



111 S. King Street
Suite 170

Honolulu, HI 96813

808.523.5866

www.g70.design

November 17, 2025

Ms. Mary Alice Evans, Director

State of Hawai'i

Office of Planning and Sustainable Development

Environmental Review Program

235 South Beretania Street, Room 702

Honolulu, Hawai'i 96813

Daniel E. Orodenker

Executive Officer

Land Use Commission

State Office Tower

Leiopapa A Kamehameha

235 S. Beretania Street, Room 406

Honolulu, Hawai'i 96813

**Subject: University of the Nations, Kona, Inc. 2020 Master Plan Update
Second Final Environmental Impact Statement
Tax Map Key (TMK): (3) 7-5-010:085 and (3) 7-5-017:006
Kailua-Kona, Island of Hawai'i, Hawai'i**

Dear Director Evans and Executive Officer Orodenker:

On behalf of the Applicant, the University of the Nations, Kona, Inc., G70 is submitting the Second Final Environmental Impact Statement (EIS) for the University of the Nations, Kona, Inc. Master Plan Update (the project) located in Kailua-Kona to the State Office of Planning and Sustainable Development, Environmental Review Program for publication in the November 23, 2025, edition of *The Environmental Notice (TEN)*. In accordance with Hawai'i Administrative Rules (HAR) §11-200.1-5(e)(6)(C), the Second Final EIS has been simultaneously filed with the Land Use Commission, the accepting authority, for acceptance pursuant to HAR §11-200.1-28.

A Final EIS for the project was published in the June 23, 2025, edition of *TEN*, but was withdrawn on July 23, 2025, due to an inadvertent omission of a comment letter received during the public scoping comment period. The omitted comment letter is reproduced in Vol I, Section 8.2, and Volume II, Appendix N of the Second Final EIS. Additionally, the Commission of Water Resource Management approved the preparation of a First-Generation Keauhou Aquifer System Area Groundwater Adaptive Management Plan in July 2025. Relevant information for the Groundwater Adaptive Management Plan has been integrated throughout the Second Final EIS. Minor revisions were made to address flora and fauna resources in Vol I, Section 4.16 and 4.17. No substantive changes to the project and Final EIS analysis were made.

The following table summarizes the changes that were made in the Second Final EIS.

Changes to the June 23, 2025 Final EIS, as provided in the Second Final EIS	
Volume I: EIS Document	Cover (Page 1 and 3): Date of the Second Final EIS as “November 2025” and title of document as a “Second” Final Environmental Impact Statement.
	Headers: Title of the document as a “Second” Final Environmental Impact Statement.
	Executive Summary (Page ES-16): Discussion of the forthcoming Keauhou Adaptive Management Plan.
	Section 4.5 (Page 4-17): Footnote 1 added a disclosure that the Keauhou Water Use and Development Plan has not been formally adopted and remains a draft document.
	Section 4.5 (Page 4-20): Discussion of the forthcoming Keauhou Adaptive Management Plan.
	Section 4.6.7 (Page 4-34): Discussion of the forthcoming Keauhou Adaptive Management Plan.
	Section 4.16 (Page 4-110): Additional information on natural resources related to traditional and customary practices in the Kona area.
	Section 4.17 (Page 4-113): Additional information on natural resources related to traditional and customary practices in the Kona area.
	Section 5.1 (Page 5-2): Discussion of the forthcoming Keauhou Adaptive Management Plan.
	Section 5.6 (Page 5-8): Discussion of the forthcoming Keauhou Adaptive Management Plan.
	Section 8.2 (Table 8-2; Page 8-14): Inclusion of the U.S. Department of Interior, National Parks Service EIS Preparation Notice comment letter that was inadvertently omitted from the first Final EIS.
	Section 8.3 (Table 8-3; Page 8-33 & 8-37): Discussion of the forthcoming Keauhou Adaptive Management Plan.
Volume II: Appendices	Cover (Page 1 and 3): Date of the Second Final EIS as “November 2025” and title of document as a “Second” Final Environmental Impact Statement.
	Appendix N: Inclusion of the U.S. Department of Interior, National Parks Service comment letter on the EIS Preparation Notice that was inadvertently omitted from the first Final EIS.

This Second Final EIS consists of two volumes and has been prepared in compliance with Hawai‘i Revised Statutes Chapter 343 and the Hawai‘i Environmental Impact Statement rules (HAR §11-200.1).

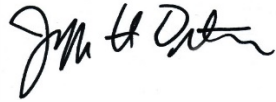
In accordance with HAR §11-200.1-5(e)(6)(C), this Second Final EIS is also being simultaneously submitted to the State of Hawai‘i Land Use Commission (LUC), the accepting authority, for acceptance pursuant to HAR §11-200.1-28. Pursuant to HRS §343-5(e) and HAR § 11-200.1-28(e)(2), the LUC has thirty days from the date of submission to issue a determination on the acceptability of the Second Final EIS.

Ms. Mary Alice Evans, Director
Mr. Daniel E. Orodener, Executive Officer
November 17, 2025
Page 3 of 3

Should you have any additional questions, please contact me at (808) 523-5866.

Sincerely,

GROUP 70 INTERNATIONAL, INC., dba G70

A handwritten signature in black ink, appearing to read "J. H. Overton", written in a cursive style.

Jeffrey H. Overton, AICP, LEED AP
Principal

cc: David Hamilton, Timothy Bish, Elijah Yip, University of the Nations, Kona, Inc.