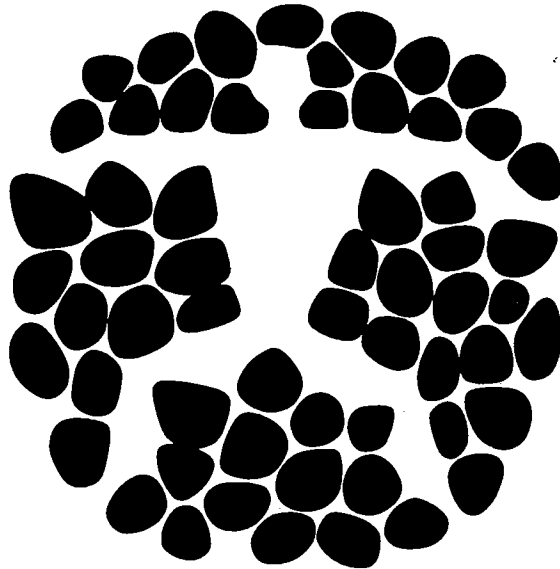


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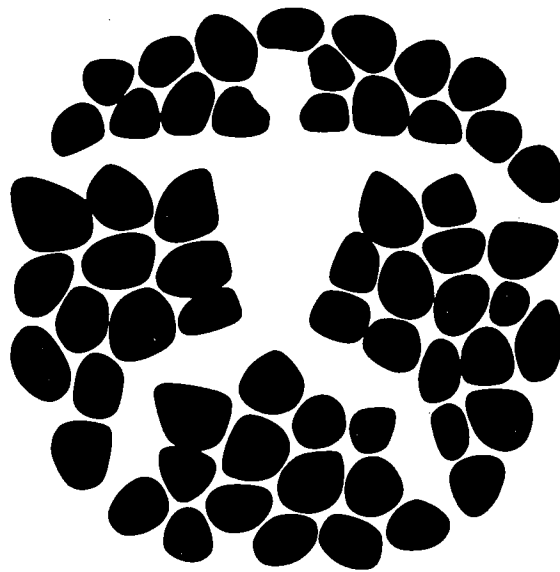
Punalu'u Resort



Volume II
Final Environmental Impact Statement
Punalu'u, Ka'u District, County of Hawaii

April 1988

Punalu'u Resort



Volume II

Final Environmental Impact Statement

Punalu'u, Ka'u District, County of Hawaii

April 1988

Prepared For:

C. Brewer Properties, Inc.

P.O. Box 1826 Honolulu, Hawaii 96805

Prepared By:

PBR Hawaii

130 Merchant Street, Suite 1111 Honolulu, Hawaii 96813

VOLUME II

FORWARD

This Environmental Impact Statement has been prepared for C. Brewer Properties, Inc. to disclose information on its Punalu'u Resort situated on that certain property at Punalu'u, Ka'u on the Island of Hawaii.

The preparation and submittal of this document is pursuant to Hawaii Revised Statutes, Chapter 343, Environmental Impact Statements, Chapter 200 of Title 11, Environmental Impact Statement Rules, and Chapter 200 of Title 11, Environmental Council Rules of Practice and Procedure.

The County of Hawaii Planning Department reviewed the environmental assessment for a General Plan Amendment Application, which was prepared by PBR HAWAII, and determined that an Environmental Impact Statement is required. The Environmental Impact Statement Preparation Notice appeared in the OEQC Bulletin dated September 8, 1987 and September 23, 1987. The deadline for requests to be a consulted party was October 8, 1987.

A Draft Environmental Impact Statement (EIS) and Final Environmental Impact Statement were prepared and submitted for Punalu'u Resort in October 1986 and January 1987, respectively. Due to issues raised prior to acceptance of the Final EIS by the County of Hawaii Planning Department, C. Brewer Properties, Inc. withdrew the EIS from consideration. Subsequent to withdrawing the Final EIS, C. Brewer Properties, Inc. has revised the master development plan to respond to community concerns and prepared a Draft EIS for that revised Master Plan. The Draft EIS was published in December 1987 and notice of its availability was published in the OEQC Bulletin dated December 8, 1987. The deadline for submittal of review comments on the Draft EIS was January 22, 1988. Comments received and responses thereto are included in Volume II, Chapter XII of this Final EIS.

As noted in the Table of Contents, this Final EIS has been separated into two volumes (Volume I and Volume II) to accommodate the inclusion of all comment letters and responses relative to the EIS Preparation Notice and Draft EIS.

For clarification purposes, the following identifies the major elements of the Revised Punalu'u Resort Master Plan vis-a-vis the Master Plan described in the October 1986 and January 1987 EIS's that were withdrawn by C. Brewer Properties, Inc.

1. Ninole Cove Hotel deleted from Master Plan and replaced by the Village Hotel which will be located on the bluff overlooking the ocean and coastal plain.

2. Ninole Cove restoration deleted from the proposed project because it is no longer necessary to the Master Plan and because of complex and costly permitting procedures.
3. The total number of hotel/condominium units presently planned ranges from 740 to 1,035 units that would occupy approximately 48 acres or 11 percent of the total Resort area and representing a density of 16 to 22 units per acre versus the previously proposed 805 to 1,430 units on 45 acres or 10 percent of the Resort area and representing a density of 18 to 32 units per acre.
4. To accommodate the relocation of Ninole Cove Hotel to the central bluff area, the realigned Punalu'u Road has been adjusted.
5. Two new golf holes (Nos. 8 and 9) would be located on the coastal plain versus one golf hole previously planned.
6. A new vehicular access road and parking area would be constructed on the east side of Ninole Cove to provide vehicular access to the shoreline on the west side of the Resort.

VOLUME II
PUNALU'U RESORT
FINAL ENVIRONMENTAL IMPACT STATEMENT

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Chapter XI: Consulted Parties, Comments And Responses During Consultation Period

CHAPTER XI

CONSULTED PARTIES, COMMENTS AND RESPONSES

DURING THE CONSULTATION PERIOD

1. CONSULTED PARTIES

The notice of availability of the Environmental Impact Statement Preparation Notice (EISPN) for Punalu'u Resort development was published in the OEQC Bulletin by the Office of Environmental Quality Control on September 8, 1987. The agencies, organizations and individuals listed below were sent copies of the EIS Preparation Notice and were requested to comment on the project (refer to Sample Letter and EISPN). Everyone believed to have an interest in the project or who requested consulted party status was included in the mailing. Those who responded within the 30 days to the request for comments are marked with an asterisk (*) and copies of the correspondence with them is included in this Chapter. Additional correspondence received after the October 8, 1987 deadline is marked with two asterisks (**) and copies of the correspondence is also included in this Chapter.

Federal Agencies

- * U.S. Army Corps of Engineers, Pacific Ocean Division
- ** Department of Agriculture, Soil Conservation Service
- ** Department of Commerce, National Marine Fisheries Service - Honolulu
- Department of Energy
- Department of Health, Education and Welfare
- ** Department of Housing and Urban Development
- ** Department of Interior - Fish and Wildlife Service
- * Department of Interior - Geological Survey, Water Resources Division
- Department of Labor, Occupational Safety and Health Administration
- Department of Transportation - Federal Aviation Administration
- Department of Transportation - U.S. Coast Guard
- Environmental Protection Agency

State Agencies

- * Department of Accounting and General Services
- * Department of Agriculture
- * Department of Business and Economic Development
- * Department of Budget and Finance
- * Department of Defense
- * Department of Education
- Department of Hawaiian Home Lands
- ** Department of Health
- Department of Labor and Industrial Relations
- ** Department of Land and Natural Resources
- Department of Planning and Economic Development
- Department of Social Services and Housing
- ** Department of Taxation
- ** Department of Transportation
- ** Office of Environmental Quality Control
- * Office of the Governor
- * Office of Hawaiian Affairs

Congressional Representatives

- ** The Honorable Daniel K. Inouye
- The Honorable Spark M. Matsunaga
- The Honorable Daniel K. Akaka
- The Honorable Patricia Saiki

State Legislatures

- Senator Richard Henderson
- Senator Richard M. Matsuura
- Senator Malama Solomon
- Representative Virginia Isbell
- Representative Andrew Levin
- Representative Michael O'Kieffe
- * Representative Wayne Metcalf
- Representative Harvey Tajiri
- Representative Dwight Takamine

Hawaii County

- Mayor Dante K. Carpenter
- Planning Department
- Department of Public Works
- * Department of Parks and Recreation
- * Department of Water Supply
- * Department of Research and Development
- * Fire Department
- Office of Housing and Community Development

- Safety Coordinator
- Civil Defense Agency
- Finance Department
- * Hawaii Redevelopment Agency
- * Police Department

Hawaii County Council

- * James K. Dahlberg
- Frank De Luz, III
- Takashi Domingo
- Robert Herkes
- Lorraine Jitchaku-Inouye
- Russell Kokubun
- Merle K. Lai
- Spencer Kalani Schutte
- Stephen K. Yamashiro

Public Utilities

Hawaii Electric Light Company
Hawaiian Telephone
Gasco, Inc., Hawaii Division

Community Organizations, Individuals, and Other Public Interest Groups

- Hawaii Island Chamber of Commerce
- Big Island Business Council
- Hawaii Hotel Association
- Hawaii Visitors Bureau - Hawaii Island Chapter
- Life of the Land
- Moku Loa Group, Hawaii Chapter Sierra Club
- Ka'u Historical Society
- Japanese Chamber of Commerce
- Kona/Kohala Chamber of Commerce
- Hawaii Portugese Chamber of Commerce
- International Long Shoremen's Warehousemen Union, Hawaii Division
- Hilo Hawaii Visitor's Industry Association
- ** Hawaii Audubon Society
- Hawaiian Civic Club of Ka'u
- Ka Ohana O Kalae
- Hui O Kokua
- Ka'u Roping and Riding Club
- Na'alehu Community Club
- Pahala Community Association
- Ka'u Lions Club
- Ka'u High School
- Naalehu Elementary School

- Ka'u Hospital
- Colony I Homeowners Association
- Alu Like
- Board of Realtors - Island of Hawaii
- Rotary Clubs - Island of Hawaii
- ** Glen M. Winterbottom
- ** International School of Beijing
- Hawaii Island Economic Development Board
- * Native Hawaiian Legal Corporation
- * Hawaii Conference Foundation

2. COMMENTS AND RESPONSES DURING CONSULTATION PERIOD

The following table summarizes all letters received (including phone calls) and displays them in two categories; substantive and non-substantive. Substantive letters raised specific concerns that should be addressed in preparation of the EIS while non-substantive letters expressed either "no comment" or simply requested to be included as consulted parties. The letters appear in the same order as they are listed below.

**TABLE XI-1
PUNALU'U RESORT EISPN SUMMARY OF COMMENTS RECEIVED**

NAME/ AGENCY OF RESPONDENT	DATE OF LETTER	DATE OF PDR RESPONSE	CONTENTS: NON-SUBSTANTIVE	CONTENTS: SUBSTANTIVE	WRITER'S TOPIC OF CONCERN
LESLIE PYUN/ OFFICE OF HAWAIIAN AFFAIRS	3/23/87	10/13/87	X		
FRANCIS SMITH/ COUNTY FIRE DEPARTMENT	4/17/87	10/ 6/87		X	FOLLOW-UP FROM PREVIOUS LETTER
FRANCIS SMITH/ COUNTY FIRE DEPARTMENT	9/17/87	10/29/87		X	FIRE PROTECTION INFO, RECOMMENDS AUTOMATIC SPRINKLER SYSTEM FOR ALL FOR STRUCTURES
TEUANE TOMINAGA/ STATE DEPT OF ACC & GEN SERV	9/17/87	10/ 6/87	X		
JERRY MATSUDA/ STATE DEPARTMENT OF DEFENSE	9/17/87	10/ 6/87	X		
M. WILLIAM SEWAKE/ COUNTY DEPT OF WATER SUPPLY	9/18/87	10/ 6/87		X	ADEQUACY OF EXISTING WATER SYSTEM FACILITIES FOR CURRENT AND FUTURE NEEDS
YUKIO TAKEMOTO/ STATE DEPT OF BUDGET & FINANCE	9/21/87	10/ 6/87	X		
PATRICIA ENGELHARD/ COUNTY PARKS & RECREATION	9/21/87	10/ 6/87	X		
WAYNE CARYALHO/ COUNTY POLICE DEPARTMENT	9/21/87	10/ 6/87	X		
COUNCILMEMBER JAMES DAHLBERG HAWAII COUNTY COUNCIL	9/22/87	10/ 6/87	X		
LIVIA HANG/ NATIVE HAWAIIAN LEGAL CORPORATION	9/23/87	10/ 6/87	X		
GORDON MBRIGA/ COUNTY HAWAII REDEVELOPMENT AGENCY	9/25/87	10/ 6/87	X		
RUSSELL FUKUMOTO/ STATE BUSINESS & ECONOMIC DEV	9/28/87	10/ 6/87		X	PROJECTED HOUSING DEMAND AND PROVISIONS FOR EMPLOYEE HOUSING
JAMES RICHARDS/ HAWAII CONFERENCE FOUNDATION	9/28/87	10/ 6/87	X		
WILLIAM MEYER/ DEPT OF INTERIOR, GEOLOGICAL SURVEY	9/28/87	10/ 6/87		X	INCREASE MONITORING OF WATER WELLS
CHARLES TOGUCHI/ STATE DEPARTMENT OF EDUCATION	9/30/87	10/ 6/87		X	EXISTING SCHOOLS OPERATING AT NEAR CAPACITY
DENNIS YAMAMOTO/ COUNTY DEPT OF RESEARCH & DEV	9/30/87	10/ 6/87	X		
CLARENCE FUJII/ DEPARTMENT OF THE ARMY	10/ 5/87	10/13/87		X	FIRM MAPS
REPRESENTATIVE WAYNE HETCALF HOUSE OF REPRESENTATIVES	10/ 5/87	10/13/87	X		
SUZANNE PETERSON/ STATE DEPARTMENT OF AGRICULTURE	10/ 5/87	10/13/87	X		
JOSHUA AGSALUD/ GOVERNOR'S OFFICE	10/ 6/87	10/13/87	X		
RICHARD DURCAN/ DEPARTMENT OF AGRICULTURE	10/ 9/87	10/13/87	X		
JOHN HAUGHTON/ DEPT OF COMMERCE, MARINE FISHERIES	10/ 9/87	10/13/87		X	PROTECTION OF HAWKSBILL AND GREEN TURTLES, CONTINUED DEVELOPMENT OF PUNALU'U RESORT EPP
NAE MULL/ HAWAII AUDUBON SOCIETY	10/ 9/87	10/13/87		X	IMPACTS ON NATIVE WILDLIFE AND PLANT COMMUNITIES, LAND USE DESIGNATIONS
CALVIN LEW/ DEPT OF HOUSING & URBAN DEVELOPMENT	10/ 9/87	10/13/87		X	EMPLOYEE HOUSING
SENATOR DANIEL INOUE UNITED STATES SENATE	10/13/87	10/16/87	X		
BRUCE ANDERSON/ STATE DEPARTMENT OF HEALTH	10/13/87	10/16/87		X	AIR AND WATER POLLUTION, DRINKING WATER
LAWRENCE YAKANO/ STATE DEPARTMENT OF TAXATION	10/14/87	10/16/87	X		
COUNCILMEMBER JAMES DAHLBERG HAWAII COUNTY COUNCIL	10/15/87		X		
EDWARD HIRATA/ STATE DEPARTMENT OF TRANSPORTATION	10/15/87	10/16/87		X	TRAFFIC IMPACT ANALYSIS REPORT
ERNEST KOSAKA/ DEPT OF INTERIOR, FISH & WILDLIFE	10/15/87	10/16/87		X	COASTAL WETLANDS, EPP, FISHING RESTRICTIONS
MARVIN MIURA/ STATE ENVIRONMENTAL QUALITY CONTROL	10/15/87	10/16/87		X	ENVIRONMENTAL PROTECTION MEASURES, GOLF COURSE IRRIGATION WATER, LIVERNORT DISCOVERY, FAUNAL, COASTAL AND MARINE SURVEYS, ARCHAEOLOGICAL SITES AND TRAFFIC AND SOCIAL IMPACTS
DAVID PENN/ INTERNATIONAL SCHOOL OF BEIJING	10/21/87	10/21/87	X		
WILLIAM PATY/ STATE DEPT OF LAND & NATURAL RES	10/21/87	10/21/87		X	AQUATIC RESOURCES, HISTORIC SITES, WATER AND LAND DEVELOPMENT, FORESTRY AND WILDLIFE
GLEN WINTERBOTTOM	11/ 9/87		X		
FRANCIS SMITH/ COUNTY FIRE DEPARTMENT	11/10/87			X	FOLLOW-UP FROM PREVIOUS LETTER
REED FLICKENGER/ WEST HAWAII TODAY	phone call	10/13/87	X		



COUNTY OF HAWAII

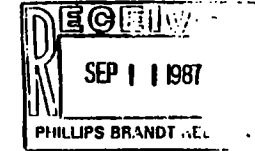
PLANNING DEPARTMENT

25 AUPUNI STREET • HILO, HAWAII 96720 (808) 961-8288

DANTE K. CARPENTER Mayor

ALBERT LONO LYMAN Director

TIM LUT-KWAN Deputy Director



August 31, 1987

Phillips Brandt Reddick

September 11, 1987

SAMPLE LETTER

The Honorable Mayor Dante K. Carpenter
Hawaii City and County
25 Aupuni Street
Hilo, Hawaii 96720

Subject: Punalu'u Resort
Environmental Impact Statement Preparation Notice (EISPN)

Honorable Mayor Dante K. Carpenter:

Enclosed for your review and comment is C. Brewer Properties, Inc. Preparation Notice for the Punalu'u Resort Draft Environmental Impact Statement. As indicated in the Notice, the Resort Master Plan has been revised to minimize potential impacts to the coastal areas and improves land use efficiency and the Resort's potential for long-term economic viability. The increased economic viability of the Resort translates into increased population levels and increased employment and economic opportunities for the residents of Ka'u District.

The project and the anticipated impacts and mitigation measures are described in the attached Notice. Upon publication of the Preparation Notice in the September 8th OEQC Bulletin, agencies, groups, or individuals shall have a period of 30 days in which to request to become a consulted party and to make written comments regarding the environmental effects of the proposed action.

Any written comments on the EISPN should be sent to the following address no later than October 8, 1987 with a copy sent to the Planning Director, County of Hawaii.

PBR HAWAII
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813
Attention: Mr. Thomas S. Witten, ASLA

Very truly yours,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

Office of Environmental Quality Control
465 S. King Street
Rekuanaoa Building, Room 115
Honolulu, Hawaii 96813

Gentlemen:

Notice of Preparation of an EIS
Punalu'u Resort
Punalu'u, Ka'u, Island of Hawaii

Enclosed please find an original and four (4) copies of an environmental assessment and preparation notice of determination for the proposed Punalu'u Resort.

Requirements under Chapter 343, Hawaii Revised Statutes, are being triggered by the filing of a General Plan Amendment petition by the applicant, C. Brewer Properties, Inc.

Comments on the EIS Preparation Notice should be sent directly to the consultant:

Mr. Thomas S. Witten, ASLA
PBR - Hawaii
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

With copies to:

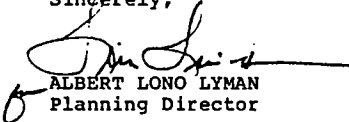
Mr. Albert L. Lyman, Director
Planning Department
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

IX
-
9

Office of Environmental Quality Control
Page 2
August 31, 1987

Should you have any questions, please feel free to contact our office.

Sincerely,



ALBERT LONO LYMAN
Planning Director

AK

Enclosures

cc: Mr. Thomas S. Witten (w/encl.)

ENVIRONMENTAL ASSESSMENT AND NOTICE OF PREPARATION
OF AN
ENVIRONMENTAL IMPACT STATEMENT

PUNALU'U RESORT
Ka'u District, Island of Hawaii

I. APPLICANT:

C. Brewer Properties, Inc.
P.O. Box 1926
Honolulu, Hawaii 96805

CONSULTANT:

PBR Hawaii
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

II. ACCEPTING AUTHORITY:

Planning Department
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

III. CLASS OF ACTION

General Plan Amendment petition to redesignate a portion of the mauka area of the Resort from Low Density Urban to Medium Density Urban and Open Area.

IV. PROJECT DESCRIPTION

A. Location and Ownership

Punalu'u Resort (previously known as SeaMountain at Punalu'u) is comprised of approximately 433 acres, is located on the southeastern coast of the island of Hawaii, Ka'u Judicial District, Punalu'u (Figures 1 and 2). The property is identified as TMK's 9-5-19:11, 15, 24, 26, 30, 31, 33, 35; 9-6-01:01 to 03, 06, 11 to 13; and 9-6-02:08, 37, 38, 41 and 45. The site is approximately five miles south of Pahala town and seven miles north of Na'alehu town.

The Resort (Figure 3) is situated mauka (approximately 108 acres) and makai (approximately 325 acres) of the Hawaii Belt Highway and extends to the coastline at Punalu'u Bay and Ninole Cove. It is bounded on both sides by vacant land: state-owned to the south and

Kamehameha Schools/Bishop Estate lands to the north. The property is owned by C. Brewer Properties, Inc. except for six parcels located at Punalu'u Bay that are owned by four landowners and a cemetery/chapel parcel that is owned by the United Church of Christ, Hawaii Conference.

B. Development Plan

C. Brewer Properties, Inc. has submitted a petition for General Plan Amendment for approximately 65 acres of the mauka area of the resort, Change of Zone applications for the rezoning of Punalu'u Resort, and Special Management Area (SMA) Use Permit petitions for infrastructure modifications and site improvements to a portion of the 433-acre Punalu'u Resort at Punalu'u, Ka'u, Hawaii.

The proposed amendment to the General Plan Land Use Pattern Allocation Guide (LUPAG) map includes the redesignation of approximately 65 acres from Low Density to Medium Density and Open Area, mauka of the Hawaii Belt Highway. This amendment will allow for subsequent zoning of the area for a mixture of single-family residential lots and multi-family residential units around the existing golf course. Figure 5 shows the proposed county General Plan Land Use Pattern Allocation Guide Map.

The overall resort concept involves creating a Village Center on the bluff overlooking the ocean and two proposed shoreline golf holes. The Village Center development is accomplished by relocating four golf holes and the coastal section of Punalu'u Road. The plan improves and provides for additional development parcels with increased golf and recreational amenity frontage and/or ocean views. Resultant development parcels include a mixture of single-family residential, multi-family residential, mixed-use multi-family, commercial, hotel, and open space recreational amenities.

The revised Punalu'u Resort Master Plan (Figure 6) minimizes potential impacts to the coastal areas and improves land use efficiency and consequently the Resort's potential for long-term economic viability. Improved land use efficiency and long-term economic viability result from design of resort features that increase the quality of the resort experience by unifying the Resort and providing a cohesive "sense of place" at a human/village scale and by providing the "critical mass" of amenities required that attract visitors to the Resort.

The major portion of the Punalu'u Resort (approximately 325 acres) lies on the makai side of the Hawaii Belt highway and is within the Special Management Area (SMA) designated by the County of Hawaii.

The Resort, projected to be completed within 15 years, will include improvements within the SMA and modify the existing infrastructure to provide for the reallocation of density to conform to the natural features of Punalu'u. In total, the revised Punalu'u Resort development as proposed will include the land use and density allocations as follows, contingent upon subsequent governmental agency approvals:

General Land Use Allocation (1990 - 2005)

	<u>Approximate Acres</u>	<u>Planned Units</u>
Resort Hotel Rooms	17	450 - 560
Hotel/Condominium Units	20	260 - 600
Multi-family Residential Units	124	1240 - 1860
Single-family Residential Lots	45	70 - 80
Village Commercial/Services	15	---
Golf Course, Open Space & Roads	<u>212</u>	<u>---</u>
Total:	433	2020 - 3100

The actions proposed to be taken in the initial development phase include:

1. Creating a low-rise, mixed-use village complex including 260-600 hotel/condominium units and 65,000 square feet of commercial use space (shops and restaurants) located along the central bluff (Punalu'u Village);
2. Developing a 300 - 350 room hotel adjacent to and integrated with Punalu'u Village (Village Hotel);
3. Developing a 150 - 210 room hotel/inn to be integrated with the existing Punalu'u Black Sand Restaurant (Punalu'u Black Sand Inn);
4. Creating a Water Play Area within Punalu'u Village as the primary "water contact" area for visitors and residents that will include a large pool area with sand areas, walkways and decks flanked by lush tropical landscaping;
5. Demolition of roadways that are to be abandoned/realigned and construction of approximately 6,800 lineal feet of Punalu'u Road and Ninole Cove Place;
6. Modifying the golf course, including construction of five golf holes that are to be relocated within the Resort, including two ocean front golf holes (8th and 9th);

7. Providing infrastructure for and site preparation of multi-family residential sites within the central area of the Resort. (When specific site development plans have been completed, additional SMA permits will be required for each project.);
8. Developing a multi-use recreation complex/spa and expanded golf clubhouse;
9. Expanding the existing Punalu'u Beach Park and coastal recreation area, providing a new access road to Punalu'u Beach Park, and constructing additional parking and recreation facilities;
10. Reconfiguring and expanding the existing Ninole Cove Park and coastal recreation areas, including shoreline trails and landscape improvements, and constructing additional parking and recreation facilities;
11. Adding additional tennis courts and other resort support facilities and amenities; and,
12. Consolidating and subdividing of the resort lands into parcels to facilitate development of the resort.

The project will modify existing conditions of the back-shore area while protecting important natural resources which are an integral part of the project area. Pedestrian access will be provided along the entire shoreline with additional public parking added to Punalu'u Beach Park and Ninole Cove Park. No work is being proposed within Ninole Cove nor the 40-foot shoreline setback area.

V. DESCRIPTION OF AFFECTED ENVIRONMENT

A. Setting

Punalu'u Resort is located in the Ka'u District on the island of Hawaii (Figure 1). Ka'u District stretches from Hawaii Volcanoes National Park, approximately 30 miles northeast of Punalu'u to South Kona District, approximately 25 miles west of Punalu'u (Figure 2). Ka'u District has an estimated population of approximately 4,475 persons. The District is primarily a rural agricultural area with sugar, macadamia nuts, cattle raising and limited commercial fishing accounting for most primary employment. Punalu'u Resort, which is about five miles south of Pahala town and seven miles north of Na'alehu town, currently employs 60 to 65 persons, including those employed at the Black Sand Restaurant, and is the only resort destination currently operating in Ka'u.

The project area consists of approximately 433 acres, the majority of which (325 acres) are located on the makai side and about 108 acres located on the mauka side of the Hawaii Belt Highway. The Resort lands makai of the highway are in the county designated Special Management Area (SMA). The Resort property which is State Land Use Urban designation has about 4,000 lineal feet of ocean frontage between Punalu'u Harbor and Ninole Cove.

Punalu'u Resort was started in 1972 and presently includes an 18-hole championship golf course and associated clubhouse, the 76-unit Colony I condominiums, Black Sand Restaurant, Aspen Institute for Humanistic Studies, four tennis courts and a convenience store, Ka'u Center of History and Culture and, on the mauka side of the Hawaii Belt Highway, the 19-lot Kalana I single-family residential subdivision. In addition, a substantial portion of the Resort infrastructure and facilities have been developed, including Public Utilities Commission regulated underground water distribution system, sewage collection and self-contained reclamation and secondary sewage treatment plant, underground telephone and cable TV systems, drainage system and structures and privately owned internal roadways (Figure 3).

Geologically, the entire area is underlain by ancient and recent volcanic flows separated by layers of volcanic ash. Average annual rainfall in the Resort area is approximately 30 inches and winds are predominately trades from the northeast with stronger breezes experienced between June and August. There is little seasonal or diurnal temperature variation in the project area. Large quantities of nutrient rich basal ground water, some of which is of sufficient quality for drinking and agricultural purposes flow beneath the Resort area. It is estimated by the USGS that approximately 30 million gallons per day of basal ground water is discharged into the ocean fronting the Resort.

B. Coastal Ponds and Marine Environment

1. General -- Two coastal pond and marine surveys have been conducted for the proposed project. In general, the Resort coastline is subjected to severe natural stresses in the form of nutrient rich basal ground water outflow, heavy surf and surge conditions and strong outward flowing water currents. These factors tend to reduce and/or cause significant variations in the population densities and diversity of marine organisms found within the project area.

2. Coastal Ponds -- There are three coastal ponds at Punalu'u, none of which are classified as anchialine (Figure 7). The ponds currently serve as recreational and limited subsistence fishing areas for local residents. Pond No. 1 is currently directly connected to the ocean and has an estimated low tide outflow of about 20 cubic feet per second. Pond No. 2, which was connected to Ninole Cove, has become landlocked as a result of heavy winter storms that have also filled Ninole Cove with sediment and debris. Punalu'u Lagoon (Pond No. 3) is biologically, chemically and physically stressed having been subjected to the introduction of exotic species (fish, prawns and domestic ducks) and receives vast quantities of leaf litter from surrounding vegetation. All of the ponds are subjected to basal ground water inflow and, consequently, are brackish in character. Pond No. 1 will be secondarily affected by the proposed project through environmental protection measures. Pond No. 2 will not be affected by the proposed project. No modifications, alterations or filling of the coastal ponds are planned.

3. Marine Environment -- The proposed project offshore (intertidal, near-shore and offshore) areas are characterized by intertidal and subtidal freshwater springs and one major surface water discharge from a large spring-fed pond. These discharges account for a wide variation in the physical and chemical properties of the waters and the relatively low to moderate diversity of marine organisms. The offshore areas will be unaffected by the proposed project, except for the continued outflow of basal ground water, the application of secondary treated wastewater and the use of herbicides and pesticides on the golf course and their eventual entrance into the offshore waters via the basal ground water outflow.

C. Flora and Fauna

1. Flora -- The flora within the Resort is composed largely of exotic (introduced) species due to the development of residential and recreational facilities. Limited stands of native plants occur within the Resort. However, the only portion of the project site where native plants form the dominate cover is along the coast. The native plants found on the site also occur scattered throughout the Ka'u region. There are four broadly defined vegetation types within the Resort: (1) Koa-haole scrub; (2) open scrub; (3) strand; and (4) wetland. No rare, endangered or threatened species of plants are found on the project site. However, a new species of liverwort (bryophyte) has been found near the shoreline of the Resort. Landscaping for the proposed

project would include the use of native and indigenous plants whenever possible and the use of native wetland and coastal plants around proposed coastal area (golf course, beach park and coastal pond) improvements. The use of native and indigenous plants would enhance the vegetative character of the project site. A few native palms, found in some of the presently landscaped areas, will be protected and measures will be taken to protect and improve the wetland and strand vegetation.

2. Fauna -- There are five basic faunal habitats within the project area, each defined in part by associated plant habitats. The faunal habitats include (1) Koa-haole and Monkeypod scrub; (2) golf course; (3) resort area; (4) grassland and coastal zone; and (5) brackish pond habitats. No rare, endangered or threatened species of birds or mammals were observed in the project area during faunal surveys. However, it is unofficially reported that several endangered or threatened species may frequent the project area, including the Hawaiian duck, Hawaiian coot, Hawaiian black-necked stilt, Hawaiian hawk and the Hawaiian hoary bat. Punalu'u is reportedly the seasonal home for several species of migratory birds, including Golden plovers, Ruddy turnstone and Wandering tattler. However, none were sighted during the faunal survey. Offshore, several protected species occur, including green turtles, Hawaiian hawksbill turtle, various dolphins and whales and possibly the Hawaiian Monk seal. In general, because of the improvements and additions to the vegetation of the project site and the environmental protection measures that will be taken, the impacts to the fauna of the area are expected to be positive and beneficial. Protected species will benefit from implementation of an environmental protection plan, predator control programs and displays describing the importance of the ecology of the area and the need to protect and preserve the ecological setting.

D. Historical/Archaeological Resources

Ka'u is rich in Hawaiian history and archaeological sites that evidence the large Hawaiian population that once farmed and fished there. Ka'u is thought by some to have been the original landing place of the first Polynesian settlers in the Hawaiian Islands. The coastal areas in particular have large numbers of ancient house sites, villages, trails, heiaus and other remains of the early Hawaiians. Several archaeological investigations have been conducted within the Punalu'u Resort project area, the latest of which (1986), identified a total of 32 archaeological sites. Twenty-five of these sites had been previously identified and seven were newly

identified. The existing sites within the project area are representative of the range of feature types found in Hawaii. There are platforms, enclosures, terraces, rock shelters, walls and petroglyphs that appear to be prehistoric in origin. Two large heiaus, one to the southeast (Kane'ele'ele) and one to the southwest (Kaieie), both of which are outside the project boundaries, dominate the immediately visible archaeological resources of the area. Another heiau, Lanipao, is located within the project boundaries and another complex, also within the project boundaries, has been functionally identified as a heiau. In addition, a fishing shrine is located south of Punalu'u Bay and a petroglyph cluster, and other single figure and a historic tomb are located within the project boundaries. The archaeological resources of the project area will be protected through the development and implementation of a Cultural Resources Management Plan and the preservation and/or recordation of significant sites per existing federal, state and county regulations prior to construction activities. Many of the archaeological sites will be incorporated into the proposed project through an interpretative educational program. Public access to all culturally and archaeologically significant sites will be maintained.

E. Soils

Developed portions of the project site have modified existing soil types and conditions. According to the USDA Soil Conservation Service, there are four general soil types within the project site: (1) Lava flows - A'a; (2) Lava flows - Pahoehoe; (3) Punalu'u Series - organic soils over pahoehoe lava; and (4) Very stony land. There are no Agricultural Lands of Importance to the State of Hawaii (ALISH) designations within the resort area. The Land Study Bureau maps identify land type D290 as the only soil within the project site. This rating indicates that the land is poorly suited for agriculture.

VI. SUMMARY OF MAJOR IMPACTS AND MITIGATION MEASURES

Implementation of the proposed resort master plan (Figure 6) will involve grading, vegetation removal and replacement, modifications to the present infrastructure including additions to the underground utilities, construction of 450 to 560 hotel rooms, 260 to 600 hotel/condominium (village) units, 1,240 to 1,860 multi-family residences, 70 to 80 single-family residences, realigned and modified golf holes, and resort support facilities. The potential exists for significant effects, including the following, many of which are considered beneficial:

- o Reconfiguration of the terrain due to grading and landscaping;
- o Change in the visual character of the site due to new landscaped areas, hotels, multi-family residences, commercial spaces and new recreational areas;
- o Airborne dust and noise during the construction period;
- o Use of treated sewage for golf course irrigation with resulting potential increased nutrient loading in the coastal ponds and immediate offshore areas;
- o Impacts on historical and archaeological sites that will be mitigated through recordation, preservation and management;
- o Improved access and increased use of Punalu'u Harbor and Punalu'u Beach Park;
- o Increased use of available potable water supplies, public utilities and services;
- o Increased short-term and long-term employment;
- o Increased population levels;
- o Increased personal income and business activity;
- o Increased employee demand for housing;
- o Increased governmental revenues and expenditures; and,
- o Increased demand on public services.

VII. DETERMINATION OF SIGNIFICANCE

Pursuant to Chapter 343 HRS, as amended, a request for a General Plan Amendment has been submitted to the Hawaii County Planning Department. Since the project, as a whole, may have a significant effect on the environment, an Environmental Impact Statement (EIS) will be required for the Punalu'u Resort. The EIS will supplement and support Change of Zone applications; Special Management Area (SMA) Permit applications for site improvements; and Department of the Army (Corps of Engineers) Permit applications, as required, to implement the Resort Master Plan.

The proposed project has the potential of significantly altering the environment. Therefore it is determined that the preparation of an Environmental Impact Statement is warranted. The reasons supporting this determination, which are based on the significance criteria in Section 11-200-12 of the Environmental Quality Commission EIS Rules, are as follows:

- A. The proposed action may involve an irrevocable commitment of resources.
- B. The proposed action may involve substantial secondary impacts, such as population changes or effects on public facilities.
- C. The proposed action is individually limited, but cumulatively may have an effect upon the environment or involve a commitment for larger actions.
- D. The proposed action may affect a rare, threatened, or endangered species of animal or plant or its habitat.
- E. The proposed action is likely to affect coastal water quality.

VIII. PARTIES TO BE CONSULTED FOR THE PREPARATION OF THE EIS

The agencies and organizations listed below will be sent copies of the EIS Preparation Notice (EISPN) and requested to comment on the proposed project.

Federal Agencies

- U.S. Army Corps of Engineers, Pacific Ocean Division
- Department of Agriculture, Soil Conservation Service
- Department of Commerce, National Marine Fisheries Service - Honolulu
- Department of Energy
- Department of Health, Education and Welfare
- Department of Housing and Urban Development
- Department of Interior - Fish and Wildlife Service
- Department of Interior - Geological Survey, Water Resources Division
- Department of Labor, Occupational Safety and Health Administration
- Department of Transportation - Federal Aviation Administration
- Department of Transportation - U.S. Coast Guard

State Agencies

- Department of Accounting and General Services
- Department of Agriculture
- Department of Budget and Finance
- Department of Defense
- Department of Education
- Department of Hawaiian Home Lands
- Department of Health
- Department of Labor and Industrial Relations
- Department of Land and Natural Resources
- Department of Planning and Economic Development
- Department of Social Services and Housing

Department of Taxation
Department of Transportation
Office of Environmental Quality Control
Office of the Governor
Office of Hawaiian Affairs

Congressional Representatives

The Honorable Daniel K. Inouye
The Honorable Spark M. Matsunaga
The Honorable Daniel K. Akaka
The Honorable Patricia Saiki

State Legislatures

Senator Richard M. Matsuura
Senator Malama Solomon
Representative Virginia Isbell
Representative Andrew Levin
Representative Michael O'Kieffe
Representative Wayne Metcalf
Representative Harvey Tajiri
Representative Dwight Takamine

Hawaii County

Mayor Dante K. Carpenter
Planning Department
Department of Public Works
Department of Parks and Recreation
Department of Water Supply
Department Research and Development
Fire Department
Office of Housing and Community Development
Safety Coordinator
Civil Defense Agency
Finance Department
Hawaii Redevelopment Agency
Police Department

Hawaii County Council

James K. Dahlberg
Frank De Luz, III
Takashi Domingo
Robert Herkes
Lorraine Jitchaku-Inouye
Russell Kokubun
Merle K. Lai
Spencer Kalani Schutte
Stephen K. Yamashiro

Public Utilities

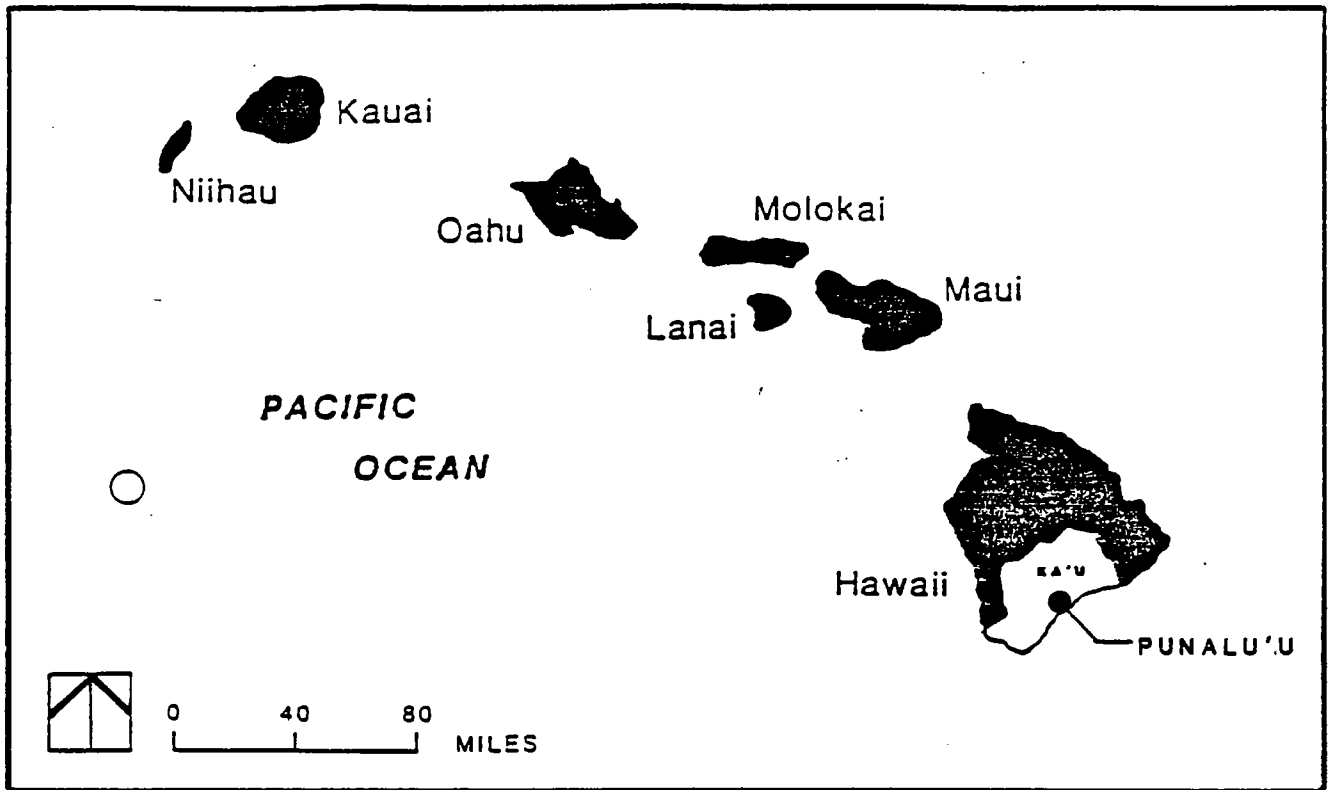
Hawaii Electric Light Company
Hawaiian Telephone
Gasco, Inc., Hawaii Division

Community Organizations and Other Public Interest Groups

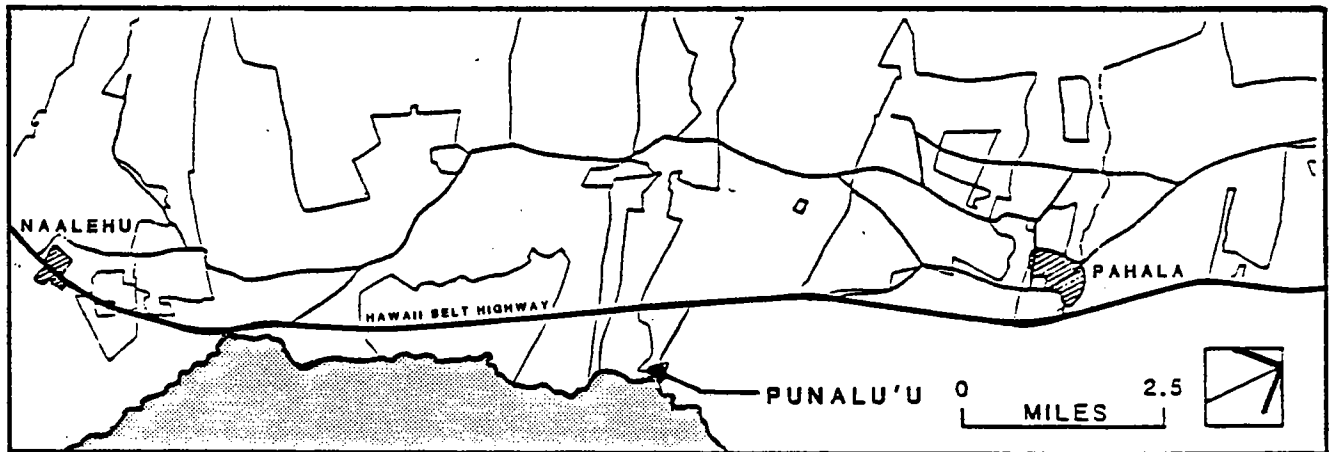
Alu Like
Audubon Society - Hawaii Chapter
Big Island Business Council
Big Island Chamber of Commerce
Board of Realtors - Island of Hawaii
Colony One Homeowners Association
Hawaii Conference Foundation
Hawaii Hotel Association
Hawaii Visitors Bureau - Big Island Chapter
Hawaiian Civic Club of Ka'u
Hilo Hawaii Visitor Industry Association
Hui O Kokua
ILWU
Japanese Chamber of Commerce
Ka Ohana O Kalae - Punalu'u Preservation Committee
Ka'u High School
Ka'u Historical Society
Ka'u Hospital
Ka'u Lions Club
Ka'u Roping and Riding Club
Kohala Chamber of Commerce
Kona Chamber of Commerce
Life of the Land
Moku Loa Group, Hawaii Chapter
Sierra Club
Naalehu Community Club
Naalehu Elementary School
Native Hawaiian Legal Corporation
Pa'a Pono Milolii
Pahala Community Association
Portuguese Chamber of Commerce
Volcano Community Association

IX. LIST OF EXHIBITS

Figure 1. Island and Regional Location
Figure 2. Ka'u District
Figure 3. Existing Development
Figure 4. Existing Zoning and Regulatory Map
Figure 5. Proposed County General Plan Amendment
Figure 6. Resort Master Plan (July 1987)
Figure 7. Coastal Pond Survey Areas



Island Location Map



Regional Location Map

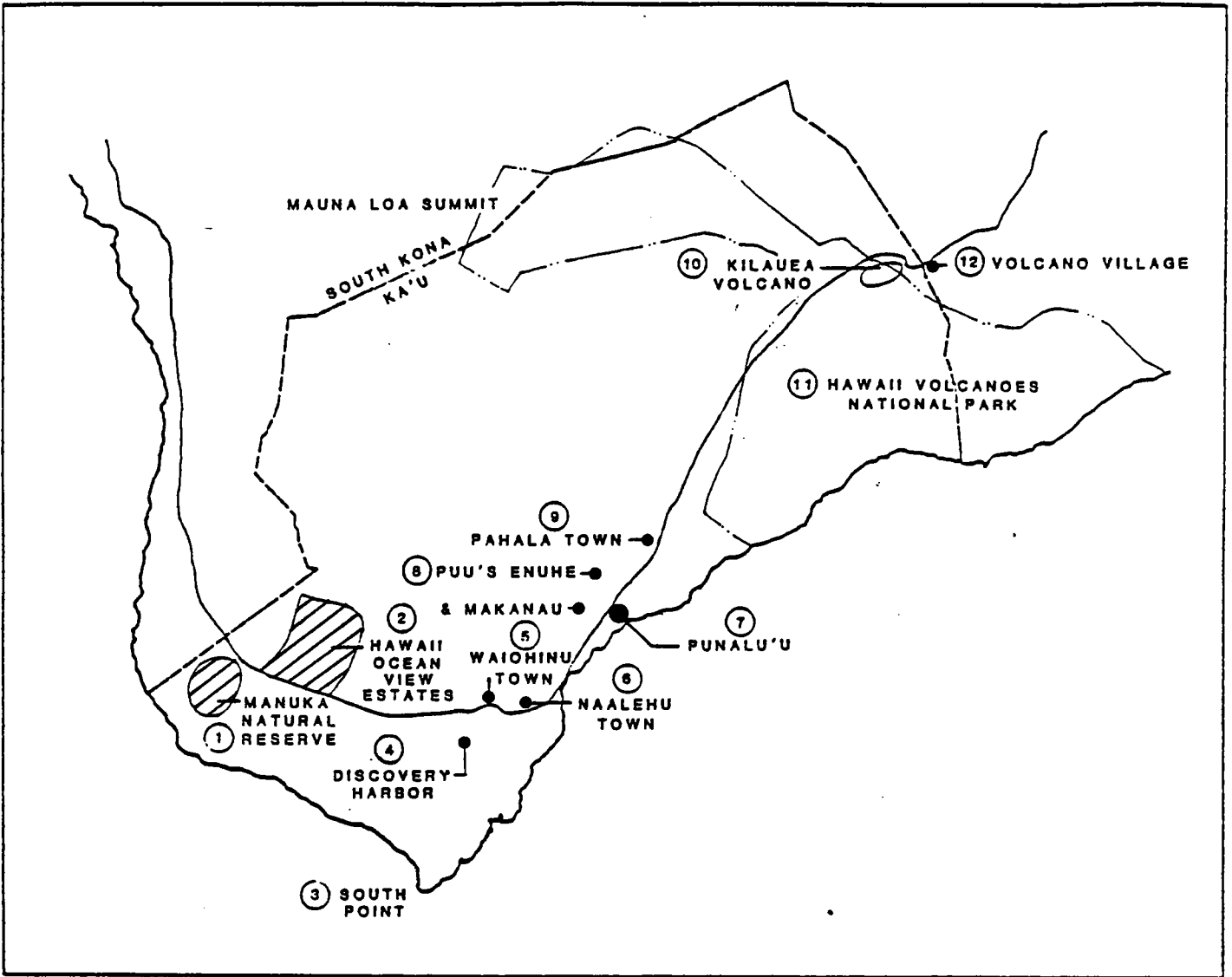
ISLAND AND REGIONAL LOCATION

Punalu'u Resort

KA'U, ISLAND OF HAWAII



FIGURE 1



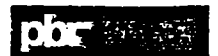
LEGEND

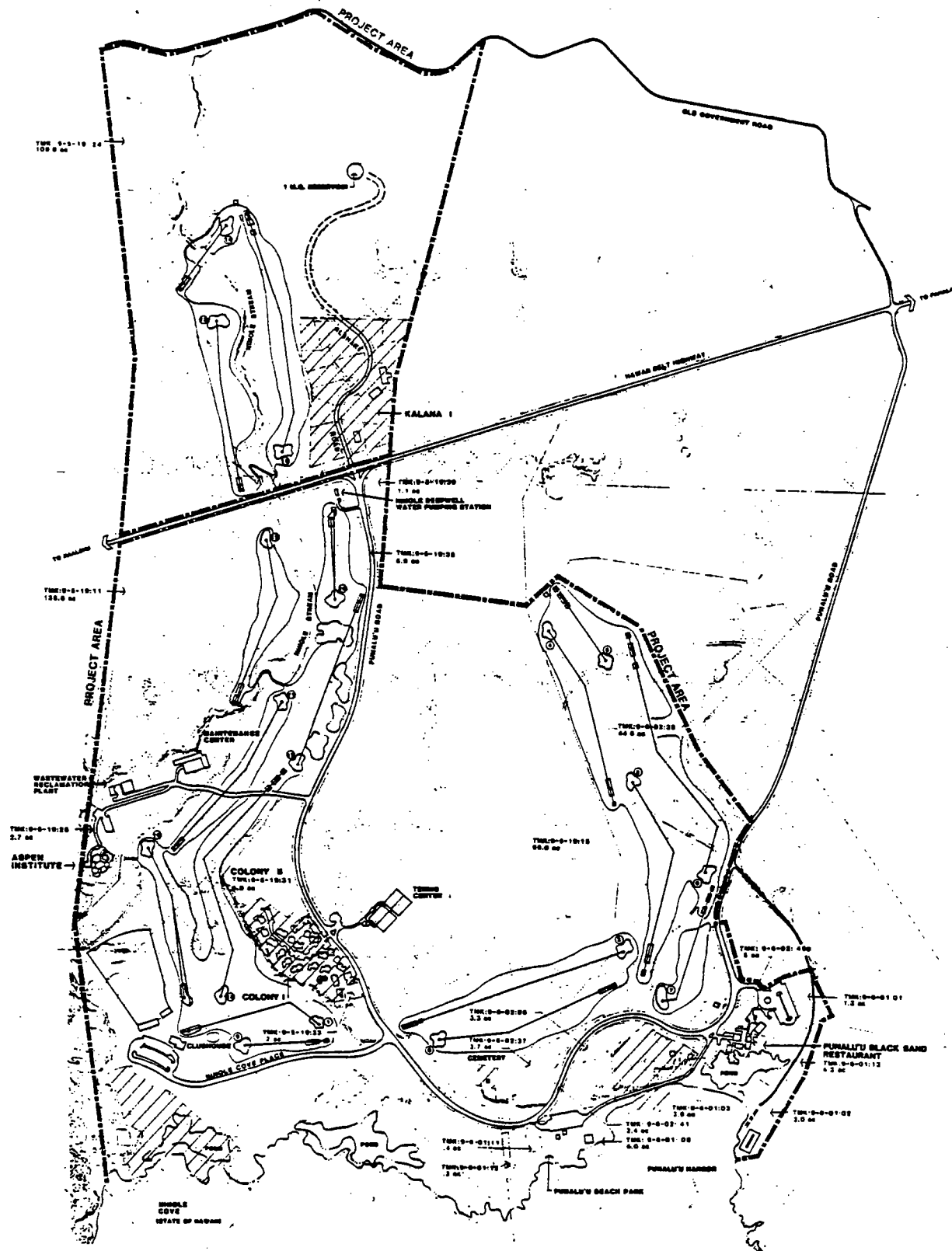
(PLACES OF INTEREST)

- | | |
|-----------------------------|-------------------------------|
| ① MANUKA NATURAL RESERVE | ⑦ PUNALU'U |
| ② HAWAII OCEAN VIEW ESTATES | ⑧ PUU'S ENUHE & MAKANAU |
| ③ SOUTH POINT | ⑨ PAHALA TOWN |
| ④ DISCOVERY HARBOR | ⑩ KILAUEA VOLCANO |
| ⑤ WAIOHINU TOWN | ⑪ HAWAII VOLCANOES NATL. PARK |
| ⑥ NAALEHU TOWN | ⑫ VOLCANO VILLAGE |

KA'U DISTRICT
Punalu'u Resort

KA'U, ISLAND OF HAWAII

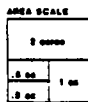




LEGEND
 - - - PROJECT BOUNDARY
 ▨ OTHER OWNERS

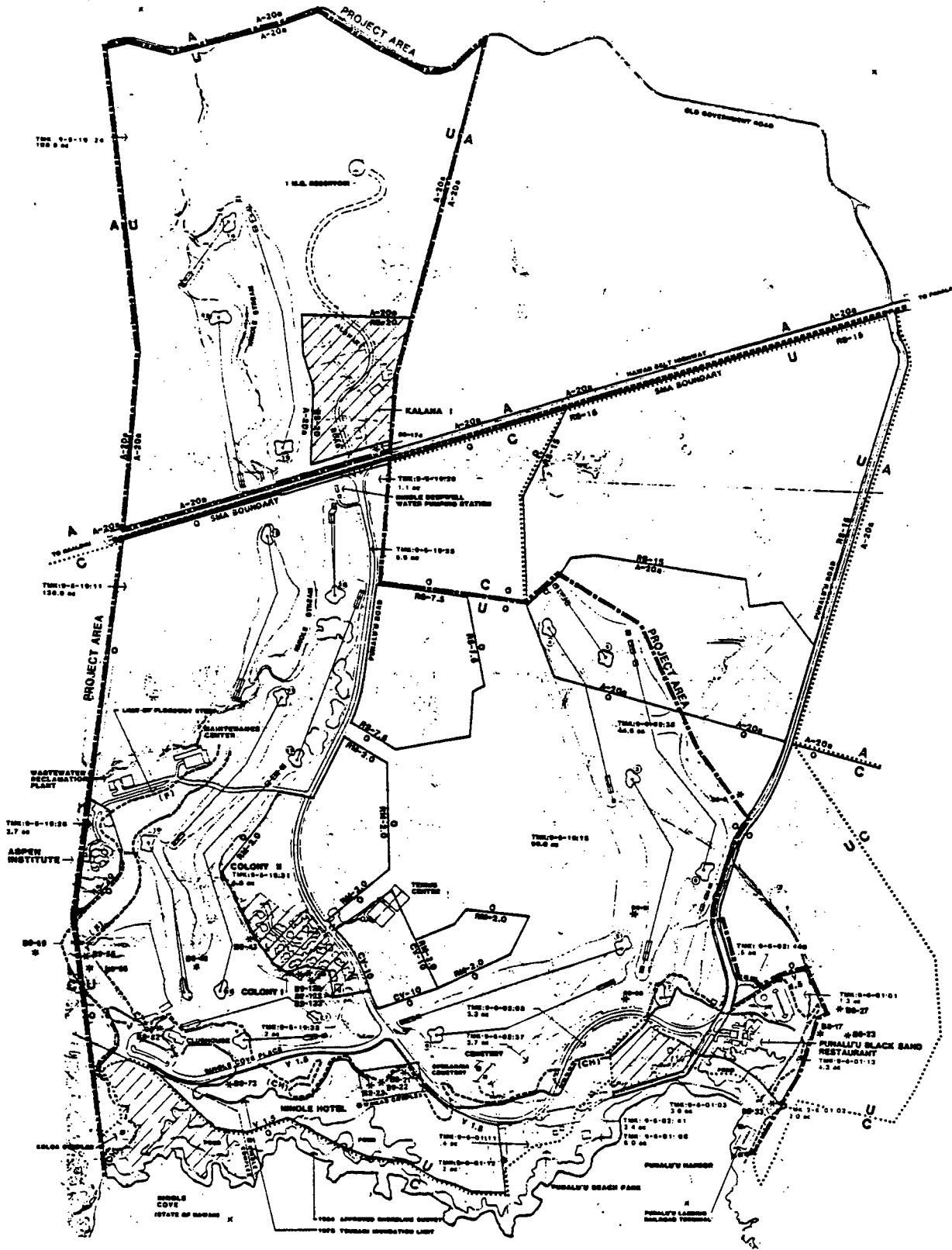
EXISTING DEVELOPMENT Punalu'u Resort

KA'U, ISLAND OF HAWAII



OCT. 1986





LEGEND

- PROJECT BOUNDARY
- OTHER OWNERS

COUNTY ZONING

- VILLAGE COMMERCIAL CV-10
- HOTEL/RESORT V-1.8
- SINGLE FAMILY RB-7.5
- SINGLE FAMILY RB-20
- MULTIPLE-FAMILY RM-2.0
- AGRICULTURE A-200
- OPEN O
- COASTAL ZONE MANAGEMENT**
- SPECIAL MANAGEMENT AREA (SMA)

FLOOD HAZARD

- FLOODWAY (F)
- COASTAL HIGH HAZARD (CH)

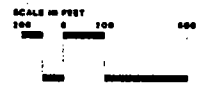
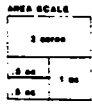
STATE LAND USE (100 AC COURTESY)

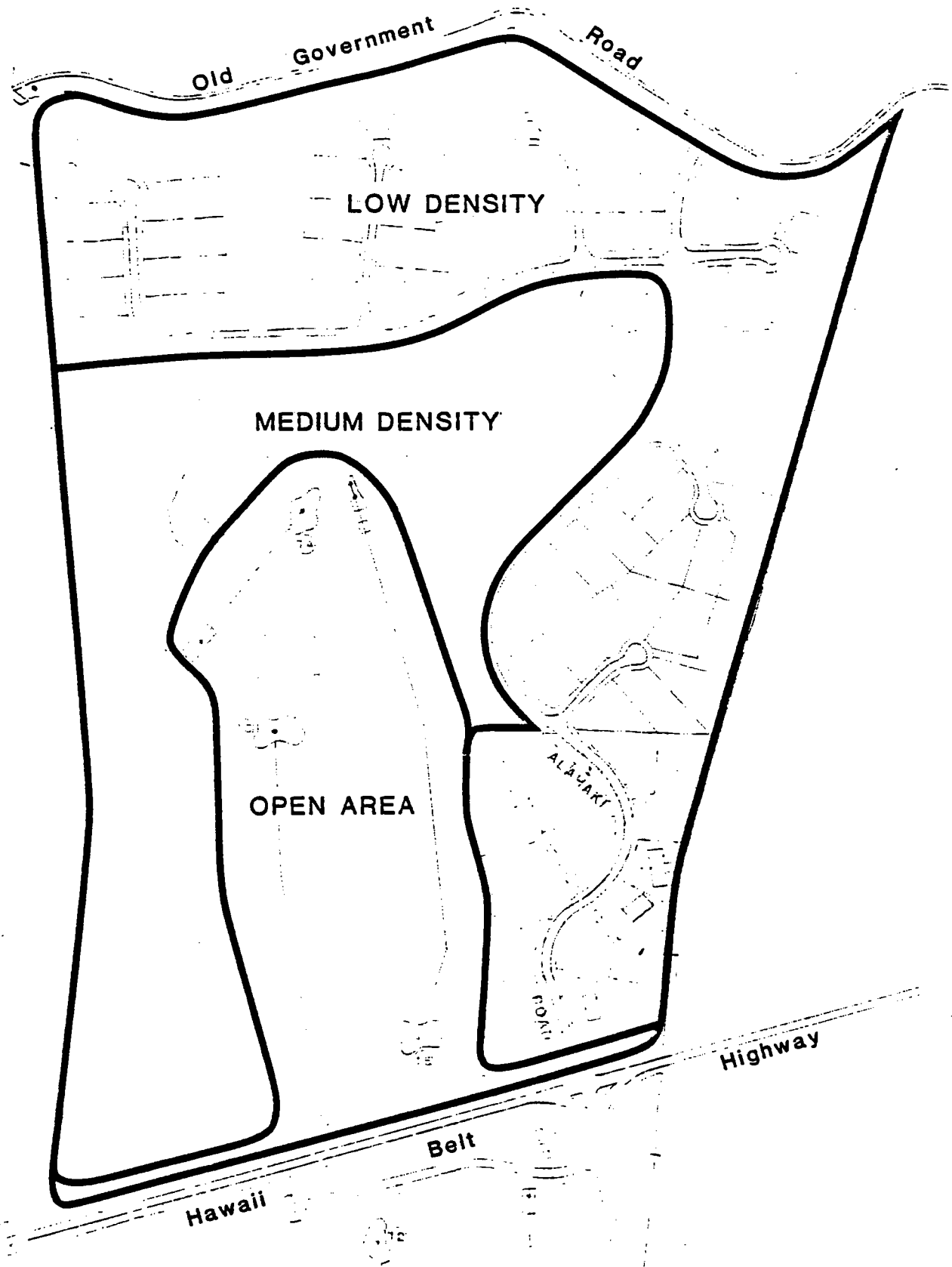
- URBAN U
- CONSERVATION C
- AGRICULTURE A
- ARCHAEOLOGICAL SITES
- REFER TO APPENDIX A

EXISTING COUNTY ZONING AND REGULATORY MAP

Punalu'u Resort

KA'U, ISLAND OF HAWAII





**PROPOSED COUNTY
GENERAL PLAN AMENDMENT**

Punalu'u Resort

KA'U, ISLAND OF HAWAII



RESORT MASTER PLAN Punalu'u

JULY 1987

KA'U, ISLAND OF HAWAII

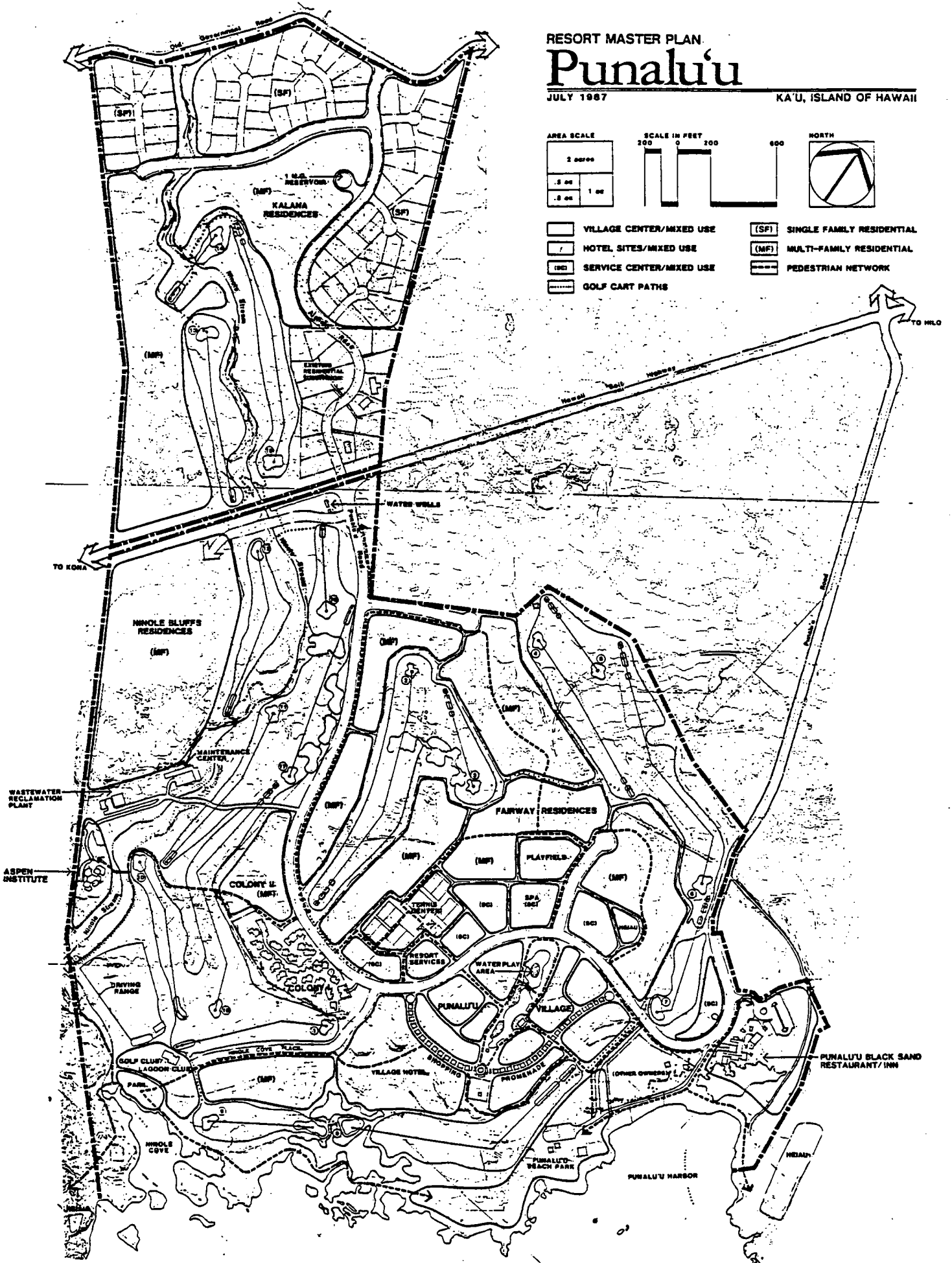
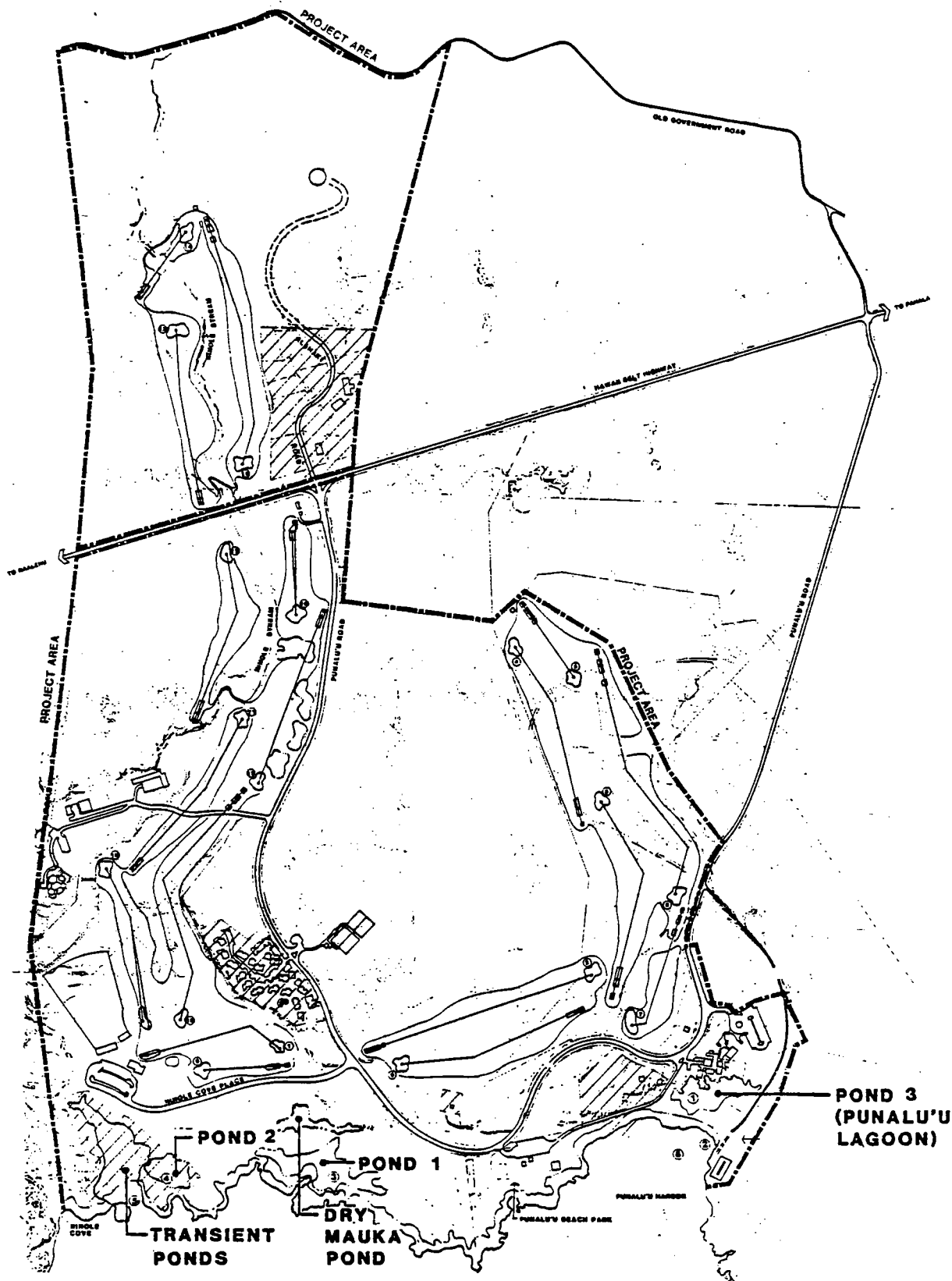


FIGURE 6

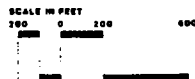
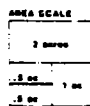


LEGEND

- PROJECT BOUNDARY
- OTHER OWNERS
- WATER QUALITY STATIONS

COASTAL POND SURVEY AREAS Punalu'u Resort

KA'U, ISLAND OF HAWAII





Tom Witten

March 16, 1987

Mr. B.G. Moynahan
C. Brewer Properties, Inc.
745 Fort Street, Suite 1700
Honolulu, Hawaii 96813

Subject: Punaluu Resort

Dear Mr. Moynahan:

I enjoyed meeting you at Punaluu on February 5. I appreciated your willingness to discuss C. Brewer's position with me and for providing OHA with a copy of the Final EIS.

~~Please put the Office of Hawaiian Affairs on your Punaluu Resort mailing list.~~ We look forward to working with you during the upcoming EIS process.

Very truly yours,

Leslie Pyun
Leslie Pyun
Land Agent

LP:nm

TRUSTEES

Moses K. Keele, Sr.
Chairperson
Trustee from Kauai & Nihoa

Louis Heo
Vice Chairperson
Trustee from Molokai & Lanai

Moenikeala Akeke
Trustee from Hawaii

Rod Keelimehiai Bungee
Trustee-at-Large

Clarence F. T. Ching
Trustee from Oahu

A. Frenchy DeSoto
Trustee-at-Large

Manu Keheialii
Trustee from Maui

Thomas K. Kaulukukui, Sr.
Trustee-at-Large

Kevin M. K. "Chubby" Meho
Trustee-at-Large

ADMINISTRATOR

Kamaki A. Kanaha III

1600 Kapiolani Blvd., Suite 1500
Honolulu, Hawaii 96814
(808) 946-2044
264

Phillips Brandt Reddick

October 13, 1987

Ms. Leslie Pyun, Land Agent
Office of Hawaiian Affairs
1600 Kapiolani Blvd., Suite 1500
Honolulu, Hawaii 96814

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Ms. Pyun:

By your letter of March 16, 1987 to Mr. B. G. Moynahan, we have included the Office of Hawaiian Affairs as a consulted party in the preparation of the subject EIS. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBB HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

MAR 18 1987

XI - 21

DANTE K. CARPENTER
MAYOR

HAWAII COUNTY FIRE DEPARTMENT

466 KINODLE STREET HAWAII 96720

PHONE 935-2978



APR 17 1987

FRANCIS E. SMITH
FIRE CHIEF

DON COLOMA
DEPUTY FIRE CHIEF

April 15, 1987

Mr. Thomas S. Witten, ASLA
Principal
Phillips Brandt Reddick
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

The following information is being provided as per your request dated April 1, 1987.

1. Ka'u Fire Station located on Kamani Street, Pahala, Hawaii 96777 (P. O. Box 161). Two 750 gpm triple combination pumpers.
2. There are no future Fire Department facilities planned for the Ka'u District.
3. Future facilities contingent on area development and corresponding population increases.
4. Six-man station with three fire equipment operators and three fire fighters; also, eight volunteers.
5. Seven additional fire fighter/EMS personnel - FY 1988-89.
6. (See No. 5 above)
7. Average number of calls for the last five years - 83 per year.
8. Major fires are classified as brush and structure. Thirty-three (33) over five years.
9. Fire rescue calls are classified as auto accidents, drownings, swimmers in distress, overdue hikers, etc. Forty-nine (49) over five years.

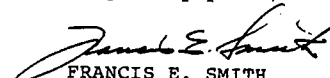
Mr. Thomas S. Witten, ASLA
Page 2
April 15, 1987

10. Number injured over five years - 3
Number killed over five years - 0

11. Dollar value of lost property over five years - \$422,864.00

Recommend automatic sprinkler systems be installed in all structures.

Very truly yours,


FRANCIS E. SMITH
FIRE CHIEF

FES/mo

XI - 22

Phillips Brandt Reddick

October 6, 1987

Mr. Francis E. Smith, Fire Chief
Hawaii County Fire Department
466 Kinoole Street
Hilo, Hawaii 96720


SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Smith:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your concerns as expressed will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

DANTE K. CARPENTER
MAYOR

HAWAII COUNTY FIRE DEPARTMENT

466 KINOOLE STREET, HILO, HAWAII 96720

PHONE 934-2978



FRANCIS E. SMITH
FIRE CHIEF

DON COLOMA
DEPUTY FIRE CHIEF

September 15, 1987

PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Attention: Mr. Thomas S. Witten, ASLA

Gentlemen:

Subject: Punalu'u Resort
Environmental Impact Statement Preparation Notice (EISPN)

No objections to proposed development. Fire protection provided by two-man crew and 750 gpm pumper located in Pahala, and a two-man EMS/Fire crew proposed for Naalehu.

Recommend automatic sprinkler system for all commercial structures. Applicant shall comply with all requirements of the current Uniform Fire Code, Board of Water Supply, and Building Code.

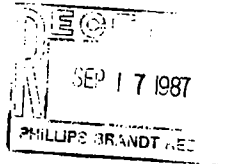
Thank you for giving us the opportunity to submit our comments.

Very truly yours,


FRANCIS E. SMITH
FIRE CHIEF

FES/mo

cc: Planning Department



Phillips Brandt Reddick

October 29, 1987

Mr. Francis E. Smith
Fire Chief
Hawaii County Fire Department
466 Kinoole Street
Hilo, Hawaii 96720

SUBJECT: PUNALU'U RESORT ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

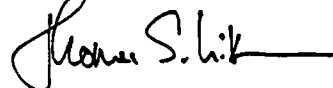
Dear Chief Smith:

Thank you for your letter of September 15, 1987 regarding the subject project. In review of previous data provided by your department (letter April 15, 1987) we note that the information provided is slightly different with regard to the type of equipment and number of men presently assigned to the Ka'u Fire Station (items 1 and 4 of April 15, 1987 letter). Please advise regarding the correct information that should be included in the Draft Environmental Impact Statement.

Thank you for your cooperation in this matter. Please call should you have any questions regarding the above.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

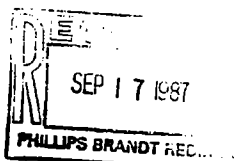
cc: Mr. Albert Lono Lyman, Director
Planning Department

OEQC

JOHN WAIHEE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
DIVISION OF PUBLIC WORKS
P. O. BOX 119, HONOLULU, HAWAII 96810



RUSSEL S. NAGATA
COMPTROLLER

KEN KIYABU
DEPUTY COMPTROLLER

LETTER NO. (P)1774.7

SEP 15 1987

PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Attention: Mr. Thomas S. Witten, ASLA

Gentlemen:

Subject: Punaluu Resort
Environmental Impact Statement
Preparation Notice

We have reviewed the subject document and have no
comments to offer.

Very truly yours,

TEUANE TOMINAGA
State Public Works Engineer

SS:jk
cc: Mr. Albert Lyman

Phillips Brandt Reddick

October 6, 1987

Mr. Teuane Tominaga
Department of Accounting & General Services
Division of Public Works, State of Hawaii
P.O. Box 119
Honolulu, Hawaii 96810

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Tominaga:

Thank you for reviewing the subject EISPN regarding the subject
project. A copy of the Draft EIS will be distributed to you for
review and comment.

Sincerely,

PBR/HAWAII

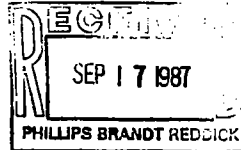
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

JOHN WAIHEE
GOVERNOR



ALEXIS T. LUM
MAJOR GENERAL
ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD, HONOLULU, HAWAII 96816-4495

DEPUTY ADJUTANT GENERAL

September 16, 1987

Phillips Brandt Reddick

October 6, 1987

Major Jerry M. Matsuda
Department of Defense
Office of the Adjutant General
State of Hawaii
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Major Matsuda:

Thank you for reviewing the subject EISPN regarding the subject project. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII
Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

Engineering Office

PBR HAWAII
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

ATTN: Mr. Thomas S. Witten, ASLA

Gentlemen:

Punalu'u Resort
Environmental Impact Statement Preparation Notice (EISPN)

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,

Jerry M. Matsuda
Major, Hawaii Air
National Guard
Contr & Engr Officer

cc: Albert Lyman, Director,
Planning Department,
County of Hawaii

XI - 26



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

25 AUPUNI STREET • HILO, HAWAII 96720

September 16, 1987

PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, HI 96813

ATTENTION: MR. THOMAS S. WITTEN, ASLA

PUNALUU RESORT
EIS PREPARATION NOTICE

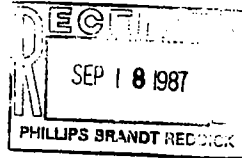
Thank you for the opportunity to comment on the subject document.

The area is served by a privately owned and maintained water system. The document should address the adequacy of the existing water system facilities relative to current and future water demands.

William Sewake
H. William Sewake
Manager

QA

cc - Planning Department



Phillips Brandt Reddick

October 6, 1987

Mr. H. William Sewake, Manager
Department of Water Supply
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Sewake:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your concerns as expressed will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

XI - 27

... Water brings progress...

JOHN WAIHEE
GOVERNOR



EMPLOYEES' RETIREMENT SYSTEM
HAWAII PUBLIC EMPLOYEES HEALTH FUND
OFFICE OF THE PUBLIC DEFENDER
PUBLIC UTILITIES COMMISSION

STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE
STATE CAPITOL
P.O. BOX 150
HONOLULU, HAWAII 96810-0150

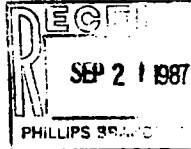
September 16, 1987

YUKIO TAKEMOTO
DIRECTOR

ROBERT P. TAKUSHI
DEPUTY DIRECTOR

Thomas I. Yamashiro
Deputy Director

DIVISIONS:
BUDGET, PLANNING AND MANAGEMENT
ELECTRONIC DATA PROCESSING
FINANCE
Telecommunications



Mr. Thomas S. Witten, ASLA
Principal
Phillips Brandt Reddick-Hawaii
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

This is in response to your letter of September 11, 1987 regarding the Draft Environmental Impact Statement Preparation Notice by C. Brewer Properties, Inc., for the Punalu'u Resort located in the Ka'u District on the island of Hawaii.

Thank you for the opportunity to comment on the proposal; however, we have no comments to make at this time.

Sincerely,

YUKIO TAKEMOTO

Phillips Brandt Reddick

October 6, 1987

Mr. Yukio Takemoto, Director
Department of Budget and Finance
State of Hawaii
P. O. Box 150
Honolulu, Hawaii 96810-0150

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Takemoto:

Thank you for reviewing the subject EISPN regarding the subject project. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR/HAWAII

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

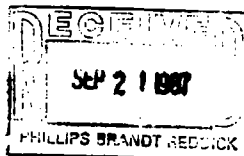
Dante K. Carpenter
Mayor
RONALD IBARRA
Managing Director



DEPARTMENT OF PARKS & RECREATION
COUNTY OF HAWAII

Patricia G. Engelhard
Director

Ronald Okamura
Deputy Director



September 17, 1987

Mr. Thomas Witten, ASLA
Phillips, Brandt, Reddick
130 Merchant Street, Suite 1111
Honolulu, HI 96813

Subject: Punaluu Resorts - Revised Master Plan
EIS Preparation Notice

Dear Mr. Witten:

We do not foresee any adverse impact on Punaluu Beach
Park resulting from the revised resort master plan.

Thank you for the opportunity to review the EIS
Preparation Notice.

Sincerely,

Pat Engelhard
Patricia Engelhard
Director

PE:GM:ai

cc: A. Lyman, Planning Director

Phillips Brandt Reddick

October 6, 1987

Ms. Patricia Engelhard, Director
Department of Parks and Recreation
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Ms. Engelhard:

Thank you for reviewing the subject EISPN and providing comments
regarding the subject project. Your comments will be included in
the Draft EIS of which a copy will be distributed to you for
review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

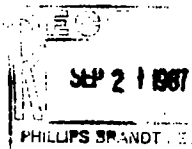
cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control



POLICE DEPARTMENT

COUNTY OF HAWAII
349 KAPIOLANI STREET
HILO, HAWAII 96720



GUY A. PAUL
CHIEF OF POLICE
WAYNE G. CARVALHO
DEPUTY CHIEF

OUR REFERENCE

YOUR REFERENCE

September 17, 1987

Mr. Thomas S. Witten, ASLA
Principal, Phillips brandt Reddick
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

RE: Punalu'u Resort
Environmental Impact Statement Preparation Notice
(EISPN)

The above application has been reviewed and from the
police standpoint, we foresee no adverse effect from the
requested land use.

GUY A. PAUL
CHIEF OF POLICE

Wayne G. Carvalho
WAYNE G. CARVALHO
DEPUTY CHIEF OF POLICE

cc: Ka'u Police

Phillips Brandt Reddick

October 6, 1987

Mr. Wayne G. Carvalho
Deputy Chief of Police
Police Department, County of Hawaii
349 Kapiolani Street
Hilo, Hawaii 96720

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Carvalho:

Thank you for reviewing the subject EISPN and providing comments
regarding the subject project. Your comments will be included in
the Draft EIS of which a copy will be distributed to you for
review and comment.

Sincerely,

PER HAWAII
Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

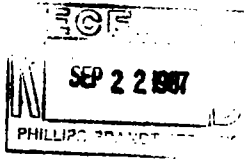
XI
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30

JAMES L. K. DAHLBERG
Councilman



COUNTY COUNCIL

County of Hawaii
Hawaii County Building
25 Aupuni Street
Hilo, Hawaii 96720



September 16, 1987

Mr. Thomas S. Witten, ASLA, Principal
Phillips Brandt Reddick
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, HI 96813

Dear Mr. Witten:

Thank you for your letter transmitting for review and comment
the Punalu'u Resort EIS Preparation Notice.

The comments by the Hawaii County Council members will be
compiled and sent to you as requested.

As the Council representative from the district of Ka'u, I am
vitally interested in the project and would appreciate your
keeping me abreast of all aspects.

Sincerely,


James L. K. Dahlberg
COUNCILMAN

Phillips Brandt Reddick

October 6, 1987

The Honorable Councilman James L. K. Dahlberg
Hawaii County Council
25 Aupuni Street
Hilo, Hawaii 96720

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Honorable Councilman Dahlberg:


Thank you for reviewing the subject EISPN and coordinating the
Hawaii County Council comments regarding the subject project.
Your comments will be included in the Draft EIS of which a copy
will be distributed to you for review and comment.

Upon completion of the Draft EIS, we will be requesting a
workshop with the Council in order to brief the members on the
status of the proposal and to receive further comments or answer
questions.

Thank you for your interest in this important project for the
Ka'u district.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

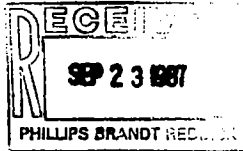
Office of Environmental Quality Control

IX - 18

Native Hawaiian Legal Corporation

1164 BISHOP STREET, SUITE 900, HONOLULU, HAWAII 96813 TELEPHONE (808) 521-2302

September 22, 1987



Mr. Thomas S. Whitten
PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Re: EIS for Punaluu Resort

Dear Mr. Whitten:

Pursuant to your letter dated September 11, 1987 and the attached preparation notice for the Punaluu Resort Draft Environmental Impact Statement, please include my clients, the Punaluu Cultural Committee of Ka Ohana O Kalae, as a consulted party to the preparation of the EIS for the proposed Punaluu Resort. Please send two copies of the draft EIS to the Committee in care of my office.

Should you have any questions on this matter, please feel free to call me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Livia Wang".

Livia Wang
Staff Attorney

LW/11

cc: Mr. Albert Lono Lyman,
Planning Director
Mrs. Pele Hanoa

Phillips Brandt Reddick

October 6, 1987

Mr. Livia Wang, Staff Attorney
Native Hawaiian Legal Corporation
1164 Bishop Street, Suite 900
Honolulu, Hawaii 96813

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Wang:

Thank you for reviewing the subject EISPN. Your clients, the Punalu'u Cultural Committee of Ka Ohana O Kalae, will be included as a consulted party to the preparation of the EIS. Two copies of the Draft EIS will be distributed to your clients in care of your office for review and comment.

Sincerely,

PBR HAWAII

A handwritten signature in black ink, appearing to read "Thomas S. Witten".

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

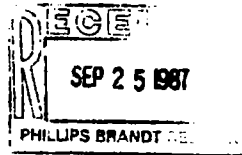
Office of Environmental Quality Control



HAWAII REDEVELOPMENT AGENCY

COUNTY OF HAWAII
35 WAILUKU DRIVE • HILO, HAWAII 96720 • PHONE (808) 935-9923

September 23, 1987



PBR HAWAII
130 Merchant Street
Suite 1111
Honolulu, HI 96813

ATTN: MR. THOMAS S. WITTEN

Dear Mr. Witten:

RE: EISPN: PUNALU'U RESORT

The Hawaii Redevelopment Agency reviewed the Environmental Impact Statement Preparation Notice for the Punalu'u Resort at its September 21, 1987 monthly public meeting.

The Commissioners had no comments or objections pertaining to the document.

Thank you for the opportunity to review the EISPN.

Very truly yours,

Gordon H. Nobriga
Manager
HAWAII REDEVELOPMENT AGENCY

GHN/us

cc: Mr. A. Lono Lyman
Planning Director
County of Hawaii

Phillips Brandt Reddick

October 6, 1987

Mr. Gordon H. Nobriga, Manager
Hawaii Redevelopment Agency
County of Hawaii
35 Wailuku Drive
Hilo, Hawaii 96720

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Nobriga:

Thank you for reviewing the subject EISPN. When completed, the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

XI - 33

JOHN WAIHEE
GOVERNOR



SEP 28 1987
RUSSELL N. FUKUMOTO
Acting Executive Director

STATE OF HAWAII
Department of Business and Economic Development
Housing Finance and Development Corporation
P. O. BOX 17907
HONOLULU, HAWAII 96817

IN REPLY REFER

TO:

87:PLNG/4143JT

September 23, 1987

PBR HAWAII
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Attention: Mr. Thomas S. Witten, ASLA

Dear Mr. Witten:

Re: Environmental Impact Statement Preparation Notice
for the Punalu'u Resort

Effective July 1, 1987, the Hawaii Housing Authority's housing finance, housing development and residential leasehold and relocation programs were transferred to the newly created Housing Finance and Development Corporation (HFDC), which is administratively attached to the Department of Business and Economic Development. Since the proposed project is development related, the HFDC has elected to comment on the proposed project on behalf of the Authority.

The environmental impact statement (EIS) should address the projected housing demand generated by the project. Furthermore, a description of the developer's plans to provide for employee housing (including number and location of units, and development timetable).

Thank you for the opportunity to provide comments. Please keep us informed about this project.

Sincerely,

Russell N. Fukumoto
RUSSELL N. FUKUMOTO
Acting Executive Director

cc: Mr. Albert L. Lyman, Director
Planning Dept., County of Hawaii

Phillips Brandt Reddick

October 6, 1987

Mr. Russell N. Fukumoto
Department of Business and Economic Development
Housing Finance and Development Corporation
State of Hawaii
P. O. Box 17907
Honolulu, Hawaii 96817

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Fukumoto:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your concerns as expressed will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

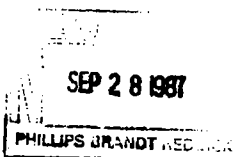
Office of Environmental Quality Control

XI
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34

HAWAII CONFERENCE FOUNDATION

Telephone 537-9516 • 15 Craigside Place • Honolulu, Hawaii 96817

24 September 1987



Mr. Thomas S. Witten, ASLA
PBR - Hawaii
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, HI 96813

Dear Mr. Witten:

The Hawaii Conference Foundation would like to be a consulted party in the matter of the Punaluu Resort at Kau, Hawaii.

May we please receive a copy of the Draft Environmental Impact Statement when it becomes available as you said in early November? We shall make appropriate comments after reviewing the document.

Thank you for your help.

Very truly yours,


James A. Richards
Executive Secretary

JAR:dt

cc: Albert L. Lyman, Director
Planning Department
County of Hawaii

Phillips Brandt Reddick

October 6, 1987

Mr. James A. Richards
Executive Secretary
Hawaii Conference Foundation
15 Craigside Place
Honolulu, Hawaii 96817

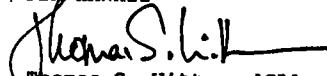
SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Richards:

Thank you for reviewing the subject EISPN regarding the subject project. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

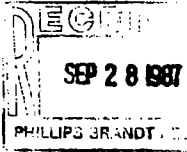


United States Department of the Interior

GEOLOGICAL SURVEY

Water Resources Division
P.O. Box 50166
Honolulu, Hawaii 96850

September 25, 1987



Phillips Brandt Reddick

October 6, 1987

Mr. Thomas S. Witten, ASLA
PBR Hawaii
130 Merchant Street, Suite 111
Honolulu, Hawaii 96813

Subject: Punalu'u Resort EIS Preparation Notice (EIS PN)

Dear Mr. Witten:

We have reviewed the subject EISPN. Principal reviewer was Kiyoshi J. Takasaki. We have no major comments at this time. We would, however, like to point out that the water levels in your wells are less than 150 feet from the land surface. Because of this shallow water level, any pollutant that is introduced at the land surface upgradient of the well is likely to find its way to the underlying ground-water.

We would suggest an increase in your monitoring effort if there is a significant change in development upgradient of your wells.

Sincerely,

William Meyer
William Meyer
District Chief

Mr. William Meyer, District Chief
U. S. Department of the Interior
Geological Survey
Water Resources Division
P.O. Box 50166
Honolulu, Hawaii 96850

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Meyer:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your concerns as expressed will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII
Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

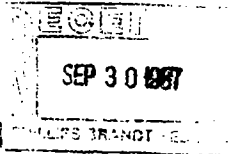
XI - 36

JOHN WAIHEE
GOVERNOR

CHARLES T. TOGUCHI
SUPERINTENDENT



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 2360
HONOLULU, HAWAII 96804



September 24, 1987

Phillips Brandt Reddick

October 6, 1987

Mr. Charles T. Toguchi, Superintendent
Department of Education
State of Hawaii
P. O. Box 2360
Honolulu, Hawaii 96804

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Toguchi:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. A construction timetable will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR/HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

OFFICE OF THE SUPERINTENDENT

P.B.R. Hawaii
130 Merchant Street - Suite 1111
Honolulu, Hawaii 96813

Attention: Mr. Thomas S. Witten, ASLA

Gentlemen:

Subject: Punaluu Resort
Environmental Impact Statement
Preparation Notice (EISPN)

Our review of your proposed development indicates that it may generate the following enrollment impact:

SCHOOL	GRADE	APPROXIMATE ENROLLMENT
Ka'u High & Pahala El.	K-12	90 - 170

Ka'u High and Pahala Elementary School is operating at near capacity. Additional classrooms will need to be budgeted to meet the enrollment growth.

We would appreciate receiving from your office a construction timetable so that we can provide the needed facilities on a timely basis.

Sincerely,

Charles T. Toguchi

CHARLES T. TOGUCHI
Superintendent

CTT:th

cc OBS
Hawaii District

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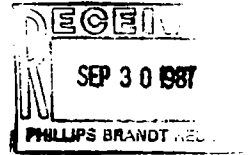


DANTE K. CARPENTER, MAYOR
DENNIS M. YAMAMOTO
Director

DEPARTMENT OF RESEARCH AND DEVELOPMENT

COUNTY OF HAWAII • 34 RAINBOW DRIVE • HILO, HAWAII 96720 • TELEPHONE (808) 961-8366

September 21, 1987



PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, HI 96813

Attention: Mr. Thomas S. Witten, ASLA

Dear Mr. Witten:

We are in receipt of C. Brewer Properties, Inc. Preparation Notice for the Punalu'u Resort Draft Environmental Impact Statement. We have been monitoring the progress of the development and are interested in the various impacts the project may have on the area.

We would appreciate a copy of the EIS when it becomes available.

Sincerely yours,

IX
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Dennis M. Yamamoto
Dennis M. Yamamoto
Director

cc: Mr. Albert Lyman, Planning Director

Phillips Brandt Reddick

October 6, 1987

Mr. Dennis Yamamoto, Director
Department of Research and Development
County of Hawaii
34 Rainbow Drive
Hilo, Hawaii 96720

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Yamamoto:

Thank you for reviewing the subject EISPN regarding the subject project. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII
Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
BUILDING 230
FT. SHAFTER, HAWAII 96858-5440

September 29, 1987



-2-

Copy Furnished:

Director
Planning Department
County of Hawaii
25 Aupuni Street
Hilo, HI 96720

Mr. Thomas S. Witten, ASLA
PBR - HAWAII
130 Merchant Street
Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Punalu'u Resort, Ka'u, island of Hawaii. The following comments are offered:

a. A Department of the Army permit may be required for work in the ponds at Punalu'u. You are advised to contact Operations Branch (telephone 438-9258).

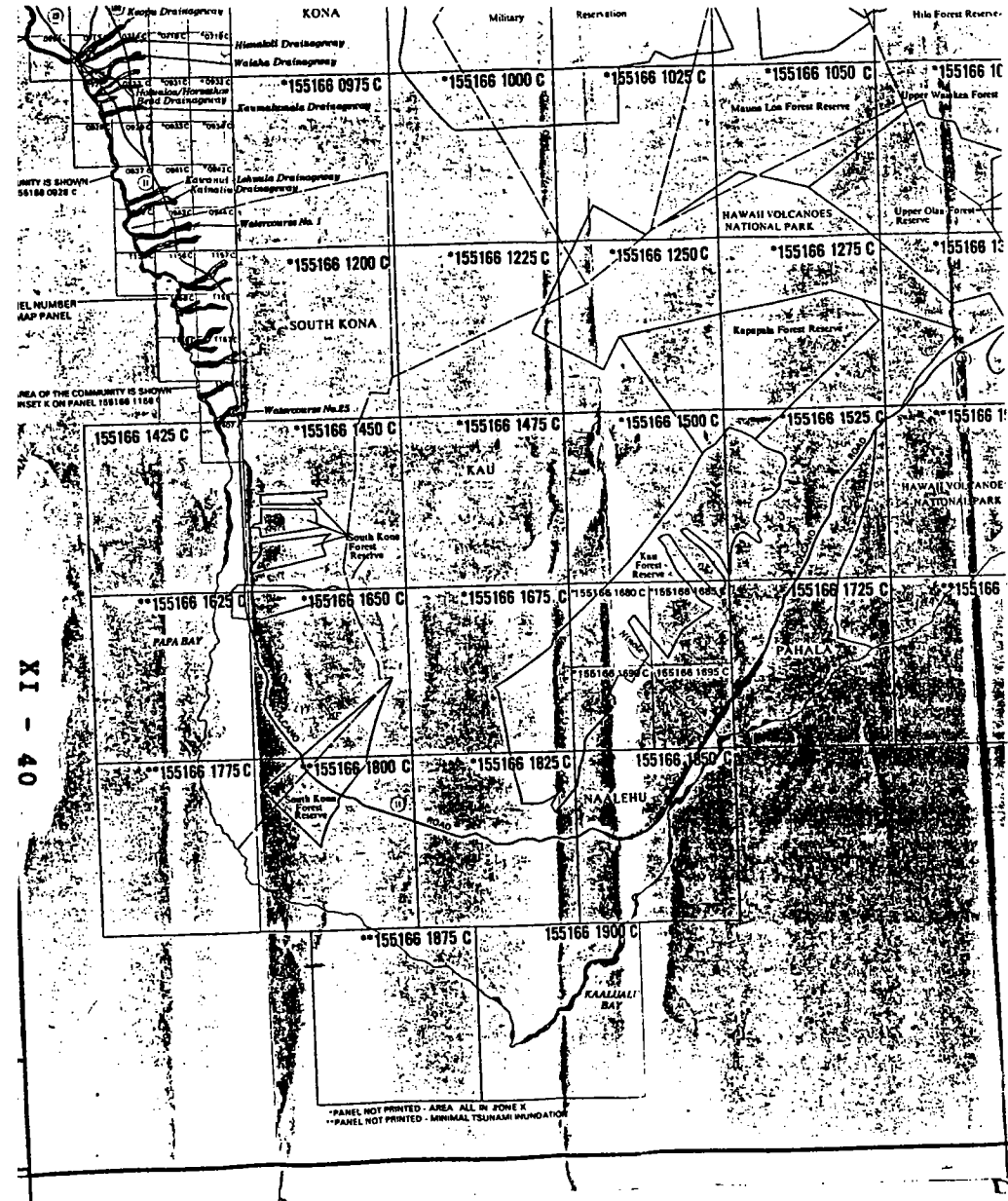
b. The parcels for the Punalu'u Resort area are shown on the enclosed tax maps for Punaluu/Paauau/Kau. According to the Flood Insurance Rate Maps (FIRMs) prepared by the Federal Emergency Management Agency (FEMA), the parcels are located in a designated Zone X (unshaded). Zone X is outside of the 500-year flood. This does not necessarily mean that the parcels lie outside of a flood area. Because each County (Land Utilization or Public Works Departments) administers its own flood hazard prevention ordinances, you are advised to coordinate with the County of Hawaii regarding all Zone X designations for this project.

Sincerely,

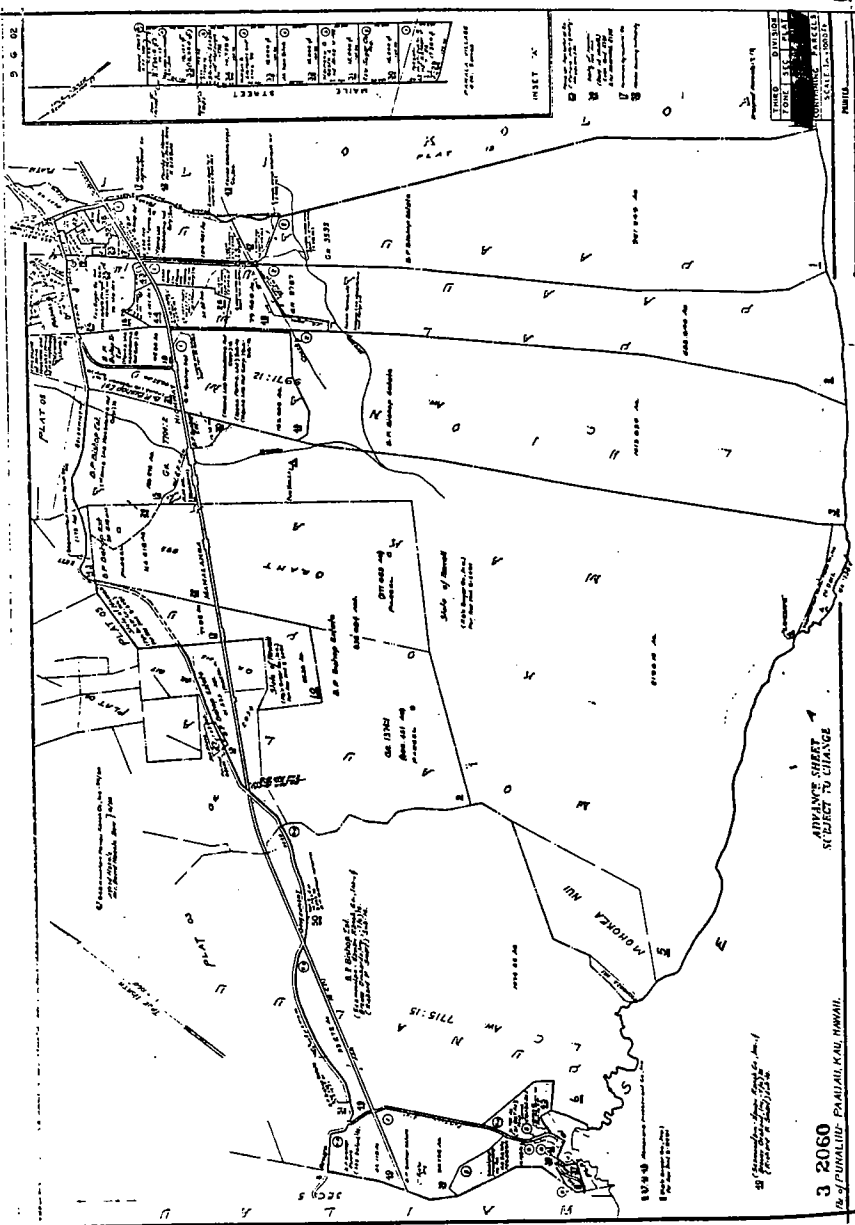
James S. Nakasone
Clarence Fujii *for*
Acting Chief, Engineering
Division

Enclosures

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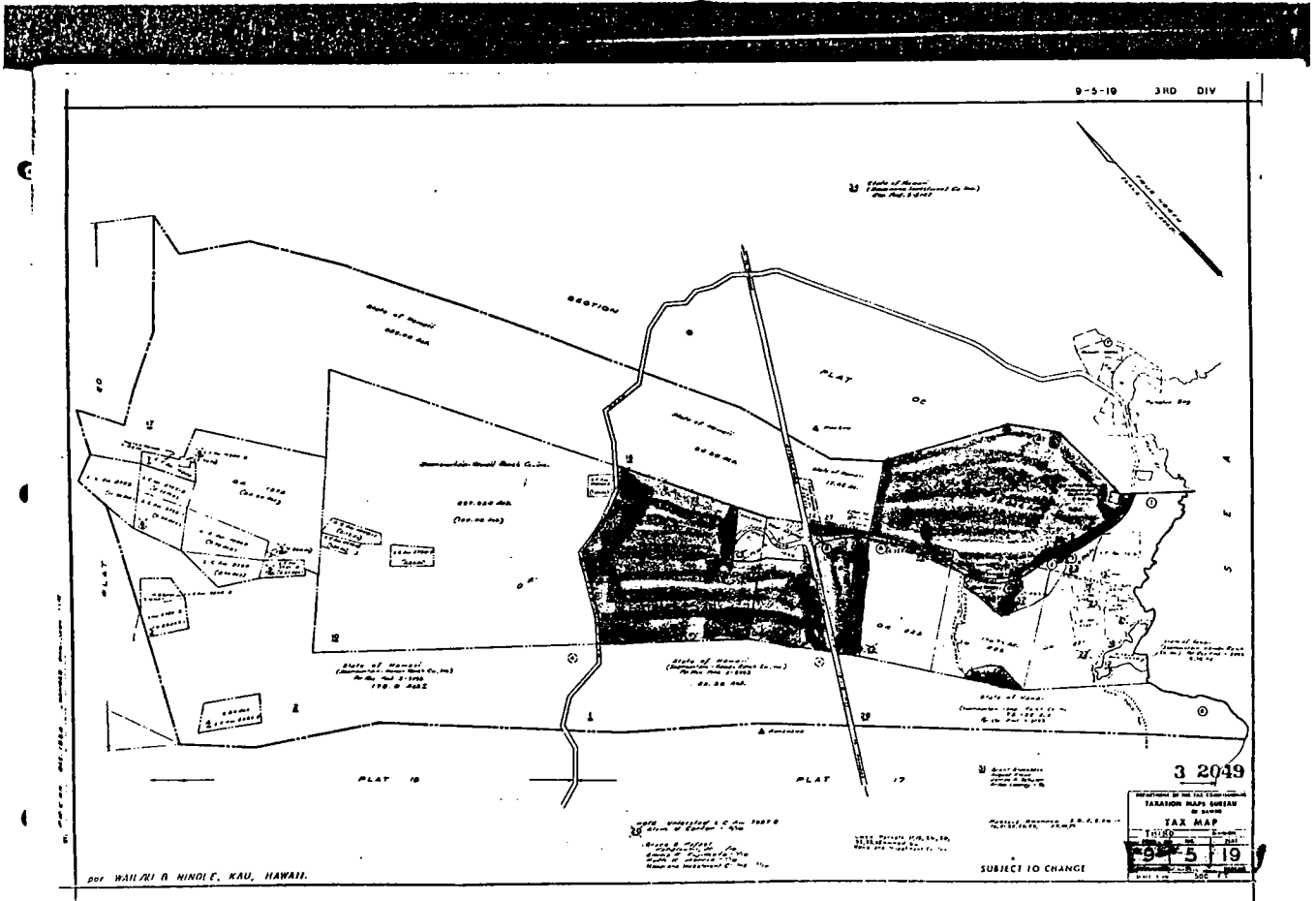
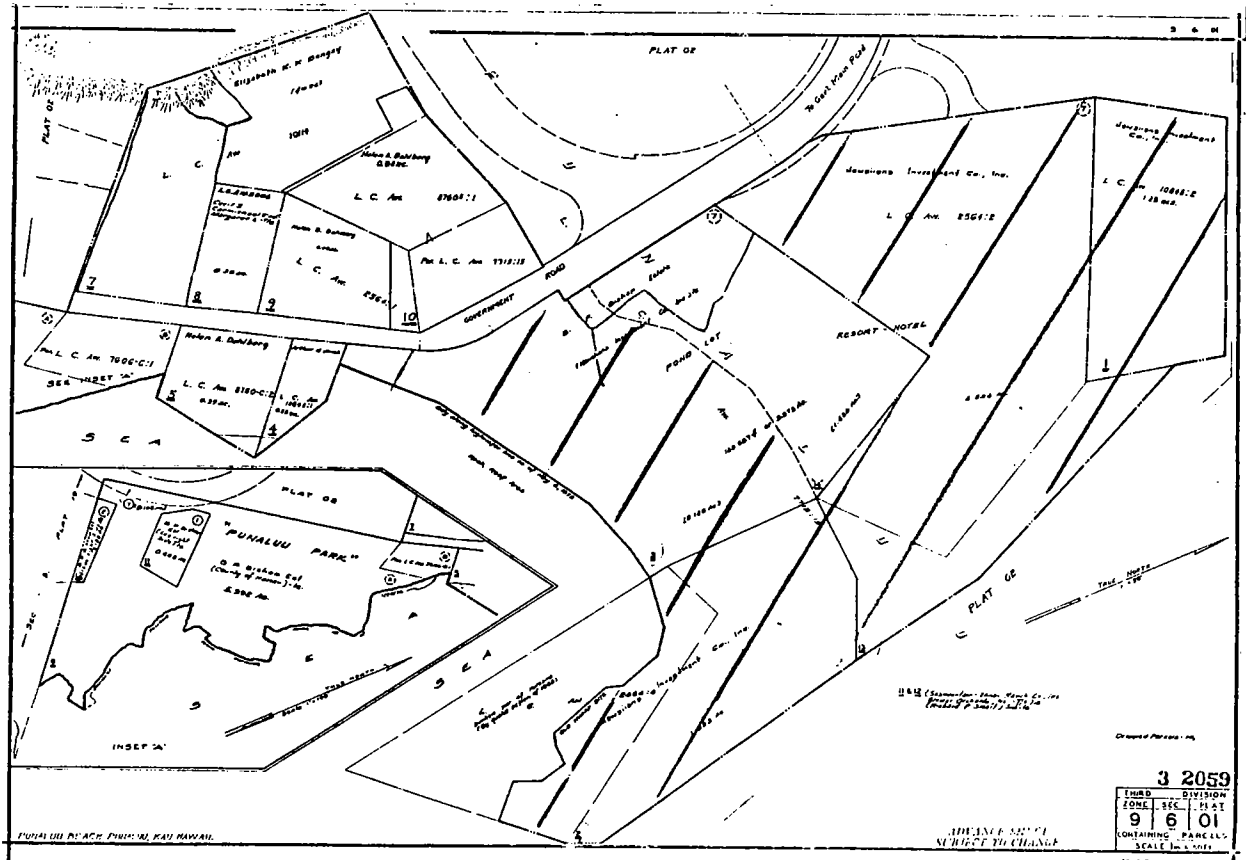
*PANEL NOT PRINTED - AREA ALL IN ZONE K
 **PANEL NOT PRINTED - MINIMAL TSUNAMI WINDUATOR



3 2060
 No. of PANELS: PANJIAN, KAU, HAWAII

ADVANCE SHEET
 SUBJECT TO CHANGE

XI - 40



Phillips Brandt Reddick

October 13, 1987

Mr. Clarence Fujii, Acting Chief
Engineering Division
Department of the Army
U. S. Army Engineers District, Honolulu
Building 230
Fort Shafter, Hawaii 96858-5440

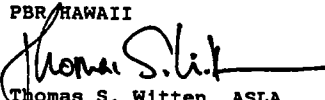
SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Fujii:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR/HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

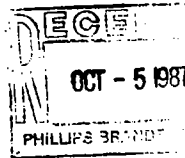
Office of Environmental Quality Control

Speaker
RICHARD A. KAWAKAMI
Vice Speaker
EMILIO S. ALCON
Majority Leader
TOM OKAMURA
Majority Floor Leader
PETER K. APO

HOUSE OF REPRESENTATIVES
THE FOURTEENTH LEGISLATURE

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

September 30, 1987



DISTRICT REPRESENTATIVES

1st — ANDREW LEVIN
2nd — HARVEY S. TAJRI
3rd — WAYNE METCALF
4th — DWIGHT Y. TAKAMINE
5th — VIRGINIA ISBELL
6th — MIKE O'KIEFFE
7th — MARK J. ANDREWS
8th — HERBERT J. HONDA
9th — JOSEPH M. SOUKI
10th — BILL PFEIL
11th — DANIEL J. KIHANO
12th — SAMUEL S. H. LEE
13th — ROBERT BUNDA
14th — JOSEPH P. LEONG
15th — REB BELLINGER
16th — TERRANCE W. H. TOM
17th — MARSHALL K. IGE
18th — WHITNEY T. ANDERSON**
19th — JOHN JUSTIN MEDEIROS
20th — CAM CAVASSO
21st — PATRICK A. RIBELLIA
22nd — HAL JONES
23rd — BARBARA MARUMOTO
24th — FRED HEMMING, JR.
25th — CALVIN K.Y. SAY
26th — LES IHARA, JR.
27th — BRIAN T. TANIGUCHI
28th — JAMES T. SHON
29th — DAVID M. HAGINO
30th — JOAN HAYES
31st — CAROL FUKUNAGA
32nd — MAZIE HIRONO
33rd — ROD TAM
34th — MIKE LIU†
35th — KENNETH T. HIRAKI
36th — DWIGHT L. YOSHIMURA
37th — DENNIS A. ARAKAKI
38th — EMILIO S. ALCON
39th — ROMY M. CACHOLA
40th — KAREN K. HORITA
41st — TOM OKAMURA
42nd — CLARICE Y. HASHIMOTO
43rd — DAVID Y. IGE
44th — ELOISE YAMASHITA TUNGPALAN
45th — MITSUO "MITS" SHITO
46th — PAUL T. OSHIRO
47th — MIKE CROZIER
48th — HENRY HAALILIO PETERS
49th — PETER K. APO
50th — EZRA R. KANOHO
51st — RICHARD A. KAWAKAMI

Thomas S. Witten, ASLA
Principal
Phillips Brandt Reddick
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

I acknowledge receipt of the Preparation Notice for the Punalu'u Resort Draft Environmental Impact Statement.

I have no comments to offer on the EISPN at this time, however, I will contact you if some comments or concerns should arise in the future.

With warm personal regards.

Sincerely,

WAYNE METCALF
Hawaii State Representative
Third District

Phillips Brandt Reddick

October 13, 1987

The Honorable Representative Wayne Metcalf
Hawaii State Representative, Third District
State Capitol, Room 327
Honolulu, Hawaii 96813

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Honorable Representative Metcalf:

Thank you for reviewing the subject EISPN. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PER HAWAII

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

†Minority Leader
**Minority Floor Leader

JOHN WAIHEE
GOVERNOR



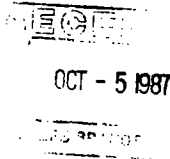
SUZANNE D. PETERSON
CHAIRPERSON, BOARD OF AGRICULTURE

TADASHI TOJO
DEPUTY TO THE CHAIRPERSON

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

Mailing Address:
P. O. Box 22159
Honolulu, Hawaii 96822-0159

September 29, 1987



Phillips Brandt Reddick

October 13, 1987

Ms. Suzanne D. Peterson, Chairperson
Board of Agriculture
Department of Agriculture
State of Hawaii
Honolulu, Hawaii 96814-2512

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Ms. Peterson:

Thank you for reviewing the subject EISPN and acknowledging that the previous EIS adequately addressed your concerns and that the Department of Agriculture has no further comments to offer.

Sincerely,

PBF HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

Landscape Architecture • Planning • Environmental Studies
Honolulu • Irvine • San Francisco • Denver
Financial Plaza of the Pacific • 130 Merchant Street, Suite 1111 • Honolulu, Hawaii 96813 • Tel. (808) 521-5631

Mr. Thomas S. Witten, ASLA
Phillips Brandt Reddick - Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Subject: Environmental Impact Statement Preparation Notice
(EISPN) for Punaluu Resort
C. Brewer Properties, Inc.
Punaluu, Ka'u, Hawaii
TMK: 9-5-19: 11, 15, 24, 26, 30, 31, 33 and 35
9-6-01: 01, 02, 03, 06, 11, 12 and 13
9-6-02: 08, 37, 38, 41 and 45
Acres: 433

Dear Mr. Witten:

The Department of Agriculture has reviewed the subject EISPN for the revised Punaluu Resort Master Plan and has no further comments to offer. We had previously reviewed the Draft EIS for Mr. A. Lono Lyman, Director, Planning Department, County of Hawaii on November 28, 1986, and found our concerns to be adequately addressed.

Sincerely,

Suzanne D. Peterson

SUZANNE D. PETERSON
Chairperson, Board of Agriculture

cc: OEQC
Hawaii County Planning Department

XI - 44

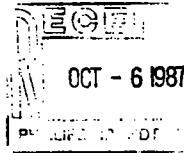
JOHN WAIHEE
GOVERNOR



EXECUTIVE CHAMBERS
HONOLULU

JOSHUA C. AGSALUD
ADMINISTRATIVE DIRECTOR

October 2, 1987



Mr. Thomas S. Witten, ASLA
Phillips Brandt Reddick
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Thank you for your letter of September 11, 1987, regarding the environmental impact statement preparation notice for the proposed Punalu'u Resort at Punalu'u, Ka'u, Hawaii. We have shared your letter with the appropriate state agencies.

Sincerely,

JOSHUA C. AGSALUD

Phillips Brandt Reddick

October 13, 1987

Mr. Joshua C. Agsalud
Administrative Director
Office of the Governor
State of Hawaii
Honolulu, Hawaii 96832

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Agsalud:

Thank you for reviewing the subject EISPN and sharing it with appropriate state agencies. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii
Office of Environmental Quality Control

XI - 45

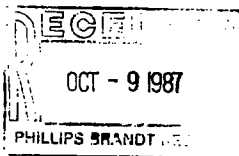
UNITED STATES
DEPARTMENT OF
AGRICULTURE

SOIL
CONSERVATION
SERVICE

P. O. BOX 50004
HONOLULU, HAWAII
96850

October 7, 1987

Mr. Thomas S. Witten, ASLA
PBR - Hawaii
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, HI 96813



Phillips Brandt Reddick

October 13, 1987

Dear Mr. Witten:

Subject: Environmental Impact Statement (EIS) Preparation Notice
for Punalu'u Resort, Punalu'u, Ka'u, Island of Hawaii

We have no comments to offer at this time, but would appreciate the
opportunity to review the draft EIS on this project.

Sincerely,

Mr. Richard N. Duncan
State Conservationist
U. S. Department of Agriculture
Soil Conservation Service
P. O. Box 50004
Honolulu, Hawaii 96850

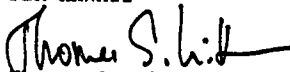
SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Duncan:

Thank you for reviewing the subject EISPN. A copy of the Draft
EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

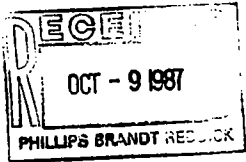

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

Landscape Architecture • Planning • Environmental Studies
Honolulu • Irvine • San Francisco • Denver
Financial Plaza of the Pacific • 130 Merchant Street, Suite 1111 • Honolulu, Hawaii 96813 • Tel. (808) 521-5631



U.S. DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
 Southwest Region • Western Pacific Program Office
 2570 Dole St. • Honolulu, Hawaii 96822-2398

October 7, 1987 F/SWR1:JJN

PBR Hawaii
 130 Merchant Street, Suite 1111
 Honolulu, HI 96813

ATTN: Mr. Thomas S. Witten

Dear Mr. Witten:

Subject: Environmental Impact Statement Preparation
 Notice (EISPN), Punalu'u Resort, Ka'u, Hawaii.

The National Marine Fisheries Service (NMFS) has reviewed the subject EISPN for the Punalu'u Resort, Ka'u, Hawaii. We understand the original EIS will be revised to reflect changes in the Resort Master Plan which were initiated to minimize potential impacts to the coastal areas and improve land use efficiency. We offer the following comments for your consideration.

As you know, the primary concern of NMFS relating to the proposed project is the potential impact to the endangered hawksbill turtle (Eretmochelys imbricata) nesting sites and threatened green turtle (Chelonia mydas) foraging grounds in nearshore waters off Punalu'u. Detailed information on the importance of the project area to these two listed species has previously been submitted to you in letters dated August 6, 1986, December 17, 1986 and April 3, 1987.

NMFS was involved in development of the original EIS, the final of which was published in January 1987. We feel this document for the most part adequately described those living marine resources for which we are responsible, potential impacts to these resources from project activities, and measures to mitigate potential impacts. These sections of the original EIS, particularly Chapter IV "Descriptions of the Affected Environment and Probable Environmental Consequences," should be included in their entirety in the revised Punalu'u Resort DEIS.

NMFS encourages the continued development of the Punalu'u Resort Environmental Protection Plan (EPP). We recommend the draft EPP be included in the DEIS and the final EPP, after technical input from NMFS and other Federal as well as State agencies, be included in the final EIS. Because of the importance of the Punalu'u area to the hawksbill and green turtle, NMFS recommends that sea turtles be included as a separate item for educational and interpretive actions as well as monitoring under the EPP objectives.

Thank you for the opportunity to comment on the subject revised EIS Preparation Notice. Please send us a copy of the Draft EIS as soon as it becomes available.

Sincerely yours,

John J. Naughton
 Acting Administrator

cc: F/SWR, Terminal Is., CA
 F/PR, Washington, D.C.
 FWS, Honolulu
 Corps of Engineers, Honolulu
 EPA, Region 9
 State Div. of Aquatic Resources
 County of Hawaii (Mr. Albert Lyman)

XI - 47



Phillips Brandt Reddick

October 13, 1987

Mr. John J. Naughton
Acting Administrator
U. S. Department of Commerce
National Marine Fisheries Service
2570 Dole Street
Honolulu, Hawaii 96822-2396

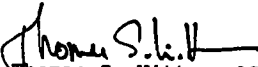
SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Naughton:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

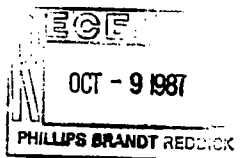


For the Protection of Hawaii's Native Wildlife

HAWAII AUDUBON SOCIETY

October 7, 1987

P.O. BOX 22852
HONOLULU, HAWAII 96822
P. O. Box 275
Volcano, HI 96785



Mr. Thomas S. Witten
PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Thank you for sending the Society the preparation notice for the environmental impact statement on the proposed Punalu'u Resort. The Society's concerns continue to focus on the potential adverse impacts on native wildlife and plant communities from a major resort complex in such close proximity to the coastline. Previous opposition to the project also has been based on the proposed dense construction and crowded visitor use of the singular natural and cultural resources at Punalu'u.

Moving the resort complex mauka would ease the pressures considerably on the shoreline. If low density urban zoning were retained, as well as siting the project upslope, deleterious environmental effects would be reduced substantially.

Up-to-date, thorough bird and plant surveys should be conducted now of the project sites, buffer zones, shoreline and ponds, since it is three years ago when the previous brief field surveys were made.

The EIS should present comprehensive treatment of potential impacts on the feeding, breeding and nesting habitats of rare sea turtles at Punalu'u Bay, inshore waters and sand dunes. The historic and present use of the area by threatened Pacific Green Sea Turtles, Olive (Pacific) Ridley Sea Turtles and Pacific Hawksbill Turtles should be described. Mitigation measures to help counter harmful impacts should be spelled out.

The statement should present the fully developed environmental protection plan, the predator control program, descriptions of the proposed displays depicting the natural ecology of the area, complete inventories of native flora and fauna in the area, and the proposed measures for protection and improvement of the wetland and strand vegetation communities.

Thank you for your consideration of these comments.

cc. County Planning Director

Sincerely yours,
Mae E. Mull
Mae E. Mull
Island of Hawaii Representative

Phillips Brandt Reddick

October 13, 1987

Ms. Mae E. Mull
Hawaii Audubon Society
Island of Hawaii Representative
P. O. Box 275
Volcano, Hawaii 96785

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Ms. Mull:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII
Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

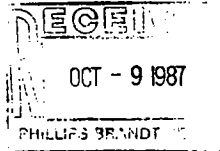
cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

XI - 49



U.S. Department of Housing and Urban Development
 Honolulu Office, Region IX
 300 Ala Moana Blvd., Room 3318, Box 50007
 Honolulu, Hawaii 96850-4991



October 7, 1987

Mr. Thomas S. Whitten, ASLA
 PBR HAWAII
 130 Merchant Street
 Suite 1111
 Honolulu, Hawaii 96813

Dear Mr. Whitten:

SUBJECT: Punaluu Resort
 Environmental Impact Statement Preparation Notice (EISPN)

We have reviewed the EISPN for the proposed 433 acre Punaluu Resort development that proposes 450-560 resort hotel rooms; 260-600 hotel condominium units; 124 multi-family residential units; and village commercial/services, golf course, open space and roads.

Due to the scale of the proposed development, a number of jobs will be created to service the hotels and other commercial/service activities. The need for housing these employees should be discussed in the Draft EIS and be coordinated with Hawaii County.

We appreciate the opportunity to comment on the Notice and look forward to receiving the Draft EIS.

Very sincerely yours,

Calvin Lew
 Calvin Lew
 Director
 Community Planning and
 Development Division

cc:
 9C D. James

Phillips Brandt Reddick

October 13, 1987

Mr. Calvin Lew, Director
 Community Planning and Development Division
 U. S. Department of Housing and
 Urban Development
 300 Ala Moana Blvd.
 Room 3318, Box 50007
 Honolulu, Hawaii 96850-4991

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
 KAU, HAWAII

Dear Mr. Lew:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII
Thomas S. Whitten
 Thomas S. Whitten, ASLA
 Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
 County of Hawaii

Office of Environmental Quality Control

DANIEL K. INOUE
HAWAII

United States Senate
ROOM 722, HART SENATE BUILDING
WASHINGTON, DC 20510
(202) 224-3934

PRINCE KUHIU FEDERAL BUILDING
SUITE 7325, 300 ALA MOANA BOULEVARD
HONOLULU, HI 96850
(808) 541-2542

OCT 13 1987
PHILLIPS BRANDT REDDICK

October 2, 1987

Phillips Brandt Reddick

October 16, 1987

Honorable Senator Daniel K. Inouye
United States Senator - Hawaii
United States Senate
Room 722, Hart Senate Building
Washington, D.C. 20510

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Honorable Senator Inouye:

Thank you for reviewing the subject EISPN. A copy of the Draft
EIS will be distributed to you for review and comment.

Sincerely,

PBR, HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

Mr. Thomas S. Witten, ASLA
Principal
PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

I wish to acknowledge receipt of the copy of the
Environmental Impact Preparation Notice on Punaluu Resort,
which you have kindly shared with me.

Within applicable rules and regulations, as you proceed on
this matter, I would like to be kept informed as to its
status.

Your assistance in this matter is appreciated.

Alpha

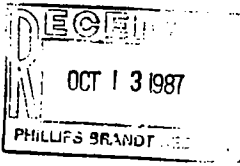
Daniel K. Inouye

DANIEL K. INOUE
United States Senator

DKI:pmr

XI - 51

JOHN WAIHEE
GOVERNOR OF HAWAII



JOHN C. LEWIN, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:
EPHSD

October 5, 1987

Mr. Thomas S. Witten
October 5, 1987
Page 2

Mr. Thomas S. Witten, ASLA
PBR Hawaii
130 Merchant St., Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Subject: Environmental Impact Statement Preparation Notice (EISPN) for Punalu'u
Resort, Ka'u, Island of Hawaii

Thank you for allowing us to review and comment on the subject EISPN. The following are our recommendations which should be addressed in the environmental impact statement (EIS):

XI - 52

Air Pollution

The EIS should include the potential impact on the ambient air quality as a result of the increase in vehicular activity from the proposed project, the proposed Hawaiian Riviera Resort, and all other projects which were previously approved but have not started construction. Projections on the increased traffic volume and the impact on the ambient air quality should be for the associated corridors, roadways, and highways. The results should be compared to the state and federal ambient air quality standards. Should a potential violation be determined, the EIS should address the mitigating actions which shall be implemented.

Water Pollution

The EIS must address how the sewage generated from the subject project will be treated and disposed, and the resulting impact on the environment. The EISPN indicated expansion of the resort and residential development along the open space corridors of the golf course fairways that will be irrigated with treated wastewater. The EIS should address the health and safety concerns of wastewater reuse. If spray irrigation is to be used, the EIS should address the establishment of buffer zones, degree of wastewater treatment, wind speed and perhaps drip irrigation along the fringe areas of habitation.

Drinking Water

The existing Punalu'u Resort is supplied by a private water system owned by the Hawaiiana Investment Company, Inc. which receives water from two groundwater wells. Please be advised that major modifications to the existing distribution system require Department of Health approval.

Section 11-29-30 requires that new or substantially modified distribution systems for public water systems be approved by the Director of Health. Such approval depends upon the submission of plans and specifications for the project prior to construction and the demonstration that the new or modified portions of the system are capable of delivering potable water in compliance to all maximum contaminant levels as set down in Chapter 20 once the distribution system or modification is completed.

If additional water sources are required to support the expanded development, please be advised that the well will be subject to the terms of Section 11-20-29.

Section 11-20-29 of Chapter 20 requires 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 satisfactory 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.

Should there be any questions regarding Chapter 20, Title 11, Administrative Rules, please contact the Drinking Water Program at 548-2235.

Sincerely yours,

BRUCE S. ANDERSON, Ph.D.
Deputy Director for
Environmental Health

cc: Chief Sanitarian, Hawaii

Phillips Brandt Reddick

October 16, 1987

Dr. Bruce S. Anderson
Deputy Director for Environmental Health
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96801


SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Dr. Anderson:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PEP HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

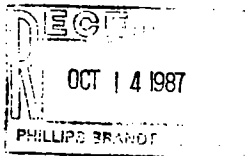
JOHN WAIHEE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TAXATION
P.O. BOX 259
HONOLULU, HAWAII 96809

RICHARD F. KAHLE, JR.
DIRECTOR OF TAXATION

GARY S. MIJO
DEPUTY DIRECTOR



Phillips Brandt Reddick

October 16, 1987

Mr. Lawrence J. Nakano
Income Technical Officer
Department of Taxation
P. O. Box 259
Honolulu, Hawaii 96809

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Nakano:

Thank you for reviewing the subject EISPN. A copy of the Draft
EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

October 8, 1987

PBR Hawaii
130 Merchant Street
Suite 1111
Honolulu, HI 96813

Attention: Mr. Thomas S. Witten, ASLA

Dear Mr. Witten:

Re: Environmental Impact Statement Preparation Notice
Punalu'u Resort

We have reviewed a copy of the G. Brewer Properties, Inc.
Preparation Notice for the Punalu'u Resort Draft Environmental
Impact Statement. To date, we have no comments to make with
respect to the tax revenue impact of your environmental impact
statement.

Thank you for the opportunity to comment on this matter.

Very truly yours,

Lawrence J. Nakano
LAWRENCE J. NAKANO
Income Technical Officer

LJN-MAD:jls

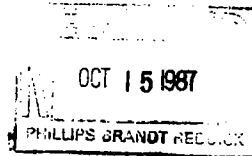
XI - 54

JAMES L. K. DAHLBERG
Councilman



COUNTY COUNCIL

County of Hawaii
Hawaii County Building
25 Aupuni Street
Hilo, Hawaii 96720




October 8, 1987

Mr. Thomas S. Witten, ASLA,
Principal, PBR Hawaii
130 Merchant Street, #1111
Honolulu, HI 96813

Dear Mr. ^{Tom}Witten:

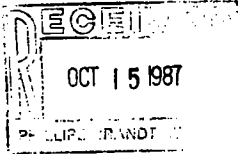
Just a note to thank you for your letter of October 6,
1987, and to say that I look forward to attending the workshop
you will be coordinating with the Council so we may be apprised
of the status of the Punaluu Resort proposal.

Sincerely,


James L. K. Dahlberg
COUNCILMAN

XI - 55

JOHN WAIHEE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813

October 13, 1987

DIRECTOR
EDWARD Y. HIRATA

DEPUTY DIRECTORS
JOHN K. UCHIMA
RONALD M. HIRANO
DAN T. KOCHI

IN REPLY REFER TO:
STP 8.2405

Phillips Brandt Reddick

October 16, 1987

Mr. Edward Y. Hirata, Director
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Mr. Thomas S. Witten, ASLA, Principal
Phillips Brandt Reddick
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Environmental Impact Statement Preparation
Notice (EISPN)
Punaluu Resort
Ka'u District, Hawaii

The subject EISPN did not provide sufficient information for us to determine the proposed development's impact on our transportation facilities. Consequently, a Traffic Impact Analysis Report should be prepared and made part of the draft environmental impact statement. Our initial evaluation indicates the existing Punaluu Road intersection may require improvements.

We may have additional comments following our review of the draft environmental impact statement.

Very truly yours,

Edward Y. Hirata
Director of Transportation

Dear Mr. Hirata:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBF HAWAII

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

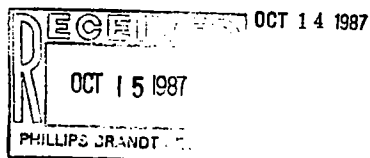
XI - 56



United States Department of the Interior

FISH AND WILDLIFE SERVICE
300 ALA MOANA BOULEVARD
P. O. BOX 50167
HONOLULU, HAWAII 96850

IN REPLY REFER TO:
ES
Room 6307



The Service will continue to provide staff assistance for the development of a final environmental protection plan for the Punalu'u Resort. Thank you once again for providing this opportunity to comment on the proposal.

Sincerely,

Ernest Kosaka
Field Supervisor, Environmental Services
Pacific Islands Office

Mr. Tom Witten
PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Thank you for your letter of September 11, 1987 concerning the Revised Draft Environmental Protection Plan for the Punalu'u Resort and the Environmental Impact Statement Preparation Notice. The Service has completed its review of these documents and offers the following remarks for your consideration.

Preparation Notice

The Preparation Notice addresses the Service's principal concerns regarding the potential impacts of the proposed resort upon coastal wetlands at Punalu'u and Ninole Cove. We are pleased that the revised statement will reflect the changes in the Resort Master Plan which were initiated through joint-agency meetings to avoid detrimental impacts to coastal wetlands.

Environmental Protection Plan

The Service recommends that the Plan be finalized and published with the environmental assessment. As discussed in Section II, efforts taken by the land owner or resort operator to limit access to certain coastal areas for conservation purposes should be consistent with State laws regarding public shoreline access. Perhaps a portion of the coast under private ownership could be designated as a "private nature preserve" with access and activities placed under the land owner's control through the guidance of the environmental protection plan. However, we suggest that restrictions on fishing might be limited only to pond waters on private lands, unless the State formally establishes a Marine Life Conservation District which encompasses nearshore coastal waters of Punalu'u Bay and for Ninole Cove.

cc: RD, FWS, Portland (AFWE)
NMFS-WPPO
EPA, SFO
PODCO-O
DLNR
County of HI Planning Dept.

XI - 57



Save Energy and You Serve America!

Phillips Brandt Reddick

October 16, 1987

Mr. Ernest Kosaka, Field Supervisor
U. S. Department of the Interior
Fish and Wildlife Service
300 Ala Moana Boulevard
P. O. Box 50167
Honolulu, Hawaii 96850

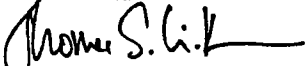
SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Kosaka:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBF HAWAII


Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

JOHN WAIHEE
GOVERNOR



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
465 SOUTH KING STREET, ROOM 104
HONOLULU, HAWAII 96813

October 13, 1987

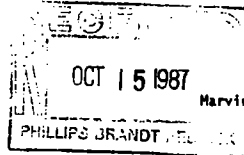
Mr. Thomas S. Witten, ASLA
PRB-Hawaii
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

Subject: EIS Preparation Notice for the Proposed Punalu'u
Resort, Punalu'u, Ka'u, Hawaii

The Office of Environmental Quality Control has reviewed
the subject preparation notice and has the following
comments:

1. The preparation notice identifies three coastal ponds at Punalu'u and states that Pond No. 1 (Dry Mauka Pond) will be secondarily affected by the project through environmental protection measures. The draft EIS should clarify the "environmental protection measures."
2. It is also stated that the offshore marine environment will be affected by the continued outflow of basal groundwater, the application of secondary treated wastewater and the use of herbicides and pesticides on the golf course. The estimated amount of secondary treated wastewater to be used for golf course irrigation should be included in the draft EIS. It should also describe the types and amounts of herbicides and pesticides to be used for the golf course.
3. The discovery of a new species of liverwort (bryophyte) near the shoreline of the resort is mentioned in the preparation notice. The significance of this bryophyte should be discussed in the draft EIS.



Marvin T. Miura, Ph.D.
DIRECTOR

TELEPHONE NO.
548-6915

Mr. Thomas S. Witten
October 13, 1987
Page 2

4. The draft EIS should also contain documentation of the faunal, coastal pond and marine surveys mentioned in the preparation notice.
5. A map of the 32 archaeological sites identified within the project site should be a part of the draft EIS.
6. The traffic and social impacts of the proposed project must also be discussed.
7. The draft EIS is required to disclose any known alternatives to the proposed action.

We hope that our comments will be helpful in the preparation of the draft EIS. Should you have any questions regarding these comments, please contact Faith Miyamoto at 548-6915.

Sincerely,

Marvin T. Miura, Ph.D.
Interim Director

Faith Miyamoto
Planner

cc: Mr. Albert Lono Lyman
County of Hawaii Planning Dept.

Phillips Brandt Reddick

October 16, 1987

Dr. Marvin T. Miura, Interim Director
Office of Environmental Quality Control
465 South King Street, Room 104
Honolulu, Hawaii 96813

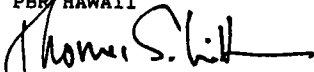
SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Dr. Miura:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR/HAWAII

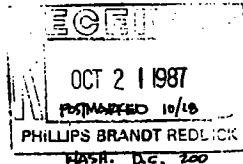

Thomas S. Witten, ASLA
Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

1987 October 5

TO : Mr. Thomas S. Witten
PBR
130 Merchant Street Suite 1111
Honolulu, Hawai'i 96813



Mr. Witten,

I hereby request to be a consulted party in the drafting
of the EIS for Punalu'u Resort, Punalu'u, Ka'u, Hawai'i.

A handwritten signature in cursive script that reads "David C. Penn".

David C. Penn
The International School of Beijing
c/o American Embassy
17 Guanghua Lu
Beijing
People's Republic of China

or

International Research and Training
Centre on Erosion and Sedimentation
PO Box 366
Beijing
People's Republic of China

Phillips Brandt Reddick

October 21, 1987

Mr. David C. Penn
The International School of Beijing
c/o American Embassy
17 Guanghua Lu
Beijing
People's Republic of China

SUBJECT: PUNALU'U RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Penn:

Please find enclosed a copy of the EISPN for the Punalu'u Resort. As a consulted party, please send any comments you may have to the addresses indicated on the EISPN cover letter. Although the formal 30 day period to request consulted party status has passed, we will include any comments you may have in the Draft EIS should they be received prior to printing the document.

Sincerely,

PBR HAWAII

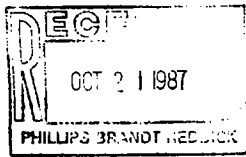
A handwritten signature in cursive script that reads "Thomas S. Witten".

Thomas S. Witten, ASLA
Principal

TSW/dt

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

WILLIAM W. PATY, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

LIBERT K. LANDGRAF
DEPUTY

AQUACULTURE DEVELOPMENT PROGRAM
AQUATIC RESOURCES CONSERVATION AND ENVIRONMENTAL AFFAIRS
CONSERVATION AND RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

DOC. NO.: 1548E
FILE NO.: 88-127

OCT 2 0 1987

PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Attn: Mr. Thomas S. Witten, ASIA

Dear Mr. Witten:

SUBJECT: Punalu'u Resort, Ka'u, Hawaii Environmental Impact Statement (EIS) Preparation Notice
TMRs: 9-5-19: various; 9-6-01: various; 9-6-2: various

Thank you for the opportunity to review the preparation notice cited above. We offer the following comments:

Aquatic Resources Concerns:

The County's Inventory of Public Shoreline Access noted "as a condition of approval for improvements with the shoreline area, public access will be provided...in accordance with Chapter 46-6-5, HRS. SMA No. 81, Variance No. 558." It is important, therefore, that expansion of resort and residential activities not interrupt this history of recreational importance by impeding public access or by degrading the natural resources which attract recreational use.

We suggest the forthcoming EIS discuss in detail potential short-term impacts (related to construction) and long-term effects (related to resort operation and residential occupation) of the changes proposed; among other topics, discussion should cover:

1. drainage effects (erosion and flood control, disposition of runoff, salinity changes, nutrient loading and possible contamination of coastal ponds and shorewaters);
2. wastewater effects (disposition, nutrient loading of ground and coastal waters);

PBR Hawaii

- 2 -

DOC. NO.: 1548E

3. specific access provisions (details of pedestrian and parking easements; provisions for transit and fishing along the shore); and
4. potential impact to turtle foraging, resting and nesting habitat should be addressed and mitigation measures proposed in coordination with input to be recommended by the Hawaiian Sea Turtle Recovery Planning Team. The EIS should project impacts, propose specific means for averting or minimizing adverse effects, and suggest possible mitigation or compensation for unavoidable damage to natural resource values.

Historic Sites Concerns:

Their plans regarding historic sites are basically unchanged. The only exception appears to be the inclusion of the major heiau just outside the project area in the cultural resources management plan, and we will be involved in the preparation of that plan.

Water and Land Development Concerns:

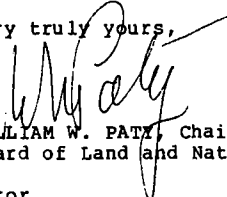
The EIS should address the impact of the project on Minole Stream which meanders through the 433-acre proposed development. Under the new water code, instream uses and channel modifications would require permits from the Commission on Water Management.

Forestry and Wildlife Concerns:

The EIS should fully discuss the presence of endangered waterbirds in, or their possible use of the brackish ponds on the site and steps to be taken to preserve the habitat during the design and construction stages. Any plans to introduce domestic wildlife on the premises (mallard ducks, etc.) should be cleared with the Division of Forestry and Wildlife to avoid harmful effects on native wildlife. More details are needed on the proposed predator control work, including method to be employed (poisons, traps, shooting) to avoid secondary harmful effects on native wildlife.

Thank you for your consideration of our concerns.

Very truly yours,


WILLIAM W. PATY, Chairperson
Board of Land and Natural Resources

cc: Hon. Albert Lono Lyman, Director
Hawaii Planning Dept.

Phillips Brandt Reddick

October 21, 1987

Mr. William W. Paty, Chairperson
Board of Land and Natural Resources
P. O. Box 621
Honolulu, Hawaii 96809

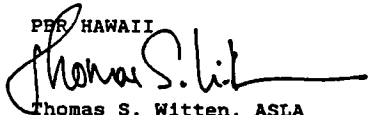
SUBJECT: PUNALU'U RESORT EIS PREPARATION NOTICE (EISPN)
KAU, HAWAII

Dear Mr. Paty:

Thank you for reviewing the subject EISPN and providing comments regarding the subject project. Your comments will be included in the Draft EIS of which a copy will be distributed to you for review and comment.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

TSW/dt

cc: Mr. Albert Lono Lyman, Planning Director
County of Hawaii

Office of Environmental Quality Control

XI - 63

XI - 64

November 9, 1987

Dear PBR:-

As I will be commenting on your upcoming Draft Environmental Impact Statement for Punaluu Resort as an individual, not in my capacity as a member of the Punaluu Preservation Committee, I would like to put in a request for a separate DEIS, if this is possible. I am willing to pay for this document, if necessary.

Thanking you for your kind attention to my above request, I remain

Yours Respectfully,

P.O. BOX W
NAALEHU, HI.
96772

Glen M. Winterbottom
GLEN M. WINTERBOTTOM

DANTE K. CARPENTER
MAYOR

HAWAII COUNTY FIRE DEPARTMENT

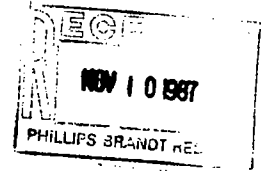
466 KING KOLE'S SMILE HAWAII 96720



FRANCIS E. SMITH
FIRE CHIEF

DON COLOMA
DEPUTY FIRE CHIEF

November 9, 1987



Mr. Thomas S. Witten, ASLA
Principal
Phillips Brandt Reddick
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

SUBJECT: PUNALU'U RESORT ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE

In response to your request of October 29, 1987, the following is submitted:

Item No.

- 1 The second 750 gpm pumper is assigned to the Pahala Volunteers as back-up for the paid fire fighters.
- 4 This six-man crew will be supervised by a Fire Captain assigned to the district by January 1, 1988.
- 5 Emergency medical services will be initiated from Naalehu January 1, 1988.

Very truly yours,

Francis E. Smith
FRANCIS E. SMITH
FIRE CHIEF

FES/mo

PHONE CALL

FOR <u>Tom</u>	DATE <u>9/28</u>	TIME <u>11:01</u>	<u>AM</u>
M <u>Reed Flickenger</u>			
OF <u>West Hawaii Today</u>		<input checked="" type="checkbox"/>	TELEPHONED
PHONE <u>Res. Punaluu G.B.</u>			RETURNED YOUR CALL
MESSAGE <u>When the draft and final are prepared, please send a copy to me.</u>			PLEASE CALL
<u>P.O. Box 789</u>			WILL CALL AGAIN
<u>Kailua-Kona, HI 96745</u>			CAME TO SEE YOU
SIGNED <u>Dubbie</u>			WANTS TO SEE YOU

TOPS FORM 4003

Phillips Brandt Reddick

October 13, 1987

Mr. Reed Flickenger
 West Hawaii Today
 P. O. Box 789
 Kailua-Kona, Hawaii 96745

SUBJECT: PUNALUU RESORT EIS PREPARATION NOTICE (EISPN)
 KAU, HAWAII

Dear Mr. Flickenger:

Thank you for your phone call regarding the subject EISPN. A copy of the Draft EIS will be distributed to you for review and comment.

Sincerely,

PBR HAWAII

Thomas S. Witten
 Thomas S. Witten, ASLA
 Principal

TSW/gw

cc: Mr. Albert Lono Lyman, Planning Director
 County of Hawaii

Office of Environmental Quality Control



**Chapter XII: Agencies, Organizations And Persons Who Were Sent A
Copy Of The Draft EIS; Written Comments Received During
The Public Review Period; And Responses**

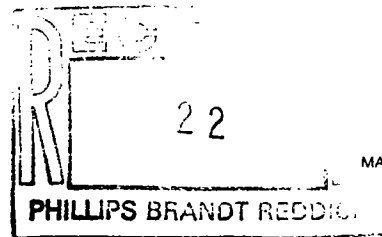
CHAPTER XII

AGENCIES, ORGANIZATIONS AND PERSONS WHO WERE SENT A COPY OF THE DRAFT EIS; WRITTEN COMMENTS RECEIVED DURING THE PUBLIC REVIEW PERIOD; AND RESPONSES

The Draft EIS (DEIS) was officially filed with the Hawaii County Planning Department and the Office of Environmental Quality Control (OEQC) on December 8, 1987 and notice of its availability was published in the OEQC Bulletin on December 8 and 23, 1987 and January 8, 1988. The Draft EIS was distributed to the federal, state, county and private groups and agencies listed on the Distribution List immediately following this page. The deadline for comments and the end of the 45-day review period was January 22, 1988.

Table XII-1 summarizes all letters received and displays them in two categories; substantive and non-substantive. Substantive letters raised specific concerns that were addressed in preparation of the Final EIS while non-substantive letters expressed "no comment". The letters appear in the same order as they are listed below.

JOHN WAIHEE
GOVERNOR



MARVIN T. MIURA, Ph.D.
DIRECTOR

TELEPHONE NO.
548-6915

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
465 SOUTH KING STREET, ROOM 104
HONOLULU, HAWAII 96813

December 21, 1987

Mr. Thomas S. Witten
PBR-Hawaii
130 Merchant St., Suite 1111
Honolulu, HI 96813

Dear Mr. Witten::

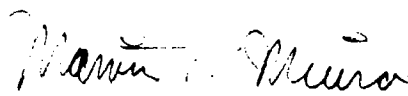
Subject: Draft Environmental Impact Statement for the
Punalu'u Resort, Punalu'u, Ka'u District, Hawaii

The Draft EIS was officially received by the Office of Environmental Quality Control on December 7, 1987 and was published in the December 8, 1987 OEOC Bulletin. The deadline for comments and the end of the 45-day public review period is January 22, 1988. We have requested all written comments be directed to the County of Hawaii Planning Dept. with copies to you..

Copies of the statement have been sent to the agencies, libraries, and organizations on the attached distribution list.

Should you have any questions regarding this EIS, please do not hesitate to contact Faith Miyamoto at 548-6915.

Sincerely,


Marvin T. Miura, Ph.D.
Interim Director

Attachment
cc: County of Hawaii Planning Dept. (w/attachment)

John Waihee
GOVERNOR



DEC 10 1987

DEC - 8 1987

DIRECTOR
TELEPHONE NO.
548-6615

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
485 SOUTH KING STREET, ROOM 104
HONOLULU, HAWAII 96813

December 7, 1987

Dear Reviewer:

Attached for your review is an Environmental Impact Statement (EIS) that was prepared pursuant to Chapter 343, Hawaii Revised Statutes and Chapter 11-200, Administrative Rules, EIS Rules:

TITLE: Punalu'u Resort

LOCATION: Punalu'u, Ka'u District, Hawaii

CLASSIFICATION: Applicant Action

Your comments or acknowledgments of no comments on the EIS are welcomed. Please submit your reply to the accepting authority or approving agency:

Mr. Albert L. Lyman, Director

County of Hawaii Planning Dept.

25 Aupuni St.

Hilo, Hawaii 96720

Please send a copy of your reply to the proposing party:

Mr. Thomas S. Witten

PBR-Hawaii

130 Merchant St., Suite 1111

Honolulu, Hawaii 96813

Your comments must be received or postmarked by: January 22, 1988

If you have no further use for this EIS, please return it to the Office of Environmental Quality Control.

Thank you for your participation in the EIS process.

12/10/87
Is comments
...

DISTRIBUTION LIST

() E.A.
 () APPLICANT ACTION
 () AGENCY ACTION

(x) EIS
 (x) APPLICANT ACTION
 () AGENCY ACTION

Title: Punalu'u Resort
 Location: Punalu'u, Ka'u District, Hawaii
 Proposing Agency/Applicant: C. Brewer Properties, Inc.
 Accepting Authority/Approving Agency: County of Hawaii Planning Dept.
 Deadline for Comments: January 22, 1988
 Date Sent/By: December 7, 1987 *ct*

<u>STATE AGENCIES</u>	<u>NO. COPIES</u>	<u>REMARKS</u>
OEQC	1	
Dept. of Agriculture	1	
Dept. of Accounting and General Services	1	
Dept. of Defense	1	
Dept. of Education (a)*	1	
Dept. of Hawaiian Home Lands (a)*	1	
Dept. of Health	1	
Dept. of Land and Natural Resources	3	
DLNR State Historic Preservation Officer	1	
Dept. of Business and Economic Development	1	
DBED Library	1	
Housing Finance & Development Corporation	1	
Dept. of Transportation	3	
State Archives	1	
State Energy Office	1	
<u>UNIVERSITY OF HAWAII</u>		
Environmental Center	4	
Marine Programs (a)*	1	
Water Resources Research Center	1	
<u>FEDERAL</u>		
Army-DAFE (Facilities Eng.-USASCH)	1	
Environmental Protection Agency (a)*		
Navy	1	
Soil Conservation Service	1	
U.S. Army Corps of Engineers	1	
U.S. Coast Guard	1	
U.S. Fish and Wildlife Service	1	
U.S. Geological Survey (a)*	1	

Library Copy: 2
 Total Received: 80
 Total Distributed: 80
 File Copy: 1

Copy of Distribution List Sent to: Hawaii Plng. Dept.;
 Date: DEC 21 1987
C. Brewer; PBR Hawaii

(a)* Copy desired only if project involves the agency's responsibilities

<u>LIBRARIES</u>	<u>NO. COPIES</u>	<u>REMARKS</u>
State Main Library	2	
REGIONALS:		
Kaimuki Regional Library	1	
Kaneohe Regional Library	1	
Pearl City Regional Library	1	
Hilo Regional Library	1	
Wailuku Regional Library	1	
Lihue Regional Library	1	
OAHU:		
Aiea Library		
Aina Haina Library		
Ewa Beach Community-School Library		
Hawaii Kai Library		
Kahuku Community-School Library		
Kailua Library		
Kalihi-Palama Library		
Liliha Library		
Manoa Library		
McCully-Moiliili Library		
Mililani Library		
Wahiawa Library		
Waialua Library		
Waianae Library		
Waikiki-Kapahulu Library		
Waimanalo Community-School Library		
Waipahu Library		
HAWAII		
Bond Memorial (Kohala) Library		
Holualoa Library		
Honokaa Library		
Kailua-Kona Library	1	
Keaau Community-School Library	1	
Kealahou Library		
Laupahoehoe Community-School Library		
Mountain View Community-School Library	1	
Pahala Community-School Library	1	
Pahoa Community-School Library	1	
Thelma Parker Memorial Library/Waimea Area Library		
MAUI		
Kahului Library		
Lahaina Library		
Makawao Library		
MOLOKAI		
Molokai Library		
LANAI		
Lanai Community-School Library		
KAUAI		
Hanapepe Library		
Kapaa Library		
Koloa Community-School Library		
Waimea Library		

DISTRIBUTION LIST
(Continued)

STATE AGENCIES

Department of Taxation
Office of the Governor
Department of Budget and Finance

FEDERAL

Department of Housing and Urban Development
Department of Commerce - National Marine Fisheries Service

COUNTY OF HAWAII

Fire Department
Department of Water Supply
Department Parks and Recreation
Police Department
Hawaii Redevelopment Agency
Research and Development

OTHERS

Councilmember James Dahlberg
Native Hawaiian Legal Corporation
Hawaii Conference Foundation
Representative Wayne Metcalf
Hawaii Audubon Society
Senator Daniel Inouye
David Penn
Glen Winterbottom
West Hawaii Today

Table XII-1

Punalu'u Resort DEIS Summary of Comments Received

NAME/ AGENCY OF RESPONDENT	DATE OF LETTER	DATE OF PBR RESPONSE	CONTENTS: NON-SUBSTANTIVE	CONTENTS: SUBSTANTIVE	WRITER'S TOPIC OF CONCERN
TEJUANE TOMINAGA/ STATE DEPT OF ACC & GEN SERV	12/11/87	2/ 5/88	X		
CAPTAIN R. M. GALLEN/ DEPARTMENT OF THE NAVY	12/11/87	2/ 5/88	X		
YUKIO TAKEMOTO/ STATE DEPT OF BUDGET & FINANCE	12/10/87	2/ 5/88	X		
MAJOR JERRY M. MATSUDA/ STATE DEPARTMENT OF DEFENSE	12/15/87	2/ 5/88	X		
H. WILLIAM SEWAKE/ COUNTY DEPARTMENT OF WATER SUPPLY	12/16/87	2/ 5/88	X		
RALSTON H. NAGATA/ STATE DEPT OF LAND & NATURAL RES	12/18/87	3/ 2/88		X	COMMENTS ON CULTURAL RESOURCE MANAGEMENT PLAN
RUSSELL M. FUKUMOTO/ STATE BUSINESS & ECONOMIC DEV	1/11/88	3/18/88		X	EMPLOYEE HOUSING
WILLIAM W. PATY/ STATE DEPT OF LAND & NATURAL RES	1/14/88	3/ 2/88		X	AQUATIC RESOURCES, FORESTRY AND WILDLIFE, WATER AND LAND DEVELOPMENT, HISTORIC SITES
CHARLES T. TOGUCHI/ STATE DEPARTMENT OF EDUCATION	12/16/87	2/ 8/88		X	PROJECTED SCHOOL ENROLLMENT
ERNEST KOSAKA/ DEPT OF INTERIOR, FISH & WILDLIFE	1/19/88	3/18/88		X	IMPACTS UPON COASTAL PONDS AND WATERBIRDS
KISUK CHEUNG/ DEPARTMENT OF THE ARMY	1/14/88	3/ 2/88		X	FIRM MAPS
DOYLE E. GATES/ U.S. DEPT OF COMMERCE, NOAA	1/19/88	3/ 1/88		X	ENVIRONMENTAL PROTECTION PLAN, LAND USE DESCRIPTIONS/APPROVALS, PROTECTED SPECIES
DOYLE E. GATES/ U.S. DEPT OF COMMERCE, NOAA		3/15/88		X	RESPONSE TO LETTER FROM PBR HAWAII, 3/ 1/88
PATRICIA ENGELHARD/ COUNTY DEPT OF PARKS & RECREATION	1/20/88	2/ 2/88		X	WHITTINGTON AND PUNALU'U BEACH PARK SWIMMING, KAMAOA (SOUTH POINT), NAALEHU AND PAHALA PARKS
HUGH Y. OMO/ COUNTY DEPARTMENT OF PUBLIC WORKS	1/ 5/88	3/ 2/88		X	DRYWELLS, TRAFFIC IMPACT STUDY, ROADWAY DESIGN SPEED, STORM WATER TREATMENT PLAN
BANGAY ESTATE	1/11/88	3/22/88 (KWSK)		X	LAND OWNERSHIP
HENRY K. BOSCHARD/ MOKUAIKAUA CHURCH	1/12/88	3/18/88		X	CHURCH AND CEMETERY ON THE BLUFF OVERLOOKING PUNALU'U BAY
ELSA K. DEDMAN	1/22/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
EARL NELLER	1/22/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
KAMAKI A. KANAHELE III/ STATE OFFICE OF HAWAIIAN AFFAIRS	1/21/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
SUZANNE D. PETERSON/ STATE DEPARTMENT OF AGRICULTURE	1/21/88	2/ 5/88	X		
BRUCE S. ANDERSON, PH.D./ STATE DEPARTMENT OF HEALTH	1/19/88	3/ 3/88		X	AIR POLLUTION AND WATER POLLUTION
WILLIAM MEYER/ DEPT OF INTERIOR, GEOLOGIC SURVEY	1/20/88	2/ 5/88	X		
JAMES A. RICHARDS/ HAWAII CONFERENCE FOUNDATION	1/22/88	3/18/88		X	ACCESS, AMBIENCE AND INFRASTRUCTURE
GLEN M. WINTERBOTTOM	1/20/88	3/ 4/88		X	COPY OF "A COMMON-SENSE LOOK AT THE DRAFT EIS FOR PUNALU'U RESORT"
GLEN M. WINTERBOTTOM/ PUNALU'U PRESERVATION COMMITTEE	1/20/88	3/ 4/88		X	COPIES OF PETITIONS TO PRESERVE PUNALU'U BEACH AND NINOLE COVE, LETTER FROM STATE ENVIRONMENTAL CONTROL
JOHN T. HARRISON/ UH ENVIRONMENTAL CENTER	1/22/88	3/18/88		X	SOCIAL CONCERNS, NEARSHORE AND MARINE ENVIRONMENT WATER QUALITY, WASTEWATER, FIGURE IV-14, PAGES 68 AND 75, APPENDICES E AND H, ARCHAEOLOGY
KA OHANA O KALAE	1/22/88	3/ 4/88		X	COASTAL RESOURCES, VISUAL CHARACTERISTICS, NATURAL HAZARDS, PUBLIC SHORELINE ACCESS, DRAFT EPP, HISTORIC SITES, NATIVE HAWAIIAN RIGHTS, SOCIOECONOMIC IMPACTS, RECREATIONAL RESOURCES, MARKET ASSESSMENT/PROJECT FEASIBILITY, FISCAL IMPACT ANALYSIS, ALTERNATIVES, REGIONAL PLANNING ISSUES

Table XII-1

**Punalu'u Resort DEIS Summary of Comments Received
(Continued)**

NAME/ AGENCY OF RESPONDENT	DATE OF LETTER	DATE OF PDR RESPONSE	CONTENTS: NON-SUBSTANTIVE	CONTENTS: SUBSTANTIVE	WRITER'S TOPIC OF CONCERN
ROGER A. ULVELING/ STATE BUSINESS & ECONOMIC DEV	1/21/88	3/18/88		X	NEED FOR THE PROJECT, WORK FORCE, CRITICAL MASS AND IMPLICATIONS FOR ADJACENT LANDS, SPACE LAUNCHING FACILITY, TRAFFIC IMPACTS
ALBERT LONG LYMAN/ COUNTY PLANNING DEPARTMENT	1/22/88	3/18/88		X	SHORELINE ACCESS, OLD GOVT ROAD AND TRAILS, FLOODING, WASTEWATER, WATER QUALITY, VIEWS, GEOLOGIC HAZARDS, REFERENCE CORRECTIONS
LINDA LYERLY	1/19/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
CECIL S. CARMICHAEL	1/14/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
WINONA E. RUBIN/ STATE SOCIAL SERVICES & HOUSING	1/12/88	3/18/88		X	
PELE HANOA	1/19/88	3/ 3/88		X	RECREATION, GOVT ROAD AND TRAIL HISTORIC SITES, BARE COASTLINE, NATURAL BEAUTY
J. KEOLALANI HANOA	1/20/88	3/ 3/88		X	KULEANA LANDS, ENVIRONMENTAL CONCERNS, HISTORIC SITES, NATIVE RIGHTS
NELLE M. RUPLEY	1/22/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
KATHERINE R. GRACE	1/22/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
MARKATHERYN A. BROOKS	1/20/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
CHRIS BENGAY	1/21/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
SAM KALUNA	1/21/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
ERIC AND PERNILA SILLITO	1/20/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
BEVERLY BYOUK	1/21/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
MR. AND MRS. A. L. HOWARD	1/21/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
DR. RICHARD C. HARDISON	1/21/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
MADELINE P. CASTANEDA	1/21/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
JESSIE KE	1/20/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
CHARLES A. W. LEE/ SEAMOUNTAIN RESORT, INC.	1/21/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
JEAN S. SHIBUYA	1/20/88	3/ 3/88		X	IN SUPPORT OF PUNALU'U RESORT
KENAA LEE HONG	1/21/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
PAULINE S. HANOA	1/22/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
BERNARD KELIKOA	1/19/88	3/ 3/88		X	OPPOSITION TO PUNALU'U RESORT
CALVIN LEW/ U.S. DEPT OF HOUSING & URBAN DEV	1/28/88	3/ 3/88		X	HOUSING PROJECTS
EDWARD Y. HIRATA/ STATE DEPARTMENT OF TRANSPORTATION	2/17/88	3/18/88		X	ROADWAYS AND INFRASTRUCTURE
KA OHANA O KALAE	2/18/88	3/18/88		X	MARINE CONSERVATION DISTRICT
KA OHANA O KALAE		3/24/88		X	PRIVATE LAND OWNERSHIP



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
DIVISION OF PUBLIC WORKS
P. O. BOX 116, HONOLULU, HAWAII 96810

RUSSEL S. MAGATA
COMPTROLLER

REN KITABU
DEPUTY COMPTROLLER

LETTER NO. (P)2099.7

JUL 11 1987

Mr. Albert L. Lyman
Director
Planning Department
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Subject: Draft Environmental Impact Statement
Punaluu Resort

We have reviewed the subject document and have no
comments to offer.

Very truly yours,

Teuane Tominaga
TEUANE TOMINAGA
State Public Works Engineer

EM:jk

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
Department of Accounting and General Services
Division of Public Works
P.O. Box 119
Honolulu, Hawaii 96810

Attention: Mr. Teuane Tominaga,
State Public Works Engineer

SUBJECT: PUNALUU RESORT DRAFT EIS

Dear Mr. Tominaga:

This is to acknowledge receipt of your letter of December 11,
1987 regarding the subject project. Thank you for participating
in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988
Department of the Navy
Naval Base Pearl Harbor
P.O. Box 110
Pearl Harbor, Hawaii 96860-5020
Attention: Captain R.M. Gallen,
Base Civil Engineer

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Captain Gallen:

This is to acknowledge receipt of your letter of December 11, 1987 regarding the subject project. Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813
TELEPHONE (808) 521-3631 TELECOPYER 6880254102
HONOLULU BRANCH OFFICE

REPRODUCED AT GOVERNMENT'S EXPENSE

5090' P1487P
Ser N5B/2918

JUL 1987

DEPARTMENT OF THE NAVY

COMMANDER
NAVAL BASE PEARL HARBOR
BOX 110
PEARL HARBOR, HAWAII 96860-5020

PHILLIPS BRANDT REDUICK

Mr. Albert L. Lyman, Director
County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
PUNALU'U RESORT

The Draft EIS for the Punalu'u Resort has been reviewed and we have no comments to offer. Since we have no further use for the EIS, it is being returned to the Office of Environmental Quality Control.

Thank you for the opportunity to review the Draft EIS.

Sincerely,

THOMAS S. WITTEN
Principal
PBR HAWAII
130 MERCHANT STREET, SUITE 1111
HONOLULU, HAWAII 96813

Enclosure

Copy to:
Mr. Thomas S. Witten
PBR-Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

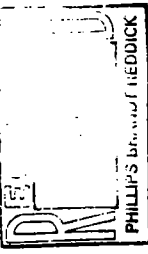
Office of Environmental Quality Control

YUKIO TAKEMOTO
DIRECTOR
ROBERT P. TAKUSHI
ASSISTANT DIRECTOR
Thomas I. Yamashiro
Deputy Director
DIVISIONS:
BUCKLE, PLANNING AND MANAGEMENT
ELECTRICAL DATA PROCESSING
FINANCE
Telecommunications



STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE
STATE CAPITOL
P.O. BOX 138
HONOLULU, HAWAII 96810-0138

December 10, 1987



PHILLIPS BROTHERS HEDDICK
EMPLOYEES' RETIREMENT SYSTEM
HAWAII PUBLIC EMPLOYEES HEALTH FUND
OFFICE OF THE PUBLIC DEFENDER
PUBLIC UTILITIES COMMISSION

Mr. Albert L. Lyman, Director
County of Hawaii
Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Punaluu Resort, Kau District, County of Hawaii.

This agency has no comments on the project.

Sincerely,

Yukio Takemoto
YUKIO TAKEMOTO

cc: ✓ Mr. Thomas S. Witten

February 5, 1988

State of Hawaii
Department of Budget and Finance
State Capitol
P.O. Box 150
Honolulu, Hawaii 96810-0150

Attention: Mr. Yukio Takemoto,
Director

SUBJECT: PUNALUU RESORT DRAFT EIS

Dear Mr. Takemoto:

This is to acknowledge receipt of your letter of December 10, 1987 regarding the subject project. Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

February 5, 1988

Hawaii National Guard
State of Hawaii
Department of Defense
Office of the Adjutant General
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

Attention: Major Jerry M. Matsuda,
Contractor and Engineer

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Major Matsuda:

This is to acknowledge receipt of your letter of December 15, 1987 regarding the subject project. Thank you for participating in the Draft EIS review process.

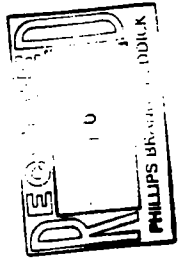
Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-5631 TELECOPIER: (808) 523-1102
HONOLULU BRANCH DE VAPER



PHILLIPS SERVICE STATION
PUNALU'U

DEC 15 1987

Engineering Office

Mr. Albert L. Lyman, Director
County of Hawaii Planning Dept.
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Punalu'u Resort
Punalu'u, Ka'u District, Hawaii

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.

Sincerely,

Jerry M. Matsuda
Major, Hawaii Air
National Guard
Contr & Engr Officer

Enclosure

cc: Mr. Thomas S. Witten /



COPY

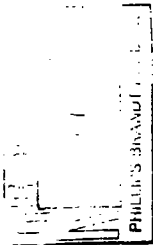
DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

25 AUPUNI STREET • HILO, HAWAII 96720

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

PBR
HAWAII

December 16, 1987



TO: Planning Department
FROM: H. William Sewake, Manager
SUBJECT: PUNALU'U RESORT
ENVIRONMENTAL IMPACT STATEMENT

We have reviewed the subject document and have no additional comments to offer.

Through a copy of this letter, the document is being returned to the Office of Environmental Quality Control.

H. William Sewake

for H. William Sewake
Manager

0A

cc - Mr. Thomas S. Witten
Office of Environmental Quality Control (w/enc.)

February 5, 1988

County of Hawaii
Department of Water Supply
25 Aupuni Street
Hilo, Hawaii 96720

Attention: Mr. William H. Sewake,
Manager

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Sewake:

This is to acknowledge receipt of your letter of December 16, 1987 regarding the subject project. Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

... Water brings progress...



PHILLIPS
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF STATE PARKS
P. O. BOX 451
HONOLULU, HAWAII 96809

December 18, 1987

Mr. Thomas S. Witten
Phillips Brandt Reddick
Financial Plaza of the Pacific
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Dear Mr. Witten:

SUBJECT: Comments on Cultural Resource Management Plan
Punalu'u Resort
Punalu'u, Ka'u, Hawaii

Thank you for letter of November 30, 1987, which submitted the outline of your Cultural Resources Management Plan (CRMP) (M. Rosendahl 1987) to us for review.

We do have a number of comments to make. We first have two general comments:

1. It would be much more useful to call this a Historic Sites Management Plan. This is the term more commonly being used now. And it specifically identifies what you are concerned with (historic sites), rather than the more ambiguous term cultural resources. Also, within the plan, rather than use the word "cultural resources", the term "historic sites" or "historic properties" should be used.
2. It is important that such plans not be bulky and that they be simple and easy to use. There is no need to have a massive document. The 32 existing historic sites have already been identified and their significance has been evaluated; thus, you do not have to include detailed site descriptions or justifications for their significance assessments. The plan should simply cover what is now known about the history of the area, what sites are present, their significance, and specifically how you propose to treat the sites.

Our specific comments follow:

1. The Approach of the Punalu'u Resort CRMP (pp. 1-3).
 - a. We do like the statement at the bottom of page 1 -- that the plan "can be supplemented and revised to

LIBERT K. LANDGRAF
DEPUTY

AGRICULTURE DEVELOPMENT
AQUATIC RESOURCES
CONSERVATION AND
ENVIRONMENTAL AFFAIRS
CULTURAL RESOURCES ENFORCEMENT
CONSERVATION
FORESTRY AND WILDLIFE
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

Mr. Thomas S. Witten
Page 2
December 18, 1987

respond to additional information and concerns". This is a key point for flexibility.

b. The proposed outline of the plan (pp. 2-3). This may be too extensive. For example, items B. 1-4 have already been done. Sites have been identified and described, and their significance has been determined, and general mitigation plans have been agreed upon for all existing sites.

2. Punalu'u: Environment & History (pp. 3-4). We would like to recommend that this section be a major part of the document. An in-depth interpretation of past land use in the ahupua'a included in the resort is needed, based on the existing archaeological, historical, and oral historical information. It should clearly show what is known and what is not yet known.

3. Nature & Significance of Cultural Resources in the Punalu'u Resort (pp. 4-7). We recommend that this section be kept relatively short and address only existing historic sites. The sites need only to be clearly listed in one table with formal and functional typologies noted and to be clearly presented on a map. Also, the significance of each site, as already determined, should be briefly listed in a table, with some text to clarify. A discussion of the three value modes can then follow as in items 2 and 3 on page 7.

4. Data Recovery Program Considerations (pp. 12-16). It is our understanding that only 7 of the existing sites may undergo data recovery, if they are not preserved. Rather than a long discussion of different levels of work, we recommend specific plans for these sites -- if the decision is made to data recover them. Additional archaeological work is planned in some of the 20 sites to be preserved. However, such work should only occur when additional information is needed to help interpret the sites. Data recovery is not appropriate in these cases, only minimal excavation. Therefore the minimal excavation at these sites should be discussed (with specifics for each site) under the Interpretive Program Considerations.

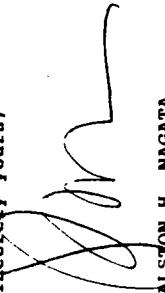
5. As we understand the latest plans, there is to be a section relative to effects on sites in adjacent parcels -- the heiau, for example. We do not see such a section in this outline.

Mr. Thomas S. Witten
Page 3
December 18, 1987

6. There probably also should be a separate section discussing curation of remains and notes. This should include finds and notes from prior work. The reason for a separate section is that this is a relatively important task in itself.

We hope you find these comments useful. If you have any questions, please feel free to call Dr. Ross Cordy, our Head Archaeologist, at 548-7460. He is our contact person for this project.

Sincerely yours,



RALSTON H. NAGATA
State Parks Administrator and Deputy
State Historic Preservation Officer

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
Department of Land and Natural Resources
Division of State Parks
P.O. Box 621
Honolulu, Hawaii 96809

Attention: Ralston H. Nagata,
State Parks Administrator and Deputy
State Historic Preservation Officer

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Nagata:

This is to acknowledge receipt of your letter of December 18, 1987 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 2, 1988

State of Hawaii
Department of Land and Natural Resources
Division of State Parks
P.O. Box 621
Honolulu, Hawaii 96809

Attention: Mr. Ralston H. Nagata,
State Parks Administrator and Deputy
State Historic Preservation Officer

SUBJECT: PUNALU'U RESORT, KA'U HAWAII
CULTURAL RESOURCES MANAGEMENT PLAN

Dear Mr. Nagata:

Thank you for your letter of December 18, 1987 regarding the subject document. The following are provided in response to your comments.

General Comment Responses:

1. The document will be retitled "Historic Sites Management Plan" per your suggestion. Further, within the plan the terms "historic sites" or "historic properties" will replace the presently used "cultural resources" term.
2. We agree that the plan should not be bulky and that it should be easy to use. We will continue to work with your office to assure that the plan meets both your requirements, our client's and the general public's needs.

Specific Comment Responses:

1. a. We are pleased that you are in agreement with the concept of maintaining flexibility in the plan. We believe that this will allow maximum utilization of the document and accomplishment of the purposes of the document in the most efficient manner.
1. b. We, in association with our archaeological consultant, Dr. Paul H. Rosendahl, will carefully review the plan outline and delete those items that have already been performed and/or are not required. The final Draft Plan Outline will be reviewed with your staff prior to publication in the Final EIS.

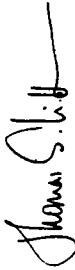
Mr. Ralston H. Nagata
PUNALU'U RESORT DRAFT EIS
March 2, 1988
Page 2

2. Per your request we will strengthen the Environment and History section of the plan.
3. The Nature and Significance of Cultural Resources in the Punalu'u Resort section of the plan will be modified per your request and suggestions.
4. The specific type of data recovery for the various sites will be discussed in the plan per your suggestion.
5. Additional information relative to the potential effects on sites in adjacent parcels will be added to the final Draft Outline Plan and to the Final EIS, Chapter IV, Section 3.2.2.
6. Per your suggestion, a new section discussing curation of remains and notes will be included in the Historic Sites Management Plan.

Thank you again for your comments. Please be assured that we will continue to work with your office in the preparation of the Historic Sites Management Plan. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynihan, Senior Vice President,
C. Brewer Properties, Inc.

JOHN WAINHEE
GOVERNOR



RUSSELL N. FUKUMOTO
Acting Executive Director

STATE OF HAWAII
Department of Business and Economic Development
Housing Finance and Development Corporation

P. O. BOX 17887
HONOLULU, HAWAII 96817

IN REPLY REFER

TO:

88:PLNG/140JT

January 11, 1988

Mr. Albert L. Lyman, Director
January 11, 1988
Page 2

Thus, assuming (1) an annual income of \$28,000, (2) a 30-year mortgage loan at 9.5% interest, (3) a CTF of \$100, and (4) monthly payments equivalent to 28% of gross income, the range of maximum affordable home prices are as follows:

Down payment:	5%	10%	15%
Sales price:	\$69,300	\$73,100	\$77,400

Thank you for the opportunity to comment.

Sincerely,

Russell N. Fukumoto
RUSSELL N. FUKUMOTO
Acting Executive Director

Mr. Albert L. Lyman, Director
County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Subject: Draft Environmental Impact Statement (EIS)
for Punalu'u Resort, Ka'u District, Hawaii

We have reviewed the subject EIS and have the following comments relative to employee housing.

We are pleased that the applicant is committed to providing sufficient employee housing units and, if needed, support services (i.e., daycare centers and shuttle bus service). For planning purposes, however, we believe that approximately 65% of new nonmanagerial and nonspecialty employees may be in need of housing assistance. This compares to an estimated 20-40% presented in the analysis.

Our estimate is based upon the household income distribution information provided in Table IV-40 and the following additional assumptions:

1. A 10% down payment instead of the 15% used in the analysis. (One of the barriers to homeownership is having a sufficient amount of savings for a down payment. A review of conventional Hula Mae loans purchased by our agency indicates that about 50% of all borrowers made a 5-9% down payment and nearly 32% of all borrowers made a 10-14% down payment.)
2. The monthly payment includes a customer trust fund (CTF) of \$100 for such things as real property taxes, homeowner's insurance and maintenance fees.

cc: Mr. Thomas S. Witten, PBR Hawaii

XII - 17

February 5, 1988

State of Hawaii
Department of Business and Economic Development
Housing Finance and Development Corporation
P.O. Box 17907
Honolulu, Hawaii 96817

Attention: Russell N. Fukumoto,
Acting Executive Director

SUBJECT: PUNALU'U RESORT DRAFT EIS

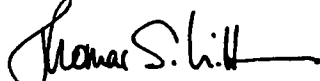
Dear Mr. Fukumoto:

This is to acknowledge receipt of your letter of January 11, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR, HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 18, 1988

State of Hawaii
Department of Business and
Economic Development
Housing Finance and Development Corporation
P.O. Box 17907
Honolulu, Hawaii 96817

Attention: Mr. Russell N. Fukumoto,
Acting Executive Director

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Fukumoto:

Thank you for the copy of your letter of January 11, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject Draft EIS. The following is provided in response to your letter.

To assure that we provide a detailed and complete response to your letter, we have requested that our marketing, economics and housing requirements subcontractor, Peat Marwick Main & Company respond to the issues you have raised. Their response is attached hereto.

In brief, although the analysis of housing requirements and affordability included in the Draft EIS did not allocate a portion of family housing budgets for customer trust fund (CTF) accounts, the study did allocate a conservative 28 percent of gross household income to cover mortgage payments. It is noted that lenders in Hawaii generally base housing loan qualification on up to 35 percent of household income.

With regard to the use of a 15 percent down payment assumed in the Draft EIS affordability analysis, the analysis in the Draft EIS could be overly optimistic for families using Hula Mae financing. However, Hula Mae loans tend to involve relatively low down payments, whereas FHA and conventional home loan financing programs do not involve caps on down payment amounts.

XII
-
18

Mr. Russell N. Fukumoto
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 2


March 1, 1988

As a result of re-examining the housing affordability analysis included in the Draft EIS, in light of the points raised in your letter, the estimates of new Resort employee related households requiring assistance or subsidy has been amended to represent 30 to 50 percent of non-managerial and non-supervisory employment-related housing demand. This information will be reflected in the Final EIS.

Thank you for your comments and participation in the EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.
Ms. W. E. Rubin, Director,
State Department of Social Services and Housing

Mr. Brendan G. Moynahan
C. Brewer Properties, Inc.
745 Fort Street
Honolulu, Hawaii 96813

Re: Punalu'u Resort Draft Environmental Impact Statement dated
December 1987 (DEIS)

Dear Mr. Moynahan:

This letter responds to the January 11, 1988 letter from Mr. Russell N. Fukumoto, then Acting Executive Director of the Hawaii State Department of Business and Economic Development, Housing Finance and Development Corporation (HFDC) to Mr. Albert Lono Lyman, Director of the County of Hawaii Planning Department, concerning the referenced DEIS.

The HFDC questions our employee housing affordability analysis with respect to monthly household budgets and down payments. These issues are addressed below; we also comment on our assumptions regarding mortgage interest rates.

MONTHLY HOUSEHOLD HOUSING BUDGETS

The HFDC is correct in noting that our study did not allocate a portion of family housing budgets for customer trust fund (CTF) expenses such as real property taxes, homeowner's insurance and maintenance fees. At the estimated \$100 per month, such items would significantly reduce the amount of a moderate income family's budget that could be applied to a home mortgage.

However, our study allocated a conservative 28% of gross household income to cover mortgage payments, whereas lenders in Hawaii frequently base housing loan qualification, including allowances to cover CTFs, on up to 35% of household income. Thus with a gross income of \$28,000 in 1986 dollars, the hypothetical household considered in the referenced letter could qualify for up to \$163 more per month ($\$28,000 * (35\% - 28\%)$) than assumed in our affordability calculations. This could more than offset the estimated \$100 per month CTF expenditures.

~~RFMS~~ Peat Marwick

Mr. Brendan G. Moynahan
March 1, 1988
2

MORTGAGE LOAN DOWN PAYMENTS

The HFDC also questions the 15% downpayment assumed in the DEIS affordability analysis, since about 82% of conventional Hula Mae housing loans purchased by the HFDC involved only a 5% to 14% downpayment. As noted in the letter, the difference between a 5% and 15% downpayment at this income level could represent about \$8,000 in achievable home purchase price. Given the loan data provided, our analysis could be overly optimistic for families using Hula Mae financing.

However, Hula Mae loans tend to involve relatively low down payments, since the program limits the percentage value of down payments. In contrast, Federal Housing Authority insured (FHA) and conventional home loans financing programs impose no such caps on the share of home purchase price that can be put down. Unfortunately, we do not have appropriate data on down payments values under the latter loan programs.

Furthermore, the household income distribution upon which our analysis relies is conservative for the housing need group considered. The income data is based on observations of hotel industry employees in the state, whereas the housing need projection refers to the direct, indirect and induced effects of Punalu'u Resort's expansion, including significant non-hotel industry employment. Since wages and salaries in the hotel industry tend to be lower than those in other sectors of the state's economy, the earnings of indirect and induced effect employees of the Resort could be greater than those assumed in the DEIS housing analysis.

Nevertheless, with a 5% to 10% down payment, holding other assumptions as stated in the DEIS, a household with \$28,000 in annual income, in 1986 dollars, could be expected to be able to finance an \$81,500 to \$85,500 home purchase. In other words, using the data presented in the DEIS, Table IV-40, the approximately 20% of in-migrant households to the Ka'u region who are expected to earn between \$22,500 and \$28,000 in 1986 dollars would be able to choose from at least 37%, but less than 57% of the one- or more-bedroom homes listed for sale in the region in 1986.

MORTGAGE INTEREST RATES

Finally, our analysis, like the HFDC analysis, assumed a 9.5% mortgage interest rate. Although this would be a favorable market rate at the current time, under the Farmers Home Administration (FmHA) loan program, qualifying households may receive significant subsidies on going interest rates. Compared to a market rate loan, such subsidies can double or triple the home loan amount that a qualifying low- income household could qualify for.

~~RFMS~~ Peat Marwick

Mr. Brendan G. Moynahan
March 1, 1988
3

CONCLUSIONS

In conclusion, given the issues raised by the HFDC, we feel that our assumptions regarding monthly household housing budgets are fair, whereas our assumption regarding 15% down payments could be aggressive in certain cases. Offsetting this, our assumption of 9.5% interest rates is probably overly conservative with regard to those households qualifying for mortgage rate subsidies under FmHA. However, because adequate data is not available to indicate what share of in-migrant employee households to Ka'u could qualify for such subsidies, we have amended our estimates of new Resort employee related households requiring assistance or subsidy to represent 30% to 50% of nonmanagerial and nonsupervisory employment-related housing demand.

This revised assumption, along with other adjustments to the housing analysis necessary due to errors in the draft report, will be reflected in the Final EIS for Punalu'u. Our preliminary calculations indicate that affordable housing requirements attributable to direct, indirect and induced employment opportunities generated by Punalu'u Resort's further development could amount to about 250 to 550 homes at project completion. This compares with 236 to 497 homes as noted in the DEIS, Table IV-41.

* * * * *

Thank you for calling these issues to our attention and for this opportunity to refine our analyses. Please call me or Mr. Malcolm Tom, partner in charge of the Management Consulting Department at Peat Marwick, if you have any further comments or questions.

Very truly yours,

PEAT MARWICK MAIN & CO.


Ann M. Bouslog
Manager

AMB:lsa
Enc.

cc: Endre Mott-Smith
Tom Witten
Gordon Chapman

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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

WILLIAM W. PATY, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

LIBERT R. LANDGRAF
DEPUTY

AQUACULTURE DEVELOPMENT PROGRAM
AQUATIC RESOURCES CONSERVATION AND ENVIRONMENTAL AFFAIRS
CONSERVATION AND RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

JAN 14 1988

FILE NO.: 88-278
DOC. NO.: 2382E

Honorable Albert Lono Lyman -2-

Doc. 2382E

Honorable Albert Lono Lyman, Director
County of Hawaii
Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman,

SUBJECT: Punaluu Resorts, Draft EIS. TMK: 9-15-19: var;
9-6-01: var.

We have reviewed the Draft Environmental Impact Statement for the project cited above and have the following comments to offer:

Division of Aquatic Resources:

The applicant has provided some information on mitigating possible impacts of drainage water, landscaping and agriculture chemicals, waste disposal, nutrient enrichment, and a flood improvement plan for Ninole Stream and Bay. The turbulence and sediment plume created during the restoration of Ninole Bay should be temporary and impacts to aquatic resources minimal; aquatic habitats should be enhanced over the long term along with the recreational value of the cove. However, a monthly monitoring program for Ninole Bay should be established and measures proposed to prevent or mitigate unforeseen impacts adverse to aquatic resource values that may occur.

The DEIS notes that two species of endangered or threatened sea turtles are known to frequent the offshore waters and forage in the area. The restoration of Ninole Cove would provide about 2,000 lineal feet of new shoreline which is expected to provide habitat for fish, invertebrates, and additional turtle grazing areas.

The planned isolation and protection of the existing pond sites as aquatic and wildlife habitat appears to be adequately described in the DEIS.

The applicant has detailed specific provisions for maintaining and improving public access to and enjoyment of the shore, although some concerns have been expressed in the past by "Ka ohana o Kalae", a native Hawaiian organization representing most of the Kau community. Information has been provided on the public park and beach plus the proposed facilities to accommodate the public.

Finally, precautions should be taken during construction to prevent contaminants from excessively flowing, leaching or blowing into coastal waters.

Division of Forestry and Wildlife:

In general, the documentation relative to flora and fauna is adequate. One possible exception is the lack of listing the Hawaiian owl (*Asio flammeus sandwichensis*) as a possible inhabitant of the grassland habitats. Although there is a discussion of impacts on the aquatic (pond) habitats and possible "improvements" by filling a dry pond, adding buffer vegetation and restricting access, the development plan indicates that the ponds will be incorporated into a golf course (holes 8 and 9). In that the hole alignment involves driving lanes directly over the ponds, and (it is assumed) golf cart and/or pedestrian traffic, impacts should be discussed. The value of these ponds to water oriented wildlife will be lessened by disturbance and the proximity of trails, golf greens and fairways and the restaurant, should be revealed in the E. I. S.

Division of Water and Land Development:

There is no objection relative to our programs. However, a permit to modify Ninole Stream would be required once the new Commission on Water Resource Management adopts its rules on the State Water Code.

Also, necessary precautions should be taken to prevent any potential contamination of the existing well below the highway by the planned mauka developments.

Historic Sites Section:

This Draft EIS very adequately reviews the sites present in the project area and their significance assessments, which our office agreed with over a year ago. It also correctly presents the general mitigation plan, which our office agreed with. This plan commits the development to preservation of certain significant sites and appropriate actions for others. The resulting impact determination becomes one of "no adverse effect" to significant historic sites, assuming the plans are adequately executed.

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The provision for adequacy checks by our office and the County's Planning Department, noted in this Draft EIS, will help ensure that detailed plans are successfully developed and executed. We are also actively involved in the preparation of the Cultural Resource Management Plan.

Again, we are concerned that public input on the significance assessments and the preservation plans will occur. Comments on significance assessments will undoubtedly occur in response to this Draft EIS. We will work with the preparers of the management plan to be sure these two matters are handled.

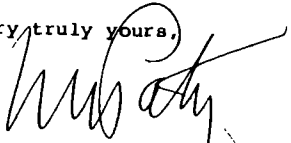
Last, we understood that impacts to the two large heiau in adjacent lands on the shore, resulting from greater numbers of people in the area, might be considered in this Draft EIS. We note that access will remain as today (IV-185), but we could find no discussion of impacts.

Recreation:

The Draft EIS appears to adequately address shoreline access and recreation concerns.

Thank you for the opportunity to review and comments on this project.

Very truly yours,


WILLIAM W. PATY, Chairman
Board of Land and Natural Resources

cc: Mr. Thomas Witten

February 5, 1988

State of Hawaii
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Attention: William W. Paty, Chairman,
Board of Land and Natural Resources

SUBJECT: PUNALU'U RESORT DRAFT EIS

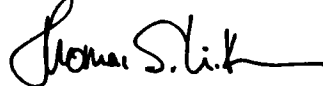
Dear Mr. Paty:

This is to acknowledge receipt of your letter of January 14, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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Mr. William W. Paty
PUNALU'U RESORT DRAFT EIS
March 2, 1988
Page 2

March 2, 1988

State of Hawaii
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Attention: Mr. William W. Paty, Chairman,
Board of Land and Natural Resources

SUBJECT: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Paty:

Thank you for the copy of your letter of January 14, 1988 regarding the subject EIS to Mr. Albert Lono Lyman, Director, County of Hawaii Planning Department. The following is provided in response to your letter.

Division of Aquatic Resources

Although the project that was proposed in 1986 and 1987 included restoration of Ninole Cove, that element of the project has been deleted from the scope of the presently proposed project. It was our intention to delete all references to the restoration of Ninole Cove from the Draft EIS, but we may have unintentionally missed a few references. We apologize for any inconvenience these oversights may have caused.

The restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project and the complex and costly permitting requirements. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. We would be pleased to work with your, or any other interested agency, in the planning and restoration of the cove.

Deletion of this former element of the project eliminates all temporary or permanent impacts that might have been caused as a result of the restoration work.

As noted in the Draft Environmental Protection Plan (Appendix H), water quality monitoring would be performed as required to better define baseline conditions and to detect and characterize variations. By agreement between the U.S. National Fisheries Service and C. Brewer Properties, Inc., the Final Environmental Protection Plan will be prepared at the time SMA and Corps of Engineers permit applications are prepared and submitted. This timing will allow the plan to specifically address construction activities and the mitigation of possible adverse environmental impacts that might result from those activities. Construction details at the present are not defined to the extent required to prepare the Final Environmental Protection Plan. The Final Environmental Protection Plan would be prepared by C. Brewer Properties, Inc. in cooperation with appropriate federal, state, county and private agencies and groups, including the Department of Land and Natural Resources.

As noted in the Draft Environmental Protection Plan (Appendix H), as well as in Chapter IV, Section 2.4.1.3, appropriate mitigation measures will be taken, including adherence to all applicable federal, state and county environmental protection regulations, to prevent contaminants excessively flowing, leaching or blowing into coastal waters. These measures will be included in the Final Environmental Protection Plan.

Division of Forestry

The faunal survey included in the Draft EIS (Appendix B), describes the avifauna observed during the survey conducted for the proposed project as well as those species that were conspicuously absent. Although not observed during the survey, the possibility of the Hawaiian Owl (*Asio flammeus sandwichensis*) occurring in the grassland habitat will be noted in Chapter IV, Section 2.2.4 of the Final EIS.

As noted in Chapter IV, Section 2.4.1.2 of the Draft EIS, pending approval of appropriate federal and state agencies, the connection between the dry mauka pond and Pond No. 1 would be restored and the ponds cleared of debris. This connection would create additional wetland and pond habitats. No other modification or reconfiguring of these two ponds is planned, nor is filling of any of the ponds planned. The ponds within the golf course would be provided with landscape buffers consisting, to the greatest extent possible, of native strand vegetation, thereby providing protection to the wildlife that inhabit the ponds. It is believed that the protection that the ponds will be afforded will be greater than that now available and, as such, beneficial to the wildlife and habitats.

Mr. William W. Paty
PUNALU'U RESORT DRAFT EIS
March 2, 1988
Page 3

Division of Water and Land Development

The proposed project does not include any further modifications to Ninole Stream. The stream bed would be monitored and cleared of debris on a periodic basis to aid in the prevention of flood damage. Should future conditions change such that modifications to the stream bed alignment appear desirable, all appropriate federal and state regulations would be followed prior to commencing any such work. Appropriate measures will be taken to prevent contamination of C. Brewer Properties, Inc. potable water wells below the highway.

Historic Sites Section

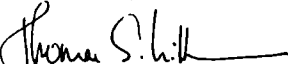
We appreciate the efforts of the Department's Historic Sites Section in the development of the Cultural Resources Management Plans and will continue to work with them in the preparation of future plans and the preservation of significant historic and cultural sites within the property.

Additional information regarding potential impacts to adjacent sites will be included in Chapter IV, Section 3.2.2 of the Final EIS. As you may be aware, we have contacted both your agency and the Kamehameha Schools/ B. P. Bishop Estate regarding plans for the heiau on State and Bishop Estate lands. It is our understanding at this time that neither land owner has any plans to alter the present status of those heiau, but we will continue our discussions to allow incorporation, if possible, into the Historic Sites Management Plan for the Resort.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 2360
HONOLULU, HAWAII 96804

December 16, 1987

19
PHILLIPS BRANDT TRUST

OFFICE OF THE SUPERINTENDENT

Mr. Albert L. Lyman, Director
County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

SUBJECT: PUNALU'U RESORT

Our review of your proposed development indicates that it may generate the following enrollment impact on our area schools:

SCHOOL	GRADE	APPROXIMATE ENROLLMENT
Ka'u High & Pahala Elem.	K-12	90 - 170

The projection is based upon the proposed 2,200 - 3,100 residential and resort units.

Ka'u High and Pahala Elementary School is operating at near capacity. The Department of Education cannot assure the availability of classroom space at the impacted school and may require legislative appropriation on a timely basis to accommodate the project plans.

Please keep us informed of any changes to the project plans.

Sincerely,
Charles T. Toguchi
Charles T. Toguchi
Superintendent

CTT:jl (MRI)

cc E. Imai, OBS
A. Garson, Hawaii Dist.
T. Witten, PBR-Hawaii

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804

Attention: Charles T. Toguchi,
Superintendent

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Toguchi:

This is to acknowledge receipt of your letter of December 16, 1987 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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February 8, 1988

State of Hawaii
Department of Education
P. O. Box 2360
Honolulu, Hawaii 96804

Attention: Mr. Charles T. Toguchi,
Superintendent

Subject: PUNALU'U RESORT DRAFT EIS

Dear Mr. Toguchi:

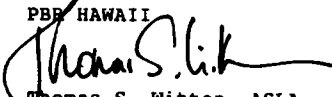
Thank you for the copy of your letter of December 16, 1987 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department, regarding the subject project. The following is provided in response to your letter.

The information regarding the projected increase in enrollment of Ka'u High School and Pahala Elementary School is generally included in the Draft EIS, based on earlier information provided by your department (see Chapter IV, Section 6.1). The latest numbers included in the above referenced letter will be included in the Final EIS along with the notation regarding operating capacity of the schools and future funding requirements.

Thank you for your comments and participating in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402

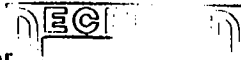
HONOLULU IRVINE DENVER



United States Department of the Interior

FISH AND WILDLIFE SERVICE

300 ALA MOANA BOULEVARD
P. O. BOX 50167
HONOLULU, HAWAII 96850



IN 2
IN REPLY REFER TO:
ESSRA
Room 6307

19 JAN 1988

Mr. Thomas S. Witten
PBR-Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

Re: Draft Environmental Impact Statement for the Punalu'u
Resort, Ka'u District, Hawaii

Dear Mr. Witten:

We are pleased that the document adequately addresses both fish and wildlife resources in the project area and the probable environmental consequences of the proposed development upon these resources. A few discrepancies exist, however, in the discussion of impact upon coastal ponds and waterbirds. The following specific suggestions are offered for your consideration during preparation of the final environmental impact statement.

a. Page I-8, Paragraph 5.4; and Page IV-72, Paragraph 2.4.4. These paragraphs contain statements that are contradicted in the document. The first of these two paragraphs indicates that the coastal ponds will not be affected by the proposed development. The second paragraph suggests that the developer will leave the coastal ponds in their natural state to attract and protect wildlife. Elsewhere in the statement, plans for creating a connection between the dry mauka pond and Pond No. 1 are revealed, along with plans to clear strand vegetation and to create golf holes and tees immediately adjacent to these two ponds. Figure IV-19 shows that both multifamily residential and village hotel complexes will be situated within 100 feet or less of the mauka pond. These plans do not necessarily suggest that the ponds will either remain in their natural state or be attractive to wildlife.

b. Page IV-39, Paragraph 2.1.3.2. The statement that a limited amount of strand vegetation between the mauka dry pond and Pond No. 1 would be removed by construction of the golf holes is contradicted in paragraph 2.1.4.3 on page IV-41, where it is stated that existing strand vegetation around the ponds will be retained.

c. Figure IV-19. This illustration depicts the areal relationship between the coastal ponds and the adjoining development. If the ponds are to provide suitable habitat for waterbirds, it may be appropriate to leave a well vegetated buffer between the golf course and the residential areas. We would also recommend that buildings greater than 35 feet in height be kept at least 200 feet back from the boundary of the ponds to provide a suitable buffer for waterbirds.

We acknowledge that the fairways and greens for golf holes 8 and 9 will enhance habitat for migratory shorebirds and provide suitable open spaces for endangered Hawaiian coots and stilts. The native wetland plants described in paragraph 2.1.5 (page IV-41) will provide both food and cover for these birds. However, we suspect that residues of pesticides used on the greens and fairways for holes 8 and 9 will leach rapidly into pond and nearshore waters. Therefore, we recommend that the mitigation measures discussed in both the document and Appendix H be fully implemented during construction and operation of the proposed resort complex.

Thank you for providing this opportunity to comment. My staff will continue to cooperate with you in finalizing the natural resource management plan for the proposed resort.

Sincerely,

William R. Kramer
Ernest Kosaka, Field Supervisor
Environmental Services
Pacific Islands Office

cc: NMFS-WPPO
DLNR
DAR
DOFAW
DOH
DBED/CZM

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Save Energy and You Serve America!

February 5, 1988

United States Department of the Interior
Fish and Wildlife Service
300 Ala Moana Boulevard
P.O. Box 50167
Honolulu, Hawaii 96850

Attention: Ernest Kosaka, Field Supervisor,
Environmental Services
Pacific Islands Office

SUBJECT: PUNALU'U RESORT DRAFT EIS


Dear Mr. Kosaka:

This is to acknowledge receipt of your letter of January 19, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 18, 1988

United States Department of the Interior
Fish and Wildlife Service
300 Ala Moana Boulevard
P.O. Box 50167
Honolulu, Hawaii 96850

Attention: Mr. Ernest Kosaka, Field Supervisor
Environmental Services, Pacific Islands Office

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Kosaka:

Thank you for your letter of January 19, 1988 regarding the subject project. The following is provided in response to your comments.

- a. As you note, inconsistencies were included in our discussion of the potential impacts on the coastal ponds and wildlife inhabiting those ponds. Please be assured that these inconsistencies were oversights and will be corrected during preparation of the Final EIS. We appreciate your bringing these inconsistencies to our attention and apologize for any inconvenience they may have caused.

For clarification, pending approval by appropriate federal and state agencies, the proposed project includes restoring the connection between Pond No. 1 and the presently dry mauka pond as well as clearing debris and overgrowth from both ponds. These actions will be accomplished by (1) removing the manmade earthen barrier that currently separates the two "ponds", to allow both groundwater and sea water to flow freely into and out of both ponds and (2) by hand clearing debris and overgrowth that have grown and collected in the ponds over the past several years. It is believed that these actions will result in improved habitats for both the euryhaline species found in the ponds and the waterbirds frequenting the ponds.

Further, the areas surrounding both ponds would be landscaped, utilizing native strand vegetation to the greatest extent possible, to screen the ponds as well as act as barriers to human intrusion, thereby providing better protection than that currently existing.

The multifamily and hotel structures planned for the area, would, at the closest point to the ponds, be approximately 80 feet from the present dry mauka pond and, per county zoning regulations, not exceed 45 feet in height. Major hotel facilities would be located on the bluff above and at least 300 feet mauka of the ponds. The lines shown on Figure IV-19 are intended to show the general land use areas for the planned facilities, not the specific locations of facilities. The specific locations of facilities and buildings will be determined at a later date and will take into consideration the environmental sensitivity of the ponds and coastal plain.

With regard to the strand vegetation, approximately 10 acres of the existing vegetation (see Draft EIS, Appendix B for description) will be cleared to create golf holes 8 and 9 and that vegetation will be replaced by grass and native strand vegetation appropriate for the location, especially around the ponds. As you are aware, at present this area is subjected to frequent vehicular traffic and the development of the golf holes along with other measures to limit vehicular traffic in the area are expected to increase the habitat value of the area.

- b. As noted above, development of the new golf holes will require removal of approximately 10 acres of the present vegetation. This vegetation will be replaced to the maximum extent possible with native strand vegetation in our efforts to both protect the wildlife inhabiting and frequenting the ponds as well as increase the habitat value of the ponds.
- c. As noted above, structures located on the lower coastal level of the Resort would be 80 feet from the nearest pond. The height of structures, as presently planned, would be 35 feet for the multifamily residences and 45 feet for hotel buildings, as is allowed by county zoning regulations.

- d. It is possible that residues of the chemicals - biocides - used on the golf course, would leach into coastal area groundwaters and nearshore areas. As noted in Appendix G (Impacts of Biocides and Fertilizers on the Nearshore Marine Environment at Punalu'u Resort, Ka'u, Hawaii), the majority of the pesticides to be used are relatively benign to marine organisms and degrade naturally fairly quickly. Those that could possibly pose a threat to marine or brackish water organisms (Tersan and Diazinon) are used relatively infrequently and in quantities that are diluted to the extent that, based on manufacturers required testing, they pose minimal danger to the wildlife. Approximately 4 gallons of Diazinon and 44 pounds of Tersan are used annually on the golf course and landscape areas (approximately 178 acres) of the Resort. The analyses by Murdoch and Green (see Appendix C, South Kohala Resort Final EIS), given the limitations and restrictions of their studies, tend to support the premise that the biocides and fertilizers used on golf courses on the Big Island would have little effect on coastal ponds or offshore waters.

As noted in the Draft EIS (Chapter IV, Section 2.4.1.1), the estimated outflow from Pond No. 1 (which will be reconnected to the dry mauka pond) has been measured and is estimated to range, at low tide, between about 4.5 cubic feet per second (cfs) and about 20 cfs, depending on the season and size of the opening to the ocean. Given a pond surface area of about three acres and an average depth of about two feet, this translates into a maximum flushing of about eight times per 24-hour period and a minimum flushing of approximately twice every 24-hour period of the pond, assuming total mixing and exchange of the pond water. Because of this relatively rapid flushing, it is highly unlikely that the minute quantities of residues that might leach into the ponds would accumulate in the sediments or reside in the pond water column for sufficient periods to be taken up by aquatic organisms in concentrations that would adversely affect those organisms.

Following flushing from the ponds, the low concentrations of chemicals that might leach into the ponds would be rapidly dispersed throughout the offshore water column, thereby further diluting concentrations and reducing potential

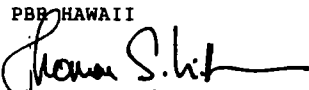
Mr. Ernest Kosaka
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 4

toxicity effects (see Appendix F of Draft EIS for water current and circulation patterns). As noted in Appendix H (Draft Environmental Protection Plan) to the Draft EIS, water quality monitoring would be performed prior to, during and after construction and operation of the Resort to assure that potential adverse impacts from resort operations do not occur or are immediately controlled and mitigation measures employed to minimize those impacts. As stated above, all chemicals used on the golf course and landscape areas would be applied per manufacturers instructions and only applied when the possibility of runoff and/or leaching is minimal, i.e., during periods of no or low rainfall. As noted throughout the Draft EIS, it is C. Brewer's intention to protect and preserve the naturally occurring environment at Punalu'u to the greatest extent possible, for both the enjoyment of the residents of the area and visitors to the resort.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBB HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
BUILDING 230
FT. SHAFTER, HAWAII 96858 -5440

REPLY TO
ATTENTION OF:
Planning Branch

January 14, 1988

Mr. Albert L. Lyman, Director
County of Hawaii Planning Dept.
25 Aupuni St.
Hilo, Hawaii 96720

Dear Mr. Lyman:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the proposed Punalu'u Resort, Ka'u District, Hawaii. The following comments are offered:

a. As noted on page I-23 of the DEIS, a Department of the Army permit is required if the pond connections are made. The project planners have coordinated the proposal with Operations Branch.

b. Our earlier comments regarding flood hazards (letter included in DEIS, page X-39) are still current. The DEIS discussion of flood hazards (pages IV-10 and IV-17, and Figure IV-6) should incorporate the September 1986 revision of the Flood Insurance Rate Maps (copy of relevant portion enclosed).

Sincerely,

Kisuk Cheung
Chief, Engineering Division

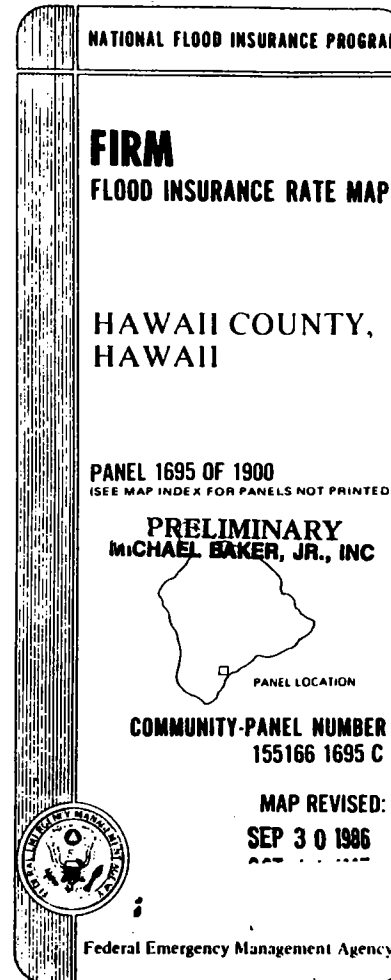
Enclosure

Copy Furnished:

Mr. Thomas S. Witten
PBR-HAWAII
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

13 - IIX

F



LEGEND

- SPECIAL FLOOD HAZARD AREAS INUNDATED BY 100-YEAR FLOOD
- ZONE A** No base flood elevations determined
- ZONE AE** Base flood elevations determined
- ZONE AH** Flood depths of 1 to 3 feet in usually areas of ponding; base flood elevations determined
- ZONE AD** Flood depths of 3 to 6 feet usually steep flow on sloping terrain; average depths determined; for areas of gradual run flood the velocities also determine
- ZONE A99** To be protected from 100-year flood by Federal flood protection system under construction; no base elevations determined
- ZONE V** Coastal flood with velocity hazard (wave action); no base flood elevations determined
- ZONE VE** Coastal flood with velocity hazard (wave action); base flood elevations determined
- FLOODWAY AREAS IN ZONE AE
- OTHER FLOOD AREAS**
- ZONE X** Areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 100-year flood
- OTHER AREAS**
- ZONE X** Areas determined to be outside 500-year flood plain
- ZONE D** Areas in which flood hazards are undetermined
- Flood Boundary
- Floodway Boundary
- Zone D Boundary
- Boundary Dividing Special Flood Hazard Zones, and Boundary Dividing Areas of Different Coastal Base Flood Elevations Within Special Flood Hazard Zones.
- 513 Base Flood Elevation Line; Elevation in Feet*
- Cross Section Line
- IEL 9871 Base Flood Elevation in Feet Where Uniform Within Zone*
- RM7x Elevation Reference Mark
- M20 Coastline Mile

*Referenced to the National Geodetic Vertical Datum of 1929

NOTES

This map is for use in administering the National Flood Insurance Program. It does not necessarily identify all areas subject to flooding particularly from local drainage sources of small size or all planimetric features outside special flood hazard areas.

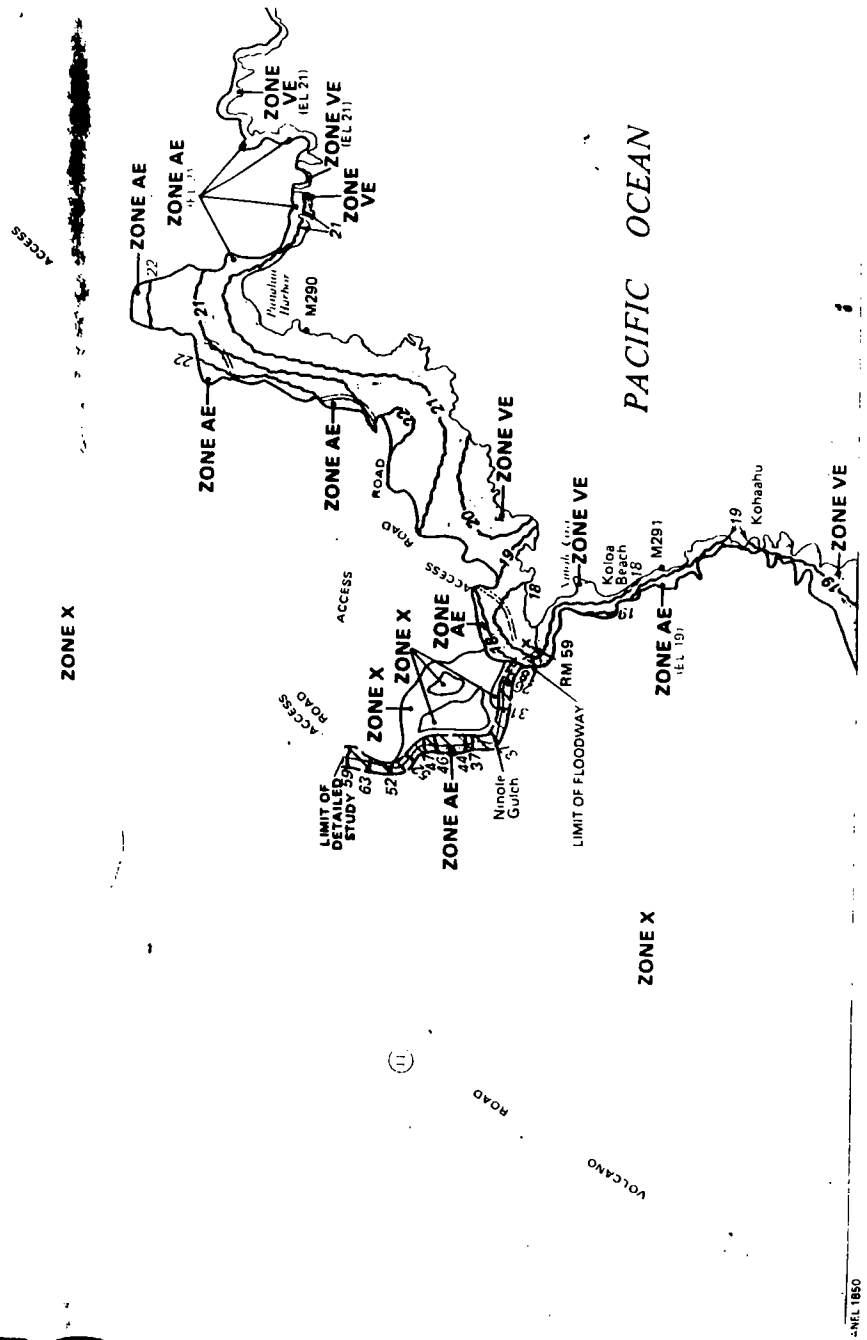
Certain areas not in Special Flood Hazard Areas may be protected by flood control structures.

Boundaries of the floodways were computed at cross sections and interpolated between cross sections. The floodways were based on a study of considerations with regard to requirements of the Federal Emergency Management Agency.

Floodway widths in some areas may be too narrow to show to scale. Floodway widths are provided in the Flood Insurance Study Report.

Coastal base flood elevations apply only landward of the shoreline.

For more information on the National Flood Insurance Program, contact the Federal Emergency Management Agency.



PBR HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Department of the Army
U.S. Army Engineer District, Honolulu
Building 230
Ft. Shafter, Hawaii 96858-5440

Attention: Kisuk Cheung,
Chief, Engineering Division

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Cheung:

This is to acknowledge receipt of your letter of January 14, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 2, 1988

Department of the Army
U.S. Army Engineer District, Honolulu
Building 230
Fort Shafter, Hawaii 96858-5440

Attention: Mr. Kisuk Cheung,
Chief, Engineering Division

SUBJECT: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Cheung:

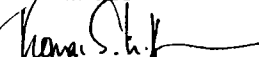
Thank you for the copy of your letter of January 14, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject project. The following is provided in response to your letter.

- a. Please be assured that we will continue to work with your agency regarding the reconnection of the dry mauka pond and Pond No. 1. Your staff has provided valuable guidance during the planning for the proposed completion of the Resort.
- b. The Final EIS will incorporate the September 1986 revision of the Flood Insurance Rate Maps provided with your letter. Similarly, per your letter of September 29, 1987 regarding project parcels that are adjacent to or near Zone X, we will coordinate flood hazard prevention measures with the County Department of Public Works.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII



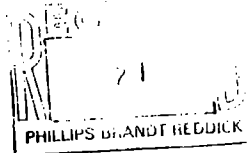
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
 Southwest Region • Western Pacific Program Office
 8570 Dale St. • Honolulu, Hawaii 96822-8388

January 19, 1988 F/SWR1:JJN



Mr. Albert L. Lyman, Director
 County of Hawaii Planning Department
 25 Aupuni Street
 Hilo, Hawaii 96720

Dear Mr. Lyman:

Subject: Draft Environmental Impact Statement (DEIS),
 Punalu'u Resort, Punalu'u, Ka'u District,
 County of Hawaii. C. Brewer Properties, Inc.

The National Marine Fisheries Service (NMFS) has reviewed the subject DEIS for the Punalu'u Resort, Punalu'u, Ka'u District, County of Hawaii. The original DEIS and Final EIS were prepared and submitted for Punalu'u Resort in October 1986 and January 1987, respectively. It is our understanding that due to issues raised by the County of Hawaii, the developer withdrew the EIS from consideration. Subsequently, the master development plan has been revised in response to community concerns and the subject revised DEIS has been prepared. NMFS offers the following comments on the revised DEIS for your consideration.

General Comments

As you know NMFS has been involved in developing the original EIS as well as the subject revised DEIS. Our letter of October 7, 1987 commenting on the revised EIS Preparation Notice can be found on page X-47 in Chapter X of the subject document. As stated in this letter our major concern is potential impacts to endangered hawksbill turtle (*Eretmochelys imbricata*) nesting sites and threatened green turtle (*Chelonia mydas*) foraging grounds in nearshore waters at Punalu'u. The subject DEIS describes these resources briefly but adequately on pages IV 51 to 54.

NMFS feels the most important aspect of the proposed resort project, as far as the protection of marine resources including threatened and endangered species, is implementation of the Punalu'u Resort Environmental Protection Plan (EPP), a draft of which is included in Appendix H of the subject DEIS. Our concern is that that EPP as presently written is too general, particularly in dealing with sea turtles in the project area. The EPP should be finalized prior to the developer submitting the Final EIS.

In order to assure full protection of marine and terrestrial resources, NMFS recommends a meeting be held, possibly at the proposed development site, to finalize the EPP. Participants should include the U.S. Fish and Wildlife Service, the State of Hawaii Department of Land and Natural Resources, and the NMFS.

Specific Comments

Table I-1. Land Use Description/Approvals
Page I-23. Approval under Section 7 of the Endangered Species Act is required from the NMFS. This should be so indicated under Federal Government in Table I-1.

Protected Species.

2.3.2 Marine and Aquatic Species
Page IV-51, paragraph 2. Under this section on Existing Conditions the endangered humpback whale (*Megaptera novaeangliae*) should be included with other marine mammals occasionally sighted in nearshore waters off Punalu'u. Although not an important area for this endangered whale, they can be sighted within the 100 fathom isobath at Punalu'u anytime between December through April. The proposed project as described should have no adverse impact on this species.

We look forward to continued cooperation in developing the Punalu'u Resort project. Please contact Mr. John Naughton of my staff for recommended coordination in finalizing the Punalu'u Resort Environmental Protection Plan.

Sincerely yours,

Doyle E. Gates
 Doyle E. Gates
 Administrator

cc: F/SWR, Terminal Is., CA
 F/PR, Washington, D.C.
 FWS, Honolulu
 U.S. Army Corps of Engineers, Honolulu
 EPA, Region 9 (P-5)
 State Div. of Aquatic Resources
 PBR Hawaii (Mr. Thomas S. Witten) ✓

XII - 34



February 5, 1988

U.S. Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
2570 Dole Street
Honolulu, Hawaii 96822-2396

Attention: Doyle E. Gates,
Administrator

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Gates:

This is to acknowledge receipt of your letter of January 19, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 1, 1988

U.S. Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
2570 Dole Street
Honolulu, Hawaii 96822-2396

Attention: Mr. Doyle E. Gates,
Administrator

SUBJECT: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Gates:

Thank you for the copy of your letter of January 19, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject EIS. The following is provided in response to your letter.

General Comments

1. We appreciate your assistance in the preparation of the descriptions of the potential impacts to the endangered hawksbill turtle and threatened green turtle. We are pleased you believe that these resources are described adequately in the Draft EIS. The information will also be included in the Final EIS.
2. We agree that implementation of the Environmental Protection Plan (EPP) is key to assuring the protection of marine resources including threatened and endangered species. Per our discussions with your staff (Messrs. J. Naughton and E. Nitta), C. Brewer Properties, Inc. intends to finalize the EPP at the time Special Management Area (SMA) and Department of Army Corps of Engineers permit applications are prepared for the work that is proposed for the coastal ponds and adjoining areas. Sufficient detail regarding the work to be performed will be available at that time, thereby assuring that the EPP can be specific regarding the environmental protection measures that would be employed during construction activities.



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region • Western Pacific Program Office
2570 Dale St. • Honolulu, Hawaii 96822-2388

Mr. Doyle E. Gates
PUNALU'U RESORT DRAFT EIS
March 1, 1988
Page 2

March 15, 1988 F/SWR1:JJN

Please be assured that C. Brewer Properties, Inc. fully intends to finalize the EPP and appreciates and accepts your offer to assist in the preparation of the Final EPP. We also agree that the U.S. Fish and Wildlife Service and State Department of Land and Natural Resources should be involved with the preparation of the Final EPP. We also intend to involve the County Planning Department in the finalization of the EPP. Your written concurrence with the timing of the Final EPP as stated above would be appreciated.

Mr. Thomas S. Witten
Principal
PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, HI 96813

Dear Mr. Witten:

Subject: Draft EIS for Punalu'u Resort, Ka'u, Hawaii.

Specific Comments

1. Approval under Section 7 of the Endangered Species Act will be included in the list of necessary approvals per your request.
2. The occurrence of the humpback whale in the waters offshore of Punalu'u will be added to the Final EIS per your request.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

The National Marine Fisheries Service (NMFS) has received your letter of March 1, 1988 responding to our comments on the subject Draft EIS for Punalu'u Resort, Ka'u, Hawaii. We offer the following in response to your letter.

As stated in our report of January 19, 1988 in which we comment on the subject Draft EIS, NMFS feels that finalizing the Punalu'u Resort Environmental Protection Plan (EPP) is one of the most important aspects for protection of marine resources, including threatened and endangered species, at the proposed resort project site. We feel that timing for finalizing the EPP must be prior to the initiation of any in-water or coastal construction.

In view of the above, NMFS concurs with your stated intent (under General Comments, paragraph 2 of your March 1, 1988 letter) that "C. Brewer Properties, Inc. intends to finalize the EPP at the time Special Management Area (SMA) and Department of Army Corps of Engineers permit applications are prepared for the work that is proposed for the coastal ponds and adjoining areas". We agree that sufficient detail regarding the proposed work should be available at that time to assure that the EPP will maximize protection of marine resources at the project site.

NMFS appreciates your offer to accept our assistance in the preparation of the Final EPP. Please contact Mr. John Naughton of my staff regarding the task of finalizing the EPP for Punalu'u Resort.

Sincerely,

PBR, HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Sincerely yours,

Doyle E. Gates
Doyle E. Gates
Administrator



XII
-
36

cc: F/SWR, Terminal Is., CA
F/PR, Washington, D.C.
FWS, Honolulu
U.S. Corps of Engineers, Honolulu
EPA, Region 9
State Div. of Aquatic Resources
County of Hawaii (Mr. Albert Lyman)

Dante K. Carpenter
Mayor

RONALD IBARRA
Managing Director



DEPARTMENT OF PARKS & RECREATION
COUNTY OF HAWAII

Patricia G. Engelhard
Director

Ronald Okamura
Deputy Director



January 20, 1988

Mr. Albert Lyman, Director
Planning Department
County of Hawaii
Hilo, HI 96720

Subject: Punalu'u Resort - Environmental Impact Statement

Dear Mr. Lyman:

Comments on the revised EIS are noted below:

1. pg. I-16 Swimming at Whittington and Punalu'u beach parks should not be considered "safe"
The Kamaoa (South Point) site has been returned to the State of Hawaii (Hawaiian Home Lands).
2. pg. IV-206 Same as above.
3. Figure IV-23 Naalehu and Pahala parks should be noted on map.

Thank you for the opportunity to review the report.

Sincerely,

Patricia Engelhard
Patricia Engelhard
Director

PE:GM:ai

✓ cc: Mr. Thomas Witten (PBR-Hawaii)

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

County of Hawaii
Department of Parks & Recreation
25 Aupuni Street
Hilo, Hawaii 96720

Attention: Patricia Engelhard,
Director

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Engelhard:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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PBR HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 2, 1988

Ms. Patricia Engelhard, Director
County of Hawaii Department of
Parks and Recreation
25 Aupuni Street
Hilo, Hawaii 96720

Subject: PUNALU'U RESORT DRAFT EIS

Dear Ms. Engelhard:

Thank you for the copy of your letter of January 20, 1988 to Mr. Albert Lyman, Director, Planning Department regarding the subject project. The following is provided in response to your letter.

1. Chapter I of the Final EIS will include the caution that swimming at Punalu'u and Whittington beach parks is not considered "safe" per your request. Additionally, the Final EIS will note that the Kamaoa (South Point) site has been returned to the Department of Hawaiian Home Lands.

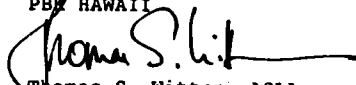
2. The information included in Chapter I as noted above, will also be included in Chapter IV of the Final EIS.

3. Na'alehu and Pahala Parks will be noted on the Ka'u Regional Recreational Facilities Map included in the Final EIS.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

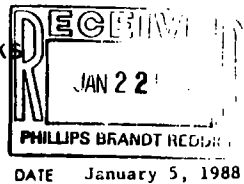
cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402

HONOLULU IRVINE DENVER

DEPARTMENT OF PUBLIC WORKS
COUNTY OF HAWAII
HILO, HAWAII



PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

Memorandum

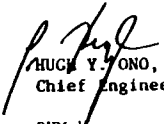
TO : Planning Department

FROM : Chief Engineer

SUBJECT : E.I.S. FOR PUNALU'U RESORT
Applicant: Hawaiiana Investment Co., Inc.
Location : Ka'u, Hawaii
TMK : 9-5-19:11,15,24,33,38
9-6-02:8,37,38,41,45

We have reviewed the subject application(s) and our comments are as follows:

- 1) Building shall conform to all requirements of code and statutes pertaining to building construction.
- 2) Applicant shall be informed that if drywells are included in the subject improvements, Chapter 23, Underground Injection Control (UIC), Administrative Rules, Dept. of Health, prohibit any person from operating, constructing or modifying an injection well (drywell) unless authorized by a permit issued by the Director of Health, State of Hawaii.
- 3) The intersection of the eastern part of Punalu'u Road with the Belt Highway should be included in the Traffic Impact Study. A left-turn storage lane on the Belt Highway should be provided.
- 4) All roads within the development shall be designed for a minimum design speed of 35 mph.
- 5) Provide curbs, gutters and sidewalks for all new and realigned roads.
- 6) A conceptual design plan indicating how storm water will be treated shall be submitted showing proposed improvements and inundation areas. County storm drainage standards shall be used in the determination of runoff quantity. The erosion hazard in the Ninole Stream basin shall be carefully analyzed and mitigated.


HUGH Y. ONO, P.E.
Chief Engineer

DHM:vg

February 5, 1988

County of Hawaii
Department of Public Works
25 Aupuni Street
Hilo, Hawaii 96720

Attention: Hugh Y. Ono, P.E.,
Chief Engineer

SUBJECT: PUNALU'U RESORT DRAFT EIS

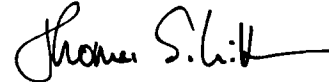
Dear Mr. Ono:

This is to acknowledge receipt of your letter of January 5, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELFACSIMILE: (808) 523-1402

HONOLULU IRVINE DENVER

Mr. Hugh Y. Ono
PUNALU'U RESORT DRAFT EIS
March 2, 1988
Page 2

March 2, 1988

County of Hawaii
Department of Public Works
25 Aupuni Street
Hilo, Hawaii 96720

Attention: Mr. Hugh Y. Ono, P.E.,
Chief Engineer

SUBJECT: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Ono:

The following is provided in response to your Memorandum of January 5, 1988 to the County Planning Department regarding the subject Draft EIS.

1. All Resort buildings will be designed and constructed in accordance with all applicable state and county building codes and standards. The preceding will be stated clearly in the Final EIS.
2. Drywells are not planned for the Resort at this time. Should this condition change in the future, those wells would conform to all applicable Department of Health rules and regulations.
3. The traffic study included in the Draft EIS will be revised to include ingress/egress from the eastern part of Punalu'u Road in addition to the presently analyzed traffic patterns. In addition, the revised analysis will include traffic estimated to be generated by the proposed Hawaiian Riviera Resort and a possible space launch facility located in Ka'u. With regard to the latter, our analysis will include a site west of Punalu'u and a site east of Punalu'u to assure that all potential traffic generators are considered in the Final EIS. The analyses will evaluate the need and timing of acceleration/deceleration and left/right turn lanes.

4. As presently planned, fundamental to the concept of the Resort is a pedestrian oriented, human scale development in which vehicular traffic would be discouraged to the greatest extent possible and practical. Although detailed planning and design of internal roadways and streets has not been completed, we presently contemplate a maximum 15 mile per hour speed limit that would be controlled and enforced by Resort security forces and street signage, including stop signs. As planning and design activities progress, we will continue to work with your department regarding roadway and street design standards applicable to the proposed project and the unhurried, pedestrian feeling that we are trying to achieve. It appears that the issues of safety, efficient traffic flow and liability are more productively discussed based on and following the detailed design phase of the project, rather than during the present general planning phase. Additionally, under present planning, internal roadways and streets would not be dedicated to the county, but would remain private.

At present, it is our belief that designing the internal Resort roadways to a 35 mile per hour speed limit would create both unsafe traffic conditions within the Resort and an environment inconsistent with the project objectives.

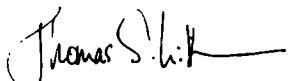
5. Under present conceptual planning, curbs and gutters would be provided where appropriate. The necessary county approvals for the construction will be obtained at the appropriate time. Also, at that time the surface drainage issues will be addressed with the idea of limiting curbs and gutters to the extent possible while maintaining proper surface drainage patterns. Sidewalks will be provided as required for safety and to enhance the pedestrian ambience that will be created throughout the Resort.
6. A conceptual design plan and report indicating how storm water will be controlled will be submitted as part of the construction drawings that will be submitted to the county as part of the development construction approval and permitting process. A drainage study has been completed and included in the Draft EIS (see Appendix E). The study has considered the erosion hazard in the Ninole Stream basin. This study will be added to as necessary to include a drainage plan drawing in the Final EIS.

Mr. Hugh Y. Ono
PUNALU'U RESORT DRAFT EIS
March 2, 1988
Page 3

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

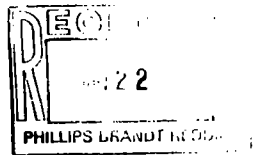
PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

40 Pele Hanoa
P.O. Box 472
Naalehu, Hawaii
96772



PBR
HAWAII LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Mr. Albert L. Lyman
Planning Director
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

January 11, 1988

Dear Mr. Lyman:

We would like to inform you that, the parcel C. Brewer has planned for realignment mauka of Punalu'u road and the construction of the two new access roads to the new proposed pavilion site, belongs to the Bangay Estate.

The Estate have filed claim.

Bangay Estate
c/o Pele Hanoa
P.O. Box 472
Naalehu, Hawaii 96772

Attention: Bangay Estate

SUBJECT: PUNALU'U RESORT DRAFT EIS

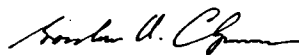
Gentlemen:

This is to acknowledge receipt of your letter of January 11, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII


For Thomas S. Witten, ASLA
Principal

Sincerely,
The Bangay Estate

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

KOBAYASHI, WATANABE, SUGITA, KAWASHIMA & GODA

ATTORNEYS AT LAW
HAWAII TOWER, 8th FLOOR
745 FORT STREET
HONOLULU, HAWAII 96813-3889
TELEPHONE (808) 544-8300

OF COUNSEL
George R. Ariyoshi
Bert T. Kobayashi, Sr.
Russell K. Kono

Facsimile (808) 544-8389
Telex 6502396585 MCI
MCI Mail 2386585
ABA/Net ABA2281

March 22, 1988

Kevin S. C. Chang*
Alan M. Goda*
J. Douglas Ing*
James Kawashima*
Bert T. Kobayashi, Jr.*
John T. Kamehaha*
Wray H. Kooze*
Benjamin A. Kudo*
Dale W. Lee*

Ronald Y. K. Leung*
Kenneth Y. Sugita*
Robert T. Takematsu*
Lynn Y. Wakatsuki*
Jeffrey N. Watanabe*
Cynthia Winiger*
Gary G. N. Wong*
Randall Y. Yamamoto*

*A Law Corporation

Jan M. L. Y. Ahi
Ferdinand G. Aranza
Kale Feloman
Wendell N. Fuji
Lyle Y. Harada
Lyle S. Hosoda
Robert K. Ichikawa

Cheryl K. Kakazu
Donna Y. Kanemaru
Pamela J. Larson
Michael A. Lorusso
David I. Moriarty
Lex R. Smith

Bangay Estate
c/o Pele Hanoa
P.O. Box 472
Naalehu, Hawaii 96772

Re: Punalu'u Resort Draft EIS

To Whom It May Concern:

The following has been prepared by legal counsel to C. Brewer Properties, Inc. in response to the unsigned letter dated January 11, 1988 from the Bangay Estate to Mr. Albert Lyman, Director of the County of Hawaii Planning Department.

As of the date of this response, C. Brewer Properties, Inc. has been working with the attorneys of the Bangay Estate to clarify the existence, nature and scope of a claim by the Bangay Estate regarding the real property proposed for development as part of the Punalu'u Resort project.

The Bangay Estate's letter and this response will be included in the Final EIS for Punalu'u Resort.

Very truly yours,

KOBAYASHI, WATANABE, SUGITA,
KAWASHIMA & GODA

By BENJAMIN A. KUDO
BENJAMIN A. KUDO

cc: Mr. Albert Lono Lyman, Director
County of Hawaii Planning Department
Mr. B.G. Moynahan, Sr. V.P.
C. Brewer Properties, Inc.
✓ Mr. Thomas Witten
Phillips, Brandt & Reddick
Livia Wang, Esq.
Native Hawaiian Legal Corporation

XII - 44



MOKUAIKAUA CHURCH

CHURCH OF THE CHIMES

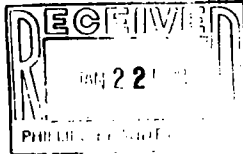
Established 1820

P. O. Box 1447 KAILUA-KONA, HAWAII 96740

Minister
HENRY K. BOSCHARD
P. A. M. D. D. M.

Mokuaikaua Church, Hawaii
PHONE 324 1589

January 12, 1988



PBR HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

Mokuaikaua Church
P.O. Box 1447
Kailua-Kona, Hawaii 96740

Attention: Henry K. Boshard

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Boshard:

This is to acknowledge receipt of your letter of January 12, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Mr. Albert Lono Lyman
Director of Planning
County of Hawaii
25 Aupuni
Hilo, HI 96720

Dear Mr. Lyman:

Word has reached me through families and friends in Kau and in regards to the new EIS covering of the resort development at Punaluu and Ninole. We are still very much concerned about the C. Brewer development's intrusion into the integrity of the old church and cemetery site on the bluff overlooking Punaluu Bay. Would it be possible for you and the planning department to insist that whatever is built is that area will provide a 500' setback from the church and cemetery? Then too, even though their new plans will not include the old road approach to the old church and cemetery site, it will seem that the new roadway system will preclude its future use. Therefore, we ask that the access road not be blocked in any way.

Let me say that to all of us who were raised in that area and have been a part of the church's life and ministry for many years, that the church and cemetery are still being actively used. Whatever is planned for the area should have due consideration for us, and not just dismiss us into oblivion, just because C. Brewer owns the bulk of the land in that area. In other words, we need some help from our county officials by reasonably protecting some of the beauty and distinctive environmental and cultural locations. Please remember that most of the people in Kau make use of Punaluu Beach and regard the area's history and culture with much aloha.

Thank you very much.

Sincerely,

HENRY K. BOSCHARD

cc: Hawaii County Council

HKB:lb

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE (808) 521-3631 TELECOPIER (808) 521-1402

HONOLULU IRVINE DENVER

March 18, 1988

Mokuaikaua Church
P.O. Box 1447
Kailua-Kona, Hawaii 96740

Attention: Mr. Henry K. Boshard

Subject: PUNALU'U RESORT DRAFT EIS

Dear Mr. Boshard:

The following is provided in response to your letter of January 12, 1988 to Mr. Albert Lono Lyman regarding the subject Draft EIS.

C. Brewer Properties, Inc. has been working with the owners (Hawaii Conference Foundation) of the chapel (Henry Opukaha'ia Memorial Chapel and Cemetery) regarding access, ambience, infrastructure connections and other factors affecting the church and cemetery. As of this date these elements of the proposed project and their effect on the church and cemetery have been tentatively resolved to the mutual agreement of both parties and a formal agreement is being prepared.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

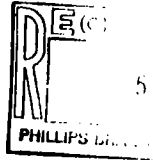
Sincerely,

PBR, HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

EK: A K. Ledman
224 KAHAMANA DRIVE
HILO, HAWAII 96720



January 22, 1988

Mr. Thomas Witten, ASLA
PBR Hawaii
130 Merchant Street, Suite 1111
Honolulu, Hawaii 96813

SUBJECT: PUNALU'U RESORT

Dear Mr. Thomas Witten:

I submit this letter in hopes that the concerns which I have will be reviewed and consideration be given on my behalf. The area that involve the Punalu'u Bay has significant historical values to my family, relatives and friends because it needs to be preserved without any built-up development.

C. Brewer Properties, Inc. planned-development requires an occupancy which I feel is premature at this time simply because such a massive development requires a climate and environment similar to the Kona Coast. May I reflect the Waiakea Village Resort as an example of C. Brewer's failures.

I believe that such a development will create much adversities, rather than help the people of this community. A point of illustration is that to encourage employment, possibly housing for the people may be very temporal since no guarantee will be given to the people. Will C. Brewer fulfill their needs after another failure? I say that they won't!

What I am seeking is the Hawaii County Planning office deny such a development simply because it would restrict our cultural practices, limited use of the ocean as well as the shoreline areas. Within this area we as residents would not be free to gather seafood and other materials that we use to accomodate our lifestyle. I feel that this development will destroy the environment through pollution of sewage disposal and contaminated chemicals that would be used for ground maintenance.

I am saying that this proposal development will eventually destroy those priceless historical values of the Ili'ili Hanau O Koloa (Pebbles that give birth), Ka'ie'ie (Fishing Heiau), Kauwali and Puhau (fresh-water ponds) which can never be replaced.

Page 2
Witten

The present area does provide a restaurant, condominiums, a convenient store, golf course which is sufficient for the public and for the future as well.

In closing, I ask that the Hawaii County Planning Department deny this proposed development.

Sincerely,

Elsa Kalanikauleleiaawi Dedman

cc: County of Hawaii Planning Department

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February 5, 1988

Elsa K. Dedman
224 Kaumana Drive
Hilo, Hawaii 96720

Attention: Elsa K. Dedman

SUBJECT: PUNALU'U RESORT DRAFT EIS

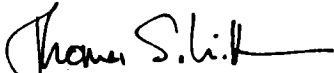
Dear Ms. Dedman:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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March 3, 1988

Ms. Elsa K. Dedman
224 Kaumana Drive
Hilo, Hawaii 96720

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Dedman:

Thank you for your letter of January 22, 1988 regarding the subject Draft EIS. The following is provided in response to your letter.

We agree that the Punalu'u area has significant historical and cultural values to the State of Hawaii and C. Brewer Properties, Inc. has conducted numerous archaeological surveys including an archaeological reconnaissance survey of the entire project area to locate and identify significant archaeological sites (see Appendix A of Draft EIS). C. Brewer Properties, Inc. has also had a Draft Outline Cultural Resources Management Plan prepared to provide the framework for the protection and preservation of those significant sites in accordance with the consulting archaeologist's recommendations and applicable federal, state and county rules and regulations. C. Brewer Properties, Inc. believes that these sites are important features of the region that should be preserved for the benefit of residents and visitors to the area.

The marketing study conducted for the proposed project (see Chapter II, Section 3.4 of Draft EIS) indicates that the proposed Resort facilities would be economically viable and absorbed into the local market during the projected development period. As indicated in the Draft EIS (see Chapter I, Section 5.10 and Chapter IV, Section 4.3), C. Brewer Properties, Inc. "... will continue to work with appropriate state and county agencies such that appropriate housing requirements are properly addressed and met, and the possibility, if a demonstrated need is shown, of establishing an employee shuttle bus system and child care centers". As part of C. Brewer Properties, Inc. efforts to

Ms. Elsa K. Dedman
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

improve the benefits of the proposed project to the people of Ka'u, a Draft Punalu'u Resort Planning Process for a Program to Maximize Ka'u Resident Employment and Economic Benefits document (Appendix I) was included in the Draft EIS. C. Brewer Properties, Inc. is committed to the implementation of this plan when appropriate.

Access to all coastal fishing, swimming and food gathering areas are an integral part of and will be provided by the proposed project. Vehicular access will continue to be provided to the boat launch ramp and a new vehicular access road and parking area would be constructed east of Ninole Cove to provide access to the shoreline areas on the west side of the project area. Present cultural practices would also be continued by the proposed project. Based on the marine surveys, water sample analyses, current studies and literature searches performed for the proposed project, scientific evidence to suggest that the present Resort operations or future operations would cause significant adverse impacts or cause the coastal ponds, nearshore waters or offshore waters of Punalu'u to become polluted does not exist.

As noted above, the significant historical and cultural resources of the area and the coastal ponds would be preserved and protected by plans for the proposed project.

The economic viability of the proposed project has been confirmed by the marketing and economic analyses conducted for the project. The proposed project will provide additional needed economic and job opportunities to the people of Ka'u.

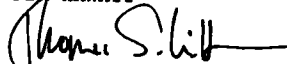
As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Ms. Elsa K. Dedman
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 3

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBH HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

XII
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49

Box 641
Honolulu, HI. 96809
January 22, 1988

RECEIVED
75
copy for your
information
EN

Mr. Albert L. Lyman, Director
County of Hawaii Planning Dept.
25 Aupuni St.
Hilo, HI. 96720

Dear Mr. Lyman:

SUBJECT: Draft EIS, Punalu'u Resort, Ka'u, Hawaii

A lot of work went into producing this Draft EIS. Too bad the copy I have to look at is missing pages.

I recommend against approval of this project. The coastal area between Ninole Pond and Punalu'u black sand beach should be reserved, zoned, and developed for public use. The small area proposed for public use in this plan is inadequate. The quality of recreation to be enjoyed by the residents of the resort, visitors (tourists), and the rest of us could be much better. We should accept nothing but the best possible plan for this area, which is certainly one of the most beautiful in Hawaii. Ninole Pond should be restored to its former life and beauty. With proper landscaping, this coastal area could continue to be sought out as a prime location for the movie industry. Any construction in the coastal area should be Hawaiian style.

The ancient and historic Hawaiian sites along this coast are going to be impacted by this project. It is very important that these sites be documented and studied now, and that they be placed on the Hawaii Register of Historic Places. There should be a commitment from the State of Hawaii and the Bishop Estate and C. Brewer Properties, in the form of a signed agreement, to do something about the management of the sites in adjoining lands. There should be a commitment for maintenance and interpretive signs and for placing sites on the Hawaii Register. This should be the responsibility of the respective landowners, not just the developer. The reason we have a State Historic Preservation Program is to take care of matters like this.

This is yet another case where the archaeology report in the Appendix is reduced and poorly reproduced. I note that only two reviewers commented on the archaeological sites, DLNR and DEQC. I recommend that the specialized studies included in the appendix be bound separately and only sent to those reviewers who are interested and the public libraries. As an archaeologist, these archaeology reports have continued reference value for me. It should be possible for any interested archaeologist to receive a standard size copy of the report, with clear illustrations and photographs and full size maps that are easy to read and use. Otherwise, I don't believe the mitigation measures proposed are adequate. The archaeological report and its distribution are just as important as the fieldwork.

I'm interested in receiving the remaining archaeological reports that will result from this project. This plan only provides for sending future reports to DLNR and Hawaii County.

Sincerely,

Earl Neller
Earl Neller

February 5, 1988

Earl Neller
P.O. Box 641
Honolulu, Hawaii 96809

Attention: Earl Neller

SUBJECT: PUNALU'U RESORT DRAFT EIS

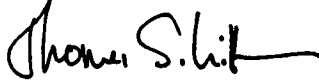
Dear Mr. Neller:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 3, 1988

Mr. Earl Neller
P.O. Box 641
Honolulu, Hawaii 96809

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Neller:

The following is provided in response to your letter of January 22, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject Draft EIS.

We apologize for the inconvenience missing pages in your copy of the Draft EIS. The Final EIS will be carefully checked to ensure that all pages are included in all copies.

The coastal area between Ninole Cove and Punalu'u black sand beach is within the Conservation designated lands that would be retained by the plans for the proposed project. Through agreement between the State Department of Land and Natural Resources and C. Brewer Properties, Inc., access to these areas will be maintained. Based on studies conducted for the proposed project, the planned enlargement of the public beach park is sufficient to handle forecast increased use of the park by residents of the area and visitors to the Resort. We agree that the Punalu'u area is one of the most beautiful in Hawaii, a factor that will be preserved and thereby contribute to the economic viability of the proposed project. Coastal area construction will take into account the location, intended uses and feeling of the area.

With regard to the restoration of Ninole Cove, the restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the complex and costly permitting requirements; and the property is under the ownership of the State and, therefore, conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the

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Mr. Earl Neller
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered their assistance to the State Department of Land and Natural Resources and other agencies that may be interested in the restoration of the cove.

We agree that the archaeological and historical sites within the project property require location, identification and preservation in accordance with applicable federal, state and county rules and regulations. A complete Archaeological reconnaissance survey of the entire project area has been performed (see Appendix A to the Draft EIS) and a Draft Outline Cultural Resources Management Plan prepared (see Appendix K). Placement of features on the Hawaii Register of Historic Places is outside the control of C. Brewer Properties, Inc. C. Brewer Properties, Inc. has been working with the state and Bishop Estate regarding adjoining sites and will continue to do so. At present, neither organization has any plans for sites located on their property. Should this situation change in the future, their plans would be incorporated into the management of the cultural resources found within the Resort property.

As noted in the Draft EIS (see Appendix K, Interpretive Program Considerations), appropriate signage would be employed to identify and explain significant sites.

In accordance with applicable EIS rules and regulations, all archaeological survey and cultural resources preservation programs and planning has and will continue to be coordinated with the State Department of Land and Natural Resources Historic Sites Section and the County Planning Department. Copies of pertinent reports are available from these agencies. The mitigation measures described in the Draft EIS (Chapter IV, Section 3.2.3) have been determined by the State Department of Land and Natural Resources Historic Sites Section to be acceptable.

The Final EIS and reports appended thereto will be distributed in accordance with applicable EIS rules and regulations. We suggest that you contact the Office of Environmental Quality Control for copies of reports in which you may have an interest.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental

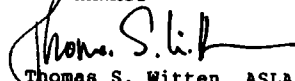
Mr. Earl Neller
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 3

impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBB HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

XII
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52



STATE OF HAWAII
 OFFICE OF HAWAIIAN AFFAIRS
 1600 KAPIOLANI BLVD., SUITE 1500
 HONOLULU, HAWAII 96814
 (808) 548-8800
 (808) 546-2642

DEC 30 1987
 COPY
 PHILLIPS

January 21, 1988

Mr. Albert L. Lyman, Director
 County of Hawaii Planning Dept.
 25 Aupuni St.
 Hilo, HI. 96720

Dear Mr. Lyman:

SUBJECT: Draft EIS, Punalu'u Resort, Ka'u, Hawaii

As with the previous EIS for the Punalu'u Resort project, we continue to find this draft EIS to be well conceived, well written and comprehensive in scope, and our office appreciates the effort and expense that has gone into producing this document.

Our previous opposition to the project, however, was based primarily on the land use proposed for the coastal areas adjacent to the county park and Ninole Pond. This proposal is not substantially different from the previous one. Building a major hotel and golf holes in this area, while increasing the local population by some 3,000 people, is not appropriate use of this land which is a favorite natural area for public access to the coast. Plans for expansion of the county park by a few acres does not sufficiently ameliorate this problem. The proposal increases the public use pressure to private lands and State lands, including the private residences on the beach (currently destroyed, but subject to use at some time in the future), the cemetery, and the adjoining archaeological sites which are still in fair condition (and not a part of the archaeological studies included in this document)

Public use of the coastal areas at Punalu'u should be preserved and enhanced. We support the use of public funds to achieve this goal. The Punalu'u Resort proposal is unacceptable. There should be no major hotels or golf courses on the coast.

Sincerely,

Kamaki A. Kanahale III

Mr. Kamaki A. Kanahale III
 Administrator

PBR
 HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
 Office of Hawaiian Affairs
 1600 Kapiolani Boulevard, Suite 1500
 Honolulu, Hawaii 96814

Attention: Kamaki A. Kanahale III,
 Administrator

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Kanahale:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
 Principal

cc: Mr. A. L. Lyman, Planning Director,
 County of Hawaii
 Mr. B. G. Moynahan, Senior Vice President,
 C. Brewer Properties, Inc.

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Mr. Kamaki A. Kanaha III
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

March 3, 1988

State of Hawaii
Office of Hawaiian Affairs
1600 Kapiolani Blvd., Suite 1500
Honolulu, Hawaii 96814

Attention: Mr. Kamaki A. Kanaha III,
Administrator

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Kanaha:

The following is in response to your letter of January 21, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject project.

Thank you for your comments regarding the comprehensiveness of the Draft EIS. As noted in your letter, a considerable amount of time did go into the preparation of the document in our efforts to fully describe and disclose the potential environmental impacts of the proposed project.

As described in the Draft EIS (see Chapter II, Section 2) the area of the resort in which development would take place is presently classified as Urban under the State Land Use designation. In addition, the resort area is presently designated as a Minor Resort area under the County General Plan and partially zoned to allow the completion of the development of the resort. The County General Plan amendment currently being sought would revise the presently allowed density (Low Density and Medium Density) of some parcels within the resort that are mauka of the Hawaii Belt Highway, while others would revert to Open Space. Land areas makai (along the shoreline) of the proposed resort facilities are classified as Conservation lands under the State Land Use designation and would remain as Conservation lands.

We also note that, in recognition of the sensitivity of the coastal area, the hotel previously planned for the coastal area has been relocated to the bluff above the coastal strand. This

relocation, as well as other modifications to the Resort Master Plan, result in a project that is substantially different from the originally proposed plan.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Pedestrian and vehicular access to the coastal resources of the area would be enhanced by the proposed project via improvements to the roadways and increasing the public beach park and parking areas. Through agreement with the owners (Hawaii Conference Foundation) of the church and cemetery (Henry Opukaha'ia Memorial Chapel and Cemetery) and implementation of the Cultural Resources Management Plan and Environmental Protection Plan (Appendices K and H respectively in the Draft EIS), access to the church and cemetery would be maintained. Also, the significant historical, cultural and natural environmental resources of the resort area will be protected and preserved in keeping with C. Brewer Properties, Inc. commitment to these resources based on its own archaeological consultant's recommendations and, at a minimum, as required by federal, state and county rules and regulations.

As noted above, use of the coastal areas at Punalu'u would be preserved and enhanced for all residents of and visitors to the area. The costs for the improvements that are planned for the roadways, parking areas and beach park will be borne by the land owner. The conceptual plans for the revised Resort Master Plan, include hotel development on the bluff overlooking the ocean and not on the lower coastal area. The golf holes proposed for the lower coastal area will serve to provide habitat for the wildlife frequenting the resort area and would not hinder or restrict pedestrian access to coastal fishing, swimming and/or food gathering locations except those that are currently practiced in Pond No.1. Continued public access to coastal resources has been agreed to by the land owner and the State Department of Land and Natural Resources via a series of public access easements (see Draft EIS, Chapter IV, Section 5.1.3.2).

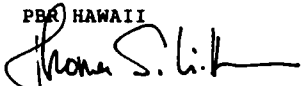
XII - 54

Mr. Kamaki A. Kanahale III
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 3

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be included in the Final EIS.

Sincerely,

PBR HAWAII

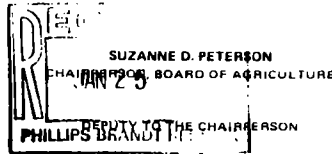


Thomas S. Witten, ASLA

Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

JOHN WAIHEE
GOVERNOR



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

Mailing Address:
P. O. Box 22159
Honolulu, Hawaii 96822-0159

January 21, 1988

PBR
HAWAII
LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
Department of Agriculture
P.O. Box 22159
Honolulu, Hawaii 96822-0159

Attention: Ms. Suzanne D. Peterson,
Chairperson, Board of Agriculture

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Peterson:

This is to acknowledge receipt of your letter of January 21, 1988 regarding the subject project. Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

MEMORANDUM

To: Mr. A. Lono Lyman, Director
Planning Department
County of Hawaii

Subject: Draft Environmental Impact Statement (DEIS) for
Punalu'u Resort
C. Brewer Properties, Inc.
Punalu'u, Ka'u, Hawaii
TMK: 9-5-19: 11, 15, 24, 26, 30, 31, 33, 35
9-6-01: 1, 2, 3, 6, 11, 12, 13
9-6-02: 8, 37, 38, 41, 45
Area: 433 acres

The Department of Agriculture has reviewed the subject DEIS and has no further comments to offer.

Thank you for the opportunity to comment.

SUZANNE D. PETERSON
Chairperson, Board of Agriculture

cc: Mr. Thomas S. Witten, PBR-Hawaii ✓
OEQC

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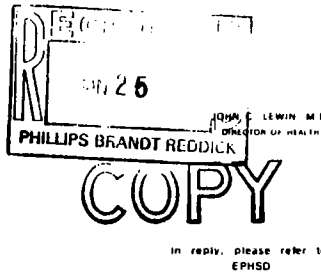
FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813
TELEPHONE (808) 521-5600 TELECOPIER (808) 521-1102
HONOLULU BRVNS DENVER

JOHN WAIHEE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96801

January 19, 1988



PBR
HAWAII LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Attention: Bruce S. Anderson, Ph.D.

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Dr. Anderson:

This is to acknowledge receipt of your letter of January 19, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

MEMORANDUM

To: Mr. Albert Lono Lyman, Director
Planning Department, County of Hawaii

From: Deputy Director for Environmental Health

Subject: Draft Environmental Impact Statement (DEIS) for Proposed Punalu'u Resort,
Punalu'u, Ka'u District, Hawaii

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

Air Pollution

The DEIS refers to Jim Morrow's (1986 and 1987) air quality analyses performed for other proposed Big Island resorts, including the Hawaiian Riviera project, in determining air quality impact from vehicular generated emissions. Mr. Morrow's analyses should be provided in the appendices.

Water Pollution

The DEIS indicates that the golf course will be irrigated with treated wastewater. Since the areas along the golf course are designated for resort and residential use, specific planning strategies should be established to ensure the health and safety of residents and users of the facilities.

BRUCE S. ANDERSON, Ph.D.

cc: Mr. Thomas S. Witten ✓
Chief Sanitarian, Hawaii

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Dr. Bruce S. Anderson, Ph.D.
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

March 3, 1988

State of Hawaii
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Attention: Dr. Bruce S. Anderson, Ph.D.,
Deputy Director

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Dr. Anderson:

Thank you for the copy of your Memorandum of January 19, 1988 to Mr. Albert Lono Lyman, Director, Planning Department, County of Hawaii regarding the subject Draft EIS. The following is provided in response to your memorandum.

Air Pollution

In accordance with accepted scientific citation methods and EIS rules and regulations, the air quality analyses performed by Mr. James Morrow for other Big Island resort projects, will be properly cited in the References section of the Final EIS and appropriate tables and/or figures with proper source citations included in the Final EIS.

Water Pollution

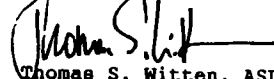
The Environmental Protection Plan included in the Draft EIS and to be included in the Final EIS, has been designed to provide specific planning strategies and the level of protection required to maintain the health and safety of residents and users of the facilities as well as the terrestrial and marine resources of the coastal area. By agreement with the U.S. National Marine Fisheries Service and C. Brewer Properties, Inc., the Final Environmental Protection Plan will be prepared at the time Special Management Area (SMA) and Department of Army Corps of Engineers permits are prepared. This timing will allow the Plan to specifically address construction activities and mitigation of possible adverse environmental impacts that might result from

those activities. The Final Environmental Protection Plan will be prepared in consultation with The National Marine Fisheries Service, U.S. Fish and Wildlife Service, Department of Land and Natural Resources and County Planning Department.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be included in the Final EIS.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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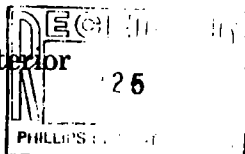


United States Department of the Interior

GEOLOGICAL SURVEY

WATER RESOURCES DIVISION
P.O. Box 50166
Honolulu, Hawaii 96850

January 20, 1988



PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

United States Department of the Interior
Water Resources Division
P.O. Box 50166
Honolulu, Hawaii 96850

Attention: Mr. William Meyer,
District Chief

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Meyer:

This is to acknowledge receipt of your letter of January 20, 1988 regarding the subject project. Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Mr. Albert L. Lyman, Director
County of Hawaii Planning Dept.
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Subject: Punalu'u Resort, Punalu'u Ka'u District, Hawaii

The Hawaii District Office of the U.S. Geological Survey, Water Resources Division, has reviewed the subject Environmental Impact Statement. The Survey has no comment on the report at this time.

Thank you for allowing us to review the subject report and we are returning the report for your further use.

Sincerely,

William Meyer
District Chief

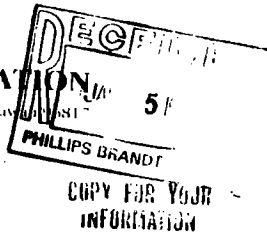
Enclosure

cc: Mr. Thomas S. Witten, PBR-Hawaii, 130 Merchant St., Suite 1111, Honolulu, HI, 96813

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HAWAII CONFERENCE FOUNDATION

Telephone 537-9516 • 15 Craigside Place • Honolulu, Hawaii 96817



PBR HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

22 January 1988

Mr. Albert L. Lyman, Director
County of Hawaii Planning Dept.
25 Aupuni St.
Hilo, HI 96720

Subject: Punaluu Resort, Draft Environmental Impact Statement, December 1987

Dear Mr. Lyman:

As fee owner of the small .35 acre parcel of land (TMK: Hawaii 9-5-19:14), we are naturally interested in what goes on around our small Opukaha'ia Chapel. Our interest centers on three specific areas: access, ambience and infrastructure.

1. Access. Historically, for more than 100 years, our access has been over and across former Bishop Estate (now C. Brewer Properties, or CBP) lands. These lands are proposed for use as a golf course. Our interest is to insure appropriate and permanent access. (We have been in recent conversation with CBP on this matter, and will discuss it further during a meeting projected for 2 February 1988).

2. Ambience. The Opukaha'ia Chapel has been quite secluded for all of its life. We are interested in seeing that this feeling of seclusion is not lost. (We are planning to discuss this matter at the projected 2 February 1988 meeting with CBP).

3. Infrastructure. CBP will have electricity, water, and some form of sewer facilities. We are interested in the possibility of having the Opukaha'ia Chapel participate in using these, and will discuss this matter at the projected 2 February 1988 meeting with CBP.

Thank you for providing this opportunity to comment.

Very truly yours,

James A. Richards
James A. Richards
Executive Secretary

JAR:dc

cc: CBP
PBR-Hawaii

This Foundation is the property management arm of the Hawaii Conference of the United Church of Christ, continuing the first Christian work started in Hawaii in 1820

February 5, 1988

Hawaii Conference Foundation
15 Craigside Place
Honolulu, Hawaii 96817

Attention: James A. Richards,
Executive Secretary

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Richards:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten
Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 100 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813
TELEPHONE (808) 521-5601 TELECOPIER (808) 523-1102
HONOLULU IRVINE DENVER

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PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

March 18, 1988

Hawaii Conference Foundation
15 Craigsid e Place
Honolulu, Hawaii 96817

Attention: Mr. James A. Richards,
Executive Secretary

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Richards:

Thank you for the copy of your letter of January 22, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject Draft EIS. The following is provided in response to your letter.

It is our understanding that, as a result of the meetings between representatives of your organization and C. Brewer Properties, Inc., agreement between your organization and C. Brewer Properties, Inc. has been reached on methods satisfactory to you to resolve the issues of pedestrian access, ambience and infrastructure relative to the Henry Opukaha'ia Memorial Chapel and Cemetery on the grounds of the Hoku loa Church at Punalu'u, Ka'u, Hawaii.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be included in the Final EIS.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE (808) 521-5631 TELECOPIER (808) 523-1102

HONOLULU IRVINE DENVER

GLEN M. WINTERBOTTOM

Kau Homesteader.

Following in the
Footsteps of
Henry David Thoreau,
(1817-1862).



No. 27 Poha Street.
Mailing Address:
Post Office Box W.

Naalehu, Kau, H. I. January 20, 1988
[96772] H. S. America

Hawaii County Council
Committee on Planning
County Bldg., 25 Aupuni St.
Hilo, Hawaii 96720

Reference: Punaluu Resort DEIS

Dear Committee on Planning:-

Please find enclosed a copy of A Common-sense Look At The Draft Environmental Impact Statement For Punaluu Resort, which highlights in an easy-to-read, non-technical format some of the major concerns surrounding this controversial project.

Also enclosed are two 8" x 10" color photographs of Punaluu's magnificent, and as yet unspoiled, mauka views.

Hoping that my Common-sense Look may be of some small assistance to you as an introduction to, and overview of, the aforementioned massive impact statement, I remain

Yours Respectfully,

Glen M. Winterbottom

GLEN M. WINTERBOTTOM

Copies of this correspondence sent to:
Hawaii County Planning Department
State Representative Andrew C. Levin
Hawaii Tribune-Herald
West Hawaii Today
The Honolulu Advertiser
PBR-Hawaii

"The greatest fine art of the future will be the making of a comfortable living from a small piece of land." - ABRAHAM LINCOLN

OFFICE OF
GLEN M. WINTERBOTTOM

Kau Homesteader.

Following in the
Footsteps of
Henry David Thoreau,
(1817-1862).



No. 27 Poha Street.
Mailing Address:
Post Office Box W.

Naalehu, Kau, H. I. 1988
[96772] H. S. America

A COMMON-SENSE LOOK AT THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PUNALUU RESORT

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"The greatest fine art of the future will be the making of a comfortable living from a small piece of land." - ABRAHAM LINCOLN

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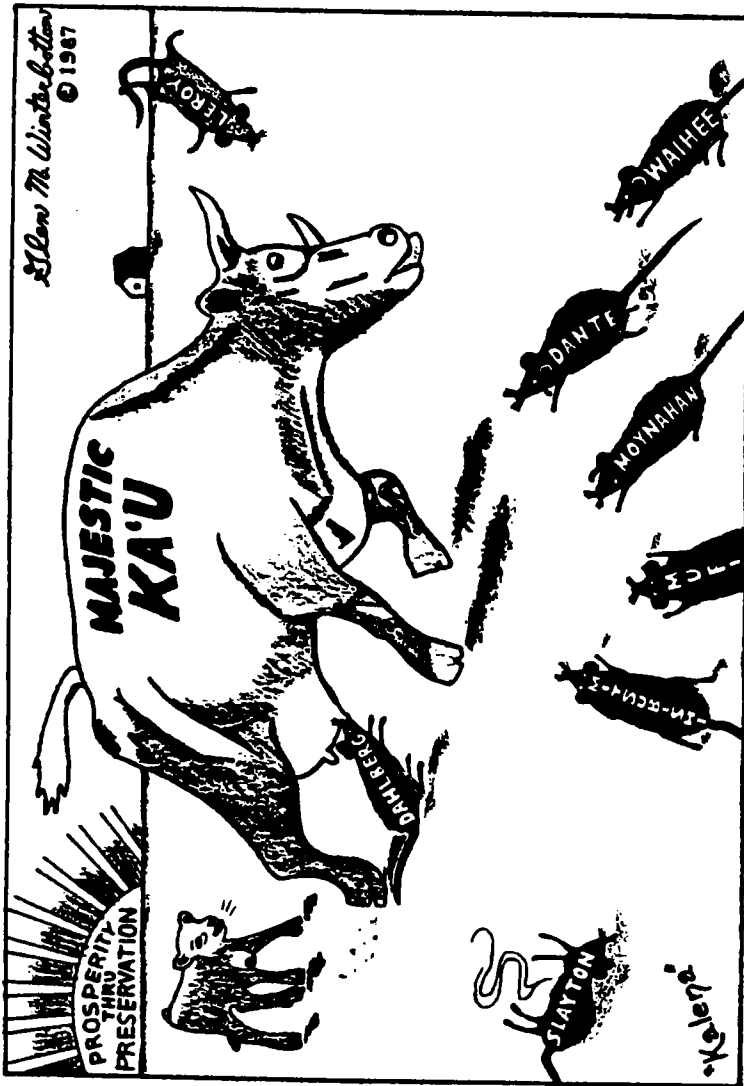
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Milking This District Won't Be Easy!



-FRONTISPIECE-

I.
INTRODUCTION

The matter before the Planning Department, County of Hawaii, is a request by C. Brewer Properties, Inc. (hereinafter "Developer") for a General Plan amendment, Special Management Area use permit and zoning changes, to allow expansion of it's Punaluu Resort, located in the District of Ka'u, Island of Hawaii.

Existing facilities at the subject resort, begun by the Developer in 1972 and previously known as SeaMountain at Punaluu, include an 18-hole golf course and clubhouse, four tennis courts with a convenience store, Punaluu Black Sand Restaurant, a meeting facility, 76 condominium units, a 19-lot single-family subdivision^{1/}, and infrastructure consisting of roads, a water and sewerage system, etc.

Draft and Final Environmental Impact Statements were prepared and submitted for Punaluu Resort in October 1986 and January 1987, respectively. However, due to issues raised prior to acceptance of the Final Impact Statement by the county Planning Department, the Developer withdrew said document from consideration. Subsequently, a revised Draft Environmental Impact Statement (hereinafter "DEIS") was submitted on December 7, 1987.

The following comments and recommendations are based on simple common-sense, as well as experience gained as a result of my diverse employment or self-employment in the State of Hawaii as a newsboy, golf cart boy, state Quarantine animal caretaker, estate custodian, commercial artist, architectural draftsman, scrap-

^{1/} To date, only three homes have been built in said subdivision.

yard laborer, security guard, night courier, roofer, ranch hand, greenskeeper, carpenter, truckdriver, dairy cowboy and milker, agricultural research worker and homesteader.

Although I have lived in the District of Ka'u for only nine years, I am a fourth-generation resident of the Hawaiian Islands, my great-grandparents having emigrated to Oahu from Spain in the monarchy era. My grandfather, Lee Austin, was the founder and longtime proprietor of Honolulu Sporting Goods (now Honsport).

II. VISUAL CHARACTER AND COMPATIBILITY OF PROPOSED RESORT

Punalu'u is gently nestled in natural surroundings. It's surroundings are undisturbed and serene. Gentle, swaying coconut trees line the black sand beach, and crystal blue water pounds rhythmically at the shore. The quiet and serenity is what makes it all so beautiful. It has a natural beauty that many beaches have lost.

Marvine Mercado, winner of Punaluu Resort's Punalu'u Essay Contest^{2/}

A. EXISTING CONDITIONS

Although the Developer's so-called "improvements" to Punaluu/Ninole have resulted in some damage thereto, the area, especially along the shoreline, is still relatively serene and unspoiled. The spectacular views from the coastal plain of Na Puu Makaanau, Kaiholena and Enuhe, unique in all the world, remain unimpeded and local swimmers, fishermen and campers still have most of the shoreline to themselves, except during influxes of tourists at Punaluu Beach.

^{2/} Punalu'u Newsletter, Vol. III, No. 6, January 1, 1988.

In my opinion, the golf course constructed by the Developer, with it's superb stone walls and plantings, has proven to be a positive contribution to the area.

Not so the Colony I condominiums, a miserable "Hooverville" of outrageously-overpriced, shingled A-frames set conspicuously on a bluff overlooking the former site of Ninole Cove and springs; the only redeeming feature of these eyesores is that there isn't more of them.

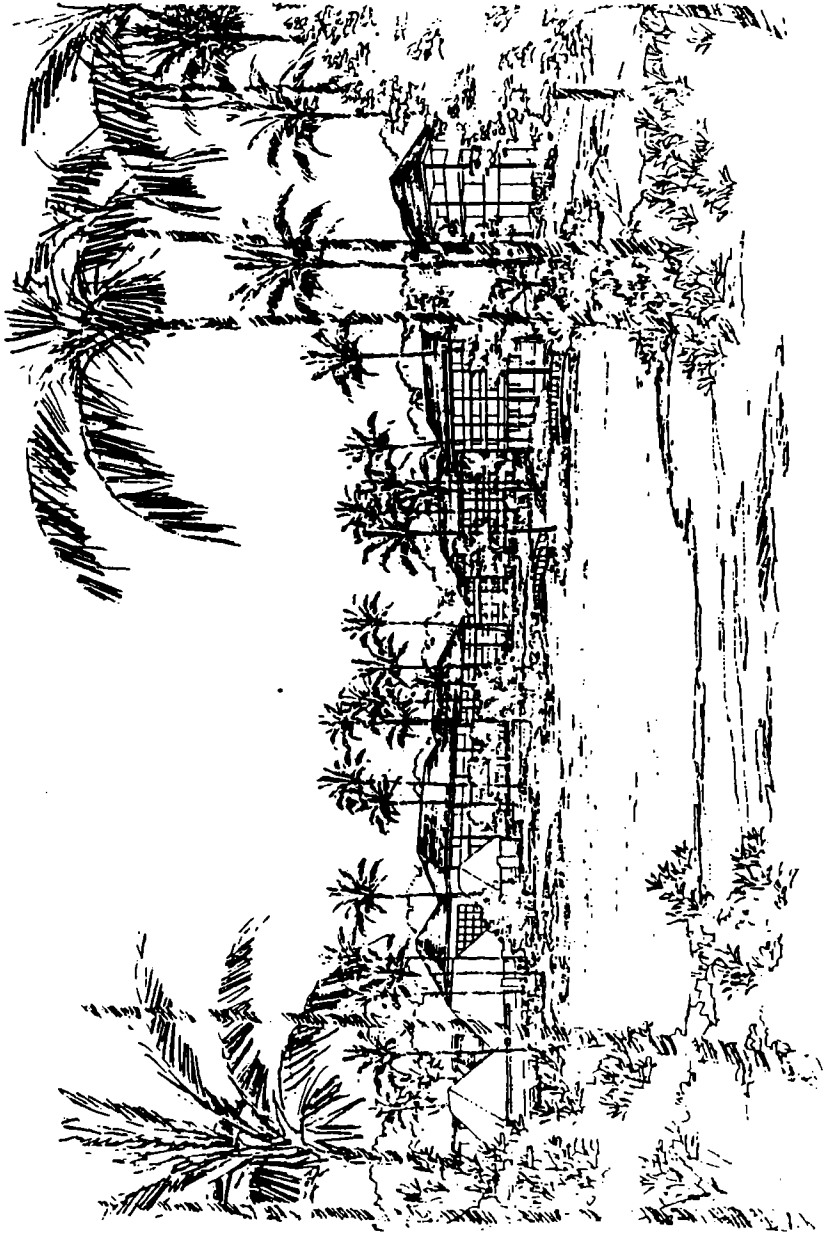
The Punaluu Black Sand Restaurant, built mainly of concrete and loosely based on a grass house design of indeterminate origin, is somewhat more compatible with it's surroundings, notwithstanding it's blatant tackiness.

Like the resort's clubhouse and convenience store, the grandiosely-titled "Aspen Institute for Humanistic Studies", which actually consists of three small, circular roofs supported by wooden posts and banks of jalousie windows, is notable only for it's blandness.

All told, Punaluu Resort as it presently exists is a study in mediocracy that local residents have learned to live with, and to some extent benefit from, mainly because of it's minimal impact on the coastal area, which is the heart and soul of Punaluu/Ninole.

B. PUNALUU BLACK SAND INN

As noted in comments to the previous Environmental Impact Statements, the unchanged sketch of the proposed Punaluu Black Sand Inn appearing between pp. 11-7 and 11-8 in the latest DEIS (Fig. 1 in this document) is grossly misleading in terms of



VIEW FROM EDGE OF POND LOOKING MAUKA AT EXISTING RESTAURANT AND FUTURE INN

FIG. 1 Misleading character sketch of proposed Punaluu Black Sand Inn appearing in DEIS.

CHARACTER SKETCH OF PUNALUU'U BLACK SAND INN

Punaluu Resort

K.A.U. ISLAND OF HAWAII

ARCHITECTS HAWAII LTD.

FIGURE II-9

scale and likely visual impact on the surrounding area. Not only are heights of the existing Black Sand Restaurant and planned Inn structures graphically minimized, but nearby coconut trees are enlarged to such an extent as to insult the intelligence of any reader familiar with the site. As a point of fact, the restaurant is the equivalent of at least two full stories in height.

The Developer's stubborn refusal to correct the aforementioned drawing is hardly indicative of a good-faith effort to disclose all probable impacts of the project under consideration, as required by law.

Since resort plans call for erecting the Black Sand Inn on fill material with a final grade of 22 feet above sea level, the actual visual impact of the multiple structures would be that of five or six-story buildings, clearly a violation of the spirit—if not the letter—of county height restrictions. Needless to say, locating such behemoths on the banks of the lagoon adjacent to Punaluu Black Sand Beach, one of the Big Island's premier visitor attractions, would utterly destroy that landmark's beauty and serenity (see photo montage in Fig. 2).

C. BLUFF DEVELOPMENT

Maps in the subject DEIS (see Fig. 3 in this review) substantiate that the Developer's much-touted revision of the Punaluu Resort master plan consists almost entirely of moving the previously proposed Ninole Cove Hotel to the bluff overlooking the coastline, renaming it the "Village Hotel", and relocating an unidentified number of multi-family residences, the Lagoon Club and a golf hole from the bluff to the former hotel site near Ninole

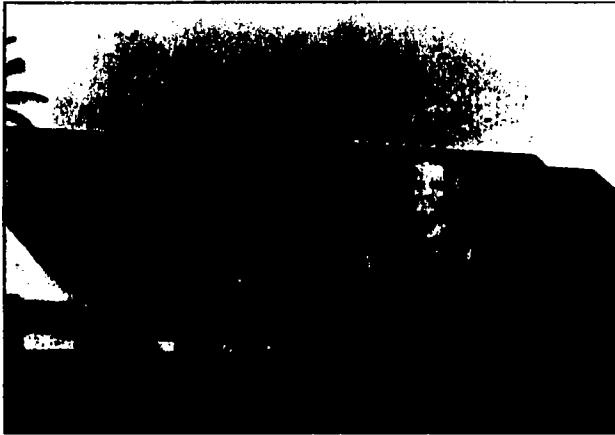


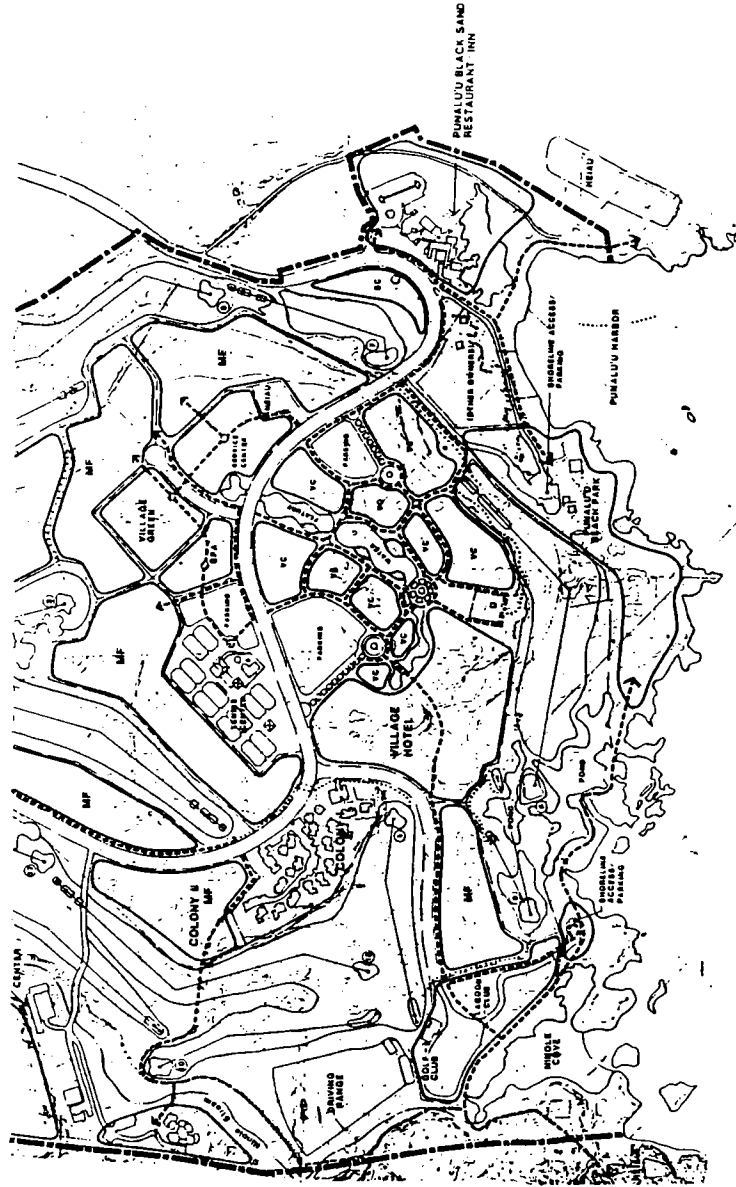
FIG. 2 Photo montage showing likely visual impact of proposed Punaluu Black Sand Inn.

Cove.

In addition to the 45-foot Village Hotel south of Hoku-loa Chapel, the Developer still intends to construct on the north and central portions of the bluff a mixed-use "village complex" to consist of one-to-four-story building clusters.

Incredibly, the DEIS under review contains not a single conceptual drawing of the proposed Village Hotel or the newly-mentioned multi-story "parking structure mauka of the hotel" (DEIS, p. II-17). Also, the lack of even a rudimentary plot plan makes it impossible to determine the specific locations of any new buildings planned as part of the resort expansion. Although character sketches of proposed bluff development as seen from above and below were included in previous impact statements, no such illustrations appear in the current DEIS.

The foregoing omissions, along with a multitude of



- VC VILLAGE CENTER/MIXED USE
- SF SINGLE FAMILY RESIDENTIAL
- MOTEL SITES/MIXED USE
- MF MULTI-FAMILY RESIDENTIAL
- SC SERVICE CENTER/MIXED USE
- PEDESTRIAN NETWORK
- GOLF CART PATHS

RESORT MASTER PLAN

Punaluu Resort



FIGURE II-7

FIG. 3 Diagram appearing in DEIS as Fig. II-7, which illustrates current Punaluu Resort Master Plan.

XII - 67

others, are suggestive of a near-contempt for the Environmental Impact Statement process on the part of the Developer, and should constitute grounds for rejection of the subject DEIS by reviewing authorities.

Even without specifics, it is obvious that the magnitude of development planned for the bluff would severely disrupt the magnificent and presently unspoiled mountain views from the county park and shoreline below. At my request, the county Planning Department recently revised the Draft General Plan to specifically recognize the unique geological formations upland of Punaluu/Ninole as "examples of natural beauty in Ka'u."

Self-serving assertions by the Developer in it's DEIS to the effect that proposed construction on the 40 to 50-foot-high bluff would not adversely impact mauka viewplanes from the coastal plain are ludicrous at best. As the photographs in Figs. 4, 5 and 6 plainly reveal, the placement of even single-story structures anywhere near the bluff's edge would devastate existing views of Mauna Loa, Makanau, Kaiholena and Enuhe from the park area.

It is simply impossible to assess the visual character or compatibility of the 1240 to 1860 multi-family dwellings that the Developer proposes to build mauka of the village complex and near Ninole Cove, since the DEIS being considered provides not one iota of information on the design, height, density or exact location of these phantom structures.

In a related matter, the Developer should explain in the Final EIS it's rationale for seeking Hotel/Resort V-1.5 zoning for most of Punaluu Village on the bluff (DEIS, Fig. II-13), which would contribute to a 55% increase in such zoning at Punaluu.

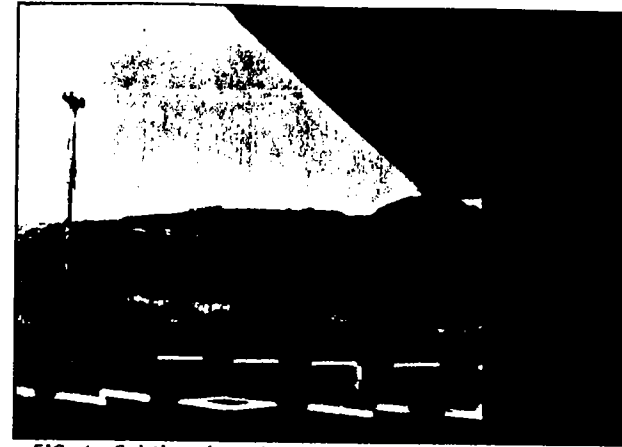


FIG. 4 Existing view of Na Pua Makanau and Kaiholena from county park pavilion No. 2.

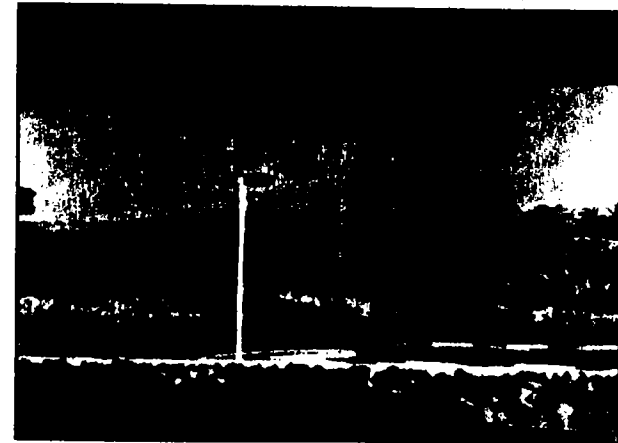


FIG. 5 Current view of Makaanau, Kaiholena and Mauna Loa from county park pavilion No. 3.

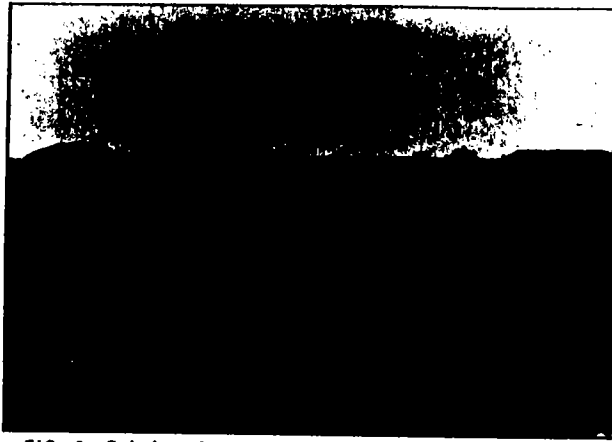


FIG. 6 Existing view of Kaiholena, Eruhe and Mauna Loa from a location south of the county park.

D. APPLICABLE PUBLIC POLICY

Clearly, the high volume of development being proposed for sites adjacent to world-famous Punaluu Black Sand Beach and along the bluff running parallel to the coastline would be completely at odds with maintenance of the area's tranquility and scenic beauty. Consequently, such development would be contrary to the following provisions of the Hawaii State Plan:

Sec. 226-4 State Goals

- (2) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.

Sec. 226-6 Economy - General

- (b) To achieve the general economic objectives, it shall be the policy of the State to:

- (14) Promote and protect intangible resources in Hawaii, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.

Sec. 226-12 Physical Environment - Scenic, Natural Beauty, and Historic Resources

- (a) OBJECTIVE: Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawaii's scenic assets, natural beauty, and multicultural/historical resources.
- (b) To achieve the scenic, natural beauty, and historic resources objective, it shall be the policy of this State to:

- (1) Promote the preservation and restoration of significant natural and historic resources.

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

- (5) Encourage the design of developments and activities that complement the natural beauty of the Islands.

Sec. 226-103 Economic

- (b) Priority guidelines to promote the economic health and quality of the visitor industry:

- (4) Encourage visitor industry practices and activities which respect, preserve, and enhance Hawaii's significant natural, scenic, historic, and cultural resources.

Sec. 226-104 Population Growth and Land Resources

- (b) Priority guidelines for regional growth distribution and land resource utilization:

- (12) Utilize Hawaii's limited land re-

sources 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.

(11) Identify all areas where priority should be given to preserving rural character and lifestyle.

(13) Protect and enhance Hawaii's shoreline, open spaces, and scenic resources.

Degradation of Punaluu's natural beauty and scenic views would also subvert the goals and policies listed in Sec. (6) NATURAL BEAUTY of the Hawaii County General Plan, as follows:

Goals:

- o Protect and enhance the integrity of areas endowed with natural beauty.
- o Protect scenic vistas from becoming obstructed.
- o Maximize opportunities for present and future generations to experience natural beauty.

Policies:

- o Establish viewplane regulations to preserve views of scenic or prominent landscapes from specific locations.
- o Identify and develop view-sites.
- o Review criteria for safeguards of natural beauty in the design of developments so that manmade elements will blend in with the natural setting.

Additionally, Coastal Zone Management/Special Management Area Regulations, Sec. (3) SCENIC AND OPEN SPACE RESOURCES, reads:

Objective:

- o Protect, preserve and where desirable, restore or improve the quality of coastal, scenic and open space resources.

Policies:

- o Ensure that new developments are compatible with the visual environment.
- o Preserve and maintain shoreline open space and scenic resources.
- o Encourage developments which are not coastal dependent to locate inland.

III.
IMPACTS OF PROPOSED RESORT ON ARCHEOLOGICAL AND HISTORICAL RESOURCES

Silhouetted against the verdant pu'u's (hills) and majestic Mauna Loa on the mauka (mountain) side and overlooking the Blue Pacific makai (ocean) side, stands the Hokuloo Church. This little shrine pays silent homage to Henry Opukahaia, the young Hawaiian whose yearning for Christ's teaching and love of his people inspired the missionaries to Hawaii. But what's unique is amidst this shrine are some of our Kupuna's resting places with headstones dating back to the 1800's, left untouched, resting peacefully in this nurturing place of the mind, soul and spirit. . . E KOMO MAI. . . VISIT PUNALU'U, soon!
Punalu'u Newsletter, Vol. II, No. 8, March 1, 1987

A. PREHISTORIC AND HISTORIC SITES

It is evident from the following passage appearing on p. 92 of the subject DEIS that a tremendous decrease in the number of extant archeological sites has occurred in the project area since resort construction commenced:

Since 1972 considerable development has occurred at Punaluu..., 47 of the 129 sites are still in existence.... Twenty-two of the sites recommended for preservation in 1972 have been protected; 4 were inadvertently covered during construction or destroyed in recent tsunamis or flooding....

While the Developer promises in it's DEIS to preserve a number of remaining sites, that document fails entirely to explore the cultural and visual ramifications of maintaining them as tourist attractions overlooked by obtrusive resort facilities. Given that the "Punalu'u area is thought by some to be the first landing area in Hawaii by the Polynesians who became the forefathers of Hawaii's people," (DEIS, p. 97) incorporating the surviving archaeological sites there into a high-density urban environment would be particularly inappropriate.

Any credible investigation of archeological resources in the Punaluu area must also take into account the significance of Punaluu Nui and Ka'ie'ie Heiaus, imposingly situated on promontories to the immediate north and south, respectively, of the proposed resort. The Punaluu Nui complex has the distinction of being the largest survivor of it's kind in the State of Hawaii, and both heiaus are still utilized for traditional Hawaiian religious observances.

These striking remnants of a once-dominant native religion stand as unique counterpoints to nearby Hokuloa Chapel and the birthplace of Henry Opukahaia, who was instrumental in introducing Christianity to the Hawaiian Islands in the early 1800's. The harmonious juxtaposition of Christian and pagan landmarks at Punaluu/Ninole offers valuable insight into Hawaii's religious heritage, and enhances the aura of timelessness and serenity that currently permeates the area. It goes without saying that that aura would be totally obliterated by the planned resort expansion.

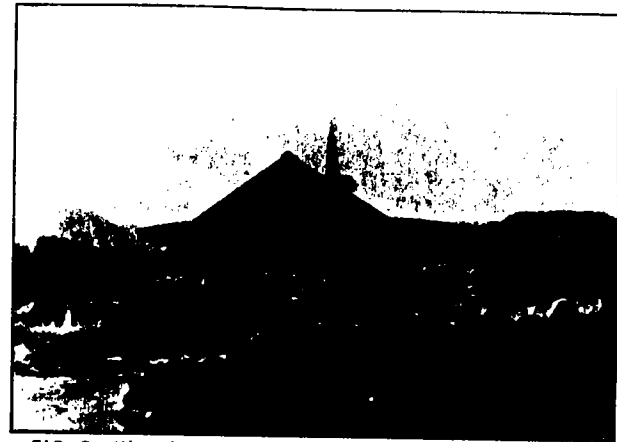


FIG. 7 Historic Hokuloa Chapel and cemetery on the bluff overlooking Punaluu Bay, bracketed in the background by Na Pua Kaiholena and Eruhe.

B. OLD GOVERNMENT ROAD

Portions of the Old Government Road (alanui aupuni) from Punaluu to Ninole have already been destroyed or blocked off by the Developer, in callous disregard for the rights of local residents. The planned relocation of two golf fairways to the coastal plain between Ninole Cove and the county park would complete destruction of that portion of the thoroughfare.

The subject DEIS is silent on whether the Developer obtained official approval prior to altering the aforementioned government road segment. If the requisite permits were not obtained, then the Developer has no legal right to exclude, as planned, vehicular traffic from the area and should be required to restore the road to it's previous configuration.

IV.
**IMPACTS OF THE PROPOSED RESORT ON RECREATIONAL,
HYDROLOGICAL AND MARINE RESOURCES**

For as far back as I can remember, I remember Punalu'u. It's been a place I've assumed would always be around. It's where I learned to swim, have great picnics and parties with family and friends, and just a place I went to for fun and relaxation. I have so many wonderful memories that have taken place at Punalu'u but I've always taken it for granted. As I have grown older and learned to respect and appreciate the things I have, I realized that I didn't look at Punalu'u the way it deserved to be looked at. I always thought of Punalu'u as just another ordinary place for me to have fun, but, in actuality, Punalu'u is a place of serene beauty that offers many recreational and relaxing activities. Now, I feel very privileged to live so near and enjoy the beauty of a place as special as Punalu'u. I love Punalu'u for all these things and more.

Hope Yonemitsu, winner of Punaluu Resort's Punalu'u Essay Contest^{3/}

A. PUNALUU BLACK SAND BEACH

The Developer has acknowledged "the likelihood that a great majority of the guests occupying the resort's planned hotel units would spend some time at Punalu'u Black Sand Beach."^{4/} Unfortunately, Punaluu Beach is only 800 feet long and 70 feet at it's widest, and constitutes the only easily-accessible swimming beach in the entire District of Ka'u. The Developer's own coastal use survey, prepared by Akala Products, Inc. (DEIS Appendix "D"), elaborated at p. 7 on the limited capacity of Punaluu Beach, as follows:

Lava bedrock and lava boulders are exposed at the water's edge along most of the beach,

^{3/} Punalu'u Newsletter, Vol. III, No. 6, January 1, 1988.

^{4/} Response from Philips Brandt Reddick to Glen M. Winterbottom's comments, January 8, 1987, p. 5.

creating poor swimming conditions. The only good, rock-free swimming site is situated immediately inshore of the boat ramp in the northeastern corner of the bay. For this reason, swimmers and sunbathers concentrate in this area. This site is also the most protected corner of the bay, so families with little children also tend to congregate here.

The Akala Products, Inc. survey also pointed out that the beach is already overcrowded and subject to pilferage of sand by tourists:

Punalu'u Beach is a regular stop for the circle-island tour buses and vans. Many independent travelers in rental cars also stop. During the day numerous tourists were observed walking along the beach, visiting the curio shops, taking pictures and picnicking. The entire beach and backshore appears crowded with people and vehicles. (At pp. 7-8.)

* * *

Signs are posted on the beach warning visitors not to remove the black sand. Many people take souvenir samples anyway. The black sand at Punalu'u is a finite resource. (At p. 8.)

Thus, it is obvious that any expansion of the existing resort would result in increased overcrowding at Punaluu Beach and further loss of sand therefrom.

B. PUNALUU BOAT RAMP AND WHARF

Although the Developer declares in it's DEIS that the privately-owned Punaluu boat launching ramp will remain open to the public, the ramp's close proximity to the only feasible ocean swimming site in the area makes it likely that increased beach utilization as a result of resort expansion would lead to conflict

between boaters and swimmers in the confined bay area, and eventual foreclosure or limitation of public use of the facility.

Pressure on the Developer to close the ramp to the general public could also come from future resort residents owning sport or fishing boats, or result from accidents involving boats being launched or trailered through the Punaluu Black Sand Inn's parking lot, the proposed access route to the ramp site.

In view of the Developer's disinclination to improve the hazardous launching facility and various statements made in the DEIS, it is fairly apparent that relocation of local boaters 20 miles south to Kaulana Bay is the Developer's ultimate aim in this respect, notwithstanding the hardships that would accrue to fishermen from increased travel time and fuel consumption required to reach offshore fishing grounds in the Punaluu area.

As the wife of a long-time Punaluu fisherman stated in a



FIG. 8 *Tiny Punaluu Black Sand Beach at low tide showing poor swimming conditions. Boat ramp is in right center of photograph.*

letter to the Hawaii Tribune-Herald appearing on December 28, 1986 (Exhibit "A" attached hereto):

My husband holds down a full-time job, as well as a part-time family farm position, and would be forced to give up his fishing boat if it became necessary for him to drive 20 miles south to Kaulana Bay (at South Point) to launch it. That is why we are supporting the concept of a state historical, cultural and recreational complex at the Punaluu to Ninole Cove area. Then the boat ramp could be improved, instead of just being left to fall apart under C. Brewer.

In a related issue, the Developer acknowledged in it's DEIS that increased resort-generated foot traffic in the old sugar wharf area, one of the most popular pole-fishing sites in Ka'u for young and old alike, could to a certain extent disturb fishermen there. It is further stated therein that the Developer intends in the future to prohibit fishermen and their families from camping in the vicinity of the wharf.

Therefore, it is probable that expansion of Punaluu Resort would result in serious negative impacts on local fishermen who presently launch boats from the ramp, fish from the wharf or camp in the area.

C. COUNTY PARK AND SHORELINE

Regarding the park and shoreline, the Developer's Akala Products coastal use survey stated on pp. 8-9 that:

According to discussions with park users, Punaluu Beach Park is a significant recreational site in the District of Ka'u. The park serves the local community as a community center on the shoreline. It is very heavily used on weekends and holidays. It is popular for

camping, but there are only about 20 camp-sites.

* * *

Many of the Punalu'u residents interviewed said that they visit Punalu'u Beach Park after work to simply get away and relax for a while. Parties are held here for special occasions, anniversaries and birthdays. The pavilions help meet these uses. It should be noted that this type of recreational or social use is common throughout the Big Island parks where, during plantation days and before the advent of tourism to any extent, area users were the prime users. In fact, the parks were built to meet the interests at that time. For example, pavilions permit large groups of people to socialize.

The beach park, in conjunction with the adjacent beach, the nearby boat ramp, and the adjoining rocky shoreline, is a primary site for a wide variety of local ocean recreation activities. Most of the Ka'u District's shoreline is comprised of low to high sea cliffs with very few protected embayments. Punalu'u Bay is one of the few areas where the sea cliffs are very low or almost non-existent. The bay is recessed into the shoreline and protected by a series of small rock islets offshore. These conditions offer good opportunities for spear fishing, pole fishing, squidding and thrownetting. According to users, Punalu'u is probably the most popular site for throw-netting in Ka'u.

Based on the foregoing, it is simply undeniable that the county park and coastline play an extremely important role in fulfilling the recreational and social needs of the local community. It is equally clear that the proposed expansion of Punaluu Resort would adversely affect the community's continued enjoyment of these valuable resources.

Relocation of two golf fairways from the bluff to the coastal plain would result in the loss of a tremendous amount of open space currently available for hiking, exploring and playing.

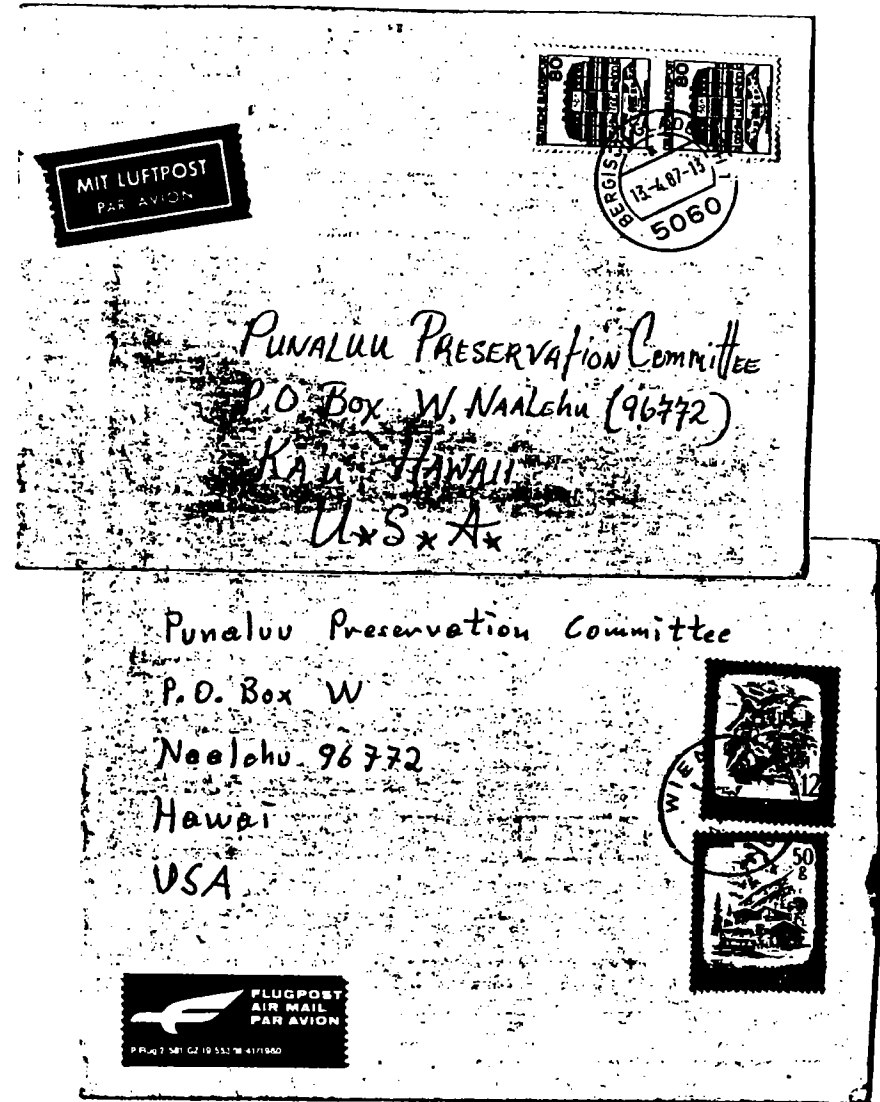


FIG. 9 Punaluu truly is world famous: envelopes containing petitions received by the Punaluu Preservation Committee from Austria and West Germany.

Dense plantings along the fairways' boundary with public property, proposed by the Developer to prevent golf ball accidents, would curtail scenic coastal expanses and instill in park users a closed-in feeling. Such negative sensations would be exacerbated by the construction of multi-story buildings atop the bluff which would block mauka views and allow visitors to gaze down on those utilizing the park and shoreline below.

Moreover, lights on the bluff, even if shielded, and normal resort-generated noise would totally destroy feelings of seclusion presently enjoyed by overnight campers at Punaluu. The Developer has gone so far as to admit that "Punalu'u Village to be located on the bluff in addition to the adjacent two proposed hotels will detract from 'the getting away from it all' experience now enjoyed by campers and coastline users."^{5/}

The Developer's much touted, but in fact minimal, proposed additions to Punaluu Park, including just one new pavilion, would be completely inadequate to absorb increased useage of park facilities by the large number of persons expected to be attracted to the area by resort expansion.

To make matters worse, the planned location of the shoreside golf fairways would preclude any expansion of the county park in a southernly direction, should the need arise, and kuleana owners to the north would be certain to resist the aquisition of their land for public use.

The possibility of future park overcrowding was recog-

nized by the Developer in the UNRESOLVED ISSUES section of the withdrawn Environmental Impact Statements, at p. IX-4: "It is possible that the county may require a permit or reservation system for some of the facilities, should use of the park reach the point where conflicts occur."

Dissention could also arise from a project-related increase in conflicting useage of the narrow, state-owned shoreline belt by resort residents, visitors, campers and fishermen, or as a result of expanded competition for limited, and in some cases already depleted, marine resources.

D. NINOLE COVE

Unlike previous impact statements, the current DEIS contains no commitment by the Developer to restore filled-in Ninole Cove and springs, or to undertake flood control measures in Ninole Stream, even though it was through the negligence of Brewer-owned Ka'u Agribusiness Co., Inc. (formerly Ka'u Sugar Co., Inc.) that much of the cove came to be filled with debris.

It is common knowledge in this area that the plantation's diversion of natural watercourses and stockpiling of fill material in flood-prone Ninole Gulch to repair it's mauka cane-haul road played a major role in the destruction of state-owned Ninole Cove as a useable recreational site. Thus, the Developer has a moral as well as legal responsibility to restore the cove, and any further delay in doing so will serve only to underscore it's bad faith.

E. SEWAGE DISPOSAL

^{5/} Response from Philips Brandt Reddick to Glen M. Winterbottom's comments, January 8, 1987, p. 7.

It is stated on p. IV-81 of the DEIS under review that, "Impacts on the nearshore and marine environment water quality could be caused by continued use of treated sewage effluent for golf course and landscape areas..." Although the document goes on to downplay the likelihood of such damage occurring in Punaluu's nearshore waters, serious questions remain as to the advisability of tremendously increasing the amount of treated sewage introduced into coastal ponds and waters by way of irrigation and percolation through porous strata.

The January 1988 issue of Reader's Digest contains an article on p. 127 entitled "Warning From The Ocean", which discusses the growing nationwide problem of sewage contamination, and reads in part:

The summer also saw widespread hypoxia, the depletion of dissolved oxygen, in near-shore waters—primarily from an overload of waste nutrients. Lobsters in Long Island Sound were found asphyxiated in their pots. * * * A significant national decline in catches of saltwater fish and shellfish has also been documented.

According to the DEIS, the nearshore and marine environment at Punaluu/Ninole currently exhibits a low to moderate diversity due to high nutrient levels in groundwater naturally flowing into it; therefore, any biological damage resulting from increased nutrient loading would serve to diminish an already sparse marine environment. In other words, the margin for error is not great.

The Developer declares on p. IV-73 of it's DEIS: "It is estimated that, at completion of the resort, the average waste water flow would be approximately 0.82 million gallons per day

(mgd). Present average flow is approximately 0.20 mgd." It is patently absurd to expect that some 2,469 to 3,596 future on-resort residents and visitors (per DEIS, Table IV-37) would produce only four times as much waste as the small number of present Colony I condominium residents. Such preposterous figures call into doubt the Developer's assurances regarding the safety of proposed sewage disposal methods.

The value of the Developer's water quality monitoring program described in the Draft Environmental Protection Plan (DEIS, Appendix "H") is problematical at best, since it's effectiveness would tend to hinge on the willingness and financial capability of the Developer, or other future resort owner, to undertake expensive corrective action should the need be disclosed. The Developer's current disinclination to restore Ninole Cove and the Old Government Road does not set a good precedent in this regard—as the old saying goes, "Actions speak louder than words."

F. SEA TURTLES

The importance of Punaluu Beach as a green sea turtle (honu) and hawksbill turtle habitat, and the negative impact that resort expansion could have on these endangered species, was discussed by two researchers interviewed by Akala Products, Inc. as part of a coastal use survey commissioned by the Developer:

* * * Punaluu has one of the largest concentrations of green turtles in the eight major islands. Hawksbills nest here and at other sites nearby that contain suitable amounts of black sand.

Turtles are sensitive to human activity and lights at night on the beach and may feel threatened. Hatchlings may be distracted by

Vienna, 11th of May

Dear unknown friends,

the petition which I return to you I've got from Grandfather Semu in California, who wrote me about his visit to your land.

I have collected the signatures in Germany, Austria and Switzerland from people who ~~the~~ honor the many native cultures and their beauty.

So take this list as a sign of the rainbow-people in Europe who know that we have many colours - but one heart.

May beauty surround you on all your ways!

Peter Thundin Bow



FIG. 10 Copy of note enclosed with petition signed by persons in Germany, Austria and Switzerland.

night lights and head inland where they are prey to animals or victims of cars instead of finding their way into the ocean. If further development means more activity and more lighting on the shoreline, it may create problems for the turtles.

Interview Number: 13

The adverse effect that resort lighting could have on turtle hatchlings was underscored by an article published in the December 1986 issue of Discover magazine and entitled "The Misguiding Light: An Eco Soap Opera" (Exhibit "B" attached hereto), which reported that:

The streets along the beaches of some Florida coastal towns are smeared with the remains of baby sea turtles that have been run over. When sea turtle hatchlings burst from their nests on the beach at night, they instinctively head for the most brightly lighted area, which until recently was the reflective water of the sea. However, nowadays it is floodlit condominiums.

V. NATURAL HAZARDS

Provisions of both the Hawaii State Plan and Coastal Zone Management/Special Management Area Regulations recognize the serious nature of this issue as follows:

Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, or other natural or man-induced hazards and disasters. (Sec. 226-13(b)(5), HRS)

(6) COASTAL HAZARDS

Objectives:

- o Reduce hazards to life and property from tsunami, storm waves, stream flooding, ero-

sion and subsidence.

Policies:

- o Control development in areas subject to coastal hazards.

The proposed Punaluu Black Sand Inn, to be located only 150 to 200 feet behind Punaluu Beach, would be particularly vulnerable to tsunami inundation, since that site has been struck repeatedly by tidal waves ranging up to 20 feet in height. The adjacent restaurant was heavily damaged in a 1975 earthquake-generated tsunami which struck without warning, and it was only due to happenstance that no lives were lost in that incident.

To make matters worse, the Developer's planned realignment of Punaluu Road (Alanui Road) to the top of the bluff, and removal of the road on the bluff's face leading to Hokuloa Chapel, would limit the number of lifesaving escape routes available to persons on the coastal plain, should an earthquake-induced tsunami strike the shoreline with little or no advance warning.

VI.

ECONOMIC FEASIBILITY OF PROPOSED RESORT

The superficiality of the Developer's market assessment for the proposed expansion of Punaluu Resort lends credence to the belief held by some Ka'u residents that it has no intention of actually developing the site, and is seeking requisite permits only to enhance the sales value of the property.

Even if the Developer is serious about pursuing the project, substantial doubts remain as to the long-term viability of such a bland, imitative development. Of the ten major coastal re-

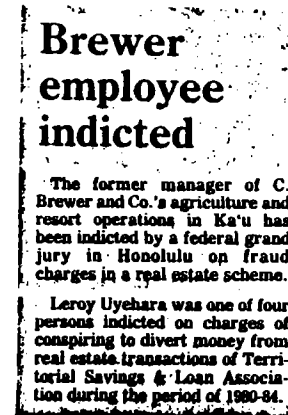


FIG. 11 Report of the indictment of Leroy Uyehara, former Punaluu Resort project manager, appearing in the Hawaii Tribune-Herald on June 25, 1987.

sorts located throughout the state that were described in Table II-9 of the DEIS, only Punaluu and Keauhou lack white sand swimming beaches, although a public beach is within walking distance of the latter.

Punaluu Resort is also from two to five times farther away from an interisland airport as are the other listed developments, and it is frequently subjected to storm waves and persistent winds.

Additionally, as the subject DEIS states on p. II-39:

Historically, Island of Hawaii hotel and resort condominium occupancy levels have been lower than the state's. Through 1986, Hawaii Island annual occupancies have ranged from 44% to 63%, while the state's have ranged between 68% to 82%, as shown in Table II-11.

While the Big Island's occupancy rate for the first half of 1987

(67.2%) was the highest since 1975, this upward trend may be adversely affected by the recent stock market plunge, continuing worldwide financial instability and a forecast recession to occur later this year.

Perhaps the most serious threat to the viability of the proposed resort would be competition from the string of luxury hotels that have been, or will be, constructed along South Kohala's "Gold Coast". Most of the amenities that an expanded Punaluu Resort could offer its guests, including a rather pathetic "wellness" program, would pale in comparison to those available at the strongly marketed Kohala resorts.

Simple common-sense dictates that the persons most likely to be attracted to a development in the isolated District of Ka'u would be those who wish to avoid the congestion and overdevelopment of other resort areas in this state. By duplicating those conditions at Punaluu, the Developer would probably alienate the one group of people who could contribute to the financial success of a project in Ka'u.

VII.
ALTERNATIVES TO PROPOSED RESORT

The developer owns 36,000 acres of land in the District of Ka'u—surely there must be an alternative hotel site among all that land that could be developed, instead of taking away from residents the only major ocean recreational site in the entire district.

June Domondon, in a Dec. 28, 1986 letter to the Hawaii Tribune-Herald (Exhibit "A")

Relative to this important subject, the Developer declares in an introduction on p. III-1 of its DEIS:

A vigorous exploration and evaluated (sic) of the environmental impacts of all reasonable alternative actions, particularly those that might enhance environmental quality or avoid or reduce some or all of the adverse environmental impacts, costs and risks, area (sic) included in order not to prematurely foreclose options which might enhance environmental quality or have less detrimental effects.

That being said, the Developer then embarks on a half-hearted "investigation" of four variants of its existing plan that are so poorly thought out as to invite dismissal due to "adverse social, economic and environmental impacts". Obviously, the Developer first decided that there were no acceptable alternatives to the resort as planned, and then attempted to justify that preconceived conclusion.

Sadly enough, it appears that the Developer has learned nothing from its colossal blunders at the now-bankrupt Waiakea Village Resort and intends, lemming-like, to clone that financial disaster, only on a far grander scale this time around.

Not only are there numerous and diverse alternatives to the proposed action, but an innovative substitute for the bland, "copycat" resort presently envisioned would provide the Developer with the best chance to achieve long-term competitive advantage and financial success.

Within the Developer's vast fee-simple landholdings in the District of Ka'u there are literally hundreds of alternate resort sites, all with sweeping ocean and mountain views. Imaginative concepts that could be investigated include resorts based on historical and/or equestrian themes, to name just two.

Since the aforestated alternatives are "known" to the



FIG. 12 Cars, tourists and trinkets: street scenes in Kailua-Kona. Is this the "future" of Punaluu?

Developer (they were specified in comments to previous impact statements) and could feasibly satisfy project objectives as listed on p. III-3 of the subject DEIS, they should be objectively evaluated therein in compliance with appropriate Environmental Impact Statement Rules.

The feasibility of an inland equestrian resort is given credence by the following proposal contained in C. Brewer's 1962 Plans For The Future - Kau:

The Hilea development plan includes a 100-unit Country House, a 50-unit Dude Ranch, 50-unit Mountain Golf Course Hotel, an 18-hole championship golf course, and a small community center surrounded by large country estate lots. (At p. 27.)

No mention whatsoever was made in the subject DEIS of a well-publicized suggestion by the Punaluu Preservation Committee



FIG. 13 Working for true progress: T-shirts incorporating a petition to preserve Punaluu Beach and Ninole Cove offered by the Punaluu Preservation Committee.

(see Exhibits "C" through "K" attached hereto) that a government entity acquire Punaluu/Ninole below Highway 11 for a world-class historical, cultural and recreational complex, in exchange for properties of like value elsewhere. Under this scenario, the Punaluu area would be enhanced to the benefit of all parties concerned, and the Developer could sell the property it receives in order to finance construction of resort accommodations at another location in Ka'u District.

This alternative should also be incorporated into the DEIS in order to fulfill regulatory requirements.

**VIII.
CONCLUSION**

The Punaluu area's fragile assets, such as sweeping mountain and coastal vistas, significant historical and archeological sites including the states's largest surviving heiau complex, and the only easily-accessible swimming beach and finest thrownetting site in all of Ka'u, should make it unthinkable that this truly unique remnant of Old Hawaii be allowed to degenerate into a sprawling Waikiki-style mini-city.

Moreover, overdevelopment of Punaluu/Ninole, renowned throughout the world for it's unspoiled beauty and serenity, could irreparably damage the long-term prospects for quality tourism in the District of Ka'u, while creation of a world-class historical, cultural and recreational complex on the site would serve to strengthen the visitor industry islanwide.

Few would downplay the many contributions that C. Brewer & Co., Ltd. has made to the betterment of this district over the

past century-and-a-half. It would be a true shame if this legacy of mutual benefit were to be tarnished so unnecessarily at this late date.

Therefore, C. Brewer Properties, Inc. should be strongly encouraged to relocate it's proposed resort to a less-sensitive site in Ka'u, so that the splendor and majesty of Punaluu may be preserved undiminished for future generations of residents and visitors alike.

Respectfully submitted on this 20th day of January, 1988.

Glen M. Winterbottom
GLEN M. WINTERBOTTOM

The corporation's first President frequently emphasized that "so long as the profits from this firm and other Island industries are put to good use they will continue to accrue, but should those who enjoy them become selfish and cease to try to practice the Golden Rule, then, and then only, will these industries languish and the days of C. Brewer & Company, Limited, be numbered."

George R. Carter, written in 1926 on the occasion of the company's 100th anniversary^{6/}

^{6/} A History Of C. Brewer & Company, Limited by Josephine Sullivan, 1926, p. 9.

Brewer's plan

I would like to comment on C. Brewer & Co's plan to build two hotels and up to 2,300 condominiums near Punaluu Black Sand Beach in Ka'u.

Although the developer claims in it's draft Environmental Impact Statement that the boat ramp at Punaluu Bay (Brewer-owned) will remain open to the public, I have my doubts after hearing Mr. Leroy Uyehara, project manager, state at his Oct. 30 meeting that conflict between boaters and swimmers in the confined bay area was sure to arise.

This is likely, since the only sandy swimming area at Punaluu Beach is right next to the boat ramp and Brewer is talking about a daily resort population of about 3,000 people. Pressure on Brewer to close the ramp to the public could also come from future resort residents owning boats, or from accidents involving boats being launched or trailered

through the new hotel's parking lot (the proposed access route).

My husband holds down a full-time job, as well as a part-time family farm position, and would be forced to give up his fishing boat if it became necessary for him to drive 20 miles south to Kaulana Bay (at South Point) to launch it. That is why we are supporting the concept of a state historical, cultural and recreational complex at the Punaluu to Ninole Cove area. Then the boat ramp could be improved, instead of just being left to fall apart under C. Brewer.

The developer owns 36,000 acres of land in the District of Ka'u — surely there must be an alternative hotel site among all that land that could be developed, instead of taking away from residents the only major ocean recreational site in the entire district.

June Domondon
Pahala

DEC 29 1986

Hawaii Tribune-Herald

THE MISGUIDING LIGHT: AN ECO SOAP OPERA

The streets along the beaches of some Florida coastal towns are smeared with the remains of baby sea turtles that have been run over. When sea turtle hatchlings burst from their nests on the beach at night, they instinctively head for the most brightly lighted area, which until recently was the reflective water of the sea. However, nowadays it is floodlit condominiums.

Where these sources of light abound, the trails of hatchlings in the sand are either confused circles or direct and deadly paths from beach to buildings. Beachfront light is responsible for the deaths of thousands of hatchlings each year in Florida, says Marydele Donnelly, director of the Sea Turtle Rescue Fund at the Center for Environmental Education in Washington, D.C.

The loggerhead, a threatened sea turtle species, can ill afford such confusion. It has enough to contend with: the heavy beach-cleaning machines that crush the eggs; the ordeal of being "cemented" into nests when heavy, wet sand is pumped onto the beach; and the danger of getting caught in the trawls of shrimpers. (New funnel-shaped trawls herd the shrimp into a sack at the back while ushering the baby turtles out through an open flap that leads to the sea. Environmentalists are recommending that the National Ma-

rine Fisheries Service make such turtle-ejection devices mandatory.)

But the misguiding lights are one of the biggest threats. "Not all beaches have construction and not all beaches are cleaned, but all beaches have lights," says Donnelly. For that reason, conservationists have urged the passage of turtle protection ordinances—laws that forbid floodlights on beaches and the bright illumination of condos with highly reflective windows.

Brevard County, which includes Cocoa Beach, Canaveral National Seashore, and more than 10,000 turtle nests each year, passed such an ordinance last summer, and St. Lucie County is preparing one now.



In Florida, bright lights have led sea turtle hatchlings in circles (bottom) or on deadly paths.

THE HAWAIIAN TRIBUNE-HERALD • 1986 • 7

Position on plan for Punaluu

By Punaluu Preservation Committee
Viewpoint

The Punaluu Preservation Committee, chaired by Mrs. Pele Hanoa, would like to take this means to clarify our position and long-range goals relative to the Punaluu Black Sand Beach / Ninole Cove area in Ka'u District. Proposed site of C. Brewer Properties' massive resort which would include two hotels, a commercial village, up to 2,300 condominium units in multi-story structures and other so-called "improvement."

Although it has been suggested that we are radical and anti-tourism, resolutions passed by our committee and incorporated into our "Petition to Preserve Punaluu Beach & Ninole Cove" clearly indicate that we recognize the role that tourism can play in expanding the economic base of this district:

—"That the Punaluu area is a priceless and fragile national treasure worthy of being preserved for future generations of residents and visitors alike.

—"That the State of Hawaii or Federal Government acquire for a world-class historical, cultural and recreational complex the hotel-zoned land at Punaluu Black Sand Beach and Ninole Cove, in exchange for surplus properties of equal value elsewhere.

—"That C. Brewer Properties, Inc. is encouraged to consider alternative, less-sensitive sites in Ka'u for a quality development that will accurately reflect the history, culture and needs of this region."

We feel that creation of such a regional park incorporating the Punaluu to Ninole coastal plain and adjacent archeological sites, including the state's largest surviving beiau complex, would allow local residents and visitors to share more equitably the varied resources of this truly

unique remnant of Old Hawaii, and would constitute a big boost to the visitor industry, not just in Ka'u, but for the entire Big Island. As a step toward this goal, we are coordinating an effort to secure historic district status for the area, on both the state and federal levels.

On the other hand, our group strongly believes that overdevelopment of historic Punaluu, renowned throughout the world for its unspoiled beauty and serenity, would irreparably damage the long-term viability of tourism in this region.

Our specific concerns with the resort as planned include potential massive overcrowding of tiny, 800-foot-long Punaluu Black Sand Beach, the only easily accessible swimming beach in the entire District of Ka'u. C. Brewer's consultant has acknowledged that "the coastal use survey included in the Draft EIS addresses the limited capacity of Punaluu Beach due to 'lava bedrock and lava boulders exposed at the water's edge along most of the beach creating poor swimming conditions,'" and "the likelihood that the great majority of the guests occupying the resort's planned hotel units (805 to 1,430) would spend some time at Punaluu Black Sand Beach." The developer's aforementioned coastal-use survey also noted that currently "the entire beach and backshore appears crowded with people and vehicles."

The Punaluu Preservation Committee also warns that locating one-to-four-story condominium clusters on the 50-foot-high bluff overlooking Punaluu Bay would severely impede the spectacular mountain views from the county park and shoreline below. Massive hotels sited adjacent to Punaluu Beach and Ninole Cove, the equivalent of five to six stories in height because of their proposed construction on fill material with a final grade of 22 feet above sea level, would

devastate scenic coastal views, as well.

Our group feels that the planned relocation of a golf fairway from the top edge of the bluff (to permit development there) to the coastal plain between Ninole Cove and the county park would prevent future expansion of the park and result in the loss of a significant amount of open space presently available for hiking, exploring and playing. C. Brewer's consultant has admitted that, "As noted, Punaluu Village to be located on the bluff in addition to the adjacent two proposed hotels will detract from the 'getting away from it all' experience now enjoyed by campers and coastline users." The developer's coastal-use survey also recognized that, "Many of the (Ka'u) residents interviewed said that they visit Punaluu Beach Park after work to simply get away and relax for awhile," and that, "The beach park, in conjunction with the adjacent beach, the nearby boat ramp, and the adjoining rocky shoreline, is a primary site for a wide variety of local ocean recreational activities."

As for the boat ramp, Brewer's consultant has stated that, "It has been recognized in the Draft EIS that there exists use conflicts between swimmers and boat operators that are launching from Punaluu boat ramp and it is likely that increased use of the swimming area will require that measures be taken to minimize the potential for accidents. Either restrictions on the areas that swimmers are allowed to use or limitations on those utilizing the boat ramp would need to be considered."

The danger posed to Punaluu's fragile coastal ecosystem by a projected 2,500 to 4,000 percent increase in the use of treated sewage for golf course irrigation has not been adequately addressed by the developer, even though the large pond adjacent to Punaluu Beach, which currently

receives golf course runoff directly through a large culvert, is visibly polluted and foul-smelling.

Brewer's consultant has agreed that "Punaluu Harbor is a favored feeding and resting area for threatened green sea turtles and a feeding, resting, breeding and nesting area for endangered Hawaiian hawksbill turtles." One of the adverse effects that resort expansion could have on such turtles was underscored by an article in Discover magazine which reported: "The streets along the beaches of some Florida coastal towns are smeared with the remains of baby sea turtles that have been run over. When sea turtle hatchlings burst from their nests on the beach at night, they instinctively head for the most brightly lighted area, which until recently was the reflective water of the sea. However, nowadays it is floodlit condominiums."

The foregoing concerns, among others, lead our committee to agree wholeheartedly with a Pahala resident who recently concluded in a letter to this newspaper that, "The developer owns 36,000 acres of land in the District of Ka'u — surely there must be an alternative hotel site among all that land that could be developed, instead of taking away from residents the only major ocean recreational site in the entire district."

The Punaluu Preservation Committee has several island-wide educational projects planned or underway, and would welcome any monetary donations or volunteer help. Our mailing address is P.O. Box 472, Naalehu, or we may be reached by telephone at 929-9047 or 929-9080. With everyone's help, perhaps lasting prosperity for the District of Ka'u can be achieved without making the same disastrous mistakes and sacrifices that people in other areas of this state now must live with.

receives golf course runoff directly through a large culvert, is visibly polluted and foul-smelling.

Punaluu resort

The Punaluu Preservation Committee would like to comment on a letter appearing in your newspaper on Feb. 22 from Mr. Emilio M. Diego, president of the Naalehu Filipino Senior Citizens. Mr. Diego stated therein that, "If C. Brewer & Co.'s proposal to develop a resort in Punaluu ... is accepted, this will create numerous jobs for the people of Ka'u, who have worked with this company for nearly a century. Our children will then have a brighter future and will not have to move away to seek employment outside our county. The tourism this would bring will benefit our county and our state."

With all due respect to Mr. Diego and his organization, who are obviously sincere in their intentions, we would like to point out that his correspondence made no mention of our group's proposal to have the planned massive resort constructed at a less-sensitive location in Ka'u,

and the Punaluu-to-Ninole coastal plain and adjacent archeological sites dedicated to the public as a world-class historical, cultural and recreational complex. This rational alternative to the project as it is presently envisioned would not only satisfy the community's understandable desire for increased employment opportunities, but would also enhance the long-term prospects for tourism in the District of Ka'u by preserving the unspoiled beauty and serenity of Punaluu, one of the Big Island's premier visitor attractions.

We believe that by supporting the aforementioned compromise and respecting the needs and concerns of those who use Ka'u District's only major ocean recreational site for fishing, swimming, camping or just to get away and relax, the Naalehu Filipino Senior Citizens could best achieve their stated objectives of "Associating, helping and caring."

Punaluu Preservation Committee
tee
Pele Hanoa
Chairwoman

Punaluu's future

Being familiar with the physical features and long history of the Punaluu area in Ka'u District, and having worked for some time in the hotel industry in Kona, I would like to briefly comment on C. Brewer Properties' proposed Punaluu Resort expansion.

I am very much afraid that Ka'u's long-time residents — particularly those employed by the troubled sugar plantation — will end up the biggest losers if Brewer follows through with their plans to build two massive hotels and some 2,000 condominium units on Punaluu's shoreline and central bluff.

There is simply no way on earth that the bland, copycat resort described in Brewer's retracted EIS could turn a profit in competition with literally dozens of similar hotels here in Kona, which have themselves experienced low occupancy rates

... The only type of visitors that a resort in isolated Ka'u District could hope to attract would be those disgusted with the commercialization and overdevelopment of West Hawaii, yet by permanently despoiling the beauty, serenity and scenic views of world-renowned Punaluu Black Sand Beach and it's environs.

Brewer would alienate this critical market segment, in effect killing the goose that laid the golden egg.

The resulting low patronage of Punaluu Resort would likely result in unsteady employment and minimal wages for those Ka'u residents having no alternative to working there, and could lead to frequent changes in ownership and eventual bankruptcy, as occurred at Brewer's Waiakea Village Resort in Hilo.

Thus, it would seem to be in their own best interests for district residents to seriously consider the oft-mentioned alternative of preserving the Punaluu area as a world-class regional park incorporating a "historical, cultural and recreational complex." with the planned resort being constructed at a less-sensitive site in Ka'u.

This logical compromise would not only protect Punaluu's fragile environment and enhance its usefulness as the District of Ka'u's one and only major ocean recreational site, but would also greatly improve the chances of establishing a viable tourist industry in the district to provide alternative employment should the sugar plantation discontinue operations at some point in the future. ...

Tom Garibaldi
Kona

EXHIBIT E

Save Punaluu

I recently visited the Big Island and hope to return in the near future. However, I was discouraged to learn that the magnificent Punaluu Black Sand Beach in Ka'u may be changed entirely by my next visit, due to the planned construction of two hotels and thousands of condos on the shoreline and bluff overlooking the ocean. I have done a fair amount of traveling and can attest to the beauty and uniqueness of the Punaluu area, especially the spectacular mountain views from the shoreline. These are the kind of new and special sights that I look forward to in traveling; I can see all the hotels and condos I want right here in California.

If Ka'u residents desire a stable, long-lasting tourist industry for employment reasons, I would strongly suggest that they follow the example of San Francisco, where I live, which has achieved terrific success as a tourist destination by preserving its unique history and culture. While at Punaluu, I signed a petition seeking to have the area preserved as a world-class historical and recreational park for both residents and tourists to share, with visitor accommodations to be built somewhere else in the district.

It seems to me that such a sensitive plan would be far more likely to succeed than would turning Punaluu into just another concrete jungle like Waikiki or Miami Beach. I have seen many, many beautiful areas on the mainland spoiled beyond repair by overdevelopment; certainly Punaluu deserves better.

Heidi Calhoun
San Francisco

EXHIBIT F

MAY 21 1987

Hawaii Tribune-Herald

APR 2 1987

Hawaii Tribune-Herald

41—West Hawaii Today, Wednesday, July 29, 1987

Preservation group adopts logo

The Punaluu Preservation Committee, a non-profit Kau community organization advocating the creation of a state regional park at Punaluu black sand beach in lieu of resort development there, announces the adoption of a new, copyrighted logo that will appear on the group's stationary, literature and soon-to-be-offered T-shirts.

According to Pete Hanou, committee chairperson and Punaluu kuleana owner, "The honu, or sea turtle, is an appropriate symbol for our preservation efforts, not only because Punaluu is a favored feeding and breeding grounds for these endangered creatures, but also because their sensitivity to stress mirrors the fragile nature of the Punaluu area itself."

Design of the logo was donated by group member Glen M. Winterbottom, a former Naalelu Dairy cowboy and self-laught commercial artist.

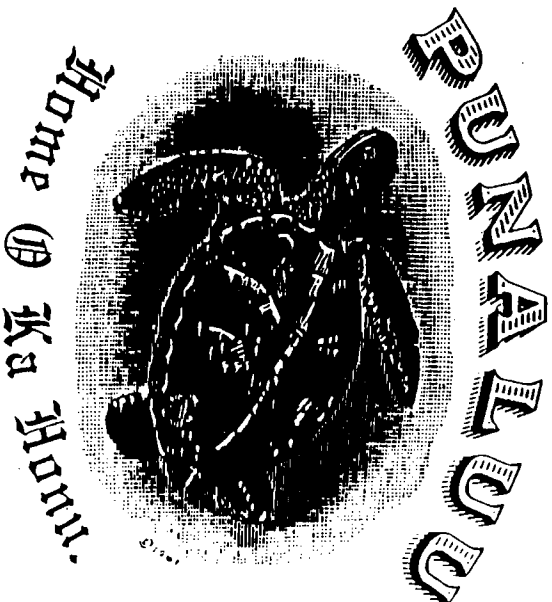


EXHIBIT H

Hawaii Tribune-Herald

JUL 3 1987

Protect Punaluu in General Plan

By Glen M. Winterbottom
Punaluu Preservation
Committee

During a June 16 public hearing held in Naalelu, the Punaluu Preservation Committee, chaired by Mrs. Pete Hanou, presented the County Planning Commission with a set of 12 proposed changes and additions to the Draft Hawaii County General Plan and Land Use Allocation Guide Map, as they relate to our cherished and majestic District of Kau.

We believe that it is possible, through farsighted and imaginative planning, to achieve lasting prosperity for this district and its people without making the same horrendous tradeoffs that residents in other areas of this island and state must now live with in perpetuity.

The text of four of our more important and far-reaching proposals is reproduced below:

(1) Add to ECONOMIC, KA'U, Profile, Courses of Action (pp. I-22-23) a passage reading, "The unspoiled natural beauty and serenity of the area should be recognized as a major economic and social asset that could attract uplifting, non-polluting industries and activities to the district. This resource must be diligently protected through appropriate review processes whenever development is prop-

osed." Rationale: paraphrases courses of action under South Kohala and North Kona profiles and is necessary to prevent degradation of this fragile and increasingly rare asset.

(2) Add to ECONOMIC, KA'U, Profile, Courses of Action a passage reading, "The County shall use its regulatory powers to promote a policy of slow, rational population growth in Kau to protect current residents from being overwhelmed or displaced by in-migrants and to preserve the district's slow-paced, rural way of life." Rationale: this policy is absolutely imperative to avert a significant deterioration in Kau's quality of life as has occurred in west Hawaii and on Oahu and Maui, where exponential population growth has created an insatiable demand for further growth to provide the spiraling population with desperately needed housing, basic services and employment opportunities.

(10) Add to LAND USE, RESORT, KA'U, Profile, Courses of Action, (p. XIII-65) a passage reading, "No hotel or resort structure in Kau shall exceed two stories in height or be constructed so as to obstruct scenic viewpoints from the shoreline or major roadways." Rationale: to the best of our knowledge, no structure for human habitation in Kau has

ever exceeded two stories in height. Extending this tradition to hotel and resort buildings would aid in the preservation of this district's unspoiled beauty and, thus, would be in the best interests of all concerned, developers included. Preventing degradation of scenic vistas from the shoreline and major roads is in accordance with goals and policies of the General Plan (pp. VI-2-3) and constitutes yet another necessary element of a program to perpetuate that which is special in Kau.

(12) Amend the Land Use Pattern Allocation Guide Map by redesignating the Punaluu/Ninole Special Management Area between Highway 11 and the coast from an "Intermediate Resort" classification (Incorporating Resort, Medium Density, Low Density and Open Designations) to an "Open Space Recreation Area" classification. Rationale: The proposed redesignation is justified as an initial step in securing and preserving for the people of Kau and all Hawaii Nei a State park site of inestimable historical, cultural, scenic and recreational value.

The Punaluu area's fragile assets, such as sweeping mountain and coastal vistas, significant historical and archaeological sites including the state's largest surviving heiau complex, and the only easily accessible swim-

ming beach and finest throwing site in all of Kau, should make it unthinkable that this truly unique remnant of old Hawaii be allowed to degenerate into a sprawling Waikiki style mini city.

Our committee strongly believes that development of Punaluu/Ninole, renowned throughout the world for its unspoiled beauty and serenity, would irrevocably damage the long-term viability of tourism in the district of Kau, while creation of a world-class historical, cultural and recreational complex on the site would serve to strengthen the visitor industry island-wide.

Moreover, the landowner, C. Brewer Properties, Inc., is not strapped for potential resort sites in this region; as one long time Pahala resident concluded in a letter to a local newspaper, "The developer owns 36,000 acres of land in the District of Kau — surely there must be an alternative hotel site among all that land that could be developed, instead of taking away from residents the only major ocean recreation site in the entire district."

(Postscript: readers are advised that changes and additions to the Draft General Plan and LUPAG Map may still be proposed when the draft documents come before the County Council for final approval.)

EXHIBIT

9

Group vows to fight Punalu'u plan

AUG 12 1987

By Marcia Reynolds
Tribune-Herald

A group that has opposed C. Brewer and Co. proposals for an expanded resort near Punalu'u Black Sand Beach says it will continue to fight against the project despite revised plans by the developers to move a major portion of the resort away from the beach area.

Mayor Dante Carpenter and J.W.A. "Doc" Buyers, chairman and president of C. Brewer and Co. Ltd., jointly announced Friday that a previously proposed 350-room Ninole Hotel will be relocated mauka, off the shoreline and integrated into the Punalu'u Village.

As part of the revised plans, a new "ocean-oriented golf hole" will utilize a portion of the area vacated by the relocation of the proposed Ninole Hotel.

"This new par 3 hole will combine with a previously proposed ocean-oriented par 5 hole to create a unique golfing experience and increased open space," Buyers said Friday.

But following the Friday announcement by the mayor and C. Brewer officials, a Punalu'u Preservation Committee spokesman said his group "intends to continue lobbying for adoption by the Hawaii County Council of General Plan amendments that would, among other things, set a two-story height limit for resort and hotel structures in Ka'u, prohibit the degradation of scenic vistas from major roadways and the shoreline in this district, and redesignate the Punalu'u Special Management Area below Highway 11 as an Open Space Recreation Area."

And the spokesman, Glen M. Winterbottom, said the group will continue to coordinate efforts aimed at securing historic district status for the Punalu'u to

Ninole coastal plain and adjacent archeological sites, and will pursue the creation of a world-class regional park and historical, cultural and recreational complex within the Punalu'u Special Management Area.

Peter Moynahan, senior vice president of development for C. Brewer Properties, Inc., said some statements made by Winterbottom were misleading.

Winterbottom said Brewer was proposing a four-story hotel on the bluff overlooking Punalu'u Bay; 60 to 80 condominium units on the site near the beach where the hotel had previously been planned, an a five-to-six-story hotel adjacent to the beach near the present Punalu'u Black Sand Restaurant.

Winterbottom also said the 350-room hotel proposed on the bluff would surround the historic Hokuhoa chapel and cemetery.

Moynahan said C. Brewer will be seeking to down zone the area near the beach from hotel to multi-family use, but the company is not proposing any construction of condominiums at this time.

And he said the 150-room hotel planned near the Punalu'u Black Sand Restaurant will be mauka of the restaurant and adjoining ponds and will be three stories in height.

Moynahan also said the hotel on the bluff will not surround the Hokuhoa chapel and cemetery.

The Punalu'u Preservation Committee also is concerned the new golf course plan will prevent any future expansion of the county Punalu'u Beach Park.

But Moynahan said Brewer will expand the park, including addition of more shoreline area.

"It will not conflict with the golf hole," Moynahan said.

See GROUP,
Page 8

Hawaii Tribune-Herald

GROUP

From Page 1

He said there "is no demonstrated conflict, only a potential for conflict" between the resort plans and the existing uses of the popular Punalu'u Beach Park.

Moynahan noted that Brewer plans a "beach off the beach" at the hotel on the bluff to alleviate some of the impact when more tourists visit the area.

The Punalu'u Preservation Committee, consisting of between six and 20 members according to Winterbottom, is also concerned about increase in the use of treated sewage for golf course irrigation.

Winterbottom said the treated sewage poses a threat to the "fragile coastal ecosystem, which includes habitats of the endangered green sea turtle and threatened Hawaiian hawkbill

turtle."

But Moynahan said, "There is no evidence the additional treated sewage will degrade the turtle environment." And he added the environmental impact could be mitigated by the manner in which the waste water is treated and used.

On suggestions that C. Brewer build a resort on mauka land it owns in Ka'u, Moynahan said, "The plain fact of the matter is, there are no successful resorts in Hawaii in the mountains. People come to Hawaii for the climate and the proximity to the shoreline."

Moynahan said the company would respond in writing and in more detail to the concerns of the Punalu'u Preservation Committee after reviewing the statement issued by Winterbottom.

Punaluu committee's response

By Glen M. Winterbottom
Viewpoint

The Punaluu Preservation Committee would like to take this means to respond to an Aug. 7 joint announcement by C. Brewer & Co., Ltd. president J.W.A. "Doc" Buyers and Mayor Dante Carpenter that the corporation has made "significant changes" to its proposed plans for the expansion of Punaluu Resort in Ka'u.

This response serves to clarify a front-page story captioned "Group vows to fight Punaluu plan," which appeared in this newspaper on Aug. 12. It should be noted that the article's headline was selected by T-H personnel and was not based on any specific comments by members of our committee. To date, 100 percent of our total expenditures of less than \$300 have been directed solely towards educating the general public, and government and corporate officials about what stands to be lost through senseless overdevelopment of Punaluu and Ninole and identifying viable alternatives that could provide at least an equal number of needed employment opportunities in this district.

To the best of our knowledge, C. Brewer Properties Inc.'s much publicized resort plan revisions consist only of relocating the planned four-story Ninole Cove Hotel to the bluff overlooking Punaluu Bay and moving 60 to 80 condominium units (which could be used as hotel rooms) and a golf fairway to the former hotel site next to Ninole Cove.

We would like to emphasize that, in addition to the aforementioned condominium units and relocated hotel, C. Brewer Properties is also still requesting the county permission to construct a hotel near the famous Punaluu Black Sand Beach which will rise some 67 feet above the sea level, a mixed-use complex to consist of 65,000 square feet of commercial space and 330 to 500 multi-family/hotel units in one-to-four-story buildings on the bluff surrounding historic Holulua Chapel and cemetery on three sides, up to 1,800 other

multiple-family residential units in the Special Management Area below Highway 11, and 110 to 125 single-family residences.

Thus, while the resort's probable negative impact on scenic vistas may be slightly reduced in the vicinity of Ninole Cove, depending on the design of the proposed condominium units there, construction of a large, multi-story hotel on the bluff would make severe disruption of magnificent mauka views from the county park and shoreline below all the more inevitable.

In every other respect, the potential adverse impacts of the planned resort remain exactly the same as before. Shuffling hotel rooms will not alter the likelihood of massive overcrowding at tiny, 800-foot-long Punaluu Black Sand Beach, the only easily accessible swimming beach in the entire District of Ka'u. C. Brewer's consultant has acknowledged that "the coastal use survey included in the Draft EIS addresses the limited capacity of Punaluu Beach due to 'lava bedrock and lava boulders exposed at the water's edge along most of the beach creating poor swimming conditions,'" and "the likelihood that the great majority of the guests occupying the resort's planned hotel units (805 to 1,430) would spend some time at Punaluu Black Sand Beach." The developer's coastal use survey also noted that, currently, "The entire beach and backshore appears crowded with people and vehicles."

C. Brewer Properties still intends to relocate a golf fairway from the top of the bluff to the coastal plain between Ninole Cove and the county park, which would prevent (following Brewer's token enlargement of the park) any future expansion of that facility and result in the loss of a huge amount of open space presently available for hiking, exploring and playing. The developer's consultant has admitted that, "As noted, Punaluu Village to be located on the bluff in addition to the

adjacent two proposed hotels will detract from the 'getting away from it all' experience now enjoyed by campers and coastline users."

The proposed plan changes will do nothing to alleviate the concerns of those Ka'u fishermen who currently use the Brewer-owned boat ramp at Punaluu. C. Brewer Properties' consultant has stated in regards to use conflicts in the confined bay area: "Either restrictions on the areas that swimmers are allowed to use or limitations on those utilizing the boat ramp would need to be considered."

Furthermore, the danger posed to Punaluu's extremely fragile coastal ecosystem, which includes habitats of the endangered green sea turtle and threatened Hawaiian hawksbill turtle, by a projected 2,500 to 4,000 percent increase in the use of treated sewage for golf course irrigation remains unchanged, despite Brewer's proposed plan alterations.

In view of the foregoing, the Punaluu Preservation Committee intends to continue lobbying for adoption by the Hawaii County Council of General Plan amendments that would, among other things, set a two-story height limit for resort and hotel structures in Ka'u, prohibit the degradation of scenic vistas from major roadways and the shoreline in this district, and redesignate the Punaluu Special Management Area below Highway 11 as an "Open Space Recreation Area."

Moreover, our group will continue to coordinate efforts aimed at securing historic district status for the Punaluu-to-Ninole coastal plain and adjacent archeological sites, and will pursue the creation of a world-class regional park and historical, cultural and recreational complex within the Punaluu Special Management Area.

We remain convinced that these proposals are in the best interests of all parties concerned, including C. Brewer & Co., Ltd., and offer the people of Ka'u the best chance for obtaining long term prosperity without suffering the same

terrible side-effects that residents of other areas of this island and state must now endure.

It has been noted time and time again that C. Brewer & Co., Ltd., owns some 36,000 acres of land in the District of Ka'u; if that firm's president truly wishes to "be in synch with the community," as he has stated, then he should begin investigating alternative hotel sites amidst all that land, instead of promoting an exploitative project of dubious economic viability.

Developers have already begun the EIS process for a large resort to be constructed in the Kahuku area, west of South Point, which will take advantage of that region's seclusion and a white sand beach. What this district will need to diversify its employment base is not another competing coastal resort, but rather one which can offer visitors the many amenities of Ka'u's vast upland reaches.

In a related matter, we were disappointed, although not particularly surprised, to learn that Mayor Dante Carpenter has been meeting in secret with Brewer officials, his former employers, to assist in the formulation of their Punaluu development plans. Such a blatant conflict of interest is all the more galling given the fact that Mayor Carpenter has never once attended community meetings on the subject.

His actions lend credence to Councilwoman Lorraine Jitchaku-Isoyue's warning that, "What frightens me is that these concerns are being discussed in almost complete secrecy; therefore, the general public and many elected officials believe that the proposed developments represent only things that are good and that these developments do not harbor the potential to negatively impact our environment, infrastructure, natural resources, public services and recreational resources."

Glen M. Winterbottom is a member and spokesman of the Punaluu Preservation Committee.

Punaluu T-shirts by panel offer rare historic views

The non-profit Punaluu Preservation Committee announces the availability of its unique four-color Punaluu T-shirts in time for Christmas gift-giving.

The shirts feature historic views of Punaluu's railroad and steamship days, and incorporate a petition to preserve the Special Management Area below Highway 11 as a world-class historical, cultural and recreational complex.

The 100 percent cotton Hanes T-shirts, designed by Glen M.

Winterbottom and printed by Creative Arts Hawaii, are available in white, creme and light grey colors, and S, M, L and XL adult sizes.

They may be purchased at the Naalehu Food Center and Green Sands Mart in Naalehu, the Green Sands Fountain in Pahala, Hawaii Sportsmen on Kam Avenue in Hilo, or by sending \$10 plus 50c postage to the Committee at P.O. Box W, Naalehu, HI 96772.

February 5, 1988

Glen M. Winterbottom
P.O. Box W
Naalehu, Kau, Hawaii 96772

Attention: Glen M. Winterbottom

SUBJECT: PUNALU'U RESORT DRAFT EIS


Dear Mr. Winterbottom:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 4, 1988

Mr. Glen M. Winterbottom
P.O. Box W
Na'alehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Winterbottom:

Thank you for the copy of your letter of January 20, 1988 to Hawaii County Council, Committee on Planning regarding the subject Draft EIS. The following is provided in response to your letter.

General Comments

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project. The following responses are keyed to the general section headings of your letter.

I. Introduction

Please note that as stated on page I-1, Chapter I, Sections 1 and 2 of the Draft EIS, the Draft EIS has been prepared and submitted in support of a General Plan amendment only at this time. Further, the General Plan amendment is for a portion of the Resort mauka of the Hawaii Belt Highway and, as described in Chapter II, Section 3.3.2.13 of the Draft EIS, is for 65 acres of land, 35 of which would be designated

88 - 11X

Medium Density from Low Density and 30 of which would be designated Open from Low Density.

Future actions, such as zoning and rezoning requests, Special Management Area (SMA) permit applications, Conservation District Use Permit application and Department of Army Corps of Engineers permit application would be supported in part by the EIS and in part by additional information as required and requested by approving government agencies.

II. Visual Character and Compatibility of Proposed Resort

A. Existing Conditions

All development that has taken place at Punalu'u Resort has been in accordance with applicable federal, state and county rules and regulations. The plans for the proposed project include provisions for continuing the availability of the coastal recreational, swimming, fishing and food gathering locations presently used by residents and visitors.

Comments regarding the architectural style of existing facilities are noted.

B. Punalu'u Black Sand Inn

The conceptual sketches of facilities as shown in the Draft EIS are drawn to scale and accurately represent the relationship of the proposed facilities to the existing conditions. The sketches presented in the Draft EIS are representative only of the types of facilities that might be constructed and are not meant to imply or portray final design of facilities. Preliminary and final design activities for the facilities have not been initiated. The photo montage included in your letter is in error relative to the scale of conceptually planned facilities at Punalu'u.

C. Bluff Development

Hotel facility concept drawings and/or specific locations of buildings have not been determined at this time. As the facility's designs are developed and as specific building locations are determined, appropriate documents will be submitted to appropriate state and county agencies as required for review and approval. As noted in the General Comments section above, the intent of an EIS is to disclose the potential environmental impacts of a given project, not necessarily to present detailed drawings of the facilities

that may be built. In accordance with applicable EIS rules and regulations, sufficient data and information have been included in the EIS to describe the potential environmental impacts of the proposed project. The visual analysis included in the Draft EIS and that which will be included in the Final EIS aid in understanding and assessing the visual impact of the proposed bluff facilities.

As noted above, building facilities on the bluff have not been specifically located or exact setback distances determined at this time. Structures, including associated landscaping, on the bluff will protrude above the bluff. In an effort to more clearly portray the mauka views from the shoreline, a revised visual analysis that will be included in the Final EIS will include panoramic view photographs with sketches of the facility's concepts drawn to scale to show the extent of protrusion within the limits of the degree of planning that has occurred to date. That is, because detailed design and siting of the facilities has not been performed to date, the information to be provided in the Final EIS will be for planning purposes and to disclose the potential impacts of protrusion that may occur.

The proposed development size and density is in keeping with the existing land use designations.

The design height and density of the multifamily dwelling structures to be developed mauka of the Village Center will be in accordance with county zoning regulations. Exact locations of facilities will be determined at a later date.

Those facilities will be located within the development areas shown in the Draft EIS (see Chapter II, Figure II-7).

The proposed V-1.5 zoning for the Village Center area will replace that which currently exists for the former Ninole Cove Hotel site, which will be downzoned to a less intensive zoning classification.

D. Applicable Public Policy

The provisions of the Hawaii State Plan and their applicability to any given area or project must be reviewed in the context of the state as a whole. Those provisions that C. Brewer Properties, Inc. believes are most applicable to the proposed project are fully described in Chapter V of

the Draft EIS. Although your comments regarding your beliefs about which provisions are most applicable will be included in the Final EIS, the project conceptually described in the Draft EIS satisfies the policies set forth in your letter.

III. Impacts of Proposed Resort on Archaeological and Historical Resources

A. Prehistoric and Historic Sites

As noted in the Draft EIS (see Chapter IV, Section 3 and Appendices a and K), significant archaeological and historical sites will be preserved based upon the consulting archaeologist's recommendations and in compliance with applicable federal, state and county rules and regulations. This is in keeping with C. Brewer Properties, Inc. commitment to these resources. The establishment of an interpretive educational program as an element of the preservation and protection measures has been concurred with by appropriate state personnel.

The archaeological reconnaissance survey conducted for the proposed project (see Appendix A) did take into account the heiau located on either side of the Resort property. Further, C. Brewer Properties, Inc. has had and will continue discussions with the land owners of these features (State of Hawaii and Kamehameha Schools/Bishop Estate) regarding their plans for the heiau located on their lands and the possibility of integrating those features into the preservation and protection program that is being developed for the Resort.

B. Old Government Road

As noted in the Draft EIS (see Chapter IV, Section 5.1.3), from the inception of the Punalu'u Resort project in the early 1970's, C. Brewer Properties, Inc. has negotiated with the State of Hawaii ways to ensure continued public access to the coastline between Ninole Cove and Punalu'u Bay in a way that was compatible with the development of the Resort. The planned relocation of golf holes No. 8 and 9 to the coastal area has taken into consideration public access to the coastal resources. Easements to the coastal area have been granted to the public by C. Brewer Properties, Inc. following approval by the State Department and Board of Land and Natural Resources, as described in the Draft EIS.

As noted in the Draft EIS (Chapter IV, Section 5.1.3), although vehicular access along the shoreline will be closed, closure of vehicular access to the shoreline area fronting the Resort is expected to result in positive impacts through the protection of wildlife and environmentally sensitive areas. Furthermore, as noted in Chapter II, Section 3.3.2.4, pedestrian access will be unimpeded and a series of shoreline and beach trails would be established to direct public access to those areas that are outside of ecologically sensitive wildlife habitats and provide shoreline access along the entire shoreline. Shoreline fishing would not be restricted. The easements described in the Draft EIS have been agreed to by the State Department and Board of Land and Natural Resources and C. Brewer Properties, Inc. The shoreline and vehicular access parking area east of Ninole Cove are provided in addition to that required by the Board of Land and Natural Resources and enhance residents' and visitors' access to the shoreline.

IV. Impacts of the Proposed Resort on Recreational, Hydrological and Marine Resources

A. Punalu'u Black Sand Beach

The quotation included in your letter regarding the use of the black sand beach by tourists notes that "... The ... beach ... appears crowded..." The quotation does not specify "overcrowded" as you have paraphrased the report. The Draft EIS notes (see Chapter IV, Section 7) that based on the studies conducted, the beach and park facilities at Punalu'u have sufficient carrying capacity to accommodate forecast levels of residents and tourists. Additionally, the water play area will be the primary water-contact area for the Resort guests.

It is unfortunate that tourists and residents alike ignore signs regarding the removal of sand from Hawaii's beaches. It is hoped that the educational program aspects of the Environmental Protection Plan (Appendix E) and the Cultural Resources Management Plan (Appendix K) will serve to eliminate some of the sand taking that currently exists.

B. Punalu'u Boat Ramp and Wharf

As noted in the Draft EIS (see Chapter IV, Section 5.3.2) no changes to the boat ramp area are planned other than modifications to the access route. It appears unlikely that conflicts between boaters and swimmers would develop due to

the fact that the planned water play area of the Village would serve as the primary water contact area for visitors to the Resort.

The existing boat ramp at Punalu'u, which is located on C. Brewer property, has been used for some time by a small number of local boaters to launch their boats. It is C. Brewer's intention that this should continue.

Camping in the Resort area would be restricted to specific areas of the county beach park for the safety of the campers and to control unauthorized entry onto privately owned lands.

C. County Park and Shoreline

We agree that the county beach park and shoreline are valuable coastal resources. This is the primary reason that C. Brewer Properties, Inc. is proposing to expand the area of the county beach park and facilities. As noted previously, access to all coastal areas within the state Conservation Land Use District will remain open. With the expansion of the beach park as well as improvements to the golf course and tennis courts planned for the Resort, Ka'u District's recreational facilities would be enhanced and expanded for the community's enjoyment and use.

The open space on the coastal plain that you cite is now and has long been under private ownership.

The plantings proposed along the 8th golf hole fairway, as shown in Figure IV-19 of the Draft EIS, would be low, dense shrubbery designed to restrict pedestrian access to the fairway for safety purposes. The shrubbery would most likely be Naupaka or similar type strand vegetation that would not instill a closed-in feeling and/or block mauka views. The visual impacts resulting from buildings located on the bluff are described above.

As noted above, camping would be restricted to specific areas of the county beach park. It is possible that some campers may miss the present secluded atmosphere.

As noted above, based on the analyses performed, the carrying capacity of the planned and existing recreational facilities would be capable of handling the forecast increase in use.

The inclusion of potential park use conflicts in the Unresolved Issues chapter (Chapter IX) of the Draft EIS indicates that, as with most public parks, areas need to be set aside for specific uses, not that there would be "overcrowding" of the park.

D. Ninole Cove

Although the project that was proposed in 1986 and 1987 included a conceptual proposal for the restoration of Ninole Cove and the re-connection of Pond No. 2 to Ninole Cove and the ocean, those elements of the project have been deleted from the project.

The restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the complex and costly permitting requirements; and the property is under the ownership of the State and, therefore, conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered to work with the State Department of Land and Natural Resources, or any other interested agency, in the planning and restoration of the cove.

Allegations regarding the causes of the filling of Ninole Cove are not significant or relevant to the present Draft EIS. Further, there is no evidence to support such allegations and C. Brewer Properties, Inc. categorically denies any such allegations.

E. Sewage Disposal

Based on the marine surveys, water sample analyses and current studies conducted for the proposed project, there is no scientific evidence to suggest that the use of treated sewage for golf course irrigation has any detrimental effect on the coastal pond, nearshore or offshore waters of Punalu'u. This method of treated wastewater disposal is endorsed by the State Departments of Health and Land and Natural Resources.

The quotation from Reader's Digest refers to inland sounds and continental coastal areas, not oceanic island conditions. Continental coastal areas generally have a wide continental

shelf and Long Island Sound is in no way comparable to Punalu'u Bay in which oceanic currents rapidly disperse and dilute the minute quantities of nutrients that might leach into the oceanic waters. The decline in catches of saltwater fish and shellfish may also be due to overfishing.

The low to moderate diversity of marine life exhibited at Punalu'u is fairly typical of coastal embayments in Hawaii that are subjected to strong waves and currents, high inflows of fresh water, fishing and food gathering activities. As indicated in the Draft EIS (see Chapter IV, Sections 2.4 and 2.5), the coastal pond and nearshore waters at Punalu'u are naturally saturated with nutrients by intrusion from groundwaters with high concentrations of nutrients. Nutrients not incorporated into the plant and animal biomass in nearshore and coastal pond waters would be rapidly swept out to sea by the strong currents in Punalu'u Bay and eventually taken up by marine algae and/or widely dispersed and diluted by the Pacific Ocean.

Wastewater generation quantities are based on accepted professional engineering standards and methods of calculation as promulgated by responsible government agencies. The present average flow is 0.02 mgd, not 0.20 mgd as stated in your letter.

Per agreement between the U.S. National Marine Fisheries Service and C. Brewer Properties, Inc., the Environmental Protection Plan will be finalized at the time SMA and Corps of Engineers permit applications are prepared and submitted. At that time information relative to the construction activities that will take place will be detailed to the extent that the water quality monitoring and other elements of the Environmental Protection Plan can be definitized and costs assigned to the various elements. Funding for the implementation of the Environmental Protection Plan would be provided by C. Brewer Properties, Inc.

F. Sea Turtles

The Draft EIS discussion (see Chapter IV, Section 2.3.2) on existing conditions, impacts and mitigation measures relative to marine turtles has been reviewed in detail by the U.S. National Fisheries Service and determined to be technically adequate for EIS purposes.

V. Natural Hazards

As noted in the Draft EIS (see Chapter IV, Sections 1.4.1.2 and 5.1.2.2), Punalu'u Black Sand Inn would be constructed in accordance with applicable Flood Insurance requirements for coastal high water levels due to storms or tsunamis.

The realignment of Punalu'u Road mauka would provide an all-weather access and evacuation route. Pedestrian and/or vehicular access to Punalu'u Road via the beach parking lot access road or across the golf course in times of emergencies would be available.

VI. Economic Feasibility of Proposed Resort

The economic and marketing analyses conducted for the proposed project were performed by experienced professional economists and resort property marketing analysts using accepted methods of analysis and interpretation of results. The analyses included the possibility of other Big Island resorts being built, as well as possible changes in world-wide economic conditions.

VII. Alternatives to the Proposed Resort

The alternatives analysis included in the Draft EIS (see Chapter III), was performed in accordance with applicable EIS rules and regulations. In accordance with those regulations [see Hawaii Revised Statutes, Title 11, Department of Health, Chapter 200, Environmental Impact Statement Rules, Section 11-200-17(f)], those alternatives which could feasibly attain the objectives of the action - even though more costly - were described and explained in the Draft EIS as to why they were rejected. This fulfills the requirements as noted in the above cited regulations. Your concepts of resort alternatives based on historical or equestrian themes do not meet the project objectives. As such, these alternatives are not considered feasible by C. Brewer Properties, Inc.

VIII. Conclusion

Statements contained in this section do not address the technical adequacy of the Draft EIS descriptions of the potential environmental impacts of the proposed project.

Mr. Glen M. Winterbottom
PUNALU'U RESORT DRAFT EIS
March 4, 1988
Page 10

Thank you for your comments and participating in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBF HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

OFFICE OF

GLEN M. WINTERBOTTOM

Kau Homesteader,

Following in the
Footsteps of
Henry David Thoreau,
(1817-1862).



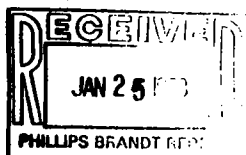
No. 27 Poha Street.

Mailing Address:
Post Office Box W.

Naalehu, Kau, H. I. January 20, 1988
(96772) U. S. America

Mr. Thomas S. Witten
PBR-Hawaii
130 Merchant St., Suite 1111
Honolulu, Hawaii 96813

Reference: Punaluu Resort DEIS



Dear Mr. Witten:-

In behalf of the Punaluu Preservation Committee, of which I am a member, I would like to submit the enclosed copies of a PETITION TO PRESERVE PUNALUU BEACH AND NINOLE COVE for inclusion in the Punaluu Resort Final Environmental Impact Statement that your firm will be preparing.

Also enclosed you will find a blank original petition with which you may illustrate your summary of the aforementioned submittal.

Finally, a copy of a letter from the State Environmental Council concerning response requirements in a matter such as this is attached for your convenience.

Thanking you for your kind attention to this submittal, we remain

Yours Respectfully,

PUNALUU PRESERVATION COMMITTEE

Per *Glen M. Winterbottom*
GLEN M. WINTERBOTTOM

John Waihee
GOVERNOR



STATE OF HAWAII
ENVIRONMENTAL COUNCIL

465 South King Street, #104
HONOLULU, HAWAII 96813

February 6, 1987

James W. Morrow
Chairman

TELEPHONE NO
(808) 540-0915

Honorable Andrew Levin
House of Representatives
State Capitol
Honolulu, Hawaii 96813

Dear Representative Levin:

Subject: Punalu'u Resort Environmental Impact Statement

Your letter regarding the subject environmental impact statement (EIS) has been forwarded to the Environmental Council by the Office of Environmental Quality Control for response since the Council is responsible for the Environmental Impact Statement Rules (Title 11, Chapter 200, Administrative Rules).

As you are probably already aware, the subject document was withdrawn by C. Brewer Properties, Inc. on February 3, 1987. However, because of the importance and general applicability of your questions, we feel a response to your inquiry is still appropriate.

Our staff reviewed the subject EIS with regard to its conformance with the provisions of the EIS Rules, especially Section 11-200-18 which details the content requirements for a Final EIS. This section requires that "comments and recommendations received on the draft EIS either verbatim or in summary" (emphasis added) are to be included in the final document. The subject EIS does include a facsimile of the petition opposed to the development and does indicate that 635 people had signed this petition. (Attached)

"The greatest fine art of the future will be the making of a comfortable living from a small piece of land" - ABRAHAM LINCOLN

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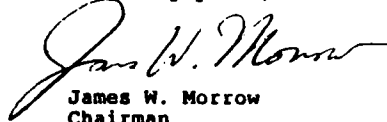
Honorable Andrew Levin
February 6, 1987
Page 2

A second requirement of the final EIS is that it should contain a list of persons, organizations and public agencies commenting on the draft EIS. Although the subject final EIS does include such a list, this list does not indicate that the petitions with the 635 names were received and considered comments. While the Council does not feel that each of the 635 names must be listed individually, the list should have included reference to the petitions and the number of signatures.

The review also revealed that the petition did raise several issues that may be considered comments on the draft EIS (Items 4 and 5 under the Whereas heading) and therefore should have been responded to by the applicant. Since Mr. Glen Winterbottom submitted the petitions, the response should have been addressed to him.

Should you have any further questions, please contact me at 537-5966 or Faith Miyamoto at 548-6915.

Sincerely yours,


James W. Morrow
Chairman

Attachment

cc: v Glen Winterbottom
Hawaii County Planning Department
Phillips, Brandt, Reddick &
Associates, Inc.

January 22, 1988
4:45 P.M.

Mr. Thomas S. Witten
PBR-Hawaii
130 Merchant St., Suite 1111
Honolulu, Hawaii 96813

Reference: Punaluu Resort DEIS

Dear Mr. Witten:-

Enclosed please find two original Punaluu petitions and 28 copies of filled petitions that were inadvertently left out of an envelope mailed to you earlier today. This second envelope will be mailed first thing tomorrow morning and should reach you about the same time as the first. Although it will be postmarked one day beyond the submittal deadline, we hope that you will be kind enough to incorporate these petitions into your final count for the Punaluu Resort Final Environmental Impact Statement.

Thanking you for your kind attention to our above request, we remain

Yours Respectfully,

PUNALUU PRESERVATION COMMITTEE


per Glen M. Winterbottom

C.C. State Office of Environmental Quality Control

Mr. Glen M. Winterbottom
PUNALU'U RESORT DRAFT EIS
March 4, 1988
Page 2

March 4, 1988

Mr. Glen M. Winterbottom
P.O. Box W
Na'alehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Winterbottom:

This is to acknowledge receipt of your letter of January 21, 1988 regarding the subject Draft EIS.

Although not required by the copy of the State Environmental Council advisory opinion attached to your letter, a copy of the Petition to Preserve Punalu'u Beach and Ninole Cove provided with your letter will be included in the Final EIS along with a summary of the petition and a copy of the Environmental Council letter.

The following responses are provided relative to the two whereas clauses (4 and 5) in your petition and noted in the Environmental Council letter.

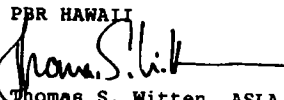
The visual attributes of the proposed project are described in Chapter IV, Section 1.8. In recognition of continuing concerns regarding the visual impacts of the proposed project, additional studies are being conducted and will be included in the Final EIS.

Building facilities on the bluff will be set back from the bluff edge. The exact setback distance has not been determined at this time. Depending on where viewed from, structures on the bluff will protrude above the bluff. In an effort to more clearly portray the mauka views from the shoreline, the revised visual analysis that will be included in the Final EIS will include panoramic view photographs with the facilities drawn to scale to show the general extent of protrusion within the limits of the degree of planning that has occurred to date. That is, because detailed design and siting of the facilities has not been performed to date, the information to be provided in the Final EIS will be for planning purposes and to disclose the potential extent of protrusion that may occur.

Relative to Whereas No. 5, as noted in the Draft EIS (see Chapter II, Section 3.2), one of the stated purposes of the proposed project is to develop a high quality, medium density resort community at Punalu'u which is economically viable and as such increases the tourism potential for Ka'u. Also, as noted in the Draft EIS (see Chapter II, Section 2) the present State Land Use designation is Urban and the Resort area is designated Minor Resort on the County General Plan.

Thank you for your comments and participating in the Draft EIS review process. As noted in our letter to you of March 4, 1988, comments and personal opinions regarding the appropriateness of a given project for a given site appear to be more appropriately addressed at agency public hearings for pertinent land use and zoning permits. Your letter and this response will be appended to the Final EIS.

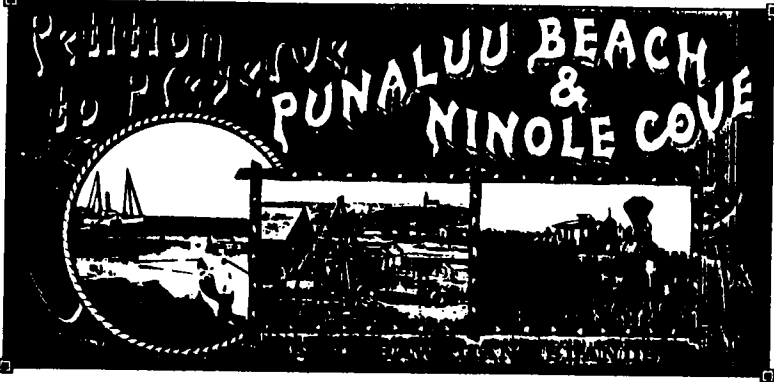
Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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PALAPALA NOI MALAMA PUNALUU.



WHEREAS:-

1. C. Brewer Properties, Inc. proposes to construct two four-story hotels near Punaluu Black Sand Beach and Ninole Cove and up to 2,000 condominium units on the bluff overlooking the bay.
2. The developer estimates that the population of the completed resort will be some 6,000 persons, more than the entire population of Ka'u at present.
3. Punaluu has only 400 linear feet of sandy shore and is the only easily accessible swimming beach in the Ka'u District.
4. Construction on the bluff will block the spectacular mountain views from the shoreline and county park.
5. Overdevelopment of historic Punaluu, renowned throughout the world for its unspoiled beauty and serenity, will irreparably damage the long-term viability of tourism in the district of Ka'u.

BE IT RESOLVED:-

1. That the Punaluu area is a priceless and fragile national treasure worthy of being preserved for future generations of residents and visitors alike.
2. That the State of Hawaii or Federal Government acquire for a world-class regional park and cultural complex the hotel-land at Punaluu Black Sand Beach and Ninole Cove, in exchange for surplus properties of equal value elsewhere.
3. That C. Brewer Properties, Inc. is encouraged to consider alternative, less sensitive sites in Ka'u for a quality development that will accurately reflect the history, culture and needs of this region.

SIGNED BY:-

3,009 PEOPLE SIGNED THIS PETITION

Name

Address

Date

CONTINUE ON REVERSE.

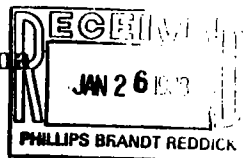
**Return to PUNALUU PRESERVATION COMMITTEE,
P. O. Box W, Naalehu (96772); Tel. No. 929-9080 or 929-9047.**

VOLUNTEERS AND DONATIONS NEEDED!



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361



January 22, 1988
RE:0483

Mr. Albert L. Lyman

-2-

January 22, 1988

Social Concerns

There appears to be a severe contradiction in locally valued aspects of the Ka'u region and the anticipated increase of population induced by the resort and associated growth. The Ka'u community clearly expresses its concern over population increase (IV-148) yet the Draft EIS presents extensive discussion of land available for housing and further development to meet the expected growing population.

In addition, the anticipated growth probably will have an effect upon housing costs. What are the impacts associated with this change?

Page IV-155 suggests that, in all likelihood, there will not be as many employees immigrating as has been the case for other major resorts, such as Kona and Kohala, because of its "rural nature and remote location". Conversely, a relatively low immigration probably will have a profound impact because of the region's vulnerability.

The issue of needed infrastructure improvement is raised several times in the Draft EIS. Where will the money come from for these improvements? Tax hikes to support these changes may lead to further polarization between Ka'u residents and the Punalu'u resort.

Nearshore and Marine Environment Water Quality

There are a number of instances in which the findings of reference citations have been overstated or illogically extrapolated. For instance, while there do not appear to be significant adverse impacts on nearshore water quality at this stage resulting from nutrient and chemical applications to the resort grounds, augmentation of existing high groundwater nutrient subsidies to coastal waters could "adversely affect nearshore or offshore receiving waters" (p. IV-74). Also, the Department of Health water sampling specifically considered bacterial contamination in offshore receiving waters, and did not address the question of nutrient leachates which could potentially affect coastal communities. Finally, Murdoch and Green's 1987 report did not "indicate that none of the chemicals used would leach into the offshore waters" (p. IV-75). The report acknowledged "the continuous application of nitrogen-containing fertilizers to the golf course could result in leaching to the brackish aquifer under conditions of high rainfall or over irrigation." They expected little contamination, due to the low rainfall in the area, and they subsequently conducted a very limited survey of offshore water quality (Green and Murdoch, 1987), results of which were ambiguous, not statistically significant, and subject to alternative interpretation.

Although UV irradiation and filtration/adsorption are elements of tertiary sewage treatment, it is somewhat of an overstatement to assert that pond storage of secondarily treated wastewater "followed by waterspraying on the golf course essentially provides tertiary treatment to the sewage" (p. IV-74, see also, p. IV-65).

Mr. Albert L. Lyman, Director
Planning Department
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Draft Environmental Impact Statement
Punalu'u Resort
Punalu'u, Hawaii

This document proposes the expansion and development of the existing Punalu'u Resort from a minor tourist destination into a major tourist resort. In doing so it is proposed that one major hotel and one minor hotel will be built along with the development of a mixed use family residential community. Furthermore, the development will include recreational and open space amenities and a commercial area, and the existing golf course will be redesigned to accommodate the development. Our review was prepared with the assistance of Michael Graves, Anthropology; Jon Matsuoka, Social Work; James Parrish, Hawaii Cooperative Fishery Research Unit; Steven Armann and Jennifer Crummer, Environmental Center.

In general, we commend the preparers of this document for their comprehensiveness and care in considering potential impacts of the proposed project. With few exceptions, discussions of major issues have been thoroughly and clearly presented, allowing rational assessment of potential problems. The Executive Summary of the Final EIS should make reference to the previous EIS prepared for the Punalu'u Resort and discuss the changes and differences in the present EIS. In addition to facilitating review, such clarification is needed to avoid any public misconception of the present development plan. Without knowing exactly what changes have occurred, we are left wondering whether certain actions are still intended. For example, it is unclear in this EIS whether or not Ninole Cove will be dredged as was the plan in the previous EIS. Additionally, Coastal Pond #2 previously was to be opened to the ocean, however, we find no mention of this action in the present EIS.

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Mr. Albert L. Lyman

-3-

January 22, 1988

Wastewater

The use of wastewater for irrigation has worked well, and we support the use of this form of conservation at Punalu'u. However, we are unclear about exactly how much effluent is proposed for use as irrigation on the golf course. Throughout the document, there are various inconsistencies of stated quantities of effluent presently being used for irrigation and proposed for future irrigation. As an example, on page IV-59 the present amount of irrigation effluent is listed as 100,000 GPD, and on page IV-62 it is listed as 20,000 GPD. We found the same inconsistency in regards to expected use.

Furthermore, we are concerned that mitigation plans have not been prepared in case the storage facilities cannot handle the amount of wastewater being produced. It appears that with prolonged rains, as experienced recently, the golf course will not require irrigating and the storage capacity of two to three days will be surpassed. In the event that this scenario does occur, where will the wastewater be diverted to? We believe it is essential that mitigation measures be prepared in case of such emergencies.

Figure IV-14

Pond 1 and the Dry Mauka Pond are mistakenly identified.

Page IV-68

What is the relationship between "limiting access to the dry mauka pond and pond number one" and, "increasing the volume of daily flushing"?

Page IV-75

The exact quantities of many of the fertilizers are missing. The ratios should include some representation of whether the quantity is a mixture or undiluted. How many gallons of Ferromec will be used every year?

Appendix E

In this section and in the EIS's discussion, there is need for a figure showing the location of the catchment basins and their potential outfall pathways.

Appendix H

We support preparation of a management plan as part of the Draft EIS. The general form of the plan appears to be adequate and workable, however, there are a few particular problems with the management plan. Our major concern with the management plan is the fact that the dollar figures have not yet been designated. We believe it is important that a comprehensive public review of the plan be conducted before the Final EIS is accepted, and this review should include the dollar figures. One of the

Mr. Albert L. Lyman

-4-

January 22, 1988

problems encountered previously with such plans is that the financial support is inadequate. Unfortunately, once the EIS is accepted there will be limited public review and awareness of the management plan.

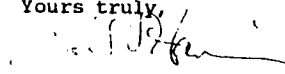
The statement on page 1 which reads "(including protection of endangered species)", should be changed to read, "(including protection of endangered and threatened species)". The Green Sea Turtle is a Threatened Species.

Archaeology

We concur with the Archaeological Survey that all historic sites should be preserved.

Thank you for the opportunity to comment on this Draft Environmental Impact Statement. We hope our comments will be helpful in preparing the final document.

Yours truly,


John T. Harrison
Environmental Coordinator

cc: Thomas S. Witten, PBR-Hawaii
OEQC
L. Stephen Lau
Michael Graves
Jon Matsuoka
James Parrish
Steven Armann
Jennifer Crummer

66 - IIX

February 5, 1988

University of Hawaii at Manoa
Environmental Center
Crawford 317
2550 Campus Road
Honolulu, Hawaii 96822

Attention: John T. Harrison,
Environmental Coordinator

SUBJECT: PUNALU'U RESORT DRAFT EIS

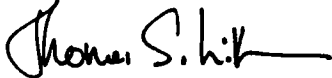
Dear Mr. Harrison:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 18, 1988

University of Hawaii at Manoa
Environmental Center
Crawford 317
2550 Campus Road
Honolulu, Hawaii 96822

Attention: Dr. John T. Harrison,
Environmental Coordinator

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Dr. Harrison:

Thank you for the copy of your letter of January 22, 1988 to Mr. Albert Lono Lyman, Director, Planning Department, County of Hawaii regarding the subject Draft EIS. The following is provided in response to your letter.

General Comments

Thank you for your complimentary remarks regarding the comprehensiveness and care in considering the potential environmental impacts of the proposed project as included in the Draft EIS. The Final EIS will contain a Summary similar to that included in the Draft EIS. A separate Executive Summary is not planned. The Forward to the Final EIS will note that the previous Final EIS (dated January 1987) was withdrawn from consideration and processing by C. Brewer Properties, Inc. We have concluded that additional reference to previous planning documents is unwise because it would become cumbersome and probably confusing. Each project should be evaluated on its own merits, not against previously proposed projects or reports. We say this because we believe this Draft EIS (December 1987) is tighter, easier to follow and evaluates a Master Plan that reflects a significant reduction in the development intensity on the coastal plain.

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Although the project that was proposed in 1986 and 1987 included a conceptual proposal for the restoration of Ninole Cove and the re-connection of Pond No. 2 to Ninole Cove and the ocean, those elements of the project have been deleted from the project. It was our intention to delete all references to the restoration of Ninole Cove from the present Draft EIS, but we may have unintentionally missed a few references. We apologize for any inconvenience these oversights may have caused.

The restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the permitting requirements are complex and costly; and the property is under the ownership of the State and, therefore, conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. would be pleased to work with your, or any other interested agency, in the planning and restoration of the cove.

Social Concerns

As with any major project in a rural area, complex social issues will arise that are difficult to evaluate. It is for this reason that we expended a considerable amount of time and effort to fully disclose the apparent and identifiable potential conflicts within the Ka'u community. Almost everyone in Ka'u treasures the rural, open spacious, uncrowded character of Ka'u. Nevertheless, almost everyone is concerned about limited job opportunities for their children as well as the present limitations in educational, cultural and social opportunities. C. Brewer Properties, Inc. has been and will continue to work with appropriate governmental and private agencies and groups to resolve those concerns. Measures to mitigate potential adverse impacts that may be caused by the project have been developed and are described in the Draft EIS (see Chapter IV, Section 4.3.5 and Appendix I).

As part of C. Brewer Properties, Inc. efforts to resolve the concerns, a Draft Punalu'u Resort Planning Process for a Program to Maximize Ka'u Resident Employment and Economic Benefits document (Appendix I) was included in the Draft EIS. Further, as

stated in the Draft EIS (Chapter I, Section 5.10 and Chapter IV, Section 4.3), C. Brewer Properties, Inc. "... will continue to work with appropriate state and county agencies such that appropriate housing requirements are properly addressed and met, and the possibility, if a demonstrated need is shown, of establishing an employee shuttle bus system and child care centers".

The existing housing supply and characteristics are described in Chapter IV, Section 4.3.1.3 of the Draft EIS and projected housing impacts, including housing affordability, are discussed in Chapter IV, Section 4.3.3.2. Housing costs in the district would increase as demand increases, only under the assumption that supply lags behind demand. Construction costs and other costs are a function of world market conditions and change as a function of conditions beyond the control of any known party.

Ka'u has a small population. Relatively small numbers of immigrants can, therefore, have an impact. To the extent possible at this time, the projected population impacts that might result from the proposed project are discussed in Chapter IV, Section 4.3.3 of the Draft EIS.

The fiscal impacts, i.e., projected state and county revenues and expenditures resulting from the proposed project are described in Chapter IV, Section 4.2.2.6 of the Draft EIS. As indicated, it is projected that total county revenues from the project are between \$3.5 and \$4.4 million per year and county expenditures are projected to be approximately \$1.3 and \$1.7 million per year at project completion. Projected state revenues and expenditures per year are estimated to range between \$6.6 and \$9.6 million and \$1.9 and \$2.8 million respectively. That is, county revenues are expected to be 2.6 to 2.7 times the expenditures incurred by the county at project completion and state revenues are expected to be 2.7 to 2.8 times the expenditures incurred by the state at project completion. Based on these projections, the proposed project is expected to contribute more than sufficient income to fund needed infrastructure improvements.

Nearshore and Marine Environment Water Quality

Based on the analyses conducted for the proposed project, it is questionable to conclude that an already "nutrient saturated" coastal environment could be adversely affected by additional nutrient subsidies. That is, because of the massive influx of high nutrient level groundwaters, nutrient levels in the coastal ponds and nearshore waters are greater than that required for maximum growth, reproduction, etc. of the biota. Water current data (see Chapter IV, Section 2.5.2 and Appendix F) indicate the efficient flushing and extent of wave, rip current and nearshore gyres in Punalu'u Bay. Similarly, as described in Chapter IV, Section 2.4.1.1, the estimated outflow from Pond No. 1 is 20 cubic feet per second (cfs) which, based on a pond surface area of about three acres and average depth of two feet, translates into an approximate flushing rate of about eight times per 24-hour period, assuming total mixing and exchange of pond water. Recent winter season measurements indicate that flushing is approximately 4.5 cfs, thereby reducing flushing to twice every 24-hour period. The pond opening has been reduced due to winter storm waves washing sand and rocks into the opening. Nonetheless, the flushing factors clearly indicate that nutrients or other water column constituents would have relatively short residence times in the nearshore waters and exceed the uptake capacity of the algal standing crop. Existing nutrient subsidies contributed naturally by the groundwater outflow (estimated by the U.S.G.S. to be approximately 30 million gallons per day along the 4,000-foot shoreline between Punalu'u and Ninole) are likely responsible for the present seasonally high standing crop of nearshore seaweeds. These same seaweeds are one of the primary attractants of the green turtles that feed in the Bay.

The study conducted by the State Department of Health was specifically designed only to determine the presence of bacteria of sanitary significance associated with coastal waters. Fecal coliform, total coliform and fecal streptococcus levels were measured to provide an indication of the presence of disease bacteria attributable to sewage pollution. Table IV-4 (page IV-57) presents the results of nutrient studies from samples of coastal spring, pond and nearshore waters. These data provide an indication of the nutrients attributable to "nutrient leachates". As noted in Chapter IV, Section 2.4.1.2, the sampling performed by the Department of Health indicated very low levels of coliform bacteria and no indication of sewage pollution in Punalu'u Bay.

The generalization in the Draft EIS with regard to the results of the Murdoch and Green report will be corrected in the Draft EIS. The statement was made in an attempt to make the material understandable to lay persons.

The residence time of secondary treated sewage in one or more ponds, followed by spraying, filtration and adsorption upon and within intensively managed golf course greens and fairways would meet the criteria for tertiary treatment when the mechanical and biological processes taking place within the grass root zone are considered as part of the treatment process. This situation is supported by the scientific work of other investigators as reported on pages IV-63 through IV-65 of the Draft EIS.

Wastewater

The reference to the quantity of wastewater presently being applied to the golf course on Page IV-58 should have read approximately 20,000 gallons per day (gpd), not 100,000 gpd. We apologize for the typographical error. As noted on page IV-62, approximately 800,000 gpd of irrigation water is applied to the golf course, of which 20,000 gpd represents treated wastewater effluent. The remainder of the irrigation water is potable water. The inconsistencies included in the Draft EIS will be corrected in the Final EIS.

With regard to your comment on storage of wastewater during periods of prolonged rains, we recognize that mitigation measures are needed to account for such situations. We are presently developing those mitigation measures and, as one example, are considering utilizing one or two of the golf course fairways as retention (percolation) basins for such emergencies. These basins would allow the treated wastewater to percolate into the soil and underlying groundwater stream. The emergency measures developed would be coordinated with the State Department of Health to assure compliance with appropriate health and safety rules and regulations.

Figure IV-14

The incorrect identification of the two ponds in the figure will be corrected in the Final EIS.

Dr. John T. Harrison
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 6

Page IV-68

The sentence in question was incorrectly typed and should have read "Re-connecting the dry mauka pond with Pond No. 1 would permit flushing of both ponds to occur and, most likely, decrease the volume and extent of the floating duckweed and Azolla filliculoides mats that currently are found along the protected margins of Pond No. 1". We apologize for the typographical error.

Page IV-75

Available additional quantity information for the fertilizers and biocides will be included in the Final EIS. The volumes vary each year, depending on rainfall, number and types of events at the golf course, etc.

Appendix E

The figure showing the locations of the retention basins and their potential outfall pathways was inadvertently left out of the Draft EIS. This oversight will be corrected in the Final EIS.

Appendix H

We appreciate your support for the Draft Environmental Protection Plan included in the Draft EIS (Appendix H). Per agreement between the National Marine Fisheries Service and C. Brewer Properties, Inc., the final Environmental Protection Plan will be prepared at the time Special Management Area (SMA) and Department of Army Corps of Engineers permit applications are prepared for the work that is proposed for the coastal ponds and adjoining areas. Sufficient detail regarding the work to be performed will be available at that time, thereby assuring that the EPP can be specific regarding the environmental protection measures that would be employed during construction activities. Further, the costs of implementing the Plan can then be estimated. C. Brewer Properties, Inc. is committed to implementation of the Plan and would provide the initial funding for that implementation once the costs are determined. Your correction to the wording of the statement on page 1 of the Draft Environmental Protection Plan will be used in the Final EIS.

Dr. John T. Harrison
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 7


Archaeology

Significant archaeological sites found on the project property will be preserved in accordance with applicable federal, state and county rules and regulations.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBB HAWAII

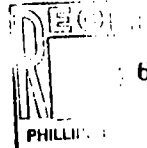

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



Ka Ohana O Kalae

Concern Hawaiians & Friends



6

Rec'd from:
NHLC
1164 BISHOP #900
Hon. Hl. 90813 (Pg. 1-11)

-2-

January 22, 1988

Mr. Albert Lono Lyman, Director
County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Draft Environmental Impact Statement
Punalu'u Resort
Punalu'u, Ka'u District, County of Hawai'i

Ka Ohana O Kalae is a grassroots Ka'u community organization whose purposes are to protect Ka'u's cultural and historical resources, protect native Hawaiian rights, education, and to maintain the tradition of aloha 'aina.

For the past six years the 'Ohana has been involved in various community issues including: the Kalae Curatorship Project (in conjunction with the Bishop Museum and the National Park Service), which sets up protection for the Kalae Historic Landmark Area; efforts to settle Ka'u native Hawaiians on DHML lands at Kama'oa-Pu'ueo; protection of Ka'u's shoreline resources; and the Mo'olelo O Ka'u Oral History Project.

Some members of Ka 'Ohana O Kalae have a particular interest and responsibility in the protection of the Punalu'u-Ninole Area for its importance as an educational and cultural resource because the area has been used by their families for generations.

GENERAL COMMENTS

Please note that one of our copies of the DEIS was missing pages, particularly figures II-6 (existing development), II-7 (resort master plan), II-12 (existing county zoning and regulatory map), II-13 (proposed county zoning), II-14 (master infrastructure plan), IV-18 (existing shoreline access), and IV-19 (proposed shoreline access). These were crucial maps to this review. We expect that other copies were also missing key pages.

COASTAL RESOURCES

The categorization of ponds at Punalu'u as being non-anchialine are unfounded. Anchialine ponds are not characterized solely by the fact that they contain Halocaridina Rubra, Metabafaeus Lohena and encrusting blue-green algae. These biological contents may be typical of ponds in West Hawaii but pond biota will vary in other parts of Hawaii where

Environmental characteristics are different. Anchialine ponds at South Point and Keaukaha contain significant, yet different organisms. The definitive classification of anchialine ponds is presented in the 1974 study by Maciolek and Brock.

Punalu'u anchialine ponds are disturbed and are habitat to a variety of exotic organisms. Research on other anchialine ponds has determined that exotics and native organisms, over time, do not coexist. Therefore, the current lack of typical anchialine pond species does not mean that the pond itself is not anchialine. If key disturbances are removed, studies have shown that endemic organisms can reestablish themselves.

The methodology used in determining the quantity and quality of marine life raises concerns (Appendix C). First, what is the value of random sampling as opposed to comprehensive systematic sampling? Anchialine ponds and Punalu'u Bay should be sampled at different tide levels since different species appear during different tides. Secondly, the water is known to be highly turbid. Was visibility in the ponds sufficient to carry out meter squared quadrant sampling? Lastly, why concentrate efforts on presenting the most numerous organisms? It is usually the more rare organisms that constitute the biological significance of an area. Moreover, since new species have been reported (e.g., the liverwort), the significance of these new species should be determined with corresponding mitigative measures before approval is granted for any changes to the existing ponds. We note that several species have been found and several turtles were observed since the last EIS submittal. We also note the absence of any new studies, so we request that the Final document these sitings. Who conducted the new study and under what conditions?

There are far too many unfounded generalizations and assumptions made about coastal resources, based on non-reliable sampling techniques which cause one to question the overall validity of the coastal study commissioned several years ago. Since then, our fishermen report that limu continues to disappear and coastal resources continue to be impacted. Recent changes in the pond biota and ocean biota have not been determined. The coastal pond study is 2 years old.

The study posits that there is a low diversity of species in the ponds and coastal waters. Without proper sampling techniques, this statement is unacceptable. Furthermore, the low diversity or density may reflect fishing pressure, a seasonal lapse, or intrusion of adverse chemicals/wastes into the natural ecosystem. Unobserved rare species may be due to lack of comprehensive and systematic observation and sampling. Mitigative measures to protect native endangered species are inadequate.

Punalu'u Bay is one of the only relatively protected bays in southeast Hawaii with voluminous fresh water discharge. This is a prime habitat for fish spawning and hatching development which was not recognized in the DEIS.

The DEIS does recognize Punalu'u Bay as a prime area for feeding and nesting of a large population of threatened and endangered sea turtles. Their favored source of food is located in this area. A most critical question to be addressed will be the impact of development on sea turtle habitat and population. The developer discounts adverse impacts due to the provision of a separate "water play" area and due to the provision of signs explaining the significance of the turtles. These are inadequate mitigative measures considering the rarity of the resource. In addition, the developer provides a "blanket" mitigative measure of the draft

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Environmental Protection Plan (Appendix H) which is currently unacceptable as a mitigative measure (see section of Draft Environmental Protection Plan).

The educational and cultural value of the coastal resources have not been recognized in the DEIS. The Punalu'u-Ninole area has traditionally been a fishing village. Residents continue this tradition by providing coastal resource field trips which teach elementary school children about the value and use of those resources.

We find it very disturbing that this DEIS has omitted all references to the restoration of Ninole Cove. Why is this significant contribution to the community deleted? C. Brewer withdrew the original Resort proposal supposedly to address community concerns which they admitted were not adequately handled in the Draft and the Final. Still, after a year of rethinking the proposal, community concerns regarding the shoreline recreational/subsistence resource have not been dealt with. If shoreline access is granted on the east side of Ninole Cove, it would seem proper and fitting that the development include the restoration of Ninole Cove for recreational/subsistence purposes, as proposed in previous EISs.

The DEIS does not recognize the boat ramp at Punalu'u as a coastal resource. The ramp is not only used for recreational purposes, but remains a critical ocean resource that relates to the economy of the region. Residents of the area presently use the boat ramp for subsistence and commercial fishing.

VISUAL CHARACTERISTICS

While the DEIS admits that the resort will be visible from the road and shoreline, it fails to adequately mitigate those impacts. Setbacks on bluffs will not mitigate visual impacts, since buildings will still be protruding obtrusively on the bluff. The DEIS admits that fishermen use the mauka pu'u as markers for fishing ko'a, but fails to identify any acceptable mitigative measure. The livelihood of many local, lifetime fishermen will be threatened if the development is allowed as proposed. Furthermore, based on the number of hotel units and the number of acres committed to hotel units, it is clear that this proposal increases the density of hotel units (increases the number of hotel units while decreasing the number of acres for hotel units) from the previous EIS proposal. The density of the project as "medium density resort" as opposed to a "low density resort" will certainly impact on the visual qualities currently enjoyed by residents and visitors of Punalu'u-Ninole. These impacts on the high visual qualities of the area need to be properly identified and mitigated.

NATURAL HAZARDS

We commend the developer for realizing that subsidence is, in fact, a natural hazard that is well documented throughout the history of the area.

The DEIS discusses natural hazards associated with the area, but the issues of adverse impacts has not been adequately addressed. For example, the Lagoon Club, some Multi-family units, the Village center/mixed uses, parts of the service center, all of Punaluu Black Sand Restaurant/Inn, Ninole Hotel, and parts of the Village Hotel fall within the "coastal high

hazard area." The DEIS does not address any appropriate mitigative measures. Furthermore, there is no mention of the number of swimmers that have drowned or have been carried out by strong riptides associated with Punalu'u Bay. We question the rationale of resort location in an area which is subject to such strong currents and wave action. In addition, since visitors will supposedly be occupied at the "water play area," why should the resort be allowed to build so close to our precious and limited recreational area? If tourists are not going to use the beach, then move the resort away from the beach. If the tourists are going to use the beach, then appropriate mitigative measures need to be identified and in place to prevent unnecessary degradation of our limited environmental and recreational resources.

PUBLIC SHORELINE ACCESS

Section 5.1.3. of the DEIS states that two public shoreline access routes, the "Old Government Road" and the "Old Government Trail" as indicated on figures IV-4 and IV-21, have been purchased by C. Brewer. In Appendix D, this road, which is open for both pedestrian and vehicular use, is heavily used by Ka'u residents for hiking and to gain access to that stretch of coastline for spear fishing, pole fishing, squidging, thrownetting, and swimming activities. The proposed access plan states that: 1) the Old Government Road between Punalu'u and Ninole will be closed and easement B is to be located at least 500 - 1,000 feet inland from this stretch of shoreline; 2) access to the shoreline area will be provided only to two shoreline points - the east side of Ninole Cove and Punalu'u Beach Park; and 3) that access along this coastline area will be restricted.

The DEIS then states that although access along the shoreline will be affected by the closure of the Old Government Road, impacts are expected to be minor and that no mitigation measures are warranted! The DEIS has no basis for such conclusions. Closure of traditional access routes heavily used by the community for a variety of shoreline recreational activities will clearly have an adverse impact on such activities and public use of the area. The DEIS should provide more specific data on the frequency and types of uses of these access routes by the community and how such uses will be affected by the closure of such access routes.

There are remnants of a kerbstone trail on the east side of Ninole Cove. The DEIS fails to mention this or include plans for the preservation of this significant historic trail.

Portions of Appendix D are outdated as they refer to 1986 plans regarding restoration of Ninole Cove and pedestrian access along the shoreline; this appendix should be modified to reflect current plans being proposed for the area.

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DRAFT ENVIRONMENTAL PROTECTION PLAN

The DEIS identifies "blanket" mitigative measures for environmental impacts by citing Appendix H: Draft Environmental Protection Plan. The draft is currently unacceptable as a mitigative measure for several reasons:

1. Timeframe for completion: The Final Environmental Protection Plan needs to be completed in the Final EIS since decision-makers and residents need to know how impacts will be mitigated before changes are made in zoning designations and permits are granted. The timeframe for implementation of the Plan should be identified in the Final EIS.
2. Designation of Manager: The manager must be identified in the Final EIS since so much of the plan relies on this person/agency. The developer has effectively transferred responsibility for "implementing any corrective action or measures" within the management area. Without this third party identified, the EIS would be unacceptable.
3. Funding: The Final EIS should identify the level of funding committed to implement this plan. Without funds earmarked for specific activities, it is not clear if any of the objectives will be achieved at the level of integrity desired by the community.
4. Community Representation: How will community concerns be represented in the long-run if all management jurisdiction is vested in the manager's position?
5. Identification of the "Management Area Buffer Zone:" The Management Area and Buffer Zone need to be identified in the Final EIS in order to determine if the buffer is an adequate mitigative measure. Moreover, since construction is not to take place in the buffer zone, the buffer should be set BEFORE the configuration of the resort is determined.
6. Restoration of Ninole Cove: The restoration of Ninole Cove should be an objective of the Final Environmental Protection Plan, as part of the restoration of Pond #2.
7. Enforcement: The plan is useless without heavy enforcement measures. Will fines be imposed for violations? Will construct be stopped if violations are made? How can we be assured that the developer will follow directives of the manager?
8. Notification period: Two weeks for construction notification is unacceptable. The manager must be afforded time to talk with resource people and local residents in order to accomplish all proposed objectives.

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HISTORIC SITES

Traditional place names for the bays, trails, and pu'u should be included in the historical section. Ponds and trails are historic sites of cultural importance, but have not been included as such in the DEIS.

The Cultural Resource Management Plan proposed in the DEIS does not adequately provide continual resident input and representation in the research design, resource recovery and management, and interpretive program areas. The DEIS does not recognize or incorporate the local area expertise of Ka 'Ohana O Kalae, one of the few community organizations to have worked in conjunction with Bishop Museum to protect a National Historic Landmark (South Point).

The CRMP, like the draft Environmental Protection Plan relies heavily on one manager/consultant. The designated manager should be identified in the Final EIS in order to fully assess the adequacy of this CRMP as a mitigative measure. Funding levels committed to the implementation of the CRMP should also be identified in the Final EIS to ensure that the objectives of the plan will be implemented with the integrity desired by the community.

Ninole is an extremely significant area to Hawaiian history. The preservation of its historical and cultural value is inadequately addressed since there are no plans to restore Ninole Cove. The community should at least benefit from the restoration of Ninole Cove, in exchange for the irreversible damage that the proposed resort will have on environmental and cultural resources that constitute quality of life and the preferred lifestyle of Ka'u residents.

The psychological and cultural impacts of destroying historic sites or of maintaining them as tourist attractions is not addressed.

The methodology for assessing levels of significance is not stated. The CRMP proposes to further refine the assessment of significance levels, however, these designations have already been made in the final archaeological report (Appendix A). Why are only 20 of 32 sites considered significant? Of the 129 sites surveyed in the area since 1968, only 47 remain today. This trend of site destruction and its implications for the future is not addressed.

NATIVE HAWAIIAN RIGHTS

The DEIS fails to discuss any impacts the proposed resort will have on native Hawaiian traditional practices exercised in the subject area. Such practices are rights protected by the Hawaii State Constitution, State statutes and case law.

Members of Ka 'Ohana O Kalae are native Hawaiian kama'aina residents of the ahupua'a of Ninole, Wailau, and Punalu'u in which the proposed resort is located. Presently, our members continue to practice various Hawaiian customs and traditions in the area such as religious ceremonies at Punalu'u Nui heiau and gathering limu and opihi from the coastal area. 'Ohana members currently fish from ancient ko'a in the coastal waters which are located by sighting certain mauka formations from the shoreline. Finally, our members have continued to use sections of the Shipman Trail, the ancient alanui, for access along the Punalu'u shoreline to Kawa Bay and burial sites.

The DEIS clearly does not address what impacts the proposed resort will have on such native Hawaiian practices. Ka 'Ohana is especially concerned that the proposed resort will adversely affect such practices by: decreasing the amount of undeveloped open space areas and thus decreasing the amount of plant and marine resources traditionally gathered by native Hawaiians; by destroying, altering, or desecrating Hawaiian religious sites still used for ceremony; by closing the ancient trail used for access along the coastline; and by obstructing viewplanes necessary for the location of ancient fishing ko'a.

Another glaring issue not addressed in the DEIS is the apparent disregard of native Hawaiian kuleana lands within the boundaries of the resort. The resort plan shows the realignment and expansion of Funalu'u Beach Park access road and parking lot across land held by the E.K.K. Bangay Estate. A legal review of land actions in the area is needed to clarify impacts on landowners.

Lastly, the DEIS does not address new rights afforded to Native Hawaiians in the State Water Code, adopted in the 1987 Legislative Session. Since Ninole Stream will be affected and regulated by the Code, with special provisions for native Hawaiian water rights, this issues must be addressed.

SOCIOECONOMIC IMPACTS:

Employee Housing Requirements

The impacts of housing construction employees with the existing housing stock appear understated. Direct employment generated by resort construction activities (at any given time) range from a low of 70 persons to a high of 300 persons (IV-116). The Punalu'u Resort would be competing with concurrent resort development in Kona and Kohala, therefore a higher percentage of construction employees are forecast to come from off-island sources (South Kohala resorts are already bringing in construction workers from Honolulu). The relatively long commuting times from Hilo or Kona would further suggest that construction employees will prefer locating in the Ka'u district even if housing is available outside. Given these conditions, projections that 20% of the construction workers would come from off-island when a range of 20% to 50% is mentioned appear low (IV-150); the DEIS figure of "between 15 and 190 construction workers...seeking housing in the district at any given time" are also rather low estimates (IV-158).

If housing subsidies received by construction workers could also drive up the cost of the existing rental housing stock in the Ka'u area, does this impact extend to both vacant rental units and currently occupied units?

The condition of current vacant lots does not appear promising in terms of accommodating this increased pressure on the community. Of the 15,450 vacant lots in the area, 86% (13,298) are considered substandard (IV-160). While the DEIS also mentions that adequate C. Brewer and other urban zoned property in the project area exists on which new housing could be constructed as required, it would be incorrect to insinuate that mere existence of urban zoned lands equates to available housing stock. The housing construction industry could find itself competing for the same

labor pool as concurrent hotel construction activities, delaying projects at the least or providing disincentives to building housing altogether at the worst. The housing pressures on the community are immediate; the promise of additional housing on currently vacant or substandard urban zoned lands remains a promise. The process of housing development rests upon far more sophisticated mechanisms to release housing to the marketplace than the simple existence of urban zoned lands.

Using figures provided in the DEIS, Table IV-10, page IV-102, the total number of vacant rental units in Ka'u, the Pahala CDP, and the Na'alehu CDP is 34.39 units (see table below). Assuming three people per vacant rental unit, the maximum number of new immigrants that can be accommodated is 103.17 persons (34.39 units * 3 persons/unit = 103.17 persons). This number does not take into account that "five percent of the district-wide units [in Ka'u] were vacant and available for rental, although these may have included many Resort units since the percentages of units available for rentals in Pahala and Na'alehu were much smaller (IV-148)." In projecting the number of Punalu'u resort construction workers, the DEIS arrives at a low figure of 15 workers and a high figure of 190 workers. In projecting the number of new immigrant operational employees, the DEIS predicts a low of 1,216 workdgers and a high of 1,339 workers. Unless vacant rental unit figures have been updated, an extremely critical deficit of rental housing to accomodate the influx of population during both construction and operational phases of the resort exists.

AVAILABLE RENTALS	KA'U	PAHALA	NA'ALEHU	TOTALS
Total Units*	1,362	511	339	2,212
% rental units	33.20%	30.20%	29.50%	
Rental units	452	154	100	707
% vacant for rent	5.00%	1.80%	9.00%	
=====				
Vacant rental units	22.61	2.78	9.00	34.39

* total year-round housing

Source: Draft Environmental Impact Statement for Punalu'u Resort: Table IV-10, page IV-102.

Housing Affordability

The lack of infrastructure for additional housing in the Ka'u district (as implied by the number of substandard lots) would mean that either county authorities would provide necessary infrastructure or developers would privately build infrastructure projects. If developed by the

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county, how soon would funds be available to begin construction? What other districts on the island are considered "priorities" ahead of the Ka'u district for the development of infrastructure? If privately developed, infrastructure costs would be most likely passed on to the consumer, raising the costs of housing.

When considering new housing, affordability of housing for purchase by a significant segment of operational employees of the resort presents a problem. The number of immigrant operational jobs generated by the built-out resort complex are given as a low figure of 1,216 and a high of 1,339. Again, a majority of these are projected to be in the "less-skilled" and presumably lower-paying job categories. To develop affordability of housing figures, the DEIS must evaluate affordability at all levels of income, beginning at \$3.99/hour.

The cumulative effect of these serious conditions would seem to warrant greater emphasis on the provision of a concrete, detailed affordable housing program in the Ka'u district than is provided for in the DEIS. It is clear that the greatest amount of cumulative pressures in the housing market will be placed upon the lower-paid segment of both the community and labor force. Mitigation proposals in the DEIS are inadequate when addressing the problem of future housing for all segments of the community.

Increased State and County Tax Revenues

The primary economic benefit of the resort project is generation of new state and county tax revenues. State tax revenues in Hawaii accrue to the State general fund. These taxes are not allocated back to counties based upon the amount of taxes generated by each county. If the resort at Punalu'u generates new and increased State tax revenues, these monies would not necessarily be allocated back to the county of Hawaii, much less the Ka'u district, but rather to the State general fund. Several of the county revenue sources are often earmarked for specific funds (e.g., fuel taxes, motor vehicle weight taxes).

Spending priorities at the county-wide level may also cause increased monies generated from the Punalu'u resort to be spent elsewhere on the island. Current growth and subsequent pressures for expansion of infrastructure networks appear to be foremost in the Kona-Kohala district. Has there been some indication by county authorities that increased public monies will be made available specifically for the Ka'u district? If not, a more accurate reading of the economic benefit generated by the Punalu'u resort would suggest that while benefits to the state and county would increase, the immediate community would bear the brunt of increased pressures on the housing market and increased demands on public services and recreational facilities without direct economic benefits of that increased usage returning to the Ka'u district.

RECREATIONAL RESOURCES

The DEIS does not adequately address impacts on recreational resources for several reasons.

Increased parking will not increase shoreline capacity but rather increase parking capacity and increase shoreline use.

Resort impacts on access to recreational resources and camping areas is not clearly stated. To what degree will customary vehicular access be maintained? Vehicular access must be provided along the Shipman Trail as decided in the 1982 Kawa Bay case (see Barba vs Okuna, Civil No. 4590, 3rd cir.). Pedestrian access is inadequate.

Impact on public use of Punalu'u Boat Ramp and mitigative measures are not adequately described. The developer hints at the incompatibility of increased recreational swimming and continued boat launching activities and makes vague reference to a proposed "policy." This mitigative policy and its impacts on ramp users should be detailed. Increased public use of Kaulana boat ramp is not an acceptable mitigative strategy because it is over 20 miles down the coast.

The DEIS does not recognize the inherent recreational qualities of the area since it equates public access with public recreation. Punalu'u is a scarce recreational resource used by many local residents. The provision of public access does not mean the provision of public recreation. For this reason, the recreational resource mitigative measures are inadequate.

MARKET ASSESSMENT/PROJECT FEASIBILITY

The remote location and lack of ancillary services make Punalu'u Resort a high risk investment (similar to the remoteness of the Molokai Sheraton and Makaha Inn which have been marginally profitable). The DEIS has even acknowledged that developers have had to convert their resorts to condominiums due to a lack of demand.

Natural features of Punalu'u such as strong winds, afternoon cloudiness, early sunsets, black sand, the rough ocean, and strong currents make the area less attractive as a resort area.

Competition from West Hawaii is not realistically considered. The latest projections indicate that a total of 28,000 resort units are proposed in West Hawaii (the DEIS only identifies 3,000 units). The Final EIS should provide more current information regarding the proposed and approved developments in West Hawaii that would invariably affect market conditions in Ka'u. In addition, little attention is brought to the proposed Hawaiian Riviera Resort which is situated in the Ka'u district. More information should be provided on proposed resorts and the market assessment should be correspondingly revised.

The projection for needed hotel rooms is based on the assumption that more visitors will come to the Big Island and that they will stay longer. The causal relationship between an increase in the critical mass of resort areas and an increase in visitor arrivals and length of stay is not clear.

FISCAL IMPACT ANALYSIS

The resort is targetting nationally recognized hotel operators with national and international reservation linkages. 90.6 percent of Japanese visitors to the Big Island are part of a tour group. It is clear that the trend in tourism is the development of vertically integrated operations. This trend is especially evident in Japanese foreign investments. They increasingly integrate their activities until all "circuits" of travel (i.e., air, ground, accommodations, etc.) are owned and operated by the Japanese firm. The firms strive to close the "circuits" of travel in order to maximize profits to these foreign firms. Eventually, all revenues will be sent out of Hawaii with the exception of labor wages.

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In order to accurately assess fiscal impact, the final EIS should include information about the ownership of travel "circuits" used by current package tours. For instance, who owns the bus lines used by tour groups? Who owns the attractions which the package tours attend? The resorts they stay in? With more information about the current ownership and activities of tour group enterprises, an accurate fiscal impact can be assessed. Without identification of "economic leakages," the fiscal impact would be inaccurate.

The fiscal impact analysis should also include all State and County contributions in terms of solid waste disposal, development of affordable housing units, development of schools, etc.

ALTERNATIVES

We commend the developer for presenting more realistic alternatives to the resort development, but disagree with the analysis. The mauka resort alternative should be reviewed in terms of benefit to the community vis a vis maintaining the shoreline area for local residents and visitors.

Another viable alternative which was not considered would be to develop the entire area as a Marine Conservation District, due to its unique marine resources, habitat, and biota.

REGIONAL PLANNING ISSUES

It should be noted that Punalu'u was designated as a resort area 15 years ago (the County General Plan, County of Hawaii, 1971). Experience since then has shown that West Hawaii is suited for destination resorts while East Hawaii is not. In the "Findings and Recommendations of the State Tourism Study," DPED, 1978, major resort destination areas throughout the State were identified. South Kohala, North Kona, South Kona, and Hilo were the only areas listed as resort destination areas in the county. Punalu'u, although slated as a resort area, was not considered as being "sufficient for tourism growth beyond 1985."

The impact of surrounding the island with competing tourist services is not addressed. Must every district have a resort or should some areas specialize in agricultural and other alternative industries? Shouldn't major resorts be located in areas which have continually demonstrated demand?

The impact of possible future expansion of the resort is not addressed. That Punalu'u Resort may provide impetus for spiral development in the region has not been addressed.

CLOSING COMMENTS

We are aware that the EIS is an informational document that discloses the environmental effects of a proposed action. However, it must also propose ways to minimize adverse effects. The impacts at Punalu'u are irrevocable. The sum of effects on the quality of the environment as well as the secondary and non-physical effects of the proposal are as much a part of the development as direct physical effects. To make this EIS a truly effective decision-making tool for the community, the State, and County, the issues raised in this review must be addressed.

February 5, 1988

NHLC
1164 Bishop Street, Suite 900
Honolulu, Hawaii 96813

Attention: Ka ohana O Kalae

SUBJECT: PUNALU'U RESORT DRAFT EIS

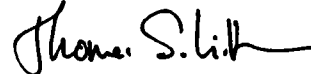
Dear Sir or Madam:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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March 4, 1988

Ka ohana O Kalae
c/o Native Hawaiian Legal Corporation
1164 Bishop Street Suite 900
Honolulu, Hawaii 96813

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Sir or Madam:

The following is provided in response to your letter of January 22, 1988 to Mr. Albert Lono Lyman, Director, County of Hawaii Planning Department regarding the subject Draft EIS.

As stated at the conclusion of your letter, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

The following responses are keyed to the general section headings of your letter.

General Comments

We apologize for the unintentional deletion of pages and figures from one of your copies of the Draft EIS and any inconvenience it may have caused.

Coastal Resources

The categorization of the coastal ponds at Punalu'u as non-anchialine is based on the definitions offered by Maciolek and Brock (1974) and Brock (1985). (See Draft EIS, Chapter XI for references). That is, the pond definition includes two elements;

Ka ohana O Kalae
PUNALU'U RESORT DRAFT EIS
March 4, 1988
Page 2

physical and biological. Both elements must be present for a pond to be defined as anchialine. Pond No. 1 has a direct surface connection to the sea. This physical attribute removes the pond from the anchialine pond definition provided by the above cited authors. Similarly, Pond No. 2 does not appear to have the subterranean outlet to the sea required to be classified as anchialine and Pond No. 3 does not have the required pond biota or all of the physical characteristics necessary for the anchialine pond definition. The introduction of typical anchialine pond organisms into the Punalu'u coastal ponds and the removal of introduced (exotic) species would not cause the reclassification of those ponds to anchialine due to the physical characteristics of the ponds. The classification of the ponds as non-anchialine does not detract from their value as coastal resources but merely serves as one means of characterizing the biological and physical characteristics of the ponds.

Surveys of both the nearshore and pond biota were both systematic and comprehensive within the working constraints imposed by wave action, rip currents and, in some wave-dominated inshore areas, limited underwater visibility. Use of the term "random" in the baseline surveys is in the context of its statistical definition to indicate efforts to obtain an unbiased result. Given the extremely low diversity and, most especially, low density of corals and benthic algae within Punalu'u Bay, any effort to use more quantitative survey techniques, e.g., point-center-quarter transects or various types of transect-intercept methods, would likely have produced an even shorter checklist of benthic biota than that developed through the use of "random" qualitative survey techniques. Surveys conducted in 1984 and 1986 were conducted at different times of the day and on different days, reflecting different tidal and lunar cycle periods. Other than Pond No. 3 and inshore areas dominated by wave action, pond and ocean waters were generally clear (visibility in Pond No. 2 was impaired by dense filamentous algal growths). Given the prevailing clear ocean and pond waters and relatively shallow depths, quadrat sampling was not handicapped or otherwise constrained by water turbidity. However, as noted in Appendix C (Marine and Coastal Pond Baseline Study), the schlieren effect created by the freshwater floating on top of the denser ocean waters required the Ka ohana O Kalae investigator to expend considerable effort to stay below the surface freshwater layer. The organic mat or "muck" that comprised most of Pond No. 2 could not be effectively sampled during the 1984 survey, but water quality improvements encountered in 1986, which were likely the result of disturbances caused by storm waves associated with Hurricane Estelle, did permit some quantitative biological population estimates to be made.

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Survey efforts were focused on the characterization of the nearshore marine community of organisms, not on defining every single species. It is the more abundant algae, fishes, corals and invertebrates that characterize and ultimately influence the composition of the nearshore marine ecosystems. There are no marine fish, corals, algae or invertebrate species in Hawaii that are classified as endangered, threatened or especially rare, although habitat or life cycle requirements may make certain organisms more or less common in some areas than in others. At Punalu'u, fishing pressures, physical disturbance by storm wave action, which limits coral diversity and abundance, and massive freshwater discharges limit the available habitat for marine organisms and create an environment of generally low species diversity as contrasted with other more protected and isolated nearshore locations on the island of Hawaii.

Liverworts found at Punalu'u are terrestrial species that generally occur in moist and damp areas and do not occur in coastal ponds. Given the occurrence of probably the same species of liverwort on the Kona coast and its occurrence around the base of trees in the Colony I condominiums at Punalu'u, the liverwort does not appear to be either particularly significant taxonomically or ecologically.

New surveys of the coastal pond, nearshore or offshore areas are not indicated as the existing surveys present comprehensive descriptions of those areas and the proposed project does not include elements that would directly adversely affect those resources. The author and person conducting both marine surveys is identified in Appendix C to the Draft EIS as well as in Chapter I, Section 11. The marine, brackish water and terrestrial species identified in the December 1987 Draft EIS are the same as those identified and listed in previous environmental documents for Punalu'u.

We have carefully re-reviewed both the 1984 and 1986 marine survey reports and find no unfounded generalizations or assumptions. The abundance and diversity of limu would be expected to differ seasonally. Additionally, limu is fed upon by a variety of herbivorous fish, invertebrates and by the numerous turtles inhabiting the bay. Similarly, strong storm waves have been cited in the Draft EIS (see Appendix C) as being partially responsible for the low abundance of limu at Punalu'u. It is also highly likely that overfishing and improper harvesting methods are partly responsible for the low abundance of limu.

The low diversity of marine reef fish and invertebrates is due to the low density of appropriate coral habitat (as a result of storm-wave action), freshwater outflows and, to some degree, fishing pressure. The diversity of species found in Pond No. 1 is comparable to that of any estuarine environment in Hawaii. Other than the efflux of cold springwaters into Pond No. 1, the pond is typical of Hawaiian coastal ponds. During the marine surveys conducted for the proposed project, every effort was made to identify all organisms, common as well as less common. As indicated above, there are no endangered, threatened or "rare" species of marine fish, invertebrates or plants in Hawaii. The mitigation measures described within the Draft EIS text as well as within Appendix H (Draft Environmental Protection Plan) have been developed in consultation with appropriate federal and state agencies.

Based on the marine surveys conducted for the proposed project and personal communications with knowledgeable persons, there is no scientific evidence to indicate that Punalu'u Bay is the "prime" habitat for "fish spawning and hatching development". Given the strong currents within the bay, impacts of storm waves and massive freshwater inflows, it is unlikely that any part of Punalu'u Bay is "prime" habitat for any species. The term "prime" habitat is not a commonly accepted ecological term.

The importance of the bay as a turtle feeding, resting and nesting area is fully described in the Draft EIS (see Chapter IV, Section 2.3.2). The information presented, including that relative to mitigation measures that are identified in the Draft EIS (see Chapter IV, Section 2.3.2), are expected to be a significant improvement over the present situation. The information and mitigation measures have been developed in consultation with the U.S. National Marine Fisheries Service (NMFS). The information and mitigation measures have been determined to be adequate by NMFS (see Chapter X, Final EIS, NMFS letter dated January 19, 1988).

By agreement between the U.S. National Marine Fisheries Service and C. Brewer Properties, Inc., the Environmental Protection Plan will be finalized at the time SMA and Corps of Engineers permit applications are prepared and submitted. This timing will allow sufficient detail regarding actual construction operations to be available to allow specific monitoring and mitigation measure requirements to be developed, specified and implemented.

The educational and cultural value of the Punalu'u area are recognized and described in various sections of the Draft EIS (see Chapter IV, Section 2.3.2.1, Section 3 and Section 4 and

Appendices A, H and K). As noted in these sections and Appendices, interpretive educational programs would be established to inform residents and visitors of the ecologically sensitive nature of the area and of the archaeological and historical resources of the area.

Although the project that was proposed in 1986 and 1987 included a conceptual proposal for the restoration of Ninole Cove and the re-connection of Pond No. 2 to Ninole Cove and the ocean, those elements of the project have been deleted from the project.

The restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the complex and costly permitting requirements; and the property is under the ownership of the State and, therefore, conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered to work with the State Department of Land and Natural Resources, or any other interested agency, in the planning and restoration of the cove.

The shoreline access proposed to be established on the east side of Ninole Cove has been planned in recognition of resident's desire to have a means of driving close to fishing locations. Such access is not connected with the restoration of the cove.

The boat launching ramp and the potential impacts of the proposed project on that ramp are discussed in Chapter IV, Sections 5.1.2 and 7. As indicated in the Draft EIS, the ramp will continue to be available to all users of the facility.

Visual Characteristics

As noted in your letter, the visual attributes of the proposed project are described in Chapter IV, Section 1.8. In recognition of continuing concerns regarding the visual impacts of the proposed project, additional studies are being conducted and will be included in the Final EIS.

Visual impacts from the Hawaii Belt Highway will be reduced by extensive landscape screening as discussed in the Draft EIS (see Chapter IV, Section 1.8).

Building facilities on the bluff have not been specifically located or exact setback distances determined at this time. Structures, including associated landscaping, on the bluff will protrude above the bluff. In an effort to more clearly portray the mauka views from the shoreline, the revised visual analysis that will be included in the Final EIS will include panoramic view photographs with sketches of the facilities drawn to scale to show the extent of protrusion within the limits of the degree of planning that has occurred to date. That is, because detailed design and siting of the facilities has not been performed to date, the information to be provided in the Final EIS will be for planning purposes and to disclose the potential impacts of protrusion that may occur, not a definitive representation of a specific proposal.

In some instances, fishermen using mauka puu as markers for fishing ko'a will be able to establish new markers such as the new buildings, to locate fishing ko'a.

Based on the surveys conducted for the proposed project, there is no scientific evidence to indicate that fishermen will be adversely affected by the proposed project. There is evidence to indicate that marketing opportunities for fishermen will be increased by the proposed project as a result of new restaurants and shops opening at the Resort as well as those that may open outside the Resort, but in Ka'u.

The total number of hotel/condominium units presently proposed ranges from 740 to 1,035 as described in Chapter I, Section 4. These units would occupy approximately 48 acres of the proposed development area or approximately 11 percent of the total Resort area. This represents a range of 16 to 22 units per acre. Previous proposals included a range of 805 to 1,430 hotel/condominium units on approximately 45 acres, or a density of 18 to 32 units per acre. The proposed change from Low Density to Medium Density is limited to approximately 65 acres mauka of the Belt Highway. The subjective quality of the visual impact of the proposed project will be dependent upon the viewer and upon the actual specific detailed design of development which will only be determined subsequently during land use and building approvals. Previous suggestions by the Ka ohana O Kalae included a zone change to high density mauka of the Belt Highway.

Natural Hazards

Natural hazard mitigative measures are summarized in Chapter IV, Section 1.4.5 of the Draft EIS. Based on research performed by

experienced, qualified geotechnical consultants (see Chapter I, Section 11), subsidence at Punalu'u is not well documented. It appears that the most recent activity (1975) included uplifting of the Punalu'u area, rather than subsidence (see Appendix L). However, as noted in Chapter IV, Section 1.4.5, all structures within the coastal area would be constructed based on prudent, responsible standards and at a minimum adhere to all applicable federal, state and county engineering, design and construction standards and codes. These are acceptable mitigative measures.

Based on information provided by the Hawaii County Fire Department (see Chapter X, page X-22), there have been no deaths as a result of auto accidents, drownings, swimmers in distress or overdue hikers in Ka'u District over the past five years. We do not have any information to indicate that swimmers have drowned, in recent years, at Punalu'u. The County Department of Parks and Recreation does not consider either Punalu'u or Whittington County beaches "safe". We would appreciate any documented information you may be able to provide regarding swimming accidents or deaths at Punalu'u. Plans for the proposed project include erecting signs at the County Beach Park advising people of the unsafe conditions.

The rationale used in your letter for not locating the Resort in the Punalu'u area because of strong currents and wave action is one of the reasons the water play area will be developed on the bluff approximately 1,000 feet from the shoreline. It is also one reason why conflicts between boaters and swimmers are not expected. The development of the water play area is a major undertaking and a very important mitigation measure. Furthermore, under the current Resort Master Plan, the proposed hotel has been moved from its previous location in the coastal area below the bluff to a more inland location on the bluff overlooking the ocean.

Public Shoreline Access

The measures that C. Brewer Properties, Inc. has taken to ensure continued public access to the shoreline and coastal resources of Punalu'u are fully described in Chapter IV, Section 5.1.3 of the Draft EIS. Additional mitigation measures, other than those described, such as the granting of public access easements by C. Brewer Properties, Inc. and the construction of an access road and parking area on the east side of Ninole Cove, are neither warranted or required by law.

As noted in the Draft EIS (Chapter IV, Section 5.1.3), although vehicular access along the shoreline will be restricted, closure of vehicular access to the shoreline area fronting the Resort is expected to result in positive impacts through the protection of wildlife and environmentally sensitive areas. Furthermore, as noted in Chapter II, Section 3.3.2.4, pedestrian access will be unimpeded and a series of shoreline and beach trails would be established to direct public access to those areas that are outside of ecologically sensitive wildlife habitats and provide shoreline access along the entire shoreline. Shoreline fishing would not be restricted. The easements described in the Draft EIS have been agreed to by the State Department and Board of Land and Natural Resources and C. Brewer Properties, Inc. The shoreline and vehicular access parking area east of Ninole Cove are provided in addition to that required by the Board of Land and Natural Resources and enhance residents' and visitors' access to the shoreline.

Remnants of the kerbstone trail east of Ninole Cove were not found during the archaeological surveys conducted for the proposed project (see Chapter IV, Section 3 and Appendix A).

Those portions of Appendix D that refer to the restoration of Ninole Cove continue to be valuable information that will be utilized should appropriate governmental agencies determine that Ninole Cove should be restored.

Draft Environmental Protection Plan

As indicated previously, by agreement between the U.S. National Marine Fisheries Service and C. Brewer Properties, Inc., the Environmental Protection Plan will be finalized at the time SMA and Corps of Engineers permit applications are prepared and submitted. This timing will allow incorporation of specific construction details, thereby enabling the monitoring and mitigation measure elements of the plan to specifically address the proposed actions. The Final Environmental Protection Plan will be subject to the approval of appropriate federal, state and county agencies. The Environmental Protection Plan will be implemented at the time it is finalized.

The Manager of the Environmental Protection Plan will be identified at the time the Final Plan is developed. The initial funding of the Plan will be the responsibility of the developer with eventual responsibility vested in the SeaMountain Community Association.

Community representation in the Environmental Protection Plan will be provided through the terms of Section III of the Draft Environmental Protection Plan.

The Management Area Buffer Zone will be defined at the time the Final Environmental Protection Plan is prepared. Specific building locations have not been determined at this time, thereby precluding the ability to define specific management areas.

Ninole Cove and Pond No. 2 are both owned by the State of Hawaii and not under the control of C. Brewer Properties, Inc. Suggestions regarding restoration of the cove and/or establishment of a Marine Conservation District, are more appropriately directed to the state rather than C. Brewer Properties, Inc.

The enforcement procedures and methods will be described in the Final Plan. Adherence to all applicable federal, state and county environmental protection measures would be the minimum requirements. The applicable rules and regulations generally have penalty clauses. Enforcement, in part, will be through aid and cooperation of government agencies.

The notification period of two weeks is deemed sufficient by appropriate federal agencies.

Historic Sites

Hawaiian place names, to the extent required to identify specific locations, have been used to the extent necessary in the Draft EIS. Where possible additional Hawaiian place names will be added to the Final EIS.

The Cultural Resources Management Plan will be completed at the same time the Environmental Protection Plan is completed, i.e., at the time SMA and Corps of Engineers permit applications are prepared and submitted. (Note: At the request of the State Department of Land and Natural Resources, Historic Sites Section, the name of the Plan will be changed to Historic Sites Management Plan). The Plan will be prepared by the consulting archaeologists as directed by C. Brewer Properties, Inc. with input from appropriate state and county agencies and public groups as requested. The manager and specific protection and preservation methods and funding levels will be defined at that time.

The Cultural Resources Management Plan (Appendix K) and Archaeological Resources section of the EIS (see Chapter IV, Section 3) have been extensively reviewed by the State Department of Land and Natural Resources, Historic Sites Section and County of Hawaii Planning Department and determined to adequately describe the existing conditions, potential impacts and mitigative measures.

The deletion of Ninole Cove restoration from the project, and its location on State property, puts the restoration of Ninole Cove outside of the purview of the Draft EIS. Please see Coastal Resources section of this letter regarding the restoration of Ninole Cove.

The impacts that the proposed project will have on historical and cultural resources and the measures that will be taken to preserve and protect significant historic and archaeological sites are described in the Draft EIS (see Chapter IV, Section 3 and Appendix A, Archaeological Reconnaissance Survey Report).

The methodology for assessing significance is described in Appendix A, Archaeological Reconnaissance Survey Report. The criteria used to define significance is that specified by the State Department of Land and Natural Resources, Historic Sites Section and applicable federal and state rules and regulations. Past construction and development activities at Punalu'u Resort have been performed in accordance with the rules and regulations applicable at the time the work was performed. This includes preservation through recordation, photographs and other acceptable preservation techniques. Sites have been protected or preserved in accordance with applicable rules and regulations.

Native Hawaiian Rights

As noted above, the measures that will be taken to protect and preserve significant archaeological and historical sites are discussed in the Draft EIS (see Chapter IV, Section 3). As presently known, the proposed project will not adversely affect any traditional Hawaiian practices exercised in the project area. The proposed project will not adversely affect traditional fishing, food gathering or religious ceremonies practiced on adjoining properties or along the shoreline. As noted previously, shoreline pedestrian access will be retained to allow residents of the area and visitors the continuing opportunity to utilize the shoreline for fishing, swimming, food gathering, walking, etc.

The proposed project includes plans to replace or supplement marginal shoreline vegetation with native vegetation to the maximum extent possible and protect and preserve that vegetation by restricting vehicles driving in the coastal plain area. Based on the marine surveys, water sample analyses, current studies and literature searches conducted for the proposed project, there is no scientific evidence to suggest that the proposed project would adversely affect coastal pond, nearshore or offshore plants or animals; the measures that will be taken to protect and preserve significant archaeological and historical sites are described in the Draft EIS as noted above; in some instances, where views are affected, fishermen using mauka puu as markers for fishing ko'a will be able to establish new markers such as the new buildings, to locate fishing ko'a.

The plans for the park in the area adjacent to the Bangay parcel all lie on lands owned by C. Brewer Properties, Inc. which were acquired from the Kamehameha Schools/B. P. Bishop Estate. As of this date, C. Brewer Properties, Inc. has not been served with any or has any knowledge of a specified legal claim or cause of action brought by the Bangay Estate regarding the real property proposed for development.

The proposed project will not affect Ninole Stream. Should this condition change in the future, C. Brewer Properties, Inc. would comply with all applicable rules and regulations.

Socioeconomic Impacts

1. Employee Housing Requirements

The estimates of construction and operational phase employee housing requirements included in the Draft EIS (see Chapter IV, Section 4.3.3.2), were developed by experienced, professionals using accepted methods of analyses. The analyses have been re-examined and found to be a thorough and well-researched forecast of future conditions. As noted in the Draft EIS (see pages IV-157 through IV-161), (1) construction employee housing demand would be supplied by units that are developed on-site; short-term rental markets in Ka'u and surrounding areas; and rental markets in Hilo and Kona; and (2) operational employee housing demand would be supplied by existing housing inventory and units that would be constructed as required. Specific housing costs will depend on supply and demand for housing as well as the quality, location and amenities offered. It is probable that short-term rental rates would increase as a result of subsidies received by construction workers.

The existence of urban zoned land does not translate into available housing units. However, it is specifically noted on page IV-161 that "C. Brewer Properties, Inc. intends to use its lands and cause sufficient housing to be developed in the district, as required by the Resort's demands which are not satisfied by alternatives or the development of residential projects by others in the area".

Housing costs and impacts are discussed in Chapter IV, Section 4.3.3.2 of the Draft EIS.

Opinions and statements regarding housing supply and requirements are noted.

2. Housing Affordability

Questions regarding funding for infrastructure improvements appear more appropriately directed to appropriate county agencies. The forecast state and county revenues and expenditures directly resulting from the proposed project are described in Chapter IV, Section 4.2.2.6 of the Draft EIS.

The analysis of housing affordability was based on commonly accepted methods and procedures used by state and county agencies and private, experienced professional analysts. All income groups were considered in the analysis.

3. Increased State and County Tax Revenues

While net tax revenues and benefits exceed projected public expenditures, the primary economic benefits to be accrued from the proposed project are increased economic and job opportunities, not tax revenues.

Questions and opinions regarding the allocation of state and county revenues appear more appropriately addressed to specific state and county agencies and legislative bodies. These questions are a regional and island-wide issue and outside the purview of the Draft EIS for a specific project. The key conclusion here is that the Resort will not be a burden to the county and the state. With a successful resort at Punalu'u, Ka'u will receive more public funding assistance and services than at present due to the presence of the political and economic justification for such assistance.

Recreational Resources

The potential impacts and mitigation measures relative to recreational resources are described in the Draft EIS (see Chapter IV, Section 7). The Draft EIS does not indicate that increased parking will increase shoreline capacity.

Vehicular access across portions of C. Brewer Properties, Inc. owned land will be restricted as will vehicular access across environmentally sensitive coastal areas. This is in keeping with sound environmental protection measures and measures taken by the county, but disregarded by some park and shoreline users. Access to various areas will be provided as discussed in the Draft EIS (see Chapter IV, Section 5.2.1.3). Camping will be limited to the county park.

Other than minor alterations in the access route to the C. Brewer Properties, Inc. owned boat launching ramp, the proposed project would only affect the ramp availability or use if there is a significant increase in users. The text of the Final EIS will disclose this potential situation. Potential conflicts between boaters and swimmers are not expected to occur.

Your comments and opinions regarding recreational resource mitigation measures are noted.

Market Assessment/Project Feasibility

The market assessment and resort feasibility analyses conducted for the Draft EIS were performed by experienced, qualified professionals using accepted methods of analyses. The analyses have been re-reviewed and found to be a thorough and well researched forecast of future conditions. To the extent that new data is available and applicable they will be incorporated into the Final EIS. The need for the proposed Punalu'u Resort project and the absorption of the planned number of units (hotels, condominium, etc.) within the development period has been confirmed by the re-examination of the original analyses as described in Chapter II, Section 3.4.

Information relative and applicable to the proposed Hawaiian Riviera project will be included in the Final EIS. While both Punalu'u and the Hawaiian Riviera are considered viable resort and residential communities, they represent considerably different concepts, and thus both could be supportable within the district. The major differences between the two resort concepts are: Hawaiian Riviera is considerably larger than Punalu'u and is proposed as a major resort, whereas Punalu'u is a minor resort;

Punalu'u is conceptually planned as a "village" development where the focus would consist of commercial, residential and recreational elements mixed in a town center. Hawaiian Riviera would seek to create a high activity, high density atmosphere focused on two ocean-front hotels, a large marina and a surrounding commercial and entertainment complex. The resort area would be served with its own air field and include a complete support village.

Without the "critical mass" of facilities and amenities, potential visitors to Punalu'u are more likely to choose other resorts to visit. Therefore, for Punalu'u Resort to be economically viable and provide an increase in job and economic opportunities for the residents of Ka'u, it must contain the necessary diversity and quantities of facilities and amenities on-site to meet the needs of guests and residents.

Fiscal Impact Analysis

Your comments and opinions regarding visitor industry trends and wage disposition are noted.

Discussions regarding ownership of travel circuits used by current package tours does not appear to be relevant, significant or valid with regard to the proposed project. It is possible that firms specializing in hotel or resort operations would be contracted to handle day to day operations and/or ownership. In the event that another entity joined with or replaced C. Brewer Properties, Inc., all conditions placed on the property would apply to that entity.

The fiscal impact analysis included in the Draft EIS (see Chapter IV, Section 4.2.2.6) includes forecast county expenditures for solid waste disposal, development of affordable housing, school costs and all other infrastructural elements generally provided by state or county governments.

Alternatives

The alternatives discussion included in Chapter III of the Draft EIS has been prepared in accordance with EIS rules and regulations. Those rules require that the possible alternatives be evaluated in terms of meeting the project objectives. The alternatives described in your letter do not meet the project objectives. Comments regarding the establishment of a Marine Conservation District at Punalu'u are more appropriately addressed to the State Department of Land and Natural Resources. As noted above and in the Draft EIS (see Chapter IV, Sections 2.1 through 2.5.6) the marine resources, habitat and biota of the Punalu'u area are not unique to the island or State of Hawaii.

Ka ohana O Kalae
PUNALU'U RESORT DRAFT EIS
March 4, 1988
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Regional Planning Issues

Comments concerning whether a proposed project is appropriate for a particular site can be more appropriately addressed at agency public hearings for the pertinent land use and zoning permits.

Future resort expansion beyond that which is presently proposed is not planned. Should future expansions appear to be justified, they would be the subject of separate environmental impact documents as required at that time.

Punalu'u Resort exists now in both a regulatory and physical sense and, therefore, will not alter the island-wide mix of existing or planned resorts. The economic viability and marketing of Punalu'u Resort relative to other existing or planned resorts on the island, is discussed in Chapter II, Section 3.4.

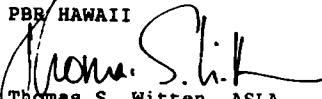
Closing Comments

The measures proposed to mitigate potential adverse environmental impacts are summarized in Chapter I, Section 6 and in numerous sections in Chapter IV as required by applicable EIS rules and regulations.

Thank you for your comments and participating in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBB/HAWAII


Thomas S. Witten, ASLA
Principal

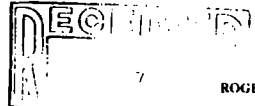
cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



**DEPARTMENT OF BUSINESS
AND ECONOMIC DEVELOPMENT**

KAMAMALU BUILDING, 250 SOUTH KING ST., HONOLULU, HAWAII
MAILING ADDRESS: P.O. BOX 219, HONOLULU, HAWAII 96801 TELE: 743226 HDPED

January 21, 1988



JOHN WAIHEE
GOVERNOR
ROGER A. ULVELING
DIRECTOR
MURRAY E. TOWILL
DEPUTY DIRECTOR
BARBARA KIM STANTON
DEPUTY DIRECTOR

The Honorable Albert Lono Lyman
Page 2
January 21, 1988

The Honorable Albert Lono Lyman
Planning Director
Planning Department
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Subject: Draft Environmental Impact Statement (DEIS), Punalu'u
Resort, Punalu'u, Ka'u, Hawai'i

We have reviewed the subject document and offer the following
comments.

1. Need for the Project

Based on the market analysis, we question the immediate demand for additional hotel units on the island. The final Environmental Impact Statement (EIS) should address this issue in more detail. We point out that there are substantial acreages of land on the island which have the potential for resort development and, similar to Punalu'u, these lands are already in the urban land use district. The development potential far exceeds the projected inventory of hotel rooms listed on page II-38 of the draft EIS. On the assumption that the demand for such units is limited, the factors which make the subject Punalu'u project more desirable and achievable should be identified.

The final EIS should also identify the factors affecting the viability of the subject project. Special mention should be made of the other large resort proposal in Ka'u, the Hawaiian Riviera Resort.

2. Work force

The numbers of employees required by the proposed resort projects, including the subject project, will necessitate the importation of additional workers. The impacts of the resultant importation on public services, programs, and housing, and on the ability of this particular resort to fill all positions should be identified.

3. Critical Mass and Implications for adjacent lands

The final EIS should discuss the likelihood of the subject project to develop the critical mass necessary to be economically viable. If additional development may be required, the nature of that development--its optimum size, uses, functions, and probable location--should be identified. In assessing the cumulative and long-term impact of this project, the implications for uses of adjacent lands should be identified.

4. Space Launching Facility

The final EIS should fully explore the potential impacts and interrelationships of this resort area on the development potential of space-related facilities in the Ka'u District and vice versa. The Ka'u District remains relatively undeveloped and offers the best potential for a launching facility and certain other space-related activities in the State. According to recent studies on the subject, the district is well suited for a launching facility capable of making both polar and equatorial launches and is relatively free of conflicting land uses. A linkup between space and our existing skills in tourism has also been discussed. Creation of a space-theme park on the Big Island may be possible in the same environment where the moon-bound astronauts took part in their training. Ground support facilities for future space-related industries should be carefully planned to minimize conflicts with existing communities and environmental issues.

5. Traffic Impacts

The final EIS should address the degree to which the existing highway system can accommodate the traffic from the subject project and from other traffic-generating developments.

We appreciate this opportunity to provide comments.

Sincerely,

ORIGINAL SIGNED BY
ROGER A. ULVELING

Roger A. Ulveling

cc: Mr. Thomas S. Witten, PBR-Hawaii

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February 5, 1988

State of Hawaii
Department of Business and Economic Development
P.O. Box 2359
Honolulu, Hawaii 96804

Attention: Roger A. Ulveling,
Director

SUBJECT: PUNALU'U RESORT DRAFT EIS


Dear Mr. Ulveling:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 18, 1988

State of Hawaii
Department of Business and
Economic Development
P.O. Box 2359
Honolulu, Hawaii 96804

Attention: Mr. Roger A. Ulveling,
Director

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Ulveling:

Thank you for the copy of your letter of January 21, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS. The following is provided in response to your letter.

1. Need for the Project

To fully respond to your questions regarding need for the project we have asked our marketing and economic analysis consultant, Peat Marwick Main & Co. to provide a detailed response. Their response is attached.

In brief, the analyses performed addressed the market support for the Punalu'u Resort project over a twenty-year development period, based on identified historical and known current trends. The analyses indicated that while the market could be temporarily over supplied in the early 1990's, a net additional demand for about 3,000 to 7,000 units in addition to the currently planned hotels on the Big Island is projected by 2005, as is shown in Table II-14 of the Draft EIS.

In both a regulatory and physical sense, Punalu'u Resort is now an existing resort area complete with 18-hole golf course, restaurant and condominium facilities. Punalu'u's relative isolation offers and will continue to offer residential and recreational opportunities in an environment of open space, privacy and seclusion.

2. Work Force

To fully disclose the potential impacts of increased population and immigrants of workers to fill Punalu'u Resort as well as other planned or proposed Big Island resorts, as described in Chapter IV, Section 4.2.2.3, a labor supply versus labor demand scenario was developed. Based on this scenario, it was estimated that the Punalu'u Resort would require the need to import (through immigration or involuntary commuting) a total of between approximately 480 to 890 additional workers. From this analysis, in addition to that which was performed to determine the numbers of construction workers that would be required, estimates of potential impacts on public services and facilities were made. As described in Chapter IV, Sections 6.1 through 7: (1) the proposed project would result in an increase in school enrollment of between approximately 100 to 190 students and, based on information provided by the State Department of Education, present schools are operating at close to capacity thereby creating a condition in which additional school facilities might be required at some time in the future; (2) existing healthcare facilities are adequate to handle the forecast increase in population; (3) existing or planned expansion of county fire and police protection services, in conjunction with those that would be provided by the Resort, are adequate to handle the forecast increase in population; and (4) existing and/or planned expansion of county recreational facilities, in conjunction with those that would be provided by the proposed project are adequate to handle the forecast increase in population levels. Further, as noted in Chapter IV, Section 4.3, the sociological impacts of the proposed project, including those related to housing requirements for construction and operational employees, housing opportunities in Ka'u and housing affordability, have been discussed and mitigation measures developed for potential adverse impacts. The analyses conducted also include a fiscal impact analysis which concludes that the expected state and county revenues of the proposed project at project completion will be greater than anticipated public expenditure requirements.

As noted in the Draft EIS (see pages IV-157 through IV-161), (1) construction employee housing demand would be supplied by units that are developed on-site; short-term rental markets in Ka'u and surrounding areas; and rental markets in Hilo and Kona; and (2) operational employee housing demand would be supplied by existing housing inventory and units that would be constructed as

required. Specific housing costs will depend on supply and demand for housing as well as the quality, location and amenities offered. It is probable that short-term rental rates would increase as a result of subsidies received by construction workers.

Although the existence of urban zoned land does not translate into available housing units, it is specifically noted on page IV-161 that "C. Brewer Properties, Inc. intends to use its lands and cause sufficient housing to be developed in the district, as required by the Resort's demands which are not satisfied by alternatives or the development of residential projects by others in the area".

The ability of the resort to fill all positions seems clear in the Labor Demand versus Supply scenario that was developed for the Draft EIS. As shown in Table IV-23, it is projected that there will be a need for immigrants or involuntary commuters, to fill all of the resort job positions.

3. Critical Mass and Implications for Adjacent Lands

With respect to resorts, "critical mass" is a concept that refers to the strength of a given destination's market presence. Although critical mass can be supported by large numbers of visitor units, it is not dependent on such volume. Thus, smaller retreat destinations, such as Kapalua Resort, Kona Village, Hana Ranch and the Mauna Kea Beach Hotel have long been recognized as having a strong and viable market presence in the specialty niches they serve.

Punalu'u is proposed to be developed as a minor resort destination with the appropriate number of hotel, condominium and residential units plus commercial activities, golf course, restaurants and other amenities to provide the resort guests and visitors the mix of services and amenities on-site that they are seeking. Punalu'u is expected to be a viable resort and residential community and continue to provide cultural and recreational assets to Ka'u District and East Hawaii.

At present, C. Brewer Properties, Inc. knows of no specific plans for the properties adjacent to Punalu'u Resort. These lands are owned by others and are outside the control of C. Brewer Properties, Inc.

Mr. Roger A. Ulveling
PUNALU'U RESORT DRAFT EIS
March 18, 1988
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4. Space Launching Facility

To the extent that information was available at the time the Draft EIS was published, C. Brewer's regional development plans, including a potential space launching facility, were discussed in Chapter II, Section 3 of the Draft EIS.

Since that time, additional information has been developed in the form of the Arthur D. Little reports on the potential for space-related activities and preliminary siting studies for a possible space launching facility. It is noted that in late 1986, C. Brewer & Co., Ltd. offered 500 acres of land for the development of a space launching facility and that subsequently the state has taken a more active role in the promotion of such a facility. Upon review of the Arthur D. Little reports it is evident that the potential relationship between a space launch facility and the proposed project are difficult to assess due to the preliminary nature of the space launch facility information at this time. Assuming the space launch facility is located in Ka'u, the proposed Resort project could supply a portion of the permanent and temporary housing required by such a facility and the Resort could supply a portion of the cultural and social amenities that employees and visitors to a space launch facility might seek. However, until more detailed information is available regarding the space launch facility, only these generalized types of statements can be made regarding the possible interrelationship of the two projects.

Similarly, the proposed Resort project could provide hotel rooms and visitor accommodations to visitors and employees of a space theme park. A space theme park could have an impact on the employment needs of the proposed Resort, if it were located in Ka'u and if it were constructed over the same time period as the proposed Resort project. An evaluation of potential physical impacts, i.e., blast zones, noise and air quality, etc. of a space launch facility on the Resort and vice versa is not possible at this time due to the lack of specificity regarding the possible location of the space launch facility. Also, the potential social and economic impacts or interrelationships of a space launch facility and the proposed Resort project are not possible to describe at this time without more detail regarding the space launch facility and the characteristics of the type and size of the facility.

Mr. Roger A. Ulveling
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 5

In view of the above, we are unable to fully explore and discuss the potential impacts and interrelationships of the proposed Punalu'u Resort project in the Ka'u area with a possible space-related facility that might be located in Ka'u. C. Brewer Properties, Inc. fully recognizes that a space launch facility in Ka'u could have significant impacts on the proposed Punalu'u Resort project and that these impacts could be both positive and negative. As such, we would appreciate being provided information related to the proposed space launch facility as it becomes available and request to be a consulted party during any EIS process that may be initiated for the proposed space-related facilities.

5. Traffic Impacts

Based on the information available at the time the Draft EIS was published, the potential traffic-related impacts of the proposed project were discussed in Chapter IV, Section 5.1. Additional information that is now available, including potential traffic related to the proposed Hawaiian Riviera project, will be included in the Final EIS. Based on preliminary results of the analyses being performed, it appears that the present highway system is capable of handling the forecast increases in traffic that would be generated by the proposed project and the proposed Hawaiian Riviera project.

Thank you for your comments and participating in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Mr. Brendan G. Moynahan
March 1, 1988
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March 1, 1988

Mr. Brendan G. Moynahan
C. Brewer Properties
745 Fort Street, Suite 1700
Honolulu, Hawaii 96805

Ref: Punalu'u Resort Draft Environmental Impact Statement dated December 1987 (DEIS)

Dear Mr. Moynahan:

As you requested, this letter responds to issues raised by Mr. Roger A. Ulveling, Director of the State Department of Business and Economic Development, in his letter dated January 21, 1988, to Mr. Albert Lono Lyman, Director of the Hawaii County Department of Planning, regarding the Punalu'u Resort DEIS. Specifically, the sections below respond to the issues raised related to the need for the project, its characteristics with respect to the proposed Hawaiian Riviera Resort area, and its ability to constitute a "critical mass" of resort development.

NEED FOR THE PROJECT

The referenced letter questions the "immediate" demand for additional hotel units on the island and the factors that could make Punalu'u an unique and viable resort. Our study addressed the market support for the project over a twenty-year development period, based on identified historical and known current trends. As in any projection, future events may vary from those projected, especially in short-term, year-to-year fluctuations. Our assessment represents our expectation of the long term direction and scope of future levels of visitor industry development and activity on the island, based on historical and current trends and our industry experience.

The issues of the island-wide and Punalu'u Resort market support for hotel development are addressed more specifically in the subsections below.

Island-Wide Demand for Hotel Units

Our market study estimates that hotel room requirements on the island will number about 6,000 to 8,000 rooms by 1990, and 11,400 to 15,200 rooms by 2005, with the wide variation dependent on prevalent and acceptable future island-wide occupancy rates, as illustrated in Table II-13 of the DEIS. In February 1987 there were 5,226 hotel rooms on the island, according to the

Hawaii Visitors Bureau. Projects for which firm development plans and major state and county land use approvals exist would add about 3,000 more units by 1992, as also discussed in the DEIS (page II-38). Thus, while the market could be temporarily over supplied in the early 1990's, a net additional demand for about 3,000 to 7,000 units in addition to the currently planned hotels on the island is projected by 2005, as shown in the DEIS, Table II-14.

Some of these required additional units may be developed on other lands for which county and/or state land use approvals already exist. Development capacities amount to 4,500 hotel units at areas, including Punalu'u, that already have the major required state and county land use approvals, infrastructure and resort amenities in place, as shown in the attached Exhibit A. Other projects, where infrastructure would first have to be developed, could accommodate up to 1,950 more hotel units at areas with state and county approvals, and up to 1,200 at areas that currently have county General Plan approval only. In addition, two other resort areas are petitioning for consideration of up to 3,600 hotel units, as also shown in the Exhibit. Development periods for the latter two projects could extend beyond 2005.

However, obtainment of the required land use approvals is not certain, and once obtained does not ensure the completion of hotel projects at the ultimate densities or within the time frames originally proposed.

Thus from a planning standpoint, "zoned capacities" must generally exceed what is required for development in any given time frame. Reasons for the typically lesser levels of actual hotel development as compared to zoned capacity include the following:

- Flexibility required to meet market demand - Constant qualitative fluctuations in market demand, requiring that hotel parcels be approved for densities or unit capacities that permit a variety of development concepts.
- Factors affecting supply - Unforeseeable circumstances, including general economic conditions, affecting developers' ability to obtain financing, to secure purchasers of hotel-zoned lots, to attract appropriate operators and to complete the construction of hotel projects within their targeted time frames.
- Recent development density trends - Related to the above, the recent trend of hotel and other resort-related developers in Hawaii to build at densities significantly below those permitted by existing zoning.

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~~XXXX~~ Peat Marwick

Mr. Brendan G. Moynahan
March 1, 1988
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Market Support for Development at Punalu'u

In addition to the generally positive outlook for hotel development on the island, development at Punalu'u Resort in particular is considered supportable and desirable within the next 15 to 20 years. First, the potential supply of additionally needed hotel units on the island noted in Exhibit A include about 1,000 units at Punalu'u Resort, for which State Land Use and County General Plan approvals already exist.

Secondly, Peat Marwick's market study for the Punalu'u Resort, incorporated in the DEIS, projected support for 600 to 1,400 hotel units at Punalu'u by 2005, dependent on prevalent and acceptable island-wide occupancy rates (see Table II-14). At an island-wide rate of about 70% occupancy, 1,000 hotel units were estimated to be supportable at Punalu'u by 2005, as explained in the DEIS. The current C. Brewer projection in the DEIS is in line with this projected demand, with plans for 500 to 635 hotel and 240 to 400 hotel/condominium visitor units.

Punalu'u Market Position

Punalu'u is now an existing, operating resort. Already in place is much of the necessary infrastructure and facilities, including roads and a sewer and water company. The existing Resort features an 18-hole golf course and clubhouse, restaurant and related commercial/exhibition areas, multifamily condominiums and single-family development. In addition, Punalu'u already has Hawaii State Land Use and County General Plan approvals and considerable Hawaii County zoning for the new developments proposed.

Punalu'u is located along the coastal drive to the Volcano area from Kona, and is one of the principal developments and recreational attractions along this route. It is seen as a more rural and lower density resort than others on the island. Compared to the existing and proposed South Kohala and North Kona resort developments, Punalu'u's relative isolation offers and will continue to offer residential and recreational opportunities in an environment of open space, privacy and seclusion.

Rather than being primarily beach-oriented, Punalu'u, with its extensive public beach park and open shoreline areas would feature greater opportunities to view and practice traditional local shoreline activities such as fishing, limu-gathering, swimming, picnicking, and surfing.

COMPARISON TO THE HAWAIIAN RIVIERA RESORT

In reference to the viability of Punalu'u, Mr. Ulveling's letter also asked for a discussion of the proposed Hawaiian Riviera Resort complex, which would also

~~XXXX~~ Peat Marwick

Mr. Brendan G. Moynahan
March 1, 1988
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be located in Ka'u. Punalu'u and the Hawaiian Riviera are considered viable and complementary resort and residential communities that represent considerably different development concepts. Thus both could be supportable within the district. Principal differences are summarized as follows:

- Land area - The Hawaiian Riviera would include two resort areas, the Hawaiian Palace Resort and the Hawaii Ka'u Aina Resort, on a 2,344 acre site. The Punalu'u project area is about 433 acres, net of the already developed components.
- Climate - Punalu'u is located in a relatively lush, tropical setting whereas the Hawaiian Riviera area is generally hotter and drier.
- Distance - The Ka'u district is about 25% larger than the island of Oahu, so that distances between locations within it can be significant. By car, Punalu'u would be about 20 miles from the entrance to the two resort areas of the Hawaiian Riviera, or 25 to 30 minutes away. Thus, the two resort areas would be about as far from one another as are Kihei and Lahaina on the island of Maui.
- Scale of development - Punalu'u is planned to remain an intermediate resort destination, with 2,051 to 2,981 new units to be added to the existing facilities. New development would include up to 1,035 visitor units, 1,868 multifamily residential units, and 78 residential lots, as shown in Exhibit B. Punalu'u may also include about 65,000 square feet of gross leasable commercial area.

The Hawaiian Riviera Resort is proposed to become a major resort destination on the island, with 3,000 visitor-designated, and 927 resident-oriented units, as also shown in Exhibit B. The Hawaiian Riviera would also include 160,000 square feet of gross leasable commercial area at the two resort areas, and be associated with an 800-acre, 800-unit support community and a 100-acre regional airport.

- Resort focus and development concept - Punalu'u is conceived as a "village" development where the focus would consist of commercial, residential and recreational elements mixed in a town center located on a bluff overlooking the ocean and two shoreline golf holes.

In contrast, the Hawaiian Palace Resort could create a high activity Mediterranean town atmosphere, focused on its two oceanfront resort hotels, a 400-slip marina, and a surrounding commercial and entertainment complex. The Hawaii Ka'u Aina Resort, also at the Hawaiian Riviera, is planned as a low density beach resort, with activity focused on the three oceanfront hotels near to and to the northeast of Pohue Bay. Hawaii Ka'u Aina Resort would also feature two large petroglyph parks located on the oceanfront.

~~Peat Marwick~~ Peat Marwick

Mr. Brendan G. Moynahan
March 1, 1988
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- o Impacts and benefits - Punalu'u is located between South Point and Volcano on the southeastern coast of the island, whereas the Hawaiian Riviera Resort is located on the south-southwestern coast of the island, 20 or more miles away. Thus, compared to the Hawaiian Riviera Resort, Punalu'u is expected to relate more to East Hawaii in terms of its economic and fiscal impacts and benefits.

In summary, while the Hawaiian Riviera could be known for the cosmopolitan marina/commercial complex of the Hawaiian Palace Resort, and the oceanfront hotels and petroglyph parks of the Hawaii Ka'u Aina Resort, Punalu'u could continue to be known for its natural lava shoreline, its black sand beach, and its integration of traditional local shorelines uses in a resort and residential setting.

The future relationship of Punalu'u and the Hawaiian Riviera would be unprecedented in the State. However, their relative development and market masses may be compared to that of the KaaNapali Beach and Kapalua resorts. Like KaaNapali, the Hawaiian Riviera could serve a broad mix of market segments with many types of facilities and amenities. Like Kapalua, Punalu'u could cater to a specialized market niche, consisting of repeat or other visitors to the island who seek a more rural, retreat vacation or residential atmosphere with the key amenities and comforts of a larger resort.

CRITICAL MASS

With respect to resorts, "critical mass" is a concept that refers to the strength of a given destination's market presence. Although critical mass can be supported by large numbers of visitor units, it is not dependent on such volume. Thus smaller retreat destinations such as Kapalua Resort, Kona Village, Hana Ranch, and the Mauna Kea Beach Hotel have long been recognized as having a strong and viable market presence in the specialty niches they serve.

As explained above, Punalu'u is proposed to be developed as an intermediate resort destination with 500 to 635 resort hotel units, 240 to 400 hotel/condominium units, 1,240 to 1,868 multifamily residential units, and 71 to 78 residential lots. As explained in the DEIS, Punalu'u is expected to be a viable resort and residential community, and a cultural and recreational asset to the Ka'u district and to East Hawaii. While there would be indirect economic opportunities associated with its development, Punalu'u has been planned as a self-contained resort, recreational and residential community.

* * * * *

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~~Peat Marwick~~ Peat Marwick

Mr. Brendan G. Moynahan
March 1, 1988
6

Thank you for this opportunity to comment on these issues. Please call me or Mr. Malcolm Tom, partner in charge of the Management Consulting Department of Peat Marwick's Honolulu office, if you have any further questions.

Very truly yours,

PEAT MARWICK MAIN & CO.


Ann M. Bouslog
Manager

AMB:egj
Enc.

cc: Tom Witten, PBR Hawaii
Endre Mott-Smith, C. Brewer Properties
Gordon Chapman, (c/o PBR Hawaii)

Exhibit A

Exhibit B

Master-Planned Long Term Proposed Hotel Development
on the Island of Hawaii
by State and County Approval Status

(Proposed to 2005)

Comparison of Planned Developments
at the Hawaiian Riviera Resort
and at Punalu'u Resort

	Number of units (1)	Location
Infrastructure/Major Approvals in Place(2):		
Mauna Lani	600	South Kohala
Waikoloa	1,200	South Kohala
Keauhou	1,700	North Kona
Punalu'u	1,000(3)	Ka'u
Total	<u>4,500</u>	
Infrastructure Planned: Major Approvals in Place(2):		
Kukio Beach Resort	1,250	North Kona
Kohanaiki	700	North Kona
Total	<u>1,950</u>	
County General Plan Approval Obtained:		
Awake'e	600	North Kona
O'oma	600	North Kona
Total	<u>1,200</u>	
Other:(4)		
Hawaiian Riviera	2,100(5)	Ka'u
Mahukona	1,500	North Kohala
Total	<u>3,600</u>	

	Visitor-designated units Hotel	Other(1)	Subtotal	Resident units(2)	Total
Hawaiian Riviera Resort:(3)					
Hawaiian Palace	1,275	225	1,500	727	2,227
Hawaii Ka'u Aina	<u>1,200</u>	<u>300</u>	<u>1,500</u>	<u>200</u>	<u>1,700</u>
Total	<u>2,475</u>	<u>525</u>	<u>3,000</u>	<u>927</u>	<u>3,927</u>
Punalu'u Resort(4)					
	<u>635</u>	<u>400</u>	<u>1,035</u>	<u>1,496</u>	<u>2,981</u>

(1) Includes single- and multifamily units at the Hawaiian Riviera Resort; hotel/condominium units at Punalu'u Resort.

(2) Includes both single- and multifamily units at both areas that are designated as resident-oriented. However, some units could be placed in transient visitor use.

(3) Belt Collins & Associates, "Hawaiian Riviera Resort: Final Environmental Impact Statement," December 1987, Page II-8.

(4) Maximum proposed development, as shown in PBR Hawaii, "Punalu'u Resort: Draft Environmental Impact Statement," December 1987, Page I-4.

(1) Maximum units planned for development by 2005, as shown on County Planning Department listings, and/or in filed Impact Statements or other published documents. Excludes those for which firm development plans exist, such as the Ritz-Carlton Mauna Lani, the Hyatt Regency Waikoloa, the Princess Hotel, the South Kohala Resort Hotel, and the Sheraton Royal Waikoloa expansion.

(2) With the State Land Use and County General Plan approvals in place as of January 1988.

(3) Unit count based on Hawaii County records; current petition is for 500 to 635 hotel and 200 to 400 hotel/condominium visitor units.

(4) Currently petitioning for required State or County approvals; development plans may extend beyond 2005.

(5) Total proposed for both the Hawaiian Palace and the Hawaii Ka'u Aina resorts at the Hawaiian Riviera Resort complex.



PLANNING DEPARTMENT

25 AUPUNI STREET • HILO, HAWAII 96720
(808) 961-6286

COUNTY OF
HAWAII

RECEIVED
JAN 25 1988
PHILLIPS
DANTE K. CARPENTER
Mayor
ALBERT LONO LYMAN
Director
TIM LUI-KWAN
Deputy Director

January 22, 1988

Mr. Thomas S. Witten
PBR - Hawaii
130 Merchant St., Suite 1111
Honolulu, HI 96813

Dear Mr. Witten:

Comments - Punalu'u Draft EIS

We have reviewed the subject draft EIS (DEIS) and provide the following comments:

Shoreline Access

The DEIS states that a new shoreline access road and parking area would be constructed on the east side of Ninole Cove to allow direct access to the shoreline. The parking area appears to be situated within the State Land Use Conservation District. However, it is difficult to determine whether said area is located within State-owned property and/or the 40-foot shoreline setback area. If said proposed parking area is located within either of the above, then relocation and/or a shoreline setback variance would have to be applied for.

Old Government Road and Trails

In regards to the disposition of the Old Government Road and Old Government Trail, it is unclear as to whether the conditions imposed by the Board of Land and Natural Resources on July 28, 1972, have been met. Specifically, we note that, under the land board's agenda Item F-6, recommendation C.1 requires, "Prior completion of the planned subdivision roads and acceptance by the County of Hawaii by dedication as public roads". Furthermore, recommendation D.1 subjects approval of the disposition to the above condition. However, we further note that none of the planned subdivision roadway for the subject properties including those roads over which the proposed public right-of-way to be located have either been completed by the developer or accepted by the County of Hawaii for dedication as public roads.

Mr. Thomas S. Witten
January 25, 1988
Page 2

The quitclaim deeds describe those portions which run in an east-west direction from the southwestern boundary of the Punalu'u Beach Park to Ninole Cove.

It is further unclear as to the disposition of the Old Government Road and Old Government Trail over and across the Punalu'u Beach Park property described as R.P. 6885, L.C. Aw. 7715, Apana 15.

Flooding

As portions of the proposed development area lie in historically flooded areas, the influence of flooding on the project site and effects the project development upon the nature of drainage and potential flooding should be elaborated and clarified. For example, existing ocean-drainage culverts for storm waters are proposed to be abandoned and replaced by catch basins, which may overflow during heavy storms (pp. IV-9, IV-11, Appendix E-3, Figure IV-5). The catch basins locations need to be shown on a legible contour map and the paths of drainage water into and out of them should be more clearly and completely shown, along with drainage flow volumes. The DEIS provides size measurements (but no capacities) for only some of the catch basins; this data needs to be supplemented. An additional map illustrating present drainage conditions, water paths and volumes, and constructed features should be provided in order to evaluate flooding impacts of the project. The storm drainage not directed into Ninole Stream is particularly unclear. Also, the matter of suspended sediments should be further addressed.

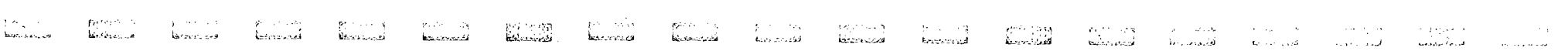
More discussion also should be directed towards flooding in the portions of the project mauka of the Belt Highway, inasmuch as Appendix E (pg. E-7) predicts that larger floods might inundate a 300-foot segment of the Belt Highway and portions of the existing Kalana I subdivision. Specific mitigation measures proposed to alleviate those problems should be incorporated and the implications of the highway flooding should be discussed.

Wastewater

Since wastewater processing requires the upslope pumping to the treatment plant, the final EIS should further discuss the impacts of wastewater conveyance/disposal during power outages of extended durations. It should further address measures to be taken to mitigate or prevent flood damage to the present and expanded wastewater treatment plant facilities.

The final EIS should assess the impacts of impounded irrigation wastewater during prolonged periods of rainy weather when irrigation is not necessary. At fully developed levels, the number of days storage for treated sewage needs to be compared with lengths of wet periods where no irrigation is needed.

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Mr. Thomas S. Witten
January 25, 1988
Page 3

Water Quality

Water sample analysis is provided for the seven pond, spring and ocean locations for September 2, 1986. We note that the analysis appears based on a one-time sampling. The final EIS should address the reliability of such sampling, particularly in light of such elevated levels of reported nitrogen and phosphorus compounds. The final EIS should also estimate projected concentrations of nitrogen and phosphorus compounds at future rates of sewage effluent irrigation in addition to the cited September 2, 1986, figures at current rates of use. The bases for certain assumptions, such as attributing the nitrate portion of these excesses to nitrogen-fixing trees in the uplands, needs to be provided in the text by reference to the source.

Similarly, the DEIS identifies increased nutrient loading of pond waters due to irrigation with anticipated levels of sewage effluent as an impact (p. IV-61), but concludes that there will be no adverse effects on the physical environment of the ponds. Further discussion may be necessary to support this assessment, as well as the impacts of such nutrient levels on their biological communities. We note that "natural flushing" with groundwater bearing elevated levels of nitrogen and phosphorus, may not be an effective mechanism to reduce the concentration of these compounds in the water. The ecological consequences of sewage effluent irrigation on pond and coastal biological communities should be included as an unresolved issue.

Views

The County General Plan identifies Ninole Cove and Punalu'u Black Sand Beach as examples of the County's natural beauty which should be safeguarded. Moreover, the coastal scenic view-plane presently offers an unobstructed "up valley" view from the Punalu'u Park mauka to the Ninole Hills (lava-infilled valleys). These vistas provide an aesthetic resource for both residents and visitors which should be considered in the DEIS. The final EIS should illustrate this view both in its present and proposed configurations in assessing the project's impact on the coastal-scenic view plane.

Geologic Hazards

While the DEIS identifies hazards from tsunamis resulting from locally-generated earthquakes, such as occurred in 1868 (southwest Mauna Loa) and 1975 (southeast Kilauea), it should be noted that such tsunamis can be substantial and without warning. It was unclear whether the DEIS had considered other mitigative measures in discussing the hazard, including siting all major development structures above the run-up line.

Mr. Thomas S. Witten
January 25, 1988
Page 4


While the DEIS points out that the Punalu'u-Ninole area lies on relatively old lava flows, we note that a portion of the 1950 Mauna Loa flow descended from about 10,500 feet elevation to 3,800 feet elevation immediately upslope of Punalu'u, in the headwaters of Ninole Stream.

General Comments

References that need to be corrected:

Page I-1	Proposed General Plan Amendment and rezoning should be Figures II-11 and II-13 rather than II-14 and II-15.
Page I-3	Table II-1 is on Page II-4 rather than II-8.
Page I-8	Coastal Ponds on Figures IV-14 rather than IV-16.
Page I-9	Vegetation Zones on Figure IV-13 rather than IV-15.
Page IV-187	Public Shoreline Easements on Figure IV-21 rather than IV-4.
Figure IV-14	Coastal Pond Survey Labeling of Pond 1 and Dry Mauka Pond is reversed.
Figure IV-21	Public Shoreline Easements. Does not reflect the areas covered by the two Quitclaim Deeds as stated on Page IV-187 and IV-188. Purposes of Easements C and E are inconsistent as stated on Page IV-189.

Sincerely,


ALBERT LONO LYMAN
Planning Director

AK:aeb

February 5, 1988

County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Attention: Albert Lono Lyman,
Planning Director

SUBJECT: PUNALU'U RESORT DRAFT EIS

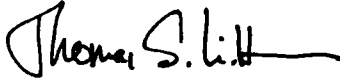
Dear Mr. Lyman:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 18, 1988

County of Hawaii
Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Attention: Mr. Albert Lono Lyman,
Planning Director

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Lyman:

The following is provided in response to your letter of January 25, 1988 regarding the subject Draft EIS.

1. Shoreline Access

A portion of the new access road and all of the new parking area proposed for the Ninole Cove area lies within the State Land Use Conservation District. A Conservation District Use Application (CDUA) will be filed with the Board and Department of Land and Natural Resources prior to commencement of any work on these elements of the proposed project. This information will be clarified further in the Final EIS.

2. Old Government Road and Trails

Per our discussions during our meetings on January 28, February 12 and February 26, 1988, information relative to the Old Government Road and Trails will be clarified in the Final EIS. As indicated in our discussions, the State Department of Land and Natural Resources (DLNR) has waived the requirement regarding acceptance by the County of Hawaii by dedication as public roads. Copies of the correspondence between DLNR and C. Brewer Properties, Inc. were provided to

your department on February 26, 1988. The substance of the correspondence will be included in the Final EIS per the marked-up pages provided to your department on February 26, 1988. Also, information relative to the quitclaim deeds and the disposition of a remnant portion of the Old Government Trail over and across Punalu'u Beach Park will be further clarified in the Final EIS as shown on the marked-up pages provided to your department on February 26, 1988.

3. Flooding

Per your letter of January 22, 1988, as shown in the marked-up pages provided to your department on February 26, 1988, additional information will be added to the Final EIS regarding potential flooding hazards and zones. Further, the Flood and Drainage study included in the Draft EIS will be revised to include additional information and a clear drawing indicating the location of catchment basins. Drainage paths also will be included in the report and reproduced in the text of the Final EIS. The report will also address the issue of suspended sediments resulting from flood waters and their effect on the catchment basins.

Also per your letter, additional information relative to the potential impacts of flooding on the Resort mauka of and on the Hawaii Belt Highway will be included in the Final EIS. As is noted in the Draft EIS (see Chapter IV, Section 1.4.3.2), a 100-year flood will overtop the state highway on the Pahala side of Ninole Stream at the low point in the road.

4. Wastewater

As noted in our discussions on January 28, 1988, Chapter IV, Section 6.6.2 of the Draft EIS already contains the information requested regarding measures that would be taken to mitigate or prevent flood damage to the present and expanded wastewater treatment plant facilities.

Per your letter of January 22, 1988, the Final EIS will contain information relative to the disposal of wastewater during periods of prolonged rainfall, as shown in the

marked-up pages provided to your department on February 26, 1988. The treated wastewater would be stored in retention basins in the golf course and/or continue to be used to irrigate the golf course during the rainy periods.

5. Water Quality

Per your letter, the Final EIS will contain information relative to the baseline value of one-time sampling versus multiple sampling; additional information relative to the concentrations of nutrients; and additional information relative to the sources of nutrients in groundwaters. The above noted EIS revisions and additions are shown in the marked-up pages provided to your department on February 26, 1988.

Also, per your letter, we have re-examined the Draft EIS discussion on nutrient loading and potential ecological consequences of that loading due to the use of treated sewage effluent for golf course irrigation. Additional information regarding this matter will be included in the Final EIS as shown in the above noted mark-up.

6. Views

Per your January 22, 1988 letter and our discussions on January 28 and February 12, 1988, a new "Views" study is being conducted and will be included in the Final EIS. Appropriate mitigation measures, as developed during the new study, will be included in the Final EIS. The "new" Visual Attributes section of the Final EIS was provided to your department on March 4, 1988.

7. Geologic Hazards

The information regarding geologic hazards and mitigation measures requested in your letter of January 22, 1988 will be included in the Final EIS and is shown on the marked-up pages provided to your department. Questions raised during our meetings on January 28 and February 12, 1988 regarding natural hazards (subsidence associated with Mauna Loa seismic activity) have either already been addressed in the Draft EIS or will be added to as required in the Final EIS.

Mr. Albert Lono Lyman
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 4

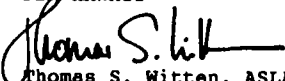
8. General Comments

The references noted in your January 22, 1988 letter as requiring correction, will be corrected in the Final EIS. We apologize for any inconvenience these oversights may have caused.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

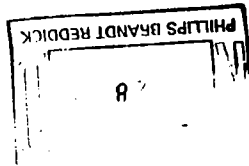
Sincerely,

PBR, HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Planning Dept.
County of Hawai'i
25 Aupuni St.
Hilo, HI 96720
Planning Director
A. Lono Lyman



Jan. 19, 1988

Dear Sir,

My words fall short in describing the immense beauty and wealth of nature that the county and indeed the whole state stands to lose with this proposed mammoth development of C.Brewer properties.

As you know there is grave concern for the impact of any development upon the shoreline's fragile basal spring condition which inconsequence affects the endangered sealife as well as the gathering and fishing resources of the people. Punalu'u area is really the people's only accessible beach in Ka'u and the residents as well as Volcano people rely on this area to supply their tables.

Many feel that because Punalu'u has always been in the red for C.Brewer that they only want to build to sell. There shows no real commitment to the area but only in a sense of money returned on an investment. Because historically C.Brewer has bitten off more than it can chew its digestion (direction) is faulty. If they were really committed to the beauty and serenity of the area, which they proprot to be, then they would develop tastefully within the balance of the enviornment and lifestyle of the people who live here.

I hope the county would encourage the DLNR's efforts in the restoration of Ninole Spring and Puhau Pond not only for conservaton purposes but also for a sense of public pride in returning a beautiful, historic natural resource to the community as well as the public at large. I concur with the DLNR's recommendation for the Ninole Spring and pond areas to be named a Marine Life Conservation District. However, Punalu'u Bay and surrounding shoreline should remain open for the people's tables.

Already there shows a deterioration of the seaweeds along the coastline and a new species of liverwort in the now stagnant pond named Kawale. This shows that the existing land use needs to be mitigated for pollutants occurring in the basal spring waters. How can we allow further development of this fragile and priceless coastline?

What is the status of the old government road that runs from Ninole to Punalu'u? The public continues to use this old right of way and should be able to continue!

Also the new plan shows no makai access for the old church. Doesn't the church own this property and have the right to continue its access as public domain? And how can C.Brewer cut through private property and propose to give this to the county?! Do they

2.

Planning Dept. comment on Punalu'u EIS cont,d

realize they will be disrupting old burial caves on either side of the existing road that they propose to change?

May the planning process proceed with caution at this time of vast change and shifting priorities. Shouldn't we be thinking in terms of perserving historic and enviornmentally unique and precious resources and of keeping or acquiring open recreational space for public use? Even tourist agree that Punalu'u is a special place that should be perserved in her natural habitat as Majestic Ka'u describes.

Sincerely,

Linda Lyerly

P.O.Box 673

Na'alehu, HI 96772

c.c. Hugh Clark - H.A.

Charles Streck - DLNR

Pele Hanoa - P.P.C.

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February 5, 1988

Ms. Linda Lyerly
P.O. Box 673
Na'alehu, Hawaii 96772

Attention: Linda Lyerly

SUBJECT: PUNALU'U RESORT DRAFT EIS

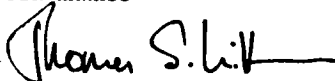
Dear Ms. Lyerly:

This is to acknowledge receipt of your letter of January 19, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 3, 1988

Ms. Linda Lyerly
P.O. Box 673
Na'alehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Lyerly:

The following is provided in response to your letter of January 19, 1988 to Mr. A. Lono Lyman, Planning Director, County of Hawaii Planning Department regarding the subject Draft EIS.

We agree that Punalu'u is a beautiful location for all of the residents of and visitors to Hawaii to enjoy. The beauty of Punalu'u, which C. Brewer Properties, Inc. is committed to retain, is one of the attributes of the proposed project that will aid in assuring the economic viability of the proposed project.

Based on the marine surveys, water sample analyses and water current studies conducted for the proposed project, scientific evidence to suggest that the proposed project will have a significant adverse impact on the coastal pond, nearshore or offshore waters or brackish or marine life inhabiting those waters does not exist.

Additionally, pedestrian access to swimming, fishing and food gathering locations will be retained under the proposed project. As noted in the Draft EIS (Chapter IV, Section 5.1.3), although vehicular access along the shoreline will be restricted, closure of vehicular access to the shoreline area fronting the Resort is expected to result in positive impacts through the protection of wildlife and environmentally sensitive areas. Furthermore, as noted in Chapter II, Section 3.3.2.4, pedestrian access will be unimpeded and a series of shoreline and beach trails would be established to direct public access to those areas that are outside of ecologically sensitive wildlife habitats and provide

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Ms. Linda Lyerly
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

shoreline access along the entire shoreline. Shoreline fishing would not be restricted. The easements described in the Draft EIS have been agreed to by the State Department and Board of Land and Natural Resources and C. Brewer Properties, Inc. The shoreline and vehicular access parking area east of Ninole Cove are provided in addition to that required by the Board of Land and Natural Resources and enhance residents' and visitors' access to the shoreline.

C. Brewer Company is one of the oldest companies in Hawaii and has been an integral part of the Ka'u District for over 100 years, providing jobs, economic advancement, recreational facilities, housing and a sense of "community" to the Pahala and Na'alehu area residents. The company's commitment to the area is evidenced by this presence and will be retained through development of Punalu'u Resort. The proposed project has been and will continue to be designed to be complementary to the area environment and lifestyle of not only the people currently residing in the area but also those who will live in the area.

C. Brewer Properties, Inc. maintains the position that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. We would be pleased to work with the State Department of Land and Natural Resources, or any other interested agency, in the planning and restoration of the cove. As far as we can ascertain, there is no recommendation by the Department of Land and Natural Resources to declare the Ninole Spring and pond areas as a Marine Conservation District but would probably support such a declaration. As discussed previously, Punalu'u Bay and surrounding shoreline will remain open under the proposed project.

Based on the marine surveys, water sample analyses and current studies conducted for the proposed project, there is no scientific evidence to suggest that present resort operations are causing or will cause the "deterioration" of seaweeds or coastal pond water quality. It appears that improper harvesting of seaweeds and other organisms and heavy fishing pressure, along with natural forces such as strong waves, may be a cause of depleted stocks of such organisms if those stocks are reduced in number.

The status of the Old Government Road and Trails is discussed in the Draft EIS (see Chapter IV, Section 5.1.3).

We agree that there is a lack of beaches in the Ka'u District and point out that the County Department of Parks and Recreation does not consider either Whittington or Punalu'u County beaches to be

Ms. Linda Lyerly
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 3

"safe". The proposed project includes plans to improve the recreational facilities at Punalu'u County Beach Park and to continue pedestrian access to coastal swimming, fishing and food gathering locations that are on public lands.

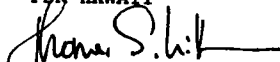
C. Brewer Properties, Inc. has been and will continue to work with the owners (Hawaii Conference Foundation) of the church regarding access to the church (Henry Opukaha'ia Memorial Chapel and Cemetery) and has reached tentative agreement regarding those matters.

Significant archaeological and historical sites will be protected and preserved in compliance with appropriate federal, state and county rules and regulations.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBH HAWAII

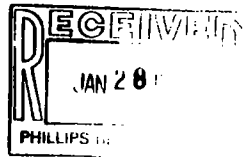


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

1504 Wailuku Dr.
Hilo, HI 96720
14 Jan 88

Planning Commission
c/o Planning Dept.
25 Auunui St
Hilo, HI 96720



Gentle men:

I have read the EIS of Brewer's Seaview
Punaluu master plan. There is no change in their
determined closure of the Court. Beach Road.

Our house lot 9-6-1-8 would be cut off
from access by roadway. To be denied legal
entry to your house lot is not the American
way.

We, Margaret L. Carmichael and Cecil
S. Carmichael, therefore oppose any and all
so called improvements to the Brewer's master
plan for Punaluu Seaview - Hale.

Very truly yours

Cecil S. Carmichael

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Cecil S. Carmichael
1504 Wailuku Drive
Hilo, Hawaii 96720

Attention: Cecil S. Carmichael

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Carmichael:

This is to acknowledge receipt of your letter of January 14, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

March 3, 1988

Mr. Cecil S. Carmichael
1504 Wailuku Drive
Hilo, Hawaii 96720

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Carmichael:

The following is provided in response to your letter of January 14, 1988 to the Planning Commission, c/o Planning Department, County of Hawaii regarding the subject Draft EIS.

As discussed in Chapter IV, Section 5.1.2.1 and as shown in Figures IV-18 and IV-19 of the Draft EIS, vehicular access to the Punalu'u Beach Park and to your lot (TMK 9-6-1:08) is currently provided by the county portion of Punalu'u Road that runs mauka of the black sand beach and makai of the private property parcels near the Black Sand Restaurant. The proposed project will not affect access to your house lot.

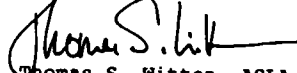
As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Mr. Cecil S. Carmichael
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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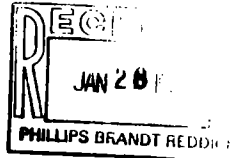
JOHN WAIHEE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF SOCIAL SERVICES AND HOUSING
P. O. Box 339
Honolulu, Hawaii 96809

January 12, 1988

WINONA E. RUBIN
DIRECTOR
HAROLD FALK
DEPUTY DIRECTOR
ALFRED K. SUGA
DEPUTY DIRECTOR



Mr. Albert L. Lyman, Director
County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Subject: Draft Environmental Impact Statement (EIS)
for Punalu'u Resort, Ka'u District, Hawaii

Thank you for the opportunity to review the subject EIS.
The Housing Finance and Development Corporation will be
responding with our joint concerns.

Sincerely,

Winona E. Rubin
WINONA E. RUBIN

PBR
HAWAII LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

State of Hawaii
Department of Social Services and Housing
P.O. Box 339
Honolulu, Hawaii 96809

Attention: Winona E. Rubin,
Director

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Rubin:

This is to acknowledge receipt of your letter of January 12, 1988
regarding review of the subject Draft EIS. A detailed response
to the issues and questions you have raised is being prepared and
will be forwarded to you within the next few weeks. A copy of
this letter, your letter and the detailed response letter will be
appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813
TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402
HONOLULU TRAVEL DENVER

January 19, 1988

Mr. Albert L. Lyman, Director
County of Hawaii Planning Department
25 Aupuni Street
Hilo, Hawaii'i 96720

SUBJECT: Draft EIS for Punalu'u Resort
Ka'u Hawaii'i

Dear Mr. Lyman:

I have several comments to make in regards to the EIS for Punalu'u.

Recreational

1. There is lack of beaches with safe swimming area in the District of Ka'u. The black sand beach at Punalu'u is the only easily accessible swimming area, which is heavily used. Punalu'u to Ninole shoreline is also heavily used by the community, for family gathering, children wading in the ponds, over night camping and picnicking. Shoreline fisherman used the area every day as part of their lifestyle, for diving, throwing net, pole fishing, gathering of limus and opihi to provide their family home with food, a basic resource in their lifestyle.

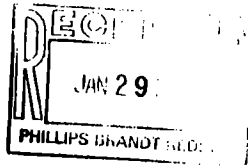
Government Road and Trail

2. Removal of the present old government road and trail from Punalu'u to Ninole, which the people of Hawaii have vested right to use, have been partly destroyed when C. Brewer had built the Golf Course in 1972. This government beach trail including vehicular, provide access along the shoreline and historic sites which is not addressed in the EIS.

It was never in the History of Punalu'u-Ninole that these government road was ever been abandoned. To relocate golf holes No. 8 and 9 should not be allow. The local people have to walk a long and uncomfortable distance to get to the beach, and only when the tide is low.

Realignment of the County's Punalu'u road mauka 800 feet behind the top of the central bluff that is going through the Bangay Estate. The 7th generation of the Bangay family are still occupying these property since 1850 L.C.AW.

The Bangay family survived two major tsunamis and several hurricanes, and rebuild their home.



Mr. Albert L. Lyman
page 2
January 19, 1988

Historic sites

3. Punalu'u and Ninole a place of historic and cultural significance known through out the history of Ka'u. Information and access to this area should be mention in the EIS.
 1. Hokuloa church - now the chapel of Henry Opukahaia.
 2. The active cemetery must be kept open at all times for burials.
 3. Punahaha Point (gathering of limus).
 4. Laupapaohua (gathering of limus and ohuas during seasonal.
 5. 'Ili'ili hanau o koloa
 6. Paliki flat.
 7. Spring ponds of puhau and kauwale, puhau should be restored to its original pond, so the ocean water could get into kauwale pond. These ponds should be providing natural spawning of shoreholes and mullets.
 8. La'e loa flat. Puhau pond and La'e Loa flat were formerly the habitat for a number of Hawaiian waterbirds that are rarely seen today. The koa'e kea, the Hawaiian duck (koloa), kolea, aku'u and a'eo (stilt). Those waterbirds were there prior to the development of the present golf course. Perhaps it should be pointed out at this time that the flash flood which occurred in the '80s creating a filled of the puhau pond, most probably occurred as a result of the tremendous runoff created by the changes in riparian environment introduced by the applicant when it built the golf course and made other changes upstream and dumping of gravel by the truck load.
 9. Ninole beach is a sandy area for swimming.
 10. Pa'ala
 11. Ka'ie'ie Heiau
 12. House sites
 13. Canoe shed with platform
 14. Ko'a (altar)
 15. Burial cave in Ninole
 16. Fishing ground of kuhua
 17. Ke'eku Heiau
 18. Kawa bay
- The County and State should encourage the establishment of the Ninole springs region as a recreation area.

Bare Coastline

4. The coastline from Punalu'u, Ninole, Kuhua and Kawa is having some kind of chemical contamination that is causing the limus and ha'uke'uke to disappear. The endangered species, the green turtle and hawksbill turtle depends on the limu for survival.

Mr. Albert L. Lyman
page 3
January 19, 1988

Natural Beauty

5. Silhouetted against the verdant Pu'us of Enuhe, Makanau, Pakua, Kaiholena and majestic Mauna Loa overlooking the blue pacific ocean. On the bluff stands Hokuloa church, now it is the chapel of Henry Opukahala.

But what's unique is amidst this chapel are our Kupunas resting place with head stones dating back to the 1800s left untouched resting peacefully in this nurturing place if mind, soul and spirit.

To have a Hotel built next to this nurturing place of mind. C. Brewer is mentally unbalanced. The souls and spirits are there.

What good is government if it can't provide for the recreational needs of its people.

While the population is growing the beaches are not, and are gradually being lost instead to development.

February 5, 1988

Pele Hanoa
P.O. Box 472
Naalehu, Hawaii 96772

Attention: Pele Hanoa

SUBJECT: PUNALU'U RESORT DRAFT EIS

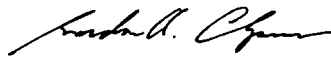
Dear Ms. Hanoa:

This is to acknowledge receipt of your letter of January 19, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

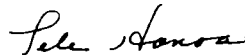
Sincerely,

PBR HAWAII


for Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Sincerely,



Pele Hanoa
P. O. Box 472
Naalehu Hi. 96772

March 3, 1988

Ms. Pele Hanoa
c/o Native Hawaiian Legal Corporation
1164 Bishop Street, Suite 900
Honolulu, Hawaii 96813

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Hanoa:

The following is provided in response to your letter of January 19, 1988 to Mr. Albert L. Lyman, Director, County of Hawaii Planning Department regarding the subject Draft EIS.

1. Recreational

We agree that there is a lack of beaches in the Ka'u District. We would like to point out that the County Department of Parks and Recreation does not consider the beach areas at Punalu'u to be safe for swimming. The proposed project includes plans to improve the recreational facilities at the county beach park and to continue public access to coastal swimming, fishing and food gathering locations that are on public lands.

As noted in the Draft EIS (Chapter IV, Section 5.1.3), although vehicular access along the shoreline will be restricted, closure of vehicular access to the shoreline area fronting the Resort is expected to result in positive impacts through the protection of wildlife and environmentally sensitive areas. Furthermore, as noted in Chapter II, Section 3.3.2.4, pedestrian access will be unimpeded and a series of shoreline and beach trails would be established to direct public access to those areas that are outside of ecologically sensitive wildlife habitats and provide shoreline access along the entire shoreline. Shoreline fishing would not be restricted. The easements described in the Draft EIS have been agreed to by the State Department and Board of Land and Natural Resources and C. Brewer Properties, Inc. The shoreline and vehicular access parking area east of Ninole Cove are provided in addition to that required by the Board of Land and Natural Resources and enhance residents' and visitors' access to the shoreline.

Ms. Pele Hanoa
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

2. Government Road and Trail

C. Brewer Properties, Inc., by agreement with the State Department of Land and Natural Resources, will retain public access to the coastal areas of Punalu'u. Vehicular access will be restricted to paved roadways and a new roadway and parking area to be constructed near Ninole Cove and pedestrian access along the shoreline will be preserved. The relocation of golf holes No. 8 and 9 will not eliminate pedestrian access to coastal fishing areas.

The proposed realignment of Punalu'u Road is behind the top of the central bluff and on private property.

3. Historic Sites

The historical, archaeological and cultural significance of the Punalu'u area is fully described in Appendix A (Full Archaeological Reconnaissance Survey) of the Draft EIS. We are grateful to you for the contributions you made to this report and the assistance provided to our archaeological survey team.

With regard to the restoration of Ninole Cove, the restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the complex and costly permitting requirements; and the property is under the ownership of the State and, therefore, conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered their assistance to the State Department of Land and Natural Resources and other agencies that may be interested in the restoration of the cove.

We also believe that the improvements to be made to the golf course and coastal ponds will encourage endangered and threatened Hawaiian water birds to once again use the area as feeding and resting sites. Appropriate state and federal agencies have agreed with the environmental and archaeological sites protection measures to be employed at the Resort.

4. Bare Coastline

Based on the marine surveys, water sample analyses and current studies conducted for the proposed project, there is no scientific evidence to suggest that Resort operations are or will

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Ms. Pele Hanoa
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 3

adversely affect the coastal pond, nearshore or offshore waters of Punalu'u. Improper limu, fish and shellfish harvesting methods and natural actions such as strong waves, are the probable cause of varying amounts of limu. The presence of green turtles in Punalu'u Harbor tends to indicate that food supplies (seaweeds) are still available to the turtles.

5. Natural Beauty

We agree that Punalu'u is naturally beautiful and wish to share that beauty with all of Hawaii.

C. Brewer Properties, Inc. has been and will continue to work with the owners (Hawaii Conference Foundation) of Henry Opukaha'ia Memorial Chapel and Cemetery to maintain and enhance the beauty of the chapel. The owners of the chapel and cemetery and C. Brewer Properties, Inc. have reached tentative agreement regarding preservation and protection of the chapel and the proposed project.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

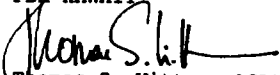
As noted previously, the recreational facilities at Punalu'u will be improved and enhanced for the residents of Ka'u and visitors to the area.

Ms. Pele Hanoa
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 4

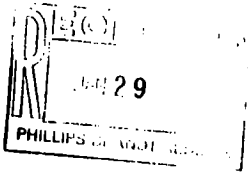
Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBE HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



January 20, 1988

Albert Lyman
County Planning Dept.
25 Aupuni st.
Hilo, Hawai'i 96720

Re: Environmental Impact Statement

The following concerns, which are listed below, are concerns which are inadequately addressed in the Environmental Impact Statement.

Kuleana lands

In the proposed development aimed at Punalu'u, I realize that they are claiming lands belonging to my family. The Bangay Estate seems to be used as part of the recreational area for the relocation of the county park. No consent or purchase of our property has ever been achieved by C. Brewer, so in fact, for C. Brewer to even consider the use and ownership of our property would be a fabrication until we legally settle this quiet title search. In past years C. Brewer has offered to purchase the Kuleana lands belonging to my family, the Bangays. There offer to purchase our property was immediately refused with a definite NO! but, very consistently as you may see within the proposed draft of the Environmental Impact Statement, they still have the idea our property belongs to them. This poses as a very big problem, with their proposals, due to the fact that these Kuleana lands do not legally belong to C. Brewer. And legal action will have to be taken in order to resolve this problem with the quiet title before any type of development can be considered.

Environmental concerns

The survival of the Hawaiian green sea turtle, and the hawks bill sea turtle, will be threatened with extinction if such a development is approved.

1. An increase of pollution to breeding areas, and coastal shoreline.
2. Overpopulation of tourists, which will cause a threat to nesting grounds in the immediate area of the black sand beach.
3. Noticeable depletion on the food resources along the shoreline, due to the large use of pesticides and herbicides by the resort, for golf course maintenance and up keeping of the restaurant grounds.

4. A tragic disruption to the fragile ecosystems by changes to its natural environment. The marine life and plant life is very unique to this area. The loss of many Hawaiian plants are threatened by this development.

Punalu'u is used as a subsistence food resource by the community when they're wages do not meet with the rising cost of inflation.

Water shortage to the area is very possible due to the water shortage we experience now in this area.

The water quality will decline and the possibility of contamination to wells which are located in private properties are a concern. Due to the fact that area is very porous and the recycling of the water which comes from the sewage plant is heavily used to water the golf course. It poses as a great threat. It will seep into air wells in which water is gathered for bathing and drinking purposes.

Historical sites

The possible destruction of the famous 'ili 'ili hanau o kola (birthplace of the pebbles, which is found no place in the world. But unique only to this area).

The ko'a (fishing markers) still in use today by local fishermen, are threatened by destruction if they get the approval for the relocation of the Loop road.

The petroglyphs face destruction if this development is approved due to the relocation of the golf holes.

Native Rights

Infringement on religious practices by native Hawaiians of the area.

A loss of gathering rights due to the limited access provided by this development.

The consent from which needs to be acquired from the resort in order to use a coastline access is denying out rights to the coastline as well as the coastline access below the high water mark.

This development also denys native Hawaiians to freely use the old trails through the ahupua'a (ancient land division from the mountain to the sea).

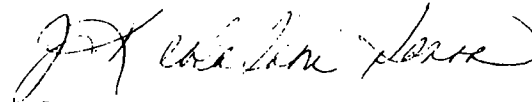
Punalu'u is frequently used as an educational resource by schools throughout the state. I have taken numerous secondary schools through Punalu'u's unique coastline. I have also escorted the University of Hawaii's Hawaiian studies classes, geography classes, archeology classes, and numerous groups of professionals from all over United States, to share our culture and rich history in which Punalu'u offers to all. There is no class room learning material which can be found in a store which has more to offer than Punalu'u. Its a great value as a educational resource and is very important in further study of Hawaii's people. So often we forget what it was that made people flock to these islands which made these islands unique anywhere else in the world. To approve this development you would be destroying knowledge and history off the face of these islands, and from the minds of our children, yes children!, so often you hear "save the children!", but how about saving the education that will be stolen from our children by the mighty dollar!! Jobs, yes this development will offer some jobs of such a low caliber. The people of Ka'u will not be guaranteed high paying office jobs, most likely only low paying maintenance jobs and menial food service jobs will be offered. Is this what you want to see your children doing?. Is this the great opportunity the developers offer the people of Ka'u?. To wait on tourists for the rest of their lives?. Many of the people who live here in Ka'u support this development, they have only lived here, they have seen nothing but Hawaii, so they really don't appreciate what they have untill they lost it!, but then it's too late. With the large numbers of resorts already being built, why do we need another one? its the only easily accessable beach within the whale district!! you are asking the people of Ka'u to give up alot for concrete buildings. C. Brewer doesn't need another resort to sell to foriegn investors, but needs to give back to the people who has made C. Brewer what it is today. Alternaties for land use of this area is a very good and simple, such as:

1. Marine and wildlife conservation area to be used as a research area for educational institutions studying endangered species and their natural habitats, also to use as an educational resource for futher study of Hawaii's people.
2. Donate or purchase by the state or county agency as a recreational park for the enjoyment of both residents of state of Hawaii and tourists.

So with this mana'o that I have shared with you county planners I urge you to deny the granting of the S.M.A. permit to C. Brewer. And help to save what little we have of what used to be Hawaii, and to give the community of Ka'u a better deal.

UA MAU KE EA I KA AINA I NA 'OPIO!

MALAMA KA AINA



J. Keolalani Hanoa
P.O. BOX 323
VOLCANO, HI. 96785

February 5, 1988

J. Keolalani Hanoa
P.O. Box 323
Volcano, Hawaii 96785

Attention: Malama Ka Aina

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Hanoa:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 3, 1988

J. Keolalani Hanoa
P.O. Box 323
Volcano, Hawaii 96785

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Hanoa:

The following is provided in response to your letter of January 20, 1988 to Mr. Albert Lyman, County Planning Department regarding the subject Draft EIS.

Kuleana Lands

The lands on which the proposed park expansion is planned are owned by C. Brewer Properties, Inc. As of the date of this response, C. Brewer Properties, Inc. has not been served with or has any knowledge of a specified legal claim or cause of action brought by the Bangay Estate regarding the real property proposed for development of the Punalu'u Resort project.

Environmental Concerns

Based on the literature searches, marine surveys, water sample analyses and current studies performed for the proposed project, scientific evidence to indicating that the proposed project would adversely affect either the green or hawksbill turtles does not exist.

1. Based on the marine surveys and water sample analyses performed for the proposed project, scientific evidence to indicate that the coastal ponds, nearshore waters or offshore waters of Punalu'u are presently or in the future would be polluted as a result of the proposed project given the environmental protection measures currently in force and those that would be placed into effect through implementation of the Environmental Protection Plan as described in the Draft EIS (see Appendix H), does not exist.

2. As described in the Draft EIS (see Chapter IV, Sections 2.3.2.2, 2.3.2.3 and 7.3) specific measures will be taken to ensure that the nesting areas of the hawksbill turtle are protected. These measures include the closure of vehicular traffic along the shoreline, shielding lights that might shine on the shoreline and establishing a public educational awareness program as part of the Resort Environmental Protection Plan.

As noted in Section 2.3.2.2, it is possible that increased human usage (of the shoreline areas) would have a positive effect if accompanied with increased educational programs and public awareness. The educational programs and public awareness programs are part of the Environmental Protection Program to be put into effect.

3. Based on the marine surveys and water sample analyses performed for the proposed project, scientific evidence to suggest that there has been any decrease in the quantities of limu, shellfish or fin fish in the coastal ponds, nearshore or offshore waters of Punalu'u as a result of Resort operations does not exist. However, there is evidence of over fishing and improper harvesting methods.
4. The terrestrial and aquatic plant and animal life in the Punalu'u area is typical of other similar areas in Hawaii. During the botanical, avifauna and marine surveys conducted for the proposed project, no endangered or threatened species of plants or animals other than the green turtle were observed in the area. It is known that the area serves as a temporary resting and feeding place for some endangered and threatened species of birds (Hawaiian stilt, Hawaiian duck, possibly the Hawaiian owl and Hawaiian hawk), but none were observed during the surveys conducted for the Draft EIS.

The proposed project will not prevent people from using the shoreline and offshore areas as food gathering locations. Adequate pedestrian access as described in Chapter IV, Section 5.1.3, would continue to be provided to all shoreline areas.

Water for the proposed project will continue to be drawn from wells located on the project property and will not affect other wells or water supplies.

Based on the water sampling analyses and literature surveys conducted for the proposed project, scientific evidence to indicate that the water quality of the coastal ponds,

nearshore waters or offshore waters will be adversely affected by the proposed project does not exist. Based on water samples analyzed by the State Department of Health, the present practice of using treated sewage effluent for golf course irrigation purposes, does not adversely affect the health and safety of people swimming in the waters offshore of Punalu'u.

Historical Sites

As described in the Draft EIS (see Chapter IV, Section 3, Appendix A and Appendix K), significant archaeological and historical sites will be protected and preserved in keeping with C. Brewer Properties, Inc. commitment to these resources as recommended by its own consulting archaeologist and, at a minimum, in accordance with all applicable federal, state and county rules and regulations. In addition, C. Brewer Properties, Inc. has been and will continue to have discussions with adjacent land owners (the State of Hawaii and Kamehameha Schools/Bishop Estate) regarding their future plans for sites on their lands and the possible incorporation of preservation and educational programs that would interact with those planned for the proposed project.

Native Rights

The proposed project will not infringe on present religious practices by native Hawaiians. Pedestrian access to all sites presently used for these types of practices will continue to be provided and, in some cases, vehicular access also will be provided.

The proposed project will not adversely affect gathering rights or deny pedestrian access to coastal swimming, fishing or gathering locations. Pedestrian access to all shoreline areas and waters below the high water mark will be retained under the proposed project.

By agreement between the State Department and Board of Land and Natural Resources, public access easements to beach and coastal areas of Punalu'u have been granted and will be preserved for public use.

Through implementation of the Environmental Protection Plan (see Appendix H of Draft EIS) and the establishment of trails and interpretive displays, the Punalu'u coastal and archaeological resources would continue to be an educational tool available to

Ms. J. Keolalani Hanoa
PUNALU'U RESORT DRAFT EIS,
March 3, 1988
Page 4

residents of the area, the state and visitors to the area. As noted in the Draft EIS (see Chapter IV, Section 2.4.4), the establishment of interpretive displays are expected to provide additional measures to assure that the coastal resources are protected and preserved.

As noted in the Draft EIS (see Chapter II, Section 3.2), specific objectives of the proposed project are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community. The types of jobs that will be available to the people of Ka'u will be commensurate with each individual's skills, knowledge, training and willingness to work. C. Brewer Properties, Inc. will continue to work with appropriate private and public agencies to assure that job training and educational programs are made known to the people of Ka'u.

The economic viability of the proposed project is fully described in Chapter II, Section 3.4 of the Draft EIS. As described, the proposed project is expected to be absorbed into the Big Island market during the development period.

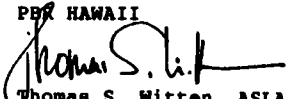
The known feasible alternatives to the proposed project are described in Chapter III of the Draft EIS. The concept of a recreational park for the entire area and/or marine and wildlife conservation area do not meet the project objectives. As such, these alternatives are not considered feasible by C. Brewer Properties, Inc.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Ms. J. Keolalani Hanoa
PUNALU'U RESORT DRAFT EIS,
March 3, 1988
Page 5

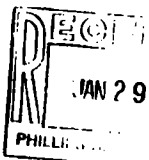
Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Nelle M. Rupley
P.O. Box 280
Pahala, Hawaii 96777



Jan 22, 1973

Mr. Albert Tom Lymen
Planning Director
25 Waipuna St
Hale, HI 96720

Dear Mr. Lymen:

As a member of the silent majority
of Kona residents, I believe it
is time to express my hopes
for a successful conclusion
to C Brewer's plans for the
expansion of Seamount Resort.

Kona is leading in need of an
economic rejuvenation. Too
many of our young people
leave to find jobs elsewhere.

These are the other things I would
like to see done by the developer.

Both during construction
and after completion, jobs
will be available for local
people, some at the resort
and others on the support
structure. When construction
starts, those still in school
will be encouraged to continue
and to prepare themselves for
higher level jobs.

I do not fear that the
resort will destroy the
peaceful beauty of Kona.
As long as we have a
taken to insure access
to the boat ramp to the

PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

Nelle M. Rupley
P.O. Box 280
Pahala, Hawaii 96777

Attention: Nelle M. Rupley

SUBJECT: PUNALU'U RESORT DRAFT EIS

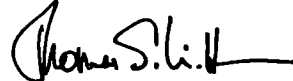
Dear Ms. Rupley:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

*Punaluu Black Sand Beach
and the other
beach, I believe that
most of the people have
the opportunity for growth*

*I am a homeowner who
has lived in Kala for
nearly six years and
in the state for ten*

*Sincerely yours,
Nelle M. Rupley*

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PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

March 3, 1988

Ms. Nelle M. Rupley
P.O. Box 280
Pahala, Hawaii 96777

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Rupley:

The following is provided in response to your letter of January 22, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS.

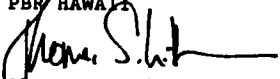
Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

The proposed project is being planned to be an integral part of the beauty of Punalu'u. Access to the boat ramp, coastal resources and church and cemetery will be maintained for the benefit and enjoyment of the residents of the area as well as visitors to the Resort.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR/HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402

HONOLULU IRVINE DENVER

PBR
HAWAII

LANDSCAPE ARCHITECTURE

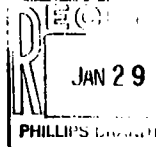
PLANNING

ENVIRONMENTAL STUDIES

Inuanali 22, 1988

Hale Kauanoë
box 33 525 West Lanikaula st.
Hilo HI

96720



February 5, 1988

Katherine R. Grace
Hale Kauanoë
P.O. Box 33
525 West Lanikaula Street
Hilo, Hawaii 96720

Attention: Katherine R. Grace

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Grace:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

To Whom It May Concern:

I, Pu'uwaialoha Grace, am greatly concerned by the intent of people like C. Brewer and the Big Five. Ever since they have come to our beloved Mo'opunā they have tried and gotten away with the destruction of much of our beautiful lands.

When I found out about the intent of the destruction of yet another one of our precious beaches with yet another cement edifice, I cannot help but feel anger and frustration that our so called representatives of the people do nothing to preserve the land. Therefore we, the Hawaiian people must step forward and make a stand, for we are the Maka'ainana. We must continue the traditions, cultures and preserve our lands.

I am currently a student at the University of Hawai'i at Hilo. I choose this University because I know that they have a solid program in Hawaiian Studies. My main intent is to become well versed in the ways of the language, dance, and culture. This will allow me to pass on my gained knowledge to the keiki of Hawai'i. This will also insure that there will always be concerned Hawaiians. Therefore there will always be people to fight for the land and the ocean. The reason I am pointing out to you these facts is so that you will be able to clearly see that there are many concerned groups as well as individuals who are willing to fight for what is truly theirs.

We, the people of Hawai'i, will find a way to make ourselves be heard. We will do whatever it takes to hold onto our lands. The reasons for this is because from the land we were able to survive, it gave to us we gave to it. We are truly one with the land and it one with us. Therefore when men with dollar signs in their eyes come and try to see how much money they can make by using words like "progress", to cover up their greedy intent, we will naturally stand up to them and fight for everything we are worth. It is our land and ocean you wish to rape. If God wanted the land to, like a bunch of hotels and space-ports he would have created them like that.

I hope after carefully pursuing this and all the other letters you have received, you will come to realize that if you go ahead and try to destroy Punalu'u you will not succeed. We, the true people of Hawai'i, will win in the end.

Sincerely,

Katherine R. Grace

XII - 149

March 3, 1988

Ms. Katherine R. Grace
Hale Kauanoa
P.O. Box 33
525 West Lanikaula Street
Hilo, Hawaii 97720

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Grace:

The following is provided in response to your letter of January 22, 1988 regarding the subject Draft EIS.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII

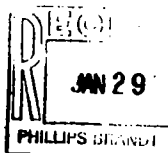

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402

HONOLULU IRVING DENVER



P.O. Box 188
Pahala, Hawaii
96777

January 20, 1988

PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

MarkKatheryn A. Brooks
P.O. Box 188
Pahala, Hawaii 96777

Attention: MarkKatheryn A. Brooks

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Brooks:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Albert Lono Lyman
Planning Director
County of Hawaii

Dear Sir:

For some time now I have been aware of and concerned about the controversy due to the planned development at Punaluu. I would like to take this time to express my support for the C. Brewer Plan to further develop this area.

I have been a resident of Ka'u for twenty years, raised six children here, and worked in the community for fifteen of those twenty years. My children attended both the Naalehu Elementary School and Ka'u High School and at the present time NONE of them are residing in Ka'u. I feel that the development at Punaluu would certainly enhance future opportunities for the youth of our community. I know that many of our young people would prefer to stay in Ka'u but feel that the opportunities here are decidedly limited. I realize, of course, that everyone does not want to work in a resort development, but they don't necessarily want to be farmers or work in the sugar industry either.

I have studied the Plan and considered the objections that have been put forth and feel that C. Brewer has more than adequately answered any possible objections to the development.

As an added comment--I can remember when I first came to Ka'u, what the area around looked like. The roads to the beach areas were difficult at best. The mauka view consisted mostly of Haole Koa and Morning Glory. There were no restaurants to enjoy. All of today's improvements that we take for granted today were put there by C. Brewer.

Thank you for your time and concern.

Yours truly,

MarkKatheryn A. Brooks

cc: C. Brewer Properties
Hawaii Tribune Herald

March 3, 1988

Ms. MarKatheryn A. Brooks
P.O. Box 188
Pahala, Hawaii 96777

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Brooks:

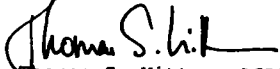
The following is provided in response to your letter of January 20, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS.

Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

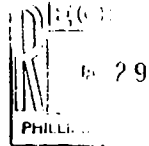
PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

A. Lono Lyman
Planning Director
County of Hawai'i
25 Aupuni St.
Hilo, HI 96720



Jan. 21, 1988

Re: Comment on EIS for Punalu'u

Dear Sir:

We are writing in response to C. Brewer's plans to develop Punalu'u. We don't feel that there should be anymore development allowed because of the damage that has already been done by C. Brewer. The present golf course covers grave yards, especially #1 and #9 holes and the driving range; also the restaurant is known to cover a grave with a canoe and child's body. The existing condominiums also cover burial sites, and C. Brewer ruined the heiau up top on the knob and numerous more graves in constructing the road near the restaurant.

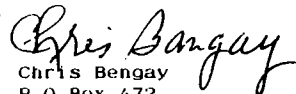
Punalu'u area is historic and still full of graves, ahu's and heiau's, but they will never survive this newly proposed plan.

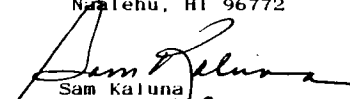
Even now there is pollution in Punalu'u bay because all the seaweed is dying. The turtles live on this seaweed. How can we protect the turtles when we don't protect their area? The brackish ponds of Ninole are suffering too. It used to be so beautiful at Ninole when the spring and Puhau Pond were alive and flushed out to sea.

Before C. Brewer is allowed to build anymore they should be made to clean up the mess they have already made: like cleaning up their chemicals which leach down to the shore, like not destroying any more graves or Hawaiian sites, like showing good faith to the community by digging out Ninole spring and Puhau pond instead of damming it up!

We were both born and raised at Punalu'u and Ninole. As public officials can you help us protect our birth place!? Allowing such a massive development in this small area is just not right.

Mahalo,


Chris Bengay
P.O. Box 472
Naalehu, HI 96772


Sam Kaluna
P.O. Box 672
Paahala, HI 9677

PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

Chris Bengay
P.O. Box 472
Naalehu, Hawaii 96772

Attention: Chris Bengay

SUBJECT: PUNALU'U RESORT DRAFT EIS

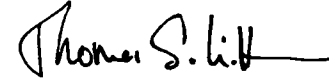
Dear Mr. Bengay:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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Mr. Chris Bengay
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

March 3, 1988

Mr. Chris Bengay
P.O. Box 472
Na'alehu Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Bangay:

The following is provided in response to your letter of January 21, 1988 to Mr. A. Lono Lyman, Planning Director, County of Hawaii.

All Resort development activities that have taken place in the past have been performed in accordance with applicable federal, state and county rules and regulations that were in effect at the time the work was performed. Future activities would similarly be performed in accordance with applicable federal, state and county rules and regulations. This includes survey, identification, preservation and protection of archaeological and historical resources.

As noted in the Draft EIS (see Chapter IV, Section 3 and Appendices A and K) significant archaeological sites will be protected and preserved in keeping with C. Brewer Properties, Inc. commitment to these resources in accordance with the recommendations of its own archaeological consultants and, at a minimum, in accordance with applicable federal, state and county rules and regulations.

Based on the marine surveys, water sampling analyses, current studies and literature searches performed for the subject project, scientific evidence to suggest that Punalu'u Bay is presently polluted or in the future would be polluted by the existing resort or proposed project does not exist. There is evidence that over fishing and improper harvesting practices may be adversely affecting the marine and coastal pond resources.

With regard to the restoration of Ninole Cove, the restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the complex and costly permitting requirements; and the property is under the ownership of the State and, therefore,


conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered their assistance to the State Department of Land and Natural Resources and other agencies that may be interested in the restoration of the cove. The present condition of the cove area is due to severe storms that were experienced in the Ka'u area in the 1981 to 1982 period.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

XII - 154

February 5, 1988

Sam Kaluna
P.O. Box 172
Pahala, Hawaii 96777

Attention: Sam Kaluna

SUBJECT: PUNALU'U RESORT DRAFT EIS


Dear Mr. Kaluna:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principalcc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 3, 1988

Mr. Sam Kaluna
P.O. Box 172
Pahala, Hawaii 96777Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Kaluna:

The following is provided in response to your letter of January 21, 1988 to Mr. A. Lono Lyman, Planning Director, County of Hawaii.

All Resort development activities that have taken place in the past have been performed in accordance with applicable federal, state and county rules and regulations that were in effect at the time the work was performed. Future activities would similarly be performed in accordance with applicable federal, state and county rules and regulations. This includes survey, identification, preservation and protection of archaeological and historical resources.

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Mr. Sam Kaluna
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

conceptual proposals for actions are not feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered their assistance to the State Department of Land and Natural Resources and other agencies that may be interested in the restoration of the cove. The present condition of the cove area is due to severe storms that were experienced in the Ka'u area in the 1981 to 1982 period.

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Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBP HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

P O Box 58
Pahala, HI 96777

January 20, 1988

Mr. Albert Lono Lyman
Planning Director
25. Aupuni St.
Hilo, HI 96720

Dear Mr. Lyman:

As residents of Ka'u for the past eleven years, we are delighted to know that there are proposals for expanding SeaMountain, and we are very hopeful that these proposals will be realized.

In our lives we enjoy everything that SeaMountain now has to offer - beach, golf course and restaurant - and we can only look forward to improved and embellished facilities.

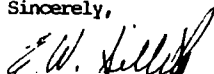
In a district of high unemployment, such as Ka'u, it is gratifying to know that opportunities for jobs will improve, initially in construction of the facilities, and ultimately in the operation of them.

Considering the precarious future of the sugar industry, it is imperative that there be alternative endeavors. The macadamia nut business cannot absorb all of the labor pool of the area. With Ka'u's glorious weather and beauty, resort installations are the natural choice. They enhance the countryside. They change the atmosphere of the area to a certain extent, but they do not pollute it.

We are aware that there is a vocal opposition to any expansion of SeaMountain. We feel those who take this view are not looking realistically at the economics of the district. Without a reasonable level of employment, the stores and services which we now enjoy will not be able to continue operation.

Ka'u cannot remain in a time capsule. No community can. We feel the expansion of the resort is one positive step which can be taken to offset the economic reversal we all face when sugar eventually folds.

Sincerely,


Eric W. Sillito


Pernila Sillito

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Eric and Pernila Sillito
P.O. Box 58
Pahala, Hawaii 96777

Attention: Eric and Pernila Sillito

SUBJECT: PUNALU'U RESORT DRAFT EIS

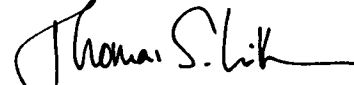
Dear Mr. and Mrs. Sillito:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE (808) 523-5631 TELECOPIER (808) 523-1402

HONOLULU BRVISE DENVER

March 3, 1988

Mr. Eric Sillito and
Ms. Pernila Sillito
P.O. Box 58
Pahala, Hawaii 96777

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. and Ms. Sillito:

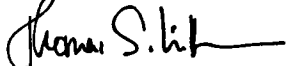
The following is provided in response to your letter of January 20, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS.

Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR, HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

Albert Lono Lyman
Planning Director
County of Hawaii
25 Aupuni Street
Hilo, HI 96720

January 21, 1988,

Dear Mr. Lyman,

I have just completed a reading of the Punalu'u Resort Draft Environmental Impact Statement, dated December 1987.

I would like to urge you to give this project your approval, and hope that you will accept this document. I believe that Brewer has bent over backward to try to satisfy the opponents of the project.

As you are very aware, this land has been zoned for resort development for many, many years. It would be most unfair to the owners and to those of us in the community that have been awaiting this development to impose any further obstacles.

I am writing this letter to you from both a personal and professional standpoint, having been a Big Island resident for over 30 years, a resident of Ka'u for eight years, and very involved with the public as a real estate broker.

For years, it has been acknowledged by the majority of the local residents that the biggest problem facing Ka'u was lack of employment opportunities. C. Brewer is trying to help resolve this problem through economic diversification, and they deserve the cooperation of our County officials.

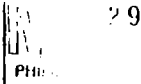
I thank you for your attention to this.

Sincerely,



Beverly Byouk
P. O. Box 6353
Capt. Cook, HI 96704

Telephone: 929-9688



February 5, 1988

Beverly Byouk
P.O. Box 6353
Capt. Cook, Hawaii 96704

Attention: Beverly Byouk

SUBJECT: PUNALU'U RESORT DRAFT EIS

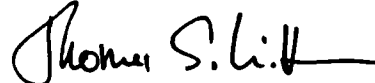
Dear Ms. Byouk:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

PBR

HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

March 3, 1988

Ms. Beverly Byouk
P.O. Box 6353
Captain Cook, Hawaii 96704

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Byouk:

The following is provided in response to your letter of January 21, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS.

Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

Similarly, as noted in Chapter II, Section 2, the present State Land Use designation is Urban and the area is designated Minor Resort on the County General Plan and a majority of the zoning needed to proceed with the proposed project is in place.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

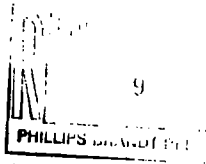
cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402

HONOLULU IRVING DENVER

081 - IIX



January 21, 1988

PBR
HAWAII LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

Mr. Albert Lono Lyman
PLANNING DIRECTOR
25 Aupuni Street
Hilo, HI 96720

Dear Mr. Lyman:

Aloha! We, as residence of Punalu'u, Kau, support the Punalu'u EIS.

I was born and raised in Punalu'u and would like to see progress that is good for the people of Ka'u.

The one's who are not for this project are listening to the wrong people, to our point of view.

We recommend your approval of the Punalu'u Resort EIS.

Me Ke Aloha Pumehana,

Jeanette and Arnold Howard

Mr. & Mrs. A. L. Howard

Mr. & Mrs. A.L. Howard
P. O. Box 4
Pahala, HI 96777

February 5, 1988

Mr. and Mrs. A. L. Howard
P.O. Box 4
Pahala, Hawaii 96777

Attention: Mr. and Mrs. A. L. Howard

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. and Mrs. Howard:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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PBR HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

March 3, 1988

Mr. and Mrs. A. L. Howard
P.O. Box 4
Pahala, Hawaii 96777

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. and Mrs. Howard:

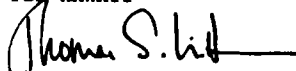
The following is provided in response to your letter of January 21, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS.

Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

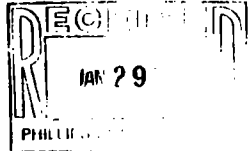
Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



Hawaii Planning Commission
Hilo, Hawaii

1-21-88

Speaking both as a Ka'u property owner and as president of the Homeowners' Association of Sea Mountain Condominiums, I urge you to support the proposed developments at Punalu'u.

In the first place, Ka'u NEEDS this development. It is no secret that sugar is in trouble, and Ka'u could easily find itself with an unemployment problem of immense magnitude.

C. Brewer is the source of the majority of jobs in the area, with our dependence being prominently sugar-related. Even during the picking season, when Macadamia jobs are most plentiful, nuts provide only two jobs for every five in sugar. At other times, the imbalance is even greater.

If the sugar subsidy is dropped (as is periodically threatened by Congress), we shall find ourselves living in a terribly depressed community, and if this should happen, then the proposed development at Sea Mountain (which hopes to provide as many as 1500 jobs), will be our only immediate and viable hope for economic survival.

In the second place, the property in question is PRIVATE PROPERTY, and while the general public may reasonably ask that its interests be protected, there are limits in a free society to the public's "rights" over private holdings. In spite of this, C. Brewer has already responded to the public's concern and has made drastic concessions in its modified proposal.

It is one thing to suggest that the public should be protected from unreasonable exploitation of the area. It is quite another to present irrational obstacles when the cost of defeating the development may well be a severe economic depression for Ka'u.

Many of us agree wholeheartedly with the opposition's wish to keep Ka'us exactly as it is forever. But that is simply not feasible. The fact is that Ka'u must accept controlled change at Sea Mountain, or the present resort will cease to exist, and the entire Ka'u area will face probable economic disaster.

Dr. Richard Hardison
Sea Mountain at Punalu'u

Dr. R. C. Hardison
P.O. Box 70
Pahala, Hawaii 96777

cc: Muffy & Rip

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Dr. Richard Hardison
P.O. Box 70
Pahala, Hawaii 96777

Attention: Dr. Richard Hardison

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Dr. Hardison:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR, HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

March 3, 1988

Dr. Richard C. Hardison
P.O. Box 70
Pahala, Hawaii 96777

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Dr. Hardison:

The following is provided in response to your letter of January 21, 1988 to Hawaii Planning Commission regarding the subject Draft EIS.

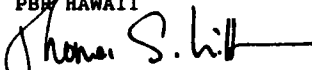
Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

Similarly, as noted in Chapter II, Section 2, the present State Land Use designation is Urban and the area is designated Minor Resort on the County General Plan and a majority of the zoning needed to proceed with the proposed project is in place and the land on which the development would take place is owned in fee by C. Brewer Properties, Inc.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII

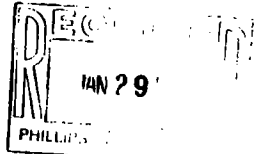

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE (808) 521-5631 TELECOPIER (808) 523-1102

HONOLULU IRVINE DENVER



January 21, 1988

Mr. Albert Lono Lyman
PLANNING DIRECTOR
25 Aupuni Street
Hilo, HI 96720

Dear Mr. Lyman:

I am in favor of the Punalu'u Development EIS. I have been a resident of Ka'u all my life and hope to reside in Ka'u.

How can this come about? There's no job opportunities for the young who are out of high school and who are about to get out of high school. What about the adults who have nothing to do? This is the time to get on your feet and help them with job opportunities in Ka'u.

The people with no jobs and who don't have the means of living off the land and who can't afford to travel far are the adults who have families in Ka'u and are among others who don't want to part from them. These are the people who would appreciate more job opportunities near their home town.

I feel that if the Punalu'u Development goes ahead with the resort, there will be alot of job opportunities for the people of Ka'u and they can reside and live happily in Ka'u.

Sincerely,

Madeline P. Castaneda

Madeline Castaneda
P. O. Box 553
Naalehu, HI 96772

PBR
HAWAII LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Madeline P. Castaneda
P.O. Box 553
Naalehu, Hawaii 96772

Attention: Madeline P. Castaneda

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Castaneda:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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PBR HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

March 3, 1988

Ms. Madeline P. Castaneda
P.O. Box 553
Na'alehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Castaneda:

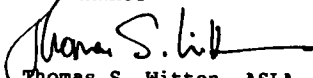
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Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR, HAWAII


Thomas S. Witten, ASLA
Principal

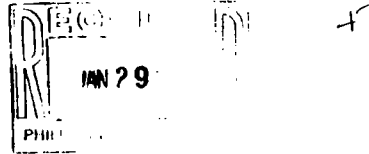
cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE (808) 521-5631 TELECOPIER (808) 523-1402

HONOLULU IRVINE DENVER

January 20 1988



Aloha Mr. Lyman,

My name is Jessie Ke, I am a resident of Ka'u. I am writing in support of the Punalu'u Resort development because I believe that such a development will benefit the future of Ka'u. Our economic activities in Ka'u is very dependent upon agriculture with sugar as the major employer but sugar is unstable with much uncertainty for its survival in wake of sugar decline. The development of ^{the} Resort could provide more jobs per year with an economic advantage to our area. The district of Ka'u is experiencing a growing increase in our community but the employment opportunities are not. Many of our young people who graduate from Ka'u High School, leave the area because lack of employment or worst end up as welfare recipients due to lack of jobs. As a parent I would like to know that my children have the opportunity of a future in Ka'u to remain in Ka'u and become a contributing citizen to their community because our children is Ka'u's future. Once again I do support the Punalu'u Resort development.

Sincerely,

Jessie Ke

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Jessie Ke
P.O. Box 562
Pahala, Hawaii 96777

Attention: Jessie Ke

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Ke:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

XII - 167

AFTER FIVE DAYS RETURN TO

Jessie Ke
P.O. Box 562
Pahala, HI 96777
ZIP CODE

Mr. Albert Louis Lyman

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813
TELEPHONE (808) 521-5631 TELECOPIER (808) 523-1402
HONOLULU IRVINE DENVER

March 3, 1988

Mr. Charles A. W. Lee
SeaMountain Resort, Inc.
Pahala, Hawaii 96777

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Lee:

The following is provided in response to your letter of January 20, 1988 to Mr. Albert Lono Lyman, Planning Director, County of Hawaii regarding the subject Draft EIS.

Thank you for your letter in support of the proposed project. As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR/HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

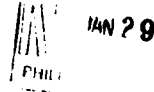
PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

Wednesday, January 20, 1988



ALBERT LONO LYMAN
PLANNING DIRECTOR
25 AUPUNI STREET
HILO, HAWAII 96720

Dear Mr. Lyman:

I am in favor of the EIS and the Punalu'u Development, not because I am employed by C. Brewer & Co., but because I would like to see the Resort Development completed so that there will be job opportunities for the children of Ka'u and for anyone else who would like to live in Ka'u.

Also, we do need a place where people can meet in peace and quiet, and away from the temptations of Shopping malls, etc. to hold meetings and classes for personal development. It would be nice, to have the different groups coming here to meet and perhaps share with the people of Ka'u things that would not only benefit the people, but Ka'u in general.

Sincerely,

Jean S. Shibuya

P.O. Box 64

Maalehu, HI 96772

February 5, 1988

Jean S. Shibuya
P.O. Box 64
Maalehu, Hawaii 96772

Attention: Jean S. Shibuya

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Shibuya:

This is to acknowledge receipt of your letter of January 20, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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March 3, 1988

Ms. Jean S. Shibuya
P.O. Box 64
Na'alehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Shibuya:

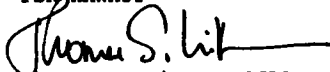
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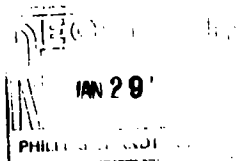
Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President
C. Brewer Properties, Inc.



1/21/88

PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

To Whom It May Concern:

I am writing this letter in regards to the proposed development at Punalu'u Beach in Ka'u, Hawai'i. I was born and raised in Ka'u and at the present I am attending University of Hawai'i at Hilo, working towards my degree in Hawaiian Studies. I am also one of the many nineteen year olds in Hawaiian Studies greatly concerned about the preservation of our native lands and beaches. Another concern is that of perpetuating the Hawaiian language as well as the carrying on of the culture, traditions, and the immortality of everything that is Hawaiian.

This is not as easy as it sounds. It may have been so fifty, one-hundred and even two-hundred years ago, but today we fight for the land in order to preserve our right as the Maka'ainana. The land is all that we, the people of Hawai'i have left. It is the Hawaiian culture. I and many others agree this may not be the best way, but when you have groups like C. Brewer coming in with the intent of building a hotel, spaceport and etc., on our Precious Hawaiian lands, we are left with no choice but to fight this so called "Progress". These acts do not help they destroy.

I, believe the Hawaiian people are hardly ever given the chance to express their views or concerns. We are not even given the right to have a fair chance or truly be listened to. We love our land and everything that surrounds it! We especially feel malama for the people who care for it. These mo'opunas are of the utmost importance to us. We are forced, through the tyranny of so called progress, to see our precious lands being covered by cement edifices. No amount of money can pay for what these lands are worth because they are truly priceless. Development such as this rapes the land causing it to become a mere shadow of it's beauty as God meant. These lands and the surrounding ocean will soon become irreplaceable. If this is the case, which it is, then the lands should be given to its rightful owner, the Hawaiians. They should be able to decide what to do, for we call this place Hawai'i, therefore it should be ruled by the Hawaiians!

After having read this letter and many others I am sure you have recieved, I hope you will take into consideration that we Hawaiians will not allow our lands to be destroyed for the purpose of hotels and spaceports. I, would suggest you forget the Punalu'u Development and sign-up, become a part of its preservation which is by far a worthwhile cause.

Sincerely,
Kehaa Lee Hong
Kehaa Lee Hong

*Ch. A. Kankani - meet
Hilo, Hawaii 1/21/88*

February 5, 1988

Kehaa Lee Hong
74 Kaulani Street
Hilo, Hawaii 96720

Attention: Kehaa Lee Hong

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Hong:

This is to acknowledge receipt of your letter of January 21, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

for Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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March 3, 1988

Ms. Kehaa Lee Hong
74 Kaulani Street
Hilo, Hawaii 96720

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Hong:

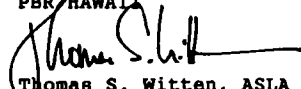
The following is provided in response to your letter of January 21, 1988 regarding the subject Draft EIS.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

FINANCIAL PLAZA OF THE PACIFIC 130 MERCHANT STREET, SUITE 1111 HONOLULU, HAWAII 96813

TELEPHONE: (808) 521-5631 TELECOPIER: (808) 523-1402

HONOLULU IRVINE DENVER

January 22, 1988

90 SUMIKO HANOA
P.O. Box 268
NAALEHU, HAWAII
96772

MM 29

Albert Lyman
County Planning Dept.
25 Auahi St.
Hilo Hawaii 96720

Re: Environmental Impact Statement "Punaluu Resort"

I strongly feel that the County should not grant C. Brewer the S.M.A. permit for the rezoning of Punaluu. I feel that Punaluu should be kept as a recreational area for the people of Ka'u. How is C. Brewer going to compete with the multi million dollar development proposed for Kahuna? Do we need resorts in this area when Riviera resorts will be able to fill all job needs within the area and more. Riviera will also be large enough to employ the communities within the Ka'u district. This resort proposed for Ka'u at Punaluu will also be taking away our only beach in the area. I have worked in the restaurant business for 12 years. It has been a very unstable industry. It is hard work and sometimes unrewarding but I need to work to support myself and my family. I hope to see my children have better opportunities and to further their education. I hope to see the children of Ka'u with white collar jobs instead of food service positions, or maintenance positions. It is very important in this day and age for us to be concerned with the quality of our environment. What decision we make today will alter our children's lives forever. How fast we say development but how slow we forget about our unique environment. For us the people of Ka'u Punaluu is all we have in a form of getting back to our culture. So lets keep what little we have left of Hawaii and of our uniqueness so that future generations may be able to enjoy what we have. So I urge you county planners to deny granting of the S. M. A. permit and give this development a definite NO!!!
NO DEVELOPMENT AT PUNALUU!!!!!!!

MAHAIO,

Pauline S. Hanoa
Kaalaiki Ka'u

PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 5, 1988

Pauline S. Hanoa
c/o Sumiko Hanoa
P.O. Box 268
Naalehu, Hawaii 96772

Attention: Pauline S. Hanoa

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Ms. Hanoa:

This is to acknowledge receipt of your letter of January 22, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

for Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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March 3, 1988

Ms. Pauline S. Hanoa
c/o Sumiko Hanoa
P.O. Box 268
Na'alehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Ms. Hanoa:

The following is provided in response to your letter of January 22, 1988 to Mr. Albert Lyman, County Planning Department regarding the subject Draft EIS.

As noted in the Draft EIS (see Chapter IV, Section 7), the proposed project includes plans to improve and enhance the recreational facilities and amenities at Punalu'u. Pedestrian access to existing coastal recreation resources will be maintained as will pedestrian access to coastal swimming, fishing and food gathering locations. Vehicular access to the boat launch ramp, beach park and area east of Ninole Cove also will be provided.

The economic viability of the proposed project is fully described in Chapter II, Section 3.4 of the Draft EIS. At this time, the proposed Hawaiian Riviera project is only a proposal, whereas a significant portion of the Punalu'u Resort has been constructed.

The analyses conducted for the proposed Punalu'u Resort project indicate that the Resort would be absorbed into the Big Island market during the development period; would provide a positive revenue source to the state and county; and would provide a range of economic and job opportunities to the residents of Ka'u.

As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community.

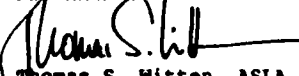
Ms. Pauline S. Hanoa
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes, and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBR HAWAII



Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

January 19, 1988

*To Postmaster
Naalehu, Hawaii
96772*

Albert Lyman
County Planning Dept.
2, Aupuni St.
Hilo, Hawaii 96721

Jan 29
1988

Re: Environmental Impact Statement

I am writing to you to share my concerns about the proposed development for Punaluu. I am a Native Hawaiian born and raised in Ka'u, and a resident of this district. This development will be altering my lifestyle in which I am accustomed to. My gathering rights and my free access to the coastline will be denied if this development is approved. This development will be taking away our only safe and easily accessible beach with in our district. I am totally opposed to such a development that offers the people of Ka'u only minimal maintenance and food service jobs that will not be guaranteed to the residents of Ka'u. The people of Ka'u live a very unique lifestyle they gather their foods from the ocean as well as from the mountains. Punaluu is a valuable food resource when their wages do not meet the rising cost of inflation. There is a great need now to perpetuate our culture for future generations. That is why Punaluu is so very important and why we have to save this important resource. As a native Hawaiian I refuse to give up my Aina which has fed and took care of me. "Ua mau ke ia i ka aine i ka pono" the life of the land is perpetuated in rightousness" I urge you county planners to deny the granting of the S.M.A permit to C. Brewer and to prevent further rip offs of our Aina!!!!!!

ALONA AINA

Bernard Keliikoa

BERNARD KELIIKOA

KA'U

PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

Bernard Keliikoa
c/o Postmaster
Naalehu, Hawaii 96772

Attention: Bernard Keliikoa

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Keliikoa:

This is to acknowledge receipt of your letter of January 19, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten
for Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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March 3, 1988

Mr. Bernard Keliikoa
c/o Postmaster
Na'aiehu, Hawaii 96772

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Keliikoa:

The following is provided in response to your letter of January 19, 1988 to Mr. Albert Lyman, County Planning Department regarding the subject Draft EIS.

As described in the Draft EIS (see Chapter IV, Section 5.1.3, pedestrian access to coastal swimming, fishing and food gathering locations and resources will be maintained by the plans for the proposed project. Similarly, as described in Chapter IV, Section 7, the recreational resources of the area would be improved and enhanced by the proposed project. Access to the black sand beach, boat ramp and other coastal areas would be maintained for the use of the residents of the area and visitors to the Resort.

The archaeological, historical and cultural resources of the Punalu'u area would also be preserved and protected by the plans for the proposed project as is described in Chapter IV, Section 3 and Appendices A and K of the Draft EIS.

As noted in the Draft EIS (see Chapter II, Section 3.2) specific project objectives are to continue to provide a substantial amount of employment opportunities within the community and to improve the overall economic and social well being of the community. The analyses performed for the proposed project indicate that these objectives would be met by the proposed project.

As you may be aware, the purpose of an environmental impact statement is to publicly disclose the potential environmental impacts of a given project. Accordingly, acceptance of an environmental impact statement does not mean that a particular project is "good" or "bad", but rather that the environmental impact statement satisfies the legal disclosure and procedural requirements set forth by Chapter 343, Hawaii Revised Statutes,


Mr. Bernard Keliikoa
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

and the EIS Rules and Regulations. Consequently, comments that do not pertain to the legal adequacy of an environmental impact statement are not specifically addressed in this letter, but instead are more appropriately aired at public hearings for the land use and zoning permits applicable to a particular project.

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

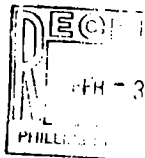
Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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U.S. Department of Housing and Urban Development
 Honolulu Office, Region IX
 300 Ala Moana Blvd., Room 3318, Box 50007
 Honolulu, Hawaii 96850-4991

88-29

January 28, 1988

Mr. Thomas S. Witten
 PBR-Hawaii
 130 Merchant Street, Suite 1111
 Honolulu, Hawaii 96813

Dear Mr. Witten:

SUBJECT: Punalu'u Resort
 Draft Environmental Impact Statement

We have reviewed the Draft EIS for the subject project that proposes the development of 2,051-2,981 planned units in hotel rooms, hotel/condominium units, multifamily residential units and single family units; 1,983-3,288 projected market support units having a similar breakdown as above; and a golf course and a village commercial/services center on 433 acres in Punaluu.

The following comments apply only to housing projects where HUD programs would be utilized:

1. Housing units located within the 100-year floodplains must comply with Executive Order 11988, Floodplain Management.
2. Any housing site that may impact on archeological resources must comply with the National Historic Preservation Act of 1966, as amended.
3. Housing units located southeast of the Hawaii Belt Road are located in a volcanic risk zone that HUD had determined to be an unacceptable risk for HUD assisted housing programs.

It should be pointed out, however, that we are in the process of evaluating the boundaries that define volcanic risk zones. We expect to complete this evaluation within six to eight weeks. We shall advise you of the results of this evaluation upon its completion.

If you have any questions on this matter, please call Frank Johnson at 541-1326.

Very sincerely yours,

Calvin Lew
 Calvin Lew
 Director
 Community Planning and
 Development Division

PBR
HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

February 5, 1988

U.S. Department of Housing and Urban Development
 Honolulu Office, Region IX
 300 Ala Moana Blvd., Room 3318, Box 50007
 Honolulu, Hawaii 96850-4991

Attention: Calvin Lew,
 Director, Community Planning and
 Development Division

SUBJECT: PUNALU'U RESORT DRAFT EIS

Dear Mr. Lew:

This is to acknowledge receipt of your letter of January 28, 1988 regarding review of the subject Draft EIS. A detailed response to the issues and questions you have raised is being prepared and will be forwarded to you within the next few weeks. A copy of this letter, your letter and the detailed response letter will be appended to the Final EIS.

Thank you for participating in the Draft EIS review process.

Sincerely,

PBR HAWAII

Thomas S. Witten

Thomas S. Witten, ASLA
 Principal

cc: Mr. A. L. Lyman, Planning Director,
 County of Hawaii
 Mr. B. G. Moynahan, Senior Vice President,
 C. Brewer Properties, Inc.

XII - 179

March 3, 1988

U.S. Department of Housing
and Urban Development
Honolulu Office, Region IX
300 Ala Moana Blvd., Room 3318
Box 50007
Honolulu, Hawaii 96850-4991

Attention: Mr. Calvin Lew,
Director, Community Planning and
Development Division

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Mr. Lew:

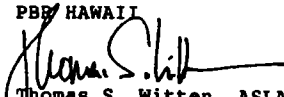
Thank you for your letter of January 28, 1988 regarding the
subject Draft EIS. The following is provided in response to your
letter.

1. Housing units that would be located within the 100-year floodplain will comply with Executive Order 11988, Floodplain Management. To ensure that our files are up to date, this is to request a copy of the latest version of the Order.
2. A Full Archaeological Reconnaissance Survey of the proposed project site has been completed (see Appendix A of Draft EIS) and a Draft Outline for a Historic Sites Management Plan prepared (see Appendix K). The significant archaeological sites found within the project property will be preserved in accordance with applicable federal, state and county rules and regulations.
3. Thank you for the information regarding the present unacceptability of HUD assisted housing southeast of the Hawaii Belt Highway. We appreciate your offer to forward any revisions to us based on the results of your present evaluation process.

Mr. Calvin Lew
PUNALU'U RESORT DRAFT EIS
March 3, 1988
Page 2

Thank you for your comments and participation in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

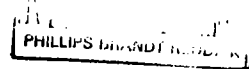
Sincerely,

PBR HAWAII

Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Director,
County of Hawaii Planning Department
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

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Hi. County
1005



STP 8.2661

February 17, 1988

Mr. Albert Lono Lyman, Director
Planning Department
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

Draft Environmental Impact Statement
Punalu'u Resort, Kau, Hawaii

We offer the following comments on the proposed Punalu'u
Resort development:

1. As a condition for permit approval, the developer should channelize the intersection of Punalu'u Road and Mamalahoa Highway.
2. Any work within the State highway right-of-way must be reviewed and approved by our Highways Division with all costs borne by the developer.
3. The developer should dedicate lands along the Hawaii Belt Road for future transportation needs. We are recommending a 150' highway corridor be established in this area.
4. In order to have transportation infrastructure improvements in a timely manner, we will be assessing developer impact fees or other means to have developers fund highway improvements, such as road widening, necessitated by the impacts of their development.

Thank you for this opportunity to provide comments.

Very truly yours,

Edward Y. Hirata
Director of Transportation

DT:ko

cc: HWY-D, STP(dt)
Mr. Thomas Witten, PBR-Hawaii

March 18, 1988

State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

Attention: Mr. Edward Y. Hirata,
Director of Transportation

Subject: PUNALU'U RESORT DRAFT EIS,
KA'U, HAWAII

Dear Mr. Hirata:

Thank you for the copy of your letter of February 17, 1988 to Mr. Albert Lono Lyman, Director, Planning Department regarding the subject Draft EIS. The following is provided in response to your letter.

1. Based on the traffic analyses conducted for the subject project, present conditions indicate that the intersection of Mamalahoa Highway and the county Punalu'u Road should be provided with a left turn lane for vehicles travelling from the Volcano direction. As indicated in our previous correspondence, C. Brewer Properties will continue to work with your department and the County Department of Public Works to assure the safe and efficient flow of traffic. The traffic analyses performed for the proposed project will project the timing and need for state and county highway improvements.
2. As noted above, C. Brewer Properties, Inc. will continue to work with your department regarding future actions that may be required for the state highway. It is understood that improvements that are directly caused by the proposed project would be the financial responsibility of the developer.
3. As noted in the Draft EIS, the proposed project is in the planning stage at this time. As planning proceeds and future highway requirements are known, highway right-of-way requirements will be better defined.


Mr. Edward Y. Hirata
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 2

4. As indicated in the Draft EIS (see Chapter IV, Section 4.2.2.5), projected state and county revenues resulting from the proposed project are estimated to be between 2.7 and 2.8 and 2.6 and 2.7 times expenditures respectively at project completion. It would appear that these positive ratios would be sufficient to pay for any future state or county expenditures that may be required. The analyses performed to determine the revenue/expenditure ratios has taken into account future highway improvement costs.

Thank you for your comments and participating in the Draft EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

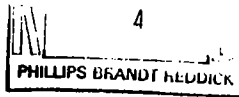
PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.



Ka ohana O Kalae
Concern Hawaiians & Friends



PBR
HAWAII

LANDSCAPE ARCHITECTURE PLANNING ENVIRONMENTAL STUDIES

February 18, 1988

Mr. Albert Lono Lyman, Director
County of Hawaii, Planning Department
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Lyman:

ERRATA
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PUNALU'U RESORT
KA'U, HAWAII

We apologize for a significant typographical omission in our 1/22/88 review of the Punalu'u Resort DEIS. On page 11, in the section titled, "Alternatives," we stated:

"Another viable alternative which was not considered would be to develop the entire area as a Marine Conservation District due to its unique marine resources, habitat, and biota."

We inadvertently omitted the location for the Marine Conservation District. We believe a Marine Conservation District should be developed only in the Ninole Pond area that was originally proposed for restoration. Identifying the entire area as a Marine Conservation District would mean that our fishermen would not be allowed to continue their subsistence practices.

The paragraph should read as follows:

"Another viable alternative which was not considered would be to develop the entire Ninole Pond restoration area as a Marine Conservation District due to its unique marine resources, habitat, and biota."

Again, we thank you for your patience and understanding. We apologize for any inconvenience that may have occurred as a result of this omission.

Melissa Pond,

is Chairperson

March 18, 1988

Ka ohana O Kalae
c/o Native Hawaiian Legal Corporation
1270 Queen Emma Street, Suite 1004
Honolulu, Hawaii 96813

Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Sir or Madam:

The following is provided in response to your letter of February 18, 1988 to Mr. Albert Lono Lyman, Director, County of Hawaii Planning Department regarding the subject Draft EIS.

As indicated in our letter of March 3, 1988 to you regarding the subject Draft EIS and proposed Punalu'u Resort project, comments and suggestions regarding the establishment of Marine Conservation Districts are more properly addressed to the State Department of Land and Natural Resources, Aquatic Resources Division.

The alternatives discussed in the Draft EIS (see Chapter III), have been described and evaluated in accordance with appropriate EIS rules. Among other criteria, alternatives are evaluated in terms of their ability to meet the project objectives. The alternative of establishing a Marine Conservation District does not meet the project objectives and, therefore, is not considered feasible.

Although the project that was proposed in 1986 and 1987 included a conceptual proposal for the restoration of Ninole Cove and the re-connection of Pond No. 2 to Ninole Cove and the ocean, those elements of the project have been deleted from the project.

The restoration work was deleted from the proposed project because, with the revised Master Plan, the work is no longer essential to the project; the permitting requirements are complex and costly; and the property is under the ownership of the State and, therefore, conceptual proposals for actions are not

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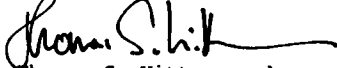
Ka ohana O Kalae
PUNALU'U RESORT DRAFT EIS
March 18, 1988
Page 2

feasible. C. Brewer Properties, Inc. continues to believe that the restoration of the cove would be desirable, but that the restoration should be evaluated on its own merits and not as a part of the proposed Punalu'u Resort completion work. C. Brewer Properties, Inc. has offered to work with the State Department of Land and Natural Resources, or any other interested agency, in the planning and restoration of the cove.

Thank you for your comments and participation in the EIS review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

PBB, HAWAII


Thomas S. Witten, asla
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.

PBR HAWAII

LANDSCAPE ARCHITECTURE

PLANNING

ENVIRONMENTAL STUDIES

March 24, 1988

Ka ohana O Kalae
c/o Native Hawaiian Legal Corporation
1270 Queen Emma Street, Suite 1004
Honolulu, Hawaii 96813

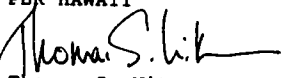
Subject: PUNALU'U RESORT DRAFT EIS
KA'U, HAWAII

Dear Sir or Madam:

The following is provided to clarify the second paragraph on page 11 of our response of March 4, 1988 to you regarding the subject Draft EIS and your comments thereon dated January 22, 1988. We note that C. Brewer Properties, Inc. has been working with the attorneys of the Bangay Estate to clarify the existence, nature and scope of a claim by the Bangay Estate regarding the real property proposed for development as part of the Punalu'u Resort project.

Sincerely,

PBR HAWAII


Thomas S. Witten, ASLA
Principal

cc: Mr. A. L. Lyman, Planning Director,
County of Hawaii
Mr. B. G. Moynahan, Senior Vice President,
C. Brewer Properties, Inc.
Mr. Ben Kudo, KWSK