is supported by Section 11-200-7 of the Environmental Impact Statement Administrative Rules.

Response

We disagree with the DPED interpretation of Section 11-200-7 in this instance. The subject section states that the actions should be treated as a single action if the actions are components, precedent or a commitment to a larger project or if the two actions are essentially identical. We believe that none of these conditions apply. Therefore inclusion of specific impacts of a development plan proposal is not necessary or appropriate.

Comment 4

CZH policy provides for the promotion of water quantity and quality planning and management practices which reflect the tolerance of fresh water and marine ecosystems. The proposed amendment to the General Plan should be discussed in terms of its potential effects on the water supply for Oahu. The Department of Land and Natural Resources conducted hearings in 1981 to determine whether the Waiau District should be designated as a Ground Water Control Area (GWCA). Measurements submitted at this hearing revealed a doubling of salinity in some of the wells in this district. Information also revealed past withdrawals in excess of sustainable yield in the core area of the Waiau District, and of withdrawals from the district as a whole being close to its sustainable yield. Overdraft in this area, in conjunction with uncontrolled development of sources in the Schofield high-level water body, has the potential for affecting the recharge of
the Pearl Harbor GWCA. Given the importance of the Pearl Harbor GWCA
to Oahu's water supply, and because the Waialua aquifer is limited in
capacity, the DEIS should be revised to give further consideration to
all of these hydrologic factors.

Response

In February of 1986 the Honolulu Board of Water Supply prepared an
Environmental Assessment to discuss the Board's long-range development
plans for the North Shore. One of the items under discussion is the
construction of a transmission line for the purpose of exporting water
from the North Shore to the Waianae Coast. While actual development
of such a system is conditioned on meeting the North Shore's existing
and future needs, it is an indication that the Board believes that at
least the potential for exporting water from the area exists. The
DEIS indicates that the Mokuleia aquifer has an excess of sustainable
yield over preserved uses. According to DNR staff, the estimate of
the sustainable yield is under review. Naturally the impacts of a
specific resort proposal will depend on the amount of the estimated
water use. It is our conclusion that no revision of the EIS is
necessary and that the most appropriate time for discussion of the
water issue, given the apparent surplus in the Mokuleia area, is at
the time a specific project is proposed. Only then can the impacts be
assessed.

Comment 5

The possibility of Dillingham Airfield being designated a general
aviation reliever airport should be examined in light of its potential
interactions with a resort in the area.

Response

The potential of Dillingham Field being designated a general aviation
 reliever airport is a political question which has gone unresolved for
years. Designation of the Mokuleia area as a resort area does not
exempt any future specific proposals from recognizing the impacts of a
general aviation airport should it occur.

Comment 6

Also, the area in which the secondary resort designation is proposed
is downwind of the Waialua Sugar mill. The potential impacts of
additional visitors and residents in the area being affected by the
smoke plume generated by this existing agricultural use should be
discussed.
Mr. Roger A. Ulveling  
January 16, 1987  
Page 5

Response

The impact of smoke from the mill will depend on the location of the resort site. Accordingly, this nuisance factor should be recognized and addressed when a specific project is being considered.

Comment 7

A statement on Page IX-10 regarding the status of State Functional Plans should be corrected. Ten of the twelve State Functional Plans were adopted by the Twelfth State Legislature on April 19, 1984, and the remaining plans for agriculture and education were adopted by the Thirteenth State Legislature in April 1985. Part IX of the DEIS should be revised to incorporate recent amendments to the Objectives, Policies and Priority Guidelines of the Hawaii State Plan which were signed into law as Act 276 by the Governor on May 29, 1986.

Response

The EIS is being revised to reflect the correct information.

Comment 8

The EIS should examine the following Priority Guidelines: Population Growth and Land Resources (Section 226-104, HRS), Economic (Section 226-103(a) through (e), HRS), and Affordable Housing (Section 226-106, HRS). These sections were identified in our comments dated November 6, 1986, on the EIS preparation notice.

Response

The EIS will be revised to incorporate an examination of these priority guidelines.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO: awp
December 24, 1986

Mr. Donald A. Clegg, Chief Planning Officer  
Department of General Planning  
City & County of Honolulu  
650 South King Street  
Honolulu, Hawaii  96813

Dear Mr. Clegg:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (EIS) for the Proposed General Plan for the Secondary Resort Area at Mokuleia, Oahu.

The draft EIS does not specifically address plans to meet the housing needs, especially for employees that will be created by the developments anticipated. Recognizing the economic make-up of the community and its neighboring communities and also of the potential employees, the Hawaii Housing Authority (HHA) feels that affordable housing for the low and moderate income population is a definite need that requires consideration.

The HHA recognizes this is a request for change to the general plan and that site-specific or project-specific zoning change requests will contain detailed information. However, the general impact on the housing needs should be addressed.

For any further questions, please contact Colette Sakoda of my staff at 848-3226.

Sincerely,

RUSSELL N. FUKUMOTO  
Executive Director

cc: Mr. Barry R. Okuda  
Barry R. Okuda, Inc.
January 16, 1987

Mr. Russell N. Fukumoto  
Executive Director  
State of Hawaii  
Department of Social Services and Housing  
P.O. Box 17907  
Honolulu, Hawaii  96817  

Re: Comments to DEIS Proposed General Plan Amendment to  
Designate a Secondary Resort Area at Mokuleia, Oahu  

Dear Mr. Fukumoto:  

Thank you for your comments of December 24, 1986 regarding  
the subject EIS.  

The potential need for low/moderate income housing and the  
need for employee housing will be discussed in the Final EIS.  

Thank you again for your comments.  

Sincerely,  

Barry R. Okuda  

BRO:awp
December 11, 1986

Mr. Donald Clegg
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Draft EIS for General Plan
Secondary Resort Area at Mokuleia
Mokuleia, Oahu

By letter dated November 24, 1986 (STP 8.1684), we commented on a General Plan Amendment application for the subject development. Since the draft EIS lacked any traffic impact analysis, we find that our comments are still valid. Accordingly, we have enclosed a copy of our letter for your convenience and consideration.

We appreciate this opportunity to provide comments.

Very truly yours,

[Signature]

Wayne S. Tamashiki
Director of Transportation

Enclosure

Kse'd 12-17-86

cc:    WYY, BAR, AIR, STP(dt)

✓ Mr. Barry R. Okuda
November 24, 1986

Mr. Donald Clegg  
Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii  96813

Dear Mr. Clegg:

General Plan Amendment Application  
Hokuleia, Oahu

From our department's perspective, the subject application lacks information that would allow us to properly assess the development's impact on the State's transportation facilities.

Accordingly, we ask that the applicant carefully address the following areas of concern and make the information available to enable us to evaluate the proposal.

1. Vehicular Traffic. An areawide Traffic Impact Analysis Report (TIAR) should be prepared for our review by our Highways Division. The TIAR should also consider the cumulative effects of this and other planned developments in the area which would contribute to the overall traffic scenario.

2. Air Traffic. The proximity of Dillingham Field to the subject development requires that a thorough noise and land use compatibility analysis study be prepared and submitted for review by our Airports Division.
3. **Ocean Related Commercial and Recreational Activities.** The area includes a substantial shoreline region that needs a comprehensive impact assessment of existing and future recreational/commercial ocean related activities to insure compatibility of uses and the avoidance of conflicts.

Thank you for the opportunity to provide comments.

Very truly yours,

Wayne M. Yamasaki
Director of Transportation

DT:ko

cc: HWY, AIR, BAR, STP(dt)
January 16, 1987

Mr. Wayne J. Yamasaki
Director of Transportation
Department of Transportation Services
650 S. King Street
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Yamasaki:

Thank you for your comments of December 11 and November 24, 1986
regarding the General Plan DEIS. We respond as follows:

1. Vehicular Traffic

We stand by our original November 18, 1986 response to your
November 3, 1986 comment on the preparation notice of the
subject EIS. We believe that there is insufficient informa-
tion at this time to conduct a Traffic Impact Analysis
Report. However, included in the Final EIS will be a more
detailed review of the existing traffic situation in the area
prepared by Parsons, Brinckerhoff, Quaid and Douglas.

2. Air Traffic

There is insufficient information regarding land use at the
General Plan level to allow the preparation of a land use
compatibility analysis study. However, the Noise section of
the Final EIS will contain a copy of the noise contours for
civilian and military operations prepared by Darby and
Associates.

3. Ocean Related Commercial and Recreational Activities

We believe that commercial activities were adequately
addressed in our November 18, 1986 comments. In addition,
current Ocean Recreational resources were discussed in
Section IV.P.2 on page IV-42.
Mr. Wayne J. Yamasaki  
January 16, 1987  
Page 2

Again, thank you for your comments.

Sincerely,

[Signature]

Barry R. Okuda

BRO:awp
December 29, 1986
RE:0453

Mr. Donald A. Clegg, Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Draft Environmental Impact Statement
General Plan Secondary Resort Area at Mokuleia
Mokuleia, Oahu

The above cited document addresses the potential environmental impacts related to the proposed change of the General Plan by adding Mokuleia as a Secondary Resort Area under Objective B, Policy 6 of the General Plan Economic Activity Area of Concern. This review was prepared with the assistance of Paul Ekern, Soils and Agronomy; Michael Graves, Anthropology; Jon Matsuoka, Social Work; and Walington Yee, Environmental Center.

The present Draft EIS addresses only the general impacts associated with the proposed change in the General Plan and does not reflect any site specific project or resort proposal. The purpose of the document, therefore, is to examine the general environmental issues of concern assuming that the area of Mokuleia is redesignated as a secondary resort area.

Socio-Economic Characteristics

At the present time Mokuleia is a rural, bedroom community of predominantly single family homes, small farms, and a few small low rise apartment buildings. Roads are barely adequate for the existing population and other infrastructure needs, i.e. police, fire, schools, and health facilities are characteristically modest and designed appropriate to the present community needs. Certainly the most significant immediate impact of resort designation would be the likelihood of speculative land price increases. Even though the present proposal is purely an administrative change at this stage, it will likely affect land and rental prices through encouragement of land speculation. Hence significant social impacts may be incurred even before actual resort development is begun. Subsequently,
resort development will result in social impacts to the present community due to requirements for additional tax revenues to permit the necessary expansion of all public services (fire, police, schools, roads, and health facilities and recreation areas for example). Because the present document reflects only an administrative change, the Draft EIS does not attempt to provide any quantitative data upon which the specific details of the social impacts can be evaluated. In order to provide a more substantive base upon which a decision can be reached regarding general plan changes, the documents should more objectively evaluate the potential impacts and attempt to quantify the costs and benefits of the proposed change more fully in the Final EIS. For example on page IV-31, no data is offered to substantiate the statements regarding tourism benefits to the general population. The Final EIS should include the basis for the conclusions cited and a discussion of the potential impacts generated by increased employment but at the generally lower mean salaries characteristic of resort developments and the added infrastructure expenditures and increased land prices that are likely to result.

Soils

As indicated by the soil types in Exhibit 10, soils in much of this area have a moderate to high shrink/swell potential. It would be advisable to include a discussion of this potential stability problem as it may affect or influence the ultimate use of the land for resort purposes.

Archaeology

Since no reconnaissance of the project area or archival work has been undertaken to date, the developer cannot realistically anticipate the potential effects on archaeological and historical resources within the project boundaries. The archaeological comments do alert the community to future development plans at Mokuleia, but they do not address any historic preservation issues. Prior to permitting any development at Mokuleia the necessary studies for adequate environmental assessment of the archaeological resources should be required.

We appreciate the opportunity to contribute comments on this document past your designated due date.

Yours truly,

Jacquelin N. Miller
Acting Associate Director

cc: DEQC
Barry R. Okuda
Stephen Lau
Paul Ekern
Michael Graves
Jon Matsuoka
Walington Yee

1-5-87
January 21, 1987

Ms. Jacquelin N. Miller  
Acting Associate Director  
University of Hawaii at Manoa  
Environmental Center  
Crawford 317, 2560 Campus Road  
Honolulu, Hawaii 96822

Re: Comments to DEIS Proposed General Plan Amendment to Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Ms. Miller:

Thank you for your comments of December 29, 1986 regarding the subject EIS. We respond as follows:

Socio-Economic Characteristics

Land Speculation

Land speculation could be a potential result of a change in the General Plan. We believe, however, that given the lengthy land use approval process for any resort project, speculation in land, either for the resort itself or as land benefitting by a resort development, would be unlikely. Other factors influencing land prices which come to mind are fluctuations in sugar prices, operating results at Waialua Sugar, rumors of shutdowns at Waialua Sugar, success or failure of operations and development at Kuliima. The ultimate impact of a resort designation at Mokuleia might be to stabilize land prices.

Quantification of Public Costs

Quantification of public costs depends entirely on the development and operating assumptions of specific resort proposals and should be done at the Development Plan stage.

BARRY R. OKUDA, INC.

1001 Bishop Street, Pauahi Tower, Suite 1800 • Honolulu, Hawaii 96813 • (808) 521-4754
Generally speaking, developments which contain a large component devoted to employment-producing economic activity tend to show positive impacts on state and local finances. For example, the impact on state and local finances prepared for the Kulima Expansion EIS in 1985 indicated a surplus of revenues over expenditures. As to your statements regarding "increased employment" but "lower mean salaries", "added infrastructure" and "increased land prices" we believe that a specific resort proposal is needed in order to quantify these factors.

Soils
A review of soil conditions is an integral part of planning and design for land development. The area proposed for secondary resort designation is composed of a wide variety of soil types with various capabilities to support development. A site-specific and proposal-specific development is needed in order to evaluate the potential impacts and mitigating measures.

Archaeology
A much more thorough evaluation of the archaeological and historic value of sites will be required at the development plan level when a specific parcel(s) for development is known.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
8 December 1986

Mr. Donald A. Clegg, Chief Planning Officer
Dept. of General Planning
City and County of Honolulu
650 S. King Street
Honolulu, HI 96813

Dear Mr. Clegg:

Subject: Draft Environmental Impact Statement for the Proposed General Plan Secondary Resort Area at Mokuleia North Shore District Oahu, Hawaii, November 20, 1986

We have reviewed the DEIS and have no comment to offer. Thank you for the opportunity to review the EIS. This material was reviewed by WRRC personnel.

Sincerely,

Edwin T. Murabayashi
EIS Coordinator
ETM:jm

cc: Barry Okuda

Rcd 12-11-86

No Response Required

AN EQUAL OPPORTUNITY EMPLOYER
December 3, 1986

TO: DONALD A. CLEGG, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: KAZU HAYASHIDA, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: DRAFT EIS FOR PROPOSED GENERAL PLAN SECONDARY RESORT
AT MOKULEIA

We have no additional comments to those already mentioned in
our letter, appended in Part XII of the environmental
document.

If you have any questions, please contact Lawrence Whang at
527-6138.

KAZU HAYASHIDA

cc: Barry R. Okuda

Received 12-5-86

No Response Required
December 8, 1986

MEMO TO: MR. DONALD A. CLEGG, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: HERBERT K. MURAKA
DIRECTOR AND BUILDING SUPERINTENDENT

SUBJECT: DRAFT EIS - PROPOSED GENERAL PLAN
SECONDARY RESORT AREA AT NOKULEIA

We have reviewed the draft EIS for the proposed General Plan Secondary Resort Area at Nokuleia and have no comments at this time.

Thank you for the opportunity to review the draft EIS.

HERBERT K. MURAKA
Director and Building Superintendent

TH: jo
CC: J. Harada
   Barry K. Okuda, Inc.

Rec'd 12-11-86

No Response Required
November 28, 1986

TO : DONALD A. CLEG, CHIEF PLANNING OFFICER  
DEPARTMENT OF GENERAL PLANNING

FROM : FRANK K. KAHOOHANOHANO, FIRE CHIEF

SUBJECT: GENERAL PLAN SECONDARY RESORT AREA AT MOKULEIA: EIS REVIEW

We have reviewed the subject EIS and do not have any additional comments at this time.

Should you have any questions, please contact Battalion Chief Kenneth Word at local 3838.

[Signature]
FRANK K. KAHOOHANOHANO
Fire Chief

FKK/KAW: sb

Rec'd 12-1-86

No Response Required
December 31, 1986

Mr. Barry R. Okuda, President
Barry R. Okuda, Inc.
Suite 1900, Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Okuda:

Draft Environmental Impact Statement (EIS): Proposed General Plan Secondary Resort Area at Mokuleia, Oahu

We have completed a review of the subject draft EIS and hereby transmit our comments to you.

We appreciate the difficulties involved in preparing an EIS for a non-site specific, non-project specific action. With this perspective in mind, we offer the following comments:

1. The potential impact of the proposed amendment on population growth should be explored in the EIS in greater depth. At the present time, the General Plan includes relatively specific policies with respect to future population distribution by geographic area. As is pointed-out in the EIS, the North Shore area in which Mokuleia is located is slated for relatively little population growth in the General Plan. Consequently, any potential conflict between General Plan policies concerned with locating secondary resort development in Mokuleia and population growth in the North Shore area arising from additional population growth induced by resort development should be addressed in the EIS.
2. Although the EIS appears to adequately discuss the potential loss of prime agricultural land to resort development, it does not address potential compatibility problems between agricultural and resort uses when in proximity to one another. While we recognize that resort development is not being treated as site specific in the context of the proposed General plan amendment, sugar cane cultivation and cane hauling activities are so extensive in the Mokuleia area that it should be assumed that some degree of conflict is inevitable and, consequently, should be addressed in the EIS. This should include reference to the possible implications of Chapter 165 of the Hawaii Revised Statutes as suggested by the State Department of Agriculture in an earlier letter to you.

3. Some form of traffic impact analysis should be included in the EIS. Since Farrington Highway is the only arterial serving the Mokuleia area, all resort development, regardless of location within the area, will have equivalent impacts on screenlines east of the area.

4. We agree with the State Department of Transportation that the presence of Dillingham Field within the subject area requires a thorough noise and land use compatibility analysis. Rather than defining the potential hazard and noise impacts on fixed resort sites, such a study should indicate where and how such impacts would exclude and restrict such development within the area.

5. Part IX, "The Relationship of the Proposed Action to Land Use Policies and Controls for the Affected Areas," of the EIS only discusses instances where the proposed action is judged to conform. The Environmental Impact Statement Rules (Section 11-200-17(h)) state that instances where the proposed action may be in conflict should also be discussed. If, in your judgment, no such instances exist, it should be so stated in the EIS.

6. As a matter of style, we feel that the statement of "purpose and need for action" should be more prominently and clearly stated.

7. There should be a discussion of the existing agricultural activity in the area including a map showing the location of such activity.
Mr. Barry R. Okuda  
December 31, 1986  
Page 3

The possibility of relocating any displaced crops to equivalent vacant land should be explored.

8. A correction should be made to paragraph E on Page VIII-2. The City and County of Honolulu do not review the General Plan every five years. The City Charter states that the General Plan must be revised at least every five years. It was last revised in 1985. We are currently developing some additional revisions to be proposed in 1987.

If you have any questions regarding the above comments, please contact Peter Vlachos, a member of my staff at 527-6054.

Sincerely,

[Signature]

DONALD A. CLEG
Chief Planning Officer
January 21, 1987

Mr. Donald A. Clegg
Chief Planning Officer
Department of General Planning
650 S. King Street
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Clegg:

Thank you for your comments of December 31, 1986 regarding the subject EIS. We respond as follows:

Comment 1: Population

While the General Plan does set relatively specific policies with respect to distribution of population, there is room within the existing guidelines for moderate population growth in the North Shore Development Plan area. This would allow resort proposals to have the flexibility of a resort/residential component.

Population which may be induced by resort development will be constrained by available housing accommodations.

Given the City's policy of matching housing supply with desired growth patterns, some other planning action by the City and County would have to take place before additional housing growth would be permitted. If no growth is permitted, excess housing demand in the area would generate higher rents, higher land values, and, to the extent that doubling up or overcrowding occurs, an increase in population.

These pressures would be mitigated to the extent that unemployed or underemployed persons from the area were able to take the resort-generated jobs and to the extent that workers in the Central Oahu area were to take the jobs and commute. It is necessary to evaluate a specific project in order to determine its potential impact on population in the area.
Mr. Donald A. Clegg  
January 21, 1987  
Page 2

Comment 2: Potential for Agricultural-Resort Conflict

Agricultural and resort uses have coexisted in Hawaii in numerous locations. Kaanapali on Maui was carved out of the Pioneer Mill plantation while the Kapalua resort on Maui coexists with pineapple operations of Maui Land and Pineapple. Often resort and agricultural interests coincide. Agricultural activities which provide attractive open space in close proximity to resort developments can actually enhance the visitor's perception of the resort development's aesthetic characteristics. At the same time improved infrastructure in the area due to resort development may benefit plantation agriculture by providing infrastructure improvements in an area where cost for these improvements might otherwise have to be borne by the plantation or its employees. Obviously there are opportunities for friction between agricultural and resort operations, however, there is no certainty of negative impacts on either.

Comment 3: Traffic Impacts

Resort size and type will determine actual traffic impacts. The Final EIS has been revised to include a more in-depth analysis of the traffic conditions which currently exist. The report is prepared by Parsons, Brinckerhoff, Quaid and Douglas.

Comment 4: Noise Contours

The Final EIS has been revised to include noise contours for Civilian and Military operations at Dillingham Field.

Comment 5: Discussion of Potential Conflicts with Existing Policies

The Final EIS will be revised to comply with your comment.

Comment 6: Change of Style, Purpose and Need Statement

As requested, the statement will be modified in the Final EIS.

Comment 7: Existing Agricultural Activity Map

The requested map will be included in the Final EIS. Section IV.K extensively documents the availability of agricultural lands. However, without a specific site to evaluate, it is difficult to determine what crops might be impacted. It does appear that land is available elsewhere to pursue the raising of agricultural commodities.
Comment 8: Correction

Page VII-2 will be revised to reflect the information provided in Comment 8.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
December 8, 1986

Mr. Donald A. Clegg, Chief Planning Officer
Department of General Planning
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Subject: Environmental Impact Statement
General Plan Secondary Resort Area at Makuleia

Thank you for the opportunity to review and comment on the proposed project in Makuleia, Oahu.

The proposed project is not site specific or project specific and no impacts or mitigating measures can be identified. However, as a condition to the approval of the zone change (agriculture to residential use), we recommend that the developer set aside ten (10) percent of the units within the price range of the low- and moderate-income families or contribute in kind the development of low-moderate housing acceptable to DHCD. We would welcome the opportunity to assist the developer in formulating a program to provide these units. Please have the developer contact Mr. James Miyagi at 523-4264.

We will retain the report for our files.

Sincerely,

[Signature]

CC: Mr. Barry R. Okuda
January 16, 1987

Mr. Michael Moon, Director
Dept. of Housing & Community Development
650 S. King Street
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Moon:

Thank you for your comments of December 8, 1986 regarding the subject EIS.

We recognize the provision of low- and moderate-income housing is an issue that is generally resolved at the Development Plan or Zone Change level.

Again, thank you for your comments.

Sincerely,

[Signature]

Barry R. Okuda

BRO:awp
MEMORANDUM

TO: DONALD A. CLEGGS, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: JOHN P. WHALEN, DIRECTOR

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)
FOR "PROPOSED GENERAL PLAN SECONDARY RESORT AREA
AT MO'KULEIA, NORTH SHORE DISTRICT, OAHU, HAWAII"

December 18, 1986

We have reviewed the Draft EIS and have the following comments:

1. Scenarios for Development

Even though the proposed designation of Mo'kuleia is not site-
or project-specific, it is important to be able to estimate
the magnitude of probable development. At least two scenarios
should be considered. These would be:

a. Low intensity resort development for about 250 visitor
units, such as at Laie.

b. High intensity resort development for about 4,000 visitor
units such as at West Beach and Turtle Bay.

Our consideration for the 4,000 visitor unit scenario is based on
what may be the minimum number of visitor units which will be
required to economically sustain an essentially physically
self-contained resort community.

2. Determination of Minimum Resort Development Magnitude

Both the Turtle Bay Resort and the West Beach Resort have
selected 4,000 visitor units as the threshold necessary for
economic feasibility. What would the minimum number of
visitor units be for establishing a self-contained resort
community in Mo'kuleia?
MEMO TO DONALD A. CLEGG
Page 2

3. Factors Limiting Physical Scale of Resort Development

The soil characteristics of Mokuleia may be a limiting factor to development. Can multi-story buildings be constructed without any problems? Or, must construction be limited to one- and two-story structures?

4. Queen’s Beach (Ikekai) Proposal

Note that the General Plan amendment to include Hawaii Kai as a Secondary Resort Area was disapproved by the City Council.

5. Requirement for Supplemental EIS

A supplemental EIS should be required as details regarding the site and project impacts become available either at the Development Plan (DP) amendment stage or at the rezoning stage.

Thank you for the opportunity to comment. If you have any questions regarding our comments, please call Bennett Mark of my staff at 527-5038.

JOHN P. WHALEN
Director of Land Utilization

JPW:sl
0603B
cc: Barry R. Okuda

Ree'd 12-19-66
January 16, 1987

Mr. John P. Whalen, Director
Department of Land Utilization
Municipal Office Building, 7th Floor
650 S. King Street
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Whalen:

Thank you for your comments of December 18, 1986 regarding the
subject EIS. We respond as follows:

Comment 1

The General Plan of the City and County of Honolulu is a state-
ment of long-range social, economic, environmental and design
objectives and policies for the general welfare and prosperity of
the people of Oahu. It is not a Land Use Plan for the develop-
ment of specific parcels of land. The Chief Planning Officer
(CPO) has taken the position that applications to amend the
General Plan do not require environmental impact statements
pursuant to Chapter 343, HRS. At our request, however, the CPO
had agreed to process this EIS, which then allows compliance with
the Environmental Council's ruling that such an EIS is required.
However, the difficulty of preparing a General Plan EIS was also
recognized by the Environmental Council, which stated in its
Declaratory Ruling No. 86-1, item 13: "If all the specific
details of a project are not available at the general plan ... 
stage, then the environmental impact statement ... need not be
voluminous. When sufficient details become available, the
accepting authority can then require the preparation of a
supplemental environmental impact statement ..." Therefore,
detailed analyses of resorts of varying number of visitor units
should not be required of this EIS but examined upon submission
of a specific proposal ... i.e., during the Development Plan
amendment process.
Comment 2

The minimum number of visitor units for establishing a resort community in Mokuleia would be determined as part of an application to amend the North Shore Development Plan.

Comment 3

Structures in excess of two stories presently exist in the proposed Secondary Resort Area Boundaries for Mokuleia. Soil suitability will become a factor for review when a site-specific proposal is processed as a development plan amendment and/or change in zoning.

Comment 4

We are aware that the Ikekai General Plan Amendment was disapproved by the City Council.

Comment 5

See response to Comment 1 above.

Sincerely,

Barry R. Okuda
BRO:awp
DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAI'I 96813

December 9, 1986

TO: DONALD A. CLEGG, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: TOM T. NEKOTA, DIRECTOR

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT
SECONDARY RESORT AREA AT MOKULEIA - WAIALUA
TAX MAP KEY 6-8-02, 03, 07, 08, 09 and 10

We have reviewed the Environmental Impact Statement (EIS) for the Secondary
Resort Area at Mokuleia and make the following comments.

We have determined that the EIS report is generally acceptable. The applicant
is aware that contact should be made with our department to discuss the
project's recreational needs, park dedication, and public access requirements
before applying for a North Shore Development Change.

Should you have any questions, please call Mr. Jason Yuen of our Advance
Planning Section at extension 6315.

TOM T. NEKOTA
TOM T. NEKOTA, Director

TTN:m1

Rec'd 12-15-86

√cc: Barry Okuda, Inc.

No Response Required
MEMORANDUM

TO:    MR. DONALD A. CLEGG, CHIEF PLANNING OFFICER
       DEPARTMENT OF GENERAL PLANNING

FROM:  RUSSELL L. SMITH, JR., DIRECTOR AND CHIEF ENGINEER
       DEPARTMENT OF PUBLIC WORKS

SUBJECT: DRAFT EIS ON THE GENERAL PLAN SECONDARY RESORT AREA AT MOKULEIA

December 8, 1986

We are responding on the Draft EIS on a proposed General Plan Amendment for a secondary resort area at Mokuleia. Our comments are as follows.

1. The City's proposed wastewater treatment plant (WTP) serving the Wai'alea and Hale'iwa sewerage district is planned not far from the Kamananui boundary of the secondary resort area, and mauka of the present General Plan designated site. Construction of the treatment and disposal facilities has been tentatively scheduled in 1990.

2. The proposed WTP does not presently have any provisions to serve a secondary resort area since there are no such designations on the General Plan's Land Use Map.

3. If a wastewater treatment plant is constructed in conjunction with a proposed resort area and dedicated to the City and County for operation and maintenance, it will have to be built according to City standards. Effluent disposal should be compatible to the proposed Facilities Plans and water quality management plans for the drainage area.

4. We have no drainage comments.

RUSSELL L. SMITH, JR.
Director and Chief Engineer

cc: Mr. Barry R. Okuda

Rec'd 10-10-86
January 16, 1987

Mr. Alfred Thiede  
Acting Chief Engineer & Director  
Department of Public Works  
650 S. King Street  
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Thiede:

Thank you for your comments of December 8, 1986 regarding the subject EIS.

Your comments regarding the wastewater treatment facilities will be incorporated in the Final EIS.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda  
BRO:awp
Mr. Donald A. Clegg,
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 S. King St., 8th Floor
Honolulu, Hawaii 96813

December 18, 1986

Dear Mr. Clegg:

The North Shore Neighborhood Board held a special meeting on December 9, 1986, at the John Kalili Surf Center, to discuss the draft EIS which was being prepared in conjunction with Mokuleia Development's request for a General Plan Amendment to include Mokuleia as a secondary resort area. After reading subject draft, Board members began to feel frustrated because the Mokuleia Development Company's representatives answered our questions with answers like, "Not necessary at this time since the General Plan Amendment does not identify a site-specific/project-specific resort proposal." How can we address this matter, the large land boundary area that they want to designate "Secondary Resort", without addressing concerns and impacts to the residents of Mokuleia, Waialua, Haleiwa, Sunset and outlying areas?

These are some of the concerns that the Board felt were not answered adequately in the Draft EIS.

1. There is a need for an economic study to determine how this proposed resort would affect the Turtle Bay Resort. The possibility of too much competition could result in both resorts experiencing poor occupancy.

2. The archeological section needs to be examined in greater depth.

3. Likewise, a more detailed traffic study is needed.

4. The developer may construct seawalls. If this is done, then a study should be conducted to see what effect this will have on adjacent properties.

5. Of major concern is what effect this proposed "Secondary Resort" would have on Waialua Sugar Company. It is very possible that dust, noise, ash, and soot from the adjacent agricultural lands would create problems for visitors or residents living nearby. This could reduce the capabilities and variability of Waialua Sugar Co. There is a substantial amount of agricultural land within the designated boundary area. The taking of "prime" agricultural land for Resort use may not really be in the community's best interests. We should give Waialua Sugar Co. all the help we can to keep sugar alive in Waialua, not create problems that may result in reduced production capabilities.

6. There is a need for more information on how the change in lifestyle from rural to urban will affect the citizens of the North Shore. We need more information on this cultural shock!
7. There has been no statement regarding low cost, employee housing or day care centers. Where will all the employees live? There is already a shortage of housing on the North Shore.

8. The North Shore's population for the 2005 is estimated to be between 15,262 and 17,181. If this "project" is allowed to proceed, population estimates will be exceeded and may bring about an "over loading" effect to our public facilities, which are already running at their full capacity. "Monies" that may be brought into the economy from the resort area do not necessarily go into our community's public facilities. More often than not, the money goes into the bigger pot downtown.

9. Nothing has been mentioned regarding the investment of dollars in the community other than the money that will be spent to build the resort.

10. We also feel that housing units should not be built near Dillingham Field.

11. We read in the Draft EIS that, "North Shore residents have a lower educational level ... ". Where and how were these statistics obtained?

12. It is impossible to address possible impacts and concerns when we have no information on the heights of buildings, especially along the coast line.

13. We have yet to access the impacts of the Turtle Bay project. We do know that it will affect the entire North Shore area. We anticipate housing shortages and an increase in traffic. We can't make a fair judgement on another Secondary Resort area until we learn how that project will impact the community.

14. Employment opportunities for residents of this area; will there be any guarantee that North Shore residents will be given first priority for these new jobs. We would also like to know how many and what type of jobs may be available.

15. The Neighborhood Board has decided not to address the Draft EIS Section No. 8 Alternatives until the final EIS is distributed.

Thank you for the opportunity to address the Mokuleia Development Co. Draft EIS.

Sincerely,

Meryl M. Andersen
Chairman

cc: Honolulu City Council
    Barry R. Okuda, Inc.
    Sen. Gerald Hagino
    Rep. Joe Leong
    Neighborhood Commission
January 16, 1987

Ms. Meryl M. Andersen, Chairman
North Shore Neighborhood No. 27
P.O. Box 607
Haleiwa, Hawaii 96712

Re: Comments on Draft EIS for General Plan Change to Include a Secondary Resort Area at Mokuleia

Dear Ms. Andersen:

Thank you for your comments of December 18, 1986, regarding the subject EIS. We respond as follows:

We understand and are sympathetic to the Board’s frustration in attempting to review the EIS for the General Plan. Perhaps the Board’s reaction, in a way lends support to the Chief Planning Officer’s position that an EIS is not appropriate or necessary at the time of a General Plan change. However, we are compelled to pursue an EIS because of the previous ruling by the Environmental Council that an EIS is required for an amendment to the General Plan.

The DEIS explains why many of these concerns cannot be evaluated fully until a specific site/proposal is evaluated as part of the Development Plan amendment process. The Environmental Council anticipating this situation indicates in its Declaratory Ruling No. 86-1 that the EIS at the General Plan stage need not be voluminous and that a supplemental EIS can be required when more details are available.

In reviewing your letter of December 18, 1986, we find that most of your concerns (see below) fall into this category of impacts which cannot be adequately addressed without a specific proposal that sets forth a location, magnitude/concept of development, amenities, market segments, etc.

<table>
<thead>
<tr>
<th>Comment #</th>
<th>Concern</th>
<th>Detail Needed</th>
<th>To Determine</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Economic Study</td>
<td>Concept, size of development, market segment, etc.</td>
<td>If competition between Kaulima &amp; Mokuleia is good or bad.</td>
</tr>
<tr>
<td>2.</td>
<td>Archaeological</td>
<td>Specific parcel/site</td>
<td>Impacted area within which a study can be confined.</td>
</tr>
</tbody>
</table>
3. Traffic  Both location of site and magnitude/concept of development

estimated traffic to be generated. The final EIS will include additional information on existing traffic conditions.

4. Seawall  Specific parcel/site and development concept

need for walls and to confine study to impacted shoreline.

5. Life style  Magnitude/concept of development

changes to life style.

6. Housing  Magnitude/concept of development

actual need for housing.

7. Population  Magnitude/concept of development

the residential as well as de facto population.

8. Investment  Both location of site and magnitude/concept of development

what other investments in the community will be made.

9. Airfield  Location of site

degree of impact from aircraft using the airfield.

10. Building heights  Specific parcel/site and magnitude/concept of development

building locations, bulk and heights.

11. Employment  Concept/magnitude of development

number and types of jobs to be created and likelihood of North Shore residents having priority hiring.

Other comments and questions in your letter can be answered as follows:

5. Agriculture

Agricultural and resort uses have coexisted in Hawaii in numerous locations. Kaanapali on Maui was carved out of the Pioneer Mill plantation while the Kapalua resort on Maui is next to the pineapple operations of Maui Land and Pineapple. Often resort and agricultural interests coincide. Agricultural activities which
provide attractive open space in close proximity to resort developments can actually enhance the visitor's perception of the resort development's aesthetic characteristics and rural setting. At the same time improved infrastructure in the area due to resort development may benefit plantation agriculture by providing infrastructure improvements in an area where cost for these improvements might otherwise have to be borne by the plantation or its employees. While there are opportunities for friction between agricultural and resort operations, there is no certainty of negative impacts on either. Note: HRS 165 Hawaii Right to Farm Act recognizes this potential conflict and provides some protection to the agricultural activities.

11. Educational Statistics

Statistics on educational level were obtained from 1980 Census data.

13. Turtle Bay Expansion

The impacts of the Turtle Bay Expansion were exhaustively researched and discussed in the "Revised Environmental Impact Statement, Volume 1 and Volume 2, Ko'olina Resort Expansion Dated 7 October 1985." This document was accepted by the Department of Land Utilization, the accepting authority. While it might be convenient to have actual input from the Turtle Bay development, it is not essential and action on Mokuleia as a secondary resort should not be delayed awaiting Ko'olina's expansion experience.

15. Timing of NB 27 response

No response necessary.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:scp
009
December 10, 1986

TO:       DONALD A. CLEGG, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM:     DOUGLAS G. GIBB, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT (EIS)
PROPOSED GENERAL PLAN SECONDARY RESORT AREA
AT MOKULEIA, NORTH SHORE, OAHU

Thank you for the opportunity to provide comments on the proposed
General Plan Amendment to designate Mokuleia as a secondary resort
area.

We have reviewed the document and would like to add the following
comments to Part IV.10. Police Protection, beginning on page IV-52:

1. The Police Department now has 5 districts.
District I has been redefined to include the area
from East Honolulu to Primary Urban Center. The
new District V covers the area from Nuuanu to the
airport with the district station located in Kalihi
Valley.

2. The change in status of Kahuku from a substation to
a district station is still in the planning stages.
Such a change, however, would not automatically
increase police services. The delivery of police
services is based on a sufficiency of personnel and
other resources. If an increase in population were
to occur in a particular area, we would not
increase our services to match without an increase
in the total authorized police manpower.
Donald A. Clegg
Chief Planning Officer
December 10, 1986
Page 2

Again, thank you for the opportunity to comment.

DOUGLAS G. GIBBS
Chief of Police

cc: Mr. Barry R. Okuda

12-1 12-26
January 16, 1987

Mr. Douglas G. Gibb
Chief of Police
Honolulu Police Department
1455 S. Beretania Street
Honolulu, Hawaii 96814

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Chief Gibb:

Thank you for your comments of December 10, 1986 regarding
the subject EIS.

Part IV. 10, Police Protection, has been revised to reflect
the comments contained in your letter.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
MEMORANDUM

TO: DONALD A. CLEGG, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING

FROM: JOHN E. HIRTEN, DIRECTOR

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
PROPOSED GENERAL PLAN SECONDARY RESORT AREA AT NOKULEIA

December 17, 1986

This is in response to the request of November 21, 1986 from the
State Office of Environmental Quality Control for our review and
comments on the above subject.

The draft EIS indicates that a traffic impact study will be
conducted when a Development Plan Amendment is processed for a
site-specific project-specific resort proposal. Accordingly, we
have no comments at this time and will present our comments upon
receipt of the traffic impact study.

cc: Mr. Barry R. Okuda

No Response Required
December 4, 1986

Mr. Donald A. Clegg
Chief Planning Officer
Dept. of Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Subject: Environmental Impact Statement (EIS) for General Plan
Secondary Resort Area at Mokuleia

We have reviewed the above subject document and find the future impact on HECO's existing facilities and the need for additional facilities in the Mokuleia area can not be fully evaluated until more definitive load requirements are developed.

Sincerely,

Brenner Munger

JIM:gy

cc: Barry R. Okuda
Barry R. Okuda, Inc.

No response required
3876 Sierra Dr.,
Honolulu, Hawaii 96816
December 23, 1986

Mr. Donald A. Clegg, Chief Planning Officer
Dep't. of General Planning
City & County of Honolulu
655 South King St.,
Honolulu, Hawaii 96813

Dear Mr. Clegg:


The applicant has consistently indicated that the general Plan (the subject EIS) does not identify site-specific or project specific proposals and therefore actual impacts cannot be determined.

In view of the fact that Mokuleia Development Corporation has already submitted a development plan land use amendments request to your office (see enclosed copies of page A-7 and A-8 of application), the applicant's contention that specific impacts cannot be determined at this time is an invalid one.

Accordingly, it is imperative that the Environmental Impact Statement in question be revised to reflect the foregoing impacts before any action to change the General Plan is taken.

Sincerely,

James C. Lan

Enc.

cc: Tavor Pasi
Chairman Morgado
Co., Waiea
Honolulu Advertiser
Honolulu Star-Bulletin
Sierra Club
Outdoor Circle
No. Shore Neigh. Bd:
Others
Amendment/Project Information

Amendment Request: From Preservation and Agriculture to Resort (313 acres), Residential (331 acres), Park-Golf Course (342 acres), Commercial (33 acres).

Location: Mauka and makai of Farrington Highway in Mokuleia

Owner/Developer: Northwestern Mutual Life Insurance Company/Mokuleia Development Corp.

Initiated By: Chief Planning Officer

Basis for Request: To provide resort facilities and housing

Type of Project: Resort (2,100 hotel and 1,200 condo units), residential (700 units), commercial (69,000 s.f. floor area), and recreational (36 hole golf course) development.

Impact on Provision of Housing: 700 single-family units

Existing Conditions

Land Use: Ranch land, polo field, vacant

Structures

Number: 11
Type: Residences
Height: One story

ALISH: Mostly Prime and Other Important

Soil Features: 50% Puheu clay loam (PHA) 0-3% slopes, moderate permeability, slow runoff, low areas subject to flooding; Kaena stony clay (KaeB) 2-6% slopes, slow runoff, slight erosion hazard; high shrink-swell potential, low shear strength, slow to medium runoff, slight to moderate erosion hazard; 50% other.

Possible Constraints: Portion in Flood Hazard District and SPA R-8
January 21, 1987

Mr. James C. Lam
3876 Sierra Drive
Honolulu, Hawaii 96816

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Lam:

This responds to your comments of December 23, 1986, to Don Clegg on the subject DEIS.

We believe there is a bit of confusion relating to this EIS which should be clarified. Initially the applicant published a prep notice for an EIS pertaining to a specific project on its lands as part of a Development Plan (DP) amendment request.

An EIS for the General Plan (GP) change is being done to comply with the Environmental Council's Declaratory Ruling No. 86-1. While this ruling states that an EIS is needed for a GP change, it also anticipated that (item 13) "If all the specific details of a project are not available at the general plan stage, then the environmental impact statement ... need not be voluminous. When sufficient details become available, the accepting authority can then require the preparation of a supplemental environmental impact statement ..." After consultation with OSQC and DGP, we have prepared the EIS for this GP amendment on a non-project specific basis.

We believe that we have prepared the General Plan EIS in a manner which follows the guidelines given us by the Environmental Council. As you are aware, adoption of a General Plan amendment would permit Development Plan amendment proposals from any applicant, not just the one that has a pending
Development Plan EIS prep notice. That is why the application maintains its separate status.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp
December 22, 1986

Mr. Donald A. Clegg
CFO
Dept. of General Planning
City & County of Honolulu
650 S. King St.
Honolulu, HI 96813

Re: Draft EIS for proposed General Plan Secondary Resort Area
at Mokuleia

Dear Mr. Clegg:

We find the subject EIS totally unacceptable. It is no secret
that Mokuleia Development Corporation is seeking to develop its
property in Mokuleia as a resort and that that action requires a
General Plan & Development Plan Amendment. To repeat over and over
throughout the EIS that the proposed amendment "is not site specific
nor project specific" is an insult to the public's intelligence.

Pursuant to HRS, Chapter 343, an EIS is required when a General
Plan Amendment would result in designations other than agriculture
or preservation. The purpose of the EIS is to provide information
concerning the impact of a proposed project on the environment so
that an informed judgment might be made. One can hardly make a
decision when impacts are not even discussed. Whatever the developer
or others might consider an appropriate EIS at this stage, it is
impossible to postpone full consideration of traffic, utilities,
noise, agriculture, life style, etc., to a future date. Isn't that
like buying a pig in a poke? For once a developer has a General
Plan Amendment in hand is it not a mandate to seek DP and zoning
changes? At that point it is generally too late for communities and
concerned organizations to have proposals of this magnitude recon-
sidered.

While largely ignoring environmental concerns, the present
document deals at great length with economic considerations and
quotes extensively from DPES data and projections prepared by
John Child & Company. Objections to the same arguments were raised
by Senator Steve Cobb with regard to Kaiser's proposed resort

250 S. Hotel St., Rm. 211, Honolulu, Hawaii 96813. Tel. 521-1300
development at Queen's Beach. (Letter from Senator Steve Cobb addressed to Mr. Donald Clegg, 5 November 1985). It appears that there is a great deal of uncertainty as to how many resort units exist today on O'ahu let alone how many are planned for the future. It is certainly not as cut and dried as this "EIS" would purport. Why isn't the entire story being told?

More important, of course, are the concerns other than economics. These matters must be addressed honestly. The present land use designations reflect a desirable balance. Mokuleia is an area that has a rural atmosphere, an agricultural character, open space amenities, and a low key life style. The General Plan was written to preserve these qualities. One cannot brush them aside with biased economic arguments, the developer's promise of jobs (which is, in reality, no guarantee of jobs to area residents), and the ruse of "no site, no project". If the proposal is not specific why consider it?

In drafting the present General Plan, the city administration studied various sites as tourism designations and had a meeting of all neighborhood boards and other interested parties to discuss this islandwide concern. The conclusions of that study and that meeting are reflected in the General Plan. The General Plan is reviewed every five years and one would expect that the upcoming review in 1987 would be the appropriate occasion to discuss Mokuleia. It seems only right that such amendments be considered on an islandwide basis.

Mole Kalidmaka

Arthur L. Mori
President

Received 12-2-76
BARRY R. OKUDA, INC.

January 16, 1987

Mr. Arthur L. Mori
President
Life of the Land
250 S. Hotel Street, Room 211
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Mori:

This responds to your comments of December 22, 1986, to Don Clegg on the subject DEIS.

We believe there is a bit of confusion relating to this EIS which should be clarified. Initially the applicant published a prep notice for an EIS pertaining to a specific project on its lands as part of a Development Plan (DP) amendment request. Life of the Land is a consulted party. Subsequently, the applicant decided that an EIS would be done for the required amendment to the General Plan (GP) which action would precede the amendment to the DP. Accordingly, a separate prep notice and later the Draft EIS were published for the GP amendment. Therefore, it is "no secret", as you say, that the applicant is planning a specific project, this fact is not relevant to the subject EIS being done for the proposed GP amendment.

An EIS for the General Plan (GP) change is being done to comply with the Environmental Council's Declaratory Ruling No. 86-1. While this ruling states that an EIS is needed for a GP change, it also anticipated that (item 13) "If all the specific details of a project are not available at the general plan stage, then the environmental impact statement ... need not be voluminous. When sufficient details become available, the accepting authority can then require the preparation of a supplemental environmental impact statement ...". After consultation with OEQC and DGP, we have prepared the EIS for this GP amendment on a non-project specific basis.
Mr. Arthur L. Mori  
January 16, 1987  
Page 2

We believe that we have prepared the General Plan EIS in a manner which follows the guidelines given us by the Environmental Council. As you are aware, adoption of a General Plan amendment would permit Development Plan amendment proposals from any applicant, not just the one that has a pending Development Plan EIS prep notice. That is why the application maintains its separate status.

Your point that no one knows for certain how many resort units presently exist or are planned for the future is well taken. It suggests that demand could be less or greater than the projections contained in the study by John Child. I believe that these are exactly the types of issues that shall be brought out by the General Plan EIS process.

We believe that project specific items, i.e., number of jobs projected, and quantifiable impacts on the economy and the environment are most appropriately discussed at the Development Plan level on a project specific basis.

Regarding your comment on the General Plan Review, the Department of General Planning has stated, "The City and County of Honolulu does not review the General Plan every five years. The City Charter states that the General Plan must be revised at least every five years. It was last revised in 1985. We are currently developing some additional revisions to be proposed in 1987." It was our understanding that a Secondary Resort Designation for Mokuleia was not under consideration by the Department of General Planning, hence the applicant initiated this General Plan Amendment EIS.

Sincerely,

Barry R. Okuda

BRO:awp
December 23, 1986

Mr. Donald A. Clegg
Chief Planning Officer
Department of General Planning
650 South King Street
Honolulu, Hawaii 96813

Re: Draft EIS for Secondary Resort at Mokuleia

Dear Mr. Clegg:

This is in response for comments on the above subject. We wish to inform you that the Mokuleia Advisory Committee has discussed the above-mentioned EIS and has voted unanimously as follows:

That the Draft EIS, as submitted, is satisfactory for the purposes intended, except the Committee feels that:

1. fulltime ambulance service to the Mokuleia area;
2. the need for a community center; and
3. the need for additional fire protection services

should be addressed more fully. If not, they should be thoroughly discussed at the Development Plan stage.

Very truly yours,

Robert B. Jones
Secretary

cc: Barry R. Okuda
Office of Environmental
Quality Control
January 21, 1987

Mr. Robert B. Jones, Secretary
Mokuleia Advisory Committee
Pacific Tower, Suite 979
1001 Bishop Street
Honolulu, Hawaii 96813

Re: Comments to DEIS Proposed General Plan Amendment to
Designate a Secondary Resort Area at Mokuleia, Oahu

Dear Mr. Jones:

Thank you for your comments of December 23, 1986 regarding the subject EIS.

1. Ambulance Service

This has been a North Shore community concern for a long time. Due to the small population base of the area, private operators find provision of service uneconomic. Public service, when evaluated in terms of service provided vs. costs, must compete with other uses for government funds. Further development, such as a resort area, will help to justify another look at providing this service. This issue can be more thoroughly discussed at the Development Plan stage where information relating to population and other impacts can be identified.

2. Community Center

We believe that the need for this facility should be discussed at the Development Plan level, when specific information regarding the concept and magnitude of development would be available.
3. **Fire Protection**

As discussed in the DEIS, a specific proposal is needed in order to determine the extent to which facilities and staffing will be impacted. This issue will also require more detailed discussion at the Development Plan level.

Again, thank you for your comments.

Sincerely,

[Signature]

Barry R. Okuda

BRO:awp
To: Mr. Donald A. Clegg, Chief Planning Officer  
Department of General Planning  
City and County of Honolulu  
650 S. King Street  
Honolulu, Hawaii 96813

December 23, 1986

Subject: Moluleia: E.I.S. for a proposal for a Secondary Resort

Dear Donald:

I am greatly concerned about this E.I.S. document. It is the stated purpose of the developer to request the inclusion of a "secondary resort" at Moluleia into the General Plan.

But how can the City Council, your Department of General Planning, and all others involved, arrive at a decision if the crucial issues such as traffic, ag. land, public utilities, water consumption, and many others are not even discussed in the E.I.S.

Since the scope of this project is known to be 2,100 hotel and 1,200 condo units and so on, why can the impact not be calculated now and incorporated into this report which then could form a basis for your decision making!

Maybe I am getting out of line but this E.I.S. report does not appear to be an objective statement of facts; rather it reads like a brochure for the promotion of this development.

Sincerely,

Niels Stoerner

c.c. City Council Chairman Morgado  
Council Leigh Wai Doo  
DEQC, L. Uehara
January 21, 1987

Mr. Niels Stoermer
3115 Diamond Head Road
Honolulu, Hawaii 96815

Re: Comments to DEIS Proposed General Plan Amendment to Designate a Secondary Resort Area at Wokuleia, Oahu

Dear Mr. Stoermer:

This responds to your comments of December 23, 1986, to Don Clegg on the subject DEIS.

We believe there is a bit of confusion relating to this EIS which should be clarified. Initially the applicant published a prep notice for an EIS pertaining to a specific project on its lands as part of a Development Plan (DP) amendment request.

An EIS for the General Plan (GP) change is being done to comply with the Environmental Council's Declaratory Ruling No. 86-1. While this ruling states that an EIS is needed for a GP change, it also anticipated that (Item 13) "If all the specific details of a project are not available at the general plan stage, then the environmental impact statement ... need not be voluminous. When sufficient details become available, the accepting authority can then require the preparation of a supplemental environmental impact statement ..." After consultation with OEQC and DGP, we have prepared the EIS for this GP amendment on a non-project specific basis.

We believe that we have prepared the General Plan EIS in a manner which follows the guidelines given us by the Environmental Council. As you are aware, adoption of a General Plan amendment would permit Development Plan amendment proposals from any applicant, not just the one that has a pending...
Mr. Niels Stoermer  
January 21, 1987  
Page 2

Development Plan EIS prep notice. That is why the application maintains its separate status.

Again, thank you for your comments.

Sincerely,

Barry R. Okuda

BRO:awp