

A04-753
Aina Nui Corp.

Comment Letters

PUBLIC WITNESS SIGN IN SHEET

Please indicate your address if
you would like to receive future
notices regarding this docket.

DATE: Oct 19, 2005
DOCKET NO.: A04-793/Alinui Alu-
Corp

Please PRINT name	Organization	Address	Zip Code
1. Ken Williams	Koolina Community Assoc.	92-1480 Alinui Drive, Kapolei	96734
2. RALPH F. HARRIS	Koolina Fairways MOA	92-1527-H Alinui Dr.	96707
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			

**IMANAKA
KUDO &
FUJIMOTO**

A Limited Liability Law Company

Mitchell A. Imanaka

Benjamin A. Kudo

Wesley M. Fujimoto

Jon M.H. Pang

Richard T. Asato, Jr.

Naomi U. Kuwaye

Bryan P. Andaya

Nikki T. Senter

Ryan E. Sanada

Nina L. Yang

Cameron W. Nekota

April J. Cadiz

Stephanie G. Uechi

Owen T. Iida

Of Counsel

R. Brian Tsujimura

Perfecto R. Yasay, Jr. *

* admitted to practice only in
New York and Philippines

Hon. Mario R. Ramil

Former Associate Justice
Hawaii Supreme Court

Amfac Center, Hawaii Tower
745 Fort Street Mall, 17th Floor
Honolulu, Hawaii 96813
Phone (808) 521-9500
Facsimile (808) 541-9050
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http://www.imanakakudo.com

May 23, 2006

Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
Attn: Anthony J. H. Ching
Executive Officer
State Office Tower
235 South Beretania Street, 4th Floor
Honolulu, Hawaii 96813

**Re: Land Use Commission Docket A04-753, Aina Nui Corporation,
Kapolei West Expansion Area Project**

Please find enclosed the following:

<u>Copies</u>	<u>Dated/Filed</u>	<u>Description</u>
1	4/14/06 D	Notice of Imposition of Conditions By The Land Use
	4/17/06 F	Commission

Is/Are transmitted herewith...

- | | |
|---|---|
| ☒ For your information and file | ☐ For necessary action |
| ☐ For execution and return | ☐ Per your request |
| ☐ For execution and forwarding as noted below | ☐ For our conversation |
| ☐ For execution in <u>black</u> ink before a Notary Public | ☐ For payment |
| ☐ For review and comment | ☐ See remarks below |
| ☐ Approved as noted | |

REMARKS: Enclosed is a recorded copy of the Notice of Imposition of Conditions by the Land Use Commission for your information and files.

Very truly yours,
IMANAKA KUDO & FUJIMOTO

By Cameron W. Nekota esq.
Cameron W. Nekota

Enclosure

Method of Delivery: ☐ Mail ☒ Hand Delivery ☐ Facsimile ☐ Other:

LAND USE COMMISSION
STATE OF HAWAII

2006 MAY 23 A 11: 56

BS has separate copy.

Sandy-file approach



R-678

STATE OF HAWAII
BUREAU OF CONVEYANCES
RECORDED

APR 17, 2006 09:00 AM

Doc No(s) 2006-070825

/s/ CARL T. WATANABE
REGISTRAR OF CONVEYANCES

20 1/1 Z9

LAND COURT SYSTEM

REGULAR SYSTEM

AFTER RECORDATION: RETURN BY MAIL () PICK UP (X)

Benjamin A. Kudo, Esq.
Naomi U. Kuwaye, Esq.
745 Fort Street, 17th Floor
Honolulu, Hawaii 96813

Phone: (808) 521-9500

Tax Map Key Nos. (1) 9-1-14: Por. 33 and (1) 9-1-15: Por. 4 and Por. 20

Total Pages: 3

NOTICE OF IMPOSITION OF CONDITIONS BY THE LAND USE COMMISSION**KNOW ALL PERSONS BY THESE PRESENTS:**

Please take notice that AINA NUI CORPORATION, a Hawaii corporation, whose principal place of business is 1001 Kamokila Boulevard, Suite 255, Kapolei, Hawaii 96707 (hereinafter "Petitioner") was the Petitioner in State Land Use Commission (hereinafter "Commission") Docket No. A04-753, for the reclassification of approximately 174.209 acres of land, situated at Ewa, Island of Oahu, State of Hawaii, more particularly identified as Tax Map Key Nos. (1) 9-1-14: por. 33 and (1) 9-1-15: por. 4 and por. 20 (hereinafter "Property"), and does hereby state and declare that the Commission, by its certain Findings of Fact, Conclusions of Law, and Decision and Order, adopted and approved on April 6, 2006 and filed and effective on April 10, 2006, reclassified the Property under Docket No. A04-753 from the State Land Use Agricultural District to the State Land Use Urban District and amended the State Land Use district boundary accordingly, subject to a number of conditions (the "Conditions") imposed by the Commission on the reclassified Property. The aforementioned Conditions shall run with the land and shall be set forth in a Declaration of Conditions (hereinafter "Declaration of Conditions") to be subsequently recorded at the Bureau of Conveyances of the State of Hawaii (hereinafter "Bureau of Conveyances") pursuant to Section 15-15-92, Hawaii Administrative Rules.

This Notice of Imposition of Conditions by the Commission shall be superseded upon the recordation of the said Declaration of Conditions at the Bureau of Conveyances setting forth the conditions imposed by the Commission in Docket No. A04-753.

DATED: Honolulu, Hawaii, April 14, 2006.

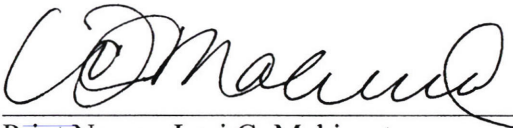
AINA NUI CORPORATION,
a Hawaii corporation

By  _____
DONNA GOTH
Its President

STATE OF HAWAII)
) SS.
CITY AND COUNTY OF HONOLULU)

On this 14th day of April, 2006, before me personally appeared DONNA GOTH, to me personally known, who, being by me duly sworn, did say that she is the President of the AINA NUI CORPORATION, a Hawaii corporation, and that the said instrument was signed on behalf of said corporation by authority of its Board of Directors, and that said officer acknowledged said instrument to be the free act and deed of said corporation.

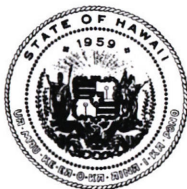




Print Name: Lori C. Makimoto
Notary Public, State of Hawaii

My commission expires: 03-30-2007

LINDA LINGLE
GOVERNOR OF HAWAII



LAND USE COMMISSION
STATE OF HAWAII

GENEVIEVE K. Y. SALMONSON
DIRECTOR OF OEQC

STATE OF HAWAII 2005 JUL -5 A 8:16
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
DEPARTMENT OF HEALTH
LEIOPAPA A KAMEHAMEHA
235 SOUTH BERETANIA STREET, SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185

In reply, please refer to:
File:

June 30, 2005

Ms. Donna Goth
'Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96793

Mr. Anthony Ching.
State of Hawaii - Department of Business Economic Development and Tourism
Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

Ms. Carolyn Olson Orr
Helber Hastert and Fee Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mesdames Goth and Orr, and Mr. Ching:

The Office of Environmental Quality Control has reviewed the distribution list for the final environmental impact statement for the Kapolei West Project, Tax Map Key 9-1-14 por. 33; 9-1-15 por. 4 and por. 20, situated in the judicial district of 'Ewa and pursuant to Section 11-200-21, Hawaii Administrative Rules, authorizes distribution of the document

If there are any questions, please call me at (808) 586-4185.

Sincerely,

LESLIE SEGUNDO
Environmental Health Specialist

LINDA LINGLE
GOVERNOR



LAND USE COMMISSION
STATE OF HAWAII

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MAY 25 A 8 02

Sandy-file EIS comment
Xc Bert
Bert's
Concerns and
incorporate
into your
report

RODNEY K. HARAGA
DIRECTOR
Deputy Directors
BRUCE Y. MATSUI
BARRY FUKUNAGA
BRENNON T. MORIOKA
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

DIR 1.10108

May 6, 2005

Ms. Donna Goth
President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, HI 96707

Dear Ms. Goth:

Subject: Aina Nui Corporation, Kapolei West Expansion Area
Draft Environmental Impact Statement, March 2005
(Includes Traffic Impact Assessment Report dated November 2004)

In response to the request for our review of the subject Draft EIS, which includes a traffic impact assessment report (TIAR), this is to advise you that the prior comments in our letters STP 8.1162 dated May 20, 2004 and STP 8.1498 dated December 14, 2004 (copies attached) are still applicable. The following supplements and updates our earlier comments:

1. The Draft EIS indicates that a drainage channel from the project is planned to drain into Kalaeloa Barbers Point Harbor. We were unaware that a channel connecting to the harbor has been planned. In the past, our Harbors Division communicated its concern to the surrounding land owners and developers that runoff into the harbor was creating problems. You need to explore alternatives to the proposed channel. Please keep our Department apprised of your drainage plans; you may submit preliminary plans for our early input.
2. We remain concerned that the plans for the proposed project, at its southern most end, reflect developing residences next to Kalaeloa Barbers Point Harbor. Residential units that close to the harbor will be impacted by noise, odors, fumes, dust and industrial-security lights from the harbor. Related commercial or industrial uses are more compatible to the site because of its proximity to the harbor. If, however, the plans

remain as a residential development, (a) mitigation measures, including special materials in the design and construction of improvements will be needed, (b) the developer/seller should provide proper disclosure to prospective occupants and users of this area and (c) a covenant, running with the land, indemnifying the State of harbor impacts on the project, should be incorporated into the ownership, use or lease agreement and evidence of the indemnification should be provided to our Department.

3. While the TIAR and Draft EIS describe impacts and identify recommended highway improvements, there is need to update and revise the documents. Ongoing work and meetings, between the State/County agencies and your staff/consultants have been conducted, to cover the integration and coordination of our Department's highway facilities with the internal roadways and connecting road linkages to adjacent land developments. For example, our department and the local FHWA office staffs recently met with your representatives on road project funding and a design/planning adjustment to a ramp connection and resulting traffic changes. The roadway changes should be documented in an update.

With regard to the TIAR itself, we have the following additional technical comments that also need to be addressed when revising the traffic report:

a. Various roadway improvements are being assumed to be in place by the project opening, e.g. Kalaeloa Boulevard widened to six lanes; completion of Kapolei interchange. This is overly optimistic, and alternative interim improvements should be identified which will accommodate the traffic.

b. Table 2-1 shows the analysis of intersections. It would be helpful to have the table or portions of it duplicated in later sections of the report when discussions of an intersection occur so that referencing and correlating information can be easier.

c. Existing Traffic Conditions Chapter – (1) The report states that at the Makakilo Drive/Farrington Highway intersection congestion is a result of long cycle lengths and the number of signal phases. The evaluation should include a discussion of other factors; (2) A speed study or other evidence is needed to support the statement that "...field observations indicate that a substantial portion of drivers exceed this speed."

d. Supporting analysis or separate evaluation of the ramps was not included in the traffic report. Such ramp analysis should be included with the necessary mitigation.

e. Use of the Specialty Retail Center category for trip generation is not recommended. Shopping Center trip rates should be used.

Ms. Donna Goth
Page 3
May 6, 2005

DIR 1.10108

f. Drawings, diagrams or illustrations of roadway and intersection improvements being recommended or required by the traffic report should accompany the descriptions in the text. Having the written text and an image of the improvements facilitates reviewing and comparing the existing situation and proposed remedies.

g. Intersections should be designed to avoid "split-phased" operation.

We appreciate the opportunity to provide our comments.

Very truly yours,

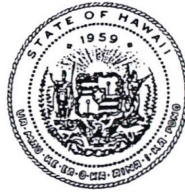


RODNEY K. HARAGA
Director of Transportation

Attachment

c: OEQC (G. Salmonson)
LUC (A. Ching; B. Saruwatari)
OP (L. Thielen; M.L. Kobayashi)
Helber, Hastert & Fee (C. Olson-Orr)

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

RODNEY K. HARAGA
DIRECTOR

Deputy Directors
BRUCE Y. MATSUI
LINDEN H. JOESTING
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.1162

May 20, 2004

Mr. Thomas A. Fee, AICP
Principal
Helber Hastert & Fee Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Fee:

Subject: Kapolei West
Draft Environmental Assessment, Pre-Assessment Consultation
TMK: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

Thank you for your letter of April 20, 2004, advising us of the proposed subject development project and environmental document. We have the following comments:

1. If highway improvements are being proposed, we would like to be apprised of such plans and schedules.
2. To facilitate our review of project and environmental documents, we request that four (4) copies of a full and standard-paged Traffic Impact Analysis Report (TIAR), including complete appendices showing calculation sheets and traffic counts, be provided, along with four (4) copies of any environmental assessment report. The TIAR should include a discussion on the linkages and connections the project's roadways will have with the overall integration of vehicle, transit, pedestrian and bikeway traffic for the area and, as necessary, contingent or interim mitigation measures as the project progresses in phases and/or increments.
3. Proposed plans for any road crossing of the OR & L right-of-way (ROW), easement rights or need for access into any of our highway ROW will need our review and approval, and may be subject to documentation and consideration of payment requirements.
4. Design of the Leeward Bikeway in the OR & L ROW between Ewa and Lualualei may begin within a year and construction may begin in 2007. Because the proposed subject development abuts the OR & L ROW, we request that the developer consider participating in improvements in and/or connecting to the ROW along their common boundary.

Mr. Thomas A. Fee, AICP
Page 2
May 20, 2004

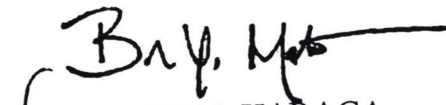
STP 8.1162

5. The proposed subject development will be subject to the impact fees under Chapter 33A, Revised Ordinances, City and County of Honolulu. The timetable of development, construction and occupancy for the project through full build-out should be outlined so that the project's contribution of its fair share for regional highway improvements can be reviewed.

The development will have an impact on the Kapolei-Ko'Olina Area, Ewa Region and adjacent communities connected by the H-1 corridor. As an interested party, we appreciate being informed in advance and for the opportunity to provide our comments.

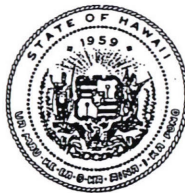
We look forward to receive further information on the subject development.

Very truly yours,


RODNEY K. HARAGA
Director of Transportation

DS:km

c: Mr. Anthony Ching, Land Use Commission
Mr. Eric Crispin, Department of Planning & Permitting



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

RODNEY K. HARAGA
DIRECTOR

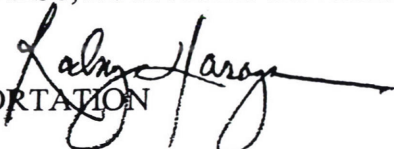
Deputy Director
BRUCE Y. MATSUI
BARRY FUKUNAGA
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.1498

December 14, 2004

TO: MARY LOU KOBAYASHI, ADMINISTRATOR
OFFICE OF PLANNING
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

FROM: RODNEY K. HARAGA 
DIRECTOR OF TRANSPORTATION

SUBJECT: AINA NUI CORPORATION, PETITION FOR AMENDMENT TO
STATE LAND USE DISTRICT BOUNDARIES, DOCKET NO. A04-753 –
KAPOLEI WEST
TMK: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

In reply to your request for our review of the subject petition, we have the following comments on the proposed development project presented in the petition:

1. Our transportation facilities will be affected by the project and our earlier comments provided to the petitioner's consultant in our letter STP 8.1162 dated May 20, 2004 (copy attached), are still valid and applicable. We are awaiting submittal of a traffic impact analysis report (TIAR); and anticipate that we will have additional comments after we have an opportunity to review the TIAR.
2. The project is not within the airport noise contours of our airports on Oahu, which would require noise mitigation or aviation easements. However, the project site is subject to aircraft overflights and the petitioner should disclose and advise occupants of such occurrences by aircraft.
3. In addition to our departmental review and approval, we understand that work within the OR & L railroad right-of-way will need prior review by the Railroad Society and Historic Preservation Office.
4. Use and occupancy agreements will be required for all project utilities within our highway right-of-ways and the railroad right-of-way.
5. Storm and surface water drainage from the area has already affected our harbor at Barbers Point. The drainage systems will need to prevent and/or control further runoff and flooding into the harbor. The drainage plans for the subject project should be submitted for our review and approval.

Ms. Mary Lou Kobayashi
Page 2
December 14, 2004

STP 8.1498

6. The petitioner's placement of a **portion** of its residential units directly next to our harbor will subject the residences and occup**ants** to dust, noise, fumes and lights from the maritime and related activities associ**ated** with the harbor's industrial activities. In particular, the residences will be in **close** proximity to a coral stockpile site. While our Harbors Division plans to develop a **buffer** zone around the coral stockpile, the petitioner should address this issue and provide for additional mitigation to protect its residents from dusty conditions.
7. The subject project is one of several **developments** proposed in the area. While this project and the other projects will **each** need their individual review and examination, there is need to review the collective and cumulative impact from all of these projects. Their timing and the placement and **schedule** of necessary transportation improvements that would be needed to accommodate the projects must be considered. The phasing of projects and improvements is a key **matter** requiring careful and thorough evaluation.

We appreciate the opportunity to provide **our** comments.

Attach.

DS:km

c: Genevieve Salmonson, Office of Environmental Quality Control
Bert Saruwatari, Land Use Commission
Donna Goth, Aina Nui Corporation

Helber Hastert & Fee

Planners, Inc.

June 2, 2005

Mr. Anthony J.H. Ching, Executive Officer
Land Use Commission
Department of Business, Economic Development and Tourism
State of Hawaii
P.O. Box 2359
Honolulu, HI 96804-2359



LAND USE COMMISSION
STATE OF HAWAII

2005 JUN -6 A 8:50

*Best-PR
Candy-File
EIS Comment*

Dear Mr. Ching:

**Kapolei West Expansion Area
Draft Environmental Impact Statement
Kapolei, 'Ewa District, O'ahu, Hawai'i**

Thank you for your letter to Ms. Donna Goth, President of Aina Nui Corporation, dated April 28, 2005 in response to the Kapolei West Expansion Area Draft Environmental Impact Statement (EIS). We have reviewed your comments and offer the following responses.

1. Faunal Resources

The avifaunal and feral mammal survey conducted in August 1989 by Phillip L. Bruner for the Kapolei Business-Industrial Park has been appended to the Final EIS as Appendix E. Also included in Appendix E is a written determination from Mr. Bruner to substantiate the validity of his previous findings. Sections 4.8.1 and 4.8.2 of the Final EIS have been revised to reference Mr. Bruner's written statement and address his findings.

2. Status of Hawaiian Cement Lease

Negotiations are underway between the Estate of James Campbell and Hawaiian Cement to terminate those portions of the option agreements that allow Hawaiian Cement to mine sand in the petition area earlier than the scheduled 2010 date. These option areas are not critical to Hawaiian Cement operations in the area.

3. Golf Course Conditions

Land Use Commission Docket No. A90-655/West Beach Estates Decision and Order establishes conditions for golf course operations, including community benefits which may include adequate golf tee times at affordable rates for public play as determined by the Office of State Planning and the City and County of Honolulu (Condition No. 3); compliance with "The Eight Conditions Applicable to This Golf Course Development: prepared by the State Department of Health dated April, 1990 (Condition No. 13); and employment of a qualified golf course manager to oversee golf course irrigation and maintenance (Condition No. 14). Discussion regarding the project's compliance with these conditions has been added to Section 4.5.3 and Section 6.8.3.

Helber Hastert & Fee

Planners, Inc.

Mr. Anthony Ching

June 2, 2005

Page 2

4. Mitigation Measures

The Final EIS has been re-organized to separate the discussion of potential impacts and mitigation. Previous statements that concluded no mitigation is necessary have been deleted from the applicable resource areas in Chapters 4.0 and 6.0, and replaced with new sections that describe the proposed mitigation measures (discussed in the DEIS under Probable Impact).

5. Applicant Signature

Pursuant to section 11-200-20(d), Hawaii Administrative Rules, Ms. Donna Goth, President of Aina Nui Corporation, will sign the Final EIS.

6. Governmental Approvals

Section 1.7 (page 1-7) has been revised to note that permits and governmental approvals required for the Proposed Action would be pursued following approval of the Land Use District Boundary Amendment Petition.

We appreciate your participation in this review process. Your letter and this response will be included in the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Thomas A. Fee, AICP
President

cc: Donna Goth, Aina Nui Corporation
Bert Saruwatari, Land Use Commission, State of Hawaii
Genevieve Salmonson, Office of Environmental Quality Control

**IMANAKA
KUDO &
FUJIMOTO**

A Limited Liability Law Company

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April J. Cadiz

Stephanie G. Uechi

Owen T. Iida

Of Counsel

R. Brian Tsujimura

Perfecto R. Yasay, Jr. *

* admitted to practice only in
New York and Philippines

Hon. Mario R. Ramil

Former Associate Justice
Hawaiian Supreme Court

Amfac Center, Hawaii Tower
745 Fort Street Mall, 17th Floor
Honolulu, Hawaii 96813
Phone (808) 521-9500
Facsimile (808) 541-9050
info@imanakakudo.com
http://www.imanakakudo.com

May 23, 2006

Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
Attn: Mr. Bert Saruwatari
State Office Tower
235 South Beretania Street, 4th Floor
Honolulu, Hawaii 96813

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Kapolei West Expansion Area Project**

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1	4/14/06 D 4/17/06 F	Notice of Imposition of Conditions By The Land Use Commission

Is/Are transmitted herewith...

- | | |
|---|--|
| ☒ For your information and file | ☐ For necessary action |
| ☐ For execution and return | ☒ Per your request |
| ☐ For execution and forwarding as noted below | ☐ For our conversation |
| ☐ For execution in <u>black</u> ink before a Notary Public | ☐ For payment |
| ☐ For review and comment | ☐ See remarks below |
| ☐ Approved as noted | |

REMARKS: Per your request, enclosed is a recorded copy of the Notice of Imposition of Conditions by the Land Use Commission.

Very truly yours,
IMANAKA KUDO & FUJIMOTO

By Cameron W. Nekota esq.
Cameron W. Nekota

Enclosure

Method of Delivery: ☐ Mail ☒ Hand Delivery ☐ Facsimile ☐ Other:

LAND USE COMMISSION
STATE OF HAWAII

2006 MAY 23 A 11: 56
TC has his own
copy



R-678

STATE OF HAWAII
BUREAU OF CONVEYANCES
RECORDED

APR 17, 2006 09:00 AM

Doc No(s) 2006-070825

/s/ CARL T. WATANABE
REGISTRAR OF CONVEYANCES

20 1/1 Z9

LAND COURT SYSTEM

REGULAR SYSTEM

AFTER RECORDATION: RETURN BY MAIL () PICK UP (X)

Benjamin A. Kudo, Esq.
Naomi U. Kuwaye, Esq.
745 Fort Street, 17th Floor
Honolulu, Hawaii 96813

Phone: (808) 521-9500

Tax Map Key Nos. (1) 9-1-14: Por. 33 and (1) 9-1-15: Por. 4 and Por. 20

Total Pages: 3

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DATED: Honolulu, Hawaii, April 14, 2006.

AINA NUI CORPORATION,
a Hawaii corporation

By  _____
DONNA GOTH
Its President

STATE OF HAWAII

)

) SS.

CITY AND COUNTY OF HONOLULU

)

On this 14th day of April, 2006, before me personally appeared DONNA GOTH, to me

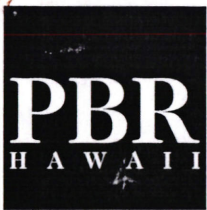
personally known, who, being by me duly sworn, did say that she is the President of the AINA NUI CORPORATION, a Hawaii corporation, and that the said instrument was signed on behalf of said corporation by authority of its Board of Directors, and that said officer acknowledged

of said corporation by authority of its Board of Directors, and that said officer acknowledged said instrument to be the free act and deed of said corporation.



Notary Public, State of Hawaii

My commission expires: 03-30-2007



LAND PLANNING
LANDSCAPE ARCHITECTURE
ENVIRONMENTAL STUDIES

WM. FRANK BRANDT, FASLA
CHAIRMAN

THOMAS S. WITTEN, ASLA
PRESIDENT

R. STAN DUNCAN, ASLA
EXECUTIVE VICE-PRESIDENT

RUSSELL Y.J. CHUNG, ASLA
EXECUTIVE VICE-PRESIDENT

VINCENT SHIGEKUNI
PRINCIPAL

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HILO OFFICE

GRANT MURAKAMI, AICP
SENIOR ASSOCIATE

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January 27, 2005

Sandy-Filc

LAND USE COMMISSION
STATE OF HAWAII

2005 JAN 28 P 5: 01

Mr. Anthony J. H. Ching, Executive Officer
State of Hawaii
Department of Business, Economic Development & Tourism
Land Use Commission
P. O. Box 2359
Honolulu, Hawaii 96804-2359

Attn: Bert Saruwatari

**SUBJECT: UNIVERSITY OF HAWAII – WEST OAHU
DRAFT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL
IMPACT STATEMENT PREPARATION NOTICE (EISPN)**

Dear Mr. Ching:

Thank you for your letter dated January 21, 2003. We have reviewed your letter and offer the following responses:

1. The Draft EIS will include an assessment of the impacts of the campus upon the remaining land uses constituting the East Kapolei project as well as proposed projects in the region, including Gentry Investment Properties' Ewa Makai development.
2. As recommended, the University of Hawaii will consult with the LUC regarding the recommendation to file a motion to amend the decision and order issued in LUC Docket No. A99-728/Housing and Community Development Corporation of Hawaii, State of Hawaii with the Land Use Commission pursuant to Subsection 15-15-70, Hawaii Administrative Rules.
3. We understand the LUC's desire to reserve further comments on the subject project pending your review of the Draft EIS. We will look forward to your comments at that time.

Again, thank you for your comments and your participation in the EIS process. If you have any questions, please do not hesitate to contact me.

Sincerely,

PBR HAWAII

Vincent Shigekuni
Principal



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

*Sandy-File EIS
Comment*

LINDA LINGLE
GOVERNOR

THEODORE E. LIU
DIRECTOR

MARK K. ANDERSON
ACTING DEPUTY DIRECTOR

LAURA H. THIELEN
DIRECTOR
OFFICE OF PLANNING

LAND USE COMMISSION
STATE OF HAWAII

2005 MAY 16 A 8-37

XCBS

Telephone: (808) 587-2846
Fax: (808) 587-2824

Ref. No. P-10932

May 13, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Honolulu, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West Expansion Area Draft Environmental Impact Statement (DEIS)

We have reviewed Aina Nui Corporation's DEIS supporting a Petition before the Land Use Commission (LUC) to reclassify 174.2 acres (Petitioner Area) from the State Land Use Agricultural District to the Urban District. The landowner intends to consolidate the Petition Area with a 372.6-acre land area reclassified to the Urban District in 1991 for the development of Phase II of the Ko Olina Resort. The combined acreages (546.8) will be used to develop a master planned residential and golf community that will include land uses consistent with the Hawaii State Plan, the Ewa Development Plan, and the initial Ko Olina Phase II plan.

The Ewa-Kapolei region has become Oahu's prime growth area in terms of population and development. This rapid growth is expected to continue well beyond 2020, and with or without the project, proposed roadway improvements will provide little relief to traffic congestion and traffic issues within this region unless employment traffic patterns change.

The DEIS Traffic Impact Assessment Report is not clear about the assessment of traffic conditions for the section of H-1 Freeway east of Makakilo and does not address the project's traffic impact on the rest of the freeway system beyond this intersection. The report relies on a number of transportation projects that have been planned for the Ewa District to accommodate projected increase in traffic to and within the Kapolei Area.

The traffic study determined the Level of Service (LOS) based on the ratio of the traffic volume to capacity (v/c), and the average delay per vehicle in seconds (ADPV) for existing and planned intersections within and outside of the project area. As noted on page 6-12 of the DEIS, planned development between 2003 and 2014 will result in a nearly evenly split for congested travel patterns between Honolulu and Kapolei via the H-1 freeway. According to the

information provided in the DEIS, at build-out by 2020, improvements/mitigation at most of the 10 key intersections analyzed in the traffic study will improve average delays per vehicle scenarios. Morning and afternoon peak-hour conditions at most of these intersections will be operating at LOS D.

We recommend that the FEIS include descriptions of the characteristics that define each of the six levels of service (LOS). These descriptions more readily convey the impact that project build-out will have on the quality of travel on the roads, and may be more comprehensible to the lay reader. For example at LOS D, traffic approaches unstable flow, with tolerable operating speeds, and fluctuations in volumes and temporary restrictions to flow may cause substantial drops in operating speeds. Providing the reviewer a description associated with each level of service category (A, B, C, D, E, F) improves the reader's understanding of existing and anticipated traffic conditions.

In the traffic report, "peak hour" describes Monday to Friday morning and afternoon traffic when work hours dictate or control when people will be using the roadways to and from work. We recommend the FEIS and future traffic studies include a section that examines existing conditions on a Saturday when traffic congestion may not be necessarily reserved to "peak hours", but at constant levels throughout the day. These conditions should be projected and described for build-out at (2020) as well.

The Project Area transit center is described as a use that will facilitate public transit and usage. The FEIS should discuss whether park and ride areas for both motor vehicles and bicycles would be provided at the transit center.

We recommend that while the project is still within its conceptual stage, that discussions begin with City and County transit officials to coordinate the developer's intention to design convenient pedestrian linkages from each residential parcel to city designated bus stops.

Why is the word "should" used instead of "will" as in *A network of bicycle lanes and greenways should link the residential area to the middle school and nearby elementary school*? Stating that lanes and greenways *will* link these areas implies a commitment on the part of the developer to develop the project to meet those objectives. As well as linking residential areas to the middle and elementary schools, we recommend that the bikeway network also be designed to link to the transit, commercial and park areas within the project, and the existing Ko Olina Resort.

More recently, bikeways and roadways shared with bicycles are being evaluated according to LOS ratings to determine the bicycle compatibility index (BCI) of certain roads and the comfort levels of bicyclists using those roads. We recommend that the FEIS include ratings of bikeways proposed within and around the Project Area at build-out. We recommend the following publication from the Federal Highway Administration - *Development of the Bicycle Compatibility Index* Publication No. FHWA-RD-98-072.

Ms. Donna Goth
Page 3
May 13, 2005

We have begun to observe a repetitive conclusion on the part of developers to state that some of the residences within their proposed developments will only be of interest to, or more marketable to part-time residents, and that this segment of the population would generate significantly fewer trips to and from the development. The Final EIS should look at similar developments that have purported to include residences marketable to a segment of the population identified as generating fewer trips, and if measurable, provide data from those developments to determine if part-time residents within those developments do generate fewer trips.

We recommend that the FEIS include a figure that illustrates and identifies by name the 2014/2020 roadway network superimposed on the Kapolei West master plan. For example, we note that the Traffic Impact Assessment Report Appendix J includes figure 1-1 that labels/names the existing and proposed road system in relation with the project. This figure, with the existing and proposed roadways clearly readable, should be included in the body of the FEIS to enable the reviewer to see the relationship of the proposed road system with the proposed land uses.

The OR&L ROW was placed on the National Register of Historic Places in 1975. The Petition Area straddles the Oahu Railway and Land Company Railroad Right of Way (OR&L ROW). From the information provided in the DEIS, it appears that the ROW extends from the proposed transit/mixed-use parcel to northeast of the 7th hole. According to the DEIS, the OR&L ROW and other significant historic sites identified within the Petition Area would not be affected by the proposed development.

It is our understanding that the train operates on Sundays only. The rides leave the station located at the end of Renton Road in Ewa at 12:30 pm and 2:30 pm. The ride crosses the Petition Area to Paradise Cove at Ko Olina and back in about 90 minutes. We encourage the landowner to enter into a discussion with the operators of the train to incorporate the Oahu Railway into the Kapolei West Community transportation options.

Thank you for including us in the Draft Environmental Assessment Pre-Assessment Consultation process. If you have any questions, please contact Judith Henry at 587-2803.

Sincerely,



Laura H. Thielen
Director

c: ✓ Anthony Ching, Land Use Commission
Ms. Corlyn Olson Orr, Helber Hasert & Fee, Planners
Office of Environmental Quality Control

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

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*Sandy Aye EIS
Comments*

LAND USE COMMISSION
STATE OF HAWAII

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MUFI HANNEMANN
MAYOR



EDWARD Y. HIRATA
DIRECTOR

TP3/05-98670R

May 6, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West Expansion Area

Thank you for the letter from Helber Hastert & Fee, Planners requesting our review of and comments on the draft environmental impact statement for the subject project. We have the following comments as the result of our review:

1. Section 2.0 PROJECT DESCRIPTION

• **2.1 LOCATION AND OWNERSHIP**

Figure 2 (Page 2-3) should show the tax map key for the Urbanized Area.

• **2.2 BACKGROUND**

In Table 4 (Page 2-5), the information for the Kapolei West (2004) proposal should specify what is proposed for the petition area.

2. Section 6.0 ASSESSMENT OF AFFECTED ENVIRONMENT, PROBABLE IMPACTS AND MITIGATION: PUBLIC FACILITIES AND SERVICES

• **6.1 TRANSPORTATION**

All roadways shown in Figures 11 (Page 6-2), 12 (Page 6-8), 13 (Page 6-9), 14 (Page 6-20), and 15 (Page 6-23) should be properly identified.

• **6.1.1.1 Existing Roadway System**

The description of the existing roadway system should indicate which roadways are proposed to be dedicated to the City.

- **6.1.1.3 Existing Traffic Conditions**

- **Public Transportation**

- The last sentence in this section (Page 6-5) should be revised to read that "TheHandiVan provides curb-to-curb service...."

- **6.1.2.1 Future Conditions Without the Proposed Action**
2014 Roadway Improvements (Pages 6-6 and 6-7)

- According to the City's Ewa Development Plan, Kamokila Boulevard should be connected to Roosevelt Avenue, Kamaaha Avenue should be connected to Fort Barrette Road and Kapolei Parkway should be connected to Fort Barrette Road. This should be reflected in Figure 12.

- **2020 Roadway Improvements** (Page 6-7)

- Figure 13 should reflect all of the improvements described in this section.

- **PUBLIC TRANSPORTATION** (Page 6-7)

- In accordance with the title of this section, the probable impacts on public transportation should be described.

- **2014 PEAK HOUR TRAFFIC CONDITIONS (WITHOUT PROJECT)**

- **Trip Generation** (Page 6-10)

- The impact on public transit trips should be described.

- **6.1.2.2. Future Conditions With and Without the Petition Area**
TRIP GENERATION (Page 6-13)

- The impact on public transit trips should be described.

- Table 13 (Page 6-15) and Table 14 (Page 6-17)

- The LOSs for the Kalaeloa Boulevard-Farrington Highway Morning Peak Hour Existing Condition are not consistent.

- **6.1.3 Mitigation Measures**

- Table 15 (Page 6-21) and Table 16 (Page 6-24)

- The intersections with LOS F present undesirable situations and measures should be identified to lessen these conditions.

3. APPENDIX J, TRAFFIC IMPACT STUDY

- The traffic signals proposed at Kapolei Parkway-Regional Commercial Center Driveway, Kapolei Parkway-Parcel A/B Access Roads, and Kapolei Parkway-Roads D/F are warranted based on Warrant #3, Peak Hour.

Ms. Donna Goth, President
Page 3
May 6, 2005

- For the trip generation analysis, a lower trip generation rate was used for part-time residents, based on a different Trip Generation land use rate (260). A full explanation to justify this action should be included.
- As one possible mitigation measure, the traffic signals in Kapolei should be coordinated for progression and interconnected.
- Figures S-1, S-2, 2-1, 2-3, 3-1, 3-2, 3-4, 3-5, 3-6, 4-1, 4-2, 5-1, 5-2, 6-1 and 6-2 should have the roadways properly identified.
- The "Urbanized Area" referred to in Tables S-2 and S-3 should be clarified.
- The LOSs for the Kalaeloa Boulevard-Farrington Highway Morning Peak Hour Existing Condition are not consistent in Tables S-2 and S-3.

Should you have any questions regarding these comments, please contact Faith Miyamoto of the Transportation Planning Division at 527-6976.

Sincerely,



EDWARD Y. HIRATA
Director

cc: Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control

Mr. Bert Saruwatari, Planner
Land Use Commission

Ms. Corlyn Olson Orr, Project Planner
Helber Hastert & Fee, Planners

BOARD OF WATER SUPPLY

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



May 4, 2005

2005 MAY 16 A 8:37

XC: BS

MUFI HANNEMANN, Mayor

EDDIE FLORES, JR., Chairman
HERBERT S. K. KAOPUA, SR.
DAROLYN H. LENDIO
RANDALL Y. S. CHUNG
SAMUEL T. HATA

RODNEY K. HARAGA, Ex-Officio
LAVERNE HIGA, Ex-Officio

CLIFFORD S. JAMILE
Manager and Chief Engineer

DONNA FAY K. KIYOSAKI
Deputy Manager and Chief Engineer

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Your Letter Received March 31, 2005 Regarding a
Draft Environmental Impact Statement (DEIS) for the Kapolei West
Expansion Area, TMKs: 9-1-014: 033, 9-1-15: 004 and 020

Thank you for the opportunity to comment on the proposed development in the Kapolei area.

We have the following comments:

1. The developer should submit a water master plan showing the water requirements for the proposed developments and proposed additional infrastructure requirements.
2. We request a confirmation and a firm commitment from Campbell Estate regarding the alignment of our proposed 24-inch R-1 recycled water main from the City of Kapolei through Kapolei West to the Barbers Point 215 non-potable reservoir.
3. The development plan should be approved by the Department of Planning and Permitting (DPP) before the Board of Water Supply processes the building permit on the proposed development. The availability of water will be confirmed when the building permit is approved.
4. The developer is subject to pay the applicable Water System Facilities Charges (WSFC), however, we reserve comments at this time until development plans are finalized.
5. The golf course and large landscaped areas shall be irrigated with non-potable water. This development should maximize the use of R-1 recycled water when it is available and as appropriate.
6. Please be advised the proposed development is subject to the Board of Water Supply's Cross-Connection Control and Backflow Prevention requirements prior to issuance of the Building Permit.

If you have any questions, please contact Joseph Kaakua at 748-5442.

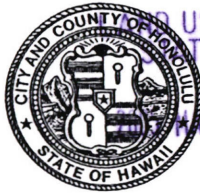
Very truly yours,

KEITH S. SHIDA
Principal Executive
Customer Care Division

cc: B. Usagawa, OEQC, Bert Saruwatari-Land Use Commission,
Corlyn Olson Orr, Helber Hastert & Fee, Planners

*Sandy
file
comments*

MUFI HANNEMANN
Mayor



LAND USE COMMISSION
OF HAWAII
MAY 16 A 8:38
xc: BS

ERIC S. TAKAMURA, Ph.D., P.E.
Director

KENNETH A. SHIMIZU
Deputy Director

PRO 05-011

May 5, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Blvd., Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West Expansion Area, Draft Environmental Impact Statement (EIS)

We have reviewed the subject Draft EIS, dated March 2005, and have the following comments:

1. In Section 6.3, Wastewater, on p. 6-29, there is a statement that the Honouliuli Wastewater Treatment Plant (WWTP) currently has a capacity of 38 mgd. Please note that although the capacity of the liquid treatment side of the WWTP is up to 38 mgd, the capacity of the solids handling side is limited to about 27 to 29 mgd. This limit of 27 to 29 mgd is only slightly more than the current flow. A City project to increase the solids handling capacity of the WWTP is being planned.
2. When developing the sewer master plan for this area, please ensure that all sewer mains are placed in roadways, not easements, to appropriately allow for future maintenance work by City crews.
3. Page 6-32, Figure 16: Provide either additional drainage maps or include runoff areas for Kapolei West in Fig. 16, including the coast line and Kalaeloa Harbor. Show the direction of flow from the development to the receiving waters, either the ocean or Kalaeloa Harbor.
4. Please address the impact on water quality of Kalaeloa Harbor. There is a need to implement measures to avoid having Kalaeloa Harbor added to the State's Clean Water Act Section 303(d) list of impaired water bodies, which already includes Honolulu Harbor, Pearl Harbor, and Kewalo Basin. Addressing drainage problems only locally is insufficient. There is a need for developments to master plan for drainage and pollution control over the complete area, including mitigation of sediment deposition and other pollution to Kalaeloa Harbor both during construction and after full development.

Should you have any questions, please call Jack Pobuk, Program Coordinator, at 692-5727.

Sincerely,

Dr. Eric S. Takamura, P.E.
Director

cc: OEQC
✓Land Use Commission
Helber Hastert & Fee, Planners

LINDA LINGLE
GOVERNOR



LAND USE COMMISSION
STATE OF HAWAII

STATE OF HAWAII
PUBLIC UTILITIES COMMISSION
DEPARTMENT OF BUDGET AND FINANCE
465 S. KING STREET, #103
HONOLULU, HAWAII 96813

Sandy-Aie EIS
Comments

CARLITO P. CALIBOSO
CHAIRMAN

WAYNE H. KIMURA
COMMISSIONER

JANET E. KAWELO
COMMISSIONER

April 29, 2005

Donna Goth
President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Re: Kapolei West Expansion Area Project ("Kapolei West Project") – Draft Environmental Impact Statement ("EIS") submitted pursuant to Hawaii Revised Statutes Chapter 343 and Hawaii Administrative Rules, Title 11, Chapter 200

In response to the draft EIS for the Kapolei West Project, particularly relating to **Section 6.6 POWER AND COMMUNICATIONS**, we offer the following comments:

1. **Section 6.6.1 Affected Environment** states, in relevant part, that "[Hawaiian Electric Company, Inc. ("HECO")] is also in the process of planning and design of a new substation in the Ko Olina development, immediately west of the Petition Area." It is our understanding that this new substation, described in Section 6.6.1, pertains to Docket No. 05-0056 that is currently pending before the Hawaii Public Utilities Commission ("HPUC"). In this proceeding, HECO requests, among other things, that the HPUC determine that the proposed construction of two (2) forty-six (46) kilovolt ("kV") subtransmission lines to feed the new Ko Olina substation be constructed above and below the surface of the ground, pursuant to HRS § 269-27.6(a). Pursuant to HRS § 269-27.5, the HPUC also conducted a public hearing on Wednesday, April 27, 2005 at Kapolei Elementary School Cafeteria to hear public comments, if any, for the overhead construction of 46kV subtransmission lines through a residential area.

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LAND USE COMMISSION
STATE OF HAWAII

Donna Goth
April 29, 2005
Page 2

2. **Section 6.6.2 Probable Impacts** states, in relevant part, that "[i]t is anticipated that HECO and Hawaiian Telephone Company (HTCO) would provide the necessary electrical and telephone service to the Petition Area." We note that Hawaiian Telephone Company is now known as Verizon Hawaii Inc. Pursuant to Decision and Order No. 21696, filed on March 16, 2005, in Docket No. 04-0140, the HPUC conditionally approved, among other things, a merger transaction which, upon closing, Verizon Hawaii Inc. will be replaced by Hawaiian Telcom, Inc.

We appreciate the opportunity to provide comments on the draft EIS for the Kapolei West Project. Should you have any questions, please do not hesitate to contact me directly at 586-2180.

Sincerely,



Kris N. Nakagawa
Chief Legal Counsel

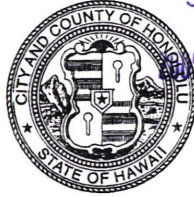
KNN:eh

c: Robert Alm, HECO
William Bonnet, HECO
Darcy Endo-Omoto, HECO
Joel Matsunaga, Verizon Hawaii Inc.
Alan Oshima, Hawaiian Telcom, Inc.
John Cole, Division of Consumer Advocacy
OEQC
Bert Saruwatari, LUC
Corlyn Olson Orr, Helber Hastert & Fee

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LAND USE COMMISSION
STATE OF HAWAII



MUFI HANNEMANN
MAYOR

APR 20 A 8 32



ATTILIO K. LEONARDI
FIRE CHIEF

JOHN CLARK
DEPUTY FIRE CHIEF

April 8, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Draft Environmental Impact Statement
Project: Kapolei West Expansion Area
Location: Kapolei, Oahu, Hawaii
Tax Map Keys: 9-1-014: Portion 033
9-1-015: Portions 004 and 020

We received a letter from Mr. Thomas A. Fee of Helber Hastert & Fee Planners, Inc., requesting that our comments on the above-mentioned project be submitted to you.

The Honolulu Fire Department (HFD) has no objections to the project, provided the following are complied with:

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

Ms. Donna Goth, President

Page 2

April 8, 2005

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of the 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section. 903.2 as amended)

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

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

Sincerely,



ATTILIO K. LEONARDI
Fire Chief

AKL/SY:bh

cc: Ms. Genevive Salmonson, Director
State of Hawaii, Department of Health, Office of Environmental Quality Control
Mr. Bert Saruwatari, Planner
State of Hawaii, Department of Business, Economic Development and Tourism
Land Use Commission
Ms. Corlyn Olson Orr, Project Planner
Helber Hastert & Fee Planners, Inc.



LAND USE COMMISSION
STATE OF HAWAII

2005 MAY 12 A 9:10

*Sandy-Ile EIS
Comments
Xc-Best*

May 6, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Re: Review Comments on the Draft Environmental Impact Statement (DEIS)
Dated March 10, 2005
Title of Project: Kapolei West Expansion Area
Location: Oahu, Ewa District

Dear Ms. Goth:

Thank you for this opportunity to present comments to the Draft Environmental Impact Statement for Kapolei West (the "EIS"). The Ko Olina Community Association is the master association for the Ko Olina Resort & Marina, which sits directly adjacent to the proposed development. Members within our Association include Marriott Hotels (operating the J.W. Marriott Ihilani Resort), Massachusetts Mutual (owner of the Ihilani Resort), Marriott Vacation Club International (owner and operator of the Ko Olina Beach Club timeshare), Almar Inc. (operators of the Ko Olina Marina), Ko Olina Golf Club, many other landowners, as well as all of the individual residents within the resort residential projects at Ko Olina. With that background, our comments are as follows:

1. General Failure to Adequately Address Impacts: As a general comment, many sections assessing impacts indicates "no mitigation required", as if the project is not responsible for addressing any impacts. Mitigation measures should discuss planned implementation of specific improvements required to adequately serve existing and projected developments. Additionally, as discussed in detail below, many matters raised in the EIS fail to address the environmental, social and economical impact of the proposed project on the region surrounding the project – including the Kapolei area and entire West Oahu region. It is difficult to assess the true impact of the proposed project without this information. Related to this issue is the lack of a sufficient analysis of alternatives to the proposed Project. There are alternatives that would address the issues raised below which must be examined in evaluating the impacts of the proposed project. In fact, the alternative of following the existing Development Plan is not adequately examined in the EIS.



2. **Regional Jobs:** Based on the elimination of planned industrial lands on the makai portion of the Project, and its conversion to golf course/buffer area, the EIS states that there will be a loss of 2,900 jobs to the region. In the growing West Oahu, jobs serve three key purposes (i) the development of the Kapolei region as a second city and cure the historical unemployment problems of the region; (ii) alleviating commuter traffic problems by providing a counterflow or non-flow of traffic on H-1; and (iii) creating a lifestyle to allow residents to live, work and play in the same community. Job creation within the region remains a key element of the planned development of Kapolei as a second city, and was the basis for the development of residential product around the City of Kapolei. The loss of 2,900 jobs is significant and, while the EIS argues that this will help ease traffic concerns in the immediate area, it (i) fails to address how the loss of these jobs will affect overall commuter traffic, as fewer area residents will be able to live and work in the same area; and (ii) fails to address how this job loss affects the development of the Kapolei region – in fact, the employment section of the EIS does not even address this proposed loss of 2,900 jobs. The loss of 2,900 jobs is not a positive impact, as the employment section attempts to summarily imply.
3. **Residential Development:** Analyzing the impacts of the proposed development must be couched within the overall plans to develop Kapolei and West Oahu. Importantly for Kapolei West is the need to understand that this development was originally planned to be phase II of Ko Olina Resort. This is significant because, as is evidenced by today's residential market developed within Ko Olina, resort residential developments, cause significantly less impact on infrastructure (including traffic, schools, etc.). Because the project is no longer being proposed as a part of the Ko Olina Resort, it is likely that its impacts on infrastructure will be greater than the alternative of developing Kapolei West as a second phase of Ko Olina Resort.
4. **Scenic and Visual Resources:** Statements in the EIS that views would not be obstructed should be further documented by visual aids, including views from Farrington Highway/H-1 and the existing developments of Ko Olina and Honokai Hale,. Given the changes proposed from the original master plan of the area, this information must be presented in this EIS. Without such information, it is impossible to adequately evaluate the impacts of the proposed project.
5. **Transportation:** Transportation issues for any West Oahu development are important, and the EIS fails to adequately address these concerns:
 - a. **Regional Traffic Impacts:** While the EIS discusses traffic impacts in the immediate vicinity of the project site, there is insufficient discussion of the larger regional context. The EIS fails to address the new population's impact on regional bottlenecks areas along H-1. The EIS must address



regional transportation issues and identify planned improvements that would adequately alleviate regional traffic congestion.

- b. Reliance on Possible Improvements: The EIS inappropriately relies on *possible* future roadway and traffic improvements. The EIS must more clearly state what improvements are assumed to be provided by the State or others and what the project will be funding. Without this information, it is not possible to evaluate the true impact of the proposed project.
 - c. Traffic Flow Assumptions: The traffic study projects a 50-50 split in traffic entering and exiting Kapolei West which does not seem to be plausible. The assumptions and rationale for this should be more clearly provided.
 - d. Industrial Traffic through Residential and Resort Areas: The proposed traffic flow would run traffic from Campbell Industrial Park and Campbell Business Park directly through the residential developments of the project and may encourage such traffic to continue through the region's resort development. This is a significant impact that must be examined and alternatives considered.
6. Schools: The Department of Education's plans to address projected overcrowding of schools in 2009, as shown in Table 21, are discussed in the EIS but there is no assurance that these plans will be completed by the time the proposed project is implemented. In fact, Kapolei High School is already over capacity. Commitments to participate in fair-share contribution programs and dedication of a middle school site are conceptually appropriate but do not assure impact mitigation.
7. Drainage: Given the size of the project area and the changes from the original regional master plan, a drainage plan should be presented to address how storm runoff will be accommodated to prevent off-site and down-gradient impacts.
8. Water Supply: A more specific plan for water system facilities should be presented in the EIS to determine what off-site improvements will be needed. The use of non-potable water should include a discussion of the impacts on the sustainable yield of the underlying caprock aquifer. Additionally, the EIS fails to address the need to require that non-potable water be used for landscaping within the project, especially for the multi-family developments – and not just the parks and golf course, as proposed in the EIS.



Thank you for the opportunity to provide these comments. We look forward to a response and to the EIS addressing these concerns and issues.

Sincerely,

Ko Olina Community Association
By: Kenneth Williams
Its: Vice President

c: The Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

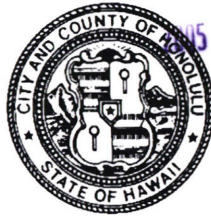
Land Use Commission, State of Hawaii
235 South Beretania Street, Suite 406
Honolulu, Hawaii 96813

Helber Hastert & Fee, Planners
Corlyn Olsen Orr, Project Planner
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 523-4564 • Fax: (808) 523-4567
Website: www.honolulu.gov

MUFI HANNEMANN
MAYOR



LAND USE COMMISSION
STATE OF HAWAII

MAY -2 P 1:39

WAYNE M. HASHIRO, P.E.
DIRECTOR

EUGENE C. LEE, P.E.
DEPUTY DIRECTOR

98525

April 29, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West Expansion Area, Ewa District, Oahu

Thank you for the opportunity to review and provide comments to the referenced draft environmental assessment (DEA). We offer the following comments.

We urge representatives of the developer to meet with us at their earliest convenience to discuss in greater detail how they propose to meet park dedication obligations to the City.

We note that the DEA report makes some statements about the intent of the developer to provide public and private parks and recreational land and facilities. The DEA also states that the developer intends to transfer the land title for the Kamokila Community Park to the City in partial fulfillment of park dedication obligations. We are generally in support of the plans proposed thus far for parks and recreational facilities. However, there may need to be more thought given to more specific park dedication requirements at this time.

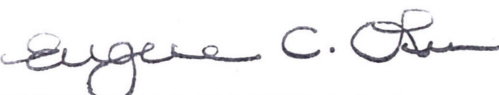
Consideration might be given to expand the nearly 6-acre Kamokila Community Park to ten acres, which would meet the City's recommended standard of ten acres in size for a community park. Alternatively, the park might be expanded to become a district park, 20 to 25 acres in size, and serving a population within a radius of two miles or more.

We generally desire that dedicated parks be roughly rectangular or square in shape so that their open space can be efficiently used. We often attempt to collocate district parks adjacent, or near to a public high school, and community or neighborhood parks near elementary or middle schools.

Ms. Donna Goth
Page 2
April 29, 2005

Should there be any questions, please contact Terry Hildebrand, Facilities Division, at 523-4696.

Very truly yours,


FOR WAYNE M. HASHIRO, P.E.
Director

WMH:ei

c: Genevieve Salmonson, Office of Environmental Quality Control
✓ Bert Saruwatari, Land Use Commission
Corlyn Olson Orr, Helber Hastert & Fee, Planners
Department of Parks and Recreation

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111

<http://www.honolulu.gov>

www.honolulu.gov

LAND USE COMMISSION
STATE OF HAWAII

APR 26 A 7:57

MUFI HANNEMANN
MAYOR



BOISSE P. CORREA
CHIEF

GLEN R. KAJIYAMA
PAUL D. PUTZULU
DEPUTY CHIEFS

OUR REFERENCE BS-KP

April 15, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Kapolei West Expansion Area project.

The Honolulu Police Department's (HPD) comments are recorded on pages 6-41 and 42. The project will result in a need for increases in staffing and facilities. The authors of the DEIS state that the HPD's need is a result of regional population growth and not the development of the Petition Area. They also conclude that "No mitigation is required." We will simply state again that increased resources will be required by the HPD to provide police services for this substantial development.

If there are any questions, please call Major Michael Tamashiro of District 8 at 692-4253 or Mr. Brandon Stone of the Executive Bureau at 529-3644.

Sincerely,

BOISSE P. CORREA
Chief of Police

A handwritten signature in blue ink, appearing to read "Karl Godsey", is written over the typed name.

By
KARL GODSEY
Assistant Chief of Police
Support Services Bureau

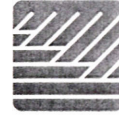
cc: Ms. Genevieve Salmonson, OEQC
✓ Mr. Bert Saruwatari,
Land Use Commission
Ms. Corlyn Olson Orr,
Helber Hastert and Fee, Planners

Serving and Protecting with Aloha

Helber Hastert & Fee
Planners, Inc.

HONOLULU POLICE DEPT.
CHIEF'S OFFICE

05 MAR 22 11 16



Dear Participant:

Attached for your review is a Draft Environmental Impact Statement (DEIS) that was prepared pursuant to the EIS law (Hawaii Revised Statutes, Chapter 343) and the EIS rules (Administrative Rules, Title 11, Chapter 200).

Title Of Project: Kapolei West Expansion Area
Location: Oahu, Ewa District
Tax Map Key Nos.:

Agency Action: _____ Applicant Action: X

YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY: MAY 6, 2005

Please send original comments to:

Applicant: **Aina Nui Corporation**
Address: 1001 Kamokila Boulevard, Suite 255, Kapolei, HI 96707
Contact: Donna Goth, President Phone: (808) 674-3540

Copies of the comments should be sent to:

The Office of Environmental Quality Control
Address: 235 South Beretania Street, Suite 702, Honolulu, HI 96813

Accepting Authority: **Land Use Commission, State of Hawaii**
Address: 235 South Beretania Street, Room 406, Honolulu, HI 96813
Contact: Bert Saruwatari, Planner Phone: (808) 587-3822

Consultant: **Helber Hastert & Fee, Planners**
Address: 733 Bishop Street, Suite 2590, Honolulu, HI 96813
Contact: Corlyn Olson Orr, Project Planner Phone: (808) 545-2055

Thank you for your participation in the EIS process. We look forward to receiving your comments, questions and suggestions.

Sincerely,

HELBER HASTERT & FEE, PLANNERS

Thomas A. Fee, AICP
President

Enclosure

ROBERT BUNDA
PRESIDENT
DONNA MERCADO KIM
VICE PRESIDENT
COLLEEN HANABUSA
MAJORITY LEADER
CLAYTON HEE
MAJORITY FLOOR LEADER
SHAN S. TSUTSUI
MAJORITY CAUCUS LEADER
FRED HEMMINGS
MINORITY LEADER
BOB HOGUE
MINORITY FLOOR LEADER
GORDON TRIMBLE
MINORITY POLICY LEADER

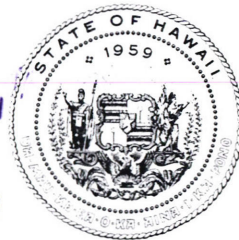
The Senate
The Twenty-Third Legislature

of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAII 96813

LAND USE COMMISSION
STATE OF HAWAII

2005 MAY 10 A 7:57

XC:BS



sandy - file EIS
Comments

May 6, 2005

Ms. Donna Goth
President
Aina Nui Corporation
1001 Kamokila Blvd., Suite 255
Kapolei, HI 96707

Dear Ms. Goth:

In accordance with HRS §343 and HAR §11-200, I am hereby submitting my comments on Aina Nui Corporation's petition to reclassify 174.2 acres from agricultural to urban. The petition seeks to effect the development of Kapolei West, a 546.8 acre residential and golf community.

My comments are as follows:

Comment #1: Significant economic impact of proposed development

Two-thousand-nine-hundred jobs will be lost because of the change of industrial lands to golf course/buffer area in makai portions of the development. Job creation was a key element of the planned development of Kapolei as a second city, and was the basis for the development of residential product around the City of Kapolei. The second city is to be a job center. This project turns Kapolei into a suburb. Another Hawaii Kai is not needed.

Comment #2: Traffic flow

The EIS is unclear regarding the traffic flow through West Kapolei. The proposal appears to provide for two new traffic signal points along Farrington Highway — one at Koio Drive and one on the east end of Kamokilo Park. This would create four signals within a very short stretch of Farrington Highway. Do not create more stop signals on Farrington Highway. It would make more sense to use those existing locations to provide connection from West Kapolei development to Farrington Highway. This would avoid safety issues and traffic flow issues for the planned resort community and the rest of the Waianae Coast. When placing a non-resort residential project adjacent to a resort, resort roads should not be used as a main thoroughfare for daily residential traffic.

FIRST DISTRICT
LORRAINE R. INOUE
SECOND DISTRICT
RUSSELL S. KOKUBUN
THIRD DISTRICT
PAUL WHALEN
FOURTH DISTRICT
SHAN S. TSUTSUI
FIFTH DISTRICT
ROSALYN H. BAKER
SIXTH DISTRICT
J. KALANI ENGLISH
SEVENTH DISTRICT
GARY L. HOOSER
EIGHTH DISTRICT
SAM SLOM
NINTH DISTRICT
LES IHARA, JR.
TENTH DISTRICT
BRIAN T. TANIGUCHI
ELEVENTH DISTRICT
CAROL FUKUNAGA
TWELFTH DISTRICT
GORDON TRIMBLE
THIRTEENTH DISTRICT
SUZANNE CHUN OAKLAND
FOURTEENTH DISTRICT
DONNA MERCADO KIM
FIFTEENTH DISTRICT
NORMAN SAKAMOTO
SIXTEENTH DISTRICT
DAVID Y. IGE
SEVENTEENTH DISTRICT
RON MENOR
EIGHTEENTH DISTRICT
CLARENCE K. NISHIHARA
NINETEENTH DISTRICT
BRIAN KANNO
TWENTIETH DISTRICT
WILL ESPERO
TWENTY-FIRST DISTRICT
COLLEEN HANABUSA
TWENTY-SECOND DISTRICT
ROBERT BUNDA
TWENTY-THIRD DISTRICT
CLAYTON HEE
TWENTY-FOURTH DISTRICT
BOB HOGUE
TWENTY-FIFTH DISTRICT
FRED HEMMINGS
CHIEF CLERK
PAUL T. KAWAGUCHI

Comment #3: Additional traffic/transportation concerns

The EIS does not address the traffic concerns that will be caused by the reclassification and rezoning of the area. Traffic impact, both for daily commuter traffic on H-1 and "community" traffic in and around Kapolei, will be significant. The EIS fails to provide any real answers as to what improvements will be made to address this already existing and growing problem. While the EIS attempts to address the issue with the justification that new jobs in Kapolei will alleviate these problems, (i) there is no evidence that there will be enough job growth in Kapolei to offset this new population and (ii) as was previously mentioned, the loss of 2,900 planned industrial jobs must be overcome. Without any net increase in jobs, the development of this residential project will significantly impact traffic problems.

Comment #4: Development of resort residential

Analyzing the proposed development must be couched within the overall plans to develop Kapolei and West Oahu. Importantly for West Kapolei is the need to understand that this development was originally planned to be part of the expansion of the developing Ko Olina Resort. This is significant, because as originally planned, as a resort residential development, the impact on infrastructure (including traffic, schools, etc.) by resort residential projects is significantly less than the impact caused by "regular" residential development as is being proposed in the EIS.

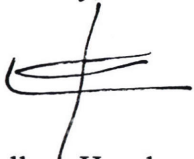
Comment #5: Impact on the master plan

Kapolei is the second city, a master planned community. The EIS fails to discuss how this significant change will affect the balance struck in the planning of Kapolei. A discussion is necessary as to whether this request is merely profit driven.

In addition to these five concerns, I also question the detrimental reliance issues that may arise as a result of these proposed changes.

Thank you for allowing me to comment. Should you have any questions or require further comment, please contact me at 586-7793.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colleen Hanabusa', with a stylized flourish at the end.

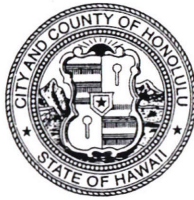
Colleen Hanabusa
Senator, Twenty-First District

cc: The Office of Environmental Quality Control
State of Hawaii Land Use Commission
Corlyn Olson Orr – Helber, Hastert & Fee

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4432 • FAX: (808) 527-6743
DEPT. INTERNET: www.honolulu.gov • INTERNET: www.honolulu.gov

MUFI HANNEMANN
MAYOR



*Sandy file
EIS comment
XC-Bert*
LAND USE COMMISSION
STATE OF HAWAII
HENRY ENG, FAICP
DIRECTOR
2005 MAY -6 P 4:01
DAVID R. TANQUE
DEPUTY DIRECTOR

2005/ELOG-641 (RYS)

May 5, 2005

Mr. Thomas A. Fee, AICP
President
Helber Hastert & Fee, Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Attn: Corlyn Olson Orr, Project Planner

Dear Mr Fee:

Kapolei West Expansion Area Project, Ewa, Oahu, Hawaii
Draft Environmental Impact Statement (DEIS)
TMK: 9-1-014: por.033; 9-1-15: por. 004, and por. 20

This is in response to your request (received on March 24, 2005) for comments on the Draft Environmental Impact Statement (DEIS) dated March 2005 for the proposed Kapolei West Expansion Area Project, which you are preparing in support of Aina Nui Corporation's petition to the Land Use Commission to reclassify approximately 174.2 acres of land from the State Agricultural Land Use District to the Urban District, and in support of zone change application to P-2 General Preservation and A-1 Low Density Apartment districts. We have reviewed the DEIS and offer the following comments for your review and consideration for inclusion in the Final Environmental Impact Statement (FEIS):

1. Section 1.9 Purpose and Need for This EIS on page 1-9: The applicant's stated intent to use this EIS "to satisfy the City and County of Honolulu's 'significant' zone change requirement" is noted. However, the DPP reserves the right to require additional information with the zone change application that may not be necessary for the impact statement.
2. Section 2.4 Project Description.
 - Low and Medium Density Residential on page 2-9: A graphic showing the location of the proposed low and medium density residential dwelling units

described in the narrative on the bottom of page 2.9; and the justification of the low density of the residential development where densities as low as 1 unit/acre are being proposed in the secondary urban center where growth is being directed should be included.

- Parks on page 2-10: The text describes two parks in the Petition area – a 14.3-acre park south of the OR&L Right-of-Way (ROW) and a 2.8-acre passive park adjacent to the golf course south of the OR&L ROW. However, the discussion of community-based parks on page 3-29 and in Section 6.8.3 Mitigation Measures on page 6-41 refers to only one neighborhood-park. The discussion of proposed park(s) in the FEIS should be consistent. The Department of Parks and Recreation park classification (e.g. neighborhood, community, district) for each of the two parks proposed and for the existing Kamokila Park should be included.
- Vehicular/Pedestrian Access on page 2-11: The pedestrian corridor described in the second paragraph should be shown graphically, as well as the other proposed pedestrian routes and designated bike facilities.

Since Kapolei Parkway is planned to connect to Ali'i Nui Drive, the Final EIS should address how the different street names will be resolved as the City does not usually approve different names for the same length of right-of-way.

The DEIS states that no direct roadway connections would be made between Kapolei West and the adjacent communities of Honokai Hale and Nanakai Gardens in deference to strong community sentiment against adding additional traffic to their internal streets. Although these communities are outside the petition area, roadway connections to Kapolei West should be further studied in the FEIS.

Adherence to the "Smart Growth" connectivity principle of a collector/connector road approximately every quarter mile would suggest that additional east-west road links would be warranted. One possibility is a connector from Koio Drive east to Road "D" south of Nanakai Gardens/Honokai Hale. An additional east-west road link to Ko Olina and Kalaeloa Harbor (f.k.a. Barbers Point Harbor) should be considered since nearly 49 percent of Kapolei West residential development is planned to occur within the petition area, and the Traffic Impact Analysis Report clearly indicates the capacity of the Kalaeloa Boulevard/ Kapolei Parkway intersection will be exceeded at build out of both the Urbanized and the Petition areas of the planned Kapolei West development.

- The proposed residential area at the end of Road D appears inappropriate. It is “sandwiched” between the I-3 waterfront industrial district of Kalaeloa Harbor and the resort area of Ko Olina. Alternate uses should be considered.
3. Section 2.5 Project Phasing on page 2-12: The phasing plan description needs better details and should be coordinated with the roadway improvement schedule. A graphic showing what segments of proposed roadway within and without the project, along with estimated completion times, should be included as part of the traffic analysis. This would allow the reader to better understand how the project phasing is being coordinated with the roadway improvements.

Since the Kapolei Parkway extension to Ali'i Nui Drive is the region's and the development's principal east-west connector (for both the Urbanized Area and the petition area), DPP strongly believes that it should have a high priority for full and early completion rather than being completed in increments over a longer period.

4. Section 3.2.1. General Plan on pages 3-20 and 3-21: Please add the following updates to the discussion of GP policies:
- Policy 4 of Population Objective C: According to the City's *Annual Report on the Status of Land Use on Oahu for Fiscal Year 2003* (published September 2004), the 2025 residential population for the Ewa development plan area is projected to increase to 164,462, representing 15.3 percent of the island wide population. The FEIS should reflect that the updated estimate for the Ewa region's share will exceed the General Plan population distribution of 13 percent cited in Policy 4 of Objective C. The *Annual Reports* for FY 2000, 2002, and 2003 are posted on the DPP website at <http://honoluludpp.org/planning/>.
 - Policy 1 of Economic Activity Objective G: According to DPP's projections, the number of Ewa jobs is projected to increase from 17,000 jobs in 1990 to 49,500 and 65,000 in 2020 and 2030 respectively. The projections, which include military and construction workers on the job site in Ewa, will be posted on DPP's website under “Research and Statistics”, shortly.
 - Policy 3 of Housing Objective C: According to DPP's projections, over 33,400 new housing units are estimated for the Ewa DP area in 2020, and 48,700 additional units in 2030 (increase from 11,700 units in 1990 to 45,100 and 60,400 in 2020 and 2030, respectively).

5. Section 3.2.2.2 The Vision For Ewa's Future.

- Open Space and Greenways on page 3-25: Although parks and open space, including the golf course and multi-purpose pathways account for nearly 50 percent of the proposed uses, the location of the two parks south of the OR&L ROW do not support the Ewa DP guideline regarding the siting of parks at the center of neighborhoods to maximize accessibility (Section 3.3.2.1 on page 3-17 of the Ewa DP). These parks are located at the edge of Kapolei West adjacent to the golf course. The OR&L ROW may restrict access to these parks. The location of the parks within the Petition area should be justified.

Communities Designed to Support Non-Automotive Travel on page 3-27: DPP is concerned with the apparent lack of connections between the several residential areas. The proposed residential communities should incorporate design measures for their internal circulation systems to support pedestrian, bicycle and transit use. This will enable a true network to develop that will support non-automotive travel. DPP looks forward to seeing these linkages incorporated in the more detailed zoning and community development proposals as they emerge. Of special concern will be the proposed zoning near (i.e. within walking distance) the transit node at the southeast corner of the Urbanized Area.

- We note the decrease in proposed residential units from 3,500 to 2,370, which represents a departure from the Ewa DP. However, the geographic distribution and impact of this reduction in terms of how it impacts the quality, location, cost, densities, style, size and number of unit types (i.e. resident units compared to vacation units), delivery rate, and especially any impacts on required affordable units should be indicated.

6. Section 3.2.2.3 Land Use Policies, Principles and Guidelines.

- Residential Development on page 3-30 and 3-31: The DEIS should indicate how the proposed medium density housing units (10-15 units/acre) would relate to the major rapid transit line, or to the creation of transit oriented districts.
- Non-Residential Development on page 3-31: Given the petition area's strategic location in close proximity to Ko Olina Resort, Kalaeloa Harbor, the commercial center of the City of Kapolei, Kalaeloa and Campbell Industrial Park, it is critical that the proposed development have convenient linkage and access to these important job centers.

- School Facilities on page 3-35: The DEIS notes that the proposed middle school has not been co-located with a neighborhood or community park, and that siting focused on providing convenient access for regional traffic. An alternative approach would be to expand the residential area south of the OR&L ROW into the park area and to expand the proposed middle school site to include a community park in the residential area. This should not result in any loss of residential units.
7. Section 3.2.4 Special Management Area on page 3-38: Any development within the SMA with a valuation of \$125,000 or which may have a substantial adverse environmental or ecological effect must obtain approval of a Major Special Management Area Use Permit (SMP) from the Honolulu City Council before other permits and project construction may begin (Section 205A-22, HRS). The SMP for any uses not permitted by zoning must follow the rezoning needed.

We suggest you contact Nelson Armitage of our Land Use Permits Division, Zoning Regulations and Permits Branch, at 527-6274 if you have any questions about the SMP process.

8. Soils - Section 4.3.2 Probable Impacts on page 4-4:
- We suggest adding the following to the proposed additional erosion control best management practices: Sodding and plantings "shall be established on disturbed areas which are at final grade or will not be worked for longer than 14 days." (*DPP Rules Relating to Soil Erosion Standards and Guidelines*).
 - Grading and erosion control plans shall be performed in accordance with Chapter 14 (Public Works Infrastructure Requirements Including Fees and Services) of the ROH instead of Chapter 23 (Shoreline Setbacks) as listed on page 4-5.
9. Groundwater Resources - Section 4.5.2 Probable Impacts on page 4-12: Add the anticipated date for the filing of the "Application for Water Use Permit" with the Commission on Water Resource Management to the narrative, to confirm the adequacy of the potable water supply for the petition area.
10. Section 6.1 Transportation on pages 6-1 to 6-25:
- Many of the intersections analyzed will be operating at LOS E or F even with mitigation measures. Additional connectivity or improvements to the roadway/transit system should be considered to maintain a LOS of D or better. Perhaps, additional vertical connections to Farrington Highway would improve overall circulation during peak periods.

- There are two existing traffic signals at Farrington Highway along the Honokai Hale and Nanakai Gardens residential subdivisions. The signal at Nanakai Gardens is located near the Koio Road/Farrington Highway intersection. We suggest that emphasis be placed on signalizing Koio and eliminating the Nanakai Gardens signal to allow unlimited traffic movements from Koio. Unlimited access to Farrington Highway from Nanakai Gardens is available from the existing signal at Honokai Hale.
- An extension to Farrington Highway and an associated traffic signal should be considered for Road D as a temporary measure to help relieve congestion in the project as planning for the new Makaiwa Interchange proceeds to design.

11 Section 6.3 Wastewater:

- Section 6.3.1 Affected Environment on page 6-29: While the Honouliuli Wastewater Treatment Plant has a liquid treatment capacity of up to 38 mgd, the solids handling capacity is limited to about 27 to 29 mgd. The solids handling limit is only slightly more than the current flow into the facility. The solids handling capacity will be increased under the proposed "Honouliuli Wastewater Treatment Plan Solids Handling System" project, which is tentatively scheduled for completion in 2007.
- Section 6.3.2 Probable Impacts on page 6-30: Approvals of a wastewater master plan, sewer connection, and plan review are all required. Include the entire Kapolei West area and an offsite sewer study in the master plan. Review of the master plan will determine the available wastewater capacity for the Kapolei West project.

The apartment rate for calculating average flow was used for all 11 low-density residential and 1,143 medium-density residential units. The average flow for the housing products, which included both multi-family and single family units, should be recalculated. Table 17 should also include wastewater flows from schools, parks, golf courses, and commercial areas. Please include the calculated peak flows in Table 17.

You may call Ms. Tessa Ching of our Wastewater Branch at 523-4956 if you have any questions.

12. Section 6.5 Solid Waste on pages 6-35 and 6-36: More details should be provided as to how the applicant will be ensuring that its tenants and new owners will be participating in recycling activities. For example, what are some of the design elements that need to be incorporated in commercial buildings and site plans, and housing projects that promote recycling and re-use?
13. Section 6.8 Parks and Recreational Facilities – on pages 6.39 to 6.41: The DEIS should be revised as follows: The 9.5 acres in Table 26 appears low given DPR park area guidelines (two acres per 1,000 residents). This appears to be based on an average ratio of two persons per housing units, which is too low.

DPP estimates of the average household size for the Ewa DP area range from 3.25 in 2005 to 3.34 in 2030. Table 8 on page 5.2 of the DEIS also reflects an average person per unit ratio over three (68,718 residents divided by 20,804 units) for the Ewa DP area in 2000. Table 26 and the narrative in Section 6.8.3 Mitigation Measures should be revised accordingly. DPP's "Year 2030 Forecast of Household Size Distribution by DP Area" will be posted on our website under "Research and Statistics" shortly.

Plans should provide for an integrated pedestrian and bikeway network that links residential areas with parks, and provide opportunities for residents to meet and interact near the center of each community or housing group to optimize accessibility by residents.

14. The following editing changes are suggested:

- Add "(Appendix A)" after "... Ko Olina Phase II)" in Section 1.1. Introduction.
- Figure 1 Location Map on page 2-2: include an inset map showing the petition area's location on the island of Oahu.
- Vehicular/Pedestrian Access on page 2-11: add the proposed "Roads D, F, and G" to the Project Master Plan map in Figure 3 and a reference should be made in the text.

Labeling should be consistent, i.e. the text on page 2-11 refers to the "Development Concept Plan", whereas Figure 3 on page 2-7 is named "Project Master Plan".

Road "D" will intersect with the H-1 Freeway instead of Farrington Highway as it is stated in the second paragraph.

Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.
May 5, 2005
Page 8

- Section 11.0 References: the DPP reference number for the letter dated December 19, 2003, should be 2003/ELOG-3592 vice 3594 as listed.

Should you have any questions, please contact Ray Sakai of our staff at 523-4047.

Sincerely yours,



HENRY ENG, FAICP
Director of Planning and Permitting

HE:js

cc: Aina Nui Corporation
State Land Use Commission
Office of Environmental Quality Control

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LINDA LINGLE
GOVERNOR



LAND USE COMMISSION
STATE OF HAWAII

DEPARTMENT OF HUMAN SERVICES
HOUSING AND COMMUNITY DEVELOPMENT CORPORATION OF HAWAII
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

April 28, 2005

Sandy file BS comments

STEPHANIE AVEIRO
EXECUTIVE DIRECTOR

PAMELA Y. DODSON
EXECUTIVE ASSISTANT

IN REPLY REFER TO:

05:DEV/0193

2005 MAY 10 A 7:56
XC:BS
LAND USE COMMISSION
STATE OF HAWAII

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West Expansion Area, Ewa, Oahu, Hawaii
Draft Environmental Impact Statement

The Housing and Community Development Corporation of Hawaii (HCDCH) has reviewed the Draft Environmental Impact Statement (DEIS) dated March 2005 for the subject Petition Area. We note that the Petition Area is projected to provide 1,150 residential units, of which 510 is generally oriented to the primary residential market and 640 units generally oriented toward resort/second homebuyers. We note that the development would provide affordable housing opportunities in accordance with applicable City and County of Honolulu affordable housing requirements.

There is currently a great need for affordable housing in the state, and we certainly welcome the opportunity for the development of affordable housing by the private sector. The DEIS has not quantified the number of housing units that qualify as affordable housing units under the City and County of Honolulu affordable housing requirements and therefore, we suggest that the final environmental impact statement consider the inclusion of any discussion with the City and County of Honolulu on the potential number of affordable housing units that will be contributed by this development.

Thank you for the opportunity to comment.

If there are any questions regarding this matter, please call Leo Domingo, Project Coordinator, at 587-3170.

Sincerely,

Stephanie Aveiro

Stephanie Aveiro
Executive Director

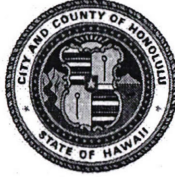
- c: The Office of Environmental Quality Control
✓ Land Use Commission, State of Hawaii
Helber Hastert & Fee, Planners

DEPARTMENT OF PARKS AND RECREATION

CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 309 • KAPOLEI, HAWAII 96707
PHONE: (808) 692-5561 • FAX: 692-5131 • INTERNET: www.honolulu.gov

MUFI HANNEMANN
MAYOR



LAND USE COMMISSION
STATE OF HAWAII

LESTER K. C. CHANG
DIRECTOR

DANA L. TAKAHARA-DIAS
DEPUTY DIRECTOR

2005 MAY 16 A 8:39

XCB

May 9, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Draft Environmental Impact Statement
Kapolei West Expansion Area

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement relating to Kapolei West Expansion Area.

The Department of Parks and Recreation is pleased that the proposed development incorporates significantly more land dedicated to park use than is required under the City's Park Dedication Ordinance, however, we generally recommend that as much of the dedicated park lands, as feasible, be combined into one contiguous property capable to supporting as many active recreational facilities as possible.

Before finalizing our comments, we would appreciate you providing us with a site plan of the proposed 2.78 acre passive park reflecting its location in relation to the proposed surrounding improvements and any comments you may have regarding how this small park will be serving the new community.

Should you have any questions, please contact Mr. John Reid, Planner, at 692-5454.

Sincerely,

A handwritten signature in black ink, appearing to read "Lester K. C. Chang".

LESTER K. C. CHANG
Director

LKCC:mk
(98774)

cc: The Office of Environmental Quality Control
Mr. Bert Saruwatari, Land Use Commission, State of Hawaii
Ms. Corlyn Orr, Helber, Hastert & Fee

LINDA LINGLE
GOVERNOR



**STATE OF HAWAII
DEPARTMENT OF EDUCATION**

P.O. BOX 2360
HONOLULU, HAWAII 96804

*Sandy - file
EIS comments
Ben-Pa*
PATRICIA HAMAMOTO
SUPERINTENDENT

OFFICE OF THE SUPERINTENDENT

2005 APR 15 A 7:48
LAND USE COMMISSION
STATE OF HAWAII

April 13, 2005

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West Expansion Area - Ewa, Oahu
Draft Environmental Impact Statement
TMK: 9-1-14: por. 33; and 9-1-15: por. 4 and por. 20

The Department of Education (DOE) has reviewed the Draft Environmental Impact Statement Preparation Notice (DEIS) for the 535-acre, master-planned golf and residential community located between the Ko Olina Resort and the City of Kapolei.

The DOE would like to correct an error in Section 6.7.1 Affected Environment of the DEIS, page 6-38. The section states that enrollments at Kapolei Middle and Kapolei High schools were presently over their 2003 facility capacity. The DEIS says both schools would be under capacity in 2009. Unfortunately, as shown in Table 21, on page 6-38. Both schools are currently over capacity and will remain over capacity according to projections for 2009.

An error was made in our November 30, 2004, memorandum to Mary Lou Kobayashi of the Office of Planning with comment on the Environmental Impact Statement Preparation Notice for the Kapolei West Expansion Area. The memo overstates the number of students projected to reside in multi-family housing. The error was corrected in Table 23, on page 6-39 of the DEIS.

To summarize, the enrollment in schools in the Kapolei area is close to or already exceeding facility capacity numbers. In the next five years, the enrollment is expected to increase further. A planned new elementary school will relieve some enrollment growth but there is a significant need for a new middle school in the area.

Ms. Donna Goth
Page 2
April 13, 2005

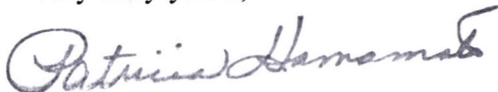
The DOE has been in discussions with Aina Nui Corporation and The Estate of James Campbell (Applicants) concerning our need for a middle school site to serve West Kapolei and its surrounding area. A donation of land for a middle school campus would address the DOE's school fair-share contribution amount for a project of roughly 2,370 new homes.

The decision and order by the State Land Use Commission in 1991 for the West Kapolei lands already in the urban district contains a school condition that requires Aina Nui to provide a contribution for school facilities. It would be beneficial to the DOE to have a similarly worded standard school fair-share condition placed on any new lands to be added to the West Kapolei project. We request use of the following standard fair-share language:

The Applicant shall contribute to the development, funding, and/or construction of school facilities, on a fair-share basis, as determined by and to the satisfaction of the Department of Education. Terms of the contribution shall be agreed upon in writing by the Applicant and the Department of Education prior to obtaining county rezoning.

The DOE appreciates the opportunity to express our concerns and requests a school fair-share contribution. If you have any questions, please call Rae Loui, Assistant Superintendent of the Office of Business Services, at 586-3444 or Heidi Meeker of the Facilities and Support Services Branch at 733-4862.

Very truly yours,



Patricia Hamamoto
Superintendent

PH:hy

c: Rae Loui, Asst. Supt., OBS
Mamo Carreira, CAS, Campbell/Kapolei/Waianae Complex Area
Genevieve Salmonson, Office of Environmental Quality Control
✓ Bert Saruwatari, State Land Use Commission
Corlyn Olson Orr, Helber Hastert & Fee

LINDA LINGLE
GOVERNOR OF HAWAII



Shady-file
GENEVIEVE SALMONSON
DIRECTOR

LAND USE COMMISSION
STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

2005 MAY -9 A 7:53
XC:BS

May 6, 2005

Ms. Donna Goth
'Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawai'i 96707

Mr. Anthony J. Ching
Land Use Commission, State of Hawai'i
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

Ms. Corlyn Olson
Helber Hastert and Fee, Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813

Dear Mesdames Goth and Olson, and Mr. Ching:

The Office of Environmental Quality Control has reviewed the draft environmental impact statement for the Kapolei West Expansion Area project, Tax Map Keys, 1st 9-1-14, portion 33; 9-1-15, portion 4 and portion 20, in the judicial district of 'Ewa, and offers the following comments.

1. CUMULATIVE AND SECONDARY IMPACT ANALYSES: In Section 7.2, please include the planned roadways found on pages 6-6 and 6-7 of the draft environmental impact in your analyses of secondary and cumulative impacts for the region.
2. SUSTAINABLE BUILDING GUIDELINES: Please refer to the Office of Environmental Quality Control Internet Site at <http://www.state.hi.us/health/oeqc/index.html> for sustainable building design guidelines for sustainable building design guidelines in your planning of the Kapolei West Expansion Area.

Thank you for the opportunity to comment. If there are any questions, please contact Mr. Leslie Segundo, Environmental Health Specialist, at (808) 586-4185.

Sincerely,

Genevieve Salmonson
GENEVIEVE SALMONSON
Director

LINDA LINGLE
Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-6600 Fax: (808) 973-9613

May 2, 2005

Sandy - file @ comments

SANDRA LEE KUNIMOTO
Chairperson, Board of Agriculture

DUANE K. OKAMOTO
Deputy to the Chairperson

Aina Nui Corporation
1001 Kamokila Boulevard
Suite 255
Kapolei Hawaii 96707

Attention: Ms. Donna Goth, President

Dear Ms. Goth

Subject: Draft Environmental Impact Statement – Kapolei West Expansion Area

The Department of Agriculture has reviewed the subject document and finds the proposed project will not adversely impact the agricultural activities and resources of the area or the programs, activities, and plans of the Department.

Should you have any questions, please call Earl Yamamoto at 973-9466 or email him at earl.j.yamamoto@hawaii.gov.

Sincerely,

Sandra Lee Kunimoto
Chairperson, Board of Agriculture

c: OEQC
State Land Use Commission
Helber Hastert and Fee, Planner

kapoleiwest2.e05



COPY

2005 MAY -3 P 2:37
LAND USE COMMISSION
STATE OF HAWAII



DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM

Strategic Industries Division

235 South Beretania Street, Leiopapa A Kamehameha Bldg., 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-3807
Fax: (808) 587-3820
Web site: www.hawaii.gov/dbedt/sid

Sandy file
LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
MARK K. ANDERSON
ACTING DEPUTY DIRECTOR

March 31, 2005

Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Honolulu, Hawaii 96707

Dear Ms. Goth:

Subject: Draft Environmental Impact Statement (DEIS)
Kapolei West Expansion Area

Thank you for the opportunity to comment on the DEIS for Kapolei West, a residential, golf course, and park project in Oahu, Ewa District. We have no further comments to those of November 28, 2004, on the EISPN.

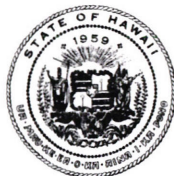
Sincerely,

Maurice H. Kaya
Chief Technology Officer

c: **State Land Use Commission**
Helber Hastert & Fee, Planners
OEQC

2005 APR -4 A 11:15
LAND USE COMMISSION
STATE OF HAWAII

LINDA LINGLE
GOVERNOR OF HAWAII



LAND USE COMMISSION
STATE OF HAWAII

Sandy-Filo
Ben Fil
GENEVIEVE SALMONSON
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

2005 MAR 17 P 2:21

March 15, 2005

Ms. Donna Goth, President
'Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawai'i 96707

Mr. Anthony Ching, Executive Officer
Land Use Commission, Department of Business, Economic Development and Tourism
State of Hawai'i
P.O. Box 2359
Honolulu, Hawai'i 96804-2359

Ms. Corlyn Olson Orr
Helber Hastert & Fee, Inc.
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813

Dear Mesdames Goth and Orr and Mr. Ching:

The Office of Environmental Quality Control has reviewed the distribution list for the Kapolei West Expansion Area, Tax Map Keys (1st) 9-1-14, portion of parcel 33, 9-1-15, portion of parcels 4 and 20, situated in the judicial district of 'Ewa. Pursuant to Section 11-200-20, Hawaii Administrative Rules, the Office of Environmental Quality Control verifies the accuracy of the submitted distribution list subject to the following clarification: the draft environmental impact statement will also be distributed on or before March 23, 2005.

If there are any questions, please call me at (808) 586-4185.

Sincerely,

A handwritten signature in black ink, appearing to read "Leslie Segundo".

Leslie Segundo
Environmental Health Specialist

Transmittal

To: Land Use Commission
235 South Beretania Street, #406
Honolulu, Hawaii 96813
Phone: 587-3822

~~LAND USE COMMISSION~~
STATE OF HAWAII

2005 MAR 11 A 10: 27

Attention: Bert Saruwatari

Date: March 11, 2005

Job Name: Kapolei West

Job No. 2003108

Copies	Date	Description
5	Mar 05	Kapolei West Expansion Area Draft EIS
1		OEQC Publication Form
1		Kapolei West Expansion Area DEIS Project Summary for Publication in the OEQC Environmental Notic March 23, 2005
1	Mar 05	Kapolei West Expansion Area DEIS Mailing List
1		DEIS Participant Cover Letter (Draft)
1		Cover Letter for LUC submittal to OEQC (Draft)
1		Diskette (MSword files for submittal to OEQC)

We transmit:

X Attached

☐ Under separate cover

Via:

 Mail

X Messenger

☐ Courier Service

 Blueprint Company

☐ Pick-Up

☐ Hand Delivery

Remarks:

The following:

X Documents

Correspondence

Plans

❑ Sketches/Renderings

 Photos

 Maps

 Brochures

Copies to:

Transmitted as noted:

☐ As requested

☐ For review and comment

☐ For your use/information

X For your records

X For distribution

☐ To be returned

☐ Returned as requested

By: Corlyn Olson Orr

Transmittal

To: Land Use Commission
235 South Beretania Street, #406
Honolulu, Hawaii 96813
Phone: 587-3822

~~LAND USE COMMISSION~~
STATE OF HAWAII

2005 MAR 11 A 10:27

Attention: Bert Saruwatari

Date: March 11, 2005

Job Name: Kapolei West

Job No. 2003108

Copies	Date	Description
5	Mar 05	Kapolei West Expansion Area Draft EIS
1		OEQC Publication Form
1		Kapolei West Expansion Area DEIS Project Summary for Publication in the OEQC Environmental Notic March 23, 2005
1	Mar 05	Kapolei West Expansion Area DEIS Mailing List
1		DEIS Participant Cover Letter (Draft)
1		Cover Letter for LUC submittal to OEQC (Draft)
1		Diskette (MSword files for submittal to OEQC)

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Remarks:

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Transmitted as noted:

☐ As requested

☐ For review and comment

☐ For your use/information

X For your records

X For distribution

☐ To be returned

☐ Returned as requested

☐

By: Corlyn Olson Orr

DRAFT – TO BE PRINTED ON LUC LETTERHEAD

March --, 2005

Honorable Genevieve Salmonson, Director
Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

**Draft Environmental Impact Statement for
Kapolei West Expansion Area,
Ewa District, Oahu, Hawaii**

We respectfully request publication of the Draft Environmental Impact Statement in the March 23, 2005 OEQC Environmental Notice. Attached please find the following items:

1. Four copies of the DEIS
2. Completed publication form
3. Completed DEIS Distribution Cover Letter to the participants
4. Completed DEIS Distribution List

If you have any questions regarding the EISPN, please call Bert Saruwatari of our staff at 587-3822.

Sincerely,

ANTHONY J. H. CHING
Executive Officer

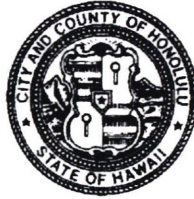
Attachments

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 523-4432 • FAX: (808) 527-6743
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

*Sandy-file
EIS
comment*

MUFI HANNEMANN
MAYOR



LAND USE COMMISSION
STATE OF HAWAII

2005 JAN 11 A 10:45

XC:BS

HENRY ENG, FAICP
ACTING DIRECTOR

DAVID K. TANOUÉ
DEPUTY DIRECTOR

2004/ELOG-2406 (RYS)

January 10, 2005

Mr. Thomas A. Fee, AICP
President
Helber Hastert & Fee, Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Attn: Corlyn Olson Orr, Project Planner

Dear Mr. Fee:

Additional Comments for Kapolei West, Ewa, Oahu, Hawaii
Environmental Impact Statement Preparation Notice (EISPN)

Please accept our apology for the inconvenience caused by this additional late comment. This is to supplement our comments forwarded to you in our November 17, 2004 response to your request, dated October 23, 2004, for comments on the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Kapolei West Project, which you are preparing for Aina Nui Corporation.

We offer the following comments for your review and consideration for inclusion in the Draft Environmental Impact Statement (DEIS):

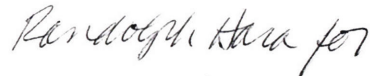
- Section 2.2 – Project Description on Page 10 - Circulation and Other Open Spaces: – “Vehicular access to Kapolei West is planned via a new segment of Kapolei Parkway connecting to Ali’i Nui Drive to the west and Kalaeloa Boulevard to the east.”, and Section 2.5 – Projected Project Phasing on page 13 – “The Kapolei Parkway would be constructed as development of adjacent lots occur.”

Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.
Page 2
January 10, 2005

Please expand the discussion to include the applicant's anticipated phasing plan for construction of the new roadway segment and the "adjacent lots."

We will reserve further comments for later after we review the completed DEIS. Should you have any questions, please contact Ray Sakai of our staff at 523-4047.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Henry Eng".

HENRY ENG, FAICP
Acting Director of Planning and Permitting

HE:js

cc: Aina Nui Corporation
State Land Use Commission
Office of Environmental Quality Control

p:\DivFunction\Ea-eis\2004\elog-2406(2).doc



LAND USE COMMISSION
STATE OF HAWAII

STATE OF HAWAII 2004 DEC 20 A 11: 58
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

Sandy-please file EIS comments
RODNEY K. HARAGA
DIRECTOR
xc Bert
Deputy Director
BRUCE Y. MATSUI
BARRY FUKUNAGA
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.1498

December 14, 2004

TO: MARY LOU KOBAYASHI, ADMINISTRATOR
OFFICE OF PLANNING
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

FROM: RODNEY K. HARAGA *Rodney Haraga*
DIRECTOR OF TRANSPORTATION

SUBJECT: AINA NUI CORPORATION, PETITION FOR AMENDMENT TO
STATE LAND USE DISTRICT BOUNDARIES, DOCKET NO. A04-753 –
KAPOLEI WEST
TMK: 9-1-14; por. 33; 9-1-15; por. 4 and por. 20

In reply to your request for our review of the subject petition, we have the following comments on the proposed development project presented in the petition:

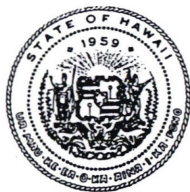
1. Our transportation facilities will be affected by the project and our earlier comments provided to the petitioner's consultant in our letter STP 8.1162 dated May 20, 2004 (copy attached), are still valid and applicable. We are awaiting submittal of a traffic impact analysis report (TIAR); and anticipate that we will have additional comments after we have an opportunity to review the TIAR.
2. The project is not within the airport noise contours of our airports on Oahu, which would require noise mitigation or avigation easements. However, the project site is subject to aircraft overflights and the petitioner should disclose and advise occupants of such occurrences by aircraft.
3. In addition to our departmental review and approval, we understand that work within the OR & L railroad right-of-way will need prior review by the Railroad Society and Historic Preservation Office.
4. Use and occupancy agreements will be required for all project utilities within our highway right-of-ways and the railroad right-of-way.
5. Storm and surface water drainage from the area has already affected our harbor at Barbers Point. The drainage systems will need to prevent and/or control further runoff and flooding into the harbor. The drainage plans for the subject project should be submitted for our review and approval.

6. The petitioner's placement of a portion of its residential units directly next to our harbor will subject the residences and occupants to dust, noise, fumes and lights from the maritime and related activities associated with the harbor's industrial activities. In particular, the residences will be in close proximity to a coral stockpile site. While our Harbors Division plans to develop a buffer zone around the coral stockpile, the petitioner should address this issue and provide for additional mitigation to protect its residents from dusty conditions.
7. The subject project is one of several developments proposed in the area. While this project and the other projects will each need their individual review and examination, there is need to review the collective and cumulative impact from all of these projects. Their timing and the placement and schedule of necessary transportation improvements that would be needed to accommodate the projects must be considered. The phasing of projects and improvements is a key matter requiring careful and thorough evaluation.

We appreciate the opportunity to provide our comments.

Attach.

c: Genevieve Salmonson, Office of Environmental Quality Control
Bert Saruwatari, Land Use Commission
Donna Goth, Aina Nui Corporation



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

RODNEY K. HARAGA
DIRECTOR

Deputy Directors
BRUCE Y. MATSUI
LINDEN H. JOESTING
BRIAN H. SEKIGUCHI

IN REPLY REFER TO:

STP 8.1162

May 20, 2004

Mr. Thomas A. Fee, AICP
Principal
Helber Hastert & Fee Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Fee:

Subject: Kapolei West
Draft Environmental Assessment, Pre-Assessment Consultation
TMK: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

Thank you for your letter of April 20, 2004, advising us of the proposed subject development project and environmental document. We have the following comments:

1. If highway improvements are being proposed, we would like to be apprised of such plans and schedules.
2. To facilitate our review of project and environmental documents, we request that four (4) copies of a full and standard-paged Traffic Impact Analysis Report (TIAR), including complete appendices showing calculation sheets and traffic counts, be provided, along with four (4) copies of any environmental assessment report. The TIAR should include a discussion on the linkages and connections the project's roadways will have with the overall integration of vehicle, transit, pedestrian and bikeway traffic for the area and, as necessary, contingent or interim mitigation measures as the project progresses in phases and/or increments.
3. Proposed plans for any road crossing of the OR & L right-of-way (ROW), easement rights or need for access into any of our highway ROW will need our review and approval, and may be subject to documentation and consideration of payment requirements.
4. Design of the Leeward Bikeway in the OR & L ROW between Ewa and Lualualei may begin within a year and construction may begin in 2007. Because the proposed subject development abuts the OR & L ROW, we request that the developer consider participating in improvements in and/or connecting to the ROW along their common boundary.

Mr. Thomas A. Fee, AICP
Page 2
May 20, 2004

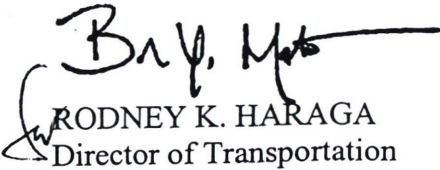
STP 8.1162

5. The proposed subject development will be subject to the impact fees under Chapter 33A, Revised Ordinances, City and County of Honolulu. The timetable of development, construction and occupancy for the project through full build-out should be outlined so that the project's contribution of its fair share for regional highway improvements can be reviewed.

The development will have an impact on the Kapolei-Ko'Olina Area, Ewa Region and adjacent communities connected by the H-1 corridor. As an interested party, we appreciate being informed in advance and for the opportunity to provide our comments.

We look forward to receive further information on the subject development.

Very truly yours,


RODNEY K. HARAGA
Director of Transportation

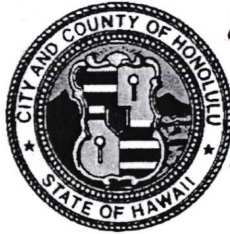
DS:km

c: Mr. Anthony Ching, Land Use Commission
Mr. Eric Crispin, Department of Planning & Permitting

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, KAPOLEI HALE, SUITE 215, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 692-5054 FAX: (808) 692-5857

LAND USE COMMISSION
STATE OF HAWAII



2004 DEC 10 A 8:20

XCBS

JEREMY HARRIS
MAYOR

LARRY J. LEOPARDI, P.E.
DIRECTOR AND CHIEF ENGINEER

JOSEPH MAGALDI
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 04-996

November 24, 2004

Ms. Donna Goth
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, HI 96707

Dear Ms. Goth:

Subject: Environmental Impact Statement
Preparation Notice (EISPN), Kapolei West

Thank you for the opportunity to comment on the subject EISPN. Although we have no comments to offer at this time, please keep us informed as your project continues.

Should there be any questions, please call me at 692-5054.

Very truly yours,

A handwritten signature in cursive script, reading "Larry Leopardi".

LARRY LEOPARDI, P.E.
Director and Chief Engineer

cc: Land Use Commission
Helber Haster & Fee, Planners, Inc.

Helber Hastert & Fee
Planners, Inc.

RECEIVED
ROAD DIVISION

2004 OCT 28 PM 2:31

04-1702
To: DRM
Due: 11/20/04

October 23, 2004

Dear Participant:



Attached for your review is an Environmental Impact Statement Preparation Notice (EISPN) which was prepared pursuant to the EIS law (Hawaii Revised Statutes, Chapter 343) and the EIS rules (Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Kapolei West
LOCATION: Oahu, Ewa District
TAX MAP KEY NOS.: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

**YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY NOVEMBER 22, 2004.
PLEASE SEND ORIGINAL COMMENTS TO THE:**

APPLICANT: Aina Nui Corporation
ADDRESS: 1001 Kamokila Boulevard, Suite 255, Honolulu, HI 96707
CONTACT: Donna Goth, President PHONE: (808) 674-3540

**COPIES OF THE COMMENTS SHOULD BE SENT TO THE OFFICE OF ENVIRONMENTAL
QUALITY CONTROL (235 South Beretania Street, Suite 702, Honolulu, HI 96813) AND
THE FOLLOWING:**

ACCEPTING AUTHORITY: Land Use Commission, State of Hawaii
ADDRESS: 235 South Beretania Street, Room 406, Honolulu, HI 96813
CONTACT: Bert Saruwatari, Planner PHONE: (808) 587-3822

CONSULTANT: Helber Hastert & Fee, Planners, Inc.
ADDRESS: 733 Bishop Street, Suite 2590, Honolulu, HI 96813
CONTACT: Corlyn Olson Orr, Project Planner PHONE: (808) 545-2055

If you have no comments but wish to receive a copy of the Draft EIS and participate in the environmental review process, please contact Corlyn Olson Orr at (808) 545-2055 or via e-mail at colsonorr@hhf.com.

Thank you for your participation in the EIS process. We look forward to receiving your comments, questions and suggestions.

Sincerely,

HELBER, HASTERT AND FEE, PLANNERS.

Thomas A. Fee, AICP
President

Enclosure

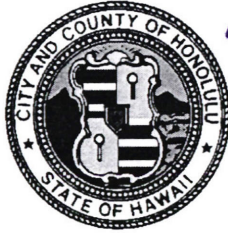
RECEIVED
OCT 27 A 9:32
OFFICE OF
ENVIRONMENTAL
QUALITY CONTROL

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, KAPOLEI HALE, SUITE 215, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 692-5054 FAX: (808) 692-5857

JEREMY HARRIS
MAYOR



2004 DEC 10 A 8:20

XCBS

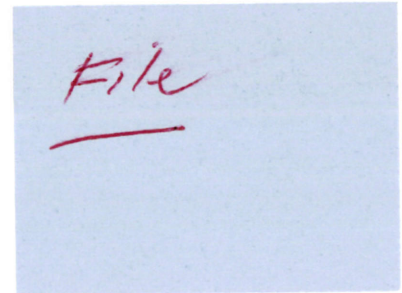
LARRY J. LEOPARDI, P.E.
DIRECTOR AND CHIEF ENGINEER

JOSEPH MAGALDI
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 04-996

November 24, 2004

Ms. Donna Goth
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, HI 96707



Dear Ms. Goth:

Subject: Environmental Impact Statement
Preparation Notice (EISPN), Kapolei West

Thank you for the opportunity to comment on the subject EISPN. Although we have no comments to offer at this time, please keep us informed as your project continues.

Should there be any questions, please call me at 692-5054.

Very truly yours,

A handwritten signature in black ink that reads "Larry Leopardi".

LARRY LEOPARDI, P.E.
Director and Chief Engineer

cc: Land Use Commission
Helber Haster & Fee, Planners, Inc.

Helber Hastert & Fee
Planners, Inc.

RECEIVED
ROAD DIVISION

2004 OCT 28 PM 2:31

04-1702
To: DRM
Due: 11/20/04

October 23, 2004

Dear Participant:



Attached for your review is an Environmental Impact Statement Preparation Notice (EISPN) which was prepared pursuant to the EIS law (Hawaii Revised Statutes, Chapter 343) and the EIS rules (Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Kapolei West
LOCATION: Oahu, Ewa District
TAX MAP KEY NOS.: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

**YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY NOVEMBER 22, 2004.
PLEASE SEND ORIGINAL COMMENTS TO THE:**

APPLICANT: Aina Nui Corporation
ADDRESS: 1001 Kamokila Boulevard, Suite 255, Honolulu, HI 96707
CONTACT: Donna Goth, President PHONE: (808) 674-3540

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QUALITY CONTROL (235 South Beretania Street, Suite 702, Honolulu, HI 96813) AND
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CONTACT: Corlyn Olson Orr, Project Planner PHONE: (808) 545-2055

If you have no comments but wish to receive a copy of the Draft EIS and participate in the environmental review process, please contact Corlyn Olson Orr at (808) 545-2055 or via e-mail at colsonorr@hhf.com.

Thank you for your participation in the EIS process. We look forward to receiving your comments, questions and suggestions.

Sincerely,

HELBER, HASTERT AND FEE, PLANNERS.

Thomas A. Fee, AICP
President

Enclosure

Helber Hastert & Fee, *Planners*

Sunday- Rile ES
Comments

~~10~~

Transmittal

To: Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804

LAND USE COMMISSION
STATE OF HAWAII

2004 NOV 30 A 8:08
XC: BS

Attention:	Bert Saruwatari
Job Name:	Kapolei West

Date: 29 November 2004
Job No. 2003108

[illegible]

We transmit:

☒ Attached
☐ Under separate cover

Via:

☒ Mail
☐ Messenger
☐ Courier Service
☐ Blueprint Company
☐ Pick-Up
☐ Hand Delivery

Remarks:

The following:

- ☒ Documents
- ☐ Correspondence
- ☐ Plans
- ☐ Sketches/Renderings
- ☐ Photos
- ☐ Maps
- ☐ Brochures
- ☐

Copies to:

Transmitted as noted:

☒ As requested
☐ For review and comment
☐ For your use/information
☐ For your records
☐ For distribution
☐ To be returned
☐ Returned as requested
☐

By: Corlyn Olson Orr

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2350
HONOLULU, HAWAII 96804

PATRICIA HAMAMOTO
SUPERINTENDENT

Advance Copy

OFFICE OF THE SUPERINTENDENT

November 30, 2004

MEMO TO: Ms. Mary Lou Kobayashi, Administrator
Office of Planning
Department of Business, Economic Development and Tourism

F R O M: Patricia Hamamoto, Superintendent
Department of Education

Subject: Environmental Impact Statement Preparation Notice and Petition for
Amendment to the State Land Use District Boundaries for Kapolei West,
Ewa, Oahu, TMK: 9-1-14: por. 33 and 9-1-15: por. 4 and por. 20

The Department of Education (DOE) has reviewed the Environmental Impact Statement Preparation Notice (EISPN) for the 535-acre, master-planned golf and residential community located between the Ko Olina Resort and the City of Kapolei.

The DOE used the number of single-family and multi-family units you supplied to project a possible student population of 1,278 students from kindergarten to grade 12. The students would be distributed between the following grade levels:

Estimated Student Population - Kapolei West

	Single Family Homes	Multi-Family Homes	Total
Number of units	870	1350	2220
Elementary (K-5)	243	377	619
Middle School (6-8)	124	193	317
High School (9-12)	134	208	342

Kapolei Middle and Kapolei High schools have 2004 enrollments that are higher than the schools' facilities capacity. Kapolei Elementary's enrollment is close to capacity and is expected to exceed capacity in the next few years. School enrollments, capacity and projected enrollments are shown:

Ms. Mary Lou Kobayashi
Page 2
November 30, 2004

Advance Copy

Capacity and Enrollment Projections for Selected Kapolei Complex Schools

	Capacity 2003	Actual Enrollment 2003	Actual Enrollment 2004	Projected Enrollment for 2009	2009 Projected Enrollment Less 2003 Capacity
Kapolei High	1,853	1,928	2,162	2,712	859
Kapolei Middle	1,387	1,698	1,699	1,715	328
Barbers Point	636	381	510	426	-210
Kapolei	1,198	1,165	1,187	1,246	48
Mehana				school opens	
Ko Olina Site				opening not determined	

The DOE is planning to open an elementary school within the City of Kapolei, in a project called Mehana. Present plans call for the school to open in the 2009-2010 school year. The DOE also has land set aside within the Ko Olina project which could become an elementary school following the opening of the elementary school in the Mehana site. Both schools could serve students living in West Kapolei.

The DOE is also planning to open another high school within the greater Ewa plains area. A location and time schedule have not been determined. The second high school will relieve the enrollment pressure on Kapolei High School.

With new elementary schools planned and a new high school anticipated in the long term, the remaining need for schools in the area is a middle school. The DOE has already raised this concern with you and your consultants. We have discussed the possibility of a middle school being located on the West Kapolei site currently identified for an elementary school. We believe we can agree on using the site to meet our middle school needs.

The Decision and Order by the State Land Use Commission (SLUC) in 1991 for the West Kapolei lands already in the urban district contains a school condition that requires Aina Nui to provide a contribution for school facilities. It would be beneficial to the DOE to have a similarly worded, standard school fair-share condition placed on any new lands to be added to the West Kapolei project. We also request use of the following standard fair-share language:

The Applicant shall contribute to the development, funding, and/or construction of school facilities, on a fair-share basis, as determined by and to the satisfaction of the Department of Education. Terms of the contribution shall be agreed upon in writing by the Applicant and the Department of Education prior to obtaining county rezoning.

Advance Copy

Ms. Mary Lou Kobayashi

Page 3

November 30, 2004

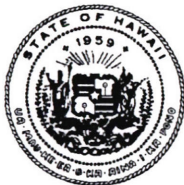
The DOE would like to request that the material concerning numbers of students living in Kapolei West and the current and projected needs for school facilities be included in the text of the Environmental Impact Statements and in the Findings of Fact in the SLUC's determination of Aina Nui's petition.

The DOE has no other comment or concern at this time. If you have any questions, please call Rae Loui, Assistant Superintendent of the Office of Business Services, at 586-3444 or Heidi Mecker, at the Facilities and Support Services Branch, at 733-4862.

PH:IIM:mp

c: Rae Loui, Office of Business Services
 Mamo Carreira, CAS, Campbell/Kapolei/Waianae Complex Area
 Bert Saruwatari, State Land Use Commission
 Corlyn Olson Orr, Helber Hastert & Fee, Planners, Inc.
 Genevieve Salmonson, Office of Environmental Quality Control
 Dr. Tom Saka, Office of Information Technology Services
 Donna Goth, Aina Nui Corporation

LINDA LINGLE
GOVERNOR

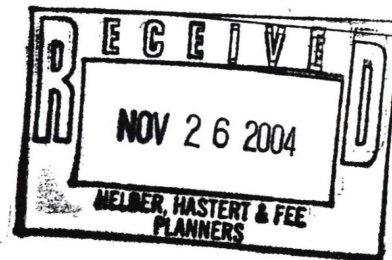


LILLIAN B. KOLLER, ESQ.
DIRECTOR

HENRY OLIVA
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
Benefit, Employment and Support Services Division
820 Mililani Street, Suite 606
Honolulu, Hawaii 96813

November 19, 2004



Aina Nui Corporation
Attn: Donna Goth, President
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Thank you for your letter dated October 23, 2004 regarding the Environmental Impact Statement Preparation Notice (EISPN) for the Kapolei West project.

We appreciate the opportunity to review the EIS; however, we will not be submitting any comments at this time. If you have any questions or concerns please contact Mr. Larry Higa, Oahu Section 2 Administrator, at 587-3309.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia Murakami".

Patricia Murakami
Division Administrator

c: Office of Environmental Quality Control
Land Use Commission, State of Hawaii
✓ Helber Hastert & Fee, Planners, Inc.

UNIVERSITY OF HAWAII

Environmental Center

November 22, 2004

EA: 0309

Ms. Donna Goth
Aina Nui Corporation
1001 Kamokila Boulevard
Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Environmental Impact Statement Preparation Notice
Kapolei West
Ewa, Oahu

'Aina Nui Corporation, an affiliate of the Estate of James Campbell, has filed a petition for a State Land Use District Boundary Amendment to reclassify approximately 174.2 acres of land from the Agricultural District to the Urban District (referred to as the "Petition Area") with the State Land Use Commission. The Petition Area is located in 'Ewa, O'ahu and consists of Tax Map Key parcels 9-1-14: 33 (por.), 9-1-15: 4 (por.), and 9-1-15:20 (por.). The Petition area straddles the State-owned, historic O'ahu Railway & Land Company (OR&L) Railroad right-of-way (ROW). Development proposed for the Petition Area (referred to as the Proposed Action) includes approximately 1,200 low and medium-density residential units, approximately 60 acres of golf course, and nearly 28 acres of park and open space.

The Petition Area is surrounded by the 372.6-acre area formerly known as Ko 'Olina Phase II to the north (urbanized in 1991 under Docket A90-655), Ko 'Olina Resort to the west, Kalaeloa Barbers Point Harbor and the Kapolei Business Park to the south, and the City of Kapolei and Kalaeloa Boulevard to the east.

The Petition Area is proposed to become part 'Aina Nui Corporation, and it includes a petition filed with the State Land Use Commission for a State Land Use District Boundary Amendment to reclassify approximately 174.2 acres of the project area from the Agricultural District to the Urban District. The Petition Area consists of Tax Map Key parcels 9-1-14: 33 (por.), 9-1-15: 4 (por.), and 9-1-15:20 (por.), and is located in the southern portion of the project, straddling the OR&L Railroad ROW.

Development proposed for the Petition Area includes approximately 1,200 low and medium-density residential units, approximately 60 acres of golf course, and nearly 28 acres of park and open space. The boundary amendment would allow development of the Petition Area and approximately 372.6 acres of land within the Urban District adjacent to the Petition

Ms. Donna Goth
November 22, 2004
Page 2 of 3

Area for the proposed Kapolei West project. In its entirety, The entire Kapolei West project is planned to include an 18-hole championship golf course, approximately 2,400 single and multi-family homes, neighborhood parks and a pedestrian pathway system to link the neighborhoods.

Regional commercial and transit/mixed-use areas are planned to enhance the City of Kapolei and support both the neighboring communities and the proposed Kapolei West community. Vehicular access to the project area is planned via a new segment of Kapolei Parkway connecting to Ali'i Nui Drive to the west and Kalaeloa Boulevard to the east; the proposed Hanua Street extension on the east; and a new roadway connected connecting to Farrington Highway to the west. Three new roadways, including two smaller neighborhood streets and the proposed Hanua Street extension, and two golf cart paths, are planned to cross the OR&L Railroad ROW.

Pursuant to Chapter 343, Hawai'i Revised Statutes, a Draft Environmental Impact Statement (DEIS) is being prepared for the project's proposed use of a historic site located on State lands (i.e., planned roadways cross the OR&L Railroad ROW, which is owned by the State of Hawai'i and listed on the National Register of Historic Places). The forthcoming DEIS will be organized to address both potential direct impacts and mitigation measures of the Proposed Action (i.e., reclassification of approximately 174.2 acres from the Agricultural to the Urban District) and the potential indirect and cumulative impacts associated with the larger, 547.8-acre West Kapolei project area.

This review was conducted with the assistance of Peter Flachsbar, Urban and Regional Planning; and Landin Johnson of the Environmental Center.

General Comments

The Environmental Impact Statement Preparation Notice (EISPN) appears to be prepared competently and touches on many points that an EISPN should. At this stage in the EIS process, there is limited content and specifics on which to comment. Consequently, our reviewers have only a few comments at this stage.

Specific Comments

Energy Consumption & Efficiency

Our reviewers believe the DEIS should thoroughly discuss the demands for electrical energy of this project, given that Hawaiian Electric Company (HECO) claims they have little spare capacity to generate more electricity at the present time. Our reviewers also strongly recommend the use of solar water heating and alternative energy systems (e.g., photovoltaic) for this project. The use of the alternative energy systems will undoubtedly help offset the power demand for the project and alleviate some of the concern as stated above. Other

Ms. Donna Goth
November 22, 2004
Page 3 of 3

energy conservation measures should be implemented in construction and design of the project (e.g., compact fluorescent lighting, light colored roofing, situating buildings to utilize any natural air flow for cooling, etc.).

Solid Waste

It is unclear whether the DEIS will quantify the solid waste generated by the 2,370 dwelling units in the project area (p. 7). This is a critical issue as the City & County of Honolulu is searching for a new landfill site.

Schools

As with the above comments, it is also unclear if the DEIS will quantify the number of school-age children and teenagers who will live there. This impact is also of concern as it is our reviewers' understanding that the existing schools are already overcrowded in Kapolei.

Landscaping

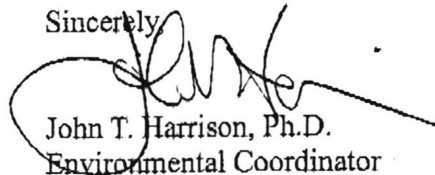
The use of native plants in landscaping, especially plants naturally acclimated to the project site's climate and consume a limited amount of water, is highly recommended by our reviewers. Drainage systems should also be designed to divert storm water to landscaping.

Water Use

The use of reclaimed water for the golf course and open space irrigation is strongly supported by our reviewers, but also recommend is the use in toilets, urinals, and landscaping where permitted. Other such water conservation measures should also be implemented in the project construction (e.g., low-flow toilets and shower heads, etc.).

Thank you for the opportunity to review this EISPN.

Sincerely,



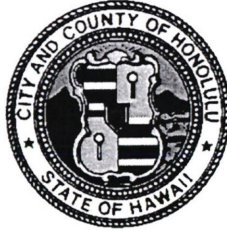
John T. Harrison, Ph.D.
Environmental Coordinator

Cc: Helber Hatert & Fee, Planners, Inc.
Land Use Commission
OEQC
James Moncur, WRRC
Peter Flachsbart
Landin Johnson

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, KAPOLEI HALE, SUITE 215, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 692-5054 FAX: (808) 692-5857



JEREMY HARRIS
MAYOR

LARRY J. LEOPARDI, P.E.
DIRECTOR AND CHIEF ENGINEER

JOSEPH MAGALDI
DEPUTY DIRECTOR

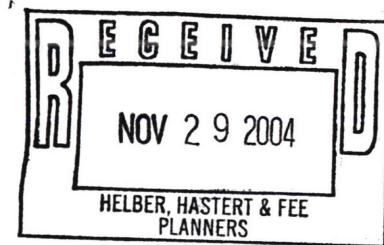
IN REPLY REFER TO:
DRM 04-996

November 24, 2004

Ms. Donna Goth
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, HI 96707

Dear Ms. Goth:

Subject: Environmental Impact Statement
Preparation Notice (EISPN), Kapolei West



Thank you for the opportunity to comment on the subject EISPN. Although we have no comments to offer at this time, please keep us informed as your project continues.

Should there be any questions, please call me at 692-5054.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Larry Leopardi".

LARRY LEOPARDI, P.E.
Director and Chief Engineer

cc: Land Use Commission
Helber Haster & Fee, Planners, Inc.

Sunday - file

Helber Hastert & Fee
Planners, Inc.

April 20, 2004

State of Hawaii
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, HI 96804

LAND USE COMMISSION
STATE OF HAWAII

2004 APR 21 A 10:43



Dear Sir or Madam,

Kapolei West, 'Ewa, O'ahu, Hawai'i
Draft Environmental Assessment Pre-Assessment Consultation

We have been contracted by Aina Nui Corporation, an affiliate of the Estate of James Campbell, to prepare the master plan and accompanying environmental assessment (EA) for the proposed Kapolei West development. Located between the Ko Olina Resort and the City of Kapolei in 'Ewa, O'ahu, Kapolei West is a master-planned golf/residential community planned on approximately 535 acres of land. The project master plan includes an 18-hole championship golf course with low and medium density residential uses to complement the existing Ko Olina Resort, and commercial uses within the eastern end of the project area to enhance the existing commercial and retail activity of the City of Kapolei.

The environmental assessment is being prepared in support of a State Land Use District Boundary Amendment petition to reclassify a portion of the project area from the State Land Use Agricultural District to the Urban District and a subsequent City and County of Honolulu Zone Change Application. This pre-assessment consultation is intended to ensure that interested parties are notified of the forthcoming Draft EA, and that all relevant environmental, economic and technical issues and concerns are identified and addressed. A brief description of the project and general information regarding the contents of the EA is enclosed for your consideration. Should you have any written comments, we invite you to submit them by May 5, 2004 to the following address:

Helber, Hastert and Fee Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813
ATTN: Kapolei West

Thank you for interest in this project. If you have any questions or concerns, or would like to be removed from our distribution list, please contact Corlyn Olson Orr, project planner, at 545-2055 or via e-mail at colsonorr@hhf.com.

Aloha,

Thomas A. Fee, AICP
Principal

Attachments

cc: Ms. Donna Goth, Aina Nui Corporation
Mr. Anthony Ching, Land Use Commission

Helber Hastert & Fee

Planners, Inc.

Kapolei West Draft Environmental Assessment

Pre-Assessment Consultation

April 20, 2004

Page 2 of 3

Distribution: Department of Agriculture, Soil Conservation Service
Department of the Army, Army Corps of Engineers
Department of the Army, Army Support Command Hawaii
Department of the Navy, Naval Base, Pearl Harbor
US Fish and Wildlife Service
Department of the Interior, US Geological Survey
US Federal Aviation Administration
US Federal Highway Administration
US Coast Guard
Department of Accounting and General Services
Department of Agriculture
Department of Budget and Finance
Public Utilities Commission
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University of Hawaii, Water Resources Research Center
Oahu Metropolitan Planning Organization
Board of Water Supply
City and County Department of Community Services
City and County Department of Design and Construction
City and County Department of Environmental Services
City and County Department of Facility Maintenance
City and County Department of Parks and Recreation
City and County Department of Planning and Permitting
City and County Department of Transportation Services
Honolulu Fire Department
Honolulu Police Department
Oahu Civil Defense Agency
Verizon Telephone
Hawaiian Electric Company
Gas Company
Sierra Club
Common Cause Hawaii
Hawaii Audubon Society
Hawaii's Thousand Friends

Helber Hastert & Fee

Planners, Inc.

Kapolei West Draft Environmental Assessment

Pre-Assessment Consultation

April 20, 2004

Page 3 of 3

Land Use Research Foundation
League of Women Voters
Outdoor Circle
Life of the Land
Hawaii Building & Construction Trade Council
Hawaii Farm Bureau Foundation
Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34
Waianae Coast Neighborhood Board No. 24
Leeward Oahu Transportation Management Association
Honokai Hale/Nanakai Gardens Community Association
Ko Olina Community Association
West Oahu Economic Development Association
Hawaiian Civic Club
Kapolei Rotary Club
Makakilo-Kapolei Lions Club
Soroptimist International of West Oahu
Hawaiian Railway Society
Friends of the Pearl Harbor Historic Trail
Senator Brian Kanno
Representative Mark Moses
Representative Michael Kahikina
Councilmember Mike Gabbard
Councilmember Donovan M. Dela Cruz
University of Hawaii, Hamilton Library
Legislative Reference Bureau
DBEDT Library
Hawaii State Main Library
Kapolei Regional Library
Waianae Regional Library
Ewa Beach Regional Library
Municipal Reference and Records Center

GENERAL INFORMATION

Petitioner:	Aina Nui Corporation 1001 Kamokila Boulevard, Suite 255 Kapolei, HI 96707 Ms. Donna Goth, President
EA Preparer:	Helber Hastert & Fee, Planners 733 Bishop Street, Suite 2590 Honolulu, HI 96813 (808) 545-2055 Tom Fee / Corlyn Olson Orr
Accepting Authority:	Land Use Commission State of Hawaii
Proposed Action:	Reclassification of approximately 162 acres of land from the Agricultural to the Urban District. This will be consolidated with a 373-acre adjacent parcel urbanized in 1991.
Chapter 343, Hawaii Revised Statutes "Trigger":	Use of State Lands (e.g., roadway crossings of the OR&L railroad right-of-way)
Location:	'Ewa District, O'ahu, Hawai'i
Tax Map Keys:	9-1-14: por. 33 9-1-15: por. 4 and por. 20
Petition Area:	Approximately 162 acres within the State Agricultural District
Landowner:	Aina Nui Corporation
Existing Uses:	Vacant lands, quarrying, stockpiling
Proposed Uses:	Residential, golf course, recreational, park, open space and roadways
Existing State Land Use District:	Agricultural
Proposed State Land Use District:	Urban
Existing City & County of Honolulu Ewa Development Plan:	Low and Medium Density Residential and Industrial
Other Land Use Approvals:	City and County of Honolulu Zone Change
Existing City and County of Honolulu Zoning:	AG-1 Restricted Agricultural and AG-2 General Agricultural
Proposed City and County of Honolulu Zoning:	P-2 General Preservation, A-1 Low Density Apartment, and B-2 Commercial Business

Kapolei West Project Summary

The Kapolei West project area is located approximately 20 miles west of Honolulu, within the 'Ewa District of O'ahu. The entire project area consists of approximately 535 acres and is comprised of Tax Map Keys parcels 9-1-14: por. 33, and 9-1-15: 4, 18 and por. 20. The project area is strategically located between the City of Kapolei and the Ko Olina Resort. As shown on the attached map, surrounding land uses include the H-1 Freeway and the Honokai Hale and Nanakai Gardens subdivisions to the north; the Ko Olina Resort and golf course and vacant lands to the west; Barbers Point (Kalaeloa) Harbor and its industrial activities to the south; and the western boundary of the City of Kapolei and Kalaeloa Boulevard to the east. The historic OR&L railroad right-of-way bisects the southern section of the project area.

The Kapolei West master plan provides a positive transition for the area between the Ko Olina Resort and the City of Kapolei. Proposed development includes an 18-hole championship golf course with low and medium density residential uses, park spaces and private leisure facilities (see attached map). The Kapolei West community is planned to include approximately 2,500 single and multi-family homes. Planned recreational amenities include neighborhood parks, a pedestrian pathway system to link the neighborhoods, and a private recreational facility near the Ko Olina marina. At the eastern end of the project area, regional commercial and transit/mixed-use areas are planned to enhance the City of Kapolei and support both the neighboring communities and the proposed Kapolei West community. The attached plan presents a conceptual layout of the proposed land uses.

Environmental Assessment Scope

The environmental assessment (EA) is being prepared in support of a State Land Use District Boundary Amendment petition to reclassify a portion of the project area from the State Land Use Agricultural District to the Urban District and a subsequent City and County of Honolulu Zone Change Application. The Petition Area consists of approximately 162 acres of the entire 535-acre project area, and is located in the southern portion of the project site, straddling the OR&L railroad right-of-way. Land uses proposed for the Petition Area are summarized below.

Land Use	Acreage (approx.)
Residential	78.5
Golf Course (13th, 14th and por. of 15 th fairway)	48.4
Park	17.1
Private Leisure Facilities	8
Circulation/Other Open Spaces	10.4
TOTAL	162.4 acres

Pursuant to Chapter 343, Hawaii Revised Statutes, an EA is required for the project's proposed use of state lands (i.e., planned roadways cross the OR&L Railroad right-of-way). The EA will be organized to address both potential direct impacts and mitigation measures for the Petition Area and potential indirect and cumulative impacts associated with the larger, 535-acre project area.

The 373 acres of the project area not included in the Petition Area are classified as Urban, in accordance with Docket No. A90-655 approved by the Land Use Commission in 1991 for the Ko Olina Phase II development proposed by West Beach Estates. The Ko Olina Phase II development consisted of an 18-hole golf course, 3,500 low and medium density residential units, retail and commercial development, and park space. The Kapolei West project, which encompasses the 373-acre Ko Olina Phase II project area and the 162-acre Petition Area, is consistent with the land uses formerly proposed for the property (Ko Olina Phase II). An

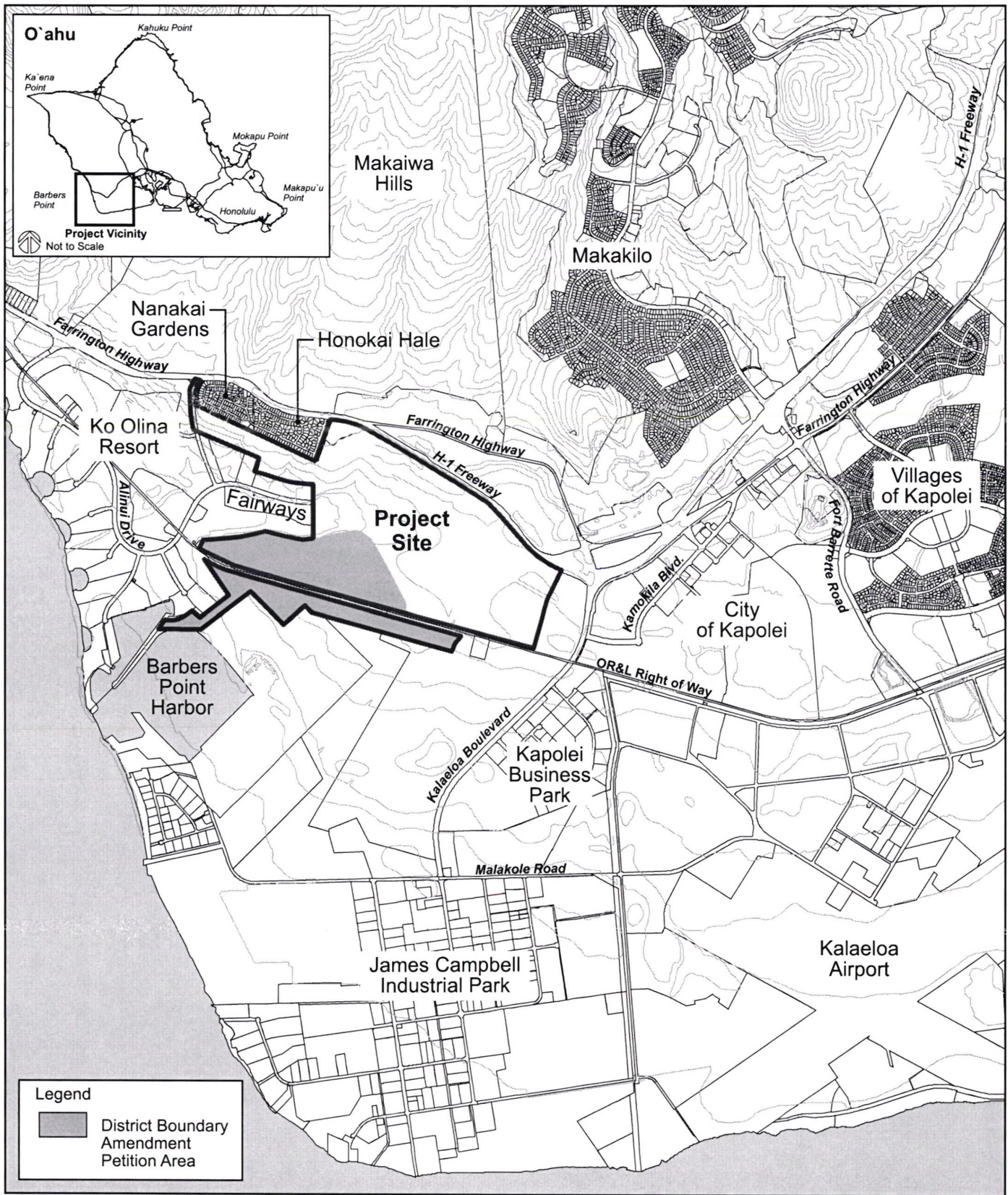
important distinction between the Ko Olina Phase II plan and the Kapolei West plan is the lower intensity of use associated with Kapolei West, as a significant reduction in the number of residential units is proposed (based on current and projected market conditions).

Potential Impacts

Potential impacts associated with urbanization petition include but are not limited to those related to noise, air and water quality, drainage, archaeological, cultural and historic resources, soils, flora and fauna, utilities, visual resources, traffic, and socio-economic impacts. The following is a list of technical studies that will be conducted to analyze potential impacts of the proposed development. The analyses and findings of these studies will be summarized in the Draft EA, with copies included as appendices to the report.

Technical Studies

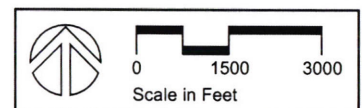
Archaeological Inventory Survey	Noise Assessment
Cultural Impact Assessment	Air Quality Assessment
Botanical Survey	Traffic Impact Study
Civil and Electrical Engineering Report	Water Resources Study
Fiscal and Economic Impact Assessment	Market Study
Agriculture Impact Analysis	

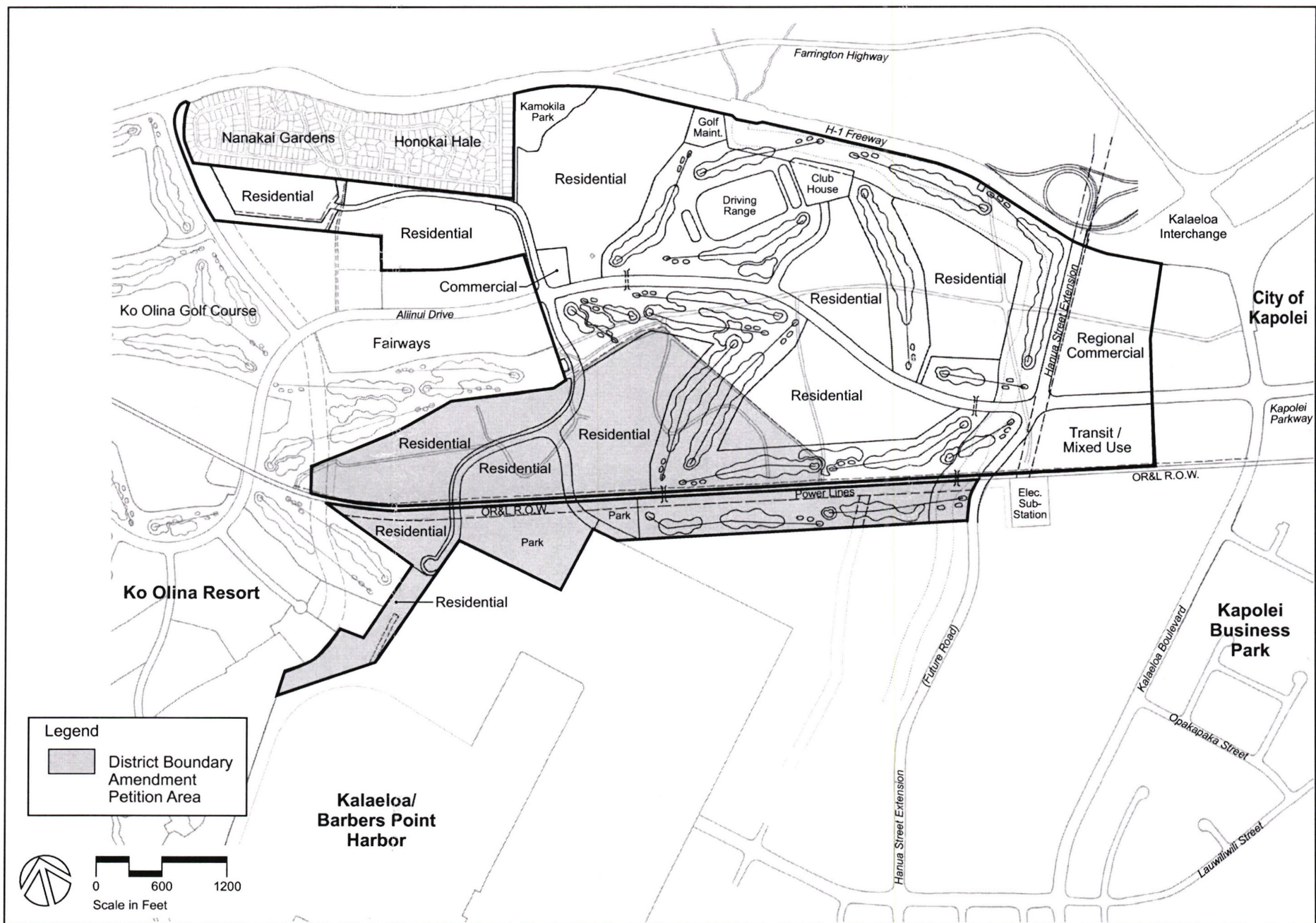


Kapolei West: Project Location

Helber Hastert & Fee, Planners

April 20, 2004





Kapolei West: Proposed Land Use Plan

Helber Hastert & Fee, Planners

April 20, 2004

Helber Hastert & Fee
Planners, Inc.

April 20, 2004

City & County of Honolulu
Department of Planning & Permitting
650 South King Street
Honolulu, HI 96813

LAND USE COMMISSION
STATE OF HAWAII

2004 APR 21 A 10:50

Sandy-pls file
KG-Best
dhc



Dear Sir or Madam,

Kapolei West, 'Ewa, O'ahu, Hawai'i
Draft Environmental Assessment Pre-Assessment Consultation

We have been contracted by Aina Nui Corporation, an affiliate of the Estate of James Campbell, to prepare the master plan and accompanying environmental assessment (EA) for the proposed Kapolei West development. Located between the Ko Olina Resort and the City of Kapolei in 'Ewa, O'ahu, Kapolei West is a master-planned golf/residential community planned on approximately 535 acres of land. The project master plan includes an 18-hole championship golf course with low and medium density residential uses to complement the existing Ko Olina Resort, and commercial uses within the eastern end of the project area to enhance the existing commercial and retail activity of the City of Kapolei.

The environmental assessment is being prepared in support of a State Land Use District Boundary Amendment petition to reclassify a portion of the project area from the State Land Use Agricultural District to the Urban District and a subsequent City and County of Honolulu Zone Change Application. This pre-assessment consultation is intended to ensure that interested parties are notified of the forthcoming Draft EA, and that all relevant environmental, economic and technical issues and concerns are identified and addressed. A brief description of the project and general information regarding the contents of the EA is enclosed for your consideration. Should you have any written comments, we invite you to submit them by May 5, 2004 to the following address:

Helber, Hastert and Fee Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813
ATTN: Kapolei West

Thank you for interest in this project. If you have any questions or concerns, or would like to be removed from our distribution list, please contact Corlyn Olson Orr, project planner, at 545-2055 or via e-mail at colsonorr@hhf.com.

Aloha,

Thomas A. Fee, AICP
Principal

Attachments

cc: Ms. Donna Goth, Aina Nui Corporation
Mr. Anthony Ching, Land Use Commission

Helber Hastert & Fee

Planners, Inc.

Kapolei West Draft Environmental Assessment

Pre-Assessment Consultation

April 20, 2004

Page 2 of 3

Distribution: Department of Agriculture, Soil Conservation Service
Department of the Army, Army Corps of Engineers
Department of the Army, Army Support Command Hawaii
Department of the Navy, Naval Base, Pearl Harbor
US Fish and Wildlife Service
Department of the Interior, US Geological Survey
US Federal Aviation Administration
US Federal Highway Administration
US Coast Guard
Department of Accounting and General Services
Department of Agriculture
Department of Budget and Finance
Public Utilities Commission
Department of Business, Economic Development, and Tourism
Office of Planning
Energy Resources & Technology Office
Department of Defense
Department of Education
Department of Health
Office of Environmental Quality Control
Department of Hawaiian Home Lands
Department of Human Services, Housing & Community Development Corporation
Department of Labor and Industrial Relations
Department of Land and Natural Resources
State Historic Preservation Division
Department of Transportation
Office of Hawaiian Affairs
University of Hawaii, Environmental Center
University of Hawaii, Water Resources Research Center
Oahu Metropolitan Planning Organization
Board of Water Supply
City and County Department of Community Services
City and County Department of Design and Construction
City and County Department of Environmental Services
City and County Department of Facility Maintenance
City and County Department of Parks and Recreation
City and County Department of Planning and Permitting
City and County Department of Transportation Services
Honolulu Fire Department
Honolulu Police Department
Oahu Civil Defense Agency
Verizon Telephone
Hawaiian Electric Company
Gas Company
Sierra Club
Common Cause Hawaii
Hawaii Audubon Society
Hawaii's Thousand Friends

Helber Hastert & Fee

Planners, Inc.

Kapolei West Draft Environmental Assessment

Pre-Assessment Consultation

April 20, 2004

Page 3 of 3

Land Use Research Foundation
League of Women Voters
Outdoor Circle
Life of the Land
Hawaii Building & Construction Trade Council
Hawaii Farm Bureau Foundation
Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34
Waianae Coast Neighborhood Board No. 24
Leeward Oahu Transportation Management Association
Honokai Hale/Nanakai Gardens Community Association
Ko Olina Community Association
West Oahu Economic Development Association
Hawaiian Civic Club
Kapolei Rotary Club
Makakilo-Kapolei Lions Club
Soroptimist International of West Oahu
Hawaiian Railway Society
Friends of the Pearl Harbor Historic Trail
Senator Brian Kanno
Representative Mark Moses
Representative Michael Kahikina
Councilmember Mike Gabbard
Councilmember Donovan M. Dela Cruz
University of Hawaii, Hamilton Library
Legislative Reference Bureau
DBEDT Library
Hawaii State Main Library
Kapolei Regional Library
Waianae Regional Library
Ewa Beach Regional Library
Municipal Reference and Records Center

GENERAL INFORMATION

Petitioner:	Aina Nui Corporation 1001 Kamokila Boulevard, Suite 255 Kapolei, HI 96707 Ms. Donna Goth, President
EA Preparer:	Helber Hastert & Fee, Planners 733 Bishop Street, Suite 2590 Honolulu, HI 96813 (808) 545-2055 Tom Fee / Corlyn Olson Orr
Accepting Authority:	Land Use Commission State of Hawaii
Proposed Action:	Reclassification of approximately 162 acres of land from the Agricultural to the Urban District. This will be consolidated with a 373-acre adjacent parcel urbanized in 1991.
Chapter 343, Hawaii Revised Statutes "Trigger":	Use of State Lands (e.g., roadway crossings of the OR&L railroad right-of-way)
Location:	'Ewa District, O'ahu, Hawai'i
Tax Map Keys:	9-1-14: por. 33 9-1-15: por. 4 and por. 20
Petition Area:	Approximately 162 acres within the State Agricultural District
Landowner:	Aina Nui Corporation
Existing Uses:	Vacant lands, quarrying, stockpiling
Proposed Uses:	Residential, golf course, recreational, park, open space and roadways
Existing State Land Use District:	Agricultural
Proposed State Land Use District:	Urban
Existing City & County of Honolulu Ewa Development Plan:	Low and Medium Density Residential and Industrial
Other Land Use Approvals:	City and County of Honolulu Zone Change
Existing City and County of Honolulu Zoning:	AG-1 Restricted Agricultural and AG-2 General Agricultural
Proposed City and County of Honolulu Zoning:	P-2 General Preservation, A-1 Low Density Apartment, and B-2 Commercial Business

Kapolei West Project Summary

The Kapolei West project area is located approximately 20 miles west of Honolulu, within the 'Ewa District of O'ahu. The entire project area consists of approximately 535 acres and is comprised of Tax Map Keys parcels 9-1-14: por. 33, and 9-1-15: 4, 18 and por. 20. The project area is strategically located between the City of Kapolei and the Ko Olina Resort. As shown on the attached map, surrounding land uses include the H-1 Freeway and the Honokai Hale and Nanakai Gardens subdivisions to the north; the Ko Olina Resort and golf course and vacant lands to the west; Barbers Point (Kalaeloa) Harbor and its industrial activities to the south; and the western boundary of the City of Kapolei and Kalaeloa Boulevard to the east. The historic OR&L railroad right-of way bisects the southern section of the project area.

The Kapolei West master plan provides a positive transition for the area between the Ko Olina Resort and the City of Kapolei. Proposed development includes an 18-hole championship golf course with low and medium density residential uses, park spaces and private leisure facilities (see attached map). The Kapolei West community is planned to include approximately 2,500 single and multi-family homes. Planned recreational amenities include neighborhood parks, a pedestrian pathway system to link the neighborhoods, and a private recreational facility near the Ko Olina marina. At the eastern end of the project area, regional commercial and transit/mixed-use areas are planned to enhance the City of Kapolei and support both the neighboring communities and the proposed Kapolei West community. The attached plan presents a conceptual layout of the proposed land uses.

Environmental Assessment Scope

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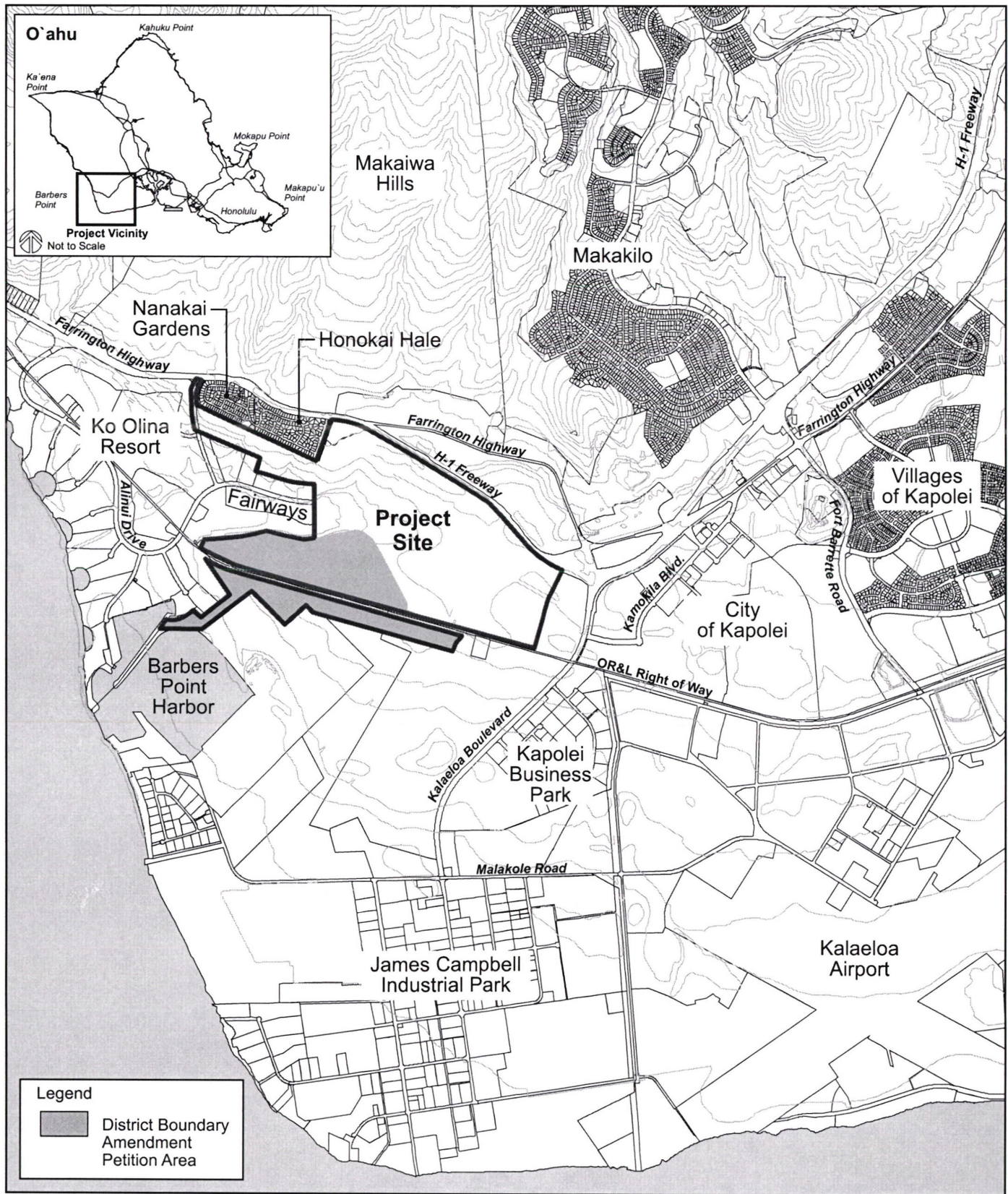
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Technical Studies

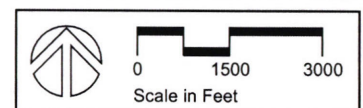
Archaeological Inventory Survey	Noise Assessment
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Civil and Electrical Engineering Report	Water Resources Study
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Agriculture Impact Analysis	

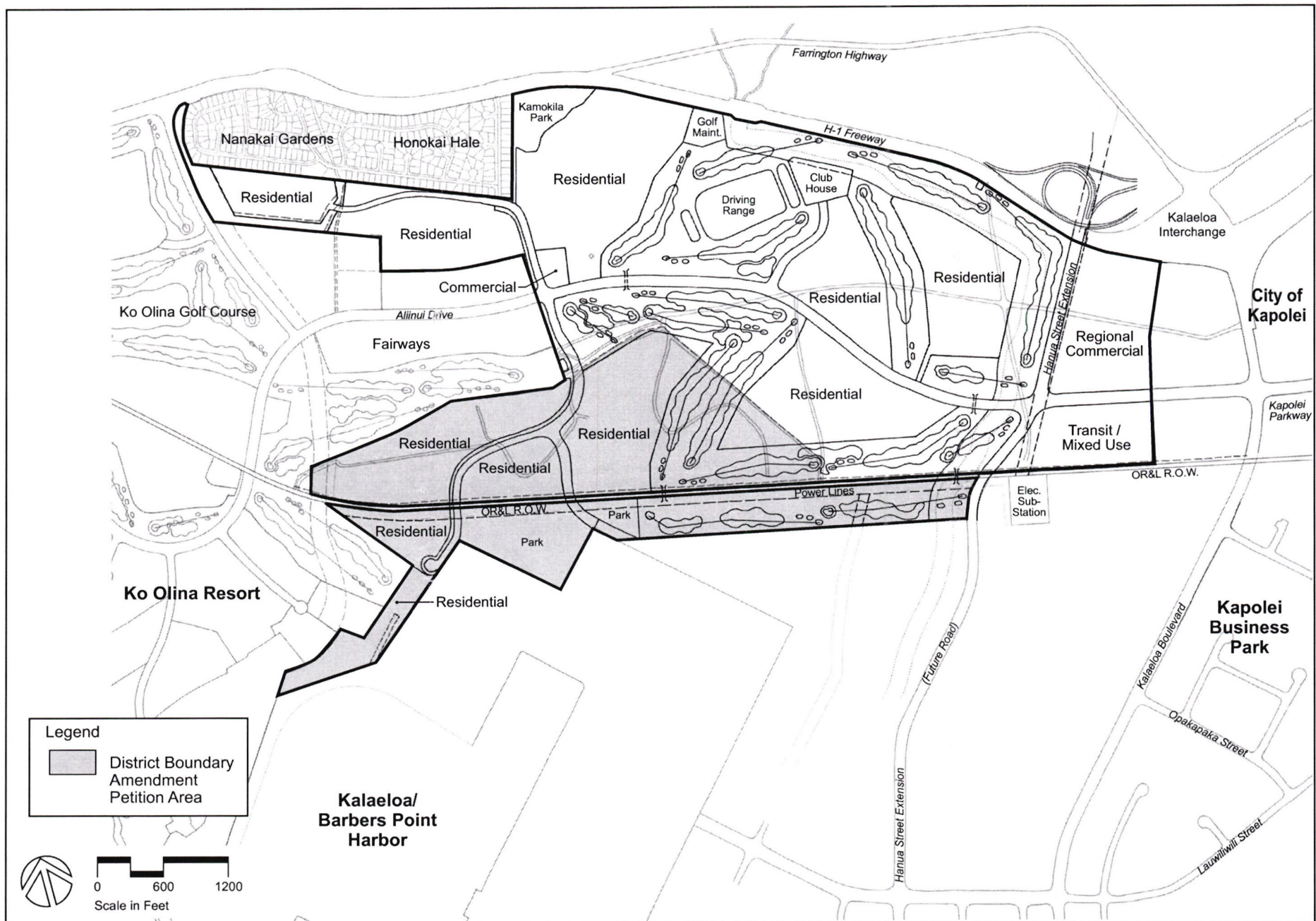


Kapolei West: Project Location

Helber Hastert & Fee, Planners

April 20, 2004





Kapolei West: Proposed Land Use Plan

Helber Hastert & Fee, Planners

April 20, 2004

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU3375 KOAPAKA STREET, SUITE H425 • HONOLULU, HAWAII 96819-1869
TELEPHONE: (808) 831-7761 • FAX: (808) 831-7750 • INTERNET: www.honolulufire.orgJEREMY HARRIS
MAYORATTILIO K. LEONARDI
FIRE CHIEFJOHN CLARK
DEPUTY FIRE CHIEF

May 4, 2004

05/05/2004

Helber Hastert & Fee Planners, Inc.
Pacific Guardian Center, Makai Tower
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Attn: Kapolei West

Dear Sir or Madam:

Subject: Kapolei West Development
Draft Environmental Assessment (DEA) Pre-Assessment Consultation
'Ewa, Oahu, Hawaii

In response to a letter from Thomas A. Fee dated April 20, 2004, requesting our comments on the above-mentioned DEA, the Honolulu Fire Department (HFD) requires that the following be complied with:

1. Provide a private water system where all appurtenances, hydrant spacing, and fire flow requirements meet Board of Water Supply standards.
2. Provide a fire department access road within 150 feet of the first floor of the most remote structure. Such access shall have a minimum vertical clearance of 13 feet 6 inches, be constructed of an all-weather driving surface complying with Department of Transportation Services (DTS) standards, capable of supporting the minimum 60,000-pound weight of our fire apparatus, and with a gradient not to exceed 20%. The unobstructed width of the fire apparatus access road shall meet the requirements of the appropriate county jurisdiction. All dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with an approved turnaround having a radius complying with DTS standards.

Sandy File
In and
docket
folder

The seal of the Honolulu Fire Department is circular. It features a central shield with a sun, a mountain, and a ship. The words "HONOLULU FIRE DEPARTMENT" are written around the top half of the circle, and "2000-2005" is written around the bottom half.

2004 MAY -5 A 9:36

LAND USE COMMISSION
STATE OF HAWAII

Helber Hastert & Fee Planners, Inc.

Page 2

May 4, 2004

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

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

Sincerely,



ATTILIO K. LEONARDI
Fire Chief

05/05/2004 09:07 FAX 8317780

HFD PREVENTION

002/002

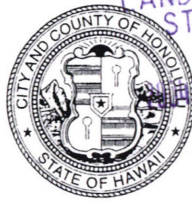
AKL/SK:jl

cc: Ms. Donna Goth, President,
Aina Nui Corporation
Mr. Anthony Ching, Executive Officer,
State of Hawaii, Department of Business, Economic Development & Tourism,
Land Use Commission

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET • HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4414 • FAX: (808) 527-6743 • INTERNET: www.co.honolulu.hi.us

JEREMY HARRIS
MAYOR



LAND USE COMMISSION
STATE OF HAWAII

MAY -6 P 12:59

*Send file
w/ other comments
for this new
document by
Aina Loa*

ERIC G. CRISPIN, AIA
DIRECTOR

BARBARA KIM STANTON
DEPUTY DIRECTOR

KATHY SOKUGAWA
ACTING DEPUTY DIRECTOR

2004/ELOG-850 (MH)

May 5, 2004

Mr. Thomas A. Fee, AICP
Principal
Helber Hastert & Fee, Planners, Inc.
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Fee:

Kapolei West, Ewa, Oahu, Hawaii
Draft Environmental Assessment Pre-Assessment Consultation

In response to your request regarding the pre-assessment consultation for Kapolei West, we have reviewed the proposal and offer the following comments:

1. The Draft Environmental Assessment (DEA) should include a section with discussions on how the proposed project is consistent with the objectives and policies of the City and County of Honolulu's General Plan.
2. The DEA should also include a section, which discusses how the proposed project is consistent with the Ewa Development Plan.
3. The DEA should also include how the proposed project is consistent with the surrounding zoning.
4. The DEA should provide a listing of other land use permits and/or approvals required.
5. With regard to infrastructure (transportation, water, wastewater and drainage), the DEA should include discussions on the adequacy of existing public facilities and services, and the necessity for new public facilities and services, to support the proposed project. These discussions should disclose potential regional impacts/mitigating measures in the context of the Ewa Development Plan area.

Mr. Thomas A. Fee, AICP, Principal
Helber Hastert & Fee, Planners, Inc.

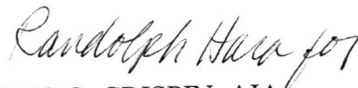
Page 2

May 5, 2004

6. The DEA should further discuss the adequacy/need for parks, schools, police, fire, and emergency medical facilities and services. Again, these discussions should disclose potential regional impacts/mitigating measures in the context of the Ewa Development Plan area.
7. The DEA should discuss the desirability of industrial based traffic through residential areas of the project.
8. The Proposed Action indicates that the project also includes "a 373 acre adjacent parcel urbanized in 1991." It should reflect that the 373 acres are classified as urban.

Should you have any questions, please contact Matt Higashida of our staff at 527-6056.

Sincerely yours,



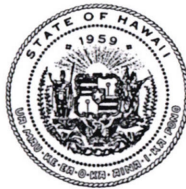
ERIC G. CRISPIN, AIA
Director of Planning and Permitting

EGC:js

cc: Aina Nui Corporation
State Land Use Commission
Office of Environmental Quality Control

P:\Planning\DivFunction\Ea-eis\2004\elog-850.doc

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

Sandy- file as for DBA petition
✓ BOA XC - done
RODNEY K. HARAGA
DIRECTOR

LAND USE COMMISSION
STATE OF HAWAII

Deputy Directors
BRUCE Y. MATSUI
LINDEN H. JOESTING
BRIAN H. SEKIGUCHI

2004 JUN 10 A 10:33

IN REPLY REFER TO:

STP 8.1162

May 20, 2004

Mr. Thomas A. Fee, AICP
Principal
Helber Hastert & Fee Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Fee:

Subject: Kapolei West
Draft Environmental Assessment, Pre-Assessment Consultation
TMK: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

Thank you for your letter of April 20, 2004, advising us of the proposed subject development project and environmental document. We have the following comments:

1. If highway improvements are being proposed, we would like to be apprised of such plans and schedules.
2. To facilitate our review of project and environmental documents, we request that four (4) copies of a full and standard-paged Traffic Impact Analysis Report (TIAR), including complete appendices showing calculation sheets and traffic counts, be provided, along with four (4) copies of any environmental assessment report. The TIAR should include a discussion on the linkages and connections the project's roadways will have with the overall integration of vehicle, transit, pedestrian and bikeway traffic for the area and, as necessary, contingent or interim mitigation measures as the project progresses in phases and/or increments.
3. Proposed plans for any road crossing of the OR & L right-of-way (ROW), easement rights or need for access into any of our highway ROW will need our review and approval, and may be subject to documentation and consideration of payment requirements.
4. Design of the Leeward Bikeway in the OR & L ROW between Ewa and Lualualei may begin within a year and construction may begin in 2007. Because the proposed subject development abuts the OR & L ROW, we request that the developer consider participating in improvements in and/or connecting to the ROW along their common boundary.

Mr. Thomas A. Fee, AICP
Page 2
May 20, 2004

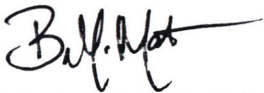
STP 8.1162

5. The proposed subject development will be subject to the impact fees under Chapter 33A, Revised Ordinances, City and County of Honolulu. The timetable of development, construction and occupancy for the project through full build-out should be outlined so that the project's contribution of its fair share for regional highway improvements can be reviewed.

The development will have an impact on the Kapolei-Ko'Olina Area, Ewa Region and adjacent communities connected by the H-1 corridor. As an interested party, we appreciate being informed in advance and for the opportunity to provide our comments.

We look forward to receive further information on the subject development.

Very truly yours,



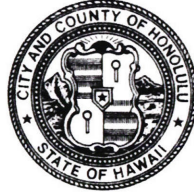
& RODNEY K. HARAGA
Director of Transportation

c: Mr. Anthony Ching, Land Use Commission
Mr. Eric Crispin, Department of Planning & Permitting

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4529 • FAX: (808) 523-4730 • INTERNET: www.co.honolulu.hi.us

Land use Comm.
Sandy-File
EIS comments



JEREMY HARRIS
MAYOR

GEORGE "KEOKI" MIYAMOTO
DIRECTOR

ROBERT J. FISHMAN
DEPUTY DIRECTOR

TP10/04-81562R

November 30, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

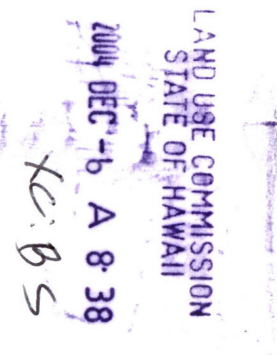
Dear Ms. Goth:

Subject: Kapolei West

In response to the October 23, 2004 letter from Helber Hastert & Fee, Planners, Inc., we have reviewed the Environmental Impact Statement (EIS) Preparation Notice for the subject project. The following comments are the result of this review:

1. The traffic impact assessment should discuss the impact of the development on surrounding City streets. In addition, the study should state whether the project roads will be dedicated to the City.
2. We have some concerns regarding promised transit amenities and the City's ability to provide bus services to low density neighborhoods. We welcome the opportunity to review your plans to develop a transit friendly development.
3. We would like to encourage the applicant to every extent possible, adopt design concepts and recommended standards of the "Ewa Smart Growth Design Code" into their project plans for the area. Although the code has not been adopted at this time, there is a high possibility of it becoming the new requirement.

We look forward to reviewing the draft EIS. To facilitate our review, please provide us with two copies of this document.



Ms. Donna Goth
Page 2
November 30, 2004

Should you have any questions regarding these comments, please contact Faith Miyamoto of the Transportation Planning Division at 527-6976.

Sincerely,

A handwritten signature in dark ink, appearing to read 'George Miyamoto', written over the word 'Sincerely,'.

GEORGE "KEOKI" MIYAMOTO
Director

cc: Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control

✓ Mr. Bert Saruwatari, Planner
Land Use Commission

Ms. Corlyn Olson Orr, Project Planner
Helber Hastert & Fee, Planners

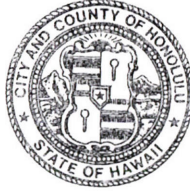
POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111
<http://www.honolulu.gov>
<http://www.honolulupd.org>
www.honolulu.gov

HONOLULU POLICE DEPT.
CHIEF'S OFFICE

04 NOV 22 08 39

JEREMY HARRIS
MAYOR



BOISSE P. CORREA
CHIEF

GLEN R. KAJIYAMA
PAUL D. PUTZULU
DEPUTY CHIEFS

OUR REFERENCE CS-KP

November 15, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice for Kapolei West.

This area will be serviced by officers of District 8, which is headquartered at the Kapolei Police Station located at 1100 Kamokila Boulevard.

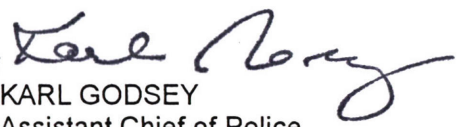
This project will have an impact on the services and facilities of the Honolulu Police Department. Due to the increase in patrol area, population, and traffic, we anticipate more calls for police services to the area. We may have more specific comments when details of the project are developed.

If there are any questions, please call Captain Gregory Lefcourt of District 8 at 692-4253 or Ms. Carol Sodeani of the Support Services Bureau at 529-3658.

Sincerely,

BOISSE P. CORREA
Chief of Police

By


KARL GODSEY
Assistant Chief of Police
Support Services Bureau

cc: Ms. Genevieve Salmonson, OEQC
✓ Mr. Bert Saruwatari, Land Use
Commission, State of Hawaii
Ms. Corlyn Olson Orr, Helbert Haster
& Fee, Planners, Incorporated

Sandy-file
DS comments
LC-Bert
den

XC:BS
NOV 26 A 9:15
LAND USE COMMISSION
STATE OF HAWAII

October 23, 2004

Dear Participant:

Attached for your review is an Environmental Impact Statement Preparation Notice (EISPN) which was prepared pursuant to the EIS law (Hawaii Revised Statutes, Chapter 343) and the EIS rules (Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Kapolei West
LOCATION: Oahu, Ewa District
TAX MAP KEY NOS.: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

**YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY NOVEMBER 22, 2004.
PLEASE SEND ORIGINAL COMMENTS TO THE:**

APPLICANT: Aina Nui Corporation
ADDRESS: 1001 Kamokila Boulevard, Suite 255, Honolulu, HI 96707
CONTACT: Donna Goth, President PHONE: (808) 674-3540

**COPIES OF THE COMMENTS SHOULD BE SENT TO THE OFFICE OF ENVIRONMENTAL
QUALITY CONTROL (235 South Beretania Street, Suite 702, Honolulu, HI 96813) AND
THE FOLLOWING:**

ACCEPTING AUTHORITY: Land Use Commission, State of Hawaii
ADDRESS: 235 South Beretania Street, Room 406, Honolulu, HI 96813
CONTACT: Bert Saruwatari, Planner PHONE: (808) 587-3822

CONSULTANT: Helber Hastert & Fee, Planners, Inc.
ADDRESS: 733 Bishop Street, Suite 2590, Honolulu, HI 96813
CONTACT: Corlyn Olson Orr, Project Planner PHONE: (808) 545-2055

If you have no comments but wish to receive a copy of the Draft EIS and participate in the environmental review process, please contact Corlyn Olson Orr at (808) 545-2055 or via e-mail at colsonorr@hhf.com.

Thank you for your participation in the EIS process. We look forward to receiving your comments, questions and suggestions.

Sincerely,

HELBER, HASTERT AND FEE, PLANNERS.



Thomas A. Fee, AICP
President

Enclosure

LINDA LINGLE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

2004 NOV 17 A 9:54



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

DEPT. OF LAND &
NATURAL RESOURCES

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 9, 2004

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEI WEST EISP.CMT3
LUC A90-655

Suspense Date: 11/16/04

MEMORANDUM:

TO: ✓ XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Kapolei West Project
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the attached document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments.

Date: 11/16/04

Division Engineering

(X) Comments attached.

Signed: Eric T. Hirano

Name: ERIC T. HIRANO, CHIEF ENGINEER

EISP letter
File

04 NOV 10 PM 03:20 ENGINEERING

LINDA LINGLE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

2004 NOV 17 A 9:54



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

PETER T. YOUNG
CHAIRPERSON
COMMISSION ON LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

DEPT. OF LAND &
NATURAL RESOURCES

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 9, 2004

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
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STATE PARKS

LD/NAV
KAPOLEI WESTEISP.CMT3
LUC A90-655

Suspense Date: 11/16/04

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TO: ✓ XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Kapolei West Project
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If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments.

Date: 11/16/04

Division Engineering

(X) Comments attached.

Signed: Eric T. Hirano

Name: ERIC T. HIRANO, CHIEF ENGINEER

04 NOV 10 PM 03:20 ENGINEERING

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LAND USE COMMISSION
STATE OF HAWAII

LA/NAV

2004 DEC -3 P 1: 08

Ref.: KAPOLIEWESTEISO.CMT

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone D. The National Flood Insurance Program does not have any regulations for development within this area.
- () Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone.
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ____.
- () Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- () Mr. Robert Sumimoto at (808) 523-4254 or Mr. Mario Siu Li at (808) 523-4247 of the City and County of Honolulu, Department of Planning and Permitting.
- () Mr. Kelly Gomes at (808) 961-8327 (Hilo) or Mr. Kiran Emler at (808) 327-3530 (Kona) of the County of Hawaii, Department of Public Works.
- () Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
- () Mr. Mario Antonio at (808) 241-6620 of the County of Kauai, Department of Public Works.
- () The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
- () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.
- () Additional Comments: _____
- () Other: _____

Should you have any questions, please call Mr. Andrew Monden of the Planning Branch at 587-0229.

Signed: _____

ERIC T. HIRANO, CHIEF ENGINEER

Date: _____

11/16/04

LINDA LINGLE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

2004 NOV 16 A 10: 26



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1: 08

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 9, 2004

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEI WESTEISP.CMT3
LUC A90-655

Suspense Date: 11/16/04

MEMORANDUM:

TO: XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
✓ XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Kapolei West Project
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the attached document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

(✓) We have no comments.

() Comments attached.

Date: 11/15/04

Signed:

Division

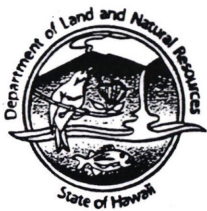
LAND

Name:

Cecil Santos

ky

LINDA LINGLE
GOVERNOR OF HAWAII



RECEIVED

04 NOV 10 A10:46



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 9, 2004

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEI WESTEISP.CMT3
LUC A90-655

Suspense Date: 11/16/04

MEMORANDUM:

TO: XXX Engineering Division
XXX Division of Forestry and Wildlife
✓ XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Kapolei West Project
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the attached document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments.

(X) Comments attached.

Date: 11-15-04

Signed: [Signature]

Division CWRM

Name: LENORE WAKAMA

LINDA LINGLE
GOVERNOR OF HAWAII

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LAND DIVISION

2004 NOV 18 A 9:59



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:00

PETER T. YOUNG
CHAIRPERSON

REDITH J. CHING
CLAYTON W. DELA CRUZ
JAMES A. FRAZIER
CHIYOME L. FUKINO, M.D.
LAWRENCE H. MIIKE, M.D., J.D.
STEPHANIE A. WHALEN

YVONNE Y. IZU
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

November 17, 2004

Ref :Kapolei West EIS prep.dr

TO: Ms. Dede Mamiya, Administrator
Land Division

FROM: Yvonne Y. Izu, Deputy Director
Commission on Water Resource Management (CWRM)

SUBJECT: Environmental Impact Statement Preparation Notice, Kapolei West Project

Thank you for the opportunity to review the subject document. Our comments related to water resources are marked below.

In general, the CWRM strongly promotes the efficient use of our water resources through conservation measures and use of alternative non-potable water resources whenever available, feasible, and there are no harmful effects to the ecosystem. Also, the CWRM encourages the protection of water recharge areas, which are important for the maintenance of streams and the replenishment of aquifers.

- ☒ We recommend coordination with the county government to incorporate this project into the county's Water Use and Development Plan.
- ☐ We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ We are concerned about the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- ☐ A Well Construction Permit and/or a Pump Installation Permit from the Commission would be required before ground water is developed as a source of supply for the project.
- ☐ The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit from the Commission would be required prior to use of this source.
- ☐ Groundwater withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ We are concerned about the potential for degradation of instream uses from development on highly erodible slopes adjacent to streams within or near the project. We recommend that approvals for this project be conditioned upon a review by the corresponding county's Building Department and the developer's acceptance of any resulting requirements related to erosion control.
- ☐ If the proposed project includes construction of a stream diversion, the project may require a stream diversion works permit and amend the instream flow standard for the affected stream(s).
- ☐ If the proposed project alters the bed and banks of a stream channel, the project may require a stream channel alteration permit.
- ☒ OTHER:

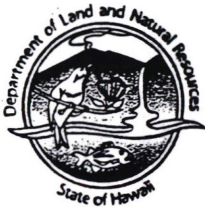
If new ground-water sources are constructed to supply water for the project, well construction, pump installation, and water use permits from the Commission would be required.

Pump 10 (Well Nos. 2006-01 to 12) was identified as a potential source of non-potable water for the irrigation needs of the golf course, parks and open spaces. Pump 10 is currently permitted for diversified agricultural use only. Should Pump 10 be selected to supply non-agricultural irrigation needs, the water use permit must first be modified, as provided in the State Water Code. In the event that Pump 10 is not selected as an irrigation source, the applicant should describe future plans for the well, which may include properly sealing the source to prevent possible contamination of the underlying aquifer.

We would also like to correct the water availability figures cited under the Potable Water section. Currently, the Ewa-Kunia Aquifer System has an estimated sustainable yield of 16 mgd, of which 15.547 mgd has been allocated. Thus, there is only 0.543 mgd that remains available for allocation at this time

If there are any questions, please contact Lenore Y. Nakama at 587-0218.

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 9, 2004

LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
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ENGINEERING
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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEI WESTEISP.CMT3
LUC A90-655

Suspense Date: 11/16/04

MEMORANDUM:

TO: XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Environmental Impact Statement Preparation Notice
Kapolei West Project
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the attached document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments.

() Comments attached.

Date: _____

Signed: _____

Division _____

Name: _____

RECEIVED

'04 NOV 10 A10 :32

FORESTRY & WILDLIFE
STATE OF HAWAII

NOV DEC -3 10 08

NOV DEC -3 10 08
HAWAII STATE

Division of Forestry & Wildlife

1151 Punchbowl Street, Rm. 325 • Honolulu, HI 96813 • (808) 587-0166 • Fax: (808) 587-0160

LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

November 15, 2004

MEMORANDUM

TO: Nick Vaccaro, Land Agent
Land Division

THRU: Dierdre S. Mamiya, Administrator
Land Division

FROM: Paul J. Conry, Administrator
Division of Forestry and Wildlife

Paul J. Conry

SUBJECT: **Environmental Impact Statement Preparation Notice, Kapolei West
Project TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.**

DOFAW has remained consistent in its review of projects in the Kapolei-Kalaeloa-Ewa plains area. We know of three endangered plants: 1) *Achyranthes splendens spp rotundata*, 2) *Chamaesyce skottsbergii* and 3) *Abutilon menziesii* that are present in this area. Please mitigate these plants by doing an on-site survey prior to the construction of this development. Additional information can be obtained by calling Ms. Vickie Caraway, State Botanist at 587-0165 if you have questions regarding the endangered plants in this area. Although botanical surveys show no endangered plants, DOFAW has seen these plants in the wild following a completed survey. We ask that prior to the construction that a on-site inspection for these plants are completed. Thank you for the opportunity to comment on your project proposed at Kapolei, West Oahu.

C: Vickie Caraway, DOFAW

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NOV 16 2004

2004 NOV 16 P 3:23

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LAND DIVISION

LINDA LINGLE
GOVERNOR OF HAWAII

LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1: 08



November 30, 2004
LD-NAV



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Sandy-File
PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

Best P. 11
DAN DAVIDSON
DEPUTY DIRECTOR - LAND

R
YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

A04-7-753AINANUI.RCM2

Honorable Mary Lou Kobayashi, Director
Office of Planning
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Ms. Kobayashi:

Subject: Draft Environmental Impact Statement
State Land Use District Boundary Amendment
Petition: A04-753 and A90-655 (LUC)
Project: Kapolei West Project

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

A copy of the documents pertaining to the subject matter was made available to the following Department of Land and Natural Resources' Divisions for their review and comment:

- Engineering Division
- Commission on Water Resource Management
- Office of Conservation and Coastal Lands
- Land-Oahu District Land Office
- Division of Forestry and Wildlife

Enclosed please find a copy of the Engineering Division, Commission on Water Resource Management and Division of Forestry and Wildlife comments.

Based on the attached responses, the Department of Land and Natural Resources has no other comment to offer on the subject matter. Should you have any questions, please contact Nicholas A. Vaccaro of the Land Division Support Services Branch at (808) 587-0384.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Dierdre S. Mamiya".

DIERDRE S. MAMIYA
Administrator

C: ODLO
LUC
Helber, Hastert & Fee, Planners

LINDA LINGLE
GOVERNOR OF HAWAII



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1: 08



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 15, 2004

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES,
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEIWEST.CMT4
LUC A90-655

Suspense Date: 11/16/04
PETITION A04-753AINANUI

MEMORANDUM:

TO: XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Amendment to the State Land Use District Boundaries
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Note: One copy of the petition is available for review in the Land Division Office Room, 220.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

☒ We have no comments.

☐ Comments attached.

Date: 11/23/04

Signed:

Division LAND Division

Name:

Cecil Santos
Cecil Santos
du

RECEIVED
LAND DIVISION
2004 NOV 23 P 2:28
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 15, 2004

LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
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DAN DAVIDSON
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YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

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CONSERVATION AND COASTAL LANDS
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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEIWEST.CMT4
LUC A90-655

Suspense Date: 11/16/04
PETITION A04-753A INANUI

MEMORANDUM:

TO: **XXX Engineering Division**
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XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

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Land Division

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If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments.

(X) Comments attached.

Date: 11/18/04

Signed: Eric T. Hirano

Division Engineering

Name: ERIC T. HIRANO, CHIEF ENGINEER

RECEIVED
LAND DIVISION
2004 NOV 15 PM 03:53 ENGINEERING

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LAND USE COMMISSION
STATE OF HAWAII

LD/NAV

Ref.: REZ 04-029.CMT

2004 DEC -3 P 1: 08

COMMENTS

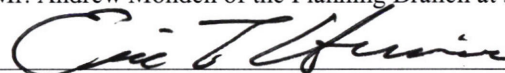
- () We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone.
- (X) **Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone X. The Flood Insurance Program does not have any regulations for development within Zone X.**
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is ____.
- () Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- () Mr. Robert Sumimoto at (808) 523-4254 or Mr. Mario Siu Li at (808) 523-4247 of the City and County of Honolulu, Department of Planning and Permitting.
- () Mr. Kelly Gomes at (808) 961-8327 (Hilo) or Mr. Kiran Emler at (808) 327-3530 (Kona) of the County of Hawaii, Department of Public Works.
- () Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
- () Mr. Mario Antonio at (808) 241-6620 of the County of Kauai, Department of Public Works.
- () The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
- () The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.
- (X) **Additional Comments: We do not anticipate any effects to the Engineering program due to the proposed boundary change of the subject area.**
- () Other: _____

Should you have any questions, please call Mr. Andrew Monden of the Planning Branch at 587-0229.

Signed:

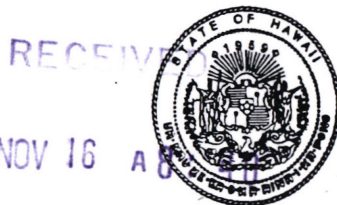


ERIC T. HIRANO, CHIEF ENGINEER

Date:

11/18/04

LINDA LINGLE
GOVERNOR OF HAWAII



04 NOV 16 A 8

COMMISSION ON WATER RESOURCE MANAGEMENT
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 15, 2004

LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:08

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEIWEST.CMT4
LUC A90-655

Suspense Date: 11/16/04
PETITION A04-753AINANUI

MEMORANDUM:

TO: XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Amendment to the State Land Use District Boundaries
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Note: One copy of the petition is available for review in the Land Division Office Room, 220.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

() We have no comments.

(✓) Comments attached.

Date: _____

Signed: W. Pay Hardy

Division _____

Name: W. Pay Hardy



RECEIVED
LAND DIVISION

2004 NOV 18 P 3:50

LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1:00

PETER T. YOUNG
CHAIRPERSON

MEREDITH J. CHING
CLAYTON W. DELA CRUZ
JAMES A. FRAZIER
CHIYOME L. FUKINO, M.D.
LAWRENCE H. MIIKE, M.D., J.D.
STEPHANIE A. WHALEN

YVONNE Y. IZU
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

November 18, 2004

Ref Ainanui Peition AO4-753AINANUI .dr.doc

TO: Ms. Dede Mamiya, Administrator
Land Division

FROM: Yvonne Y. Izu, Deputy Director *Y*
Commission on Water Resource Management (CWRM)

SUBJECT: Amendment to the State Land Use Boundaries, TMK 9-1-14:por.33, 9-1-15:por. 04 & 20

Thank you for the opportunity to review the subject document. Our comments related to water resources are marked below.

In general, the CWRM strongly promotes the efficient use of our water resources through conservation measures and use of alternative non-potable water resources whenever available, feasible, and there are no harmful effects to the ecosystem. Also, the CWRM encourages the protection of water recharge areas, which are important for the maintenance of streams and the replenishment of aquifers.

- ☒ [X] We recommend coordination with the county government to incorporate this project into the county's Water Use and Development Plan.
- ☐ [] We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ [] We are concerned about the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- ☐ [] A Well Construction Permit and/or a Pump Installation Permit from the Commission would be required before ground water is developed as a source of supply for the project.
- ☐ [] The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit from the Commission would be required prior to use of this source.
- ☐ [] Groundwater withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ [] We are concerned about the potential for degradation of instream uses from development on highly erodible slopes adjacent to streams within or near the project. We recommend that approvals for this project be conditioned upon a review by the corresponding county's Building Department and the developer's acceptance of any resulting requirements related to erosion control.
- ☐ [] If the proposed project includes construction of a stream diversion, the project may require a stream diversion works permit and amend the instream flow standard for the affected stream(s).
- ☐ [] If the proposed project alters the bed and banks of a stream channel, the project may require a stream channel alteration permit.
- ☒ [X] OTHER:

If new non-potable ground-water sources are constructed to supply water for the project, well construction, pump installation, and water use permits from the Commission would be required.

The use of non-potable alternative of wastewater reuse from the Honolulu Wastewater treatment plant is highly encouraged and an analysis of such alternative use would be required should water use permits from the caprock be required or modified to supply developments on these parcels.

If there are any questions, please contact Roy Hardy at 587-0274.

LINDA LINGLE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

2004 NOV 26 A 10: 56



LAND USE COMMISSION
STATE OF HAWAII

2004 DEC -3 P 1: 08

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 15, 2004

PETER T. YOUNG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DAN DAVIDSON
DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

LD/NAV
KAPOLEIWEST.CMT4
LUC A90-655

Suspense Date: 11/16/04
PETITION A04-753AINANUI

MEMORANDUM:

TO: XXX Engineering Division
XXX Division of Forestry and Wildlife
XXX Commission on Water Resource Management
XXX Conservation and Coastal Lands
XXX Land-Oahu District Land Office

FROM: Dierdre S. Mamiya, Administrator
Land Division

SUBJECT: Amendment to the State Land Use District Boundaries
TMK: 9-1-14: por. 33 and 9-1-15: por. 04 and por. 20.

Please review the document pertaining to the subject matter and submit your comment (if any) on Division letterhead signed and dated by the suspense date.

Note: One copy of the petition is available for review in the Land Division Office Room, 220.

Should you need more time to review the subject matter, please contact Nick Vaccaro at 587--0384.

If this office does not receive your comments by the suspense date, we will assume there are no comments.

☒ We have no comments.

☐ Comments attached.

Date: NOV 22 2004

Signed: Paul J Conry

Division _____

Name: PAUL J. CONRY, ADMINISTRATOR
DIVISION OF FORESTRY AND WILDLIFE

RECEIVED

04 NOV 16 P3:32

FORESTRY & WILDLIFE
STATE OF HAWAII

801 DEC -3 P 1:08

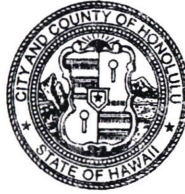
NOI22M103 320 DRAJ
STATE OF HAWAII
LYND USE COMMISSION

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU

715 SOUTH KING STREET, SUITE 311 • HONOLULU, HAWAII 96813
TELEPHONE: (808) 527-5311 • FAX: (808) 527-5498 • INTERNET: www.co.honolulu.hi.us

*Sandy file
EIS
Comments*

LAND USE COMMISSION
STATE OF HAWAII



JEREMY HARRIS
MAYOR

2004 NOV 15 A 8:25
xc: BS
MICHAEL T. AMII
DIRECTOR

JOHN R. SABAS
DEPUTY DIRECTOR

November 5, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Environmental Impact Statement Preparation Notice
Kapolei West

We appreciate the opportunity to review and comment on the subject Environmental Impact Statement (EIS) Preparation Notice. Based on our review, we have initially determined that the proposed project should have no impact on any projects or programs of the Department of Community Services.

The draft EIS should provide more detailed information on the types of housing that will be developed in the proposed project in terms of unit sizes, types, and prices. Given the severe shortage of affordable rental housing our community currently faces, it is our preference that the unit mix include an affordable rental housing component that could be developed by a nonprofit developer or nonprofit/for profit partnership using existing affordable housing programs such as the low income housing tax credit program. We would also ask that consideration be given to set aside of a few house lots for the development of group homes for persons with special needs. As a matter of policy, the City and County of Honolulu promotes the dispersal of housing for persons with special needs throughout the community, including new housing developments.

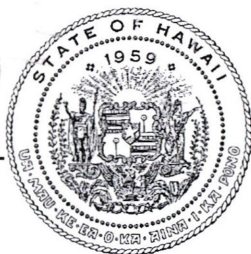
We appreciate your consideration of these comments, and we look forward to reviewing the draft EIS when it becomes available. Questions regarding this matter may be directed to Mr. Keith Ishida at 527-5092.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael T. Amii", with a stylized flourish at the end.

MICHAEL T. AMII
Director

cc: Land Use Commission
Helber Hastert and Fee, Planners



DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

STRATEGIC INDUSTRIES DIVISION

235 South Beretania Street, Leiopapa A Kamehameha Bldg., 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, HI 96804-2359

Telephone: (808) 587-3807
Fax: (808) 587-3820
Web site: www.hawaii.gov/dbedt/ert

*Study file EIS
Aina Nui comments*
LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
STEVE BRETSCHNEIDER
DEPUTY DIRECTOR

November 8, 2004

Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Honolulu, Hawaii 96707

Subject: Kapolei West
Environmental Impact Statement Preparation Notice (EISPN)
Tax Map Key: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

LAND USE COMMISSION
STATE OF HAWAII
2004 NOV 10 A 8:24

Dear Ms. Goth:

In response to your October 23, 2004, notice, thank you for the opportunity to provide comments on the Environmental Impact Statement Preparation Notice (EISPN) for Kapolei West. We note that the proposed action is reclassification of approximately 174 acres of land from the Agricultural to the Urban District to be consolidated with a 373-acre adjacent Urban parcel. The project would result in a 546.8-acre project including residential, golf course, and commercial uses. We would like to call your attention to: (1) State energy conservation goals, (2) energy saving design practices and technologies, and (3) recycling and recycled-content products.

1. **State energy conservation goals.** Project buildings, activities, and site grounds should be designed with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call to your attention HRS 226 18(c)(4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies.

We recommend that you consider City & County of Honolulu Energy Code requirements early on in your project. Hawaiian Electric Co., Inc., (HECO) may also have demand-side management programs that offer rebates and/or incentives for installation of energy efficient technologies.

2. **Energy saving design practices and technologies.** We recommend that energy efficient design practices and technologies be specifically addressed. Energy

COPY

efficiency is improved with effective building location, orientation and massing, and the placement of vegetation for shade or wind protection. Some of the methods and technologies that could be considered, as appropriate, include:

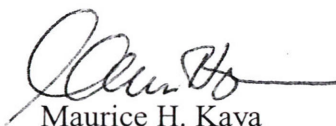
- Establish the building on an east-west axis;
- Minimize east- and west-facing glass;
- Use natural ventilation to increase comfort of occupants;
- Maximize use of natural lighting without heat gain;
- Use high efficiency compact fluorescent lighting;
- Use insulation/radiant barrier for an equivalent R-19 value in ceiling; use ceiling fans;
- Use solar water heating; and
- Use landscaping for dust control and to minimize heat gain to area.

3. **Recycling and recycled-content products.**

- Develop a job-site recycling plan for construction and recycle as much construction and demolition waste as possible;
- Incorporate provisions for recycling into the project – a collection system and space for bins for recyclables; and
- Specify and use products with recycled content such as: steel, concrete aggregate fill, drywall, carpet and glass tile.

If you need clarification of any of the above, please do not hesitate to contact me.

Sincerely,



Maurice H. Kaya
Chief Technology Officer

c: OEQC
Land Use Commission
Helber, Hastert and Fee, Planners



Helber Hastert & Fee, Planners

LAND USE COMMISSION
STATE OF HAWAII

*Sandy - file
EIS Comments
Transmittal
Bert - Pen*

To: Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804

NOV 29 A 9:14

XCBS

Attention: Bert Saruwatari

Date: 24 November 2004

Job Name: Kapolei West

Job No. 2003108

Copies	Date	Description
		Kapolei West EISP Comments
1	11/22/04	Brian Kanno, State Senator, 19th District
1	11/22/04	State of Hawaii Office of Environmental Quality Control
1	11/22/04	The Outdoor Circle
1	11/15/04	U.S. Dept of Transportation Federal Aviation Administration
1	11/16/04	Board of Water Supply
1	11/17/04	City & County of Honolulu Dept of Planning & Permitting
1	11/15/04	City & County of Honolulu Police Dept.
1	11/10/04	City & County of Honolulu Fire Dept.
1	11/8/04	State of Hawaii Dept of Business, Economic Development & Tourism
1	10/27/04	City & County of Honolulu Dept of Parks and Recreation
1	11/5/04	City & County of Honolulu Dept of Community Services

We transmit:

- ☒ Attached
☐ Under separate cover

Via:

- ☒ Mail
☐ Messenger
☐ Courier Service
☐ Blueprint Company
☐ Pick-Up
☐ Hand Delivery

Remarks:

The following:

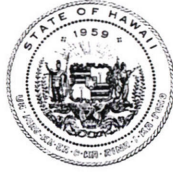
- ☒ Documents
☐ Correspondence
☐ Plans
☐ Sketches/Renderings
☐ Photos
☐ Maps
☐ Brochures
☐

Copies to:

Transmitted as noted:

- ☒ As requested
☐ For review and comment
☐ For your use/information
☐ For your records
☐ For distribution
☐ To be returned
☐ Returned as requested
☐

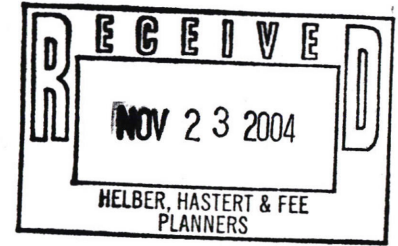
By: Corlyn Olson Orr



The Senate
State of Hawaii

STATE CAPITOL
HONOLULU, HAWAII 96813

November 22, 2004



Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Blvd., Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Upon review of the Environmental Impact Statement Preparation Notice for Kapolei West, prepared for your company by Herber Hastert & Fee, Planners, I would like to offer the following comments which express my great anticipation as well as concerns regarding the Kapolei West project. As you are aware, the development of this area will be highly beneficial to the people of Kapolei, provided, however, that the proper infrastructure is in place. The continued expansion of this area will result in increased population, which will in turn require the construction of adequate roadways to accommodate additional traffic, as well as sufficient educational facilities.

Several different projects, undertaken by varying entities, are currently being contemplated for the Kapolei area. As a result, the residents of the various communities within Kapolei are greatly concerned that serious traffic issues will result should these projects, including the Kapolei West project, be constructed prior to the completion of the proper roadway infrastructure. Proper timing of the construction of adequate infrastructure is crucial in order to ensure that current traffic problems are not further exacerbated. Pursuant to section 2.2 of the Preparation Notice, it is indicated that no roadways with direct connections between Kapolei West and the adjacent communities of Honokai Hale and Nanakai Gardens will be included due to strong community sentiment against the addition of traffic in those areas. The continued attention to these types of concerns raised by the residents of Honokai Hale, Nanakai Gardens and Kapolei is appreciated and should be encouraged throughout this arduous process.

The Preparation Notice also indicates that the project is substantially consistent with the Hawaii State Plan and the City and County of Honolulu General Plan in regard to meeting the objectives of encouraging transportation systems that accommodate the current and future development needs of a community and helping Oahu continue to be a desirable place to live. Although this is the assessment, I believe that the status of this project must continue to be closely monitored in order to ensure that the proper infrastructure exists prior to its further undertaking and completion. Currently, traffic is particularly congested in the area fronting the Kapolei Shopping Center. As the developers, you should endeavor to do whatever possible to mitigate the negative impact on traffic that the project may pose.

Additionally, as previously indicated, the need for additional educational facilities for the children of Kapolei is of the utmost importance. The increased population will amplify the already critical problem of overcrowded classrooms. Timing of the construction of new developments in this area must also be carefully designed and planned so as to ensure that the residents of Kapolei are provided with safe and adequate roads and facilities to meet the growing needs of the area.

Thank you for the opportunity to submit comments on the Preparation Notice. I look forward to receiving further information, particularly that prepared as a result of the Traffic Impact Assessment, and to working together so as to better understand how this project may be successfully completed.

Mālama pono,



Brian Kanno
State Senator, 19th District

cc: Office of Environmental Quality Control
Bert Saruwatari, Land Use Commission, State of Hawaii
Corlyn Olson Orr, Helber Hastert & Fee, Planners, Inc.

LINDA LINGLE
GOVERNOR OF HAWAII



GENEVIEVE SALMONSON
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

November 22, 2004

Ms. Donna Goth
'Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawai'i 96793

Mr. Anthony Ching.
State of Hawai'i - Department of Business Economic Development and Tourism
Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawai'i 96813

Ms. Carolyn Olson Orr
Helber Hastert and Fee Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813

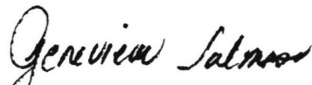
Dear Mesdames Goth and Orr, and Mr. Ching:

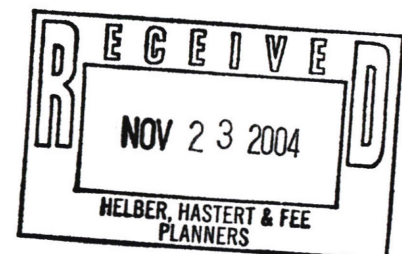
The Office of Environmental Quality Control has reviewed your environmental assessment for the Kapolei West Project, Tax Map Key 9-1-14 por. 33; 9-1-15 por. 4 and por. 20, situated in the judicial district of 'Ewa and offers the following comment for your consideration and response.

1. **Sustainable Building Guidelines:** In construction of the proposed housing, please refer to the "Sustainable Building Guidelines" contained in the Office of Environmental Quality Control's "A Guidebook to the Hawaii State Environmental Review Process" found online at <http://www.state.hi.us/health/oeqc/index.html>.
2. **Cultural Impacts:** While the environmental assessment discusses the archaeological and historical aspects of the project required under Chapter 6E, Hawai'i Revised Statutes, it does not discuss contemporary cultural resources and practices, if any. Please refer to the guidance for cultural impact assessment found on our Internet site above.

Thank you for the opportunity to comment. If there are any questions, please call Mr. Leslie Segundo, Environmental Health Specialist, at (808) 586-4185.

Sincerely,


GENEVIEVE SALMONSON
Director





THE OUTDOOR CIRCLE

1314 South King St., Suite 306 • Honolulu, HI 96814
Phone: 808-593-0300 Fax: 808-593-0525

November 22, 2004

Established 1912
A Non-profit Organization

BRANCHES

O'AHU

Kane'ohe
Lani-Kailua
North Shore
Wai'alaie Kahala
Wai Momi

HAWAII

Ka'u
Kona
Waikoloa Village
Waimea

KAUAI

MAUI

GARDEN CIRCLE

Lani-Kailua

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite #255
Honolulu, HI 96707

Re: Kapolei West
Environmental Impact Statement Preparation Notice

Dear Ms Goth:

On behalf of The Outdoor Circle I would like to thank you for including our organization as a consulted party in the above referenced Environmental Impact Statement Preparation Notice (EISPN). Our comments and questions are listed below:

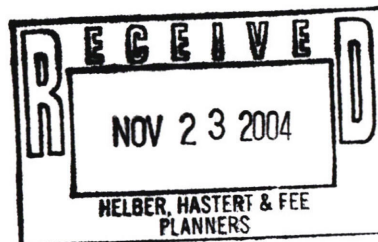
- The EISPN states that there is no significant flora within the project area with the exception of a kiawe forest. Please describe the number of trees within this kiawe forest and whether they will be removed, relocated or remain in place.
- Please itemize how many other significant trees are located in the project area, how many will be removed, how many will remain, and how many will be relocated;
- Please provide a map with specific locations of all trees in the project area;
- A qualified certified arborist must be obtained to perform a tree assessment based on the International Society of Arboriculture's guidelines to determine which trees are healthy and structurally sound and should be preserved;
- Please illustrate the overall landscaping plan for the area;
- The Outdoor Circle believes that no canopy cover should be lost due to construction. Please describe the tree replacement plan you will develop to restore the shade that is lost by removals, and
- Please describe the steps that will be taken to protect trees that will remain on site during construction, i.e. a tree preservation and protection plan developed by a certified arborist.

Thank you for the opportunity to comment. We look forward to reviewing the Draft Environmental Impact Statement.

Sincerely,

Kimberly Hillebrand
Certified Arborist
Landscape and Planting Project Manager

Cc: Helber Hastert and Fee, Planners, Inc.
Office of Environmental Quality Control
Land Use Commission, State of Hawaii

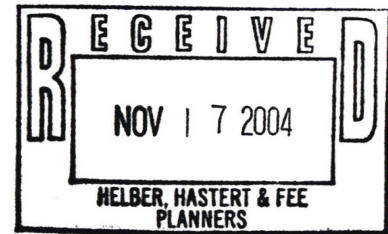




U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Real Estate and Utilities Section, AHNL-54B

P. O. Box 50109
Honolulu, Hawaii 96850-5000



November 15, 2004

Ms. Corlyn Olson Orr
Project Planner
Helber, Hastert, and Fee,
Planners, Inc.
733 Bishop Street, Suite 2590
Honolulu, HI 96813

Dear Ms. Olson Orr:

As discussed earlier, the Federal Aviation Administration has no comments or concerns regarding your Environmental Impact Statement Preparation Notice for your Kapolei West project. We do not need to participate further in this environmental review process.

We appreciate this opportunity to comment. Please contact me at 541-1236, if there are further questions.

Sincerely,

Darice B. N. Young
Realty Contracting Officer

BOARD OF WATER SUPPLY

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



November 16, 2004

JEREMY HARRIS, Mayor

EDDIE FLORES, JR., Chairman
CHARLES A. STED, Vice-Chairman
HERBERT S. K. KAOPUA, SR.
DAROLYN H. LENDIO

RODNEY K. HARAGA, Ex-Officio
LARRY J. LEOPARDI, Ex-Officio

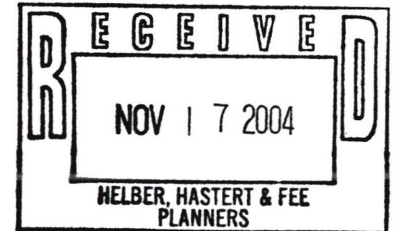
CLIFFORD S. JAMILE
Manager and Chief Engineer

DONNA FAY K. KIYOSAKI
Deputy Manager and Chief Engineer

Mr. Thomas A. Fee, AICP
Helber Hastert & Fee Planners, Inc.
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Fee:

Subject: Your letter of October 23, 2004 on the Environmental
Impact Statement Preparation Notice for Kapolei West,
TMK: 9-1-14: 33, 9-1-15: 4, 20



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

The developer will be required to install the necessary water system improvements to serve the proposed Development.

The construction drawings should be submitted for approval.

The availability of water will be confirmed when the building permits are submitted for approval. When water is made available, the applicant will be required to pay our Water System Facilities Charge for source.

If you have any questions, please contact Joseph Kaakua at 748-5442.

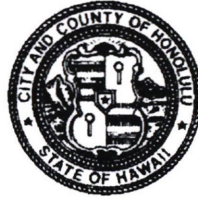
Sincerely,

KEITH S. SHIDA
Principal Executive
Customer Care Division

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 523-4414 • FAX: (808) 527-6743
DEPT. WEB SITE: www.honoluluodpp.org • CITY WEB SITE: www.honolulu.gov

JEREMY HARRIS
MAYOR



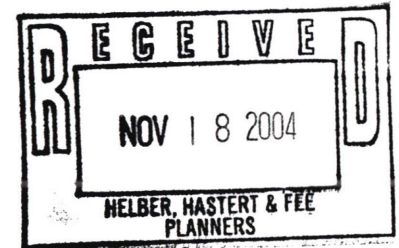
ERIC G. CRISPIN, AIA
DIRECTOR

BARBARA KIM STANTON
DEPUTY DIRECTOR

2004/ELOG-2406 (RYS)

November 17, 2004

Mr. Thomas A. Fee, AICP
President
Helber Hastert & Fee, Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813



Attn: Corlyn Olson Orr, Project Planner

Dear Mr Fee:

Kapolei West, Ewa, Oahu, Hawaii
Environmental Impact Statement Preparation Notice (EISPN)

This is in response to your request dated October 23, 2004, for comments on the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Kapolei West Project, which you are preparing for Aina Nui Corporation. We have reviewed the proposal and offer the following comments for your review and consideration for inclusion in the Draft Environmental Impact Statement (DEIS):

1. EWA "DPLUM" on pages ii, 34, 36, and figure 8: should be revised to EWA DPULUM to refer to the Ewa Development Plan Urban Land Use Map.
2. Section 2.3 Utility Requirements: In addition to the discussion of the utility requirements in Section 2.3, the DEA should include discussions on the adequacy of existing public facilities and services, and the necessity for new public facilities and services, to support the proposed project. These discussions should include the potential transportation regional impacts, including the feasibility of industrial based traffic through residential areas of the project, and mitigating measures in the context of the Ewa Development Plan area.
 - a. Add a discussion of the Kapolei Interceptor Sewer master plan. We suggest calling Scott Gushi of our Wastewater Branch at 523-4886 to discuss the completion date and capacity requirements of the proposed sewer master plan. A sewage capacity reservation is contingent on submittal and approval of a Site

Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.
Page 2
November 17, 2004

Development Division Master Application (Sewer Connection). This project will be liable for payment of the Wastewater System Facility Charge.

- b. A drainage master plan will be required for the development of the area.
- 3. Discuss how the proposed project is consistent with the objectives and policies of the City and County of Honolulu's General Plan listed on pages 31 to 33 of the EISPN.

Please make the following changes to Section 3.12.4 City and County of Honolulu General Plan discussed on pages 30 through 33:

- a. The 1992 GP was last amended on October 3, 2002 to reflect the changes in Population Distribution percentages in Resolution 02-205, CD1, instead of in 2003 as cited.
 - b. II. Economic Activity – Objective G: Policy 3 vice 2 as cited.
 - c. IV. Housing – Objective C: Policy 3 vice 4 as cited.
 - d. V. Transportation and Utilities – Objective A: Policy 1: “c” and “d” vice “b” and “c” as cited.
 - e. X. Culture and Recreation – Policy 9 and 10 cited are for Objective D (To provide a wide range of recreational facilities and services that are readily available to all residents of Oahu) vice for Objective B.
- 4. Expand Section 2.6 on page 13 to include a discussion of the proposed rezoning for “Zone Change 2”, and how the proposed project will be consistent with the surrounding zoning. Addition of a new zone change map to illustrate the proposed zone changes would be helpful.
 - 5. Discuss how the proposed project supports or is consistent with the Ewa Development Plan, including but not limited to the following:
 - a. How the proposed golf course is consistent with the Ewa DP open space guidelines for golf courses (Section 3.1.4.6 on page 3-8 of the Ewa DP).
 - b. The section on parks should be expanded:
 - (1) Include a discussion of how the acreage of the proposed parks compare with the recommended minimum of two acres of park per 1,000 residents (see page 3-16 of the Ewa DP).

Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.
Page 3
November 17, 2004

- (2) Include how the proposed parks are consistent with the Ewa DP guidelines on the development of community-based parks (Section 3.3.2.1, page 3-17). Please specifically address the following:
 - The proposed location of the elementary school and the three planned parks do not support the guideline regarding co-locating parks with schools (see also Section 4.7.2, page 4-32 of the Ewa DP); and
 - The location of the three planned parks do not support the guideline regarding siting parks at the center of neighborhoods to maximize accessibility. The largest planned park, the 14.3-acre historic park, and the planned 2.8-acre passive park, are located at the edge of the proposed projects adjacent to the golf course. Accessibility to these parks may also be compromised by the OR&L right-of-way.
- c. How the proposed project will support the policies and principles regarding views in Section 3.4 of the Ewa DP (beginning on page 3-19).
- d. How the proposed project supports the guidelines in the Ewa DP related to the OR&L Historic Railway (Section 3.4.3.1, page 3-23).
- e. The EISPN states that no roadway connections would be made between the proposed project and the adjacent communities of Honokai Hale and Nanakai Gardens. This does not support the Ewa DP planning principles or design guidelines on developing a comprehensive roadway network (page 4-15). The *Smart Growth* principles of connectivity between communities should be promoted rather than hindered. The EIS should provide a compelling reason for the absence of the roadway connections.
- f. The following editorial changes are suggested:
 - (1) The planned 1.8-acre passive park to the south of the Honokai Hale subdivision (on page 10 of the EISPN) is not shown on Figure 3.
 - (2) Include the DPR park classification (neighborhood, community, or district park) for each of the three parks proposed and for the existing Kamokila Park.

Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.
Page 4
November 17, 2004

- (3) Some of the land use designation labels on Figure 8 are incorrect (the L/MDR and HDR). The leader from the PK/GC label on the upper left of the map also points to the wrong area. Perhaps the PK/GC label should be changed to L/MDR.
 - (4) The sentence on page 34, second paragraph that begins with "The Phasing Map identifies ..." is confusing. The Kapolei Low Density Apartments (LDA) project identified in the sentence is not shown on the Ewa DP Phasing Map. We suggest revising this sentence and the remaining portion of the paragraph in the EIS.
- 6. Page 36 of the EISPN mentions that a portion of the project area lies within the SMA. The applicant should include a map showing the project area and the SMA boundary line, and indicate the square footage of the project area within the SMA.
 - 7. Anticipated Impacts (page 38): The potential impacts of adjacent industrial uses on the proposed residential and park uses, and possible mitigation measures should be discussed.
 - 8. In the discussion of the archeological assessments, include the standard warranty that "Should archeologically significant features be uncovered, construction will be halted and immediate archeological consultation will be sought with the Department of Land and Natural Resources State Historic Preservation Division in accordance with applicable regulations."
 - 9. Add the Ewa Neighborhood Board No. 23 to the list of "Other Agencies, Organizations and Individuals" to be consulted during the preparation of the DEIS to Section 7.0 on page 43.

We will reserve further comments for later after we review the completed DEIS. Should you have any questions, please contact Ray Sakai of our staff at 523-4047.

Sincerely yours,


ERIC G. CRISPIN, AIA
Director of Planning and Permitting

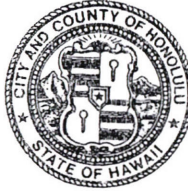
EGC:js

cc: Aina Nui Corporation
State Land Use Commission
Office of Environmental Quality Control
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POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111
<http://www.honolulu.gov>
<http://www.honolulupd.org>
www.honolulu.gov

JEREMY HARRIS
MAYOR

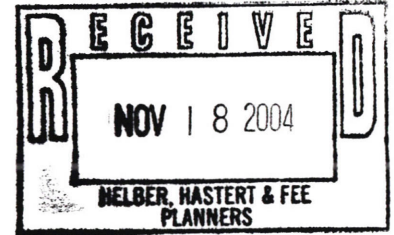


BOISSE P. CORREA
CHIEF

GLEN R. KAJIYAMA
PAUL D. PUTZULU
DEPUTY CHIEFS

OUR REFERENCE CS-KP

November 15, 2004



Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice for Kapolei West.

This area will be serviced by officers of District 8, which is headquartered at the Kapolei Police Station located at 1100 Kamokila Boulevard.

This project will have an impact on the services and facilities of the Honolulu Police Department. Due to the increase in patrol area, population, and traffic, we anticipate more calls for police services to the area. We may have more specific comments when details of the project are developed.

If there are any questions, please call Captain Gregory Lefcourt of District 8 at 692-4253 or Ms. Carol Sodehani of the Support Services Bureau at 529-3658.

Sincerely,

BOISSE P. CORREA
Chief of Police

By 
KARL GODSEY
Assistant Chief of Police
Support Services Bureau

cc: Ms. Genevieve Salmonson, OEQC
Mr. Bert Saruwatari, Land Use
Commission, State of Hawaii
✓ Ms. Corlyn Olson Orr, Helbert Haster
& Fee, Planners, Incorporated

Helber Hastert & Fee
Planners, Inc.

October 23, 2004



Dear Participant:

Attached for your review is an Environmental Impact Statement Preparation Notice (EISPN) which was prepared pursuant to the EIS law (Hawaii Revised Statutes, Chapter 343) and the EIS rules (Administrative Rules, Title 11, Chapter 200).

TITLE OF PROJECT: Kapolei West
LOCATION: Oahu, Ewa District
TAX MAP KEY NOS.: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

**YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY NOVEMBER 22, 2004.
PLEASE SEND ORIGINAL COMMENTS TO THE:**

APPLICANT: Aina Nui Corporation
ADDRESS: 1001 Kamokila Boulevard, Suite 255, Honolulu, HI 96707
CONTACT: Donna Goth, President PHONE: (808) 674-3540

**COPIES OF THE COMMENTS SHOULD BE SENT TO THE OFFICE OF ENVIRONMENTAL
QUALITY CONTROL (235 South Beretania Street, Suite 702, Honolulu, HI 96813) AND
THE FOLLOWING:**

ACCEPTING AUTHORITY: Land Use Commission, State of Hawaii
ADDRESS: 235 South Beretania Street, Room 406, Honolulu, HI 96813
CONTACT: Bert Saruwatari, Planner PHONE: (808) 587-3822

CONSULTANT: Helber Hastert & Fee, Planners, Inc.
ADDRESS: 733 Bishop Street, Suite 2590, Honolulu, HI 96813
CONTACT: Corlyn Olson Orr, Project Planner PHONE: (808) 545-2055

If you have no comments but wish to receive a copy of the Draft EIS and participate in the environmental review process, please contact Corlyn Olson Orr at (808) 545-2055 or via e-mail at colsonorr@hhf.com.

Thank you for your participation in the EIS process. We look forward to receiving your comments, questions and suggestions.

Sincerely,

HELBER, HASTERT AND FEE, PLANNERS.

Thomas A. Fee, AICP
President

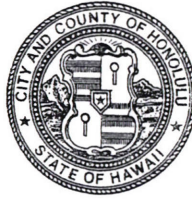
Enclosure

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

3375 KOAPAKA STREET, SUITE H425 • HONOLULU, HAWAII 96819-1869
TELEPHONE: (808) 831-7761 • FAX: (808) 831-7750 • INTERNET: www.honolulufire.org



JEREMY HARRIS
MAYOR



ATTILIO K. LEONARDI
FIRE CHIEF

JOHN CLARK
DEPUTY FIRE CHIEF

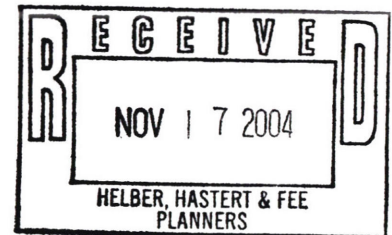
November 10, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Environmental Impact Statement Preparation Notice

Project: Kapolei West
Location: Kapolei, Oahu, Hawaii
Tax Map Keys: 9-1-014: Portion 033
9-1-015: Portions 004 and 020



We received a letter from Mr. Thomas A. Fee of Helber Hastert & Fee Planners, Inc., dated October 23, 2004, requesting that our comments on the above-mentioned project be submitted to you.

The Honolulu Fire Department (HFD) requires that the following be complied with:

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

Ms. Donna Goth, President

Page 2

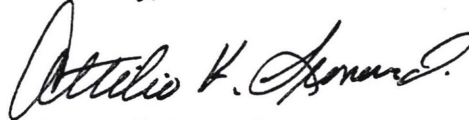
November 10, 2004

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of the 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2 as amended)

3. Provide civil drawings to HFD for review and approval.

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

Sincerely,



ATTILIO K. LEONARDI
Fire Chief

AKL/SK:bh

cc: Ms. Genevive Salmonson, Director

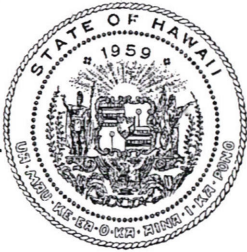
State of Hawaii, Department of Health, Office of Environmental Quality Control

Mr. Bert Saruwatari, Planner

State of Hawaii, Department of Business, Economic Development & Tourism,
Land Use Commission

Ms. Corlyn Olson Orr, Project Planner

Helber Hastert & Fee Planners, Inc.



DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

STRATEGIC INDUSTRIES DIVISION

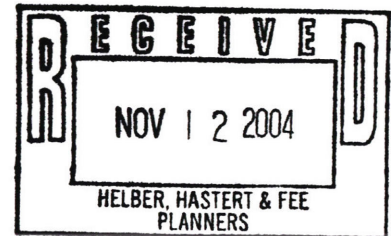
235 South Beretania Street, Leiopapa A Kamehameha Bldg., 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, HI 96804-2359

LINDA LINGLE
GOVERNOR
THEODORE E. LIU
DIRECTOR
STEVE BRETSCHNEIDER
DEPUTY DIRECTOR

Telephone: (808) 587-3807
Fax: (808) 587-3820
Web site: www.hawaii.gov/dbedt/ert

November 8, 2004

Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Honolulu, Hawaii 96707



Subject: Kapolei West
Environmental Impact Statement Preparation Notice (EISPN)
Tax Map Key: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20

Dear Ms. Goth:

In response to your October 23, 2004, notice, thank you for the opportunity to provide comments on the Environmental Impact Statement Preparation Notice (EISPN) for Kapolei West. We note that the proposed action is reclassification of approximately 174 acres of land from the Agricultural to the Urban District to be consolidated with a 373-acre adjacent Urban parcel. The project would result in a 546.8-acre project including residential, golf course, and commercial uses. We would like to call your attention to: (1) State energy conservation goals, (2) energy saving design practices and technologies, and (3) recycling and recycled-content products.

1. **State energy conservation goals.** Project buildings, activities, and site grounds should be designed with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call to your attention HRS 226 18(c)(4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies.

We recommend that you consider City & County of Honolulu Energy Code requirements early on in your project. Hawaiian Electric Co., Inc., (HECO) may also have demand-side management programs that offer rebates and/or incentives for installation of energy efficient technologies.

2. **Energy saving design practices and technologies.** We recommend that energy efficient design practices and technologies be specifically addressed. Energy

COPY

efficiency is improved with effective building location, orientation and massing, and the placement of vegetation for shade or wind protection. Some of the methods and technologies that could be considered, as appropriate, include:

- Establish the building on an east-west axis;
- Minimize east- and west-facing glass;
- Use natural ventilation to increase comfort of occupants;
- Maximize use of natural lighting without heat gain;
- Use high efficiency compact fluorescent lighting;
- Use insulation/radiant barrier for an equivalent R-19 value in ceiling; use ceiling fans;
- Use solar water heating; and
- Use landscaping for dust control and to minimize heat gain to area.

3. **Recycling and recycled-content products.**

- Develop a job-site recycling plan for construction and recycle as much construction and demolition waste as possible;
- Incorporate provisions for recycling into the project – a collection system and space for bins for recyclables; and
- Specify and use products with recycled content such as: steel, concrete aggregate fill, drywall, carpet and glass tile.

If you need clarification of any of the above, please do not hesitate to contact me.

Sincerely,



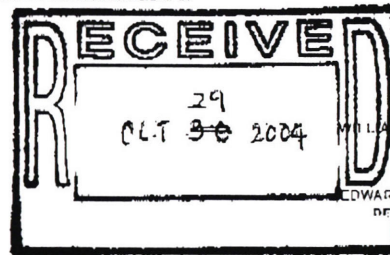
Maurice H. Kaya
Chief Technology Officer

c: OEQC
Land Use Commission
Helber, Hastert and Fee, Planners

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU

1000 ULUKOHA STREET, SUITE 300 • KAPOLEI, HAWAII 96707
TELEPHONE: (808) 692-5561 • FAX: (808) 692-5131 • INTERNET: www.cc.honolulu.hi.us

JEREMY HARRIS
MAYOR



WILLIAM D. BALFOUR, JR.
DIRECTOR

EDWARD T. "SKIPPA" DIAZ
DEPUTY DIRECTOR

October 27, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Kapolei West - Environmental Impact Statement Preparation Notice

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice relating to the development of Kapolei West.

The Department of Parks and Recreation has no comment at this time.

Should you have any questions, please contact Mr. John Reid, Planner, at 692-5454.

Sincerely,

WILLIAM D. BALFOUR, JR.
Director

WDB:mk
(81646)

cc: Mr. Bert Saruwatari, State of Hawaii, Land Use Commission
Ms. Corlyn Orr, Helber Hastert & Fee Planners, Inc.

AINA NUI CORPORATION*1001 Kamokila Blvd. #255 * Kapolei, HI 96707**Fax No: (808) 674-3349***FACSIMILE TRANSMITTAL**

DATE: November 1, 2004

TO: Tom Fee

COMPANY: Helber Haster Fee, Planners, Inc.

FAX NUMBER: 545-2050

RE: Letter from William Balfour re Kapolei West-EIS Preparation Notice

FROM: Donna Goth

Number of pages (including cover sheet): 2

Hard copy to follow: Yes ☐ No ☒

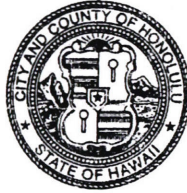
If you do not receive all of the pages, please call Janice Reisch at 674-3268 as soon as possible.

Comments:

CONFIDENTIALITY: This facsimile may contain material that is confidential, privileged, and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and destroy all copies.

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU

715 SOUTH KING STREET, SUITE 311 • HONOLULU, HAWAII 96813
TELEPHONE: (808) 527-5311 • FAX: (808) 527-5498 • INTERNET: www.co.honolulu.hi.us



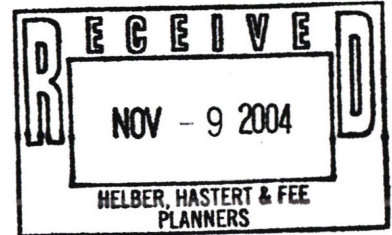
JEREMY HARRIS
MAYOR

MICHAEL T. AMII
DIRECTOR

JOHN R. SABAS
DEPUTY DIRECTOR

November 5, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707



Dear Ms. Goth:

Subject: Environmental Impact Statement Preparation Notice
Kapolei West

We appreciate the opportunity to review and comment on the subject Environmental Impact Statement (EIS) Preparation Notice. Based on our review, we have initially determined that the proposed project should have no impact on any projects or programs of the Department of Community Services.

The draft EIS should provide more detailed information on the types of housing that will be developed in the proposed project in terms of unit sizes, types, and prices. Given the severe shortage of affordable rental housing our community currently faces, it is our preference that the unit mix include an affordable rental housing component that could be developed by a nonprofit developer or nonprofit/for profit partnership using existing affordable housing programs such as the low income housing tax credit program. We would also ask that consideration be given to set aside of a few house lots for the development of group homes for persons with special needs. As a matter of policy, the City and County of Honolulu promotes the dispersal of housing for persons with special needs throughout the community, including new housing developments.

We appreciate your consideration of these comments, and we look forward to reviewing the draft EIS when it becomes available. Questions regarding this matter may be directed to Mr. Keith Ishida at 527-5092.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael T. Amii".

MICHAEL T. AMII
Director

cc: Land Use Commission
Helber Hastert and Fee, Planners

Sandy Hite

LAND USE COMMISSION
STATE OF HAWAII

2004 NOV 26 A 9:14

XC: BS

November 23, 2004

Councilmember Charles Djou
City Council
City and County of Honolulu
530 South King Street
Honolulu, Hawaii 96813

Dear Councilmember Djou:

PROPOSED LANDFILL SITE AT CAMPBELL INDUSTRIAL PARK

I watched part of the Public Works Committee meeting concerning the selection of the landfill site. I was impressed with the valid points you made over concerns of the Campbell Industrial site. You noted that 23 acres as far to small for a landfill. I believe with the construction of the necessary barriers to protect the endangered plants from the trash, the site will be smaller, perhaps by one-third.

My understanding is the Campbell site was purchased for a technology park to develop new technology for waste disposal. I believe the law as authorized by the budget ordinance is that the land be solely use for the purpose as stated in the ordinance and it will be illegal to be used as a dump site. The City Council has been very clear that the budget ordinance be adhere to and it will contradict the Council position if the Campbell site is used as a dump site.

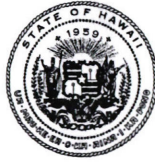
I believe there is a good possibility that the Land Use Commission will reject the Campbell site as unrealistic landfill site knowing all the problems associated with the land even if the City submit it as the location of the next landfill.

Thank you for you time. I will not include my name since some Councilmembers may take my input the wrong way and not as my only purpose that the City does not dig itself into a bigger hole.

Concern Citizen

Cc: Land Use Commission

PHONE (808) 594-1888



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

LAND USE COMMISSION
STATE OF HAWAII

2004 NOV 10 A 9:10

FAX (808) 594-1865

*Sandy - pls note
and include on
meeting list*

HRD04/1587

November 4, 2004

Anthony J. H. Ching
Executive Director
Land Use Commission
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804-2359

Re: Petition to Amend Land Use Boundaries from Agricultural to Urban, Docket No. A04-753, Aina Nui Corporation, Honouliuli, Ewa District, O'ahu

Dear Mr. Ching:

The Office of Hawaiian Affairs (OHA) is in receipt of your September 29, 2004, Notification of Petition Filing by the Aina Nui Corporation, on behalf of The Estate of James Campbell, to reclassify approximately 174.209 acres in TMK: 9-1-14: 033 and 9-1-15: 004 and 020, from agricultural to urban.

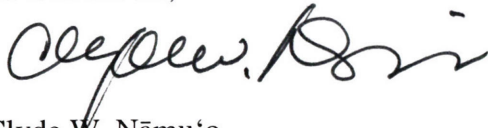
While OHA does not plan to participate in the hearing for this matter as an intervenor, pursuant to Section 15-15-52, HAR, OHA would maintain an interest in participating in the hearing as a witness regarding possible adverse impacts to native Hawaiian cultural resources and practices in the area which may be affected by such a reclassification.

Towards this end, OHA would like to receive notification of any scheduled hearing or other actions regarding this particular petition to allow our office to assess the level of our involvement, if any, in this particular application.

If you have any questions or concerns, please contact Kai Markell, Policy Advocate, at 594-1945 or kaim@oha.org. Once again, thank you for your patience during our review and assessment of this important matter.

Mr. Anthony J. H. Ching
November 4, 2004
Page 2

‘O wau iho nō,

A handwritten signature in black ink, appearing to read 'Clyde W. Nāmu‘o', with a stylized flourish at the end.

Clyde W. Nāmu‘o
Administrator

**IMANAKA
KUDO &
FUJIMOTO**

A Limited Liability Law Company

September 29, 2004

LAND USE COMMISSION
STATE OF HAWAII

2004 SEP 29 P 12: 50

Mitchell A. Imanaka

Benjamin A. Kudo

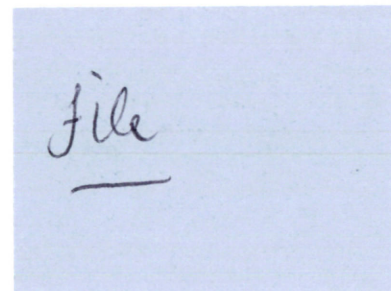
Wesley M. Fujimoto

Jon M. H. Pang

Richard T. Asato, Jr.

Naomi U. Kuwaye

Mr. Anthony J.H. Ching, Executive Officer
Mr. Bert Saruwatari, Planner
Land Use Commission
State of Hawaii
State Office Tower, Room 406
235 S. Beretania Street
Honolulu, Hawaii 96813



**Aina Nui Corporation
Environmental Impact Statement Preparation Notice
Kapolei West**

Gentlemen:

We are submitting for your review the following:

1. Draft cover letter to Office of Environmental Quality Control (OEQC) for the State of Hawaii, for the Land Use Commission's submittal of the EISPN for publication in the October 23, 2004 issue of the *Environmental Notice* on disk;
2. Four copies of Aina Nui Corporation's Kapolei West Environmental Impact Statement Preparation Notice ("EISPN") for property comprised of approximately 546.8 acres and described as Tax Map Key Numbers 9-1-14:33 (por.); 9-1-15:4, 18 and por. 20.
3. *OEQC Bulletin Publication Form* for inclusion in the October 23, 2004 issue of the *Environmental Notice*; and
4. Project Summary and Brief Description on disk.

An original and 15 copies of the EISPN attached as Exhibit 7 to Aina Nui Corporation's Petition for Land Use District Boundary Amendment, Verification; Exhibits "1" – "16"; Certificate of Service, are being submitted concurrently herewith.

Of Counsel

R. Brian Tsujimura

Perfecto R. Yasay, Jr. *

* admitted to practice only in
New York and Philippines

Hon. Mario R. Ramil

Former Associate Justice
Hawaii Supreme Court

TOPA Financial Center

Fort Street Tower

745 Fort Street, 17th Floor

Honolulu Hawaii 96813

Phone: (808) 521-9500

Facsimile: (808) 541-9050

info@imanakakudo.com

http://www.imanakakudo.com

Mr. Anthony J.H. Ching
Mr. Bert Saruwatari
September 29, 2004
Page 2

Should you have any questions or require any additional information, please contact the undersigned.

Very truly yours,

IMANAKA KUDO & FUJIMOTO

A handwritten signature in cursive script, reading "Bree Kurihara".

Benjamin A. Kudo
Naomi U. Kuwaye
Bree M. Kurihara

Enclosures

imation

Draft Letter to OEQC
Kapolei West Project

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The Senate
State of Hawaii

STATE CAPITOL
HONOLULU, HAWAII 96813

November 22, 2004

LAND USE COMMISSION
STATE OF HAWAII

2004 NOV 24 P 1:02

XC:BS/TC

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Blvd., Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Upon review of the Environmental Impact Statement Preparation Notice for Kapolei West, prepared for your company by Herber Hastert & Fee, Planners, I would like to offer the following comments which express my great anticipation as well as concerns regarding the Kapolei West project. As you are aware, the development of this area will be highly beneficial to the people of Kapolei, provided, however, that the proper infrastructure is in place. The continued expansion of this area will result in increased population, which will in turn require the construction of adequate roadways to accommodate additional traffic, as well as sufficient educational facilities.

Several different projects, undertaken by varying entities, are currently being contemplated for the Kapolei area. As a result, the residents of the various communities within Kapolei are greatly concerned that serious traffic issues will result should these projects, including the Kapolei West project, be constructed prior to the completion of the proper roadway infrastructure. Proper timing of the construction of adequate infrastructure is crucial in order to ensure that current traffic problems are not further exacerbated. Pursuant to section 2.2 of the Preparation Notice, it is indicated that no roadways with direct connections between Kapolei West and the adjacent communities of Honokai Hale and Nanakai Gardens will be included due to strong community sentiment against the addition of traffic in those areas. The continued attention to these types of concerns raised by the residents of Honokai Hale, Nanakai Gardens and Kapolei is appreciated and should be encouraged throughout this arduous process.

The Preparation Notice also indicates that the project is substantially consistent with the Hawaii State Plan and the City and County of Honolulu General Plan in regard to meeting the objectives of encouraging transportation systems that accommodate the current and future development needs of a community and helping Oahu continue to be a desirable place to live. Although this is the assessment, I believe that the status of this project must continue to be closely monitored in order to ensure that the proper infrastructure exists prior to its further undertaking and completion. Currently, traffic is particularly congested in the area fronting the Kapolei Shopping Center. As the developers, you should endeavor to do whatever possible to mitigate the negative impact on traffic that the project may pose.

Additionally, as previously indicated, the need for additional educational facilities for the children of Kapolei is of the utmost importance. The increased population will amplify the already critical problem of overcrowded classrooms. Timing of the construction of new developments in this area must also be carefully designed and planned so as to ensure that the residents of Kapolei are provided with safe and adequate roads and facilities to meet the growing needs of the area.

Thank you for the opportunity to submit comments on the Preparation Notice. I look forward to receiving further information, particularly that prepared as a result of the Traffic Impact Assessment, and to working together so as to better understand how this project may be successfully completed.

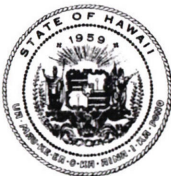
Mālama pono,



Brian Kanno
State Senator, 19th District

cc: Office of Environmental Quality Control
Bert Saruwatari, Land Use Commission, State of Hawaii
Corlyn Olson Orr, Helber Hastert & Fee, Planners, Inc.

LINDA LINGLE
GOVERNOR OF HAWAII



GENEVIEVE SALMONSON
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

November 22, 2004

Ms. Donna Goth
'Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawai'i 96793

Mr. Anthony Ching.
State of Hawai'i - Department of Business Economic Development and Tourism
Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawai'i 96813

Ms. Carolyn Olson Orr
Helber Hastert and Fee Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813

Dear Mesdames Goth and Orr, and Mr. Ching:

The Office of Environmental Quality Control has reviewed your environmental assessment for the Kapolei West Project, Tax Map Key 9-1-14 por. 33; 9-1-15 por. 4 and por. 20, situated in the judicial district of 'Ewa and offers the following comment for your consideration and response.

1. **Sustainable Building Guidelines:** In construction of the proposed housing, please refer to the "Sustainable Building Guidelines" contained in the Office of Environmental Quality Control's "A Guidebook to the Hawaii State Environmental Review Process" found online at <http://www.state.hi.us/health/oeqc/index.html>.
2. **Cultural Impacts:** While the environmental assessment discusses the archaeological and historical aspects of the project required under Chapter 6E, Hawai'i Revised Statutes, it does not discuss contemporary cultural resources and practices, if any. Please refer to the guidance for cultural impact assessment found on our Internet site above.

Thank you for the opportunity to comment. If there are any questions, please call Mr. Leslie Segundo, Environmental Health Specialist, at (808) 586-4185.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Salmonson".
GENEVIEVE SALMONSON
Director

RECEIVED
04 NOV 24 AIO:36
OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

LAND USE COMMISSION
STATE OF HAWAII
NOV 24 P 1:02
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FAX TRANSMITTAL SHEET

ENVIRONMENTAL CENTER
University of Hawaii
2500 Dole Street, Krauss Annex 19, Honolulu, HI 96822
Telephone: (808) 956-7361 Fax: (808) 956-3980

DATE: 11/22/2004

FROM: John Harrison

TO: Donna Goth, Aina Nui Corp. (674-3349)

Tom Fee / Corlyn Olson Orr, (545-2050)
Helber Hastert & Fee, Planners

Anthony Ching, LUC (587-3827)

OEQC (586-4186)

SUBJECT: EISPN
Kapolei West

PAGES: 4
(incl. cover page)

LAND USE COMMISSION
STATE OF HAWAII

2004 NOV 23 A 7:20

XC-B511C

UNIVERSITY OF HAWAII

Environmental Center

November 22, 2004

EA: 0309

Ms. Donna Goth
Aina Nui Corporation
1001 Kamokila Boulevard
Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Environmental Impact Statement Preparation Notice
Kapolei West
Ewa, Oahu

'Aina Nui Corporation, an affiliate of the Estate of James Campbell, has filed a petition for a State Land Use District Boundary Amendment to reclassify approximately 174.2 acres of land from the Agricultural District to the Urban District (referred to as the "Petition Area") with the State Land Use Commission. The Petition Area is located in 'Ewa, O'ahu and consists of Tax Map Key parcels 9-1-14: 33 (por.), 9-1-15: 4 (por.), and 9-1-15:20 (por.). The Petition area straddles the State-owned, historic O'ahu Railway & Land Company (OR&L) Railroad right-of-way (ROW). Development proposed for the Petition Area (referred to as the Proposed Action) includes approximately 1,200 low and medium-density residential units, approximately 60 acres of golf course, and nearly 28 acres of park and open space.

The Petition Area is surrounded by the 372.6-acre area formerly known as Ko 'Olina Phase II to the north (urbanized in 1991 under Docket A90-655), Ko 'Olina Resort to the west, Kalaeloa Barbers Point Harbor and the Kapolei Business Park to the south, and the City of Kapolei and Kalaeloa Boulevard to the east.

The Petition Area is proposed to become part 'Aina Nui Corporation, and it includes a petition filed with the State Land Use Commission for a State Land Use District Boundary Amendment to reclassify approximately 174.2 acres of the project area from the Agricultural District to the Urban District. The Petition Area consists of Tax Map Key parcels 9-1-14: 33 (por.), 9-1-15: 4 (por.), and 9-1-15:20 (por.), and is located in the southern portion of the project, straddling the OR&L Railroad ROW.

Development proposed for the Petition Area includes approximately 1,200 low and medium-density residential units, approximately 60 acres of golf course, and nearly 28 acres of park and open space. The boundary amendment would allow development of the Petition Area and approximately 372.6 acres of land within the Urban District adjacent to the Petition

2500 Dole Street, Krauss Annex 19, Honolulu, Hawaii 96822

Phone: (808) 956-7361

An Equal Opportunity/Affirmative Action Institution

Ms. Donna Goth
November 22, 2004
Page 2 of 3

Area for the proposed Kapolei West project. In its entirety, The entire Kapolei West project is planned to include an 18-hole championship golf course, approximately 2,400 single and multi-family homes, neighborhood parks and a pedestrian pathway system to link the neighborhoods.

Regional commercial and transit/mixed-use areas are planned to enhance the City of Kapolei and support both the neighboring communities and the proposed Kapolei West community. Vehicular access to the project area is planned via a new segment of Kapolei Parkway connecting to Ali'i Nui Drive to the west and Kalaeloa Boulevard to the east; the proposed Hanua Street extension on the east; and a new roadway connected connecting to Farrington Highway to the west. Three new roadways, including two smaller neighborhood streets and the proposed Hanua Street extension, and two golf cart paths, are planned to cross the OR&L Railroad ROW.

Pursuant to Chapter 343, Hawai'i Revised Statutes, a Draft Environmental Impact Statement (DEIS) is being prepared for the project's proposed use of a historic site located on State lands (i.e., planned roadways cross the OR&L Railroad ROW, which is owned by the State of Hawai'i and listed on the National Register of Historic Places). The forthcoming DEIS will be organized to address both potential direct impacts and mitigation measures of the Proposed Action (i.e., reclassification of approximately 174.2 acres from the Agricultural to the Urban District) and the potential indirect and cumulative impacts associated with the larger, 547.8-acre West Kapolei project area.

This review was conducted with the assistance of Peter Flachsbart, Urban and Regional Planning; and Landin Johnson of the Environmental Center.

General Comments

The Environmental Impact Statement Preparation Notice (EISPN) appears to be prepared competently and touches on many points that an EISPN should. At this stage in the EIS process, there is limited content and specifics on which to comment. Consequently, our reviewers have only a few comments at this stage.

Specific Comments

Energy Consumption & Efficiency

Our reviewers believe the DEIS should thoroughly discuss the demands for electrical energy of this project, given that Hawaiian Electric Company (HECO) claims they have little spare capacity to generate more electricity at the present time. Our reviewers also strongly recommend the use of solar water heating and alternative energy systems (e.g., photovoltaic) for this project. The use of the alternative energy systems will undoubtedly help offset the power demand for the project and alleviate some of the concern as stated above. Other

Ms. Donna Goth
November 22, 2004
Page 3 of 3

energy conservation measures should be implemented in construction and design of the project (e.g., compact fluorescent lighting, light colored roofing, situating buildings to utilize any natural air flow for cooling, etc.).

Solid Waste

It is unclear whether the DEIS will quantify the solid waste generated by the 2,370 dwelling units in the project area (p. 7). This is a critical issue as the City & County of Honolulu is searching for a new landfill site.

Schools

As with the above comments, it is also unclear if the DEIS will quantify the number of school-age children and teenagers who will live there. This impact is also of concern as it is our reviewers' understanding that the existing schools are already overcrowded in Kapolei.

Landscaping

The use of native plants in landscaping, especially plants naturally acclimated to the project site's climate and consume a limited amount of water, is highly recommended by our reviewers. Drainage systems should also be designed to divert storm water to landscaping.

Water Use

The use of reclaimed water for the golf course and open space irrigation is strongly supported by our reviewers, but also recommend is the use in toilets, urinals, and landscaping where permitted. Other such water conservation measures should also be implemented in the project construction (e.g., low-flow toilets and shower heads, etc.).

Thank you for the opportunity to review this EISPN.

Sincerely,



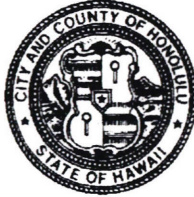
John T. Harrison, Ph.D.
Environmental Coordinator

Cc: Helber Hatert & Fee, Planners, Inc.
Land Use Commission
OEQC
James Moncur, WRRC
Peter Flachsbarth
Landin Johnson

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 523-4414 • FAX: (808) 527-6743
DEPT. WEB SITE: www.honoluluodpp.org • CITY WEB SITE: www.honolulu.gov

JEREMY HARRIS
MAYOR



ERIC G. CRISPIN, AIA
DIRECTOR

BARBARA KIM STANTON
DEPUTY DIRECTOR

2004/ELOG-2406 (RYS)

November 17, 2004

Mr. Thomas A. Fee, AICP
President
Helber Hastert & Fee, Planners, Inc.
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Attn: Corlyn Olson Orr, Project Planner

Dear Mr Fee:

Kapolei West, Ewa, Oahu, Hawaii
Environmental Impact Statement Preparation Notice (EISPN)

This is in response to your request dated October 23, 2004, for comments on the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Kapolei West Project, which you are preparing for Aina Nui Corporation. We have reviewed the proposal and offer the following comments for your review and consideration for inclusion in the Draft Environmental Impact Statement (DEIS):

1. EWA "DPLUM" on pages ii, 34, 36, and figure 8: should be revised to EWA DPULUM to refer to the Ewa Development Plan Urban Land Use Map.
2. Section 2.3 Utility Requirements: In addition to the discussion of the utility requirements in Section 2.3, the DEA should include discussions on the adequacy of existing public facilities and services, and the necessity for new public facilities and services, to support the proposed project. These discussions should include the potential transportation regional impacts, including the feasibility of industrial based traffic through residential areas of the project, and mitigating measures in the context of the Ewa Development Plan area.
 - a. Add a discussion of the Kapolei Interceptor Sewer master plan. We suggest calling Scott Gushi of our Wastewater Branch at 523-4886 to discuss the completion date and capacity requirements of the proposed sewer master plan. A sewage capacity reservation is contingent on submittal and approval of a Site

LAND USE COMMISSION
STATE OF HAWAII
2004 NOV 18 P 1:50
X. PS/TC

Development Division Master Application (Sewer Connection). This project will be liable for payment of the Wastewater System Facility Charge.

- b. A drainage master plan will be required for the development of the area.
3. Discuss how the proposed project is consistent with the objectives and policies of the City and County of Honolulu's General Plan listed on pages 31 to 33 of the EISPN.

Please make the following changes to Section 3.12.4 City and County of Honolulu General Plan discussed on pages 30 through 33:

- a. The 1992 GP was last amended on October 3, 2002 to reflect the changes in Population Distribution percentages in Resolution 02-205, CD1, instead of in 2003 as cited.
 - b. II. Economic Activity – Objective G: Policy 3 vice 2 as cited.
 - c. IV. Housing – Objective C: Policy 3 vice 4 as cited.
 - d. V. Transportation and Utilities – Objective A: Policy 1: “c” and “d” vice “b” and “c” as cited.
 - e. X. Culture and Recreation – Policy 9 and 10 cited are for Objective D (To provide a wide range of recreational facilities and services that are readily available to all residents of Oahu) vice for Objective B.
4. Expand Section 2.6 on page 13 to include a discussion of the proposed rezoning for “Zone Change 2”, and how the proposed project will be consistent with the surrounding zoning. Addition of a new zone change map to illustrate the proposed zone changes would be helpful.
5. Discuss how the proposed project supports or is consistent with the Ewa Development Plan, including but not limited to the following:
- a. How the proposed golf course is consistent with the Ewa DP open space guidelines for golf courses (Section 3.1.4.6 on page 3-8 of the Ewa DP).
 - b. The section on parks should be expanded:
 - (1) Include a discussion of how the acreage of the proposed parks compare with the recommended minimum of two acres of park per 1,000 residents (see page 3-16 of the Ewa DP).

Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.
Page 3
November 17, 2004

- (2) Include how the proposed parks are consistent with the Ewa DP guidelines on the development of community-based parks (Section 3.3.2.1, page 3-17). Please specifically address the following:
 - The proposed location of the elementary school and the three planned parks do not support the guideline regarding co-locating parks with schools (see also Section 4.7.2, page 4-32 of the Ewa DP); and
 - The location of the three planned parks do not support the guideline regarding siting parks at the center of neighborhoods to maximize accessibility. The largest planned park, the 14.3-acre historic park, and the planned 2.8-acre passive park, are located at the edge of the proposed projects adjacent to the golf course. Accessibility to these parks may also be compromised by the OR&L right-of-way.
- c. How the proposed project will support the policies and principles regarding views in Section 3.4 of the Ewa DP (beginning on page 3-19).
- d. How the proposed project supports the guidelines in the Ewa DP related to the OR&L Historic Railway (Section 3.4.3.1, page 3-23).
- e. The EISPN states that no roadway connections would be made between the proposed project and the adjacent communities of Honokai Hale and Nanakai Gardens. This does not support the Ewa DP planning principles or design guidelines on developing a comprehensive roadway network (page 4-15). The *Smart Growth* principles of connectivity between communities should be promoted rather than hindered. The EIS should provide a compelling reason for the absence of the roadway connections.
- f. The following editorial changes are suggested:
 - (1) The planned 1.8-acre passive park to the south of the Honokai Hale subdivision (on page 10 of the EISPN) is not shown on Figure 3.
 - (2) Include the DPR park classification (neighborhood, community, or district park) for each of the three parks proposed and for the existing Kamokila Park.

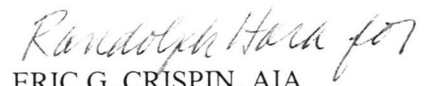
Mr. Thomas A. Fee, AICP, President
Helber Hastert & Fee, Planners, Inc.

Page 4
November 17, 2004

- (3) Some of the land use designation labels on Figure 8 are incorrect (the L/MDR and HDR). The leader from the PK/GC label on the upper left of the map also points to the wrong area. Perhaps the PK/GC label should be changed to L/MDR.
 - (4) The sentence on page 34, second paragraph that begins with "The Phasing Map identifies ..." is confusing. The Kapolei Low Density Apartments (LDA) project identified in the sentence is not shown on the Ewa DP Phasing Map. We suggest revising this sentence and the remaining portion of the paragraph in the EIS.
6. Page 36 of the EISPN mentions that a portion of the project area lies within the SMA. The applicant should include a map showing the project area and the SMA boundary line, and indicate the square footage of the project area within the SMA.
 7. Anticipated Impacts (page 38): The potential impacts of adjacent industrial uses on the proposed residential and park uses, and possible mitigation measures should be discussed.
 8. In the discussion of the archeological assessments, include the standard warranty that "Should archeologically significant features be uncovered, construction will be halted and immediate archeological consultation will be sought with the Department of Land and Natural Resources State Historic Preservation Division in accordance with applicable regulations."
 9. Add the Ewa Neighborhood Board No. 23 to the list of "Other Agencies, Organizations and Individuals" to be consulted during the preparation of the DEIS to Section 7.0 on page 43.

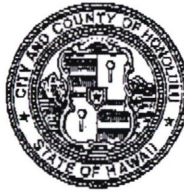
We will reserve further comments for later after we review the completed DEIS. Should you have any questions, please contact Ray Sakai of our staff at 523-4047.

Sincerely yours,


ERIC G. CRISPIN, AIA
Director of Planning and Permitting

EGC:js

cc: Aina Nui Corporation
State Land Use Commission
Office of Environmental Quality Control
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FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU3375 KOAPAKA STREET, SUITE H425 • HONOLULU, HAWAII 96819-1869
TELEPHONE: (808) 831-7761 • FAX: (808) 831-7750 • INTERNET: www.honolulufire.orgJEREMY HARRIS
MAYORATTILIO K. LEONARDI
FIRE CHIEFJOHN CLARK
DEPUTY FIRE CHIEF

November 10, 2004

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Dear Ms. Goth:

Subject: Environmental Impact Statement Preparation Notice

Project: Kapolei West
Location: Kapolei, Oahu, Hawaii
Tax Map Keys: 9-1-014: Portion 033
9-1-015: Portions 004 and 020

We received a letter from Mr. Thomas A. Fee of Helber Hastert & Fee Planners, Inc., dated October 23, 2004, requesting that our comments on the above-mentioned project be submitted to you.

The Honolulu Fire Department (HFD) requires that the following be complied with:

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

XC:BSPTC
2004 NOV 18 P 1:37
LAND USE COMMISSION
STATE OF HAWAII

Ms. Donna Goth, President

Page 2

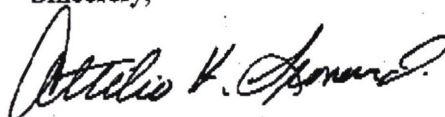
November 10, 2004

On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of the 150 feet (45 720 mm) from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2 as amended)

3. Provide civil drawings to HFD for review and approval.

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

Sincerely,



ATTILIO K. LEONARDI

Fire Chief

AKL/SK:bh

cc: Ms. Genevive Salmonson, Director

State of Hawaii, Department of Health, Office of Environmental Quality Control

Mr. Bert Saruwatari, Planner

State of Hawaii, Department of Business, Economic Development & Tourism,
Land Use Commission

Ms. Corlyn Olson Orr, Project Planner

Helber Hastert & Fee Planners, Inc.



STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM
LAND USE COMMISSION

P.O. Box 2359
Honolulu, Hawaii 96804-2359
Telephone: 808-587-3822
Fax: 808-587-3827

October 11, 2004

Ms. Genevieve Salmonson
Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: LUC Docket No. A04-753 Aina Nui Corporation, a Hawai'i corporation
Environmental Impact Statement Preparation Notice (EISPN) - Kapolei West
Ewa, Oahu, Hawaii
Tax Map Keys: 9-1-14: por. 33 and 9-1-15: por. 4 and por. 20

On October 7, 2004, the Land Use Commission made a determination that the subject project may generate significant impacts on the environment to warrant the preparation of an Environmental Impact Statement.

We respectfully request the publication of the EISPN for the subject project in the next available issue of The Environmental Notice.

Enclosed please find the following:

1. OEQC Bulletin Publication Form
2. Project Summary Description (an electronic copy is also provided via diskette)
3. Four Copies of the EISPN

A copy of the Commission's Order reflecting its action of October 7, 2004, will be provided to you under separate cover.

Please feel free to contact me at 587-3822, should you require clarification or any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony J. H. Ching".
ANTHONY J. H. CHING
Executive Officer

Enclosures

For Publication in the OEQC Environmental Notice

1. Project Name: Kapolei West

Type of Document (*check one*): ☐ Draft EA ☐ Final EA ☒ EIS prep notice ☐ draft EIS ☐ final EIS ☐ NEPA ☐ Other (explain):

check if applicable: ☐ revised document ☐ supplemental document

Legal Authority (*check one*): ☒ chapter 343 HRS ☐ Oahu SMA ☐ NEPA
Agency determination: ☐ Anticipated FONSI ☐ FONSI ☐ FEIS acceptance

Applicable sections (*check all that apply*):

- | | |
|--|--|
| ☒ use of state or county lands or funds | ☐ use of land in the Waikiki district |
| ☐ use of conservation district lands | ☐ amendment to county general plan |
| ☐ use within shoreline setback area | ☐ reclassification of conservation lands |
| ☒ use of historic site or district | ☐ construction or modification of helicopter facilities |
| ☐ wastewater facility, waste-to-energy facility, landfill, oil refinery, or power-generating facility | |

2. Island: Oahu
Judicial District: Ewa
Tax Map Key Number: (1) 9-1-14: por. 33; 9-1-15: por. 4 and por. 20
3. Applicant or proposing agency: Aina Nui Corporation
Address: 1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707
Contact: Ms. Donna Goth, President Phone: (808) 674-3540
4. Approving Agency (EAs) or Accepting Authority (EISs): State of Hawaii Land Use Commission
Address: 235 South Beretania Street, Room 406
Honolulu, Hawaii 96813
Contact: Anthony Ching, Executive Officer Phone: (808) 587-3822
5. Consultant: Helber Hastert & Fee, Planners
Address: 733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Contact: Corlyn Olson Orr, Project Planner Phone: (808) 545-2055
6. Public Comment Deadline: November 22, 2004
7. Permits required prior to implementation:
State Land Use District Boundary Amendment, Zone Change, Special Management Area Permit,
Project Water and Wastewater Master Plans, Subdivision Approvals, Grading, Building
8. Project Summary (*name of file*): KapoleiWestEISPN-OEQC.doc
9. Public Library Copy: Kapolei Public Library, October 23, 2004 (*not required for final EAs*)
10. ☐ Please publish notice of (*check all that apply*): ☐ Safe Harbor Agreement ☐ Accreted land ☐
Habitat conservation plan ☐ Incidental take license
11. This form was prepared by: Corlyn Olson Orr, Helber Hastert & Fee, Planners
Phone: 808) 545-2055

**Kapolei West Project Summary
For Publication in the OEQC Environmental Notice**

Aina Nui Corporation, an affiliate of the Estate of James Campbell, has filed a petition for a State Land Use District Boundary Amendment to reclassify approximately 174.2 acres of land from the Agricultural District to the Urban District (referred to as the "Petition Area") with the State Land Use Commission. The Petition Area is located in Ewa, Oahu and consists of Tax Map Key parcels 9-1-14: 33 (por.), 9-1-15: 4 (por.), and 9-1-15:20 (por.). The Petition area straddles the State-owned, historic Oahu Railway & Land Company (OR&L) Railroad right-of-way (ROW). Development proposed for the Petition Area (referred to as the Proposed Action) includes approximately 1,200 low and medium-density residential units, approximately 60 acres of golf course, and nearly 28 acres of park and open space.

The Petition Area is surrounded by the 372.6-acre area formerly known as Ko Olina Phase II to the north (urbanized in 1991 under Docket A90-655), Ko Olina Resort to the west, Kalaeloa Barbers Point Harbor and the Kapolei Business Park to the south, and the City of Kapolei and Kalaeloa Boulevard to the east.

The Petition Area is proposed to become part of Kapolei West, a master-planned residential and golf community that includes the former Ko Olina Phase II project area, encompassing a total project area of approximately 547.8 acres. The Kapolei West project is planned to include an 18-hole championship golf course, approximately 2,400 single and multi-family homes, neighborhood parks and a pedestrian pathway system to link the neighborhoods. Regional commercial and transit/mixed-use areas are planned to enhance the City of Kapolei and support neighboring communities and the proposed Kapolei West community. Vehicular access to the project area is planned via a new segment of Kapolei Parkway connecting to Alii Nui Drive to the west and Kalaeloa Boulevard to the east; the proposed Hanua Street extension on the east; and a new roadway connecting to Farrington Highway to the west. Three new roadways, including two smaller neighborhood streets and the proposed Hanua Street extension, and two golf cart paths, are planned to cross the OR&L Railroad ROW.

Pursuant to Chapter 343, Hawaii Revised Statutes, a Draft Environmental Impact Statement (DEIS) is being prepared for the project's proposed use of a historic site located on State lands (i.e., planned roadways cross the OR&L Railroad ROW, which is owned by the State of Hawai'i and listed on the National Register of Historic Places). The forthcoming DEIS will be organized to address both potential direct impacts and mitigation measures of the Proposed Action (i.e., reclassification of approximately 174.2 acres from the Agricultural to the Urban District) and the potential indirect and cumulative impacts associated with the larger, 547.8-acre West Kapolei project.



STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM
LAND USE COMMISSION

P.O. Box 2359
Honolulu, Hawaii 96804-2359
Telephone: 808-587-3822
Fax: 808-587-3827

October 1, 2004

Ms. Genevieve Salmonson
Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: LUC Docket No. **A04-753/Aina Nui Corporation**

The Land Use Commission has received a Petition for Land Use District Boundary Amendment from Aina Nui Corporation.

We request that the information provided be printed in the next issue of The Environmental Notice.

Enclosed is the information in a hard copy format with formatting codes obtained from your office. Also enclosed is the document on a diskette for your convenience. The file name for the Petition for Land Use District Boundary Amendment is A04753.doc.

We ask that the diskette be returned to our office after the information has been transferred to your system.

Thank you for your assistance in this matter. Please feel free to contact Bert Saruwatari of my office at 587-3822, should you require clarification or any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony J. H. Ching".
ANTHONY J. H. CHING
Executive Officer

Enclosures

<Category>Land Use Commission
<Islebullet>o
<Project>Kapolei West

<Body text 10pt>The LUC has received the following petition for land use district boundary amendment:

<List>Docket No./

Petitioner: A04-753/Aina Nui Corporation
Location: Ewa, Oahu, Hawaii
Acreage: 174.209 acres
TMK: 9-1-14: por. 33; 9-1-15: por. 4 and por. 20
Request: Agricultural to Urban
Date Filed: September 29, 2004

<Body text 10pt>If you would like further detailed information on this matter, please contact:

State Land Use Commission

Location Address

Leiopapa A Kamehameha Building
(State Office Tower)
235 S. Beretania Street, Room 406
Honolulu, Hawaii 96813

Mailing Address

P.O. Box 2359
Honolulu, Hawaii 96804-2359

Phone: 587-3822

ORIGINAL

RECEIVED

October 6, 2005

OCT 6 2005

Mr. Randall F. Sakumoto, Chairman
and the Members of the
State Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

State of Hawaii
LAND USE COMMISSION

Re: Docket No. A04-753/Aina Nui Corporation

My name is Maeda Timson and I am a 34-year resident of Makakilo. I am the chair of the Makakilo/Kapolei/Honokai Hale Neighborhood Board and, as a matter of information, in July 2004, the Makakilo/Kapolei/Honokai Hale Neighborhood Board voted to support the Kapolei West Project.

I am also testifying today as a mother and grandmother who cares about the future of this community. I support Aina Nui Corporation's petition because I can see how Kapolei West benefits not just this community but the broader region and the island as well in the long term. Less than 15 years ago, the only growth we had here was sugar cane. We now have 25,000 jobs in this region and many services and conveniences such as shopping centers and parks. Much of this is due to Campbell Estate's vision of directing growth here which brought jobs closer to where we live, stimulated our economy and provided a range of housing opportunities.

I highly recommend your approval of this petition.

Sincerely,



Maeda Timson
92-684 Nohona St.
Kapolei, Hi. 96707
(B) 525-5601
(R) 672-9414

ORIGINAL

October 6, 2005

Mr. Randall F. Sakumoto, Chairman
and Members of the
State Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

RECEIVED

OCT 6 2005

STATE OF HAWAII
LAND USE COMMISSION

Subject: Docket No. A04-753/Aina Nui Corporation

My name is Jane Ross. I have been a resident of Honokai Hale for over 40 years. Honokai Hale is the residential community immediately adjacent to the Kapolei West project which is the subject of the petition before you. I am also a member of the Makakilo/Kapolei/Honokai Hale Neighborhood Board.

I am here to testify in support of the petition and to let you know that Aina Nui Corporation has gone to great lengths to work with us at Honokai Hale. They came to listen to our concerns and made numerous adjustments to their land plan to address those concerns. They continue to keep us informed and are responsive to our needs. As an affiliate of Campbell Estate, Aina Nui continues Campbell Estate's long history of being a good neighbor and a responsible developer who can be trusted to do the right thing. The projects of Campbell Estate and its affiliates have brought jobs and services closer to our community and have improved the quality of our lives. I believe their Kapolei West project would be a positive addition to our community and encourage your support of this petition.

Sincerely,

Jane A. Ross
Jane Ross

A04-753
Aina Nui Corp.

Public Witness

PUBLIC WITNESS SIGN IN SHEET

Please indicate your address if
you would like to receive future
notices regarding this docket.

DATE: Oct. 6, 2005

DOCKET NO.: A04-753/Aina Nui
Corporation

	Please PRINT name	Organization	Address	Zip Code
1.	Maeda Timson	Kapa Lei Neighborhood Board	672-9414	
2.	Jane H. Ross	Honokani Hale	92-783 Lualoa Pl	96707
3.	Michael Dudley			
4.	Lorraine Martinez			
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				

ORIGINAL

Ralph F. Harris, President
Ko Olina Fairways Association of Apartment Owners
92-1527-H Aliinui Drive
Kapolei, Hawaii 96707-2232

Phone: (808) 679-0085
Fax: (808) 679-0086

October 19, 2005

State Land Use Commission
235 So. Beretania Street
Honolulu, HI 96813

RE: A04-753 Aina Nui Corporation Application
Title of Project: Kapolei West Expansion Area
Location: Oahu, Ewa District
Tax Map Key Nos: (1) 9-1-14: portion 33; 9-1-15: portion 4 and portion 20

Dear Commissioners:

Thank you for the opportunity to submit testimony to the State Land Use Commission regarding the application to change the Ewa district Land Use Plan by Aina Nui Corporation, a development company owned by the Estate of James Campbell.

I represent 280 homeowners at the Ko Olina Fairways, an existing residential town home condominium project which abuts the proposed Kapolei West project to the East of Ko Olina Resort. Aina Nui has presented their plan to our homeowners and received comments and concerns from other board members and other residents at the Ko Olina Fairways. Included with this letter are copies of the relevant correspondence. I also included a copy of the response I received from Aina Nui's consultant which brushed off our concerns.

We are opposed to the approval of the application that takes away industrial lands and future employment areas and facilitates an unsuitable development plan.

The AOA Ko Olina Fairways strongly opposes four (4) major areas of "close proximity" to the Fairways. Our objections include 1) The proposed roadway plan that results in a four way intersection at Road "D" and Aliinui Drive. The proposed road will run along the eastern boundary of the Ko Olina Resort and Marina property line and that is next to the Ko Olina Fairways. 2) The proposed commercial site at the new intersection would be a disaster for attracting more people to this new focal point and this will threaten the quality of life and security concerns of homeowners. 3) In the EIS the

LAND USE COMMISSION
STATE OF HAWAII
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traffic congestion that would occur at the intersection with Aliinui Drive and Road "D" would be further complicated by the Resort gate that will need to be installed and manned 24 hours a day and 4) We did notice that in comparing the changes in your master plan that this project would result in three thousand (3,000) lost industrial jobs compared to alternative uses!

We have recommended that Aina Nui revisit their plan as our concerns were not directly addressed by their consultant.

Thank you for including our comments and objections in this Land Use hearing . Should you have any questions or comments please do not hesitate to contact me.

Sincerely,
AOAO Ko Olina Fairways



Ralph F. Harris, President

Enclosures:

cc: The Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Land Use Commission, State of Hawaii
235 South Beretania Street, Suite 406
Honolulu, Hawaii 96813

Ko Olina Community Association
Ken Williams, General Manager
1480 Aliinui Drive
Kapolei, Hawaii 96707

Board of Directors
AOAO Ko Olina Fairways
92-1527-H Aliinui Drive
Kapolei, Hawaii 96707-2232

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Helber Hastert & Fee
Planners, Inc.

June 2, 2005

Mr. Ralph F. Harris
President
Ko Olina Fairways Association of Apartment Owners
92-1527-H Aliinui Drive
Kapolei, Hawaii 96707-2232

Dear Mr. Harris:

**Kapolei West Expansion Area
Draft Environmental Impact Statement
Kapolei, 'Ewa District, O'ahu, Hawai'i**

Thank you for your letter to Ms. Donna Goth, President of Aina Nui Corporation, dated May 5, 2005 in response to the Kapolei West Expansion Area Draft Environmental Impact Statement (EIS). This letter is to acknowledge your comments, including a letter dated February 18, 2005 from Ko Olina Fairways and comments from Director Timothy Spillane dated May 5, 2005. We have reviewed your comments and offer the following responses.

1. Kapolei West Plan should complement the Ko Olina Resort

The Kapolei West development is planned to complement the Ko Olina Resort. As shown in the plan, travelers along Aliinui Drive and Kapolei Parkway should not perceive a difference between the two developments. They will be passing through a very similar mix of golf fairway views interspersed with pockets of residential development. Although not yet designed, the proposed Kapolei West golf course plan can accommodate a 7,300 yard (back tees) championship course, complementing the 6,480 yard (back tees) Ko Olina course. The clubhouse grounds and practice tees are dimensioned to accommodate a resort-level of quality.

2. Roadway D intersection with Kapolei Parkway

The plan for the Urbanized Area indicates an intersection with Roadway D and Kapolei Parkway (not Aliinui Drive as indicated in your letter). Roadway D is a collector roadway that provides access to the Petition Area and Farrington Highway. The intersection is planned near the northeast corner of the Fairways community. A proposed mauka/makai greenbelt pathway is proposed along the east boundary of the Fairways complex, providing a buffer from the intersection and makai leg of Road D. As explained at our January 19, 2005 presentation to your Board, the intersection location is constrained on the east side by golf fairway routing which is in turn constrained by the topographic relief of the plateau area. The greenbelt pathway will be landscaped to provide a visual buffer between the homes on the eastern perimeter of the Fairways and the proposed intersection.

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Mr. Ralph F. Harris
June 2, 2005
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3. Proposed Neighborhood Commercial Site

The plan for the Urbanized Area includes a two-acre mixed use area within the northeast quadrant of the Road D/Kapolei Parkway intersection. This is intended to provide a more central location for convenient retail services to nearby communities of Ko Olina, Nanakai Gardens and Honokai Hale. In addition to neighborhood serving retail use, residential use is also envisioned within the parcel. The proposed regional center at the east end of the Kapolei West project area (also within the Urbanized Area) will be automobile/freeway oriented and would not provide the type of convenience envisioned for the smaller neighborhood center.

4. Resort Gate

As noted above, Road D intersects with the planned Kapolei Parkway, not Alinui Drive. There is no gate planned for this location. In addition, the Ewa Regional Transportation Plan, the Ewa Development Plan and State and City development approval conditions (including those for Ko Olina) all identify Kapolei Parkway as a major east-west surface arterial road providing a direct, ungated connection between Kapolei West and the Ko Olina Resort.

5. Road D Traffic Signal

The Kapolei West plan indicates one additional access point to Farrington Highway at the east end of Kamokila Park (referred to as Road D). The Road D connection would be at the planned future location of an intersection with the Makaiwa Hills project located mauka of Farrington Highway.

6. Lost Industrial Jobs

A response to this comment necessitates an overview of the regional job goals as well as the Petitioner's land planning intent.

We regret that the analysis used to evaluate alternatives was mischaracterized as regional job loss. While it identifies potential number of jobs if the alternative use of the land was for industrial development, it was not intended to represent a change in projected regional employment levels. Job creation in the Ewa Development Plan area is essential to establishing a true second city and to the success of the Kapolei West project. DPP estimates that job growth in the Ewa region will increase from about 21,500 in 2000 to over 70,000 by 2030 (a 226% increase). Jobs within the Kapolei region (City of Kapolei, Ko Olina/Kapolei West/Kaleloa/JCIP/ Makaiwa/Makakilo) will increase from about 10,300 in 2000 to over 50,000 by 2030 (a 386% increase). Jobs in the Kaleloa/JCIP area alone (immediately south of the Petition Area) are forecast to increase from about 5,530 in 2000 to over 14,200 by 2030 (a 157% increase) – a net increase of 8,670 jobs.

The job loss referred to in your letter was a worse case scenario based on theoretical zoning densities and intended only for comparison with the proposed use of the area. While it identifies potential number of jobs if the alternative use of the land was for industrial development, it was not intended to represent a change in projected regional employment levels. From a regional

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Mr. Ralph F. Harris
June 2, 2005
Page 3

perspective, the 75.6-acre subject area represents a small portion of the larger 2,300-acre Kalaeloa/JCIP employment area (approximately 3.3 percent) and its removal from industrial use should not limit projected industrial job growth in the area. The alternatives analysis in the Final EIS (Chapter 7) has been revised to emphasize this conclusion.

Given the remaining land to be developed in the City of Kapolei, the undeveloped land east and west of Kalaeloa Boulevard and the intended development of several more hotels in Ko Olina, there is ample opportunity to reach the projected job growth intended for the second city.

From a land planning perspective, the Petitioner believes that the Proposed Action for this area (consisting primarily of parks and golf course fairways), would result in improved land use compatibility (by providing a transitional land use between the residential areas above the OR&L ROW and the Kalaeloa/JCIP industrial area below the OR&L ROW), improve the visual experience of travelers along the Historic Railroad ROW (pedestrians, bicyclists and train riders), provide the opportunity for a championship class golf course (desired to complement the Ko Olina course where the OR&L ROW also bisects the golf course) and provide a more sensitive backdrop to the identified cultural resources in the area south of the OR&L ROW.

7. Mr Spillane's comments (dated May 5, 2005)

A. Cultural and Archaeological Resources

The Draft EIS provides a comprehensive summary of archaeological and cultural resources as well as the full text of the various studies and correspondence with the State Historic Preservation Division. Proposed Plans for preservation and data recovery are presented in Section 4.9.2 of the Draft EIS.

B. Consistency with the Hawaii State Plan

The Draft EIS provides a thorough discussion of how the Proposed Action supports the policies and objectives of the Hawaii State Plan. We disagree with your conclusion to the contrary.

C. Impacts on public facilities, services and infrastructure

The Draft EIS clearly describes the full range of improvements required to support and minimize impacts of the project. To address the reviewer's general concern, the Final EIS has been reformatted, redefining planned improvements and construction procedures as "mitigation." For example, best management practices to reduce soil erosion during the construction period, described in the Draft EIS under Probable Impact, have been moved to a new Mitigation section; water and wastewater system improvements described under Probable Impacts, have been moved to a new Mitigation section, etc. The summary provided in Section 1.3 (Summary of Probable Impacts and Mitigation Measures) has been updated to reflect these changes.

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Planners, Inc.

Mr. Ralph F. Harris
June 2, 2005
Page 4

D. Alternatives

The Draft EIS included an evaluation of a No Action alternative and a Reasonable Alternative (development in accordance with the current Development Plan designation of industrial). The evaluation of the Reasonable Alternative concluded that while industrial development in the area makai of the OR&L ROW is well supported by market demand, the Proposed Action for this area (consisting primarily of parks and golf course fairways), would result in improved land use compatibility as described in our response to Item 6.0.

We appreciate your participation in this review process. Your letter and this response will be included in the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Thomas A. Fee, AICP
President

cc: Donna Goth, Aina Nui Corporation
Bert Saruwatari, Land Use Commission, State of Hawaii
Genevieve Salmonson, Office of Environmental Quality Control

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LAND USE COMMISSION
STATE OF HAWAII

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Ralph F. Harris, President
Board of Directors
Ko Olina Fairways Association of Apartment Owners
92-1527-H Aliinui Drive
Kapolei, Hawaii 96707-2232

Phone: (808) 679-0085
Fax: (808) 679-0086

May 5, 2005

Ms. Donna Goth, President
AINA NUI CORPORATION
1001 Kamokila Boulevard, Suite 255
Kapolei, HI 96707

RE: Review Comments on the Draft Environmental Impact Statement (DEIS)
Dated March 10, 2005
Title of Project: Kapolei West Expansion Area
Location: Oahu, Ewa District
Tax map Key Nos: (1) 9-1-14: portion 33; 9-1-15: portion 4 and portion 20

Dear Ms. Goth:

Thank you for the copy of the Draft Environmental Impact Statement (DEIS) for the Kapolei West project and the subsequent electronic copy of the report on a CD. We appreciate your responsiveness to our request.

This letter is a composite of comments that we received from homeowners at the Ko Olina Fairways and members of our Board of Directors who have taken their time to review the Aina Nui's draft DEIS.

When we wrote you in February 2005 we pointed out that our general understanding is that a Kapolei West Plan should complement the Ko Olina Resort development as conceived in the master planning process. The draft EIS does not acknowledge this concept and we think that is failure to plan a transition of the two developments that works for the community. Our understanding as residents (circa 1995) on this Resort that the Campbell Master Plan and Ewa Master Plan anticipated a second resort quality golf course in the abutting development would compliment the Ko Olina Resort. The Kapolei West plan does not meet a standard to complement a transition from the Resort.

The AOA Ko Olina Fairways strongly opposes three (3) major areas of "close proximity" to the Fairways. Our objections include 1) the proposed roadway plan that results in a four way intersection at Road "D" and Aliinui Drive. The proposed road will run along the eastern boundary of the Ko Olina Resort and Marina property line and that

Ms. Donna Goth, President
AINA NUI CORPORATION
May 5, 2005
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is next to the Ko Olina Fairways. 2) The proposed commercial site at the new intersection would be a disaster for attracting more people to this new focal point and this will threaten the quality of life and security concerns of homeowners. 3) In your Draft EIS the traffic congestion that would occur at the intersection with Aliinui Drive and Road "D" would be further complicated by the Resort gate that will need to be installed and manned 24 hours a day.

These major objections were detailed to Aina Nui Corporation in a letter dated February 18, 2005 letter following Aina Nui's presentation to the Ko Olina Fairways homeowners in January 2005. A copy of that letter is included with this letter as part of our comments on the draft.

Additionally, we were asked by homeowners to include further comments and objections related to roadway "D" because such a roadway, if built, would generate increased noise and dust that will affect the quality of life at the Fairways. We recommended that Aina Nui revisit their plan and move the roadway away from the existing residential at Ko Olina Resort and include a sufficiently landscaped buffer to reduce the impact of vehicles traveling along the road.

We were also ask to comment that you remove the proposed commercial site which makes no sense knowing that Campbell Estate has a new Regional Mall that is approved and coming online before this project. The mall site borders on the eastern boundary of the Kapolei West Plan and therefore additional commercial activities next to existing residential does not make sense! We believe that the location of this commercial parcel is incompatible with your overall Plan.

The addition of traffic signals on Farrington Highway is unclear but noted and there may be a new signal at the location of the intersection of road "D" and Farrington. Farrington has two existing traffic signals fronting Honokai Hale and Nanakai Gardens. The additional signals on the highway will affect traffic flow that is already stressed.

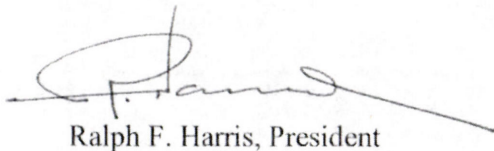
Finally, we attach specific comments from one of our Directors, Mr. Timothy Spillane, that addresses several inconsistencies and omissions in your DEIS. Mr. Spillane's comments are interesting in that he has noted that there are some subtle missing comments in your EIS and some subtle assumptions in your plan.

We did notice that in comparing the changes in your master plan that this project would result in three thousand (3,000) lost industrial jobs compared to alternative uses!

Thank you for including our comments and objections in the review of the Draft EIS. Should you have any questions or comments please contact me.

Ms. Donna Goth, President
AINA NUI CORPORATION
May 5, 2005
Page 3 of 3

Sincerely,
AOAO Ko Olina Fairways



Ralph F. Harris, President

Enclosures: Letter dated February 18, 2005 from Ralph F. Harris, President, Ko Olina
Fairways AOAO to Aina Nui Corporation.
Comments of Director Spillane, AOAO Ko Olina Fairways

cc: The Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Land Use Commission, State of Hawaii
235 South Beretania Street, Suite 406
Honolulu, Hawaii 96813

Helber Hastert & Fee, Planners
Corlyn Olsen Orr, Project Planner
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Ko Olina Community Association
Ken Williams, General Manager
1480 Aliinui Drive
Kapolei, Hawaii 96707

Board of Directors
AOAO Ko Olina Fairways
92-1527-H Aliinui Drive
Kapolei, Hawaii 96707-2232

Comments from Director Spillane (Ko Olina Fairways AOA)

Submitted May 5, 2005

1.3 EIS Summary:

The petition area of 174.2 acres of lands currently zoned as "agricultural". The Aina Nui Corporation (Estate of James Campbell) is petitioning the State of Hawaii, Land Use Commission to reclassify the petition area from an "Agricultural District" to an "Urban District". The petition request is to rezone the area for the purpose of residential development. The intent is to integrate the petition area (174.2 acres) with an adjoining parcel (372.6 acres) of urbanized area to complete an overall development area identified as "Kapolei West", a proposed 546.8 acre master planned urban district, residential and golf community.

Petition Area:

- Residential (1154 homes)
- Park (17.1 acres)
- Golf course

Probable Impacts:**Physical Environment:**

No adverse impacts on climate, soils, botanical, groundwater, historic, cultural, archeological, scenic, or visual resources, or air quality or noise. Cultural and archeological resources have been studied, and several important sites have been identified for preservation or data recovery.

The proposed plans for the preservation and/or data recovery for the Cultural and Archeological resources studied and identified in this EIS need to be further identified and expanded upon.

Socio-Economic Environment:

The Draft EIS proposes that the action would have the following beneficial impacts on:

- (1) Housing, employment and fiscal resources.
- (2) Slightly offsetting the large projected shortfall of primary housing units.
- (3) The fact that the Development phase – could support an average of 390 direct, indirect and induced jobs per year.
- (4) That with completion in 2020 – could support 260 operational period jobs per year.
- (5) Positive state and county government revenue/expenditure ratios yields

- Section 226-106 Affordable Housing, section 226-106(8), Give higher priority to the provision of quality housing that is affordable for Hawaii residents and less to development of housing intended primarily for individuals outside of Hawaii. 420 in-migrants (380 new to the state, 40 presumed to relocate from elsewhere in the state).

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*- **Homeownership, Policy A (2)** Encourage increased private sector participation in the development of affordable housing units. **Policy A (3)** Ensure that (1) housing projects and (2) projects which impact housing provide a fair share/adequate amount of affordable homeownership opportunities.*

Not a single negative impact is identified???

Development phase economic increase in employment should not be a major consideration in regards to the Hawaii State Plan.

Increases in state and county government revenue due to residential development have never reflected a significant gain in revenue due to the increased expenditures to support the development (infrastructure, infrastructure maintenance, schools, parks etc. after initial developer contributions)

The proposed beneficial impact on housing is based on a quoted 420 in-migrants (380 new to the state, 40 presumed to relocate from elsewhere in the state). It is fairly obvious that the real benefits will be exclusively developer orientated. These benefits would include offerings of additional housing units, advertised, marketed and sold, claiming the accolades of the adjacent Ko Olina Resort facilities, amenities and services, as well as the proposed Kapolei West Golf Course (with housing prices below established Ko Olina Resort properties but still high in regards to HRS Section 226-106 Affordable Housing, section 226-106(8). Future owners will consist of vacation/investment property owners as opposed to the targets referenced throughout the document stressing the "Hawaii State Plan" prerequisites as noted above.

The majority of the Kapolei West housing market would be based on vacation/investment property owners attempting to purchase property with the expectation of the availability of the adjacent Ko Olina Resort facilities.

The interpretation of the Campbell Estate as being a "private sector entity" participating in the development of affordable housing units is highly questionable.

None of the identified Hawaii State Plan milestone prerequisites would be accomplished.

Public Facilities and Services:

The proposed Action would not have a significant direct or indirect impact on public transportation systems if the proposed traffic mitigation measures are implemented. The Proposed Action would not have an adverse impact on utilities and public infrastructure systems (water supply, wastewater, drainage, solid waste, power and communications)

*- **State Transportation Functional Plan:***

*- **Policy I.A.1** Increase transportation capacity and modernize transportation infrastructure in accordance with existing master plans and laws requiring accessibility for people with disabilities.*

- Policy I.B.1 Close the gap between where people live and work through decentralization, mixed zoning and related initiatives.

- Action I.B.1.a Promote the development of the 'Ewa Second City to provide jobs near homes. Promote the development of jobs near homes.

Any development of this significance will most certainly adversely impact Public facilities, services and infrastructure. The mere comment in an EIS that this will not present any adverse impact is in itself disturbing. It portrays an aggressive, "answer issues away" thought process designed specifically to suffice the reader/reviewer and move forward with the petitioner's request. An EIS does not have the answers to all, nor should the author convey that it does.

The proposed mitigation projects identified in the EIS addressing the increased transportation capacity and transportation infrastructure may alleviate some of the Kapolei "city proper" transportation issues, but does not offer any resolution/mitigation with respect to the Ko Olina Resort and H-1 increased load use (During construction phase and, or upon completion). The "Ewa Second City Concept", under the guise and interdisciplinary guidance of the Campbell Estate and its affiliates has not made significant strides in regards to the State Transportation Functional Plan (see above). The Ewa Plain has been largely developed as a residential community with few significant economic employment stimuli. Current and proposed employment opportunities in both Kapolei and in the proposed Kapolei West Expansion Area are limited to retail, sales, services, restaurant and general labor. The projected ratio of homeowner expenditures and local employment income within this labor market is not conducive to support potential Kapolei West homeowners (homeowners who work and live in the Kapolei/Proposed Kapolei West areas).

The majority of homeowners in the Ewa Plain developed communities are still earning their incomes between Pearl City and Waikiki, and are dependant on the H-1 transportation corridor on a daily basis. This load capacity on the H-1 increases quarterly in proportion with the increases in Leeward Oahu housing developments. The Kapolei West Project is but one of several.

None of the identified Hawaii State Plan milestone prerequisites would be accomplished.

1.4 Alternatives Considered:

- No Action
- 'Ewa Development Plan Alternative

This is very anemic Alternatives Consideration area. "No Action" is an EIS default and the "Ewa Development Plan Alternative" is a "broad-brushed" placeholder. No Alternatives are offered depicting:

- A middle ground development plan offering concessions (half housing density with golf course/without golf course, full proposed housing density without golf course)?
- No Action with the benefits of open undeveloped space providing a buffer between communities?

- An urban buffer providing relief space between the Ko Olina Resort Property and Kapolei Town Proper to enhance the resort's ambiance as a "resort" and not another Kapolei neighborhood? Undeveloped space can be beneficial.

An EIS should be objective, and not gravitate in support of a specific stance in the proposal. This EIS indicates considerable bias towards the petitioner, and suggests easy resolutions to any impacts (never adverse impacts) which could possibly result. It proposes no alternatives other than the proposed action. It identifies that the proposed action is the only logical alternative. The only logical alternative because it best utilizes the action area to best benefit the State of Hawaii, the City and County of Honolulu, the proposed "2nd City of Kapolei", Honokai Hale, the KoOlina Resort Complex, Makakilo and everything in between. It conveniently does not mention the benefits afforded (with approval of the proposed action and the Kapolei West Development as a whole) to the Estate of James Campbell, the petitioner.

No proposed endeavor of this magnitude is easy, or without adverse consequences to the environment or to those affected in the immediate vicinity of the proposed action. Thank you for the opportunity to comment on this EIS. Mahalo.

Timothy Spillane
92-1507 Aliinui Drive #18H
Kapolei, Hawaii 96707



ORIGINAL

October 19, 2005

LAND USE COMMISSION
STATE OF HAWAII
2005 OCT 19 P 2:30

Randall F. Sakumoto, Esq.
Chairman
Hawaii State Land Use Commission
235 So. Beretania Street
Honolulu, Hawaii 96813

Re: State Land Use Commission Application for Urbanization for Kapolei West A04-753

Dear Commissioners:

Thank you for this opportunity to present comments to the State Land Use Commission Application for Aina Nui Corporation A04-753 (the "Application"), seeking the urbanization of a portion of the areas commonly known as Kapolei West. The Ko Olina Community Association is the master association for the Ko Olina Resort & Marina, which sits directly adjacent to the proposed development. Members within our Association include all property owners in the Resort, including: Marriott Hotels (operating the J.W. Marriott Ihilani Resort), Massachusetts Mutual (owner of the Ihilani Resort), Marriott Vacation Club International (owner and operator of the Ko Olina Beach Club timeshare), Almar Inc. (operators of the Ko Olina Marina), Ko Olina Golf Club, many other landowners, as well as all of the individual residential owners at Ko Olina. We thank you for the opportunity to comment on the Application, and hope that you will appreciate the significant impact the proposed development and the urbanization under the land uses and land plan proposed in the Application will affect not only the Resort, but more importantly, the West Oahu region.

Please recognize that we are not opposed to the development or the urbanization of Kapolei West. Instead, we strongly advocate for the proper and appropriate development of this area. With today's real estate market, it is almost too easy to build and sell residential projects. In planning our region's future, we must insure that we examine the long term effects of the proposed developments, and insure that we are not unduly swayed by today's market and short term benefits. While we understand that there are different opinions of what is the proper development of Kapolei West, there are some key factors in the planning of this development that must be addressed in all aspects of this development. These are the concerns that we raise in these comments. We further note that these comments have previously been shared with the Applicant and we have provided the Applicant with proposals that would address these regional issues.

We also hope that you will appreciate the importance of this development area. The development of Kapolei as a true second city is of significant importance to the success and future of West Oahu. Kapolei must serve as an economic center for Oahu and not serve merely as another bedroom community. Similarly, Ko Olina was planned as an economic engine for West Oahu – bringing jobs and a unique segment of the visitor industry. Kapolei West, sitting between



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downtown Kapolei and Ko Olina, will serve as a key transition development between the economic centers. Thus, the appropriate development of this section is a key element to West Oahu's future. With that preface, we offer the following comments for your consideration in addressing the Application:

1. **Loss of Regional Jobs and Industrial Lands:** Based on the elimination of planned industrial lands on the makai portion of the Project adjacent to the railway, and its conversion to golf course/buffer area, the proposed development will cause the loss of 2,900 jobs to the region. In the growing West Oahu, jobs serve three key purposes (i) the development of the Kapolei region as a second city and a cure for the historical unemployment problems of the region; (ii) alleviating commuter traffic problems by providing a counter flow or non-flow of traffic on H-1; and (iii) creating a lifestyle to allow residents to live, work and play in the same community. Job creation within the region remains a key element of the planned development of Kapolei as a second city, and was the basis for the development of residential product around the City of Kapolei. The loss of 2,900 jobs is significant and, while the Applicant argues that this will help ease traffic concerns in the immediate area and that these jobs will be replaced by other industrial lands, it (x) fails to address how the loss of these jobs will affect overall commuter traffic, as fewer area residents will be able to live and work in the same area; (y) fails to address how this job loss affects the development of the Kapolei region; and (z) fails to recognize that there is no new, replacement industrial area – this will be a net loss of jobs, which we cannot afford. The loss of 2,900 jobs is not a positive impact, as the Applicant attempts to summarily imply. Therefore, to urbanize this area without requiring the replacement of the industrial lands and jobs provided for in the Region's Development Plan would not be appropriate for the West Oahu region.
2. **Residential Development along Industrial Harbor:** The proposed residential development at the furthest makai portion of the development is inappropriate. Like the removal of industrial lands, in the Regional Development Plan this area is planned for commercial development. To take lands planned for development with jobs for the region and turn it into residential development is inappropriate. Additionally, locating residential product directly adjacent to an operating industrial harbor will likely create long term difficulties for the industrial operations planned for the harbor. People living along the harbor may bar certain activities that should be occurring in the harbor for the good of the region. This may include evening and late night activities, hazardous material transportation, and other noise related activities. Again, to urbanize this area with such a significant change of development plans does not make sense until the long term effects have been fully considered and discussed publicly with the appropriate harbor users and administrators.



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3. **Stacking of Residential Projects:** While outside of the area seeking urbanization, the proposed residential development plan for the mauka/Waianae portion Kapolei West is inappropriate. The proposal seeks to wedge additional residential between Honokai Hale and Ko Olina Hillside residential communities. The current Regional Development Plan calls for golf to be developed within this strip of land. This would provide a buffer for the area, so that we do not create a gigantic stacking of residential projects running from Farrington Highway to the ocean. Furthermore, because there are no roads planned to connect the communities, such a stacking would create the kinds of problems that have been made evident through the “smart growth” concepts that the City has been implementing. So, while this area is outside of the application area, because the golf course area has been redistributed throughout Kapolei West (including the replacement of industrial lands discussed above), this must be considered in the urbanization application
4. **Transportation:** Transportation issues for any West Oahu development are important, and the Application raised significant traffic and transportation issues which must be addressed before the lands are urbanized for the development.
 - a. **Regional Traffic Impacts:** While the Application discusses traffic impacts in the immediate vicinity of the project site, there is insufficient discussion of the larger regional context. The Application fails to address the new population’s impact on regional bottlenecks areas along H-1. It must address regional transportation issues and identify planned improvements that would adequately alleviate regional traffic congestion.
 - b. **Industrial Traffic through Residential and Resort Areas:** The proposed traffic flow would run traffic out of the Campbell Industrial Park and Campbell Business Park directly through the residential developments of the project and encourage such traffic to continue through the region’s resort development. This is a significant impact and is inappropriate. There is no showing that additional access routes for the industrial development at Campbell Industrial Park are needed. Without such a need, such traffic should not be allowed to traverse residential and resort areas.



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Thank you for the opportunity to provide these comments. Again, we stress that we are not opposed to the development of Kapolei West. Instead, we strongly advocate the appropriate development of this area – fully considering the true impacts of the developments proposed as part of the Application. Finally, for the record, we would like to incorporate our written comments to the Draft EIS, which we submitted to you on May 6, 2005, as a part of our comments to the Application. We look forward to your decision and thank you for considering these concerns and issues.

Sincerely,

Ko Olina Community Association
By: Kenneth Williams
Its: Vice President

KW:vlb
Attachment

ORIGINAL



May 6, 2005

LAND USE COMMISSION
STATE OF HAWAII
2005 OCT 19 P 2:30

Ms. Donna Goth, President
Aina Nui Corporation
1001 Kamokila Boulevard, Suite 255
Kapolei, Hawaii 96707

Re: Review Comments on the Draft Environmental Impact Statement (DEIS)
Dated March 10, 2005
Title of Project: Kapolei West Expansion Area
Location: Oahu, Ewa District

Dear Ms. Goth:

Thank you for this opportunity to present comments to the Draft Environmental Impact Statement for Kapolei West (the "EIS"). The Ko Olina Community Association is the master association for the Ko Olina Resort & Marina, which sits directly adjacent to the proposed development. Members within our Association include Marriott Hotels (operating the J.W. Marriott Ihilani Resort), Massachusetts Mutual (owner of the Ihilani Resort), Marriott Vacation Club International (owner and operator of the Ko Olina Beach Club timeshare), Almar Inc. (operators of the Ko Olina Marina), Ko Olina Golf Club, many other landowners, as well as all of the individual residents within the resort residential projects at Ko Olina. With that background, our comments are as follows:

1. **General Failure to Adequately Address Impacts:** As a general comment, many sections assessing impacts indicates "no mitigation required", as if the project is not responsible for addressing any impacts. Mitigation measures should discuss planned implementation of specific improvements required to adequately serve existing and projected developments. Additionally, as discussed in detail below, many matters raised in the EIS fail to address the environmental, social and economical impact of the proposed project on the region surrounding the project – including the Kapolei area and entire West Oahu region. It is difficult to assess the true impact of the proposed project without this information. Related to this issue is the lack of a sufficient analysis of alternatives to the proposed Project. There are alternatives that would address the issues raised below which must be examined in evaluating the impacts of the proposed project. In fact, the alternative of following the existing Development Plan is not adequately examined in the EIS.



2. Regional Jobs: Based on the elimination of planned industrial lands on the makai portion of the Project, and its conversion to golf course/buffer area, the EIS states that there will be a loss of 2,900 jobs to the region. In the growing West Oahu, jobs serve three key purposes (i) the development of the Kapolei region as a second city and cure the historical unemployment problems of the region; (ii) alleviating commuter traffic problems by providing a counterflow or non-flow of traffic on H-1; and (iii) creating a lifestyle to allow residents to live, work and play in the same community. Job creation within the region remains a key element of the planned development of Kapolei as a second city, and was the basis for the development of residential product around the City of Kapolei. The loss of 2,900 jobs is significant and, while the EIS argues that this will help ease traffic concerns in the immediate area, it (i) fails to address how the loss of these jobs will affect overall commuter traffic, as fewer area residents will be able to live and work in the same area; and (ii) fails to address how this job loss affects the development of the Kapolei region – in fact, the employment section of the EIS does not even address this proposed loss of 2,900 jobs. The loss of 2,900 jobs is not a positive impact, as the employment section attempts to summarily imply.
3. Residential Development: Analyzing the impacts of the proposed development must be couched within the overall plans to develop Kapolei and West Oahu. Importantly for Kapolei West is the need to understand that this development was originally planned to be phase II of Ko Olina Resort. This is significant because, as is evidenced by today's residential market developed within Ko Olina, resort residential developments, cause significantly less impact on infrastructure (including traffic, schools, etc.). Because the project is no longer being proposed as a part of the Ko Olina Resort, it is likely that its impacts on infrastructure will be greater than the alternative of developing Kapolei West as a second phase of Ko Olina Resort.
4. Scenic and Visual Resources: Statements in the EIS that views would not be obstructed should be further documented by visual aids, including views from Farrington Highway/H-1 and the existing developments of Ko Olina and Honokai Hale,. Given the changes proposed from the original master plan of the area, this information must be presented in this EIS. Without such information, it is impossible to adequately evaluate the impacts of the proposed project.
5. Transportation: Transportation issues for any West Oahu development are important, and the EIS fails to adequately address these concerns:
 - a. Regional Traffic Impacts: While the EIS discusses traffic impacts in the immediate vicinity of the project site, there is insufficient discussion of the larger regional context. The EIS fails to address the new population's impact on regional bottlenecks areas along H-1. The EIS must address



regional transportation issues and identify planned improvements that would adequately alleviate regional traffic congestion.

- b. Reliance on Possible Improvements: The EIS inappropriately relies on *possible* future roadway and traffic improvements. The EIS must more clearly state what improvements are assumed to be provided by the State or others and what the project will be funding. Without this information, it is not possible to evaluate the true impact of the proposed project.
 - c. Traffic Flow Assumptions: The traffic study projects a 50-50 split in traffic entering and exiting Kapolei West which does not seem to be plausible. The assumptions and rationale for this should be more clearly provided.
 - d. Industrial Traffic through Residential and Resort Areas: The proposed traffic flow would run traffic from Campbell Industrial Park and Campbell Business Park directly through the residential developments of the project and may encourage such traffic to continue through the region's resort development. This is a significant impact that must be examined and alternatives considered.
6. Schools: The Department of Education's plans to address projected overcrowding of schools in 2009, as shown in Table 21, are discussed in the EIS but there is no assurance that these plans will be completed by the time the proposed project is implemented. In fact, Kapolei High School is already over capacity. Commitments to participate in fair-share contribution programs and dedication of a middle school site are conceptually appropriate but do not assure impact mitigation.
7. Drainage: Given the size of the project area and the changes from the original regional master plan, a drainage plan should be presented to address how storm runoff will be accommodated to prevent off-site and down-gradient impacts.
8. Water Supply: A more specific plan for water system facilities should be presented in the EIS to determine what off-site improvements will be needed. The use of non-potable water should include a discussion of the impacts on the sustainable yield of the underlying caprock aquifer. Additionally, the EIS fails to address the need to require that non-potable water be used for landscaping within the project, especially for the multi-family developments – and not just the parks and golf course, as proposed in the EIS.



Thank you for the opportunity to provide these comments. We look forward to a response and to the EIS addressing these concerns and issues.

Sincerely,

Ko Olina Community Association
By: Kenneth Williams
Its: Vice President

c: The Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Land Use Commission, State of Hawaii
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