

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

7.4 PROBABLE ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

The environmental impacts anticipated to result from development of the Ho'opili project are typical of any large-scale development and have been discussed throughout this EIS. Although uses of the Petition Area and adjacent properties, in the past and present, have significantly altered the natural landscape, under the current proposal (a mixed use community), the existing landscape will be transformed to urban development.

Construction-related Impacts. Potential environmental impacts (i.e., noise, soil erosion, fugitive dust and exhaust emissions, and temporary traffic disruption) will primarily occur during the construction period (to occur in various parts of the Petition Area through 2030). All construction activities will occur during daylight hours and will comply with DOH noise regulations to minimize increases in noise levels. During construction, the Petition Area may be subject to potential soil erosion and fugitive dust; as such, all construction activities will comply with State DOH regulations, and after construction, soil erosion will likely be reduced compared to current conditions (cultivation).

Infrastructure Impacts. Solid waste, wastewater and additional stormwater runoff will be generated on-site, and energy and water will be consumed for operation of the proposed Ho'opili project. Since many of the new residents of the Ho'opili project already reside on O'ahu, they are already generating solid waste, wastewater and stormwater runoff as well as consuming electricity and water. These impacts are typical of urban development and will be mitigated at Ho'opili through site design, the proper selection and installation of fixtures and appliances, and management practices. Major on-site and off-site infrastructure improvements proposed as part of the proposed project include the installation of new safe drinking and non-potable water systems (including storage and transmission), wastewater collection systems, major drainage improvements, on- and off-site transportation facility improvements (including roads and pedestrian/bicycle paths), electrical/communication infrastructure (including those that harness renewable sources), and designs and practices than facilitate recycling.

Visual Impacts. The appearance of and the views through the Petition Area will significantly change as agriculture-related structures and vegetation are replaced by urban structures and trees. However, the project site and area are relatively flat, providing no shoreline views. Views from future internal roadways will be given consideration to the extent possible, and extensive landscaping and appropriate architectural design will mitigate the visual appearance of the developed areas.

Faunal Impacts. The number of some introduced birds will likely increase, while the number of introduced birds that prefer open grasslands and agricultural fields will likely decrease. No native, threatened, or endangered species have been observed, and as such, none are expected to be impacted by the proposed project.

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

Agricultural Impacts. Some of the public currently benefits from employment and income generated through short-term revocable agricultural leases on portions of the Petition Area. These cultivated lands will gradually be withdrawn from agricultural production for the development of the Ho'opili community; however, there is an ample supply of land suitable for diversified agriculture on O'ahu and the State of Hawai'i. The proposed project is located within the Urban Growth Boundary delineated in the *Ewa Development Plan* and planned for urban development, not agricultural production.

Traffic Impacts. The Petitioner acknowledges that the traveling time for residents in the 'Ewa (and Wai'anae and Central O'ahu) regions commuting to jobs and/or schools in the Primary Urban Center as one of the most serious issues facing O'ahu today. This has been recognized by various State and County agencies including the O'ahu Metropolitan Planning Organization (OMPO), the State Department of Transportation (DOT), the City and County of Honolulu Department of Transportation Services (DTS) and the City County of Honolulu Department of Planning and Permitting, Traffic Review Branch (DPP TRB), and is being addressed through the Statewide Transportation Improvement Program (STIP) process, State and County Capital Improvements Program (CIP), the Ewa Impact Fee, private developers and the City's Honolulu High-Capacity Transit Corridor (HHCTC) project.

The proposed Ho'opili project involves development of a mixed-use community on approximately 1,555 acres in 'Ewa. The Conceptual Land Use Plan reflects the desire for a community that is "complete" with: affordable living options; employment centers; quality schools; shopping, gathering and recreational places; and parks and open space for residents. Implementation of the Plan will allow residents the ability to live, work, learn, play, and shop within Ho'opili without needing to use personal motorized vehicles on regional roadways.

Ho'opili will be connected to the surrounding 'Ewa District (and neighboring Department of Hawaiian Home Lands (DHHL), the University of Hawai'i at West O'ahu (UHWO) and the Hawaii Community Development Authority (HCDA) properties by an internal network of closely-spaced gridded streets and bicycle paths which allow a variety of circulation options for residents and visitors. Wider tree-lined boulevards will create a distinct axis running north-south and diagonally east-west across the site, but unlike a conventional subdivision of cul-de-sacs, there will many more streets, sized at a walking scale. Ho'opili is being designed to be transit-ready, and the land use plan, while subject to change, has been designed to accommodate a high-capacity transit corridor either along Farrington Highway or diagonally through the project site, with either one or two transit station locations. While the proposed residential unit count will not change, the land use plan will need to be adjusted depending on the final alignment of the high-capacity transit corridor, as the potential for noise impact from an elevated high-capacity transit alignment would likely require taller, higher density residential or industrial uses along the alignment. The final siting of the transit station location(s) will also provide transit-oriented development potentials, which will also cause the plan to be refined, as higher

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

intensity development (and density) will be concentrated around the transit station(s). Also possible is a transit maintenance and storage facility.

There are several major transportation projects that have been long-planned for East Kapolei. The Ho'opili project has been planned assuming that certain planned transportation projects will be constructed including a portion of North-South Road between Farrington Highway and Kapolei Parkway; a portion of the North-South Road/H-1 Freeway interchange; a portion of the North-South Road/Farrington Highway; the long-planned widening of Farrington Highway fronting Ho'opili; the proposed East-West Connector Road through the Petition Area; and the segment of the proposed Honolulu High-Capacity Transit Corridor (HHCTC) project through the Petition Area.

The proposed project has been designed to reduce future residents' reliance on private motorized vehicles through the following measures:

- Ho'opili is the first new project designed to ~~embrace~~ support high-capacity transit (elevated, fixed-guideway) corridor and station(s) (and a possible transit maintenance and storage facility);
- the Petition Area is large enough to be designed and offer a full range of mixed land uses, including a wide range of places of live, work, shop, recreate and learn and will aspire to achieve a job-housing balance;
- Ho'opili is designed to maximize connectivity (transit, pedestrian, bicycle and vehicular) with surrounding streets and communities (including DHHL and UHWO), while minimizing cul-de-sacs and dead-end streets;
- Ho'opili will be designed to take advantage of the relatively flatness of the site and proximity to UHWO by designing streets and grade-separated multi-modal pathways for walking and bicycling; and
- the Petitioner will seek to implement other transportation management and transportation demand management (TDM) strategies (such as requesting that the State/County consider extending or instituting contra-flow of major transportation corridors during a.m. and p.m. peak travel times).

The most important TDM strategy is that Ho'opili is designed to ~~embrace~~ support both rail and bus transit and the project is proposed to have mixed uses over most of the entire Petition Area.

7.5 RATIONALE FOR PROCEEDING WITH THE PROJECT NOTWITHSTANDING UNAVOIDABLE EFFECTS

As noted in Sections 2.1.6 and 5.3.2 of this EIS, the proposed Ho'opili project complies with the *Ewa Development Plan* and is the rationale for proceeding notwithstanding any unavoidable negative effects.

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

7.6 UNRESOLVED ISSUES

Unresolved issues are regularly associated with projects in the planning and preliminary design phases. This chapter, in compliance with Section 11-200-17(n), HAR, describes the unresolved issues associated with development of the proposed project. Discussion of how such issues will be resolved and what overriding reasons exist for proceeding with the project are listed below.

Honolulu High-Capacity Transit Corridor (HHCTC) Alignment Through Ho'opili. As of this writing, the high-capacity transit corridor alignment through Ho'opili has not been finalized. As previously noted, Ho'opili is being designed to be transit-ready, and the land use plan, while subject to change, has been designed to accommodate a high-capacity transit corridor either along Farrington Highway or diagonally through the project site, with either one or two transit station locations. While the proposed residential unit count will not change, the land use plan will need to be adjusted depending on the final alignment of the high-capacity transit corridor, as the potential for noise impact from an elevated high-capacity transit alignment would likely require taller, higher density residential or industrial uses along the alignment. The final siting of the transit station location(s) will also provide transit-oriented development potentials, which will also cause the plan to be refined, as higher intensity development (and density) will probably be concentrated around the transit station(s). Also unresolved at this time is the location of a possible transit maintenance and storage facility.

State of Hawaii Department of Education (State DOE) School Fair Share Requirements.

The Petitioner is currently coordinating with the State DOE regarding the number of schools that will be required for the development of the Ho'opili project. This will be identified as an unresolved issue until the number of schools required is finalized during the EIS process.

Drainage. The Petition Area falls within three different drainage basins. For the portion of the Petition Area within the West Loch drainage basin, it is planned to collect all storm water and route it to an existing detention basin located on the east side of Fort Weaver Road and south of the OR&L railroad tracks. The basin would be expanded to ensure that the water quality storage component of the City and County of Honolulu Standards was achieved. An overflow from the detention basin would discharge to the West Loch of Pearl Harbor. The overflow from the proposed makai detention basin would have to cross Navy property. Permission of the Navy would be required. The concept of the overflow across Navy property is not new and was approved in concept back in the early- to mid-1990's. However, as of this date, the Navy has rejected any considerations to allow increased runoff to cross Navy land. Permission from the Navy needs to be resolved for the overflow option to move forward, otherwise the detention basin will need to be expanded to retain the runoff.

8.0

Consultation



HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

8.0 CONSULTATION

The EIS process and planning of Ho'opili involved communicating with Federal, State, and County agencies, and individuals, private companies, and community organizations, including those listed below.

Federal:

- Army Corps of Engineers
- Navy

State of Hawai'i:

- Governor
- Department of Education
- Department of Hawaiian Home Lands
- Department of Health
- Department of Land and Natural Resource
- Department of Transportation
- Hawaii Community Development Authority
- Land Use Commission
- Office of Planning
- University of Hawai'i – West O'ahu

City and County of Honolulu:

- Mayor
- Board of Water Supply
- Department of Emergency Services
- Department of Environmental Services, Wastewater Management Division
- Department of Planning and Permitting
- Department of Transportation Services

Other Agencies and Individuals:

- Maureen Andrade, Village Park Community Association
- Todd Apo, City Councilmember
- Gary Bautista, 'Ewa Neighborhood Board
- Dick Beamer, Retired Army/Honorary Mayor of 'Ewa Beach
- Scott Belford, HOSEFF Non-Profit
- Darrlyn Bunda, Committee for Balanced Transportation
- Rida Cabanilla, State Representative
- John Condello, Hawai'i Theological Institute
- Charles Djou, City Councilmember
- BJ Dorman, Salvation Army Hawai'i
- Everett Dowling, The Dowling Company

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

- Will Espero, State Senator
- Kurt Fevella, 'Ewa Neighborhood Board
- John Field, Punahou School
- Mike Fitzgerald, Enterprise Honolulu
- Pearlyn Fukuba, HCDA/Kalaeloa
- Mike Gabbard, State Senator
- Nestor Garcia, City Councilmember
- Frank Genadio, Makakilo Resident, Committee for Balanced Transportation
- Kevin Gilbert, Hawai'i Theological Institute
- Carolyn Golojuch, Makakilo Resident
- Michael Golojuch, Palehua Community Association
- Scotty Gomes, Fellowship of Catholic Men
- Donna Goth, Aina Nui Corporation
- Sharon Har, State Representative
- Teri Ikehara, West Loch Estates President
- Dr. Val Iwashita, 'Iolani School
- Larry G. Jefts, Sugarland Farms
- Brian Kanno, Former State Legislator
- Guy Kidder, Fellowship of Catholic Men
- Walter Kirimitsu, Saint Louis School
- Coby Lynn, 'Ewa Beach Lion Club
- Eileen Lynn, 'Ewa Beach Resident
- Tesha Malama, 'Ewa Beach Resident
- Stephen Meder, UH Center for Smart Building and Community Design
- Dr. Mark Mitchell, Kahi Mohala
- Scott Mitchell, Fellowship of Catholic Men
- Mark Moses, Former State Legislator
- Richard Oshiro, Waipahu Neighborhood Board
- Kimberly Pine, State Representative
- Rodolfo Ramos, 'Ewa Task Force
- Peter Rappa, UH Sea Grant Extension Service
- Frances Rivero, 'Ewa Beach Boys and Girls Club
- Ross Rolirad, Rotary Club
- Lou Salza, ASSETS School
- Dr. James Scott, Punahou School
- Alec Sou, Aloun Farm, Inc.
- Chuck Sted, Hawaii Pacific Health
- Georgette Stevens, West O'ahu Economic Development Association
- Summer Thomson, 'Ewa Beach Boys and Girls Club
- Keith Timson, Makakilo Resident
- Maeda Timson, Kapolei Neighborhood Board
- David Arakawa, Land Use Research Foundation
- Karen Wenke, 'Ewa Resident, 'Ewa Lions, Small Business Person
- Chuck Wheatley, Guardian Angels/Waipahu

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

- Daniel White, Island Pacific Academy
- Lance Widner, Royal Kunia Community Association
- Stephanie Widner, Royal Kunia Resident
- George Yakowenko, Waipahu Neighborhood Board
- Annette Yamaguchi, Waipahu Business Association
- Linda Young, Kapolei Neighborhood Board, Malanai Iki Association

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

(This page intentionally left blank.)

9.0

List of Preparers



HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

9.0 LIST OF PREPARERS

This EIS was prepared by PBR HAWAII, 1001 Bishop Street, ASB Tower, Suite 650, Honolulu, Hawai'i 96813. Key technical consultants involved in the preparation of this project and their company affiliations and specialties are listed below:

Firm

Decision Analysts Hawaii, Inc.

B.D. Neal & Associates

Cultural Surveys Hawai'i Inc.

Cultural Surveys Hawai'i Inc.

Rana Productions, Ltd.

LeGrande Biological Surveys Inc.

Mikiko Corporation

Mikiko Corporation

D.L. Adams Associates, Ltd.

Tom Nance Water Resource

Bills Engineering Inc.

Bills Engineering Inc.

MK Engineers, Ltd.

Belt Collins Hawaii Ltd.

Wilbur Smith Associates

Bryant Brothers

Pacific Analytics, L.L.C.

Area of Expertise

Agricultural Impact Analysis

Air Quality Study

Archaeological Inventory Survey

Cultural Impact Assessment

Faunal Survey

Flora Survey

Fiscal Impact Study

Market Study

Acoustical Study

Conceptual Water Master Plan Engineering

Preliminary Wastewater Collection System Master Plan

Drainage Master Plan

Preliminary Electrical and Communications Master Plan

Social Impact Assessment

Traffic Impact Analysis Report

Traffic Impact Analysis Report

Arthropod Survey and Assessment

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

(This page intentionally left blank.)

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

10.0 GLOSSARY

The following is a list of terms, abbreviations, and acronyms used in the EIS.

A

AAQS	Ambient Air Quality Standards
ADA	Americans with Disabilities Act
ALISH	Agricultural Lands of Importance to the State of Hawaii

B

BOE	State of Hawai'i Board of Education
BWS	City and County of Honolulu Board of Water Supply

C

CFS	Cubic Feet per Second
CIP	Capital Improvement Project
City	City and County of Honolulu
CSH	Cultural Surveys Hawaii, Inc.
CZM	State of Hawai'i Coastal Zone Management Program

D

dBa	A-weighted decibel
DBED&T	State of Hawai'i Department of Business, Economic Development & Tourism
DDC	City and County of Honolulu Department of Design and Construction
<u>DES</u>	<u>City and County of Honolulu Department of Environmental Services</u>
DHHL	State of Hawai'i Department of Hawaiian Home Lands
DOE	State of Hawai'i Department of Education
DOH	State of Hawai'i Department of Health
DOT	State of Hawai'i Department of Transportation
DP	Development Plan
DPA	Development Plan Area
DPR	City and County of Honolulu Department of Parks and Recreation
DPP	City and County of Honolulu Department of Planning and Permitting
DPP TRB	City and County of Honolulu Department of Planning and Permitting, Traffic Review Branch
DTS	City and County of Honolulu Department of Transportation Services

E

EIS	Environmental Impact Statement
EISPN	Environmental Impact Statement Preparation Notice
EMF	Electro Magnetic Fields
EMS	Emergency Medical Services
Ewa DP	Ewa Development Plan

HO'OPII

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

Ewa DPA	Ewa Development Plan Area
F	
F	Fahrenheit
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTE	Full-Time Equivalent
G	
GM	Gallons per Minute
H	
HAR	Hawaii Administrative Rules
HCDCH	State of Hawai'i Housing and Community Development Corporation of Hawaii
HCS	Highway Capacity Software
HECO	Hawaiian Electric Company, Inc.
HFD	City and County of Honolulu Fire Department
HHCTC	Honolulu High-Capacity Transit Corridor Project
HOV	High-Occupancy Vehicle
HPD	City and County of Honolulu Police Department
HRS	Hawaii Revised Statutes
H-1	H-1 Freeway
H-2	H-2 Freeway
J	
<u>JDA</u>	<u>Joint Development Agreement</u>
K	
<u>KCDD</u>	<u>Kalaeloa Community Development District</u>
kV	Kilo-Volt <u>Kilovolt</u>
L	
LCA	Land Court Award
Ldn	Day-night equivalent sound level measured in dBA
LOS	Level of Service
LOTMA	Leeward Oahu Transportation Management Association
LPA	Locally Preferred Alternative
LSB	Land Study Bureau
LUC	State of Hawai'i Land Use Commission
LUO	City and County of Honolulu Land Use Ordinance
M	
MG	Million Gallons
MGD	Million Gallons per Day
MOS	Minimum Operable Segment
MSL	Mean Sea Level
MSW	Municipal Solid Waste
MVA	Megavolt Amperes
MW	Gross Megawatts

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

N

NAS Naval Air Station
NPDES National Pollutant Discharge Elimination System

O

OEQC State of Hawai'i Office of Environmental Quality Control
OMPO Oahu Metropolitan Planning Organization
OR&L Oahu Railway & Land
ORTP Oahu Regional Transportation Plan
OSCo Oahu Sugar Company, Ltd.

P

PSI Per Square Inch

R

ROW Right-of-Way

S

SHPD State of Hawai'i Department of Land and Natural Resources
Historic Preservation Division
SMA Special Management Area
SOBA Southern O'ahu Basal Aquifer
State State of Hawai'i
STIP Statewide Transportation Improvement Program

T

TDM Travel Demand Management
TIAR Traffic Impact Analysis Report
TMK Tax Map Key
TWSC Two-Way Stop-Controlled

U

UHWO University of Hawai'i – West O'ahu
UIC Underground Injection Control
USDA United States Department of Agriculture
USGBC United States Green Building Council
UV Ultraviolet Light

W

WIS Wahiawā Irrigation System
WRF Water Reclamation Facility
WSA Wilbur Smith & Associates
WSFC Wastewater System Facility Charge
WWTP Wastewater Treatment Plant

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

(This page intentionally left blank.)

1 1 . 0
References

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

11.0 REFERENCES

Belt Collins Hawaii Ltd. (2007) *Social Impact Assessment*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Bill Engineering Inc. (2007) *Drainage Master Plan for Ho'opili*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Bill Engineering Inc. (2007) *Preliminary Wastewater Collection System Master Plan for Ho'opili*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Board of Water Supply. (2004) Available at: <http://www.hbws.org/cssweb/> (February 2008).

B.D. Neal & Associates. (2008) *Air Quality Study for the Proposed Ho'opili Project*. Kailua-Kona, Hawai'i. Prepared for D.R. Horton – Schuler Division.

City and County of Honolulu, Department of Land Utilization. (1987) *Coastal View Study*. Honolulu, Hawai'i.

City and County of Honolulu, Department of Planning and Permitting. (Revised 2000) *Ewa Development Plan*. Honolulu, Hawai'i. Available at: http://www.honoluluodpp.org/Planning/DevSust_Ewa.asp (December 2007)

City and County of Honolulu, Department of Planning and Permitting. (2004) *Annual Report on the Status of Land Use on Oahu: Fiscal Year 2003*. Honolulu, Hawai'i. Available at: <http://honoluluodpp.org/planning/dpar2/dpar2003.pdf>. (May 2005).

City and County of Honolulu, Department of Planning and Permitting. (2003) *Community Profiles: 2000 by Development Plan Area*. Available at: <http://honoluluodpp.org/planning/demographics2/CP2kDPA.pdf> (February 2006).

City and County of Honolulu, Department of Public Works. (1986) *Storm Drainage Standards*. Honolulu, Hawaii.

City and County of Honolulu, Department of Transportation Services. (2006) *Honolulu On The Move: An Update on the Honolulu High-Capacity Transit Corridor Project*. May/June 2006 Newsletter. Honolulu, Hawai'i.

City and County of Honolulu, Department of Transportation Services. (2007) *Honolulu High-Capacity Transit Corridor Project*. Honolulu, Hawai'i. Available at: http://honolulustransit.org/project_overview (June 2006).

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

Cultural Surveys Hawai'i, Inc. (2006) *An Archaeological Inventory Survey for the East Kapolei Project, Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu*. Kailua, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Cultural Surveys Hawai'i, Inc. (2007) *Cultural Impact Assessment for the East Kapolei Project, Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu*. Kailua, Hawai'i. Prepared for D.R. Horton – Schuler Division.

D.L. Adams Associates, Ltd. (2007) *Environmental Noise Assessment Report Ho'opili*. Kailua, Hawai'i. Prepared for PBR HAWAII.

Decision Analysts Hawai'i, Inc. (2007) *Ho'opili: Impact on Agriculture*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Hawaii Water Environmental Association. (2007) Available at: <http://www.hwea.org/images/usfbws/wrf.jpg> (February 2008).

Hawaiian Electric Company. (2007) *Electric and Magnetic Fields*. Honolulu, Hawai'i. Available at: <http://www.heco.com/vcmcontent/FileScan/PDFConvert/EMF.pdf> (February 2008).

Hawaiian Electric Company. (2006) Hawaiian Electric Company Issues RFP to Find Supplier of Biofuel – Ethanol or Biodiesel – to Fuel Planned New Oahu Generating Unit. Honolulu, Hawai'i. Available at: http://www.hawaiisenergyfuture.com/Images/20061226_Biofuels_RFP_press_release_FINAL.pdf (February 2008).

Hawaiian Electric Company. (2006) *HECO seeks ethanol for use in proposed new Campbell Industrial Park Generating Station and Existing Diesel Powered Generating Units*. Honolulu, Hawai'i. Available at: http://www.hawaiisenergyfuture.com/Images/Ethanol_press_release.pdf (February 2008).

Hutchinson, Alex. "Know Your Footprint: Waste, Smart Strategies for Putting a Lid on Household Garbage". *Popular Mechanics*, December 2007. Available at: http://www.popularmechanics.com/home_journal/how_to/4234061.html?series=44

Information Ventures, Inc. (2007) Available at: <http://infoventures.com/emf/state/va/vadh10-d.html> (February 2008).

Legrande Biological Surveys Inc. (2006) *Botanical Resources Assessment for the Ho'opili Project*. Waialua, Hawai'i. Prepared for D.R. Horton – Schuler Division.

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

Mikiko Corporation. (2007) *Economic and Fiscal Impact Assessment for Ho'opili*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Mikiko Corporation. (2007) *Market Assessment for Ho'opili*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

MK Engineers, Ltd. (2007) *Preliminary Electrical and Communications Master Plan for the Ho'opili Town Development*. Honolulu, Hawai'i. Prepared for D.R. Horton – Schuler Division.

Pacific Analytics, L.L.C. *Arthropod Survey and Assessment, Ho'opili Project, 'Ewa District, O'ahu, Hawai'i*. May 2008. Corvallis, Oregon. Prepared for PBR HAWAII and D.R. Horton – Schuler Division.

PBR HAWAII. *DHHL East Kapolei Development Parcel B Final Environmental Assessment*. January 2005. Honolulu, Hawai'i. Report prepared for the State of Hawai'i, Department of Hawaiian Home Lands.

PBR HAWAII. *University of Hawai'i West O'ahu Final Environmental Impact Statement*. December 2006. Honolulu, Hawai'i. Report prepared for the University of Hawai'i.

Rana Productions, Ltd. (2007) *A Survey of Avian and Mammalian Resources for the Ho'opili Development Project, 'Ewa District, O'ahu, Hawai'i – Main Parcels*. Kailua-Kona, Hawai'i. Prepared for PBR HAWAII.

Rana Productions, Ltd. (2007) *A Survey of Avian and Mammalian Resources for the Ho'opili Development Project, 'Ewa District, O'ahu, Hawai'i – Makai Detention Site*. Kailua-Kona, Hawai'i. Prepared for PBR HAWAII.

Rana Productions, Ltd. (2007) *A Survey of Avian and Mammalian Resources for the Ho'opili Development Project, 'Ewa District, O'ahu, Hawai'i – Mauka Detention Site*. Kailua-Kona, Hawai'i. Prepared for PBR HAWAII.

Rana Productions, Ltd. (2007) *A Survey of Avian and Mammalian Resources for the Ho'opili Development Project, 'Ewa District, O'ahu, Hawai'i – New 440 Tank, Transmission Line and New 228 Tank*. Kailua-Kona, Hawai'i. Prepared for PBR HAWAII.

Rana Productions, Ltd. (2007) *A Survey of Avian and Mammalian Resources for the Ho'opili Development Project, 'Ewa District, O'ahu, Hawai'i – Tank Site 1*. Kailua-Kona, Hawai'i. Prepared for PBR HAWAII.

State of Hawai'i, Department of Agriculture. (1977) *Agricultural Lands of Importance to the State of Hawaii*. Honolulu, Hawai'i.

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

State of Hawai'i, Department of Business, Economic Development and Tourism. (1991) *The Data Book*. Honolulu, Hawai'i.

State of Hawai'i, Department of Business, Economic Development and Tourism (1993) *Hawai'i Model Energy Code*. Honolulu, Hawai'i.

State of Hawai'i, Department of Business, Economic Development and Tourism Office of Planning. (1989) *The Hawaii State Plan*. Honolulu, Hawai'i.

State of Hawai'i, Department of Education. (2006) *School Status and Improvement Report School Year 2004-05*. Available at: <http://arch.k12.hi.us/school/ssir/2005/leeward.html> (June 2006).

State of Hawai'i, Department of Education. (2005) *"Public School 2005-06 Enrollment Slightly Lower."* 2005-06 Official Enrollment table from news release by Greg Knudsen, 15 September 2005. Available at: <http://lilinode.k12.hi.us/STATE/COMM/DOEPRESS.NSF/a1d7af052e94dd120a2561f7000a037c/4ca2735ab6a02f4e0a25707d0067d092?OpenDocument> (June 2006).

State of Hawai'i, Department of Education. (2004) *"Enrollment Count: Leeward Area and Charters Continue to Grow."* 2004-05 Official Enrollment table from news release by Greg Knudsen, 16 September 2004. Available at: <http://lilinode.k12.hi.us/STATE/COMM/DOEPRESS.NSF/0/67969154fb48f1430a256f110029c57d> (November 2004).

State of Hawai'i, Department of Transportation. (1991) *State Transportation Functional Plan*. Honolulu, Hawai'i.

State of Hawai'i, Department of Transportation and City and County of Honolulu Department of Transportation Services. (2004) *North South Road and Kapolei Parkway Final Environmental Assessment/FONSI*. Honolulu, Hawai'i.

State of Hawai'i, Department of Transportation and City and County of Honolulu Department of Transportation Services. (2004) *North South Road and Kapolei Parkway Revised Draft Environmental Assessment*. Honolulu, Hawai'i.

State of Hawai'i, University of Hawai'i Land Study Bureau. (1963) *Detailed Land Classification, Island of Oahu*. Honolulu, Hawai'i.

Tom Nance Water Resource Engineering. (2007) *Conceptual Water Master Plan for the Hoopili Project in East Kapolei, Oahu*. Honolulu, Hawai'i. Prepared for Bills Engineering Inc.

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

United States, Department of Agriculture Soil Conservation Service. (1972) *Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii*. Honolulu, Hawai'i.

United States, Environmental Protection Agency. (2007) Available at:
http://iaspub.epa.gov/tmdl/enviro_v2.wcontrol?p_id305b=HI-3-4-11_00 (February 2008).

Wilbur Smith Associates. (2007) *Traffic Impact Analysis Report (TIAR)*. Honolulu, Hawai'i.
Prepared for D.R. Horton – Schuler Division.

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

(This page intentionally left blank.)

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

12.0 COMMENTS ON THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE AND RESPONSES

The Environmental Impact Statement Preparation Notice (EISPN) was published in the March 8, 2007 issue of the OEQC *The Environmental Notice* and was sent to the agencies, organizations, and individuals listed in the following table. The public comment period on the EISPN was from March 8, 2007 to April 9, 2007. Agencies, organizations, or individuals that submitted comments on the EISPN are listed in bold. Comment and response letters have been reproduced and follow Table 12.1 below.

Table 12.1. EISPN Comment Letters

	AGENCY	EISPN MAIL DATE	DATE OF COMMENTS
STATE			
1	Department of Agriculture	03-07-07	--
2	Department of Accounting & General Services	03-07-07	04-04-07
3	Department of Business, Economic Development and Tourism	03-07-07	04-09-07
4	Department of Business, Economic Development and Tourism – Energy, Resources & Technology Division	03-07-07	--
5	Department of Business, Economic Development and Tourism – Land Use Commission	03-07-07	--
6	Department of Business, Economic Development and Tourism – Office of Planning	03-07-07	--
7	Department of Defense	03-07-07	--
8	Department of Education	03-07-07	04-10-07
9	Department of Hawaiian Home Lands	03-07-07	--
10	Department of Health – Environmental Planning Office	03-07-07	04-03-07
11	Department of Health – Office of Environmental Quality Control	03-07-07	03-30-07
12	Department of Land and Natural Resources	03-07-07	04-09-07
13	Department of Land and Natural Resources – Historic Preservation Division	03-07-07	03-27-07
14	Department of Transportation	03-07-07	04-09-07
15	Hawaii Community Development Authority	03-07-07	--
16	Office of Hawaiian Affairs	03-07-07	06-20-07
17	State Legislature – Representative Sharon Har	03-07-07	04-10-07
18	State Legislature – Representative Alex Sonson	03-07-07	--
19	State Legislature – Senator Mike Gabbard	03-07-07	--
20	State Legislature – Senator Clarence Nishihara	03-07-07	--
21	University of Hawai'i – Environmental Center	03-07-07	--

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

AGENCY		EISP MAIL DATE	DATE OF COMMENTS
22	University of Hawai'i – Center for Smart Building and Community Design	03-07-07	--
23	University of Hawai'i – Sea Grant	03-07-07	--
24	University of Hawai'i – West O'ahu	03-07-07	--
25	Hawai'i State Library	03-07-07	--
26	'Ewa Beach Public and School Library	03-07-07	--
27	Kapolei Public Library	03-07-07	--
28	Waipahu Public Library	03-07-07	--
29	Kaimukī Regional Library	03-07-07	--
30	Kāne'ohe Regional Library	03-07-07	--
31	Pearl City Regional Library	03-07-07	--
32	University of Hawai'i – Hamilton Library	03-07-07	--
33	Department of Business, Economic Development and Tourism Library	03-07-07	--
34	Legislative Reference Bureau	03-07-07	--
35	City and County of Honolulu Department of Customer Services Library (formerly the Municipal Reference and Records Center)	03-07-07	--
FEDERAL			
36	Department of the Army – Army Engineer District	03-07-07	05-07-07
37	Department of the Interior – Fish and Wildlife Service	03-07-07	--
38	Department of the Navy	03-07-07	--
CITY AND COUNTY OF HONOLULU			
39	Board of Water Supply	03-07-07	03-27-07
40	City Council – Councilmember Todd Apo	03-07-07	--
41	Department of Community Services	03-07-07	03-20-07
42	Department of Design and Construction	03-07-07	04-03-07
43	Department of Environmental Services	03-07-07	--
44	Department of Facility Maintenance	03-07-07	04-13-07
45	Department of Parks and Recreation	03-07-07	03-16-07
46	Department of Planning and Permitting	03-07-07	05-01-07
47	Department of Transportation Services	03-07-07	04-18-07
48	'Ewa Neighborhood Board, No. 23	03-07-07	--
49	Fire Department	03-07-07	03-28-07
50	Makakilo/Kapolei Neighborhood Board, No. 34	03-07-07	--
51	Police Department	03-07-07	03-27-07
52	Waipahu Neighborhood Board, No. 22	03-07-07	--
OTHER ORGANIZATIONS/INDIVIDUALS			
53	Aloun Farm, Inc.	03-07-07	--
54	Committee for Balanced Transportation	03-07-07	04/02/07 <u>03-31-07</u>
55	Enterprise Honolulu	03-07-07	--

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

	AGENCY	EISPN MAIL DATE	DATE OF COMMENTS
56	'Ewa Beach Boys and Girls Club	03-07-07	--
57	'Ewa Beach Lions Club	03-07-07	--
58	'Ewa Task Force	03-07-07	--
59	Guardian Angels	03-07-07	--
60	HASEKO (Ewa), Inc.	--	04-09-07
61	Hawaiian Electric Company, Inc.	03-07-07	10-05-07
62	Hawaiian Telcom	03-07-07	04-02-07
63	Malanai Iki Association	03-07-07	--
64	Mr. Frank Law	03-07-07	--
65	Palehua Community Association	03-07-07	--
66	Rotary Club	03-07-07	--
67	Royal Kunia Community Association	03-07-07	--
68	Salvation Army	03-07-07	--
69	Sugarland Farms	03-07-07	--
70	Village Park Community Association	03-07-07	--
71	West O'ahu Economic Development Association	03-07-07	--

HO'OPILI

~~DRAFT~~ FINAL ENVIRONMENTAL IMPACT STATEMENT

(This page intentionally left blank.)



February 8, 2008

Mr. Ernest Y. W. Lau, Public Works Administrator
State of Hawaii
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawaii 'i 96810

Attn: Bruce Bennett

**SUBJECT: HO'OPIHI ENVIRONMENTAL
PREPARATION NOTICE (EISPN) IMPACT STATEMENT**

Dear Mr. Lau:

Thank you for your letter dated April 4, 2007 (your reference number (P) 1073.7). We acknowledge your assessment that this project does not directly affect the Department of Accounting and General Services' projects or existing facilities, and therefore, the department has no comments to offer at this time.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

0A\06232503.01 DR_Honou-E_Kapole\NEISEISPN_Letter\NR-11 DAGS_response.doc

W. FRANK BURKARDT, ASIA
Chairman

THOMAS WITTEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL CHENG, ASIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, ACP
Principal

TOM SCINILLACCI
Senior Associate

RAYMOND HIGA, ASIA
Senior Associate

KEVIN K. NISHIMAWA, ASIA
Associate

KIM MUKAIYUEN, ACP
Associate

SCOTT AIKUA, ACP
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
100 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-2184
Tel: (808) 521-5631
Fax: (808) 521-1102
E-mail: ys@pbrhawaii.com

HIO OFFICE
101 Apunani Street
Honolulu, Hawaii 96813-1110
Tel: (808) 963-2233
Fax: (808) 591-4883

WAILUKU OFFICE
1787 Wahi Pt. Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 248-2878



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

APR - 4 2007

(P)1073.7

APR 08 2007

RUSS K. SAITO
COMPTROLLER

LINDA LINGELE
SECRETARY

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: EISPN to Reclassify Approximately 1,704.265 Acres from Agriculture to Urban, Hoopili, Oahu, TMK: 9-1-17:04 (portion), 59, and 72; 9-1-18:01 and 04; 9-1-10:02, 14 (portion), and 15 (portion) and 9-2-02:02, and 9-2-02:01 (portion), 04, 05, 06 and 07

Thank you for your letter dated March 7, 2007. This project does not directly affect the Department of Accounting and General Services' projects or existing facilities, and we have no comments to offer at this time.

If you have any questions, please have your staff call Mr. Bruce Bennett of the Planning Branch at 586-0491.

Sincerely,

ERNEST Y. W. LAU
Public Works Administrator

BB:mo

c: Ms. Genevieve Salmonson, DOH-OEQC
Mr. Anthony Ching, DBEDT-Land Use Commission



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

STRATEGIC INDUSTRIES DIVISION
235 South Beretania Street, Leleppa A, Kanehamahele Bldg., 5th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2356, Honolulu, Hawaii 96804

LINDA LINGLE
THEODORE E. LIU
MARK K. ANDERSON
ASST. DIRECTOR

Telephone: (808) 552-3807
Fax: (808) 552-2556
Web site: www.hawaii.gov/bedt

PBR Hawaii
April 9, 2007
Page 2

April 9, 2007

PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

A/In: Vincent Shigetomi

Re: Environmental Impact Statement Preparation Notice (EISPN)

Ho'opili, Ewa, Oahu
Tax Map Key: 9-1-17:04 (portion), 59, and 72; 9-1-18:01 and 04; 9-1-10: 02, 14 (portion), and 15 (portion) and 9-2-02:02, and 9-2-02:01 (portion), 04, 05, 06 and 07

In response to your March 7, 2007, notice, thank you for the opportunity to provide comments on the EISPN for the Ho'opili development. The proposed project would have an area of 1,704 acres including a mixed-use, transit-ready community including: low-medium density residential/live-work, mixed-use medium density residential, mixed-use/high density residential, light industrial mixed-use/business, schools, parks, open space and roads.

We would like to call your attention to: (1) State energy conservation goals; and, (2) energy and resource efficiency and renewable energy and resource development.

1. State energy conservation goals. Project buildings, activities, and site grounds should be designed and/or retrofit 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 consult the City and County of Honolulu Energy Code early in your project. Hawaiian Electric Company, Inc. may also have suggestions and demand-side management programs that offer rebates for installation of energy efficient technologies.

2. Energy and resource efficiency and renewable energy and resource development. We do not note any proposed covenants to enhance the sustainability of the development, including green architecture, solar water heating and photovoltaic energy for appliances, shading of exterior lighting, and water conservation measures.

We encourage the parties to this development to make a further commitment to energy and resource efficiency and include a requirement in the Conditions, Covenants, and Restrictions for a development that meets the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Certification. Zero-Net Energy Green Homes should be considered.

Our website (<http://www.hawaii.gov/bedt/info/energy/efficiency/>) provides detailed information on guidelines, directives and statutes, as well as studies and reports on aspects of energy efficiency. Please also do not hesitate to contact Carlyn Shon, Energy Efficiency Branch Manager, at telephone number 587-3810, for additional information on LEED, energy efficiency, and renewable energy resources.

Sincerely,

Maurice H. Kaya
Chief Technology Officer

c: OEQC
State Land Use Commission



February 9, 2008

WIKIANGIRI AND TASHA
Chairwomen

THOMAS W. FREN, ASLA
President

R. SHANLIN CANAN, ASLA
Executive Vice-President

RUSSELL Y. CHENG, JANIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT TAMURA KAMAHI, ACP
Principal

TOM KUSINILLI, ACP
Senior Associate

KAWAONDE HIGA, ASLA
Senior Associate

KIMIKAWA, ASLA
Associate

KIMIKAWA YUEN, LEED AP
Associate

SCOTT LAUKA, AIA/LEED
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1071 Zhongyuan Street
ASLA Executive Office
Honolulu, HI 96813-3164
Tel: (808) 531-6633
Fax: (808) 523-1472
E-mail: aysashimong@pbbhawaii.com

HILO OFFICE
101 Aupuni Street
Hilo Lagoon Center, Suite 310
Hilo, Hawaii 96720-1963
Tel: (808) 933-3390

WAILUKU OFFICE
1111 Waiolu Road, Suite 101
Wailuku, HI 96793-7571
Tel: (808) 242-3838

Mr. Maurice H. Kaya
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 9, 2008
Page 2

Thank you very much for calling our attention to your website which provides detailed information on guidelines, directives, and statutes, as well as studies and reports on aspects of energy efficiency (<http://www.hawaii.gov/dbedt/info/energy/efficiency/state>).

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

0:\back\202\03.01.DK.Horton-E.Kapelaere\EIS\SPN.Letter\BL-18.DBEDT.response.doc

SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISPN)

Dear Mr. Kaya:

Thank you for your letter dated April 9, 2007. We offer the following responses to your comments:

1. The project will address the applicable provisions of Chapter 344, Hawaii Revised Statutes (HRS) ("State Environmental Policy") and Chapter 236, HRS ("Hawaii State Planning Act"). Where feasible, project buildings, activities, and site grounds will be designed with energy-saving considerations. Given the natural climate, the project will be suited for the use of renewable energy technologies including photovoltaics. In addition, based on DBEDT's recommendations, Ho'opili's mechanical and electrical consultants, in consultation with its sustainability consultant, will be directed to review the City and County of Honolulu's Energy Code early in the project and to consult with Hawaiian Electric Company, Inc. (HECO) on demand-side management programs that offer rebates for installation of energy-efficient technologies.

2. Please note that sustainability guidelines are being considered for the Ho'opili project. The developer has submitted an application for a Leadership in Energy and Environmental Design (LEED) Neighborhood Design (ND) designation by the U.S. Green Building Council (USGBC) and was placed on the list of LEED ND pilot projects. According to the USGBC website, "The LEED for Neighborhood Design Rating System integrates the principles of smart growth, urbanism, and green building into the first national standard for neighborhood design. LEED certification provides independent, third-party verification that a development's location and design meet accepted high standards for environmentally responsible, sustainable, development. LEED for Neighborhood Design is a collaboration between the U.S. Green Building Council, the Congress for the New Urbanism, and the Natural Resources Defense Council."



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2050
HONOLULU, HAWAII 96824

OFFICE OF THE SUPERINTENDENT
April 10, 2007

Mr. Vincent Shigekuni
PBR, HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement Preparation Notice for Ho'opi'i, East Kapolei, Ewa District

The Department of Education (DOE) has reviewed the Environmental Impact Statement Preparation Notice (EISPN) for the proposed Ho'opi'i project in East Kapolei. DOE has met on several occasions with the developer of the project and has had lengthy discussions on the school impacts of almost 12,000 additional residential units. The DOE concurs with the EISPN statement that the total number of public schools that need to be built within the project is not established, pending more definitive data about the proposed housing, but that a minimum of five schools will be required. We expect to continue to meet in the future as more information on the residential units becomes available.

The DOE is concerned with the school enrollment numbers in section 4.9.1 School. The table on page 47 and 48 does not include the middle school and high school serving the Campbell High School complex area. Also, the enrollment figures are not the official figures used by the Facilities Development Branch. In addition, since enrollment projections are updated every year, for every school, it is important to identify the year in which the projections were made. Please contact the Facilities Development Branch to update the enrollment figures for the Draft Environmental Impact Statement.

The DOE has no other comments at this time. We appreciate the opportunity to comment on the EISPN. If you have any questions, please call Heidi Moecker of the Facilities Development Branch at 733-4862.

Very truly yours,

Patricia Hamamoto
Superintendent

PH:jmb

- cc: Randolph Moore, Acting Assistant Superintendent, OBS
- Duane Kasitawai, Public Works Administrator, FDB
- Mamo Carreim, CAS, Campbell/Kapolei/Waianae Complex Areas
- Genevieve Salmanson, OEQC
- Anthony Ching, SLUC



February 8, 2008

W. FRANK BRANDT, HASLA
Chairman

HOMAS WITLEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, FASHA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURKAM, AICP
Principal

TOM SCHINELLAI, AICP
Senior Associate

RAYMOND HIGA, ASLA
Senior Associate

KENYUKA NIMIBAWA, ASLA
Associate

KIM MUKAMI YUEN, LEED AP
Associate

SCOTT ALIHA, AIA
Associate

SCOTT MURKAM, ASLA
Associate

HONOLULU OFFICE
ASB Tower, Suite 650
Honolulu, Hawaii 96813-3884
Tel: (808) 421-3631
Fax: (808) 521-1622
E-mail: admin@pbrhawaii.com

HILO OFFICE
101 August Street
Hilo, Hawaii 96720
Tel: (808) 937-2323
Fax: (808) 937-4883

WAILUKU OFFICE
1797 Wili Wili Lane, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 342-2878

Ms. Patricia Hamamoto, Superintendent
State of Hawaii
Department of Education
P.O. Box 2360
Honolulu, Hawaii 'i 96804

Attn: Ms. Heidi Moecker

SUBJECT: HO'OPI'I ENVIRONMENTAL PREPARATION NOTICE (EISPN) IMPACT STATEMENT

Dear Ms. Hamamoto:

Thank you for your letter dated April 10, 2007 (your reference number: PH:jmb). We offer the following responses to your comments:

1. We acknowledge your assessment that the EISPN statement that the total number of public schools that need to be built within the project is not established, pending more definitive data about the proposed housing, but that a minimum of five schools will be required.

2. We acknowledge your concern with the school enrollment numbers in the EISPN. As such, the Facilities Development Branch will be contacted to update the enrollment figures in the Draft Environmental Impact Statement (EIS).

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96813-3378

CRYSTINE L. FURUKO, M.D.
DIRECTOR OF HEALTH

IN Reply, please refer to:
EPO-07-060

April 3, 2007

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

SUBJECT: Environmental Impact Statement (EIS) Preparation Notice for Hoopili Project,
Ewa, Oahu, Hawaii

TIMK: (1) 9-1-017: 004 (portion), 059 and 072

(1) 9-1-018: 001 and 004

(1) 9-1-010: 002, 014 (portion) and 015 (portion)

(1) 9-2-002: 001 (portion), 002, 004, 005, 006 and 007

Thank you for allowing us to review and comment on the subject documents. The documents were routed to the various branches of the Department of Health (DOH) Environmental Health Administration. We have the following Clean Water Branch, Hazard Evaluation & Emergency Response Office and General comments.

Clean Water Branch (CWB)

The CWB has reviewed the limited information contained in the subject document and offers the following comments:

1. The Army Corps of Engineers should be contacted at (808) 438-9258 for this project. Pursuant to Federal Water Pollution Control Act (commonly known as the "Clean Water Act") (CWA) Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40, Code of Federal Regulations (CFR), Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.
2. In accordance with HAR, Sections 11-55-04 and 11-55-34.05, the Director of Health may require the submittal a Notice of Intent (NOI) for general permit coverage authorized under the National Pollutant Discharge Elimination System (NPDES). An NOI to be covered by an

Mr. Shigekuni
April 3, 2007
Page 2

NPDES general permit is to be submitted at least 30 days before the commencement of the respective activity. A separate NOI is needed for coverage under each NPDES general permit. The NOI forms may be picked up at our office or downloaded from our website at: <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/forms/genl-index.html>

- a. Storm water associated with industrial activities, as defined in Title 40, CFR, Sections 122.26(b)(14)(i) through 122.26(b)(14)(ix) and 122.26(b)(14)(xi). [HAR, Chapter 11-55, Appendix B]
 - b. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the commencement of the construction activities. [HAR, Chapter 11-55, Appendix C]
 - c. Discharges of treated effluent from leaking underground tank remedial activities. [HAR, Chapter 11-55, Appendix D]
 - d. Discharges of once through cooling water less than one (1) million gallons per day. [HAR, Chapter 11-55, Appendix E]
 - e. Discharges of hydrotesting water. [HAR, Chapter 11-55, Appendix F]
 - f. Discharges of construction dewatering effluent. [HAR, Chapter 11-55, Appendix G]
 - g. Discharges of treated effluent from recycled water distribution systems. [HAR, Chapter 11-55, Appendix J]
 - h. Discharges of storm water from a small municipal separate storm sewer system. [HAR, Chapter 11-55, Appendix K]
3. In accordance with HAR, Section 11-55-38, the applicant for an NPDES permit is required to either submit a copy of the new NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the DOH that the project, activity, or site covered by the NOI or application has been or is being reviewed by SHPD. If applicable, please submit a copy of the request for review by SHPD or SHPD's determination letter for the project.
 4. Any discharges related to project construction or operation activities, with or without a Section 401 WQC or NPDES permit coverage, shall comply with the applicable State Water

Mr. Shigekuni
April 3, 2007
Page 3

Quality Standards as specified in HAR, Chapter 11-54.

The Hawaii Revised Statutes, Subsection 342D-50(a), requires that "[i]n]o person, including any public body, shall discharge any water pollutants into state waters, or cause or allow any water pollutant to enter state waters except in compliance with this chapter, rules adopted pursuant to this Chapter, or a permit or variance issued by the director."

If you have any questions, please contact the Engineering Section, CWB, at 586-4309.

Hazard Evaluation & Emergency Response Office (HEER)

As a common practice, lands formerly used for sugarcane production are now being developed into communities where residential home, schools and commercial businesses are being constructed. Chemicals associated with the sugarcane industry persist in soils today and may be a threat to public health and the environment. Elevated arsenic levels were discovered in soil at formerly sugarcane production areas on the islands. The HEER Office has identified former sugarcane production areas for assessment throughout the state and plans to work with property owners to conduct environmental assessment to identify and address elevated soil arsenic levels prior to finalizing development plans for the properties

The parcels listed in the EIS Preparation Notice for the Hoopili Project were used for sugarcane production and should be assessed for chemicals associated with the sugarcane industry. Environmental assessments conducted on adjacent parcels have identified chemicals of concern. The developers of the Hoopili Project and the DOH have met to discuss addressing potential risks at the site through environmental assessments. Section 1.9 of the EIS Preparation Notice should include an investigation of hazardous substances. If contaminants are found at elevated levels, then additional assessment is needed to determine potential risks and the need for remedial action. Removal or remedial plans must comply with Chapter 128D, Environmental Response Law, HRS, and Title 11, Chapter 451, HAR, State Contingency Plan.

If you have any questions, please contact HEER Office at 586-4250.

General

We strongly recommend that you review all of the Standard Comments on our website: www.state.hi.us/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project should be adhered to.

Mr. Shigekuni
April 3, 2007
Page 4

If there are any questions about these comments please contact Jaccai Liu with the Environmental Planning Office at 586-4346.

Sincerely,



KELVIN H. SUNADA, MANAGER
Environmental Planning Office

c: EPO
CWB
HEER
Anthony Ching, State Land Use Commission



Mr. Kelvin H. Sunada
 SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE (EISPN)
 February 9, 2008
 Page 2

February 9, 2008

WTRANK IRANDE PASIA
 Chairman

THOMAS WUTIN, ASMA
 President

R STANTON, ASMA
 Executive Vice President

RUSSELL Y. CHUNG, ASMA
 Executive Vice President

VINCENT SHIGEKUNI
 Vice President

GRANT T. MURAKAMI, ACP
 Principal

THOMAS INOUE, ACP
 Senior Associate

KANONDI T. HIGA, ASIA
 Senior Associate

KIYOSUKI NISHIKAWA, ASIA
 Associate

KENJI KAMAYAMA, JLEP, ACP
 Associate

SCOTT ALIKA AIBOGO
 Associate

SCOTT MURAKAMI, ASIA
 Associate

HONOLULU OFFICE
 1411 Kalia Road, Suite 600
 Honolulu, Hawaii 96813-4184
 Tel: (808) 522-1100
 Fax: (808) 522-1102
 E-mail: info@pbrhawaii.com

HILLO OFFICE
 411 Aiea Drive, Suite 310
 Hilo, Hawaii 96720-4242
 Tel: (808) 951-3139
 Fax: (808) 951-1959

WAILUKU OFFICE
 1255 Wailuku Road, Suite 9
 Wailuku, Hawaii 96751-1571
 Tel: (808) 242-2678

Mr. Kelvin H. Sunada, Manager
 Environmental Planning Office
 State of Hawaii's
 Department of Health
 P.O. Box 3378
 Honolulu, Hawaii 96801-3378
 Attn: Mr. Jiaciti Liu

SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT
 PREPARATION NOTICE (EISPN)

Dear Mr. Sunada:

Thank you for your letter dated April 3, 2007 (your reference number: EPO-07-060). We offer the following responses to your comments:

Clean Water Branch (CWB)

1. The Army Corps of Engineers was provided a copy of the EISPN but was unable to determine whether a Federal permit (including a Department of Army permit) is required for this project. An application for jurisdictional determination will be submitted to the Army Corps of Engineers.
2. As stated in the EISPN, a National Pollutant Discharge Elimination System (NPDES) Permit(s) will be required for the project.

Hazard Evaluation & Emergency Response Office (HEER)

As you may be aware, the developer has been coordinating with the Department of Health (DOH) to address potential risks at the project site. As we understand it, since May of 2007, HEER's interest is now in the presence (or absence) of dioxin, and may be concerned with arsenic if site conditions warrant.

General

4. As recommended, the Standard Comments on the Department of Health website (<http://www.state.hi.us/doh/environmental/cen-planning/landuse/landuse.html>) have been reviewed and will be adhered to as applicable.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
 Vice President

cc: Office of Environmental Quality Control

UNDA LUNGE
OFFICE OF HEALTH



GENEVIÈVE SALMONSON
Director

STATE OF HAWAII
DEPARTMENT OF HEALTH
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
LEIOPAPA A KAMIEHAHEHA, SUITE 702
HONOLULU, HAWAII 96816
Telephone (808) 586-4185
Facsimile (808) 586-4186
E-mail: oeq@doh.hawaii.gov

March 30, 2007

Mr. Robert Bruhl
D. R. Horton - Sealing Division
828 Fort Street Mall, 4th Floor
Honolulu, Hawaii 1 96813

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bialoop Street
Honolulu, Hawaii 1 96813

Mr. Anthony Ching
State Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 1 96804

Dear Messrs. Bruhl, Shigekuni and Ching:

The Office of Environmental Quality Control has reviewed the final environmental assessment for the Hoopii Project, Tax Map Key 9-1-17-04 (portion), 59, and 72; 9-1-18-01 and 04; 9-1-10-02, 14 (portion), and 15 (portion) and 9-2-02-02, and 9-2-02-01 (portion), 04, 05, 06, and 07, in the judicial district of Ewa. The Office of Environmental Quality Control offers the following comments for your consideration and response.

1. **Surface Water Quality Hydrologically Downgradient of the Project Site:** The final environmental assessment discusses groundwater resources and hydrology in Section 3.5, but needs to discuss the quality of surface waters downgradient from the project and what kinds of direct, indirect or cumulative impacts the project will have on surface water quality. Please discuss this in the draft environmental impact statement.
2. **Biological Survey:** In an environmental impact statement in Ewa for former sugar cane lands, several colonies of endangered plants were found. Please include in the draft environmental impact statement a biological survey of the project site.
3. **Native and Indigenous Vegetation for Post Construction Landscaping:** Please consider planting the graded and disturbed areas of the project site with native and indigenous vegetation after construction has been completed. Please see <http://www.state.hi.us/health/oeqc/guidance/sustainable.htm>.

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

GENEVIÈVE SALMONSON
Director of Environmental Quality Control



February 8, 2008

W FRANK BRANDT, FLSA
Chairman

THOMAS WITTL, ASLA
President

R. SIAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, FLSA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURAKAMI, ACP
Principal

TOM SCHINLACH
Senior Associate

RAYMOND L. HIGA, ASLA
Senior Associate

ALYSON N. NISHIKAWA, ASLA
Associate

NABUMBAH YUS, LLDP/AP
Associate

SCOTT ALMA ARRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1031 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-3184
Tel: (808) 521-5691
Fax: (808) 521-1102
E-mail: info@pbrhawaii.com

HILLO OFFICE
1031 Bishop Street
ASB Tower, Suite 710
Honolulu, Hawaii 96813-3262
Tel: (808) 961-3223
Fax: (808) 951-9683

WAILUKU OFFICE
1782 Wahi La Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 432-2878

Mrs. Katherine P. Kealoha, Director
State of Hawaii
Department of Health
Office of Environmental Quality Control
235 South Beretania Street
Leiopapa A, Kamohamoha, Suite 702
Honolulu, Hawaii 1 96813

Attn: Mr. Leslie Segundo

**SUBJECT: HO'OPII ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISPN)**

Dear Ms. Kealoha:

Thank you for the letter dated March 30, 2007. We offer the following responses to your comments:

1. Please note that a discussion of the quality of surface waters downgradient from the project and what kinds of direct, indirect, or cumulative impacts the project will have on surface water quality will be included in the Draft Environmental Impact Statement (EIS).
2. As requested, a biological survey of the project site will be included and summarized in the Draft EIS.
3. Thank you for calling our attention to your website which establishes guidelines for sustainable building design in Hawaii. (<http://www.state.hi.us/health/oeqc/guidance/sustainable.htm>). Native and indigenous vegetation will be considered in the selection of plan materials.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

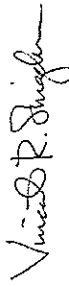
Ms. Katherine P. Kealoha

SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 8, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

C:\h\p252533.01 DR. Horton-ES Kapolei\EIS\EISPN Letters\BL-07 OEQC response.doc



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 9, 2007

PBR Hawaii
ASB Tower Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813
Attention: Vincent Shigekuni

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

Gentlemen:

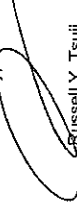
Subject:

Ho'opili Environmental Impact Statement Preparation Notice, Kapolei, Oahu, Tax Map Key: (1) 9-1-17:59, 72; 9-4-18:1, 4; 9-4-40:2, 14, 15; 9-2-2:2, 9-2-2:1,4 to 7

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Division of Water Resource Management, Land Division - Oahu District, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,



Russell Y. Tsuji
Administrator

LINDA LINGGLE
GOVERNOR OF HAWAII



2007 MAR 27
RECEIVED
LAND DIVISION
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE OF HAWAII
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

7-2-07
Ed.

COMMISSION ON WATER RESOURCE MANAGEMENT
ROBERT F. HALLIDAY
DIRECTOR
STATE OF HAWAII
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

RECEIVED
37 MAR 9 3:47
COMMISSION ON WATER
RESOURCE MANAGEMENT

MEMORANDUM

TO:

- DLNR Agencies:
 - Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Div. of Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division - Oahu District/Keith/Gavin/Barbara Lee

FROM:

Russell Y. Tsuji
Ho'opili Environmental Impact Statement Preparation Notice
Kapolei, Oahu
APPLICANT: PBR Hawaii & Associates, Inc. on behalf of D.R. Horton - Schuler, LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 5, 2007.

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

Attachments

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

Signed: *Russell Y. Tsuji*
Date: 3/23/07

LINDA LINGGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809



REBECCY YOUNG
DIRECTOR
COMMISSION ON WATER RESOURCE MANAGEMENT
ROBERT F. HALLIDAY
DIRECTOR
STATE OF HAWAII
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 8, 2007

MEMORANDUM

TO:

- DLNR Agencies:
 - Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Div. of Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division - Oahu District/Keith/Gavin/Barbara Lee

FROM:

Russell Y. Tsuji
Ho'opili Environmental Impact Statement Preparation Notice
Kapolei, Oahu
APPLICANT: PBR Hawaii & Associates, Inc. on behalf of D.R. Horton - Schuler, LLC

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 5, 2007.

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

Attachments

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

Signed: *Russell Y. Tsuji*
Date: 3/13/07



February 8, 2008

WIKAKA BRANDI PASLA
Chairman

THOMAS W. LUTEN, AMLA
President

R. STANLEY SCANN, AMLA
Executive Vice President

BRISSETTE L. CHUNG, PASHA
Executive Vice President

VINCENT SHIGEKUNI
Vice President

GRANT LAURAKAMI, MCP
Principal

TOMOSHINJI AICHI
Senior Associate

KAYMOND L. HIGA, AMLA
Senior Associate

MAIYUKI K. KIMIKAWA, AMLA
Associate

ANIMAKIAMI TEUN, LEI'D'AV
Associate

SCOTT ALIKA ARIBIGI
Associate

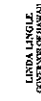
SCOTT MI KAKAMI, AMLA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower 6, Suite 640
Honolulu, Hawaii 96814-3181
Tel: (808) 521-3181
Fax: (808) 521-3184
E-mail: pbrhawaii@pbrhawaii.com

HILLO OFFICE
1001 Bishop Street
Elegance Center, Suite 710
Hale, Hawaii, 96720-4362
Tel: (808) 863-3332
Fax: (808) 863-3359

WAILUKU OFFICE
1755 Wahi'ia Loop, Suite 4
Wailuku, Hawaii 96791-1371
Tel: (808) 532-2574

O:\06252503.01 DK\Itonone-B_Kapolei\RE\EIS\SPN Letter\BL14 DLNR response.doc



APR 05 2007

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

PETER T. YOUNG
CHAIRMAN
BOARD OF LAND AND NATURAL RESOURCES
COMMISSIONER OF WATER RESOURCES MANAGEMENT
ROBERT K. HANSEN
DEPUTY DIRECTOR - LAND
DEAN HANAMA
ACTING DEPUTY DIRECTOR - WATER
AGRICULTURE SERVICES
NEWALU O. OLOVANA
COMMISSIONER OF WATER RESOURCES
CONSERVATION AND RECREATION
COORDINATOR OF NATURAL LANDS
MANAGEMENT
HONOLULU, HAWAII
STATE HISTORIC PRESERVATION DIVISION
KAPOLEI, HAWAII 96707

March 27, 2007

Mr. Vincent Shigekuni
PBR Hawaii & Associates, Inc.
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, HI 96813

Dear Mr. Shigekuni:

SUBJECT: Chapter 6E-8 Historic Preservation Review –
Environmental Impact Statement Notice of Intent (EISPN), Ho‘opi‘i Project
Honoh‘u‘u‘u Ahupua‘a, I‘iwa District, Island of O‘ahu
TWK: (1) 9-1-various plats & parcels, 9-2-various plats & parcels

Thank you for submitting the aforementioned document, which we received on March 8, 2007. The proposed undertaking consists of the reclassification of approximately 1554 acres of land from the Agricultural District to the Urban District.

As stated in your document, “[a] preservation plan and archaeological monitoring plan will be prepared and submitted to SHPD for their review and approval.” We look forward to reviewing these documents, and recommend that you include all relevant historic-preservation documents, including all final reports and SHPD acceptance letters, in the draft EIS.

We look forward to reviewing the Draft EIS.

Please contact Mr. Adam Johnson (O‘ahu Assistant Archaeologist) at (808) 692-8015 if you have any questions or concerns regarding this letter.

Aloha,

Melanie Chinen, Administrator
State Historic Preservation Division

anj:

cc: Office of Environmental Quality Control
Land Use Commission

**SUBJECT: HO‘OPI‘I ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISPN)**

Dear Mr. Tsuji:

Thank you for your letter dated April 9, 2007. We understand that the EISPN was distributed to the following divisions:

- 1. Division of Water Resource Management (no comments); and
- 2. Land Division – Oahu District/Keith/Gavin/Barbara Lee (no comments).

We acknowledge that the Department of Land and Natural Resources has no other comments to offer on the subject matter.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control



February 8, 2008

WIRANKIRANDI PASLA
Chairman

THOMAS W. TUTIN, ASLA
President

B. SHANUKAN, ASLA
Executive Vice President

RUSSELL K. CHUNG, ASLA
Executive Vice President

VINCENT SHIGEKUNI
Vice President

GRANT LAURAKAMAI, ACP
Principal

TOM SCHILL, ACP
Senior Associate

RAMOND L. HIGA, ASLA
Senior Associate

MIYUKI KAMIKAWA, ASLA
Associate

KIMIKAWA MIYUKI, LEED AP
Associate

SCOTT ALKA, ABBQ
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1401 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96817-5151
Tel: (808) 524-1122
F: (808) 524-1123
E: mail: syashim@pbrhawaii.com

HILO OFFICE
101 Main Street
Hilo Legation Center Suite 310
Hilo, Hawaii 96720-4012
Tel: (808) 961-1313
Fax: (808) 961-1989

WAILUKU OFFICE
125 Wailuku Loop, Suite 4
Wailuku, Hawaii 96791-1121
Tel: (808) 312-2628

Ms. Meleane Chinen, Administrator
State of Hawaii

Department of Land and Natural Resources
State Historic Preservation Division
601 Kamokila Boulevard, Room 555
Kapolei, Hawaii 'i 96707

Attn: Adam Johnson

**SUBJECT: HO'OPLI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISPN)**

Dear Ms. Chinen:

Thank you for your letter dated March 27, 2007 (your reference number LOG NO: 2007.0909; DOC NO: 0703amj09; archaeology). As stated in the EISPN, a preservation plan and archaeological monitoring plan will be prepared and submitted to SHPD for its review and approval. As recommended, the Draft EIS will include all relevant historic-preservation documents, including all final reports and SHPD acceptance letters.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

O:\06252403.01 DR Horton - E Kapolei\EIS\EISPN Letters\BL_09 SHPD response.doc

LINDA LINGLE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
808 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5087

April 9, 2007

Mr. Vincent Shigekuni
PBR Hawaii & Associates, Inc.
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Ho'opli
D. R. Horton - Schuler, LLC
EIS Preparation Notice for LUC Petition No. A06-771 Filing
TMK: 9-1-17: 04 (portion), 59, and 72; 9-1-18: 01 and 04;
9-1-10: 02, 14 (portion), and 15 (portion) and 9-2-02: 02, and
(portion), 04, 05, 06 and 07

Thank you for providing the notification on the subject proposed land development project. We have the following initial comments as an interested party:

1. The site of the project is not directly under aircraft flight paths for Kalaeloa Airport or Honolulu International Airport. However, the developer and prospective residents/occupants should be advised and made aware that single-event noise may occur from potential overflights of aircraft or under certain weather/atmospheric conditions, particularly from aircraft approaching or departing Kalaeloa Airport.
2. The development of the project will have a significant traffic impact on our highway facilities in the Kapolei-Ewa region. The developer should prepare and submit a traffic impact analysis report (TIAR). The TIAR should cover both project traffic impacts and the cumulative traffic impacts to the community and region, which the project will be contributing to, including the existing and future road network in the area. Accesses and connections to any State highway also need to be identified. The TIAR should provide recommended and required transportation mitigation measures and roadway improvements to address the impacts, including the developer's participation in and contribution to provide the mitigation measures and improvements. We will need to review and approve the TIAR.



Mr. Vincent Shigekuni
Page 2
April 9, 2007

STP 8.2450

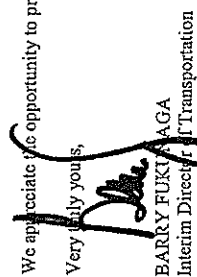
February 8, 2008

3. We should be included in agency reviews and approvals of the drainage plans for the subject project.
4. Any construction work by or for the subject project that can affect a State highway and/or can occur within or adjoin a State highway right-of-way will need our prior review and approval.

We will defer any other additional comments on the subject project until we receive and have the opportunity to review more information on the project. We would appreciate receiving at least five (5) copies of any report or document on the project for review by our operating divisions.

We appreciate the opportunity to provide our comments.

Very truly yours,


BARRY FUKUIWAGA
Interim Director of Transportation

c: Genevieve Gaimonson, Office of Environmental Quality Control
Laura Thielens, Office of Planning, DBEDT
Anthony Ching, Land Use Commission

WILKINSON BRANDT
Chairman

THOMAS W. WHYTE
President

K. SEAN DI NGAN
Executive Vice-President

RUSSELL L. CHUNG
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI
Principal

TOM SCHINELLACCI
Senior Associate

RAYMOND T. HIGA
Senior Associate

KELVIN NISHIKAWA
Associate

KIM MIKAMI
Associate

SCOTT SIMA
Associate

SCOTT MURAKAMI
Associate

HONOLULU OFFICE
1001 Bishop Street
5th Floor, Suite 620
Honolulu, Hawaii 96813-2484
Tel: (808) 521-5641
Fax: (808) 521-1082
E-mail: spokane@pbrhawaii.com

HILLO OFFICE
1001 Bishop Street
10th Floor, Suite 310
Honolulu, Hawaii 96813-2522
Tel: (808) 961-3223
Fax: (808) 961-1989

WAILUKU OFFICE
1297 Wai'oli Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2828

Mr. Brenton Morioka, Interim Director
State of Hawaii
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

SUBJECT: HO'OPIHI ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISP/N)

Dear Mr. Morioka:

Thank you for the letter dated April 9, 2007 (your reference number: STP 8.2450). We offer the following responses to your comments:

1. We acknowledge that single-event noise may occur from potential overflights of aircraft or under certain weather/atmospheric conditions, particularly from aircraft approaching or departing Kaha'ou Airport.
2. As suggested a traffic impact analysis report will be prepared and submitted to the Department of Transportation (DOT) for review and approval. The traffic consultant has met and/or spoken with various DOT staff to confirm the intersections to be analyzed and the general methodology to be used in estimating trip generation.
3. As requested, the DOT will be included in agency reviews and approvals of the drainage plans for the subject project.
4. We acknowledge that any construction work by or for the subject project that can affect a State highway and/or can occur within or adjoin a State highway right-of-way will need prior DOT review and approval.
5. We acknowledge that the DOT will defer any other additional comments on the subject project until additional information regarding the project is provided.
6. Please be assured that your agency will receive at least five (5) copies of the Draft EIS and at least five (5) copies of any additional reports and/or documents as soon as they are available for review.

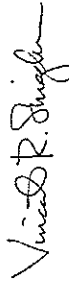
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

Mr. Brennon Morioka
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISP/N)
February 8, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

0:\uh\252503.01 DR\Hawaii-E\Kapele\EISP\EISP\Letters\WV-13 DOT response.doc

PHONE (808) 594-1883



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPOLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

FAX (808) 594-1865

HRD072945

June 20, 2007

Vincent Shigekuni
Consultant
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, HI 96813

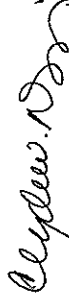
RE: Request for comment on an Environmental Impact Statement Preparation Notice for the proposed Ho'opili project located in East Kapolei; TMKs: 9-1-017:004, 059 and 072; 9-1-018:001 and 004; 9-1-010:002, 014 and 015; 9-2-002:002; and 9-2-002:001, 004, 005, 006 and 007

Dear Vincent Shigekuni,

The Office of Hawaiian Affairs (OHA) is in receipt of your request for comments on the above-referenced proposal, which would allow for the reclassification of approximately 1,554 acres of land from the Agricultural District to the Urban District. We apologize for the delayed response and offer no comments at this time.

Thank you, however, for the opportunity to comment initially. OHA looks forward to the opportunity to review the forthcoming Draft Environmental Impact Statement in greater detail. If you have further questions or concerns, please contact Heidi Guth at (808) 594-1962 or e-mail her at heidig@oha.org.

Sincerely,



Clyde W. Nāmu'ō
Administrator

Vincent Shigekuni, PBR HAWAII
June 20, 2007
Page 2

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

Anthony Ching,
State of Hawaii,
Land Use Commission
P.O. Box 2359
Honolulu, HI 96804



February 8, 2008

W. JAMES BRANDT JASMA
Chairman

THOMAS WITLEN ASHA
President

R. STAN DUNCAN ASHA
Executive Vice-President

RUSSELL Y. CHUNG ASHA
Executive Vice-President

VINCENT SHIGEKUNI
Vice President

GRANT MURAKAMI ASHA
Principal

TOM SCHILLACHP
Senior Associate

RAYMOND Y. HIGA ASHA
Senior Associate

KEVIN KAMIHAWA ASHA
Associate

KIM MUKAMI YOUNG JILIP AP
Associate

SCOTT AIKIA AIRIGO
Associate

SCOTT MURAKAMI ASHA
Associate

HONOLULU OFFICE
160 Bishop Street
4th Floor, Suite 400
Honolulu, Hawaii 96813-2884
Tel: (808) 521-2641
Fax: (808) 521-1162
E-mail: info@pbrhawaii.com

HILLO OFFICE
1111 Kalia Street
11th Floor, Suite 210
Honolulu, Hawaii 96813-2922
Tel: (808) 961-3223
Fax: (808) 961-1989

WAILUKU OFFICE
1797 Wahi Dr Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2878

Mr. Clyde W. Nāmu'ō, Administrator
State of Hawaii,
Office of Hawaiian Affairs
711 Kapi'olani Boulevard, Suite 500
Honolulu, Hawaii 96813

Attn: Ms. Heidi Gluth

**SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)**

Dear Mr. Nāmu'ō:

Thank you for your letter dated June 20, 2007 (your reference number: HRD07/2945). We acknowledge that the Office of Hawaiian Affairs has no comments to offer at this time. Please be assured that a copy of the Draft EIS will be transmitted to your office.

Thank you again for your participation in the Environmental Impact Statement process for this project.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

O:\A\282925\03\01 DR Impact-EI Kapolei\EIS\EISPN Letters\BIL-23 OHA_response.doc



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

April 10, 2007

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Thank you for the opportunity to provide comments on DR Horton's Ho'opi'i project. This project plans to add a significant number of homes in a region that has seen a great population increase in a short amount of time. However, infrastructure has not kept up with development.

I support the Ho'opi'i project only insofar as it includes plans to adequately address the issue of infrastructure including, but not limited to, roads, schools, and the water and sewer system.

While the project is in its early stages, it is imperative that the infrastructure be built concurrently and not after the construction of the housing. This project will have a great effect on the district I represent and I look forward to being able to provide further comments as the project proceeds through the various stages of development.

Once again, thank you for the opportunity to provide comments on this matter. If you have any questions, please do not hesitate to contact me.

Allyssa

Sharon E. Har
State Representative
40th House District
Kapolei, Makakilo, Royal Kunia, Kalaeloa

SEH:krm

cc: Office of Environmental Quality Control
State of Hawaii Land Use Commission

2007040207

Representative Sharon E. Har
State Capitol, Room 313 • Honolulu, Hawaii 96813
Phone: (808) 586-8500 • Fax: (808) 586-8504 • E-mail: rephar@capitol.hawaii.gov



February 9, 2008

W. FRANK BRANDT, ASIA
Chairman

THOMAS WITTEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL CHUNG, ASIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT LAIBAKAS, AKP
Principal

TOM SCHILLACI
Senior Associate

RAYMOND L. HIGA, ASIA
Senior Associate

KYVIN NIMIKAWA, ASIA
Associate

KIMI MIKAMI YUEN, LLDP/AP
Associate

SCOTT ALINA ABHIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-2484
Tel: (808) 521-5631
Fax: (808) 521-1162
E-mail: shigekuni@pbrhawaii.com

HILLO OFFICE
101 Aupuni Street
Hilo, Hawaii 96720-4322
Tel: (888) 961-2323
Fax: (888) 961-3889

WAILUKU OFFICE
2707 Wahi Dr. Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (888) 432-2878

Representative Sharon E. Har
State Capitol, Room 313
Honolulu, Hawaii 96813

SUBJECT: HO'OPI'I ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISPN)

Dear Representative Har:

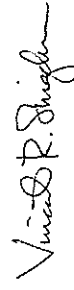
Thank you for your letter dated April 10, 2007 (your reference number: SEH:krm). Thank you for your support of the Ho'opi'i project. We acknowledge that the project will add a significant number of homes in the Ewa region. Please be assured that the project will be built out over 20 years, and as such, infrastructure including, but not limited to, roads, schools, and the water and sewer system, can be planned and installed concurrently with the construction of housing.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

0:\hnt\2003\01 DR Horton-E Kapolei\EISEISPN\Letters\SEH_16\Representative Har response.doc



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

May 7, 2007

REPLY TO
ATTENTION OF

Regulatory Branch

File No. POH-2006-233-2

Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

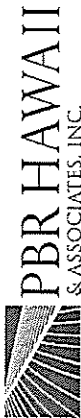
This is in response to your letter dated March 7, 2007 for comments for an environmental impact statement (EIS) for the proposed Ho'opihi development in East Kapolei, Ewa District, O'ahu Island, Hawaii, various TMKs. We have reviewed the information you submitted with respect to the Corps' authority to issue Department of the Army (DA) permits pursuant to Section 10 of the Rivers and Harbors Act (RHA) of 1899 (33 USC 403) and Section 404 of the Clean Water Act (CWA) (33 USC 1344).

Based on the information provided in the EIS preparation notice (EISPN) prepared on behalf of the applicant, D.R. Horton - Schuler, LCC, we are unable to provide a determination whether a DA permit would be required. A DA permit will be required for any work in navigable waters of the U.S. or activities that involve the placement or discharge of dredged or fill material into waters of the U.S. Please send us a copy of the draft EIS, project plans, or for review. The draft EIS should identify any water resources, including wetlands, which may be affected by the proposed project.

If you have any questions regarding this information request, please contact Ms. Joy Anamizu by phone at 808-468-7023 or by electronic mail at joy.anamizu@usace.army.mil and reference the file number above in future correspondence.

Sincerely,

George P. Young, P.E.
Chief, Regulatory Branch



February 9, 2008

W. FRANK BRANDT, ASLA
Chairman

THOMAS S. WITLEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURAKAMI, AICP
Principal

TOM SCHINELLACK
Senior Associate

RAYMOND L. HIGA, ASLA
Senior Associate

ALYSSA N. NISHIKAWA, ASLA
Associate

KIMI MIKAMI, UEN, LL.M., J.D.
Associate

SCOTT AIKIA ABRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

Mr. George P. Young, P.E.,
Chief, Regulatory Branch
U.S. Department of the Army
U.S. Army Engineer District, Honolulu
Fort Shafter, Hawaii; 96858-5440

Attn: Ms. Joy Anamizu, Regulatory Branch

SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISPN)

Dear Mr. Young:

Thank you for your letter dated May 7, 2007 (your reference number: POH-2006-233-2). We acknowledge that the U.S. Army Engineer District is unable to provide a determination whether a Department of the Army permit pursuant to Section 10 of the Rivers and Harbors Act of 1889 and Section 404 of the Clean Water Act would be required for the proposed project. An application for jurisdictional determination will be submitted to the Army Corps of Engineers. As requested, a copy of the Draft EIS, identifying any water resources, including wetlands, which may be affected by the proposed project, will be sent to the U.S. Army Engineer District for review.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc Office of Environmental Quality Control

O:\66232303.01 DR Horton-5 Kapolei\EISEISPN\Lettcr\BL-22 DA response.doc

HONOLULU OFFICE
100 Beehive Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813 3184
Tel: (808) 521-5631
Fax: (808) 521-1122
E-mail: spc@pbrhawaii.com

HILO OFFICE
1000 Wai'anae Blvd., Suite 110
1000 Wai'anae Circle, Suite 110
Hilo, Hawaii 96720-4362
Tel: (808) 943-3213
Fax: (808) 941-4659

WAILUKU OFFICE
1787 Wai'anae Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2825

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



March 27, 2007

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Your Letter Dated March 7, 2007 Regarding the
Environmental Impact Statement Preparation Notice for Ho'opili

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


We have the following comments to offer:

1. A potable and non-potable water master plan of the entire parcel should be submitted for our review and approval. The master plan should include the water requirements and proposed infrastructure facilities. The master plan should show that the facilities are able to provide water service and fire protection in accordance with our Water System Standards.
2. The developer will be required to install the necessary water system improvements to serve the proposed development. The construction drawings should also be submitted for our review and approval.

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

If you have any questions, please contact Robert Chun at 748-5440.

Very truly yours,


KEITH S. SHIDA
Principal Executive
Customer Care Division

cc: Office of Environmental Quality Control (OEQC)



February 8, 2008

W. FRANK BRADY, ASLA
Chairman

J. IRMAAN WHITES, ASLA
President

R. STAN BUNGAN, ASLA
Executive Vice-President

RUSSELL CHING, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, AICP
Principal

TOM SCINTILLI, AICP
Senior Associate

RAYMOND L. HIGA, ASLA
Senior Associate

ALYNN NISHIKAWA, ASLA
Associate

KUMIKAWA YUEN, LEED AP
Associate

SCOTT ALAKA, BIRMG
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-2884
Tel: (808) 521-5601
Fax: (808) 521-5603
E-mail: info@pbrhawaii.com

HILLO OFFICE
1161 Kalia Road
1161 Kalia, Suite 310
Hilo, Hawaii 96720-4542
Tel: (808) 941-3223
Fax: (808) 941-1689

WAILUKU OFFICE
1267 Wai Pa Loah, Suite A
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2678

Mr. Keith S. Shida, Principal Executive
Customer Care Division
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Attn: Mr. Robert Chun

**SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISP/N)**

Dear Mr. Shida:

Thank you for your letter dated March 27, 2007. We have reviewed your letter and offer the following responses to your comments:

1. A Conceptual Water Master Plan addressing potable and non-potable water facilities will be submitted to BWS for its review and approval.
2. We acknowledge that D.R. Horton or its successors will be required to install the necessary water system improvements to serve the proposed development.
3. Construction drawings will be submitted to BWS for its review and approval.
4. We acknowledge that D.R. Horton or its successors will be required to pay the BWS Water System Facility Charges for resource development and transmission.

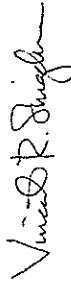
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

Mr. Keith S. Shida
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 8, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

O:\001292\503.01\VERS\EISPN Letter\BL-03.3\WS resp\msa.doc

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU

716 SOUTH KING STREET, SUITE 311 • HONOLULU, HAWAII 96813 • AREA CODE 808 • PHONE: 527-5311 • FAX: 527-6488



MUFI HANNEMANN
MAYOR

DEBORAH KIM MORIKAWA
DIRECTOR

MARK K. OTO
SENIOR ADVISOR

March 20, 2007

Mr. Vincent Shigekuni
PBR HAWAII
ASB Tower, Suite 660
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

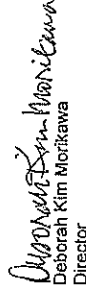
Subject: Environmental Impact Statement Preparation Notice
Ho'opili

Thank you for providing us with the opportunity to review and comment on the Ho'opili Environmental Impact Statement (EIS) Preparation Notice.

The draft EIS should provide more detailed information on the types of affordable housing that will be developed in terms of unit size, types and pricing. Our customary recommendation is to require that no less than 30 percent of the total number of dwelling units in the project must be affordable to households with incomes not exceeding 120 percent of the median income for Honolulu, and no less than 10 percent of the total number of dwelling units being affordable to households with incomes not exceeding 80 percent of the median income. 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/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 a few house lots for the development of group homes for persons with special needs. As a matter of policy, the City & County of Honolulu promotes the dispersal of housing for persons with special needs throughout the community.

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. Randy Wong at 768-7747.

Sincerely,



Deborah Kim Morikawa
Director

DKM:rg
cc: Office of Environmental Quality Control
State of Hawaii, Land Use Commission



WFRANK BRANDLHASLA
Chairman

THOMAS W. JONES, ASLA
President

R. SHANLUNGAN, ASLA
Executive Vice-President

RUSSELL CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MURKAWA, ACP
Principal

TOM KISHIJI, ACP
Senior Associate

KAYMOND HIRA, ASLA
Senior Associate

KAVIN S. SIKHAWA, ASLA
Associate

KAMUKAMI YUEN, UHDP AP
Associate

SCOTT AIKKA ABRIGO
Associate

SCOTT MURKAWA, ASLA
Associate

HONOLULU OFFICE
1021 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-2151
Tel: (808) 523-1400
Fax: (808) 523-1402
E-mail: info@pbrhawaii.com

HUO OFFICE
1011 Alameda Street
1015 Laguna Center, Suite 210
Haw. Howard W229-4162
Tel: (808) 961-3333
Fax: (808) 961-3399

WAILUKU OFFICE
1255 Wai'ia Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2676

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

660 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-6481 • Fax: (808) 523-4567
Web site: www.honolulu.gov

APR 03 2007



MURTHANNEMANN
MAYOR

EUGENE C. LEE, P.E.
DIRECTOR
CRISTY L. HOSKING, P.E.
DEPUTY DIRECTOR

April 3, 2007

SUBJECT: HO'OPIHI ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISP/N)

Ms. Deborah Kim Morikawa, Director
City & County of Honolulu
Department of Community Services
715 South King Street, Suite 311
Honolulu, Hawaii 96813

Dear Ms. Morikawa:

Thank you for your letter dated March 20, 2007. We have reviewed your letter and offer the following responses to your comments.

As noted in the EISP/N, "The Project may provide up to 11,750 residential units in a variety of housing types. D.R. Horton is aware of the current City and County of Honolulu affordable housing requirements (30 percent of the total number of units) and is prepared to price up to 30 percent of the total number of units developed on-site as affordable. In addition to home ownership opportunities, the project will provide commercial, educational, and recreational opportunities for residents."

While it is very early in the development process, with the first homes not envisioned for sale until 2012, pricing will be based on then-prevailing County rules and market conditions.

As previously noted, the project is in the planning process so there may be an opportunity to identify a few house lots throughout the proposed project for the development of group homes for persons with special needs. Thank you again for your participation in the Environmental Impact Statement process. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc Office of Environmental Quality Control

0:\001\252503\01\NEISEISP\Letters\BL-01 DCS Response.doc

Mr. Vincent Shigekuni
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement Preparation Notice
Hoopili, Oahu, Ewa

Thank you for giving us the opportunity to comment on the above project.

The Department of Design and Construction (DDC) has the following comments:

- DDC recommends that the developer meet with City officials from the Department of Planning and Permitting, Department of Design and Construction, and Department of Parks and Recreation at an early stage in the development's planning process to develop a conceptual plan for overall park development which is acceptable and appropriate.
- On page 23 of the Environmental Impact Statement Preparation Notice (EISP/N), the authors state that their proposed neighborhood parks would be one to two acres in size. Public dedicated parks of such a small size are not likely to be acceptable to the City. Although we support the goal of locating parks within walking distance of their users (up to 1/2 mile), the City's standard for public neighborhood parks is four to six acres to accommodate such land-intensive uses as ballfields, play courts, play equipment, etc. Privately built and maintained neighborhood parks of the proposed size might be acceptable for receiving credit for park dedication purposes, provided the parks are developed in an appropriate way useful to the community. The developer should also consider possibly co-locating parks adjacent to public schools.

- The proposed development borders Farrington Highway which is a transportation facility on the Oahu Regional Transportation Plan (ORTP).

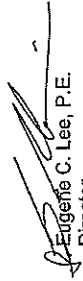
Mr. Vincent Shigekuni
Page 2
April 3, 2007

This facility has been determined to be an integral transportation facility in the Ewa Plains, and is planned for future widening between Fort Weaver Road and the proposed North-South Road; in addition, it is also identified in the MOS alignment for the Transit project. The Farrington Highway widening is an integral part of the Oahu Regional Transportation Plan and is needed to provide improved regional circulation. The Hoopi development should provide improvements to the existing Farrington Highway to accommodate the future traffic volume expected to be generated from the development.

- DDC would appreciate receiving copies of the draft and final EIS documents when published.

Should you have any questions, please contact Craig Nishimura, Deputy Director, at 768-8481.

Very truly yours,



Eugene C. Lee, P.E.
Director

ECL:lt (198758)

c: Lester Chang, Department of Parks and Recreation
Robert Sumitomo, Department of Planning and Permitting
DDC Facilities Division
DDC Civil Division
Office of Environmental Quality Control
State Land Use Commission



February 8, 2008

W. FRANK BUKANDI, ASIA
Clearman

THOMAS W. HIGGS, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL CHUNG, ASIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, ACP
Principal

TOM SCHINELL, AICP
Senior Associate

RAYMOND J. HIGA, ASIA
Senior Associate

KEVIN N. NISHIKAWA, ASIA
Associate

KIM BARKAM IYEN, LEED AP
Associate

SCOTT A. ABRIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
530 Pierson Drive, Suite 1420
Honolulu, Hawaii 96813-2834
Tel: (808) 521-5031
Fax: (808) 523-1892
E-mail: system@pbrhawaii.com

HILO OFFICE
101 Aupuni Street
Hilo, Hawaii 96720-4516
Tel: (808) 961-3233
Fax: (808) 961-3889

WAILUKU OFFICE
4797 Waihi Dr., Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2878

Mr. Eugene C. Lee, P.E., Director
Department of Design and Construction
City and County of Honolulu
650 South King Street, 11th Floor
Honolulu, Hawaii 96813

**SUBJECT: HO'OPII, ENVIRONMENTAL, IMPACT STATEMENT
PREPARATION NOTICE (BISPN)**

Dear Mr. Lee:

Thank you for your letter dated April 3, 2007. We offer the following responses to your comments:

1. The developer will meet with City officials from the Department of Planning and Permitting, Department of Design and Construction, and Department of Parks and Recreation (DPR) at an early stage in the development's planning process to develop a conceptual plan for overall park development which is acceptable and appropriate.
2. Thank you for the information on neighborhood parks. We realize that using DPR's terminology, the one to two acre parks should be described as "mini-parks", and not "neighborhood parks." We would greatly appreciate the opportunity to more fully describe our preliminary concepts for these mini-parks with you in the near future.
3. We acknowledge that the proposed development borders Farrington Hwy which is a transportation facility on the Oahu Regional Transportation Plan (ORTP), and therefore, concur that the widening of Farrington Highway is an integral part of the ORTP and is needed to provide improved regional circulation. The developer will coordinate with DDC regarding the expansion of the right-of-way for the City's planned widening of Farrington Highway, as well as improvements to the highway (such as turning lanes) which are needed to mitigate traffic that can be directly attributed to the proposed development.

4. Please be assured that DDC will be sent a copy of the Draft EIS.

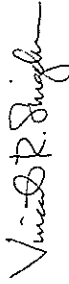
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

Mr. Eugene C. Lee
SUBJECT: HO OPII ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 8, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at
521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

0:\u005252503.01 DR Eugene E Kapohe\EISEIS\IN Letters\BL_08.DOC:response.doc

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU
1000 Uluohia Street, Suite 215, Kapa\u0101, Hawaii 96707
Phone: (808) 892-5564 • Fax: (808) 892-5857
Website: www.honolulu.gov



MUFT HANNEMANN
MAYOR

LAVERNE HIGA, P.E.
DIRECTOR AND CHIEF ENGINEER
GEORGE TEOCKIYAWAKOTO
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 07-312

April 13, 2007

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement
Preparation Notice (EISPN), Hoopili

Thank you for the opportunity to review and comment on the subject EISPN dated
January 2007.

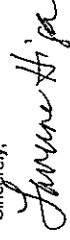
The EISPN proposes to reclassify 1,553.844 acres of land from Agricultural District to
Urban District. Future development will include a network of streets and bikeways with the required
storm drainage improvements. The City and County maintenance resources will need to be
expanded for the additional infrastructure. The Ewa region is experiencing tremendous growth
putting a strain on resources that maintain the accompanied improvements.

Accordingly, we request any future Draft Environmental Impact Statement (DEIS) include a
maintenance analysis which anticipates the labor, equipment and materials needed to maintain
the proposed infrastructure to a recognized standard.

Also, maintenance jurisdiction of the proposed bikeways should be addressed in the DEIS.
Bikeway facilities not located with dedicable roadways should be privately-owned and maintained
by the community association.

Should you have any questions, please call Charles Pignataro of the Division of Road
Maintenance, at 484-7697.

Sincerely,



Laverne Higa, P.E.
Director and Chief Engineer

cc: Office of Environmental Quality Control
State of Hawaii, Land Use Commission



February 8, 2008

WIRAKKARANDEWASA
Chairman

THOMAS WATTEN, ASHA
President

R. STANISLAN, ASHA
Executive Vice-President

RUSSELL CHUNG, ASHA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT LAURAKAHL, ACP
Principal

TOM SCINILLI, ACP
Senior Associate

RAYMOND F. HIGA, ASHA
Senior Associate

KIYUKI & SHIKAWA, ASHA
Associate

KIMIKAWAYUEN, LEED AP
Associate

SCOTT AIKAWA, BRG
Associate

SCOTT MURKAWA, ASHA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-2441
Tel: (808) 523-1492
Fax: (808) 523-1493
E-mail: awash@pbrhawaii.com

HILO OFFICE
1011 Aiea Street
Hilo Legation Center, Suite 310
Hilo, Hawaii 96720-4663
Tel: (808) 941-3132
Fax: (808) 941-3589

WAILUKU OFFICE
1257 Wai'ala Lane, Suite 4
Wailuku, Hawaii 96793-1771
Tel: (808) 242-2874

MUFI HANDEHANN
MAYOR



March 16, 2007

Mr. Vincent Shigekuni
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement Preparation Notice Ho'opili

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice for D. R. Horton's proposed Ho'opili project.

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,

LESTER K. C. CHANG
Director

LKCC:mk
(198877)

cc: Office of Environmental Quality Control
State of Hawaii, Land Use Commission

Mr. Craig Nishimura, P.E., Acting Director and Chief Engineer
City & County of Honolulu
Department of Facility Maintenance
1000 Uluohia Street, Suite 215
Kapolei, Hawaii 96707

Attn: Mr. Charles Pignataro

SUBJECT: HO'OPIILI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISPN)

Dear Mr. Nishimura:

Thank you for the letter dated April 13, 2007 (your reference number: DRM 07-312). We have reviewed your letter and offer the following responses to your comments.

- As you kindly offered, we spoke with staff at your department regarding the request for a maintenance analysis. The Draft EIS will include an economic and fiscal impact analysis that should describe the impact of the project on County resources and how anticipated revenues may or may not offset maintenance costs.
- As recommended, maintenance jurisdiction of the proposed bikeways will be addressed in the Draft EIS. Bikeway facilities not located within dedicable roadways will be privately-owned and maintained by a community association(s).

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521 5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

O:\060520203.01 DR Horton-E Kapolei\EISEIS\SN Lettma.Bi.-19 DPM responses.doc



W. IRANKIRANDI DASLA
Chairman

THOMAS W. LEWIS, AIA
President

R. SHANMUGAN, AIA
Executive Vice President

RUSSELL M. CHING, AIA
Executive Vice President

VINCENT S. SHIGEKUNI
Vice President

GRANT T. MURKIN, AICP
Principal

TOM SCHINDEL, AICP
Senior Associate

RAYMOND D. HOA, AIA
Senior Associate

MAVIN K. KASHIKAWA, AIA
Associate

KIM MIKAMAYUKI, AICP
Associate

SCOTT A. IKA, AICP
Associate

SCOTT M. KAKAMA, AIA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, HI 96813-4114
Tel: (808) 531-1411
Fax: (808) 523-1472
E-mail: opadmin@pbihs.com

HILLO OFFICE
101 Aiea Street
Hilo Laptop Center, Suite 410
Hilo, Hawaii 96720-1763
Tel: (808) 961-3158
Fax: (808) 961-1589

WAILUKU OFFICE
1001 Wai'aleale Drive
Wailuku, HI 96791-1271
Tel: (808) 242-3878

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR - HONOLULU, HAWAII 96813
TELEPHONE: (808) 525-3000 FAX: (808) 525-0723
INTERNET: www.dpp.hawaii.gov



MUF HANDEMANN
Mayor

HENRY ENG, FAICP
Director
DAVE K. MARSH
Deputy Director

2007/ELOG-658
2007/GEN-8 (TH)

May 1, 2007

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Ho'opi'i Project, Tax Map Key: 9-1-017:004 (por.),
059 and 072; 9-1-018:001 and 004; 9-1-010:002, 014 (por.),
and 015 (por.); 9-2-002:001, 9-2-002:002, 004, 005 and 007

We have reviewed the subject project and offer the following comments:

1. Section 1.0 Introduction

On Page 1 of the Introduction, one (1) of the Tax Map Key parcels listed is 9-2-02:01 (portion). However, TMK: 9-2-02:01 (portion) is not listed on Page 2, nor identified in Figures 1, 2, 2.1, 2.2, and 3. Additionally, this same parcel is not reflected in Table 1 on Page 3. If TMK: 9-2-02:01 (portion) is part of the proposed project site or Petition area, it needs to be included where appropriate in the Draft Environmental Impact Statement (DEIS). Also, please indicate the proposed uses and zoning in Table 1.

On Page 2 of the Introduction, the "Existing Zoning Designation" states that the current zoning is "AG-1 (Agricultural)". Our records indicate that certain parcels (TMK: 9-1-10:14 (portion) and 15 (portion)) within the "non-petition area" are identified as having both AG-1 Restricted Agricultural District and F-1 Military and Federal District zoning. We recommend that the DEIS reflect the following:

February 8, 2008

Mr. Lester K. C. Chang, Director
Department of Parks and Recreation
City and County of Honolulu
Kapolei Hale
1000 Ulukouia Street, Suite 309
Kapolei, Hawaii 96707

Attn: Mr. John Reid

SUBJECT: HO'OPI'I ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)

Dear Mr. Chang:

Thank you for your letter dated March 16, 2007. We acknowledge that the Department of Parks and Recreation has no comments to offer at this time.

Thank you again for your participation in the Environmental Impact Statement process for this project.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

O:\HOB\202\203.01\VEIS\VEISPN Letters\UBL_02 DPR response.doc

- Revise the term "AG-1 (Agricultural)" to "AG-1 Restricted Agricultural District."
- Provide a zoning map(s) and table to identify the zoning for all parcels (within and outside the petition area) of land. If none of the parcels are zoned F-1 Military and Federal District, then it would be helpful for the new zoning map(s) to show how the proposed parcels are not included in the F-1 areas.
- To supplement Table 1, it would be helpful to revise Section 1.4 by modifying the existing TMK maps or inserting a new map to graphically show the landowners involved.
- Land Use Ordinance (LUO). The discussion of the LUO should also indicate how much of the 1,704.265-acre project area is proposed to be rezoned.

2. Compliance with the State of Hawaii and City and County of Honolulu Environmental Laws

The DEIS should discuss how the proposed action supports the City's General Plan.

With respect to the Ewa Development Plan, we recommend that the DEIS provide graphic and narrative information on how the proposed action fulfills the policy of a network of open space and greenways (Section 2.2.3). Specifically, the DEIS should focus on how the proposal:

- Utilizes a system of linear greenbelts to connect to existing communities.
- Utilizes landscaped buffers and other forms of open space to create a separate identity for the Ho'opili community.
- Meets or exceeds the Ewa DP's minimum requirement of two (2) acres of park space per 1,000 residents
- Considers potential opportunities for co-location of parks with elementary schools; and
- Creates accessible pathways from surrounding streets to facilitate pedestrian and bicycle access to all features in parks (Section 3.3).

The DEIS should discuss how Ho'opili will implement the Ewa DP policies, principles, and guidelines pertaining to planned residential communities (Section 3.6.3); and industrial centers (Section 3.7.3).

The DEIS should provide graphic and narrative information on how the proposed action supports the Ewa DP's general policies pertaining to higher density housing along the transit corridor, transit-oriented streets and pedestrian and bicycle travel, with particular emphasis on accessibility to reach neighborhood

destinations via non-automotive modes of travel (Section 3.6.3.1). The DEIS should also address how the project conforms to the guidelines for a circulation system planned for Ho'opili and how it will be integrated with existing and future developments such as West Loch Estates, Ewa Villages, University of Hawaii (UH) West Oahu, and DLNR and DHHHL projects (Section 3.6.3.2). The discussion on circulation should be a component of the project master plan that the applicant will have to prepare as a requirement for "significant zone changes" (Section 5.4.2).

The Conceptual Land Use Map (Figure 6) shows several areas throughout the petition area proposed for business/commercial use. The DEIS should focus on how the proposed business/commercial use is consistent with the Ewa DP's general policies, planning principles, and guidelines pertaining to planned commercial centers (Section 3.7.1). This discussion should also focus on pedestrian and bicycle accessibility (Section 3.7.1.2).

The DEIS should explain how Ho'opili implements the Ewa DP's policies, principles, and guidelines for transportation systems (Section 4.1). The DEIS should focus on how the proposed action supports the development of a comprehensive roadway network and a transit-oriented community street system.

The DEIS should also provide graphic and narrative information on the planned high-capacity transit corridor, including the location of the stations planned on the North-South Road adjacent to the future UH West Oahu campus and on Farrington Highway. A park and ride facility should also be considered at one (1) of the transit stations to increase convenience, accessibility, and encourage ridership. The DEIS should explain that the City has identified Parcel B as a possible site for a maintenance facility to serve the planned high-capacity transit corridor.

The DEIS should also explain how the proposed action supports the Ewa DP's policies, principles, and guidelines pertaining to water allocation system development (Section 4.2); drainage systems (4.6); and school facilities (Section 4.7).

The Ewa DP's Open Space Map shows panoramic makai views from the H-1 Freeway across Parcel B, and views across Parcel B from Fort Weaver Road. The DEIS should discuss how the proposed action impacts these panoramic views.

The Ewa DP's Public Facilities Map shows a proposed bike path along the North-South Road. This proposed bike path should be considered in the refinement of the Conceptual Land Use Plan since it provides an important link between the proposed project and UH West Oahu, and neighboring communities.

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
Page 4
May 1, 2007

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
Page 5
May 1, 2007

Should you have any questions, please contact Tim Hata of our staff at 768-8043.

Very truly yours,



Henry Eng, FAICP, Director
Department of Planning and Permitting

HE:js

cc: OEQC
Land Use Commission

P:\DEV\Function\EA-EIS\2007\HOOP\U EIS\2007\elog\658.k.doc

3. Section 2.0 Description of the Project
The list of current tenants and existing land uses listed in Table 2, Section 2.1.2 of the EISPN should be supplemented by a map in the DEIS showing where these tenants are currently leasing land in the project area.
4. Section 3.0 Assessment of the Existing Natural Environment, Potential Impacts, and Mitigation Measures
Section 3.4, states that land leases will be withdrawn in phased and "as needed basis." We recommend that the DEIS and agricultural impact assessment report explain what will happen to these tenants after their leases are withdrawn.
Page 31, paragraph 3 states that a very small portion of parcel C is in Zone AE and X. We recommend that the applicant verify if a portion of parcel C is in Zone XS and AEF as our records indicate.
5. Section 4.0 Assessment of the Existing Human Environment, Potential Impacts and Mitigation Measures
The term "Public Transit Authority" mentioned in the last paragraph on Page 40 should be revised to "Oahu Transit Service." The Oahu Transit Service is a private company hired by the City and County of Honolulu to operate TheBus that provides public transit for Oahu, including the routes mentioned on Page 40.
The DEIS should indicate the existing flows being treated at the Honolulu Wastewater Treatment Plant (WWTP) and any improvements to the WWTP needed to accommodate future wastewater demand. The preliminary Wastewater Collection Master Plan should also include figures for wet-weather flows.
Section 4.8.4 of the EISPN mentions that the project area is within the Kaloi, Honolulu Stream, and West Loch drainage basins. It would be very helpful if a map showing these drainage basins in relation to the project area can be included in the DEIS.
Section 4.9.3 of the EISPN discusses health care and hospital facilities. We recommend that the DEIS expand this section by discussing emergency medical service resources that will be needed to serve Ho'opili. We recommend that the Department of Emergency Services be added to the list consulted parties in Section 6.0.



February 9, 2008

W FRANK BRANDELSA
Chairman

THOMAS W. PATES, ASIA
President

A. STANFORD, ASIA
Executive Vice-President

RUSSELL CHUNG, ASIA
Executive Vice-President

VINCENT SHIGIKINI
Vice-President

GRANT T. MURKAWA, AICP
Principal

TOM SCHNITZLER, AICP
Senior Associate

KAMONDT DING, ASIA
Senior Associate

KAYAN K. ANSUKAWA, ASIA
Associate

KIMIKAWA MIYUKI, AICP
Associate

SCOTT A. KAHAU, AICP
Associate

SCOTT MURKAWA, ASIA
Associate

HONOLULU OFFICE

601 BISHOP SQUARE
ASB Tower, Suite 600
Honolulu, Hawaii 96813-4341
Tel: (808) 524-1411
E-mail: asia@pbr.com

HILLO OFFICE

1105 Lapeer Court, Suite 400
Hilo, Hawaii 96720-4622
Tel: (808) 961-3333
Fax: (808) 961-1599

WAILUKU OFFICE

1295 Wai Pa I Way, Suite 4
Wailuku, Hawaii 96771-1271
Tel: (808) 252-2828

Mr. Henry Eng
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 9, 2008
Page 2

d. The Draft EIS will provide graphic and narrative information on how the proposed action supports the Ewa DP's general policies pertaining to higher density housing along the transit corridor, transit-oriented streets, and pedestrian and bicycle travel, with particular emphasis on accessibility to reach neighborhood destinations via non-automotive modes of travel (Section 3.6.3.1 of the Ewa DP). In addition, the Draft EIS will address how the project conforms to the guidelines for a circulation system planned for Ho'opili and how it will be integrated with existing and future developments (Section 5.4.2 of the Ewa DP). A project master plan which will include a transportation master plan will be prepared and included in the Zone Change permit application.

e. The Draft EIS will include discussion on how the proposed business/commercial use is consistent with Ewa DP's general policies, planning principles, guidelines pertaining to planned commercial centers (Section 3.7.1 of the Ewa DP), and pedestrian and bicycle accessibility (Section 3.7.1.2 of the Ewa DP).

f. The Draft EIS will include discussion of how the project will implement the Ewa DP's policies, principles, and guidelines for transportation systems (Section 4.1 of the Ewa DP).

g. The Draft EIS will include a map and narrative information on the planned high-capacity transit corridor, including the location of the transit stations planned on the North-South Road and Farrington Highway. D.R. Horton has been in coordination with area developers and it is our understanding that a park and ride facility is being considered at one of the transit stations closest to UHWO, the Kroc Center and Kapolei Parkway to increase convenience, accessibility, and encourage ridership. It is acknowledged that Parcel B is one of two sites along the transit corridor being considered for a potential rail maintenance and storage facility.

h. The Draft EIS will explain how the proposed action supports the Ewa DP's policies, principles and guidelines pertaining to water allocation system development (Section 4.2 of the Ewa DP), drainage systems (Section 4.6 of the Ewa DP) and school facilities (Section 4.7 of the Ewa DP).

i. The Draft EIS will include a discussion of how the proposed action impacts these panoramic views.

j. The Draft EIS will include a Conceptual Regional Public Facilities and Bikeway Master Plan for East Kapolei that was developed with UHWO and DHHL. The proposed bike path and North-South Road is shown as being integral to providing bicycle and pedestrian connectivity to planned bike and multi-modal paths within the proposed project, UHWO and DHHL.

3. Section 2.0 Description of the Project.

a. A map depicting where current tenants are currently leasing land in the project area, to serve as a supplement to Table 2, will be included in the Draft EIS.

SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)

Dear Mr. Eng:

Thank you for your letter dated May 1, 2007 [your reference number: 2007ELOG-658; 2007/GEN-8 (TH)]. We have reviewed your letter and offer the following responses to your comments.

1. Section 1.0 Introduction.

a. Please note that TMK-9-2-02:01 (portion) is not part of the proposed project site or Petition Area, and as such, revisions will be made in the Draft EIS.

b. AG-1 (Agricultural) will be revised to AG-1 Restricted Agricultural District in the Draft EIS.

c. A zoning map and table identifying the zoning for all parcels (within and outside the petition area) of land will be included in the Draft EIS.

d. A map identifying current land ownership in relation to the proposed project, will be included in the Draft EIS.

e. The Draft EIS will note that 1,555.145 acres will need to be rezoned.

2. Compliance with the State of Hawai'i and City and County of Honolulu Environmental Laws.

a. A discussion of how the proposed project supports the City's General Plan will be included in Section 5.3.1, General Plan of the Draft EIS.

b. As recommended, the Draft EIS will provide graphic and narrative information on how the proposed action fulfills the policy of a network of open space and greenways (Section 2.2.3 of the Ewa DP).

c. The Draft EIS will discuss how the project will implement the Ewa DP policies, principles, and guidelines pertaining to planned residential communities and industrial centers (Sections 3.6.3 and 3.7.3 of the Ewa DP).

Mr. Henry Eng
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 9, 2008
Page 3

4. Section 3.0 Assessment of the Existing Natural Environment.

- a. The fact that current agricultural operations will eventually have to be phased out to other locations off-site will be addressed in the agricultural impact analysis report and Draft EIS.
- b. As recommended, we have reviewed the November 20, 2000 Flood Insurance Rate Map (Number 15003C0220) and was not able to find any references to Zone AEF and XS on the entire map or the adjoining map to the south (Number 15003C0220). So unless directed otherwise, we will limit our references to flood zones A, AE, X and D.

5. Section 4.0 Assessment of the Existing Human Environment.

- a. The term "Public Transit Authority" will be revised to "Oahu Transit Services" in the Draft EIS.
- b. Based on average daily flows, the Honouliuli Wastewater Treatment Plant (WWTP) has a primary treatment capacity of 38 million gallons per day (MGD), with future plans to expand to 51 MGD. The facility has an existing flow of 27 MGD. The Ho'opili project will generate additional flow that must be treated at the Honouliuli WWTP. To mitigate the additional burden, the project will participate in the Wastewater System Facility Charge (WSFC) program and contribute funds (based on building permits) to expand the treatment plant. Preliminary contact with the City and County of Honolulu, Department of Environmental Services has indicated that the sewer system has the capacity to accommodate the Project with a build-out beginning in four to six years and ending 15 to 20 years after. The Wastewater Collection Master Plan includes figures for wet-weather flows
- c. A map depicting the Kalo'i Gulch, Honouliuli Stream, and West Loch drainage basins in relation to the project area is shown in Figure 4 of the Drainage Master Plan included as an appendix in the Draft EIS.
- d. The Draft EIS will include a discussion of emergency medical service resources that will be needed to serve the Ho'opili project. As recommended, the Department of Emergency Services will be added to the list of consulted parties.

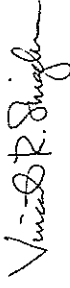
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

Mr. Henry Eng
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 9, 2008
Page 4

if you have any questions regarding this project, please do not hesitate to contact me at 521 5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc Office of Environmental Quality Control

0346282803.01 DR HAWAII EIS/EISPN Letter#BIL21 DPP response.doc

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 522-4739 • Internet: www.honolulu.gov



MUFI HANNEKAWA
MAYOR

MELVIN N. KAKU
DIRECTOR
RICHARD F. TORRES
DEPUTY DIRECTOR

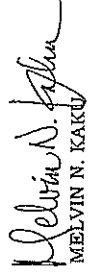
TP3/07-198732R

April 18, 2007

Mr. Vincent Shigekuni
Page 2
April 18, 2007

Should you have any questions regarding these comments, please contact
Ms. Faith Miyamoto of the Transportation Planning Division at 768-8350.

Sincerely,


MELVIN N. KAKU
Director

cc: Ms. Genevieve Salmonson
Office of Environmental Quality Control

Mr. Anthony Ching
State of Hawaii Land Use Commission

Mr. Vincent Shigekuni
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Hoopili

Thank you for your letter of March 7, 2007, requesting our review of and
comments on the Environmental Impact Statement (EIS) Preparation Notice for
the subject project.

We have the following comments for your consideration as you prepare the
draft EIS:

1. The disposition of the roadways within the project should be noted in
the document.
2. We look forward to continuing the close coordination that has occurred
between the subject project and our Honolulu High-Capacity Transit
Corridor Project.
3. The last paragraph on Page 40 of the EIS Preparation Notice describes
the existing City bus system in the project area. The second sentence
should be revised to delete the reference to the Public Transit Authority.
Also, the third sentence incorrectly states that Routes C, 93 and 93A
pass the property on Farrington Highway. These routes run on
Interstate H-1 in the vicinity of the property. Routes 40 and 40A pass
the property on Farrington Highway.



February 8, 2008

WERANKER BRANDI PARLA
Chairman

THOMAS S. WILFES, ASLA
President

R. STAN DRUCKMAN, ASLA
Executive Vice-President

RIKSHI Y. LICHING, FCSI A
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MURAKAMI, ACP
Principal

TOM SCHINELL, ACP
Senior Associate

RAMONDI THIGA, ASLA
Senior Associate

MAYUKA KASHIKAWA, ASLA
Associate

AKIHIKAMI YUEN, LEED AP
Associate

SCOTT ALIKA ARRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

KENNETH G. SILVA
FIRE CHIEF



MUFI HANSEMAN
MAYOR

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU
630 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 (Intranet: www.honolulu.gov/hfd)

March 28, 2007

Mr. Vincent Shigekuni
Vice President
PBR Hawaii & Associates, Inc.
Suite 650, American Savings Bank Tower
1001 Bishop Street
Honolulu, Hawaii 96813-3484

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement Preparation Notice
Ho'opi'i
Ewa, Oahu
Tax Map Keys: 9-1-017: 004 (portion), 059, and 072; 9-1-018: 001 and 004;
9-1-010: 002, 014 (portion), and 015 (portion); 9-2-002: 002;
9-2-002: 001 (portion), 004, 005, 006, and 007

In response to your letter dated March 7, 2007, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when the building is located more than 150 feet (45 720 mm) from a fire apparatus access road as measured by an approved route around the exterior of the building or facility. (1997 Uniform Fire Code, Section 902.2.1.)
2. Provide a water supply, approved by the county, capable of supplying 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.

SUBJECT: HO'OPI'I ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISPN)

Dear Mr. Yoshioka:

Thank you for the letter dated April 18, 2007 (your reference number: TP3/07-198732R). We have reviewed your letter and offer the following responses to your comments.

1. It is anticipated that most of the roadways within the project area will be dedicated to the City and County of Honolulu; this will be noted in the Draft EIS.
2. Please be assured that we will continue to coordinate with the Department of Transportation Services (DTS) in regards to its Honolulu High-Capacity Transit Corridor Project; specifically the alignment of the transit corridor through and the location of a transit station within the project site.
3. We appreciate your suggested revisions to page 40 of the EISPN. These revisions will be made in the Draft EIS.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521 5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni

Vincent R. Shigekuni
Vice President

cc Office of Environmental Quality Control

0A96259250A.01 DR Hirono-E Kapolei/EIS/EISPN Letters/BL_20 DTS response.doc

HONOLULU OFFICE
1401 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-3484
Tel: (808) 521-3433
Fax: (808) 521-3433
E-mail: syoshim@pbrhawaii.com

HILO OFFICE
1001
Hilo Lagoon Center, Suite 210
Hilo, Hawaii 96720-4262
Tel: (808) 961-3333
Fax: (808) 951-1999

WAILUKU OFFICE
1250 Wahi'ia Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 334-2676



February 8, 2008

W. FRANK BRANDELIASIA
Chairman

THOMAS W. FITZPATRICK
President

R. STANLEY CANNON
Executive Vice-President

RUSSELL J. CHUNG
Executive Vice-President

VINCENT SHIGEKUMI
Vice-President

GRANT MURAKAMI
Principal

TOM SCHILLACI
Senior Associate

RAYMOND T. HIGA
Senior Associate

ASHYUN M. MIKAWA
Associate

KIM ABRAHAM
Associate

SCOTT ALKA
Associate

SCOTT MURAKAMI
Associate

HONOLULU OFFICE
803 Bishop Street
4th Floor, Suite 140
Honolulu, Hawaii 96813-3484
Tel: (808) 521-7611
Fax: (808) 521-7612
E-mail: info@pbrhawaii.com

HILLO OFFICE
1161 Kapaemahu Drive
Hilo, Hawaii 96720-5262
Tel: (808) 961-3223
Fax: (808) 961-3689

WAILUKU OFFICE
1737 Wai Pu Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2825

Mr. Vincent Shigekumi
Page 2
March 28, 2007

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 723-7151.

Sincerely,

KENNETH G. SILVA
Fire Chief

KGS/SK:jl

cc: Office of Environmental Quality Control
Anthony Ching, State of Hawaii, Land Use Commission

Fire Chief Kenneth G. Silva
Honolulu Fire Department
City and County of Honolulu
636 South Street
Honolulu, Hawaii '1 96813-5007

Attn: Battalion Chief Lloyd Rogers

**SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISP)**

Dear Fire Chief Silva:

Thank you for your letter dated March 28, 2007 (your reference number: KGS/SK:jl). We offer the following responses to your comments:

1. Fire apparatus access roads shall be designed and constructed in accordance with the Uniform Fire Code, Section 902.2.1, as amended.
2. Water infrastructure shall be designed and installed in accordance with the Uniform Fire Code, Section 903.2, as amended.
3. Civil drawings will be submitted to your department for your review and approval.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekumi
Vice President

cc: Office of Environmental Quality Control

Q:\0625\2503.01 DR 1 Item 05 E Kapsel\RE\SE\SPN Letters\05 HFD response.doc

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET • HONOLULU, HAWAII 96813
TELEPHONE (808) 539-3111 • INTERNET: www.honolulu.gov



March 27, 2007

DEPUTY MAYOR

OUR REFERENCE BS-DK

Mr. Vincent Shigekuni
PBR Hawaii & Associates, Inc.
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

This is in response to your agency's letter of March 7, requesting comments on an Environmental Impact Statement Preparation Notice for the Ho'opili project in Ewa.

This project should have no unanticipated impact on the facilities or operations of the Honolulu Police Department.

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

Sincerely,
BOISSE P. CORREA
Chief of Police
By *John P. Kerr*
JOHN P. KERR
Assistant Chief of Police
Support Services Bureau

cc: OEQC
Mr. Anthony Ching, Land Use Commission

Serving and Protecting With Aloha



February 8, 2008

W. HANK BRANDLIANSA
Chairman
HIDAMA WITTEK, ASIA
President
R. STANDINGAN, ASIA
Executive Vice-President
RUSSELL CHING, ASIA
Executive Vice-President
VINCENT SHIGEKUNI
Vice-President
GRANT MURAKAMI, ACP
Principal
TOM SCHINTILLACCI
Senior Associate
RAYMOND T. HIGA, ASIA
Senior Associate
ADYINA NISHIKAWA, ASIA
Associate
KIM ARIKAWA YUEN, LL.D., AP
Associate
SCOTT ALIKA ABRIGO
Associate
SCOTT MURAKAMI, ASIA
Associate

Mr. Boisse P. Correa, Chief of Police
Police Department
City and County of Honolulu
801 South Beretania Street
Honolulu, Hawaii 'i 96813

Attn: Mr. Michael Moses/Mr. Brandon Stone

SUBJECT: HO'OPI LI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE (EISP)

Dear Mr. Correa:

Thank you for your letter dated March 27, 2007 (your reference number BS-DK). We acknowledge your assessment that the project should have no unanticipated impact on the facilities or operations of the Honolulu Police Department.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,
PBR HAWAII

Vincent R. Shigekuni

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

0:\6625292\05.01 DR-Honon-E-Kapolei\EISP\Ltrns\BL-04 IIPD response.doc

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-2881
Tel: (808) 521-5611
Fax: (808) 521-5611
E-mail: yoshidat@pbrhawaii.com

HILO OFFICE
1001 Bishop Street
10th Floor, Suite 310
Hilo, Hawaii 96720-2527
Tel: (808) 963-3223
Fax: (808) 961-3883

WAILUKU OFFICE
1297 Wailu Pt. Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2878

**COMMENTS ON HO'OPILI ENVIRONMENTAL IMPACT STATEMENT
PREPARATION NOTICE OF JANUARY 2007**

NOTE: The following comments are based on an assumption that much of the text in the subject document will be included in the EIS.

Frank Genadio
Committee for Balanced Transportation

In two places concerning open space, on pages 7 and 8, reference is made to "As much as 210 acres of parks and open space could be provided" for the project. Suggest changing of the word "could" to "will" in the Draft EIS to ensure preservation of that open space. While the use of "could" in relation to schools is understood due to uncertainties on the potential number of students, the developer's firm commitment to open space will aid efforts for rezoning of the other acreage.

References to "rail," on pages 9, 10, and 20, are premature. Bill 79, passed by the City Council for transit, refers to a "fixed guideway." Suggest change to "mass transit"—unless a (pre-EIS publication) Council decision agrees with the city that some form of rail will be used on the fixed guideway.

Concerning electrical power development (page 10), no reference is made to solar power. Photovoltaic panels on any new construction—including affordable homes—will not only ease the burden on HECO's capacity but lead to lower prices for occupants' electricity. This form of energy will surely be even more efficient by the time the first homes and facilities in Ho'opili are under development.

Figure 6 shows DLNR land and business/commercial acreage (Parcel A) on both makai sides of the H-1 North-South Interchange. The interchange is shown in a "diamond" configuration, as currently planned by the State DOT. Suggest that both DLNR and Ho'opili developers agree to leave enough open space on the mauka side of these parcels to ensure room for a future full cloverleaf interchange, a much more efficient means of freeway access that will not require the (two) traffic signals needed for the diamond configuration. Text to that effect should be included in the Major Roads description on page 23.

The title for Section 2.2.3 states "...and Preliminary Costs." Suggest removal of this portion since no costs are given—unless they are added in the Draft EIS.

The last sentence of the first paragraph on page 52 should be changed to read something like "As the first phase of the project, the City Council selected a minimum operable segment (MOS) that will be from near the southwest corner of Ho'opili up the North-South Road to Farrington Highway, through Waipahu, Pearl City, and Aiea, and via Sait Lake Boulevard through downtown Honolulu to Ala Moana Center."

This study also should acknowledge the possibility of a rail maintenance and storage yard in the development area. Two sites are under consideration for the MOS, one near Leeward Community College and the other in Parcel B. Suggest adding a sentence to the (one sentence) second paragraph on page 52, to read "If required for the transit project, space will be allocated in Parcel B for a potential rail maintenance and storage facility." (NOTE: Personal testimony given to the City Council was for extension of the western end of the MOS by about 4,000 feet makai and placement of the facility in Kalaeloa or [possibly] as an expanded facility shared with the existing Hawaiian Railway yard.)

Editing Comments (provided in case this document is used for EIS preparation):

Page	Para	Line	Comment
12	1	6	Change "have been already been" to "have already been"
20	2	8	Change "compliment St. Francis" to "complement Hawai'i Medical Center West"
21	1	1	Change "connect" to "connects"
21	3	3	Change "is proposed" to "its proposed"
35	2	1	Change "no aircrafts" to "no aircraft"
43	6	1	Change "located the" to "located at the"
45	2	2	Change "of 6,600" to "6,600"
46	4	2	Change "Navy see" to "Navy to see"
47	4	3	The sentence starting with "However..five.." should be changed to read "The project will include as many as five..."
51	2	2	Change "23-mile" to "28-mile"
52	4	3	Change "Council has select" to "Council has selected"
52	5	5	Change "in residents" to "in which residents"
52	5	9	Change "Kapolei develops" to "Kapolei develop"



Mr. Frank Genadio
 SUBJECT: HO'OPIILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
 NOTICE (EISPN)
 February 8, 2008
 Page 2

February 8, 2008

WFRANK BRANDELL PASLA
 Chairman

THOMAS W. LITEN, AIA
 President

R. SAKUNA SAKUNA, AIA
 Executive Vice President

RUSSELL Y. CHUNG, FASIA
 Executive Vice President

VINCENT SHIGEKUNI
 Vice President

GRANT EMURKAKAHU, ACP
 Principal

TOM SCINHLI, ACP
 Senior Associate

KAYMONTE IJIGA, AIA
 Senior Associate

MAVIN K. KIMURA, AIA
 Associate

MIMI MIKAMI YUEN, LEED AP
 Associate

SCOTT ALANA AIRIGO
 Associate

SCOTT MURAKAMI, AIA
 Associate

HONOLULU OFFICE
 1401 Fifth St., Suite 400
 ASB Tower, Suite 400
 Honolulu, Hawaii 96812-2451
 Tel: (808) 522-1472
 Fax: (808) 522-1472
 E-mail: ays@pbr.com; pbrhawaii.com

HILO OFFICE
 103 Aupuni Street
 Hilo Logistics Center, Suite 410
 Hilo, Hawaii 96720-1212
 Tel: (808) 963-3342
 Fax: (808) 961-0389

WAILUKU OFFICE
 1205 Wailuku Rd., Suite 1
 Wailuku, Hawaii 96793-1157
 Tel: (808) 742-3578

Mr. Frank Genadio
 Committee for Balanced Transportation
 92-1370 Kikaha Street
 Kapolei, Hawaii 'i 96707

SUBJECT: HO'OPIILI ENVIRONMENTAL IMPACT STATEMENT
 PREPARATION NOTICE (EISPN)

Dear Mr. Genadio:

Thank you for your letter received March 31, 2007. We offer the following responses to your comments:

1. We appreciate your suggested revisions to pages 7 and 8 of the EISPN, but planning for this project is in its infancy and between now and zoning there may be requests for more land set asides for the roadway improvements (such as the proposed East-West Connector) or additional school sites which were not originally envisioned. These public land set asides would have to come out of the land area currently set aside for parks and open space.

2. We appreciate your suggested revisions to pages 9, 10, and 20 of the EISPN. References to "rail" will be replaced with "mass transit" in the Draft EIS.

3. Current plans for the development of Ho'opiili include both energy efficient design and the use of electricity to be developed and sold by Hawaiian Electric Company (which itself is exploring non-oil dependent sources of energy), and as such, the project will be suited for the use of renewable energy technologies including photovoltaics.

4. We acknowledge your concern regarding the configuration of the H-1 North-South Interchange, please be assured that the developer will continue to coordinate with the State Department of Transportation to ensure that the interchange will be properly planned. As we recently learned from a presentation by the State DOT Highways Division, a full, cloverleaf interchange was studied, and it was determined that there was not enough land area between H-1 and Farrington Highway.

5. As required by Chapter 343, *Hawaii Revised Statutes*, the Draft EIS is required to include a description of the "Phasing and timing of action." An expanded discussion regarding "Project Developed Timetable and Preliminary Costs" associated with the project will be included in the Draft EIS.

6. The Draft EIS will include the following:

For the first phase of the transit project, the City Council selected a minimum operable segment (MOS) that will start near the southwest corner of the Ho'opiili project and proceed up along the North-South Road to Farrington Highway, navigating toward the direction of Waipahu, Pearl City, and Aiea, and traversing to Salt Lake Boulevard en route for downtown Honolulu to Ala Moana Center. As of this writing, we understand that the portion of the alignment between the Kroc Center and Waipahu may be subject to change.

7. The Draft EIS will include the following:

If required for the transit project, the developer will coordinate with DTS regarding the possibility of allocating a portion of the project lands for a potential mass transit maintenance and storage facility.

8. Thank you for pointing out the minor editing errors in the EISPN. These revisions will be made in the Draft EIS.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni

Vincent R. Shigekuni
 Vice President

cc: Office of Environmental Quality Control

O:\06\05\0503\01 DR Linton-F.Kapolei\EIS\EISPN Letters\BL-06 Frank Genadio response.doc



HASEKO (Ewa), Inc.

April 9, 2007

Mr. Robert Bruhl
D.R. Horton - Schuler Division
828 Fort Street Mall, 4th floor
Honolulu, Hawaii 96813

Re: Ho'opili Environmental Impact Statement Preparation Notice ("EISP")

Dear Mr. Bruhl:

Thank you for this opportunity to submit comments during the EIS scoping period for your exciting and vibrant Ho'opili project. According to the EISP, approximately 100 acres of the Ho'opili project will be within the Kalo'i Gulch Watershed instead of the 300 acres that was originally anticipated. Because Ocean Pointe and Oneula Beach Park lies at the seaward terminus of the Kalo'i Gulch Watershed, we are particularly interested in the potential drainage impacts of this and other projects within the watershed.

We concur with the EISP that, for project lands within the Kalo'i Gulch Drainage Basin, on-site detention basins will be constructed to collect stormwater runoff and discharge the flow at a rate that will not exceed pre-development conditions. We appreciate the EISP's inclusion of the current discharge restrictions for landowners and developers in the Kalo'i Gulch Drainage Basin and the acknowledgment that these existing physical restrictions will remain in place until the flow capacity of the drainage channel is increased by construction of a permanent ocean outlet.

In order for the region's flood control plans to be effective, all developers in the watershed need to cooperate, participate and contribute to efforts to address issues such as on-site detention and retention of stormwater flows to control runoff volume.

We look forward to continuing participation by you and the other developers in the watershed as we collectively move forward on resolving this major regional issue.

Thank you for this opportunity to comment on your EISP.

Very truly yours,

Nancy Maeda
Executive Vice President

91-1001 Kaimalie Street, Suite 205 • Ewa Beach, Hawaii 96706-5005
Telephone (808) 689-7772 • Fax (808) 689-5757



February 8, 2008

WIRANKIRANDI LASHA
Creative

THOMAS WITTEN, AIA
President

R-STAN DYKMAN, AIA
Executive Vice-President

RUSSELL LOHNG, FCSI, A
Executive Vice-President

YVES TSHIGEKUNI
Vice-President

GRANT MUKAKAMI, AICP
Principal

TOM SCHINELL, ACP
Senior Associate

KARONNY L. HIGA, AIA
Senior Associate

MAVIN N. NDIHAWA, AIA
Associate

KIM MURAMI YUN, LUD, AIP
Associate

SCOTT AJINA ABRIGO
Associate

SCOTT MUKAKAMI, AIA
Associate

Ms. Nancy Maeda, Executive Vice President
HASEKO (Ewa), Inc.
91-1001 Kaimalie Street, Suite 205
Ewa Beach, Hawaii 96706-5005

SUBJECT: HO'OPI LI ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISP)

Dear Ms. Maeda:

Thank you for your letter dated April 9, 2007. We acknowledge your interest in the potential drainage impact of the Ho'opili project and other projects within the Kalo'i Gulch Watershed. With respect to this portion of the project, on-site drainage basins will be constructed to collect all storm water runoff and discharge the flow at a rate that will not exceed pre-development conditions. Please note that we will continue to coordinate with the City and County of Honolulu and the State Department of Transportation to discuss issues within the Kalo'i Gulch Watershed. A Drainage Master Plan will be prepared and included in the Draft Environmental Impact Statement (EIS) for the project.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Office of Environmental Quality Control

HONOLULU OFFICE
450 Throckmorton Street
Honolulu, Hawaii 96813-3184
Tel: (808) 521-5631
Fax: (808) 521-1822
E-mail: ysp@pbrinc.com

HILLO OFFICE
101 Alapai Street
Honolulu, Hawaii 96813-3110
Tel: (808) 982-2542
Fax: (808) 941-4587

WAILUKU OFFICE
1767 Wai'ala Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 342-2823

04/06/2008 09:01 DR Horton-B Espoide\NEISE\SPN Letters\BL-15\haseko_response.doc

EIS



October 5, 2007

Mr. Vincent Shigekuni
PBR Hawaii & Associates, Inc.
ASB Tower - Suite 650
1001 Bishop Street
Honolulu, HI 96813-3484

Dear Mr. Shigekuni:

Re: **Ho'opili
East Kapolei, Ewa, Oahu**

Thank you for the opportunity to comment on the above-referenced project. We apologize for this late response.

HECO has no objections at this time. The following comments were received from various divisions of our Engineering Department:

(1) HECO has the following existing facilities within the project area that will require continued access for maintenance purposes:

- (a) Transmission & Distribution - Overhead sub-transmission and distribution lines supplying Parcel F1; overhead transmission and distribution facilities within Parcel B; overhead facilities surrounding Parcels A, B, C and D; and
- (b) Transmission Substation - Substation facilities, mainly within Parcel B;
- (c) Telecommunications - Overhead fiber optic cable facilities, mainly within Parcels B and C;

We appreciate your efforts to keep us apprised of the planning process and reserve the opportunity to further comment on the protection of existing power facilities and lines, as well as easements, that may be affected by the project. As the project progresses, please continue to keep us informed. We will be better able to evaluate any effects on our system facilities further along in the project's development. We request that development plans show all affected HECO facilities, and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.

Mr. Vincent Shigekuni
October 5, 2007
Page Two

- (2) Our Distribution Planning Division/Project Management has determined that to serve the ultimate load for the proposed development, three distribution substations, including power lines to and from them, will be needed. Installation of the substations and power lines will require Public Utilities Commission approval, as well other applicable state and city as approvals and permits. We request that these substations be included as part of the draft EIS.
- (3) Should it become necessary to relocate HECO's facilities, please immediately submit a request in writing and we will work with you so that construction of the project may proceed as smoothly as possible. Please note that there may be costs associated with any relocation work, and that such costs may be borne by the requestor. Because any redesign or relocation of HECO's facilities may cause lengthy delays, upon determination that HECO facilities will need to be relocated, HECO should be notified immediately in order to minimize any delays in or impacts on the project schedule.
- (4) Electrical Power Development, page 10. Please revise the available generation capacity (peak demand) from 1,669 MW to "1,687 megawatts (Gross MW)."

I suggest dealing directly with the following Engineering division contacts to coordinate HECO's continuing input in this project:

- Transmission & Distribution - Michael Lum (543-7030)
- Transmission Substation - Hope Hamada (543-7216)
- Telecommunications - Terrine Uehira (543-7084)
- Distribution Planning/Project Mgt - Kerstan Wong (543-7059)

Sincerely,

Kirk S. Tomita
Senior Environmental Scientist

- cc: OEQC
Anthony Ching/LUC
M. Lum
H. Hamada
T. Uehira
K. Wong





February 8, 2008

WEIKANG BRANDT DASHA
Chairman

THOMAS W. HELEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice President

RUSSELL Y. CHUNG, USA
Executive Vice President

VINCENT S. HIGGINS
Vice President

GRANT EMURKAKAMIA, ACP
Principal

TOMI SCHILLI, ACP
Senior Associate

RAYMOND F. HIGA, ASIA
Senior Associate

MIYUKI NISHIKAWA, ASIA
Associate

KIMI MURAHIMUEN, JLD/AF
Associate

SCOTT ALKA ABRIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
1401 Bishop Street
ASB Tower, Suite 600
Honolulu, Hawaii 96814-3851
Tel: (808) 524-1100
Tel: (808) 524-1102
E-mail: info@pbrhawaii.com

HILO OFFICE
101
Hilo, Hawaii 96720-4313
Tel: (808) 961-3133
Fax: (808) 961-1599

WAILUKU OFFICE
155 Wailuku Road, Suite 4
Wailuku, Hawaii 96731-1271
Tel: (808) 332-2578

Mr. Kirk S. Tomita
SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)
February 8, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekeuni
Vice President

cc: Office of Environmental Quality Control

O:\hs\252503.01 DR Hironori Kariyai\HIS\ISPN Letter\01-24 HECO response.doc

SUBJECT: HO'OPILI ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISPN)

Dear Mr. Tomita:

Thank you for your letter dated October 5, 2007. We acknowledge that the Hawaiian Electric Company, Inc (HECO) has no objections to the project at this time. We have reviewed your letter and offer the following responses to your comments.

1. The Draft EIS will note that existing HECO facilities are located within the project area. Should HECO have to tend to existing facilities within the project area, the Petitioner will allow continued access to HECO for maintenance purposes. Pre-final development plans will be forwarded to HECO for review.
2. We acknowledge your assessment that three distribution substations will be needed to serve the ultimate load for the project, including power lines extending out from the substations. In addition, the installation of power lines and substations will require approval by the State Public Utilities Commission, as well as other applicable State and City approvals and permits. The approximate location of these substations will be included in the Draft EIS.
3. Should the project's development require the relocation of HECO's facilities, the Petitioner will notify HECO immediately in order to minimize any delays in or impacts on the project schedule.
4. Please note that the available generation capacity (peak demand) of approximately "1,669 megawatts (MW)," will be revised to "1,687 megawatts (Gross MW)" in the Draft EIS.

We appreciate your suggestion to deal directly with HECO's engineering divisions to coordinate continuing input in the project. Thank you again for your participation in the Environmental Impact Statement process for this project.



February 8, 2008

WIKI KAI BRAND/LEANA
Chairman

HONAMA WITTEN/ASA
President

R. STANLEY/ASA
Executive Vice-President

RUSSELL YU/ASA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURKAM/ASA
Principal

TOMACHIN/ASA
Senior Associate

RAYMOND THIGA/ASA
Senior Associate

KEVIN KASHIKAWA/ASA
Associate

KAMUKAMU YUEN/ASA
Associate

SCOTT ALIHA/ASA
Associate

SCOTT MURKAM/ASA
Associate

HONOLULU OFFICE
101 Bishop Street,
5th Floor, Suite 500
Honolulu, Hawaii 96813-3884
Tel: (808) 521-2601
Fax: (808) 521-1822
E-mail: info@pbrhawaii.com

HILO OFFICE
144 Alapai Street,
Suite 210
Hilo, Hawaii 96720-4542
Tel: (808) 961-3123
Fax: (808) 961-1853

WAILUKU OFFICE
1297 Wailuku Road, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 542-2878

Ms. Jill Z. Lee, Section Manager
OSP Engineering, Oahu
Hawaiian Telecom
P.O. Box 2200
Honolulu, Hawaii 96841

Attn: Mr. Cliff Anguay

SUBJECT: HO'OPIHI ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE (EISPN)

Dear Ms. Lee:

Thank you for your letter received April 2, 2007. We offer the following responses to your comments:

1. We acknowledge your assessment that providing telephone service should not negatively impact the environment within the project area.
2. We acknowledge that the road widening of Farrington Highway will affect Hawaiian Telecom facilities along Farrington Highway, and therefore, will require further review during the design stages of the project to determine the scope of work and the associated relocation costs.
3. All electrical work shall conform to all electrical codes.
4. Electrical drawings of the project will be submitted to Hawaiian Telecom for review and approval before the start of construction.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comments will be included in the Draft EIS.

APR 9 2008

.....

Hawaiian Telecom
April 2, 2007

PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Attention: Mr. Vincent Shigekuni

Dear Mr. Shigekuni:

Subject: Environmental Impact Statement Preparation Notice (EISPN) for Ho'opihi, Ewa, Oahu, TMK: 9-1-17-04 (portion), 59, and 72; 9-1-18:01 and 04; 9-1-10: 02, 14 (portion), and 15 (portion) and 9-2-02:02, and 9-2-02:01 (portion), 04, 05, 06, and 07.

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice (EISPN) in accordance to Hawaii Revised Statutes, Chapter 343 and Administrative Rules, Title 11, Chapter 200 for Ho'opihi with transmittal dated March 7, 2007.

We have the following comments to make:

- As far as Hawaiian Telecom is concerned, providing telephone service should not negatively impact the environment within the project area.
- Hawaiian Telecom has aerial and underground facilities along Farrington Hwy that will be affected by the road widening of Farrington Hwy. Further review is required by Hawaiian Telecom during the design stages of the project to determine the scope of work and the associated relocation costs.
- All electrical work shall conform to all electrical codes.
- Hawaiian Telecom requires electrical drawings of the project to be submitted for our review and approval before construction starts.

If you have any questions, please contact Cliff Anguay at 840-2989.

Sincerely,

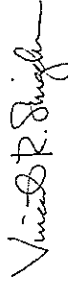
Jill Z. Lee
Section Manager
OSP Engineering, Oahu

Ms. Jill Z. Lee
SUBJECT: HO'OPII ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE (EISP)
February 8, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigeckami
Vice President

cc: Office of Environmental Quality Control

O:\06\255503.01 DR_Honolulu_Kapolei\EISP\N Letters\BL-10 Hawaiian Telecom response.doc

13.0

Comments on the Draft Environmental Impact Statement & Responses

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

13.0 COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND RESPONSES

The Ho'opili Draft Environmental Impact Statement was sent to the following agencies, organizations and individuals. The public comment period on the Draft EIS was from February 23, 2008 to April 8, 2008. Agencies, organizations, or individuals that submitted comments on the Draft EIS are listed in bold.

Table 13.1. DEIS Comment Letters

	<u>AGENCY</u>	<u>DEIS MAIL DATE</u>	<u>DATE OF COMMENTS</u>
STATE			
<u>1</u>	<u>Department of Agriculture</u>	<u>02-20-08</u>	<u>04-08-08</u>
<u>2</u>	<u>Department of Accounting & General Services</u>	<u>02-20-08</u>	<u>03-06-08</u>
<u>3</u>	<u>Department of Business, Economic Development and Tourism</u>	<u>02-20-08</u>	<u>04-08-08</u>
<u>4</u>	<u>Department of Business, Economic Development and Tourism – Energy, Resources & Technology Division</u>	<u>02-20-08</u>	--
<u>5</u>	<u>Department of Business, Economic Development and Tourism – Land Use Commission</u>	<u>02-20-08</u>	<u>03-27-08</u>
<u>6</u>	<u>Department of Business, Economic Development and Tourism – Office of Planning</u>	<u>02-20-08</u>	<u>04-08-08</u>
<u>7</u>	<u>Department of Defense</u>	<u>02-20-08</u>	<u>03-31-08</u>
<u>8</u>	<u>Department of Education</u>	<u>02-20-08</u>	<u>04-03-08</u>
<u>9</u>	<u>Department of Hawaiian Home Lands</u>	<u>02-20-08</u>	<u>04-15-08</u>
<u>10</u>	<u>Department of Health – Environmental Planning Office</u>	<u>02-20-08</u>	<u>04-02-08</u>
<u>11</u>	<u>Department of Health – Environmental Planning Office (Memo from the Hazard Evaluation & Emergency Response Office)</u>	--	<u>03-13-08</u>
<u>12</u>	<u>Department of Health – Office of Environmental Quality Control</u>	<u>02-20-08</u>	--
<u>13</u>	<u>Department of Land and Natural Resources</u>	<u>02-20-08</u>	<u>04-03-08, 04-11-08</u>
<u>14</u>	<u>Department of Land and Natural Resources – Historic Preservation Division</u>	<u>02-20-08</u>	--
<u>15</u>	<u>Department of Transportation</u>	<u>02-20-08</u>	<u>04-07-08</u>
<u>16</u>	<u>Hawaii Housing Finance & Development Corporation</u>	<u>03-03-08</u>	--

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

<u>AGENCY</u>		<u>DEIS MAIL DATE</u>	<u>DATE OF COMMENTS</u>
<u>17</u>	<u>Hawaii Community Development Authority</u>	<u>02-20-08</u>	<u>04-07-08</u>
<u>18</u>	<u>Office of Hawaiian Affairs</u>	<u>02-20-08</u>	<u>04-17-08</u>
<u>19</u>	<u>State Legislature – Representative Sharon Har</u>	<u>02-20-08</u>	<u>--</u>
<u>20</u>	<u>State Legislature – Representative Maile Shimabukuro</u>	<u>--</u>	<u>04-08-08</u>
<u>21</u>	<u>State Legislature – Representative Rida Cabanilla</u>	<u>--</u>	<u>03-12-08</u>
<u>22</u>	<u>State Legislature – Senator Will Espero</u>	<u>02-20-08</u>	<u>--</u>
<u>23</u>	<u>State Legislature – Senator Mike Gabbard</u>	<u>02-20-08</u>	<u>--</u>
<u>24</u>	<u>State Legislature – Senator Clarence Nishihara</u>	<u>02-20-08</u>	<u>--</u>
<u>25</u>	<u>University of Hawai'i – Environmental Center</u>	<u>02-20-08</u>	<u>04-08-08</u>
<u>26</u>	<u>University of Hawai'i – Water Resources Research Center</u>	<u>02-20-08</u>	<u>--</u>
<u>27</u>	<u>University of Hawai'i – Center for Smart Building and Community Design</u>	<u>02-20-08</u>	<u>--</u>
<u>28</u>	<u>University of Hawai'i – Sea Grant</u>	<u>02-20-08</u>	<u>--</u>
<u>29</u>	<u>University of Hawai'i – West O'ahu</u>	<u>02-20-08</u>	<u>04-08-08</u>
<u>30</u>	<u>Hawai'i State Library</u>	<u>02-20-08</u>	<u>--</u>
<u>31</u>	<u>'Ewa Beach Public and School Library</u>	<u>02-20-08</u>	<u>--</u>
<u>32</u>	<u>Kapolei Public Library</u>	<u>02-20-08</u>	<u>--</u>
<u>33</u>	<u>Waipahu Public Library</u>	<u>02-20-08</u>	<u>--</u>
<u>34</u>	<u>Kaimukī Regional Library</u>	<u>02-20-08</u>	<u>--</u>
<u>35</u>	<u>Kāne'ohe Regional Library</u>	<u>02-20-08</u>	<u>--</u>
<u>36</u>	<u>Pearl City Regional Library</u>	<u>02-20-08</u>	<u>--</u>
<u>37</u>	<u>Līhu'e Regional Library</u>	<u>02-25-08</u>	<u>--</u>
<u>38</u>	<u>Hilo Regional Library</u>	<u>02-25-08</u>	<u>--</u>
<u>39</u>	<u>Kahului Regional Library</u>	<u>02-25-08</u>	<u>--</u>
<u>40</u>	<u>University of Hawai'i – Hamilton Library</u>	<u>02-20-08</u>	<u>--</u>
<u>41</u>	<u>Department of Business, Economic Development and Tourism Library</u>	<u>02-20-08</u>	<u>--</u>
<u>42</u>	<u>Legislative Reference Bureau</u>	<u>02-20-08</u>	<u>--</u>
<u>43</u>	<u>City and County of Honolulu Department of Customer Services Library (formerly the Municipal Reference and Records Center)</u>	<u>02-20-08</u>	<u>--</u>
FEDERAL			
<u>44</u>	<u>Department of the Army – Army Engineer District</u>	<u>02-20-08</u>	<u>--</u>
<u>45</u>	<u>Department of the Interior – Fish and Wildlife Service</u>	<u>02-20-08</u>	<u>04-08-08</u>
<u>46</u>	<u>Department of the Navy</u>	<u>02-20-08</u>	<u>--</u>
CITY AND COUNTY OF HONOLULU			
<u>47</u>	<u>Board of Water Supply</u>	<u>02-20-08</u>	<u>03-06-08</u>
<u>48</u>	<u>City Council – Councilmember Todd Apo</u>	<u>02-20-08</u>	<u>--</u>
<u>49</u>	<u>City Council – Councilmember Nestor Garcia</u>	<u>02-20-08</u>	<u>--</u>

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

<u>AGENCY</u>	<u>DEIS MAIL DATE</u>	<u>DATE OF COMMENTS</u>
50 <u>Department of Community Services</u>	<u>02-20-08</u>	<u>03-06-08</u>
51 <u>Department of Design and Construction</u>	<u>02-20-08</u>	--
52 <u>Department of Environmental Services</u>	<u>02-20-08</u>	--
53 <u>Department of Facility Maintenance</u>	<u>02-20-08</u>	<u>04-07-08</u>
54 <u>Department of Parks and Recreation</u>	<u>02-20-08</u>	<u>03-07-08</u>
55 <u>Department of Planning and Permitting</u>	<u>02-20-08</u>	<u>04-07-08</u>
56 <u>Department of Transportation Services</u>	<u>02-20-08</u>	--
57 <u>'Ewa Neighborhood Board, No. 23</u>	<u>02-20-08</u>	--
58 <u>Fire Department</u>	<u>02-20-08</u>	<u>03-12-08</u>
59 <u>Makakilo/Kapolei Neighborhood Board, No. 34</u>	<u>02-20-08</u>	--
60 <u>Police Department</u>	<u>02-20-08</u>	<u>03-05-08</u>
61 <u>Waipahu Neighborhood Board, No. 22</u>	<u>02-20-08</u>	--
OTHER ORGANIZATIONS/INDIVIDUALS		
62 <u>Honolulu Advertiser</u>	<u>02-20-08</u>	--
63 <u>Honolulu Star Bulletin</u>	<u>02-20-08</u>	--
64 <u>Pacific Business News</u>	<u>02-20-08</u>	--
65 <u>Salvation Army</u>	<u>02-20-08</u>	--
66 <u>Hawaiian Electric Company, Inc.</u>	<u>02-20-08</u>	<u>04-28-08</u>
67 <u>Hawaiian Telcom</u>	<u>02-20-08</u>	--
68 <u>Enterprise Honolulu</u>	<u>02-20-08</u>	--
69 <u>Steve Kelly (City of Kapolei/Kapolei Property Development LLC.)</u>	<u>02-20-08</u>	<u>04-08-08</u>
70 <u>HASEKO (Ewa), Inc.</u>	--	<u>04-14-08</u>
71 <u>Leeward – Central Community Roundtable (aka Leeward – Central Community Forum)</u>	--	<u>04-07-08</u>
72 <u>Tom Berg</u>	--	<u>03-27-08</u>
73 <u>Tesha Malama</u>	--	<u>04-08-08</u>
74 <u>Agnes Patopan</u>	--	<u>04-09-08</u>
75 <u>Al Chock</u>	--	<u>04-03-08</u>
76 <u>Johnnie-Mae Perry</u>	--	<u>04-08-08</u>
<i>Agricultural Tenants</i>		
77 <u>Frank Law (Fat Law's Farm Inc.)</u>	<u>02-20-08</u>	--
78 <u>Aloun Farm, Inc.</u>	<u>02-20-08</u>	<u>04-01-08</u>
79 <u>Sugarland Farms, Inc.</u>	<u>02-20-08</u>	--
80 <u>Rocker G Livestock</u>	<u>02-20-08</u>	--
81 <u>Syngenta Seeds, Inc.</u>	<u>02-20-08</u>	--
82 <u>Yoshikawa Farms</u>	<u>02-20-08</u>	--
<i>Ho'opili Task Force Members</i>		
83 <u>Maureen Andrade</u>	<u>02-20-08</u>	--
84 <u>Gary Bautista</u>	<u>02-20-08</u>	--
85 <u>Dick Beamer</u>	<u>02-20-08</u>	--
86 <u>Scott Belford</u>	<u>02-20-08</u>	--

HO'OPILI

DRAFT FINAL ENVIRONMENTAL IMPACT STATEMENT

	<u>AGENCY</u>	<u>DEIS MAIL DATE</u>	<u>DATE OF COMMENTS</u>
<u>87</u>	<u>Kurt Fevella</u>	<u>02-20-08</u>	<u>--</u>
<u>88</u>	<u>Pearlyn Fukuba</u>	<u>02-20-08</u>	<u>--</u>
<u>89</u>	<u>Frank Genadio</u>	<u>02-20-08</u>	<u>--</u>
<u>90</u>	<u>Michael Golojuch</u>	<u>02-20-08</u>	<u>--</u>
<u>91</u>	<u>Richard Hargrave</u>	<u>02-20-08</u>	<u>--</u>
<u>92</u>	<u>Coby Lynn</u>	<u>02-20-08</u>	<u>--</u>
<u>93</u>	<u>Richard Oshiro</u>	<u>02-20-08</u>	<u>--</u>
<u>94</u>	<u>Rodolpho Ramos</u>	<u>02-20-08</u>	<u>--</u>
<u>95</u>	<u>Frances Rivero</u>	<u>02-20-08</u>	<u>--</u>
<u>96</u>	<u>Ross Rolirad</u>	<u>02-20-08</u>	<u>--</u>
<u>97</u>	<u>Georgette Stevens</u>	<u>02-20-08</u>	<u>--</u>
<u>98</u>	<u>Summer Thomson</u>	<u>02-20-08</u>	<u>--</u>
<u>99</u>	<u>Maeda Timson</u>	<u>02-20-08</u>	<u>--</u>
<u>100</u>	<u>Karen Wenke</u>	<u>02-20-08</u>	<u>--</u>
<u>101</u>	<u>Chuck Wheatly</u>	<u>02-20-08</u>	<u>--</u>
<u>102</u>	<u>Lance Widner</u>	<u>02-20-08</u>	<u>--</u>
<u>103</u>	<u>George Yakowenko</u>	<u>02-20-08</u>	<u>--</u>
<u>104</u>	<u>Linda Young</u>	<u>02-20-08</u>	<u>--</u>

O:\Job25\2503.01 DR Horton-E Kapolei\EIS\Final EIS\FEIS-02.doc

LINDA LINGLE
Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 Fax: (808) 973-9613
April 8, 2008

SANDRA LEE KUMIMOTO
Chairperson, Board of Agriculture
DUANE K. OKAMOTO
Deputy to the Chairperson

Mr. Vincent Shigekuni
April 8, 2008
Page -2-

in the Ewa Development Plan and Central Oahu Sustainable Communities Plan remain in agriculture.

There are four farming operations that are leased or licensed to occupy nearly the entire project site -- Aloun Farms (1,000 acres of which 301 are planted), Fat Law's Farm (100 acres of which 80 are planted), Sugarland Farms (197 acres of which 64 are planted), and Syngenta Seeds (200 acres of which 59 are planted).

We find the Agricultural Impact Analysis (AIA) to be very comprehensive and detailed in its description and analysis, but underplays the impact on agriculture by comparing to statewide rather than Oahu parameters. We recommend the full impact of the loss of productive agricultural use of the project site found throughout Volume 1 of the DEIS be discussed from an Oahu rather than statewide perspective as the primary market for most of the agricultural production is on Oahu. For instance, the 1,497 acres of leased agricultural land in the project site is 13.7% of the 10,900 acres of farm land said to be available on Oahu (3,150 acres in Kunia and 7,750 acres in the North Shore - Appendix A, page ES-5, section 9-b). The \$6 million in farmgate revenues is about 4.4% of Oahu 15.4% of the farmgate value of vegetables and melons produced on Oahu (ibid., page 11). The farm worker employment of 77 people represents about 3.7% of all the farm workers on Oahu (ibid., page 87).

Timely relocation of farms and related assets to new production areas is important to minimize the impact of the project on agriculture in general and maintain the availability of a significant supply of fresh food for Oahu. We note that the "...petitioner continues to work on the eventual relocation of the largest tenant, Aloun Farm, Inc., to other farm areas in Central Oahu and the North Shore..." (DEIS Volume 1, page 30). We recommend that the EIS disclose and the Land Use Commission consider requiring meaningful relocation assistance be given to all affected farming operations. Furthermore, the importance of phased development and allowing cultivation of these lands up until the last possible moment is important and should be made a condition of approval by the Land Use Commission, given the 21-year build-out period and the importance of the production in the area to supplying Oahu's demand for fresh fruits and vegetables. Aloun Farms has vacuum cooling and packing facilities, these assets and those of the other farming operations should be described in the EIS and considered as part of the cost of relocation, particularly if they are fixed (immobile) assets. The lower-than-market land rents (ranging from \$194 to \$630 per acre/year) and irrigation water (pumped groundwater) will be difficult to match elsewhere, and as noted in the report, the primary source of irrigation water for the North Shore agricultural lands is contaminated with sub-standard treated effluent and until R-1 effluent standard can be achieved, cannot be used on directly edible crops (AIA, pages 29-30). In summary, farm relocation is likely to be expensive and time-consuming, even with the business-tested skills of the affected farmers.

FACSIMILE TRANSMITTAL (3 pages) 523-1402

Mr. Vincent Shigekuni
Vice President
PBR Hawaii
ABS Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Draft Environmental Impact Statement (DEIS)
Hoopili (D.R. Horton - Schuler Homes)
TMK: 9-1-17: por. 4, 59, 72
9-1-18: 1, 4
Area: 1,553.884 acres

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

The proposed development will require the reclassification of the entire project area from the Agricultural Lands, pursuant to Chapter 205, Hawaii Revised Statutes. The Department of Agriculture acknowledges, however, that for many years the City has designated the project site and the balance of the Ewa plain for urban growth. Nevertheless, the loss of these highly productive agricultural lands and the relocation of the farming operations northward make it imperative that the agricultural lands, north of the H-1 Freeway and along Kunia Road, designated as "Agricultural Land Preservation"


The project site has many of the attributes that would likely qualify it as candidate Important Agricultural Lands, pursuant to Chapter 205, Hawaii Revised Statutes. The Department of Agriculture acknowledges, however, that for many years the City has designated the project site and the balance of the Ewa plain for urban growth. Nevertheless, the loss of these highly productive agricultural lands and the relocation of the farming operations northward make it imperative that the agricultural lands, north of the H-1 Freeway and along Kunia Road, designated as "Agricultural Land Preservation"



Mr. Vincent Shigekuni
April 8, 2008
Page -3-

Thank you for the opportunity to comment on this DEIS. Should you have any questions, please contact Earl Yamamoto at 973-9466 or email at earl.yamamoto@hawaii.gov.

Sincerely,



Sandra Lee Kunimoto
Chairperson, Board of Agriculture

c: Rodney Maile, Acting Director
State Land Use Commission
P. O. Box 2359
Honolulu, Hawaii 96804

Office of Planning

HoopiiEIS2.e08



August 11, 2008

WIRANK BRANDI, ASLA
Chairman

THOMAS WITTEN, ASLA
President

K. NIAN BUNGAN, ASLA
Executive Vice-President

RUSSELL CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, AICP
Principal

TOM SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIMURA, ASLA
Associate

KIM MUKAMI YUEN, LEED AP
Associate

SCOTT ALIKA AHIRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
100 Bishop Street, Suite 409
Honolulu, Hawaii 96813-3884
Tel: (808) 431-2641
Fax: (808) 523-1102
E-mail: planning@pbrhawaii.com

HILO OFFICE
101 August Street
Hilo, Hawaii 96720-4506
Tel: (808) 961-3323
Fax: (808) 961-1989

WAILUKU OFFICE
1377 Wahi Rd, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Ms. Sandra Lee Kunimoto, Chairperson
State of Hawaii
Board of Agriculture
1428 South King Street
Honolulu, Hawaii 96814-2512

Attn: Mr. Earl Yamamoto

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Kunimoto:

Thank you for your letter dated April 8, 2008. We have reviewed your letter and offer the following responses:

Department of Agriculture Comment: "The project site has many of the attributes that would likely qualify it as candidate Important Agricultural Lands, pursuant to Chapter 205, Hawaii Revised Statutes. The Department of Agriculture acknowledges, however, that for many years the City has designated the project site and the balance of the Ewa plain for urban growth. Nevertheless, the loss of these highly productive agricultural lands and the relocation of the farming operations northward make it imperative that the agricultural lands, north of the H-I Freeway and along Kunia Road, designated as "Agricultural Land Preservation" in the Ewa Development Plan and Central Oahu Sustainable Communities Plan remain in agriculture."

Response: We concur some that the property has some of the criteria that would qualify it as Important Agricultural Lands (IAL), the most important criteria being that it is currently in an economically viable agricultural production. It should be noted that the viability of existing agricultural operations is facilitated by extremely favorable land lease and water rates, which are kept at or below market rates). We also concur that since the City has designated the project site and the balance of the 'Ewa plain for urban growth, which the State has strongly supported. This is evidenced by the fact that the State played and continues to play a significant role in planning and funding for the growth of the Second City in Kapolei on formerly highly productive agricultural lands. Major investments in infrastructure (traffic) and other State-funded facilities and projects (the Villages of Kapolei, State office building, the planned new judiciary complex, various DHHL housing developments and the new UH West O'ahu Campus) have contributed and will contribute to the growth of the Second City.

Ms. Sandra Lee Kunimoto

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

August 11, 2008

Page 2

Department of Agriculture Comment: "There are four farming operations that are leased or licensed to occupy nearly the entire project site — Aloun Farms (1,000 acres of which 301 are planted), Fat Law's Farm (100 acres of which 80 are planted), Sugarland Farms (197 acres of which 64 are planted), and Syngenta Seeds (200 acres of which 59 are planted)."

Response: We note the findings of the Agricultural Impact Analysis prepared for the DEIS differ slightly with the information provided above. Table 2 of the Agricultural Impact Analysis ("Hoopili Impact on Agriculture," Decision Analysts, Inc., February 2008) calculates the following: Aloun Farms (1,000 acres of which 301 are planted), Fat Law's Farm (100 acres of which 60 are planted), Sugarland Farms (197 acres of which 74 are planted), and Syngenta Seeds (200 acres of which 52 are planted).

Department of Agriculture Comment: "We find the Agricultural Impact Analysis (AIA) to be very comprehensive and detailed in its description and analysis, but underplays the impact on agriculture by comparing to statewide rather than Oahu parameters. We recommend the full impact of the loss of productive agricultural use of the project site found throughout Volume I of the DEIS be discussed from an Oahu rather than statewide perspective as the primary market for most of the agricultural production is on Oahu. For instance, the 1,497 acres of leased agricultural land in the project site is 13.7% of the 10,900 acres of farm land said to be available on Oahu (3,150 acres in Kuniia and 7,750 acres in the North Shore -Appendix A, page ES-5, section 9-b). The \$6 million in farmgate revenues is about 4.4% of Oahu revenue from sales of all crops (2005 Statistics of Hawaii Agriculture, page 12), or 15.4% of the farmgate value of vegetables and melons produced on Oahu (ibid., page 11). The farm worker employment of 77 people represents about 3.7% of all the farm workers on Oahu (ibid., page 87)."

Response: Based on the information your Department provided, the third and twelfth paragraphs of Section 3.4 *Agricultural Impact, Anticipated Impacts and Mitigation Measures* of the Final EIS will be revised as follows:

The creation of the Ho'opili project will require that the approximately 1,533,844 acre Petition Area be withdrawn from agricultural use. The project will result in a direct loss of approximately 1,497 acres of agricultural land being leased for various agricultural operations. This amounts to less than one percent of the approximately 160,000 acres of agricultural land that remain available throughout the State of Hawai'i. On the island of O'ahu, approximately 10,900 acres of agricultural land would remain available in Kuniia and the North Shore. During the Draft EIS public review period, the State Department of Agriculture commented that the 1,497 acres of leased agricultural land in the project site is 13.7% of the 10,900 acres of farm land reported to be available on Oahu (3,150 acres in Kuniia and 7,750 acres in the North Shore).

Upon full build-out of the Ho'opili project, approximately \$6 million per year in revenues, an average of about 80 jobs and \$1.7 million per payroll will be displaced from the Petition Area. According to comments received from the State Department of Agriculture during the Draft EIS public review period, "the \$6 million in farmgate revenues is about 4.4% of Oahu revenue from sales of all crops (2005 Statistics of Hawaii Agriculture, page 12), or 15.4% of the farmgate value of vegetables and melons

Ms. Sandra Lee Kunimoto

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

August 11, 2008

Page 3

produced on Oahu (ibid., page 11). The farm worker employment of 77 people represents about 3.7% of all the farm workers on Oahu (ibid., page 87). Affected lessees are anticipated to be able to secure replacement lands, therefore, enabling them to maintain prior levels of production, sales revenues, employment and payroll. Should sufficient replacement land not be available on the island of O'ahu, then other options include the relocation of agricultural businesses to Neighbor Islands with available agricultural land.

Department of Agriculture Comment: "Timely relocation of farms and related assets to new production areas is important to minimize the impact of the project on agriculture in general and maintain the availability of a significant supply of fresh food for Oahu. We note that the "...(p)etitioner continues to work on the eventual relocation of the largest tenant, Aloun Farms, Inc., to other farm areas in Central Oahu and the North Shore..." (DEIS Volume 1, page 30). We recommend that the EIS disclose and the Land Use Commission consider requiring meaningful relocation assistance be given to all affected farming operations. Furthermore, the importance of phased development and allowing cultivation of these lands up until the last possible moment is important and should be made a condition of approval by the Land Use Commission, given the 21-year build-out period and the importance of the production in the area to supplying Oahu's demand for fresh fruits and vegetables. Aloun Farms has vacuum cooling and packing facilities; these assets and those of the other farming operations, should be described in the EIS and considered as part of the cost of relocation, particularly if they are fixed (immovable) assets. The lower- than-market land rents (ranging from \$194 to \$630 per acre/year) and irrigation water (pumped groundwater) will be difficult to match elsewhere, and as noted in the report, the primary source of irrigation water for the North Shore agricultural lands is contaminated with sub-standard treated effluent and until R-1 effluent standard can be achieved, cannot be used on directly edible crops (AIA, pages 29-30). In summary, farm relocation is likely to be expensive and time-consuming, even with the business-tested skills of the affected farmers."

Response: As indicated in the Draft EIS, the Petitioner has been working to assist the tenants in finding a suitable site or sites for relocation. However, to date, no site has been secured for that purpose. Given the planned growth in the region, the leases issued to the existing tenants reflected the fact that the area would be subject to urbanization in the future. The tenants all signed the leases with full knowledge of the circumstances. In the meantime and in light of the pending development of the region, land and water were kept at or below market rates.

We note your Department's comments that suggest that the Land Use Commission require meaningful relocation assistance be given to all affected farming operations. As indicated in the prior response, the Petitioner has been working to assist tenants to find sites for relocation and has been subsidizing their rents through below market rates for land and water. Indeed, provisions were also made for multi-year abatement of rent payments as a material enhancement to enter into a lease for an area that was openly acknowledged by all parties as slated for urban development.

With respect to your comment that Aloun Farms' assets such as their vacuum cooling and packing facilities and those of the other farming operations should be described in the EIS and considered as part of the cost of relocation, particularly if they are fixed (immovable) assets. We

Ms. Sandra Lee Kunimoto
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

have fully informed all tenants, including Aloun Farms, of the impending urbanization of the area and have cautioned against additional improvements being located in the Petition Area. In addition, the Petitioner's consideration of their tenants' future requests for improvements will take into consideration the impending development in the area.

It should also be noted that this area has been designated as an urban growth area and the State is also actively developing in the region on adjacent agricultural lands into the Villages of Kapolei, UH West O'ahu (UHWO) Campus, North-South Road and the Department of Hawaiian Home Lands East Kapolei development. As you are aware, Aloun Farms is also a tenant on State lands and will have to relocate from the UHWO and DHHL sites. The State played and continues to play a significant role in planning and funding for the growth of the Second City in Kapolei. Major investments in infrastructure and other publicly funded facilities have contributed to the growth of the Second City. In addition, the City and County of Honolulu is planning on embarking on what may be the largest Capital Improvement Project in the State's history in its Honolulu High Capacity Transit project, which is planned to start in East Kapolei and run through the Petition Area. Finally, during the public review period, the State Department of Land and Natural Resources (DLNR), Engineering Division wrote: "DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opili project...The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (HI-1 Freeway, Farrington Highway, North-South Road) and the City's proposed transit line as well as the substantial increase development projects in the area." The DLNR parcels are being leased by some of the same tenants within the Petition Area.

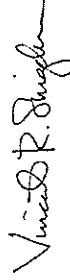
In light of these impending State and County projects, the Petitioner has been working with its agricultural tenants to continue their operations on the Petitioner's land at Petitioner subsidized rates with the full understanding that the Petitioner will develop within the area in the next ten years. We have been and will continue to coordinate with our tenants on our development plans so that relocation will go as smoothly as possible; however, we respectfully disagree with the Department's suggestion that the Petitioner is singled out by being responsible for its tenants' relocation costs when it has attempted to accommodate displaced tenants from other urbanized areas, including State lands.

Ms. Sandra Lee Kunimoto
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 5

Thank you again for your Department's participation in the Environmental Impact Statement process for this project. Your Department's comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Keatoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

C:\hs\6252293.01 DR Hirono-E Kapolei\EIS\Final EIS\Final EIS Response Letters\BL-17 DOA Response.doc

LINDA LINGLE
GOVERNOR



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

MAR - 6 2008

RUSS K. SAITO
COMPTROLLER
BARBARA A. ARNIS
DEPUTY COMPTROLLER
(P)1070.8

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Hoopili, Oahu, Draft Environmental Impact Statement (DEIS) to Reclassify Approximately 1,553.844 Acres from Agriculture to Urban. Petition area: TMK 9-1-17:04 (portion), 59, and 72; 9-1-18:01 and 04; Remainder of the Project Area: 9-1-10:02, 14 (portion), and 15 (portion) and 9-1-17:04 (portion), and 9-2-01: 04, 05, 06 and 07; and 9-2-02:02

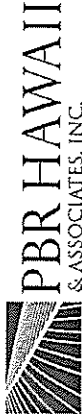
Thank you for your letter dated February 20, 2008. This project does not directly affect the Department of Accounting and General Services' projects or existing facilities, and we have no comments to offer at this time.

If you have any questions, please have your staff call Mr. Bruce Bennett of the Planning Branch at 586-0491.

Sincerely,

Bruce Bennett
ERNEST Y. W. LAU
Public Works Administrator

BB:mo
c: Ms. Katherine P. Kealoha, DOH-OEQC
Mr. Rodney Maile, State Land Use Commission



August 11, 2008

WIRANK BRAND/LEAOLA
Chairman

THOMAS WITLES/ANLA
President

R. STAN D'UCAN/ANLA
Executive Vice-President

RUSSELL CHUNG/ANLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI/ANLA
Principal

TOM SCHINELL/ANLA
Senior Associate

RAYMOND T. HIGA/ANLA
Senior Associate

KEVIN K. NIMIKAWA/ANLA
Associate

KIMU MURAKAMI/ANLA
Associate

SCOTT MURAKAMI/ANLA
Associate

Mr. Ernest Y. W. Lau, Public Works Administrator
State of Hawaii
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawaii 96810

Attn: Mr. Bruce Bennett

SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Lau:

Thank you for your letter dated March 6, 2008 (your reference number: (P)1070.8). We acknowledge your assessment that the proposed project does not directly affect the Department of Accounting and General Services' projects or existing facilities, and therefore, the department has no comments to offer at this time.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

HONOLULU OFFICE
101 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-3884
PH: (808) 521-5631
FAX: (808) 521-5632
E-mail: vincent@pbrhawaii.com

HILO OFFICE
179 W. Ed. Long, Suite 110
Hilo, Hawaii 96720-4262
TEL: (808) 961-3223
Fax: (808) 961-4669

WAILUKU OFFICE
179 W. Ed. Long, Suite 1
Wailuku, Hawaii 96793-1271
TEL: (808) 242-2628

O:\062582593.01 PBR Hawaii-E\Kapelela\BIS\Bart EIS Letters\BL-02 DACGS Response.doc



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

STRATEGIC INDUSTRIES DIVISION
235 South Beretania Street, Liberty A Kamohamoha Bldg., 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96824

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

Telephone: (808) 587-3567
Fac: (808) 588-2538
Web site: www.taxes.govt.hi

April 8, 2008

PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Attn: Vincent Shigekuni

Re: Draft Environmental Impact Statement (DEIS)
Ho'opili, Ewa, Oahu
Tax Map Key: 9-1-17:04 (portion, 59, and 72; 9-1-18:01 and 04; 9-1-10: 02, 14
(portion), and 15 (portion) and 9-2-02:01 (portion), 04, 05, 06 and 07

In response to your February 20, 2008, notice, thank you for the opportunity to provide comments on the DEIS for the Ho'opili development. We have no additional comments to those in our April 9, 2007, letter to you.

Sincerely,

Elizabeth Corbin
Acting Energy Program Administrator

c: OEQC
State Land Use Commission



August 11, 2008

W. IRANK BRANDT, ASIA
Chairman

THOMAS WITTLIN, ASIA
President

K. STAN BUNGAN, ASIA
Executive Vice-President

RUSSELL M. CHUNG, ASIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, AKIP
Principal

TOM SCHINELL, AKIP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

KEVIN K. SHIKAWA, ASIA
Associate

KIM MIKAMI YUN, LILIP, AP
Associate

SCOTT ALAKA, BRIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-3184
Tel: (808) 521-2641
Fax: (808) 521-1102
E-mail: operations@pbrhawaii.com

HILO OFFICE
111 Airport Street
Hilo, Hawaii 96720-3926
Hilo, Hawaii 96720-3926
Tel: (808) 960-2323
Fax: (808) 960-4987

WAILUKU OFFICE
1787 Wai'ala Lane, Suite 3
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Ms. Elizabeth Corbin
Acting Energy Program Administrator
State of Hawai'i
Department of Business Economic Development & Tourism
Strategic Industries Division
P.O. Box 2359
Honolulu, Hawaii 96804

SUBJECT: HO'OPIILIDRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Corbin:

Thank you for your letter dated April 8, 2008. We acknowledge that your department has no additional comments to those provided in your Department's letter dated April 9, 2007.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

0A06b595303.01 DR Horton-B KapohalaEISFinal EISFinal FIS Response Letter-BL-24 DIBEDT Response.doc

LINDA LINGLE
Governor

JAMES R. AIOHA, JR.
Lieutenant Governor

THEODORE E. LIU
Director

MARK K. ANDERSON
Deputy Director



LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawaii

March 27, 2008

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Docket No. A06-771

Draft Environmental Impact Statement (DEIS)
Ho'opi'i
Ewa, Oahu, Hawaii
Tax Map Keys: 9-1-17, por. 4, 59, and 72; and 9-1-18: 1 and 4

We have reviewed the subject DEIS for the proposed development and have the following comments:

- 1) In accordance with section 11-200-17(e)(5), HAR, the phasing and timing of the proposed action should be described. The DEIS points out that the project timeline extends from 2009 to 2030. Pursuant to the Land Use Commission's (LUC) rules (§15-15-50(c)(19), HAR), in the event full urban development cannot substantially be completed before ten years following LUC approval, a schedule for development of the total project together with a map identifying the location of each increment shall be provided. Accordingly, we request that the current development timetable in the DEIS be expanded to more specifically identify the phases of each component of the development and their respective timeline for completion and also be accompanied by a map illustrating their location.
- 2) In accordance with section 11-200-17(f), HAR, alternatives to the proposed action should be described in a separate and distinct section. We note that the alternatives that are presented are primarily discussed in a negative context relative to the proposed development. Please also include a discussion on the potential benefits of the alternatives, including the extent to which the alternatives could avoid some or all of the short and long-term adverse environmental effects.

255 SOUTH BERKELEY STREET • SUITE 405 • HONOLULU, HAWAII 96813 • TEL (808) 587-4222 • FAX (808) 587-3276 • EMAIL: luc@csweb.hawaii.gov
Mailing Address: P. O. Box 2359, Honolulu, Hawaii 96804

Mr. Vincent Shigekuni, Vice President
March 27, 2008
Page 2

3) In accordance with section 11-200-17(h), HAR, the status of each identified approval should be described. Therefore, we request that to the extent possible the *projected* submittal dates (i.e., by month/year) of the applications and plans for approval to the various agencies be provided.

4) In accordance with section 11-200-17(i), HAR, the probable impact of the proposed action on the environment shall be included. Review of the DEIS indicates that no inventory and assessment of arthropods on the subject property was conducted. In the interest of full environmental disclosure, we request that such a study be conducted.

In addition, we request that the discussion on solid waste disposal (section 4.8.6) reference the LUC's recent action that extended the deadline to close the Waimanalo Gulch Sanitary Landfill to November 1, 2008, and the current plans of the City and County of Honolulu, Department of Environmental Services to expand the landfill by another approximately 92.5 acres.

A discussion on the existing civil defense conditions and potential impacts and proposed mitigation measures should also be included.

Section 11-200-17(i), HAR, also requires that the interrelationships and cumulative impacts of related projects be discussed, including the potential secondary effects. We note that section 7.2, *Cumulative and Secondary Impacts*, confines the discussion to proposed developments in the East Kapolei region to include the University of Hawaii at West Oahu campus, the Department of Hawaiian Home Lands East Kapolei Development Parcels 1 and 2, and the Kroc Center. We note that there is no mention of existing developments in the Ewa District in which the project is situated. Accordingly, we request that existing developments, including, but not limited to, the communities of Waipahu, West Loch, and Ewa Villages also be considered in the assessment of cumulative and secondary effects.

5) We note that the subject property was cultivated in sugarcane or pineapple and is currently used for, among other things, diversified agriculture. As such, there may be chemicals associated with these activities that are present in the soils. To the extent that such chemicals could be a threat to public health and the environment, we request that this matter be assessed to determine the potential risks and any remedial action that needs to be taken.

6) We request that information on the cost of the project be expanded to include a breakdown of costs by component (onsite and offsite) and by development phase.

7) For your information, Schuler Homes, Inc., a Delaware corporation, filed a Petition for Land Use District Boundary Amendment (Petition) on May 16, 1996, to reclassify a portion of the Petition Area, consisting of approximately 753.573 acres of land, from the Agricultural District to the Urban District for single and multi-family residential, commercial, school, and park uses. The Petition was voluntarily withdrawn pursuant to

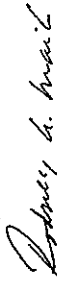
Mr. Vincent Shigekuni, Vice President
March 27, 2008
Page 3

the Commission's Order Granting Motion to Withdraw Petition for Land Use District Boundary Amendment dated September 18, 1996. We request that the DEIS be revised to include this previous filing in the background description of the Petition Area.

We have no further comments to offer at this time. Thank you for the opportunity to comment on the subject DEIS.

Should you have any questions, please feel free to call me or Bert Saruwatari of our office at 587-3822.

Sincerely,



RODNEY A. MAILE
Interim Executive Officer

c: Office of Environmental Quality Control



August 11, 2008

W. FRANK BRANDT, ASLA
Chairman

THOMAS WITTEN, ASLA
President

K. STAN BUNGAN, ASLA
Executive Vice-President

RUSSELL M. CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURAKAMI, AICP
Principal

TOMASCHNELL, AICP
Senior Associate

RANDY D. LIGA, ASLA
Senior Associate

KIMIKO NISHIKAWA, ASLA
Associate

KIMMIKAMI YUEN, LL.D. A.P.
Associate

SCOTT ALIKA, AIBI/IGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1111 Kalia Road, Suite 150
Honolulu, Hawaii 96813-3484
Tel: (808) 521-2641
Fax: (808) 521-1462
E-mail: opadmin@pbrhawaii.com

HILO OFFICE
1141 Puget Street
Hilo, Hawaii 96720-5852
Tel: (808) 961-4323
Fax: (808) 961-4967

WAILUKU OFFICE
1287 W. Ii Lane, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Mr. Dan Davidson, Executive Officer
Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804

Attn: Mr. Bert Saruwatari

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Davidson:

Thank you for the letter dated March 27, 2008. We have reviewed the LUC's letter and offer the following response to your comments.

1. As requested the preliminary phasing and timing of the proposed project will be provided in the Final EIS. Section 2.7 *Development Timetable and Preliminary Costs* of the Final EIS will be revised as follows:

The Petitioner estimates that the development of the Ho'opi'i project (major off-site and on-site infrastructure improvements including grading, drainage, sewer, safe-drinking water, non-potable water, roadways, landscaping and improvements to Farrington Highway and North-South Road for access) will cost approximately \$4.6 billion (in Year 2007 dollars) spent over the project timeline of 2009 - 2030. During the public review period, both the Land Use Commission and the State Office of Planning made reference to subsection 15-15-50, Hawaii Administrative Rules (HAR). Subsection 15-15-50, HAR identifies the form and contents of a petition to the State Land Use Commission to amend the State Land Use District Boundaries, including representing "...that development of the subject property in accordance with the demonstrated need therefore, will be accomplished before ten years after the date of commission approval. In the event full urban development cannot substantially be completed within such period, the petitioner shall also submit a schedule for development of the total of such project in increments together with a map identifying the location of each increment, each such increment to be completed within no more than a ten-year period." The construction of Ho'opi'i's development will be a challenging process that will require ongoing coordination between many fundamental parts. Infrastructure and road access, neighboring property development, demands of the commercial and housing markets, careful continued agriculture and general property management, and economic viability will all be considered throughout the construction planning process. Furthermore, the City & County of Honolulu's (City) transit project, the largest public works endeavor in Hawaii's history, will within Ho'opi'i have its longest traverse through privately owned property and further expand development challenges undoubtedly in unprecedented ways. Many of these parts may involve developing different areas of the project site within the same construction timetable as discussed further below:

Several major development priorities include in no particular order:

- Water Service from the North. Both of Ho'opi'i's main potable water storage and transmission systems will reside mauka of H-1. Considerable investment will be required in the construction of tanks and transmission lines that will ultimately service two water zones within Ho'opi'i that roughly divide the site between northern and southern halves. (Necessary off-site utility easements have already been secured at a price.) Nonpotable water will be sourced from the reclamation operations at the Honolulu Wastewater Treatment Plant (WWTP), meaning it will be delivered to Ho'opi'i from the opposite end from where its potable source will come. Preliminary budgetary construction cost estimates range from between \$35 million to \$40 million with another \$20 million possible from BWS for service connections.

- Sewer Service from the South. Unlike Ho'opi'i's main water system, sewer service will come from the southern end of the property. The first of what is expected to be several Joint Development Agreements (JDA) to secure and construct wastewater transmission is in place with DHHH, UHWO, DLNR and the City and funded. Indeed, the DOT has already constructed this line as part of the North-South Road Phase 1A contract. Discussions are expected to

commence later this year in earnest on separate JDAs for two additional segments. Nearly \$2 million has already been invested to date, preliminary budgetary costs estimates for these two JDAs range from \$10 million to \$15 million to stub service at the property's southwestern border, \$5 million to \$10 million to route through to the mauka area and as much as another \$60 million for the City's Department of Environmental Services uses connection charges.

- Balancing Spread out Access, Initial Infrastructure Needs and Cash Flows. Today, Ho'opi'i's lands along the Farrington Highway corridor, its northernmost boundary, present Ho'opi'i's easiest access for construction purposes and future occupants. Once DHHH completes its section of the East-West Connector Road and the State DOT completes the North-South Road (both now under construction), Ho'opi'i will have construction and occupant access open at its southern and westernmost locations. This is significant because while available for development today, the Farrington Highway corridor is expected to present some of Ho'opi'i's greatest development challenges, predominantly the distance sewer lines will have to run through undeveloped land for service, as well as timing development to the City's planned improvements to Farrington Highway itself. Thus, the Petitioner will look to mobilize on these other areas as early as practicable. Nonetheless, there are several key commercial parcels in this Farrington Highway corridor that will need to be among the earliest to be marketed in order to generate cash flow to support needed upfront utility (such as water and sewer as detailed above) and road infrastructure throughout Ho'opi'i. As a result, development should be started in more than one area from the onset. Over the build-out of the project, it is expected that as much as \$30 million to \$60 million could be spent on drainage systems and hundreds of millions will be invested in roadway systems servicing the project.

- Balancing Job Generation, Appropriate Initial Housing Deliveries and Transit. The majority of the employment areas within Ho'opi'i are within the Farrington Highway corridor to the north of the property, while the residential development areas that could be most sensible to develop first – the single-family areas – are to the south. Starting housing construction there could generally preserve higher density development in the areas in and around the transit corridor to the north to be better sited with transit's completion and more appropriately address the various demands it will create.

- Managing Agricultural Operations. As lands are moved into development over time, consideration will have to be given to the significant challenges of maintaining a working agricultural water system and providing ongoing and unencumbered vehicular access to crop areas. This will be no small task, as it will be the objective of the Petitioner to keep active farms onsite as long as practicable.

As previously stated the development is expected to occur over approximately 20 years. This area of 'Ewa has long been planned for development (Kapolei Area Long Range Master Plan and Ewa Development Plan).

There are several major transportation projects that have been planned for 'Ewa. The Ho'opiili project has been planned assuming that certain planned transportation projects will be constructed including a portion of North-South Road between Farrington Highway and Kapolei Parkway; a portion of the North-South Road and a new H-1 Freeway interchange; a portion of the intersection of North-South Road and Farrington Highway; the long-planned widening of Farrington Highway fronting Ho'opiili; the proposed East-West Connector Road through the Petition Area; and the first segment of the proposed Honolulu High-Capacity Transit Corridor project through the Petition Area. As major off-site infrastructure (water, sewer, drainage, electrical and communications) would likely occur in most of the above major road right-of-ways, and the exact timing of the completion of these transportation improvements undetermined, it is difficult for the Petitioner to provide a map identifying the phasing of the proposed action in 10 year increments with any degree of certainty. While the phasing of development may be more relevant where there is little or no development, 'Ewa has rapidly developed in recent years and proposed transportation improvements are indicative of State and County assumptions that this portion of 'Ewa would be eventually developed.

2. Alternatives to the proposed action were already described in separate and distinct sections of the Draft EIS (Section 6.0). Section 6.0 Alternatives to the Proposed Action of the Final EIS will be revised as follows:

In compliance with the provisions of Title 11, Department of Health (DOH), Chapter 200, Environmental Impact Statement Rules, Section 11-200-10(6), the alternatives considered are limited to those that would satisfy the objectives of the proposed mixed-use development, while minimizing the potential for adverse environmental impacts. The feasible alternatives must realistically address the project's economic characteristics while also responding to the surrounding land uses that will be impacted by the project. In conformance with applicable regulations, other possible alternatives have been investigated to identify alternative sites, the appropriate uses for the property, and how they would best be accomplished.

6.1 "NO-ACTION" ALTERNATIVE

The "no-action" alternative would not be consistent with stated governmental policies, which direct future growth to the 'Ewa region. The City and County of Honolulu General Plan states:

Encourage development within the secondary urban center at Kapolei and the Ewa and Central Oahu urban-fringe areas to relieve developmental

pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.

Under this alternative, the site would remain as agricultural land, underutilized in terms of meeting the demand for residential homes (including affordable homes) and accompanying land uses. The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall. The demand for housing could result in the following scenarios or combinations thereof: there would be more pressure to develop in the other districts, including the rural areas and other areas currently used for cultivation; there could be a demand for higher density housing in undeveloped areas of 'Ewa at a density not experienced to date; there would be more "doubling up" (larger number of persons per household, with more than one family under roof); those that are not willing to put up with the previously described scenarios may decide to relocate to the U.S. mainland where housing prices have dropped.

The "no-action" alternative was rejected because it is not consistent with government plans to develop Kapolei as the Second City.

6.2 ALTERNATIVE SITES

There are very few large parcels left on O'ahu that are designated for residential development. The largest amount of developable land that is undeveloped lies in Central O'ahu and on the North Shore. As shown on the Ewa Development Plan, the Petition Area is designated mostly Low and Medium Density Residential. As such, the City and County of Honolulu has long recognized that the Petition Area is best used for residential and other development. Directing growth to 'Ewa and in the "urban-fringe" portions of Central O'ahu reduces the pressure to develop outside of the Urban Growth Boundary of Central O'ahu, and the North Shore, Ko'olau Loa, Ko'olau Piko and Wa'ianae districts. This alternative has been rejected because it would be clearly contrary to General Plan policy. The potential benefit of this alternative is that for those that object to further development on the 'Ewa Plain, it might be preferable for development to occur elsewhere on O'ahu, such as in the Primary Urban Center, East Honolulu, Central O'ahu, North Shore, Ko'olau Loa, Ko'olau Piko and Wa'ianae districts.

The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid infrastructure impacts (solid waste, wastewater and additional stormwater runoff

generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment, traffic impacts, and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall.

6.3 ALTERNATIVES RELATED TO DIFFERENT DESIGNS OR DETAILS OF THE PROPOSED ACTIONS WHICH WOULD PRESENT DIFFERENT ENVIRONMENTAL IMPACTS

Different designs could be applied to the project, and depending on the density and design capacity, would result in different environmental impacts. For example, a higher density project that kept the same residential unit count as proposed (11,750) would reduce the buildable area (a positive benefit) and possibly reduce the quantity of surface runoff (a positive benefit). ~~But~~ Another potential benefit of this alternative is that it would likely be easier to serve by bus and correspondingly increase ridership. However, the residential buildings would be larger and taller. This alternative would not allow as wide a range of residential products to market and was thus rejected. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater, and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion).

Another alternative would be to set aside less open space and to spread out the community over a larger land area. Such an alternative is best portrayed by the current Kapolei Long Range Master Plan and Ewa Development Plan Land Use Map designations for the Petition Area. This alternative would reduce the density (a some, a positive benefit) but consume more land, increasing the quantity of surface runoff, and requiring a much larger investment in grading and infrastructure. This alternative would make it difficult for residents to be served by bus, and even more difficult by high-capacity transit. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater, and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). This alternative was also rejected.

The demand for safe drinking water and the quantities of wastewater, solid waste, and traffic generated would vary with different designs, depending on the number/quantity of residential units, schools, commercial square footage, and roads.

6.4 ACTIONS OF A SIGNIFICANTLY DIFFERENT NATURE WHICH WOULD PROVIDE SIMILAR BENEFITS WITH DIFFERENT ENVIRONMENTAL IMPACTS

One scenario that would be significantly different from the proposed action is that an elevated rail line and accompanying transit stops would not be built through Ho'opili. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts (assume greater traffic impacts than without the HHCTC project); and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust, and soil erosion). The impacts of this scenario will be more fully described in the upcoming HHCTC DEIS.

For the 'Ewa district drivers enduring the longest morning commutes to the Central Business District or UH Mānoa, the modes of transportation will continue to be limited to: private motorized vehicle (including zipper lane), The Bus, The Boat, Vanpool, et cetera. While this is a scenario that could inevitably result in lengthening commute times, individual commuters will either: bear with the commute in return for the comfortable lifestyles offered by their homes in 'Ewa; move from their homes in 'Ewa and move closer to their workplaces or schools; or find schools and/or employment in the 'Ewa region. The opening of UHWO will reduce traffic from those undergraduate students in Leeward and Central O'ahu who commute to UH Mānoa, and indirectly reduce the demand for student housing on the UH Mānoa campus (reducing the demand for off-street parking demand on campus, reducing the supply of student housing on campus, and reducing the demand for student housing off-campus). If the Petitioner is allowed to develop a mixed-use (residential/commercial/office/light industrial) project as proposed, then, more employment opportunities will be provided to existing residents of the region, reducing the need for some 'Ewa residents to commute outside of the District to work. To offset the non-implementation of the HHCTC project, the City and County of Honolulu may decide to increase The Bus and The Boat services. The positive benefits of this alternative is that the visual impact impacts of an elevated rail system would be avoided as well as long-term commitment of State and Federal funds for the HHCTC project. This alternative is not desirable, but feasible.

6.5 THE ALTERNATIVE OF POSTPONING ACTION PENDING FURTHER STUDY

Development of the 'Ewa region as O'ahu's Second City has been studied and planned for many years. Further study of any proposed development on the property would only be delaying what has long been proposed in the Ewa Development Plan. Therefore, this alternative was rejected, as it would not achieve the overall objectives for the project, which would create a mixed-use community that more employment opportunities will be provided to existing residents of the region, reducing the need for some 'Ewa residents to commute outside of the District to work. The potential

benefit of this alternative is that while remaining under cultivation, the site would provide open space... Occasionally, however, continued cultivation of the site would generate dust when portions of the site are harvested and plowed. Implementation of this alternative will temporarily avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall.

3. As requested, Table 2.3 *Required Permits/Approvals* of the EIS will be revised to include the projected submittal dates (as follows).

Table 2.3. Required Permits/Approvals

PERMIT/APPROVAL	APPROVING AUTHORITY	STATUS	PROJECTED SUBMITTAL DATE
State Land Use District Boundary Amendment (with EIS)	State of Hawai'i Land Use Commission	Petition has been filed; processing on hold until EIS process has been completed.	First Quarter 2007
Zone Change	City and County of Honolulu Department of Planning and Permitting/City Council	Application to be filed assuming successful processing of SLUDBA.	Third Quarter 2009
Large Lot Subdivision Approval Action	City and County of Honolulu Department of Planning and Permitting	Application to be submitted after change the Zone Change application is approved.	Third Quarter 2010
National Pollutant Discharge Elimination System (NPDES) Permit	State of Hawai'i Department of Health	Application to be submitted prior to Building/Grading Permits.	2011
Building/Grading Permits	City and County of Honolulu Department of Planning and Permitting	Application to be filed after the Zone Change application is approved.	2011
Water Use Permit	State of Hawai'i Department of Land and Natural Resources, Commission on Water Resource Management	Application to be submitted prior to Building/Grading Permits	2011

4. As requested, an assessment of arthropods on the subject property was conducted and is enclosed to this letter. A new paragraph will be added before the last paragraph of Section, 3.8 Fauna, Existing Conditions of the Draft EIS:

During the public review period, the Land Use Commission requested an assessment of arthropods on the Petition Area. A survey of arthropods on the Petition Area was conducted on May 9, 2008 by Dr. Gregory Bremner of Pacific Analytics, L.L.C. The primary objectives of the survey were to: provide a general description of the arthropod fauna of the Petition Area; evaluate the habitats (if any); and search and assess the potential for threatened or endangered arthropod species as well as species of concern. According to Dr. Bremner, the arthropod species that were collected during the study would be considered typical of what would be found in lowland sites with little or no native vegetation and disturbed by agricultural operations. No species were found that are locally unique to the site. A copy of the assessment is attached to this EIS as Appendix R.

In addition a new paragraph will be added after the last paragraph of Section 3.8 Fauna, Anticipated Impacts and Mitigation Measures:

The results of the arthropod survey at the Petition Area (See Appendix R) indicate that there are no special concerns or legal constraints related to invertebrate resources in the Petition Area. No invertebrate species listed as endangered, threatened or that are currently proposed for listing under either Federal or State of Hawai'i endangered species statutes are known to exist on the project site.

As requested, the second paragraph of Section 4.8.5 Solid Waste Disposal Facilities of the EIS will be revised as follows:

Waimānalo Gulch Landfill, which opened in 1989, is located northwest of the proposed Ho'opi'i project. While the land is owned by the City and County of Honolulu, the landfill is operated by Waste Management, Inc. The site accepts ash and residue from the H-POWER facility, industrial wastes, and non-combustible construction and demolition debris. Commercial haulers pay \$72.75 per ton to dispose solid waste at the facility. During the public review period, the State Land Use Commission reported that it took action to extend the deadline to close the Waimānalo Gulch Sanitary Landfill to November 1, 2008, and the City and County of Honolulu Department of Environmental Services has plans to expand the landfill by another approximately 92.5 acres.

As requested, a discussion on the existing civil defense conditions and potential impacts and proposed mitigation measures will also be included. During the public review period, the State Civil Defense's (SCD) requested that the developer install at least three outdoor warning sirens. A new paragraph will be added at the end of Section 3.6 Natural Hazards, Anticipated Impacts and Mitigation Measures of the EIS to read as follows:

During the public review period of the Draft EIS, the State Civil Defense (SCD) commented that "the developer install at least three outdoor warning sirens... At the present time SCD personnel recommends that the minimum-size siren have a sound rating of 121-decibels @ 100 feet, omni-directional and solar powered." SCD also noted that "As the development plans are finalized, State Civil Defense (SCD) will be better able to define the placement and size of the sirens." The Petitioner will continue to coordinate with the SCD as development plans are finalized to be better able to define the placement and size of the sirens.

As requested, Section 7.2 Cumulative and Secondary Impacts of the EIS will be revised to include a discussion of existing developments.

This chapter identifies cumulative and secondary impacts that may result from the development of Ho'opi'i and the East Kapolei region. During the public review period, the State Department of Land and Natural Resources (DLNR) Engineering Division wrote: "DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opi'i project...The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (H-1 Freeway, Farrington Highway, North-South Road) and the City's proposed transit line as well as the substantial increase development projects in the area. Consequently, regional infrastructure should take into consideration the potential development of the DLNR parcels, and DLNR requests that it be included in the planning and design of any regional infrastructure in the area that would serve the DLNR parcels."

7.2.1 Impacts on the Physical Environment

Climate, Topography, and Soils. Planned developments in the East Kapolei region (the proposed Ho'opi'i project, University of Hawai'i at West O'ahu (UHWO), Department of Hawaiian Home Lands (DHHL), East Kapolei Development Parcels 1 and 2, Kroc Center, and the "DLNR parcels") are not expected to adversely impact regional climate, topography, and soils of existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, Ewa Villages, Ewa Villages of Kapolei and Makaha. However, within their respective project sites, construction of the East Kapolei developments will impact mostly minor topographic features and soils, and new buildings may affect the respective micro-climate of each building site (by retaining and/or reflecting solar energy and heat, creating shade where none presently exists, or creating "wind tunnels"). Grading operations will comply with DOH regulations and are not expected to adversely impact air and water quality.

Drainage and Groundwater. Regional infrastructure will be developed to control drainage in the East Kapolei area, for those areas draining into Kalo'i Gulch. The planned developments will introduce impervious surfaces through the construction of buildings, roadways, parking areas, and walkways. Increased impervious surfaces

(i.e., roofs, roadway surfaces, and sidewalks) will increase the potential for runoff although existing and proposed detention basins throughout East Kapolei will effectively manage drainage towards Kalo'i Gulch or other drainage basins. Through implementation of the proposed drainage improvements, the planned developments in East Kapolei are not expected to adversely impact existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa, Ocean Pointe, Villages of Kapolei and Makakilo. Additionally, landscaping introduced by the East Kapolei developments will reduce the potential for soil erosion, compared to current conditions on vacant and actively cultivated lands. All drainage facilities will comply with the City and County of Honolulu's Storm Drainage Standards. A non-potable water system will be developed for 'Ewa to reduce the demand for safe drinking water from the BWS system.

Natural Hazards. It is unlikely that any of the proposed structures and uses associated with the planned developments in 'Ewa will affect the potential occurrence of earthquakes, hurricanes, or tsunami or adversely impact existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa, Villages of Kapolei and Makakilo. By designing future structures to the then-approved building code, future buildings will likely be designed to mitigate the potential damage from natural hazards.

Flora and Fauna. The cumulative impact of the planned developments in East Kapolei is the reduction of habitat. However, past and present agricultural activities in the Petition Area have altered natural habitats; as such, existing flora and fauna are primarily introduced species. During construction, feral species are likely to vacate the site for suitable habitats nearby. After construction, these species may return, depending on their preference of habitat and the landscaping provided. The planned developments in East Kapolei are not expected to adversely impact the flora and fauna of existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa, Villages of Kapolei and Makakilo.

7.2.2 Impacts on the Human Environment

Archaeological/Historic and Cultural Resources. An archaeological inventory survey was conducted of the Petition Area. Five historic properties were documented on the Petition Area. All five historic properties have been assessed as eligible for the State Register of Historic Places under Criteria C and D, except for Site 4344, which is only eligible under criterion D. The State Historic Preservation Division (SHPD) concurs with these significance assessments. According to SHPD, the archaeological inventory survey report is now accepted. In addition, a preservation plan and archaeological monitoring plan will be prepared and submitted to SHPD for its review and approval. Recently completed archaeological inventory survey reports for both the proposed project and the neighboring 500-acre UHWO site provide more information about the 'Ewa area and consistently show that due to prior sugar cane cultivation, pre-historic features are nearly non-existent. A cultural

impact assessment was also prepared for the Petition Area and it found that there are no contemporary or continuing cultural or traditional practices currently occurring within the proposed Project Area. Therefore, no impacts are expected and no mitigation measures are planned. The regional cumulative impacts on archaeological and cultural resources within 'Ewa appear to be minimal. The planned developments in East Kapolei are not expected to adversely impact the archaeological and historical resources of the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa, Villages of Kapolei and Makakilo.

Agriculture. Lands in the Petition Area and the remainder of 'Ewa were historically used for sugarcane cultivation and most recently for diversified agriculture. Much of East Kapolei (including the Petition Area) is actively cultivated through short-term agreements. With the proposed developments in East Kapolei (UHWO, DHHL East Kapolei Development Parcel 1, DHHL East Kapolei Development Parcel 2 and Ho'opili, land will be withdrawn from production, resulting in some loss in revenues, jobs, and payroll, unless replacement agricultural leases are established elsewhere. While some agricultural land is available to accommodate the projected growth of diversified agriculture on O'ahu (such as Central O'ahu and the North Shore) and elsewhere in the State of Hawaii, some reviewers of the Draft EIS have expressed concern about the potential loss of agricultural land. The planned developments in East Kapolei are not expected to adversely impact the agricultural resources of the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa, Villages of Kapolei and Makakilo. However, ultimate development of the Petition Area and the remainder of East Kapolei will reduce the exposure of soils to the erosional forces of wind and rainfall.

Noise. Over the long term, as 'Ewa develops and the 'Ewa population grows, noise levels will increase above current conditions. Residential, business/commercial, light industrial/business, parks, schools and other public facilities will generate noise. New roadways and improvements to existing roadways are proposed, and vehicles traveling to, from, through, and within the 'Ewa area will be a significant contributor of noise. The planned HHCIC will also generate noise. East Kapolei is generally not surrounded by noise sensitive uses (residential, educational and medical structures and facilities). Mauka of East Kapolei is H-1 and vacant land. To the west is the Kapolei Golf Course. To the south are Kapolei Parkway and the 'Ewa Villages Golf Course and to the east and grade-separated is Old Fort Weaver Road and Honouliuli Village. However, noise-sensitive uses (residential, educational and medical) occurring in buildings are likely to be insulated and equipped with air conditioners, mitigating noise from traffic, wind, and aircraft.

Air Quality. Emissions from cars and equipment used to generate electricity can affect air quality. The planned developments in East Kapolei will attract traffic and use electricity, but are not expected to significantly affect regional air quality, as new technologies, increasingly stringent air pollution control regulations and improving

automobile technology, and alternative forms of transportation (i.e., Honolulu High-Capacity Transit Corridor (HHCTC), buses and other public transportation, bicycling, walking) may offset potential increases in air pollution. Predominant trade winds during the afternoon provide dispersal of emissions. The planned developments in East Kapolei are not expected to adversely impact the long-term air quality of the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanalei, 'Ewa Villages, 'Ewa Villages of Kapolei, and Makaha. Depending on the phase of construction, there will be occasions when dust may be generated despite mitigative measures (such as during gusts of particularly strong wind) and depending on the location of construction may affect Hanalei (which is mostly upwind of the project site). 'Ewa Villages (separated by the 'Ewa Villages Golf Course) and the DHHL East Kapolei Development Parcel 2 project (tabulated). The Petitioner and DHHL is coordinating on mitigating this potential impact.

Man-Made Hazards. No industrial facilities handling explosive or fire-prone materials (i.e., liquid propane, gasoline, or other storage tanks) exist in the Petition Area. However, there are two hazardous sites in and near the East Kapolei area – the former 'Ewa Sugar Mill, which is surrounded by the 'Ewa Villages residential and golf project and has a current status of No Further Remedial Action Planned, and the 'Ewa Sugar/O'ahu Sugar Company Pesticide Mixing and Loading Site, which is located to the east of North-South Road on Department of Hawaiian Home Lands (DHHL) property. The land uses proposed by the planned developments in 'Ewa are heavy industrial land uses or zoning are proposed) are not likely to expose people or buildings to explosive or flammable fuels or chemical containers. The planned land uses in East Kapolei are not expected to expose residents of the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanalei, 'Ewa Villages, 'Ewa Villages of Kapolei and Makaha to noxious land uses.

Visual Resources. The planned developments in East Kapolei will change the open space character of the area and introduce urban structures and street trees including the UHWO campus, various types of residences (associated with DHHL, UHWO and the proposed project), commercial/industrial/business centers (associated with DHHL, UHWO and the proposed project), schools, public uses (the Kroc Center, churches) and transportation facilities (such as the North-South Road and in the most visually prominent scenario of high-capacity transit – elevated rail, associated transit stations, a park and ride facility and possibly a rail transit maintenance and storage facility). The East Kapolei developments will include landscaping to reduce the bulk of buildings and structures, and enhance the visual character of the sites. In the case of Ho'opi'i, open space buffers will reduce the impact of views from the H-1 Freeway, and relatively low-intensive land uses are proposed along Old Weaver Road near Hanalei Village. Also within Ho'opi'i, mostly lower density housing is proposed along the 'Ewa Villages Golf Course and along DHHL East Kapolei Development Parcel 2, to maintain the character of these surrounding areas. The planned developments in East Kapolei will permanently replace the open space character of

East Kapolei with a master-planned community as viewed from the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanalei, 'Ewa Villages, 'Ewa Villages of Kapolei and Makaha.

7.2.3. Impacts on the Socio-Economic Environment

Population, Housing, Neighborhood Commercial Uses, and Character/Lifestyle of the Community. The planned developments (UHWO, DHHL East Kapolei Development Parcels 1 and 2, Kroc Center and Ho'opi'i) will help to further the growth of the Second City by adding to the critical mass of residential, business/commercial, light industrial/business open space, parks, schools and other public facilities in 'Ewa, making it a more "complete" community. In the same fashion that many residents in East Honolulu or the Primary Urban Center have no need to leave to visit other districts for essential "goods and services," 'Ewa residents may someday have little need to leave their district. No homes or residents will be displaced by the East Kapolei projects, which will be developed on lands that are currently undeveloped, most of which is being cultivated. The planned developments in East Kapolei will provide a variety of live, work, play, study and shopping opportunities to the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanalei, 'Ewa Villages, 'Ewa Villages of Kapolei and Makaha, which are not currently available on site.

Economic Impacts and Employment. As the planned developments in East Kapolei are gradually built out, agricultural lands will be withdrawn from agricultural production, resulting in some loss of revenues, jobs, and payroll. It is likely though, that cultivation is likely to gradually relocate to vacant agricultural land further north of East Kapolei and in Kunia, Central O'ahu, and the North Shore. Over time, the loss of economic productivity from agricultural activity will be more than offset by the construction of the planned developments, which will provide significantly greater revenues, more employment opportunities, and higher payrolls. Local businesses will profit from the developments in 'Ewa, and money spent by workers and businesses will flow through the West O'ahu regional economy particularly in the City of Kapolei. The County and State will benefit from the developments through the generation of real property, income and general excise tax revenues, more than off-setting government services. The planned developments in East Kapolei will provide a variety of live, work, play, study and shopping opportunities to the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanalei, 'Ewa Villages, 'Ewa Villages of Kapolei and Makaha, which are not currently available on site.

7.2.4. Impacts on Infrastructure Facilities

Water. Many of the new residents in 'Ewa will have already been residing on O'ahu, thus the demand for water will shift from where they live now on O'ahu to 'Ewa. The 'Ewa projects are being designed assuming to assure that there are adequate sources, storage and transmission facilities to service 'Ewa, without having to reduce source from where future residents currently reside elsewhere on O'ahu and relocate

the water allocation to 'Ewa. UHWO and Ho'opili will be designed to include dual water systems, allowing new parks, open space and roadway landscaping to be irrigated with recycled water from the Honouliuli Water Reclamation Facility (WRP). The planned developments in East Kapolei are not expected to adversely impact the supply of drinking water for the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

Wastewater. Many of the new residents in 'Ewa will have already been residing on O'ahu, thus the need for collection, treatment and disposal of wastewater will shift from where they live now on O'ahu to 'Ewa. The 'Ewa projects are being designed assuming to assure that there are adequate collection, treatment and disposal facilities to service 'Ewa. Where other wastewater treatment facilities on O'ahu do not have the capability to provide recycled water, Honouliuli does. Also, since UHWO and Ho'opili will be designed to include dual water systems, this will allow parks, open space and roadway landscaping to be irrigated with recycled water from the Honouliuli WRP. The planned developments in East Kapolei are not expected to adversely impact the capacity of the existing wastewater system to treat and dispose of wastewater currently being generated from the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

Drainage. The Petition Area falls within three different drainage basins. One of these three drainage basins, Kalo'i Gulch, is shared by UHWO, DHHL, Ho'opili and the Kroc Center. The Kalo'i Gulch drainage basin stretches to the top of the eastern slopes of the Wai'anae mountain range and terminates near the ocean in the vicinity of Haseko's Ocean Pointe development. The drainage basin, mauka of the H-1 Freeway, is 3,000 acres and generates a peak flow of 5,000 cubic feet per second (CFS). The drainage basin size increases to 4,330 acres and carries a peak flow of 8,900 CFS at the entrance to 'Ewa Villages. Approximately only 100 acres of the Ho'opili project are within this watershed.

The proposed developments in East Kapolei will increase impervious surfaces such as roadways, roofs, paved parking areas, and sidewalks. These surfaces will cause an increase in storm water discharge within the Kalo'i Gulch drainage basin. However, each of the East Kapolei projects (the proposed Ho'opili project, University of Hawai'i at West O'ahu (UHWO), Department of Hawaiian Home Lands (DHHL) East Kapolei Development Parcels 1 and 2, Kroc Center) will be creating on-site detention basins to collect all storm water runoff and discharge the flow at a rate that will not exceed pre-development conditions. The East Kapolei projects will also be providing storage and detention to meet the Rules Relating to Storm Drainage Standards with respect to water quality standards. The basin size could be decreased at some time in the future when the terminus of Kalo'i Gulch basin is finalized. All projects discharging to the Kalo'i Gulch basin currently have discharge restrictions and these restrictions will continue until the Kalo'i Gulch outlet is opened. Through implementation of the proposed drainage improvements, the planned developments in

East Kapolei are not expected to adversely impact existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Ocean Pointe, Villages of Kapolei and Makakilo.

Solid Waste. While many of the new residents in 'Ewa will have already been residing on O'ahu, there will be new residents attracted to and residing in Ho'opili who will be new to O'ahu. As O'ahu's population increases, the capacity of the Waimānalo Gulch Landfill will decrease. The issue of solid waste recycling and ultimate disposal will not only affect 'Ewa, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo, but every resident on O'ahu.

Roadways and Traffic. Ho'opili involves development of a mixed-use community on approximately 1,555 acres in East Kapolei. The Ho'opili Conceptual Land Use Plan ("Plan") reflects the desire for a community that is "complete" with: affordable living options; employment centers; quality schools; shopping, gathering and recreational places; and parks and open space for residents. Implementation of the Plan will allow residents the ability to live, work, learn, play, and shop within Ho'opili without needing to use personal motor vehicles on regional roadways.

Ho'opili will be connected to the surrounding 'Ewa District (and neighboring Department of Hawaiian Home Lands (DHHL), the University of Hawai'i at West O'ahu (UHWO), Kroc Center and the Hawaii Community Development Authority (HCDA) properties) by a network of closely-spaced gridded streets and bicycle paths within Ho'opili which allows a variety of circulation options for residents and visitors through East Kapolei. Wider tree-lined boulevards will create a distinct axis running north-south and diagonally east-west across the site, but unlike a conventional subdivision of cul-de-sacs, there will be many more streets, sized at a walking scale. Ho'opili is being designed to be transit-ready, and the land use plan, while subject to change, has been designed to accommodate a high-capacity transit corridor either along Farrington Highway or diagonally through the project site with either one or two transit station locations. While the proposed residential unit count will not change, the land use plan will need to be adjusted depending on the final alignment of the high-capacity transit corridor, as the potential for noise impact from an elevated high-capacity transit alignment would likely require taller, higher density residential or industrial uses along the alignment. The final siting of the transit station location(s) will also provide transit-oriented development potentials, which will also cause the plan to be refined, as higher intensity development (and density) will be concentrated around the transit station(s). Also possible is a transit maintenance and storage facility.

There are several major transportation projects that have been long-planned for East Kapolei. The Ho'opili project has been planned assuming that certain planned transportation projects will be constructed including a portion of North-South Road between Farrington Highway and Kapolei Parkway; a portion of the North-South Road/H-1 Freeway interchange; a portion of the intersection of North-South Road

and Farrington Highway; the long-planned widening of Farrington Highway fronting Ho'opi'i (and UHWO); the proposed East-West Connector Road through the Petition Area (that would connect Farrington Highway with Fort Weaver Road, through UHWO, DHHL East Kapolei Development Parcel 2 and Ho'opi'i); and the segment of the proposed Honolulu High-Capacity Transit Corridor project through the Petition Area.

Assuming that mitigation measures are implemented, the result of the analysis indicates that the Ho'opi'i project would result in what the traffic engineering consultant identifies as significant impacts to only one intersection under Scenario A: With Transit Corridor. Scenario: this would occur at Farrington Highway/Leokū Street. Under Scenario B: Without Transit Corridor Scenario, a total of three intersections are anticipated to result in what the traffic engineering consultant identifies as significant impacts as a result of the Ho'opi'i project: Farrington Highway/Leokū Street, Fort Weaver Road/Old Fort Weaver Road and Fort Weaver Road/Renton Road. Those residents surrounding the project sites, including, but not limited to, the communities of Waipahu, West Loch, Hanouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo who travel through the above identified intersections would be most impacted by the proposed project.

7.2.5. Impacts on Public Facilities and Services

Electrical and Communication Facilities. Steam units, diesel units, and gas turbines used to generate electricity also generate emissions and affect air quality. Any increase in demand for electricity not generated by renewable resources will have an indirect impact on air quality. Sustainability guidelines have been developed by UHWO. Sustainability options are being considered for the Ho'opi'i project.

Ho'opi'i project buildings, activities, and site grounds are planned to be designed with energy-saving considerations, and the project will strive to be consistent with the State's objective to promote cost-effective energy conservation through the adoption of energy-efficient practices and technologies. Due to the sunny climate, the Petition Area (and the rest of 'Ewa) will be suited for the use of renewable energy technologies including photovoltaics. In addition, based on the Department of Business, Economic Development & Tourism (DBEDT), Strategic Industries Division's recommendations, Ho'opi'i's mechanical and electrical consultants, in consultation with its sustainability consultant, will be directed to review the City and County of Honolulu's Energy Code early in the project and to consult with Hawaiian Electric Company, Inc. (HECO) on demand-side management programs that offer rebates for installation of energy-efficient technologies. The planned developments in East Kapolei are not expected to adversely impact the availability of energy for the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

The planned developments in East Kapolei will also increase the demand for communications services (i.e., cable television and telephone service), but are

unlikely to have an adverse effect on existing communications systems for the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

Recreational Facilities. The 'Ewa region is the fastest growing region in O'ahu, and the proposed developments in 'Ewa will help to meet the demand for additional recreational facilities. Parks will be provided by Ho'opi'i to meet the Petition Area's requirements of the City and County of Honolulu's Park Dedication Ordinance. New recreational facilities (i.e., tennis courts, basketball/volleyball courts, and jogging paths) within the UHWO campus are also planned for use primarily by students, faculty, and staff. Additionally, the private developer of UHWO's lands will provide recreational facilities in accordance with the City and County of Honolulu's Park Dedication Ordinance. The DHHL residential subdivision adjacent to and southwest of the Ho'opi'i community proposes 4.5 acres for park use and 10.7 acres for a community center to be developed and operated by the Salvation Army. The proposed center could include a swimming pool, performing arts center, child care center, gymnasium, education center, game and recreation areas, and other multi-use spaces. The facilities would be available to the general public.

Existing regional park facilities in West O'ahu, Central O'ahu, and Waipi'o may be visited by new residents of the East Kapolei developments; however, other park facilities have long been planned in Kalanetua. The planned developments in East Kapolei are not expected to adversely impact State and County parks used by residents of the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Hanouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

Medical Facilities. Health care services in the 'Ewa region are provided by Hawai'i Medical Center West (the nearest hospital facility), Pali Momi Medical Center, Wahiawa General Hospital, Kaiser Permanente Waipi'o Clinic, and the recently opened Kapolei Medical Park (located across the Kapolei Shopping Center at the corner of Farrington Highway and Fort Barrette Road). Other routine medical services can be obtained at major hospital facilities in urban Honolulu, about a 30-minute drive from the subject property. The City and County of Honolulu has 18 emergency medical services Advanced Life Support Ambulance units and two Rapid Response Paramedic units on O'ahu. Two of the Advanced Life Support Ambulance units are located nearby, one at the Kapolei Fire Station, the other at the Waipahu Fire Station. One of the Rapid Response Paramedic units is located at the nearby Hawai'i Medical Center West. The proposed UH West O'ahu student center is programmed to include a student health clinic.

The East Kapolei projects will increase the population of Kapolei, and as such, there will be an occasional and unavoidable demand for emergency medical services. It is unlikely, however, that this demand will impact the level of service provided to other residents of O'ahu. Existing medical and healthcare facilities in the 'Ewa region and surrounding areas should be able to accommodate the anticipated increase in

demand. The planned developments in East Kapolei are not expected to adversely impact the availability of medical facilities for the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

Educational Facilities. The UH West O'ahu adjacent to and west of the Ho'opili project will be a higher education institution in the 'Ewa region, enabling Leeward and Central O'ahu residents to obtain post-secondary degrees without commuting to the UH Mānoa campus or other higher education institutions in Honolulu.

The demand for educational facilities will increase as the population of 'Ewa grows. The Petitioner is setting aside land for three elementary schools, one middle school, and one high school with Ho'opili. UHWO has set aside land for an elementary school site near its southern boundary that might be shared by residents of the DHHL East Kapolei Development Parcel 1 project. The DHHL East Kapolei Development Parcel 2 project includes one elementary and one middle school sites. The State of Hawaii Department of Education (DOE) is also contemplating a high school on DHHL land immediately north of the UH West O'ahu site. Since the school-aged population is not constant, there is a possibility that not all of the above schools (a total of 2 high schools, two middle schools, and five elementary schools) will be needed after 20 to 25 years (the approximate time frame required for full build out of the combined East Kapolei projects. Through providing required public school sites (and the timely construction of schools by the State DOE), the planned developments in East Kapolei are not expected to adversely impact existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo. During the public review period, the DOE noted that "...the number of schools required for this project may change if the developer decides to increase residential densities per potential transit-oriented development (TOD) zoning."

Police Protection. East Kapolei is located within Honolulu Police Department (HPD) District 8, which encompasses the leeward coast and the 'Ewa Plain. There are approximately 100 field officers assigned to this district, and response time for the entire district fluctuates between five and seven minutes. In order to meet the growing needs of the 'Ewa Plain communities in 2000, the City and County of Honolulu opened the Regional Kapolei Police Station at 1100 Kamakila Boulevard.

The East Kapolei projects will increase the population of Kapolei and the demand for police service. According to the Ewa Development Plan, the 'Ewa Villages Substation is planned to service the East 'Ewa region, which includes East Kapolei. The service date for this substation has yet to be determined. The Petitioner is proposing a public facility site immediately mauka of Farrington Highway near the western portion of Parcel B for a use such as a police substation, fire station and/or emergency medical service (EMS) site. The planned developments in East Kapolei are not expected to adversely impact the availability of police protection for the existing surrounding communities, including, but not limited to, the communities of

Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

Fire Protection. Fire protection in the Ewa Development Plan Area is provided by the Honouliuli Fire Department (HFD) 'Ewa Beach Fire Station (an engine company), Makakilo Fire Station (an engine company), and Kapolei Fire Station (an engine and ladder company, and the Battalion 4 Headquarters). The Kapolei Fire Station located in Kapolei Business Park was completed in 1995 to serve the expanding development on the 'Ewa Plain.

The East Kapolei projects will increase the population of Kapolei and the demand for fire service. According to the Ewa Development Plan, to meet the projected population and economic growth in 'Ewa by 2020, three fire stations at 'Ewa Villages, Ko 'Olina, and Makahua Hills are planned, however service dates have yet to be determined. A new fire station is being planned on the DHHL East Kapolei Development Parcel 1 site near the intersection of Kapolei Parkway and North-South Road. The Petitioner is proposing a public facility site immediately mauka of Farrington Highway near the western portion of Parcel B for a use such as a fire station, EMS site and/or police substation. The planned developments in East Kapolei are not expected to adversely impact the availability of fire protection for the existing surrounding communities, including, but not limited to, the communities of Waipahu, West Loch, Honouliuli, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo.

5. The Petitioner has been coordinating with the State Department of Health (DOH) Hazard Evaluation & Emergency Response Office (HEER). Based on recent correspondence from HEER, the last two paragraphs of Section 4.5 Man-Made Hazards of the EIS will be revised to read as follows:

On March 13, 2008, in an interdepartmental memorandum from the DOH Hazard Evaluation & Emergency Response Office (HEER) to the DOH Environmental Planning Office, HEER wrote: "The land under consideration for development of the Ho'opili Project mixed residential/commercial community was formerly used to grow sugar cane. The Draft EIS acknowledges the presence of potential contamination, and investigative work is being coordinated with the HEER Office." The Petitioner is working with DOH on a sampling methodology to determine the presence and levels of certain pesticides. Subsequent actions will be based on the results of the sampling.

Based on sampling done on the adjacent DHHL property, no impacts from pesticide use on the former sugar cane cultivation of the Petition Area are anticipated. Since the Ewa Plain was once mostly under sugar cultivation and large areas have subsequently been developed for residential use without any apparent ill effects, it is anticipated that future residents in the Petition Area will not be exposed to unacceptable levels of pesticides from past or present agricultural activities. During the public review period, the HEER recommended that soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The scope of the investigative work is currently being coordinated with the HEER Office to ensure that the study will be carried out in the most efficient and effective manner possible.

6. As requested, information on the cost of the project will be expanded to include a breakdown of costs by component (onsite and offsite) and by development phase. Section 2.7 Development Timetable and Preliminary Costs of the Draft EIS will be revised to read as follows:

The Petitioner estimates that the development of the Ho'opili project (major off-site and on-site infrastructure improvements including grading, drainage, sewer, safe-drinking water, non-potable water, roadways, landscaping and improvements to Farrington Highway and North-South Road for access) will cost approximately \$4.6 billion (in Year 2007 dollars), spent over the project timeline of 2009 - 2030. During the public review period, both the Land Use Commission and the State Office of Planning made reference to subsection 15-15-50, Hawaii Administrative Rules (HAR). Subsection 15-15-50, HAR identifies the form and contents of a petition to the State Land Use Commission to amend the State Land Use District Boundaries, including representing "...that development of the subject property in accordance with the demonstrated need therefore will be accomplished before ten years after the date of commission approval. In the event full urban development cannot substantially be completed within such period, the petitioner shall also submit a schedule for development of the total of such project in increments together with a map identifying the location of each increment, each such increment to be completed within no more than a ten-year period." The construction of Ho'opili's development will be a challenging process that will require ongoing coordination between many fundamental parts. Infrastructure and road access, neighboring property development, demands of the commercial and housing markets, careful continued agriculture and general property management, and economic viability will all be

considered throughout the construction planning process. Furthermore, the City & County of Honolulu's (City) transit project, the largest public works endeavor in Hawai'i's history, will within Ho'opili have its longest traverse through privately owned property and further expand development challenges, undoubtedly in unprecedented ways. Many of these parts may involve developing different areas of the project site within the same construction timetable as discussed further below.

Several major development priorities include in no particular order:

- Water Service from the North. Both of Ho'opili's main potable water storage and transmission systems will reside mauka of H-1. Considerable investment will be required in the construction of tanks and transmission lines that will ultimately service two water zones within Ho'opili that roughly divide the site between northern and southern halves. (Necessary offsite utility easements have already been secured at a price.) Nonpotable water will be sourced from the reclamation operations at the Honolulu Wastewater Treatment Plant (WVTP), meaning it will be delivered to Ho'opili from the opposite end from where its potable source will come. Preliminary budgetary construction cost estimates range from between \$35 million to \$40 million with another \$20 million possible from BVS for service connections.

- Sewer Service from the South. Unlike Ho'opili's main water system, sewer service will come from the southern end of the property. The first of what is expected to be several Joint Development Agreements (JDA) to secure and construct wastewater transmission is in place with DHHL, UHWO, DLNR and the City and funded. Indeed, the DOT has already constructed this line as part of the North-South Road Phase 1A contract. Discussions are expected to commence later this year in earnest on separate JDAs for two additional segments. Nearly \$2 million has already been invested to date, preliminary budgetary cost estimates for these two JDAs range from \$10 million to \$15 million to stub service at the property's southwestern border, \$5 million to \$10 million to route through to the mauka area and as much as another \$60 million for the City's Department of Environmental Services user connection charges.

- Balancing Spread out Access, Initial Infrastructure Needs and Cash Flows. Today, Ho'opili's lands along the Farrington Highway corridor, its northernmost boundary, present Ho'opili's easiest access for construction purposes and future occupants. Once DHHL completes its section of the East-West Connector Road and the State DOT completes the North-South Road (both now under construction), Ho'opili will have construction and occupant access open at its southern and westernmost locations. This is significant because while available for development today, the Farrington Highway corridor is expected to present some of Ho'opili's greatest development challenges, predominantly the distance sewer lines will have to run through undeveloped land for service, as well as timing development to

Mr. Dan Davidson
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 24

the City's planned improvements to Farrington Highway itself. Thus, the Petitioner will look to mobilize on these other areas as early as practicable. Nonetheless, there are several key commercial parcels in this Farrington Highway corridor that will need to be among the earliest to be marketed in order to generate cash flow to support needed upfront utility (such as water and sewer as detailed above) and road infrastructure throughout Ho'opili. As a result, development should be started in more than one area from the onset. Over the built-out of the project, it is expected that as much as \$50 million to \$60 million could be spent on drainage systems and hundreds of millions will be invested in roadway systems servicing the project.

- *Balancing Job Generation, Appropriate Initial Housing Deliveries and Transit. The majority of the employment areas within Ho'opili are within the Farrington Highway corridor to the north of the property while the residential development areas that could be most sensible to develop first – the single-family areas – are to the south. Starting housing construction there could generally preserve higher density development in the areas in and around the transit corridor to the north to be better staged with transit's completion and more appropriately address the various demands it will create.*

- *Managing Agricultural Operations. As lands are moved into development over time, consideration will have to be given to the significant challenges of maintaining a working agricultural water system and providing ongoing and unencumbered vehicular access to crop areas. This will be no small task, as it will be the objective of the Petitioner to keep active farms onsite as long as practicable.*

As previously stated the development is expected to occur over approximately 20 years. This area of Ewa has long been planned for development (Kapolei Area Long Range Master Plan and Ewa Development Plan).

There are several major transportation projects that have been planned for Ewa. The Ho'opili project has been planned assuming that certain planned transportation projects will be constructed including a portion of North-South Road between Farrington Highway and Kapolei Parkway, a portion of the North-South Road and a new H-1 Freeway interchange, a portion of the intersection of North-South Road and Farrington Highway, the long-planned widening of Farrington Highway fronting Ho'opili, the proposed East-West Connector Road through the Petition Area, and the first segment of the proposed Honolulu High-Capacity Transit Corridor project through the Petition Area. As major off-site infrastructure (water, sewer, drainage, electrical and communications) would likely occur in most of the above major road right-of-ways, and the exact timing of the completion of these transportation improvements undetermined, it is difficult for the Petitioner to provide a map identifying the phasing of the proposed action in 10 year increments with any degree of certainty. While the phasing of development may be more relevant where there is little or no development, Ewa has

Mr. Dan Davidson
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 25

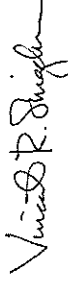
rapidly developed in recent years and proposed transportation improvements are indicative of State and County assumptions that this portion of Ewa would be eventually developed.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control



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

OFFICE OF PLANNING
235 South Beretani Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Ref. No. P-12106

April 8, 2008

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Ho'opili
D.R. Horton-Schuler Homes, LLC
Draft Environmental Impact Statement (DEIS)
'Ewa, Island of O'ahu
TMK(s): 9-1-17: 04 (port.), 059 and 072; and, 35; and
9-1-18: 001 and 004
State Land Use Commission Docket No. A06-771

Thank you for the opportunity to submit comments on the DEIS for the proposed Ho'opili development planned as a mixed use, transit-ready community to include residential, business and commercial areas, transit stops, schools, parks, and open space. The proposed development encompasses approximately 1,553 acres; all of which are proposed to be reclassified from the State Agricultural District to the State Urban District.

The following comments are offered to ensure that the final EIS provides a clear account for the user and decision-maker of site conditions, impacts of the proposed development as identified through studies and comments received in response to the preparation notice, development alternatives, and mitigation measures available. The comments include general observations as well as specific comments related to topic areas of interest to the State.

1. **Inclusion of information from comment letters and studies in the body of the final EIS; increased specificity of mitigation measures.**

The DEIS needs to be reviewed to determine where information provided in the appended comment letters and reference materials should be incorporated within the body of the final EIS. This will enable the reader to view the document and have a more thorough assessment of the potential impacts, alternatives, and mitigation measures

LINDA LINGLE
GOVERNOR
THEODORE E. LIU
COMMISSIONER
MARK K. ANDERSON
DEPUTY DIRECTOR
ABBEY SETH MAYER
OFFICE OF PLANNING
Telephone: (808) 557-2846
Fax: (808) 557-2822

Mr. Vincent Shigekuni
Page 2
April 8, 2008

required, without having to cross-reference and extract information contained in the appended materials. The sections, Assessment of the Human Environment, Potential Impacts and Mitigation Measures, and Contextual Issues in the final EIS should include the identification of key measures and techniques that can be used to mitigate impacts.

2. Development Timetable.

Table 2.3, Required Permits/Approvals, should be updated to provide estimated timeframes for the necessary permits and approvals. Further, on page 22, the project timeline is identified as 2009-2030. The State Land Use Commission (LUC) requires that projects seeking reclassification be substantially completed within ten years or seek incremental approvals. The final EIS should reference LUC rules (§15-15-50, Hawaii Administrative Rules), a schedule of development for each phase of the total project, and a map showing the location of each increment and the timing of each component.

3. Alternatives to the Proposed Action.

The analysis of alternatives in the DEIS, including the "no action" alternative, needs to be more detailed and better developed. The proposed Ho'opili project represents a substantial change to present conditions and therefore the baseline "no action" alternative deserves a more rigorous discussion as do other reasonable alternatives.

4. Energy.

Section 4.8.6, Electrical Facilities, provides an overview of existing and projected transmission infrastructure and generating facilities. The assumption being that Hawaiian Electric Company will be the primary provider of power for the development. Mitigation measures that might result in energy efficiency and demand reductions are given very cursory exploration and should be expanded to include discussion of U.S. Green Building Council's (GBC) Leadership in Energy and Environmental Design (LEED) certification, Hawai'i Green Built, and Zero-Net Energy Green Homes.

The DEIS does not discuss the U.S. GBC's LEED for Neighborhood Development (ND) pilot program to which the Ho'opili Project is a participant. The LEED-ND recognizes projects that successfully protect and enhance the overall health, natural environment, and quality of life of communities. The rating system which is used in the program encourages smart growth, promotes efficient energy and water use, and the location and design of neighborhoods to reduce transportation impacts. We understand that a separate consultant, Van Meter Williams Pollock, has been retained to shepherd the Ho'opili project through the LEED-ND certification process. The final EIS should include a preliminary overview of the LEED-ND features to be incorporated into the project using

the current U.S. GBC checklist for the program. Ho'opili is to be commended for pursuing LEED-ND certification during the pilot program period as an early adopter. Providing information on the measures to be incorporated in the project will aid government agencies, decision-makers, and the public in reviewing the project's development applications.

5. **Education.**

The State Department of Education (DOE) is responsible for determining the number of schools required to service a proposed development based on a formula contained in Chapter 302A, Hawaii Revised Statutes. The DEIS identifies the school fair-share requirements as an unresolved issue. The final EIS should provide specific information on the requirements as negotiated between the applicant and DOE.

Currently, the DEIS indicates the project's Conceptual Land Use Plan provides for up to five school sites. DOE has indicated some concerns with the potential traffic impacts of the proposed high school location along Farrington Highway, and the configurations of the lands set aside for school sites. These issues should be addressed in the final EIS.

6. **Agricultural lands.**

The project area is currently in the State Agricultural District and is zoned AG-1 Restricted Agricultural District by the County. The long-range plan for the area is for urban development as part of developing Kapolei as the Second City.

The project area contains approximately 1,500 acres in active agricultural uses on short-term leases. The majority of the project area is ALISH-designated as Prime, and rated A or B by the Land Study Bureau Land Classification system. The proposed development would appear to have a significant impact on the availability of important agricultural lands. Based on the figures provided in Section 3.4, Agricultural Impact, the loss of these high quality agricultural lands is roughly 10% of that available on Oahu. The final EIS should include some discussion about the displacement of the lessees and the location of alternative areas on the Island with comparable costs and access to resources.

7. **Housing.**

The supply of affordable housing to meet the needs of Hawaii's working families is critical to both the State and County. The final EIS should consider and discuss alternative configurations that might increase the affordable housing component and strategies for insuring the continued affordability of housing units developed.

8. **Public Health.**

The DEIS indicates the historic cultivation of sugarcane on the project's lands, as well as the current use for diversified agriculture. These activities have been linked to persistent, long-term chemicals used in cultivation that could pose a threat to public health and the environment. The final EIS should include a determination of the potential risks associated with past agricultural practices on the subject area and any remedial action that needs to be taken.

9. **Solid Waste.**

In the DEIS, Section 4.8.5, Solid Waste Disposal Facilities, does not provide any discussion on plans by the City and County of Honolulu to expand the Waimanalo Gulch Sanitary Landfill or the recent LUC decision to extend the deadline for closing that facility until November 2009. The final EIS should include a discussion of these factors and address the project's solid waste management options.

10. **Drainage.**

The final EIS should include a discussion of low impact development techniques that can be incorporated into the building and site design to improve stormwater management. The Hawaii Coastal Zone Management Program's publication, *Low Impact Development: A Practitioner's Guide (2006)*, provides examples of design techniques that offer alternatives to conventional drainage plans.

The DEIS identifies that the project is situated within three distinct drainage basins. One of which is Kalo'i drainage basin that has been the subject of considerable attention and currently has agreements in place with other landowners whose runoff may create impacts. The final EIS should reference the specific maximum discharge values that would be allowed into the Kalo'i drainage system, the structural features that will be employed to meet those restrictions, and whether the applicant has or will enter into agreements to abide by those limits.

Drainage from the subject property into the West Loch drainage basin is expected to be addressed through an agreement with the Navy to allow detention and flow on and across their lands. However, to date, the Navy has rejected this idea. The final EIS should provide a definitive answer from the Navy regarding this issue, or the alternative solution to construct sufficient on-site retention basins should be discussed in detail as the anticipated mitigation measure.



August 11, 2008

W. JEROME BRANDT, ASLA
Chairman

HOMANS WITLIN, ASLA
President

K. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, PASA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURKAM, AICP
Principal

TOM SCHILL, AICP
Senior Associate

KAYMONDY HIGA, ASLA
Senior Associate

KENYUN K. NISHIMAWA, ASLA
Associate

KIM MIKAMI UYEN, LL.M., AIP
Associate

SCOTT ALUKA AIBINGO
Associate

SCOTT MURKAM, ASLA
Associate

HONOLULU OFFICE
1001 Ala Moana Blvd., Suite 1500
Ala Moana Tower, Suite 1500
Honolulu, Hawaii 96813-2484
Tel: (808) 521-2631
Fax: (808) 521-1102
E-mail: spokane@pbrhawaii.com

HILLO OFFICE
1015 Alapai Street
Hilo, Hawaii 96720-3110
Hilo, Hawaii 96720-3203
Tel: (808) 961-3223
Fax: (808) 961-4183

WAILUKU OFFICE
1737 Wahi Pt. Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2875

Mr. Vincent Shigekuni
Page 5
April 8, 2008

11. Transportation.

Transportation challenges within the Ewa region are significant. The proposed Ho'opi'i project would be one of the last large-scale developments in the Second City of Kapolei. The State Department of Transportation has expressed ongoing concern regarding the regional traffic congestion along H-2, H-1, Kaemahameha Highway, Farrington Highway, Kunia/Fort Weaver Road, and the interchanges.

The DEIS provides some general discussion and the Traffic Impact Analysis Report included in the DEIS as Appendix L provides a more detailed analysis of anticipated impacts to public roadways. The final EIS should include an illustrative figure that identifies the specific roadways, intersections, and freeways that the Ho'opi'i project will impact, and for which Ho'opi'i will fund and/or construct mitigation measures.

The Office recommends using the final EIS process as a means to incorporate and use sustainable design and development practices in the proposed project. The Office of Environmental Quality Control's, *Guidelines for Sustainable Building Design in Hawaii*, and the U.S. GBC's LEED-ND pilot program offer guidelines and checklists for this purpose. The adoption of sustainable building and development practices has long-term economic, social, and environmental benefits to project developers, and Hawaii's residents and communities.

Thank you for the opportunity to review the DEIS and offer comments. The Office of Planning looks forward to receiving the Petitioner's final EIS. If you have any questions, please contact Scott Derrickson, AICP, of the Land Use Division at 587-2805.

Sincerely,

Abbey Seth Mayer
Director

c: Rodney Maille, LUC
Bryan Yee, AG
Katherine Puana Kealoha, OEQC

Mr. Abbey Seth Mayer, Director
Office of Planning
Department of Business, Economic Development & Tourism
State of Hawaii
P.O. Box 23559
Honolulu, Hawaii 96804

Attn: Mr. Scott Derrickson, AICP

SUBJECT: HO'OPI'I DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Mayer:

Thank you for your letter dated April 8, 2008. We have reviewed the State Office of Planning's letter and offer the following response to its comments.

1. Inclusion of information from comment letters and studies in the body of the final EIS; increased specificity of mitigation measures. As requested the DEIS will be reviewed to determine where information provided in the appended comment letters and reference materials should be incorporated within the body of the Final EIS. We respectfully disagree with the State Office of Planning's implication that the sections of the DEIS titled: "Assessment of the Human Environment, Potential Impacts and Mitigation Measures" and "Contextual Issues" do not include identification of key measures and techniques that can be used to mitigate impacts as even a cursory review would indicate otherwise.

2. Development Timetable. As requested, Table 2.3 Required Permits/Approvals of the EIS will be revised to include the estimated timeframes for the necessary permits and approvals (as follows).

period, both the Land Use Commission and the State Office of Planning made reference to subsection 15-15-50, Hawaii Administrative Rules (HAR). Subsection 15-15-50, HAR identifies the form and contents of a petition to the State Land Use Commission to amend the State Land Use District Boundaries, including representing "...that development of the subject property, in accordance with the demonstrated need, therefore will be accomplished before ten years after the date of commission approval. In the event full urban development cannot substantially be completed within such period, the petitioner shall also submit a schedule for development of the total of such project in increments together with a map identifying the location of each increment, each such increment to be completed within no more than a ten-year period." The construction of Ho'opili's development will be a challenging process that will require ongoing coordination between many fundamental parts. Infrastructure and road access, neighboring property development, demands of the commercial and housing markets, careful continued agriculture and general property management, and economic viability will all be considered throughout the construction planning process. Furthermore, the City and County of Honolulu's (City) transit project, the largest public works endeavor in Hawai'i's history, will within Ho'opili have its longest traverse through privately owned property and further expand development challenges, undoubtedly in unprecedented ways. Many of these plans may involve developing different areas of the project site within the same construction timetable as discussed further below:

Several major development priorities include in no particular order:

- Water Service from the North. Both of Ho'opili's main potable water storage and transmission systems will reside mauka of H-1. Considerable investment will be required in the construction of tanks and transmission lines that will ultimately service two water zones within Ho'opili that roughly divide the site between northern and southern halves. (Necessary offsite utility easements have already been secured at a price.) Nonpotable water will be sourced from the reclamation operations at the Honoaiuli Wastewater Treatment Plant (WWTP), meaning it will be delivered to Ho'opili from the opposite end from where its potable source will come. Preliminary budgetary construction cost estimates range from between \$35 million to \$40 million with another \$20 million possible from BWS for service connections.
- Sewer Service from the South. Unlike Ho'opili's main water system, sewer service will come from the southern end of the property. The first of what is expected to be several Joint Development Agreements (JDA) to secure and construct wastewater transmission is in place with DHHH, UHWO, DNR and the City and fauked. Indeed, the DOT has already constructed this line as part of the North-South Road Phase 1A contract. Discussions are expected to commence later this year in earnest on separate JDAs for two additional segments. Nearly \$2 million has already been invested to date, preliminary budgetary cost estimates for these two JDAs range from \$10 million to \$15 million to stub service at the property's southwestern border, \$5 million to \$10 million to route through to the mauka area and, as much as another \$60

Table 2.3. Required Permits/Approvals

PERMIT/APPROVAL	APPROVING AUTHORITY	STATUS	PROJECTED SUBMITTAL DATE
State Land Use District Boundary Amendment (with EIS)	State of Hawai'i Land Use Commission	Petition has been filed; processing on hold until EIS process has been completed.	First Quarter 2007
Zone Change	City and County of Honolulu Department of Planning and Permitting/City Council	Application to be filed assuming successful processing of SLUDBA.	Third Quarter 2009
Large Lot Subdivision Approval Action	City and County of Honolulu Department of Planning and Permitting	Application to be submitted after change the Zone Change application is approved.	Third Quarter 2010
National Pollutant Discharge Elimination System (NPDES) Permit	State of Hawai'i Department of Health	Application to be submitted prior to Building/Grading Permits.	2011
Building/Grading Permits	City and County of Honolulu Department of Planning and Permitting	Application to be filed after the Zone Change application is approved.	2011
Water Use Permit	State of Hawai'i Department of Land and Natural Resources, Commission on Water Resource Management	Application to be submitted prior to Building/Grading Permits	2011

Based on the State of Office of Planning's comments, the last paragraph of Section 2.7 Development Timetable and Preliminary Costs of the Draft EIS will be revised to read as follows:

The Petitioner estimates that the development of the Ho'opili project (major off-site and on-site infrastructure improvements including grading, drainage, sewer, safe-drinking water, non-potable water, roadways, landscaping and improvements to Farrington Highway and North-South Road for access) will cost approximately \$4.6 billion (in Year 2007 dollars), spent over the project timeline of 2009 - 2030. During the public review

million for the City's Department of Environmental Services uses connection charges.

- Balancing Spread out Access, Initial Infrastructure Needs and Cash Flows. Today Ho'opili's lands along the Farrington Highway corridor, its northernmost boundary, present Ho'opili's easiest access for construction purposes and future occupants. Once DHHL completes its section of the East-West Connector Road and the State DOT completes the North-South Road (both now under construction), Ho'opili will have construction and occupant access open at its southern and westernmost locations. This is significant because while available for development today, the Farrington Highway corridor is expected to present some of Ho'opili's greatest development challenges, predominantly the distance sewer lines will have to run through undeveloped land for service, as well as timing development to the City's planned improvements to Farrington Highway itself. Thus, the Petitioner will look to mobilize on these other areas as early as practicable. Nonetheless, there are several key commercial parcels in this Farrington Highway corridor that will need to be among the earliest to be marketed in order to generate cash flow to support needed upfront utility (such as water and sewer as detailed above) and road infrastructure throughout Ho'opili. As a result, development should be started in more than one area from the onset. Over the build-out of the project, it is expected that as much as \$50 million to \$60 million could be spent on drainage systems and hundreds of millions will be invested in roadway systems servicing the project.

- Balancing Job Generation, Appropriate Initial Housing Deliveries and Transit. The majority of the employment areas within Ho'opili are within the Farrington Highway corridor to the north of the property, while the residential development areas that could be most sensible to develop first – the single-family areas – are to the south. Starting housing construction there could generally preserve higher density development in the areas in and around the transit corridor to the north to be better staged with transit's completion and more appropriately address the various demands it will create.

- Managing Agricultural Operations. As lands are moved into development over time, consideration will have to be given to the significant challenges of maintaining a working agricultural water system and providing ongoing and unencumbered vehicular access to crop areas. This will be no small task, as it will be the objective of the Petitioner to keep active farms onsite as long as practicable.

As previously stated the development is expected to occur over approximately 20 years. This area of Ewa has long been planned for development (Kapolei Area Long Range Master Plan and Ewa Development Plan).

There are several major transportation projects that have been planned for Ewa. The Ho'opili project has been planned assuming that certain planned transportation projects will be constructed, including a portion of North-South Road between Farrington Highway and Kapolei Parkway; a portion of the North-South Road and a new H-1 Freeway interchange; a portion of the intersection of North-South Road and Farrington Highway; the long-planned widening of Farrington Highway from Ho'opili; the proposed East-West Connector Road through the Petition Area; and the first segment of the proposed Honolulu High-Capacity Transit Corridor project through the Petition Area. As major off-site infrastructure (water, sewer, drainage, electrical and communications) would likely occur in most of the above major road right-of-ways, and the exact timing of the completion of these transportation improvements undetermined, it is difficult for the Petitioner to provide a map identifying the phasing of the proposed action in 10-year increments with any degree of certainty. While the phasing of development may be more relevant where there is little or no development, Ewa has rapidly developed in recent years and proposed transportation improvements are indicative of State and County assumptions that this portion of Ewa would be eventually developed.

3. **Alternatives to the Proposed Action.** As requested, the "No Action" of Section 6.1 "No Action" Alternative of the Draft EIS will be revised to read as follows:

6.1 "NO-ACTION" ALTERNATIVE

The "no-action" alternative would not be consistent with stated governmental policies, which direct future growth to the Ewa region. The City and County of Honolulu General Plan states:

Encourage development within the secondary urban center at Kapolei and the Ewa and Central Oahu urban-fringe areas to relieve developmental pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.

Under this alternative, the site would remain as agricultural land, underutilized in terms of meeting the demand for residential homes (including affordable homes) and accompanying land uses. The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall. The demand for housing could result in the following scenarios or combinations thereof: there would be more pressure to develop in the other districts, including the rural areas and other areas currently used for cultivation;

there could be a demand for higher density housing in undeveloped areas of 'Ewa at a density not experienced to date; there would be more "doubling up" (larger number of persons per household, with more than one family under roof); those that are not willing to put up with the previously described scenarios may decide to relocate to the U.S. mainland where housing prices have dropped.

The "no-action" alternative was rejected because it is not consistent with government plans to develop Kapolei as the Second City.

4. Energy. Based on the State Office of Planning's comments, the eighth paragraph of Section 4.8.6 Electrical Facilities, Anticipated Impacts and Mitigation Measures of the Draft EIS will be revised to read as follows:

Based on DBEDT Strategic Industries Division's recommendations, the Petitioner's mechanical and electrical consultants, in consultation with its sustainability consultant, will be directed to review the City and County of Honolulu's Energy Code early in the project and to consult with Hawaiian Electric Company, Inc. (HECO) on demand-side management programs that offer rebates for installation of energy-efficient technologies (including solar power and energy-efficient appliances). During the public review period the State Office of Planning requested discussion of the following: the U.S. Green Building Council's (GBC) Leadership in Energy and Environmental Design (LEED) certification; Hawaii's Green Build, and Zero-Net Energy Green Homes.

U.S. Green Building Council's (GBC) Leadership in Energy and Environmental Design (LEED) Certification – According to the GBC website: "The Leadership in Energy and Environmental Design (LEED) Green Building Rating System encourages and accelerates global adoption of sustainable green building and development practices through the creation and implementation of universally understood and accepted tools and performance criteria. LEED is a third party certification program and the nationally accepted benchmark for the design, construction and operation of high performance green buildings. LEED gives building owners and operators the tools they need to have an immediate and measurable impact on their buildings' performance. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality." Even though State agencies are directed to implement LEED Silver to the extent possible under Chapter 196 of the Hawaii Revised Statutes, to date, there have only been a couple of projects built by the State of Hawaii's (Imiloa Astronomy Center, Waipahu Middle School Cafeteria, Hawaii Gateway Energy Center) so certified.

According to the GBC website: "The LEED for Neighborhood Development Rating System integrates the principles of smart growth, urbanism and green building into the first national system for neighborhood design. LEED certification provides independent, third-party verification that a development's location and design meet

accepted high levels of environmentally responsible, sustainable development. Currently in its pilot period, LEED for Neighborhood Development is a collaboration among USGBC, the Congress for the New Urbanism and the Natural Resources Defense Council. The pilot program is no longer accepting projects. The post-pilot version of the rating system, which will be available to the public, is expected to launch in 2009." Ho'opili is part of the LEED-ND pilot program, and it is in the early stages of working with the U.S. Green Building Council (USGBC) to obtain information required to implement LEED-ND to the extent that it is feasible and practicable.

A preliminary overview of LEED-ND features to be incorporated into the development project site include:

In order to reduce the impacts of urban sprawl or unplanned, uncontrolled spreading of urban development into areas outside of the metropolitan region, and create more livable communities, LEED for Neighborhood Development communities include:

- locations that are closer to existing town and city centers,
- areas with good transit access, and
- sites adjacent to existing development.

LEED for Neighborhood Development emphasizes the creation of compact, walkable, vibrant, mixed-use neighborhoods with good connections to nearby communities (such as UHWO and DHHL East Kapolei Development 2). Research has shown that living in a mixed-use environment within walking distance of shops and services results in increased walking and biking, which improve human cardiovascular and respiratory health and reduce the risk of hypertension and obesity.

LEED for Neighborhood Development also encourages increased transportation choice and decreased automobile dependence. These two things go hand-in-hand: convenient transportation choices such as buses, trains, car pools, bicycle lanes and sidewalks, for example, are typically more available near neighborhood centers and town centers, which are also the locations that produce shorter automobile trips. All of these concepts are being incorporated into the planning of the Ho'opili project.

Hawaii BuiltGreen™ Home Program – According to the DBEDT website: "The Hawaii BuiltGreen™ Program is a statewide program to make it easier for builders and homeowners to design and build energy- and resource-efficient homes in Hawaii. It includes hands-on, right-here-in-Hawaii examples of what to do and how to do it, such as a real home, exhibits, seminars, and workshops." According to the Building Industry Association website, there are no Hawaii BuiltGreen™ Award-winning housing projects built by the State of Hawaii's.

Zero-Net Energy Green Homes – According to Wikipedia: "A zero energy building (ZEB) or net zero energy building is a general term applied to a building with a net

energy consumption of zero over a typical year. Zero energy buildings are gaining considerable interest as a means to cut greenhouse gas emissions and conserve energy... There are many overlapping similarities between the goals of ZEB and GB [Green Buildings]. However, the subtle differences are significant, but diminishing, as scarce knowledge becomes more widespread."

The goal of ZEB design is the reduction and eventual elimination of energy bills and greenhouse gas emissions using potentially complex thermal physics necessary for zero energy design.

It is unlikely that there are any net zero energy housing projects built by the State of Hawaii."

5. Education. Unfortunately, we will be unable to provide specific information in the Final EIS on the requirements as negotiated between the Petitioner and the State Department of Education (DOE). During the public review period, DOE wrote: "Please revise the narrative to reflect that the DOE will determine the actual number of schools required for the Ho'opili development after the developer provides more definitive data on respective market prices, size, and number of bedrooms for each type of unit planned." Such information requested by DOE will not be available until after County zoning is approved.

We are in receipt of the public review comments from DOE on the Draft EIS and they did not indicate in writing any "...concerns with the potential traffic impacts of the proposed high school location along Farrington Highway, and the configurations of the lands set aside for school sites." DOE did however provide information on the desirable configuration for the various campus sites. Revisions to the master plan to accommodate such requests will be incorporated prior to a request for a change in County zoning. The third to the last paragraph of Section 2.5.1 *Ho'opili Conceptual Land Use Plan* of the Draft EIS will be revised to read as follows:

The proposed project could include as many as five public school sites. The Conceptual Land Use Plan shows the possible locations for five State Department of Education (DOE) school sites planned to be as accessible to the neighborhoods of Ho'opili as the community is developed; one high school, one middle school and three elementary schools. The plan can also accommodate private schools as the need is determined. In addition, area is set aside along the western end of Farrington Highway fronting the Petition Area for either a fire station or a police substation. In total, approximately 100 acres are allocated to meet public facility needs. The master plan will likely be adjusted prior to zoning to achieve DOE-desired public school campus site configurations.

6. Agricultural lands. Recently, the Petitioner has been working to assist the tenants in finding a suitable site or sites for relocation (as indicated on page 30 of the Draft EIS). However, to date, no site has been secured for that purpose. Given the planned growth in the region, the leases issued to the existing tenants reflected the fact that the area would be subject to urbanization in the future. The tenants all signed the leases with full knowledge

of the circumstances. In order to assist them in the short term consideration for the land and water were kept at or below market rates.

Hoopili: Impact on Agriculture (Appendix A of the Draft EIS Volume 2) identifies a total of 10,900 acres of former plantation land remaining on O'ahu which are available for other crops, including 3,150 acres of former pineapple land in Kunia and 7,750 acres on the North Shore. It is acknowledged that some of the higher elevation fields in Kunia and on the North Shore have less solar radiation than Ewa and lands in higher elevations incur higher pumping costs. Nevertheless, some limitations can be overcome with investment in improvements such as to existing water delivery systems.

7. Housing. Alternative configurations that might increase the affordable housing components were noted on pages 57 and 58 of the Draft EIS:

The majority of Ho'opili's 11,750 residential units would consist of for-sale multi-family homes. The Project will also include for-sale single-family units and multi-family rental units. Ho'opili's single-family units would be developed at approximately 5- to 8-units per net acre. Multi-family units will range from low-rise townhome units at approximately 10- to 14-units per acre, to mid-rise development at 30- to 50-units per acre.

The proposed housing will be in neighborhoods that integrate low- and medium-density or medium- and high-density residential areas. As a result, Ho'opili will cater to a range of income levels. In accordance with the City and County of Honolulu's affordable housing guidelines, up to 30 percent of the total number of units are expected to be developed as affordable housing units.

Affordable housing unit pricing will need to be coordinated with City and County of Honolulu departments, as pricing will be based on then-prevailing County rules and market conditions. The project is in the planning process so there may be an opportunity to identify a few house lots throughout the proposed project for the development of group homes for persons with special needs.

... In addition to home ownership opportunities, the project will provide commercial, educational, and recreational opportunities which will enable residents the opportunity to live, work, learn, play, and shop within the community.

Furthermore, the requirements for affordable housing on this island are set forth by the City and County of Honolulu and imposed by the City Council in unilateral agreements during the zoning process. In terms of addressing strategies for insuring the continued affordability of housing units to be developed, it is the Petitioner's intent is to comply with all legal requirements concerning affordable housing, including mandatory restrictions on transfer, sale/buyback and use.

8. Public Health. We acknowledge that residual pesticides in former agricultural lands could pose potential risks to human health and the environment in a residential setting. HEER

recommends that as part of the pre-development process, the soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The last two paragraphs of Section 4.5, *Man-Made Hazards, Anticipated Impacts and Mitigation Measures* of the Draft EIS will be revised to read as follows:

On March 13, 2008, in an interdepartmental memorandum from the DOH Hazard Evaluation & Emergency Response Office (HEER) to the DOH Environmental Planning Office, HEER wrote: "The land under consideration for development of the Ho'opi'i Project mixed residential/commercial community was formerly used to grow sugar cane. The Draft EIS acknowledges the presence of potential contamination, and investigative work is being coordinated with the HEER Office. The Petitioner is working with DOH on a sampling methodology to determine the presence and levels of certain pesticides. Subsequent actions will be based on the results of the sampling.

Based on sampling done on the adjacent DHHL property, no impacts from pesticide use on the former sugar cane cultivation of the Petition Area are anticipated. Since the Ewa Plain was once mostly under sugar cultivation and large areas have subsequently been developed for residential use without any apparent ill effects, it is anticipated that future residents in the Petition Area will not be exposed to unacceptable levels of pesticides from past or present agricultural activities. During the public review period, the HEER recommended that soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The scope of the investigative work is currently being coordinated with the HEER Office to ensure that the study will be carried out in the most efficient and effective manner possible.

9. **Solid Waste.** We appreciate the information provided, four new paragraphs will be added to the beginning of Section 4.8.5 *Solid Waste Disposal Facilities, Anticipated Impacts and Mitigation Measures* of the Draft EIS to read as follows:

On March 7, 2008, the State Land Use Commission agreed to allow the City and County of Honolulu's Waimanalo Gulch Sanitary Landfill to remain open for at least 18 more months. The City had sought a 24-month extension, through May 1, 2010.

Waste Management of Hawaii has operated the Waimanalo Gulch Sanitary Landfill as an integral part of the City's solid waste management infrastructure for approximately 20 years. The facility is heavily regulated, monitored and controlled by local, state and federal government agencies.

Before Mayor Hanemann took office, the City Council chose to keep the landfill in its current location, after evaluating a wide range of potential options.

Mayor Hanemann has noted that the recent emergency disposal of 28 tons of recalled beef at the landfill demonstrated that O'ahu will always need such a facility. However, the City and County of Honolulu is striving to decrease the amount of waste that's sent to the landfill, including: expanding the City's curbside residential

recycling program; shipping at least 100,000 tons of waste to a mainland facility, and expanding the H-Power garbage-to-energy plant.

10. **Drainage.** Based on the State Office of Planning's comments regarding Low Impact Development, the second to the last paragraph of Section 4.8.4 *Drainage Facilities, Anticipated Impacts and Mitigation Measures* of the Draft EIS will be revised to read as follows:

The project will increase impervious surfaces such as roadways, roofs, paved parking areas, and sidewalks. These surfaces will cause an increase in storm water discharge within the Petition Area. However, detention basins and/or retention basins are being planned and sited to detain and/or retain storm water to ensure that areas downstream of the project are not impacted. Based on comments received from the City and County of Honolulu Department of Facilities Management during the public review period, storm drainage detention and retention basins within the project site shall be privately-owned and maintained, unless particular parcels of land are dedicated to or acquired by the government. During the public review period, the State Office of Planning requested a discussion of low impact development techniques that can be incorporated into the building and site design to improve stormwater management. Table 1.1 of Low Impact Development: A Practitioner's Guide (2006) lists specific Low Impact Development (LID) best management practices (BMP's) and techniques.

- Preservation of Undisturbed Areas: As recommended, most of the existing undisturbed areas (or uncultivated) areas will be preserved, because the gulches and steeper sloped areas are unsuitable for development. Most of the project area is highly developable, but has been highly disturbed from past and present agricultural cultivation.
- Preservation of Buffers: Naturally vegetated buffers will be defined, delineated and preserved along Honouliuli Gulch.
- Reduction of Clearing and Grading: Clearing and grading of the site will be limited to the minimum amount for the development function, road access and infrastructure.
- Locating Sites in Less Sensitive Areas: Most of the Petition Area is highly developed and does not include sensitive resource areas such as floodplains, steep slopes, wetlands, mature forests or critical habitats.
- Open Space Design: While the project will be more densely developed than most of the projects in the Villages of Kapolei or the rest of Ewa, this project acknowledges that there are very limited areas on O'ahu left to develop and this will allow other areas in Central O'ahu, North Shore, Ko'olanua, Ko'alaupoko and Wai'anae to remain undeveloped.
- Roadway Reduction: The proposed traditional neighborhood design and pedestrian-friendly development concept proposes more but narrower roads than a conventional development, to: 1) ensure lower vehicle speeds; 2) enhance pedestrian safety in crossing the streets; and 3) facilitate safer bicycle travel.
- Sidewalk Reduction: The proposed pedestrian-friendly and traditional

- neighborhood design development concept proposes meeting minimum standards for sidewalks to: 1) enhance greater pedestrian use, and 2) facilitate safer bicycle travel for children and inexperienced adult bicyclists. Impervious surfaces could be reduced by consolidating separate pedestrian and bicycle paths into multi-modal paths.
- Driveway Reduction: The proposed development will strive to minimize driveway lengths and widths to reduce overall imperviousness.
- Cul-de-sac Reduction: The proposed pedestrian-friendly, traditional neighborhood design development concept seeks to avoid cul-de-sacs to increase connectivity within the project and to surrounding communities.
- Building Footprint Reduction: The proposed transit-oriented development concept is not adverse to taller buildings to reduce the impervious footprint of buildings while recognizing the visual appearance of Kaneohe.
- Parking Reduction: The proposed mixed-use, pedestrian-friendly and transit-oriented development concept is supportive of reducing the current off-street parking requirements and reducing the overall imperviousness associated with parking lots.
- Vegetated Buffer/Filter Strips: Where feasible, runoff will be directed to open space buffers to treat and control stormwater runoff from developed areas.
- Open Vegetated Channels: Where feasible, property designed and constructed vegetated channels will be provided to convey runoff, but it is unlikely that will occur along streets dedicated to the City and County of Honolulu.
- Bioretention and Rain Gardens: Where feasible, bioretention and rain gardens will be provided.
- Infiltration: Where feasible, infiltration trenches, basins or leaching chambers will be provided.
- Roofing Runoff Reduction Mitigation: Where feasible, runoff will be directed from rooftops to pervious areas.
- Stream Dewatering for Redevelopment Projects: Not applicable because there are no previously-culverted/gained streams to "daylight" to restore natural habitats.
- Tree Planting: The proposed project will include street trees, park landscaping and project landscaping to reduce stormwater runoff and provide shade.

In regards to Kalo'i Gulch, as noted on page 90 of the Draft EIS:

With respect to the portion of the project within the Kalo'i drainage basin, the project will be creating on-site detention basins to collect all storm water runoff and discharge the flow at a rate that will not exceed pre-development conditions. The project will also be providing storage and detention to meet the Rules Relating to Storm Drainage Standards with respect to water quality standards. The basin size could be decreased at some time in the future when the terminus of Kalo'i basin is finalized. All developed projects discharging to the Kalo'i basin currently have

discharge restrictions and these restrictions will continue until the Kalo'i basin terminus is finalized. The portions of the project within the Kalo'i drainage basin are Parcels A and the western most part of Parcel C adjacent to the North-South Roadway alignment (See Figure 4.2: Drainage Basins). The Petitioner will continue to coordinate with County and State agencies to discuss issues within the Kalo'i Gulch Watershed.

Negotiations between the Petitioner and the Navy regarding the referenced Makai Detention parcels are ongoing. However, please note that the proposed project does not "hinge" upon outlet for the makai detention basin through Navy lands. As noted on page 91 of the Draft EIS, if the outlet is not permitted by the Navy:

The alternative drainage solution if the overflow across Navy property cannot be resolved is to construct retention basins on site holding back the total volume of a 100 year, 24 hour storm. These basins would be located on the southern portion of Parcel C.

11. Transportation. The Petitioner acknowledges that the project is also obligated to provide for and/or implement the traffic mitigation measures and road/highway improvements determined necessary by the DOT Highways Division. We note, however, that the Highways Division is still in the process of concluding its review of the development plan and TIAR for the subject project. As such, the Petitioner will continue to coordinate with the DOT Highways Division on identifying the specific roadways, intersections and portions of freeways that the proposed project may impact, and for which the Petitioner will fund in part and/or construct mitigation measures.

In addition, the Petitioner acknowledges that the project is obligated under the applicable City & County of Honolulu ordinance to participate in and contribute to the Ewa Impact Fee for transportation improvements. This was noted in the third to the last paragraph of Section 4.8.1 *Transportation, Anticipated Impacts and Mitigation Measures* of the Draft EIS.

We concur that OEQC's *Guidelines for Sustainable Building Design in Hawaii* and the USGBC's LEED - ND pilot program provide guidelines for sustainable design and development practices, but the EIS process is intended disclose the impacts of a project. We believe such details are best addressed prior to detailed site planning.

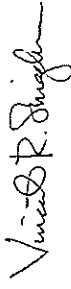
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

Mr. Abbey Seth Mayer
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 14

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Keulohu, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

0:\4625293.01 DK1\Horton-E\Kapsale\EIS\Final EIS\Final EIS Response Letters\BL-37 OP Response.doc

LINDA LIRGLE
GOVERNOR

MAJOR GENERAL ROBERT G. F. LEE
DIRECTOR OF CIVIL DEFENSE

EDWARD T. TEIXEIRA
VICE DIRECTOR OF CIVIL DEFENSE



STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4465

March 31, 2008

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

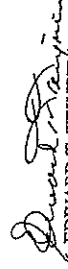
Dear Mr. Shigekuni:

Draft Environmental Impact Statement
Ho'opili Ewa, Oahu, Hawaii

Thank you for the opportunity to comment on this development. After careful review of the documents for this development, we request that the developer install at least three outdoor warning sirens. As the development plans are finalized, State Civil Defense (SCD) will be better able to define the placement and size of the sirens. At the present time SCD personnel recommends that the minimum-size siren have a sound rating of 121-decibels @ 100 feet, omnidirectional and solar powered. Enclosed Figure 2-9, Conceptual Land Use Plan map for the approximate location of the siren coverage area, is marked in red to denote the developer installed sirens in the subdivision, while the black circles denote the existing sirens. (Note: The circles are approximate coverage areas only.)

If you have any questions, please call Mr. Norman Ogasawara, Assistant Telecommunications Officer, at 733-4300, ext. 531.

Sincerely,



EDWARD T. TEIXEIRA
Vice Director of Civil Defense

Enc.

c: Mr. Rodney Maile, State of Hawaii Land Use Commission
Department of Emergency Management, City and County of Honolulu
State Civil Defense Radio Shop



PHONE (808) 733-4300
FAX (808) 733-4287



August 11, 2008

MR. EDWARD T. TEIXEIRA, Vice Director of Civil Defense
State of Hawaii
Department of Defense
Office of the Director of Civil Defense
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

Atttn: Mr. Norman Ogasawara

Chairman
THOMAS S. WITLEN, ASLA
President

R. SHAN DUNCAN, ASLA
Executive Vice-President

RUSSELL X. CHUNG, P.E., P.A.
Executive Vice-President

VINCENT SHIGIKUNI
Vice-President

GRANT T. MURAKAMI, AICP
Principal

TOM SCHINDLER, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMMIKAMI YUEN, LEED AP
Associate

SCOTT ALIKA, AIBICO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1 Bishop Street
Suite 500
Honolulu, Hawaii 96813-3484
Tel: (808) 521-5641
Fax: (808) 521-1182
E-mail: sp@pbrhawaii.com

HILLO OFFICE
101 Apunani Street
Suite 110
Hilo, Hawaii 96720-4264
Tel: (808) 960-3233
Fax: (808) 960-1583

WAILUKU OFFICE
2700 Waihi Dr. Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2875

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Teixeira:

Thank you for your letter dated March 31, 2008. We have reviewed your letter and offer the following response to your comments.

1. We acknowledge the State Civil Defense's (SCD) request that the developer install at least three outdoor warning sirens, with a minimum-size siren sound rating of 121-decibels @ 100 feet, omni-directional and solar powered. The applicant will continue to coordinate with the SCD as development plans are finalized to be better able to define the placement and size of the sirens.

A new paragraph will be added to the end of Section 3.6 of the EIS to read as follows.

During the public review period of the Draft EIS, the State Civil Defense (SCD) commented that "the developer install at least three outdoor warning sirens... At the present time SCD personnel recommends that the minimum-size siren have a sound rating of 121-decibels @ 100 feet, omni-directional and solar powered." SCD also noted that "As the development plans are finalized, State Civil Defense (SCD) will be better able to define the placement and size of the sirens." The Petitioner will continue to coordinate with the SCD as development plans are finalized to be better able to define the placement and size of the sirens.

2. Thank you for providing your revised Conceptual Land Use Plan map illustrating the approximate locations for the placement of the sirens.

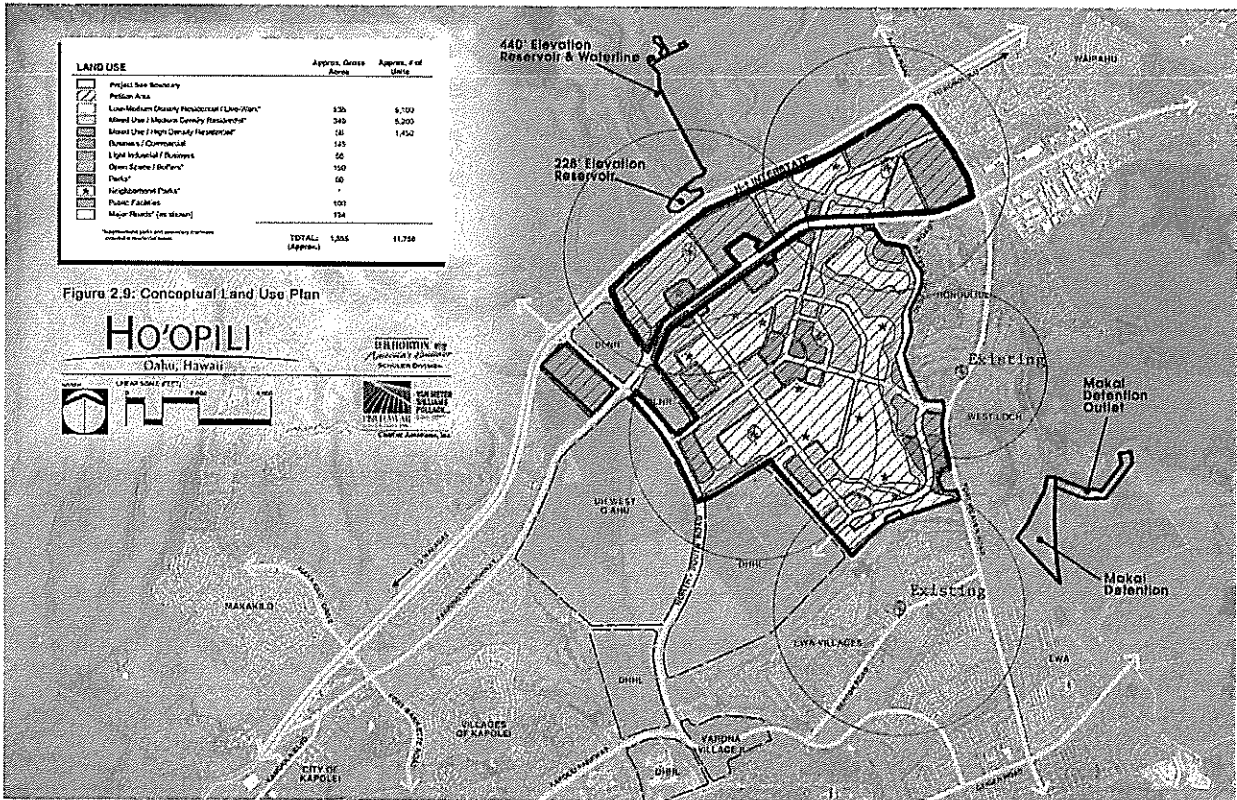


Figure 2.9: Conceptual Land Use Plan

HO'OPILI
Oahu, Hawaii

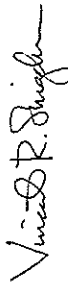


Mr. Edward T. Teixeira
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\o\6252303.01 DR Heron-E Kapele\EIS\Final EIS\Final EIS Response Letters\BL-10 State DOD Response.doc



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2359
HONOLULU, HAWAII 96824

RECEIVED
APR 04 2008
PBR HAWAII

OFFICE OF THE SUPERINTENDENT

April 3, 2008

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

SUBJECT: Draft Environmental Impact Statement (DEIS) for Ho'opili, Ewa District, Oahu

The Department of Education (DOE) has reviewed the Draft Environmental Impact Statement (DEIS) for Ho'opili. We have the following comments:

Page xii, Executive Summary, Unresolved Issues, State of Hawaii Department of Education School Fair-Share Requirements: Please revise the narrative to reflect that the DOE will determine the actual number of schools required for the Ho'opili development after the developer provides more definitive data on respective market prices, size, and number of bedrooms for each type of unit planned.

Page 48, Section 4.3, Noise, Anticipated Impacts and Mitigation Measures, Operational Noise: Schools should not be located at sites where noise levels exceed 65 dBA.

Page 73, Section 4.8.1 Transportation, Anticipated Impacts: Please address the traffic impacts of locating a high school site along Farrington Highway. The DOE wonders why the traffic analysis did not refer to school traffic impacts in identified locations.

Pages 98-99, Section 4.9.1, Educational Facilities, Existing Conditions: The DOE does not understand why there is a discussion about the average size of some, but not all, schools constructed between 1997 and 2007. Different schools are designed for different enrollment sizes, and once schools open, enrollments change over time. Campus sizes also vary. Historical averages do not determine school design standards.

Page 99, Anticipated Impacts and Mitigation Measures: The DOE questions the appropriateness of stating that a high school in Ho'opili would "attract" residents from areas outside the project.



August 11, 2008

W. FRANK BRANDENJANLA
Chairman

HONMARK WITTLIN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, PASIA
Executive Vice-President

VINCENT SHIGEKUMI
Vice-President

GRANT MURAKAMI, AICP
Principal

TOM SCHILL, AICP
Senior Associate

RAYMOND THIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMIKAWA YUEN, LEED AP
Associate

SCOTT LAIKA, AURIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
821 Bishop Street
ANE Tower, Suite 650
Honolulu, Hawaii 96813-3484
Tel: (808) 521-2631
Fax: (808) 521-1102
E-mail: opinion@pbrhawaii.com

HIO OFFICE
101 August Street
Suite 310
Hilo, Hawaii 96720-2803
Tel: (808) 941-3233
Fax: (808) 941-6893

WAILUKU OFFICE
1707 Wai Pa Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Mr. Vincent Shigekumi
Page 2
April 3, 2008

If the DEIS is referring to high school students, as opposed to home buyers, the DOE determines the attendance area for new schools and has a policy for the granting of geographic exceptions.

Page 226, Section 7, Contextual Issues, Section 7.2.5 Impacts on Public Facilities and Services, Educational Facilities: Please add a sentence in this section that the number of schools required for this project may change if the developer decides to increase residential densities per potential transit-oriented development (TOD) zoning.

The DOE's Educational Specifications state that the length to width ratio of school campuses should not exceed 2.5 to 1. We are concerned that the present ratio of the high school campus is 3.15 to 1. A long, narrow campus would constrain plans for the layout of the future high school. The DOE specifically requests a reevaluation of the shape of the high school campus.

The three elementary school campuses come close to, but do not exceed, the 2.5 to 1 ratio. If it is possible to make the elementary site more square in configuration, we believe there would be more options in planning the facilities on those sites. The configuration of the middle school site is sufficient.

Finally, it is noted that a meeting was held on March 12, 2008, with D.R. Horton - Schuler Division representatives. Preliminary estimates of the educational impacts of the development were discussed.

Should you have any questions, please call Heidi Meeker of the Facilities Development Branch at 377-8307.

Very truly yours,

Patricia Hamamoto
Superintendent

PH:jmb

- cc: Randolph Moore, Assistant Superintendent, OSFSS
- Duane Kashiwai, Public Works Administrator, FDB
- Mamo Carreira, CAS, Campbell/Kapolei/Waianae Complex Areas
- Rodney Maile, Acting Director, Land Use Commission
- Katharine P. Kealoha, Director, Office of Environmental Quality Control

Ms. Patricia Hamamoto, Superintendent
State of Hawai'i
Department of Education
P.O. Box 2360
Honolulu, Hawai'i 96804
Attn: Ms. Heidi Meeker

SUBJECT: HO'OPIHI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Hamamoto:

Thank you for your letter dated April 3, 2008. We have reviewed your letter and provide the following responses:

Page xii, Executive Summary, Unresolved Issues State of Hawaii Department of Education (State DOE) School Fair Share Requirements. As requested, the narrative of the EIS will be revised to read as follows:

The Petitioner is currently coordinating with the State DOE regarding the number of schools that will be required for the development of the Ho'opihi project. During the Draft EIS public review period, the DOE commented that it will determine the actual number of schools required for the Ho'opihi development after the developer provides more definitive data on respective market prices, size, and number of bedrooms for each type of unit planned. This will be identified as an unresolved issue until the number of schools required is finalized.

Page 48, Section 4.3, Noise, Anticipated Impacts and Mitigation Measures, Operational Noise. The last paragraph in this section of the EIS will be revised to read as follows:

The Exterior noise levels at two school sites (H-1 Freeway/Kunia Road and Farrington Highway) will exceed the Hawaii State Board of Education (BOE) Policy 6700 noise limit of L10 = 65 dBA (before mitigation). During the Draft EIS public review period, the DOE commented that schools should not be located at sites where noise levels exceed 65 dBA. Policy 6700 requires that air conditioning be provided to schools that are exposed to exterior noise levels in excess of the noise limit. The layout and construction of the school should be carefully designed such that exterior noise will not disturb learning activities and interfere with speech intelligibility. To reduce ambient noise levels at the school site, traffic noise mitigation measures may also be necessary, such as an earthen berm or noise barrier wall, or siting the buildings along high noise-generating roadways to essentially serve as noise barriers.

...A high school will be attractive to certainly attract residents from areas outside of Ho'opili. This does not include the possibility that one or two private schools may be included in Ho'opili. If a planned private school(s) is built within the project, this will increase educational choices for local families. UHWO will offer higher education opportunities for regional residents.

Page 226, Section 7, Contextual Issues, Section 7.2.5 Impacts on Public Facilities and Services, Educational Facilities. As requested, the narrative of the EIS will be revised to read as follows:

The demand for educational facilities will increase as the population of 'Ewa grows. The Petitioner is setting aside land for three elementary schools, one middle school, and one high school with Ho'opili. UHWO has set aside land for an elementary school site near its southern boundary that might be shared by residents of the DHHL East Kapolei Development Parcel 1 project. The DHHL East Kapolei Development Parcel 2 project includes one elementary and one middle school sites. The State of Hawaii Department of Education (DOE) is also contemplating a high school on DHHL land immediately north of the UH West O'ahu site. Since the school-aged population is not constant, there is a possibility that not all of the above schools (a total of 2 high schools, two middle schools, and five elementary schools) will be needed after 20 to 25 years (the approximate time frame required for full build out of the combined East Kapolei projects. Through providing required public school sites (and the timely construction of schools by the State DOE), the planned developments in East Kapolei are not expected to adversely impact existing developments, including, but not limited to, the communities of Waipahu, West Loch, Honolulu, 'Ewa Villages, 'Ewa Villages of Kapolei and Makakilo. During the public review period, the DOE noted that "...the number of schools required for this project may change if the developer decides to increase residential densities per potential transit-oriented development (TOD) zoning."

We appreciate the information provided on the desirable configuration for the various campus sites. Revisions to the master plan to accommodate such requests will be incorporated prior to a request for a change in County zoning. The third to the last paragraph of Section 2.5.1. Ho'opili Conceptual Land Use Plan of the EIS will be revised to read as follows:

The proposed project could include as many as five public school sites. The Conceptual Land Use Plan shows the possible locations for five State Department of Education (DOE) school sites planned to be as accessible to the neighborhoods of Ho'opili as the community is developed; one high school, one middle school and three elementary schools. The plan can also accommodate private schools as the need is determined. In addition, area is set aside along the western end of Farrington Highway fronting the Petition Area for either a fire station or a police substation. In total, approximately 100 acres are allocated to meet public facility needs. The master plan will likely be adjusted prior to zoning to achieve DOE-desired public school campus site configurations.

Page 73, Section 4.8.1 Transportation, Anticipated Impacts. Please refer to the last paragraph of page 4-3 of the Traffic Impact Analysis Report (TIAR) which is in Appendix L of the DEIS. When the vehicle trips from the proposed project were estimated, the traffic engineering consultant included the estimated number of trips anticipated to be generated by the proposed schools. The estimated numbers of trips generated by school uses are shown on Tables 4-1 and 4-2 of the TIAR. No revisions to the text of the EIS are proposed.

Pages 98-99, Section 4.9.1, Educational Facilities, Existing Conditions. The information provided on these pages of the Draft EIS was an attempt to provide a historical context to show how many acres may be "exacted" from the Petitioner to address impacts to public schools. We concur that historical averages should not determine school design standards, especially as: 1) land values have skyrocketed, 2) residents have become more used to higher density and vertical development; and 3) new developments in professional planning practice have changed from the mindset of protecting residential uses from commercial uses to finding mixed residential and commercial uses as more desirable. The narrative of the EIS will be revised to read as follows:

For planning purposes the DOE assumes an enrollment of 550 students per elementary school, 600 students per middle school, and 1,600 students per high school. However, in 2007, the Hawaii State Legislature passed Act 245 regarding impact fees for schools. Act 245 defines "Recent School Construction Averages" as the department's historical average acres required and enrollment capacity for elementary (K-5), middle (6-8), and high (9-12). Based on existing school construction data, the historical average design standards are as follows:

Table 4-14- Existing School Construction Data

SCHOOL TYPE	ACRES/SCHOOLS	ENROLLMENT/SCHOOLS	ACRES/STUDENT
Elementary School	72.5	800 students	.0156-acre
Middle School	16.5	1,500 students	.0110-acre
High School	49.0	1,600 students	.0306-acre

During the Draft EIS public review period, the DOE commented that "Different schools are designed for different enrollment sizes, and once schools open, enrollments change over time. Campus sizes also vary. Historical averages do not determine school design standards." The Petitioner concurs and proposes to provide a total of 90 acres throughout out the project site that can be planned by DOE for public schools. The Petitioner is working with the DOE so that the larger land area campuses are sited away from mixed-use developments. Schools fitting within a single-block can be sited in higher density areas.

Page 99, Anticipated Impacts and Mitigation Measures. Thank you for pointing out the possible misinterpretation of the noted sentence. The sentence in question will be revised to read as follows:

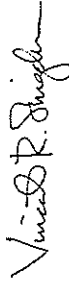
Ms. Patricia Hamamoto
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

We acknowledge that the Petitioner has met with DOE on several occasions (the latest meeting on March 12, 2008) to discuss preliminary estimates of the educational impacts of the project as well as the location of proposed school sites.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kenloha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\06\525252.01 DR Horton-E Kapolei\EIS\Final EIS\Final EIS Response Letters\BL-11 DOE Response.doc

LINDA JINGLE
SECRETARY
STATE OF HAWAII



RECEIVED

APR 22 2008

PBR HAWAII

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

PO BOX 1879
HONOLULU, HAWAII 96818

MICHAEL KANE
CHAIRMAN
HAWAIIAN HOME OWNERS
KULUANANI PARK
DEPARTMENT OF HAWAIIAN
HOME LANDS
HONOLULU, HAWAII
96818

April 15, 2008

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, HI 96813

Dear Mr. Shigekuni:

Subject: Ho'opili, Oahu
Draft Environmental Impact Statement

Thank you for allowing us to review and comment on the subject Draft Environmental Impact Statement (DEIS). We apologize for submitting our comments after the posted deadline.

The Department of Hawaiian Home Lands (DHHL) offers its support of the proposed project. Construction activities and the retail and industrial components of the Ho'opili master-planned community will give our homestead lessees in Kapolei and the Leeward Coast the opportunity to work close to home.

The DHHL shall continue to cooperate with the D.R. Horton - Schuler Division (Horton) in the development of off-site wastewater collection infrastructure and roadway inter-connectivity between our developments.

Our primary concern with the proposed plan is the potential need for additional access to the North-South Road at the boundary of the subject project site and DHHL's East Kapolei II. There is an existing sixty-foot easement along that boundary, which DHHL intends to develop into a roadway of approximately the same width. We encourage Horton to reserve a similar amount of land on their property for future widening of the roadway.



August 11, 2008

W. FRANK BRANDI, ASLA
Chairman

J. MASS, WITLEN, ASLA
President

R. STAN DUNGAN, ASLA
Executive Vice-President

RUSSELL CHONG, P.A.S.A.
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT J. MURAKAMI, AICP
Principal

TOM GINELLI, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. MINIHAWA, ASLA
Associate

KIMBERLY YEN, LEED AP
Associate

SCOTT AIKIA, AIBICO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1101 Bishop Street
5th Floor, Suite 500
Honolulu, Hawaii 96813-2884
Tel: (808) 521-5631
Fax: (808) 521-1102
E-mail: ypaum@pbrhawaii.com

HILO OFFICE
101 August Street
Hilo, Hawaii 96720-6106
Tel: (808) 961-3223
Fax: (808) 961-5887

WAILUKU OFFICE
1787 Wai Pu Lele, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Mr. Vincent Shigekuni
April 15, 2008
page 2

It would be very helpful to have a map to accompany the internal street descriptions in section 4.8.1 (page 71).

Please call Mr. Darrell Ing in our Land Development Division at 587-6451 if you have any questions.

Aloha and mahalo,

Micah A. Kane, Chairman
Hawaiian Homes Commission

c: Office of Environmental Quality Control

Mr. Micah A. Kane, Chairman
Hawaiian Homes Commission
State of Hawai'i
P.O. Box 1879
Honolulu, Hawai'i 96805

Attn: Mr. Darrell Ing

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Chairman Kane:

Thank you for your letter dated April 15, 2008 and for your stated support for the proposed project. The Petitioner is extremely grateful for the cooperative effort in developing off-site wastewater collection infrastructure and planning for roadway interconnectivity between the DHHL and Ho'opili projects.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

G:\Job\5295958.01 DR Hirono-E Kapiolani\Final EIS\Final EIS Response Letters\BIR-32 DHEIL_Response.doc



LINDA LURGEL
GOVERNOR OF HAWAII

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96811-3378

April 2, 2008

CHRYSTLE L. ELLIOTT, M.D.
DIRECTOR OF HEALTH

In reply, please refer to:
EPO-08-028

Mr. Shigekuni
April 2, 2008
Page 2

Mr. Vincent Shigekuni, Vice President
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

SUBJECT: Draft Environmental Impact Statement (DEIS) for the Ho'opi'i Project
Ewa, Oahu, Hawaii
TMK: (1) 9-1-017: 004 and others; 1,533.844 acres

Thank you for allowing us to review and comment on the subject application. The document was routed to the various branches of the Department of Health (DOH) Environmental Health Administration. We have the following Clean Water Branch, Waste Water Branch, Clean Air Branch, Indoor and Radiological Health Branch, and General comments.

Clean Water Branch

The Department of Health, Clean Water Branch (CWB), has reviewed the subject document and offers these comments on your project. Please note that our review is based solely on the information provided in the subject document and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at <http://www.hawaii.gov/health/environmental/envy-planning/landuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:

- a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
- b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
- c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2. You are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

- a. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities.
- b. Treated effluent from leaking underground storage tank remedial activities.
- c. Once through cooling water less than one (1) million gallons per day.
- d. Hydrotreating water.
- e. Construction activity dewatering.
- f. Occasional or unintentional discharges from recycled water systems.
- g. Storm water from a small municipal separate storm sewer system.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/geni-index.html>.

3. For types of wastewater discharges not listed in Item 2 above or wastewater discharging into Class 1 or Class AA waters, you may need to obtain an NPDES individual permit. Class 1 waters include, but is not limited to, all State waters in natural reserves, preserves, sanctuaries, and refuges established by the Department of Land and Natural Resources (DLNR) under Hawaii Revised Statutes (HRS), Chapter 195, or similar reserves for the protection of aquatic life established under HRS, Chapter 195.

An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/indiv-index.html>.

4. You must also submit a copy of the NOI or NPDES permit application to the State DLN R, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the CWB that SHPD has or is in the process of evaluating your project. Please submit a copy of your request for review by SHPD or SHPD's determination letter for the project along with your NOI or NPDES permit application, as applicable.

5. Page ix of the Executive Summary states: "A grading permit is required to modify the topography, and additionally, a National Pollutant Discharge Elimination System (NPDES) permit will be required prior to construction to address non-point source discharges." The NPDES permit is for point source discharges of pollutants to State waters.

6. Appropriate Best Management Practices (BMPs) must be implemented when disturbing and/or remediating areas contaminated with dioxin, arsenic, or other pollutants. These BMPs must isolate and confine contaminated work areas and ensure compliance with the State's Water Quality Standards (WQS).

7. State waters (including Kaloai Gulch) require the best degree of treatment upland and prior to discharge. State waters shall not be used as treatment. Constructing storage structures and detention basins in State waters is prohibited.

8. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 Water Quality Certification are required, must comply with the WQS. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

If you have any questions, please visit our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the Engineering Section, CWB, at 586-4309.

Waste Water Branch

The document proposes the development of a mixed use community in Ewa -- complete with employment centers, quality schools, shopping, gathering and recreational places and parks and open space for residents.

The project is located in the Critical Wastewater Disposal Area (CWDA) where no new cesspools will be allowed. It is also located in the Pass Zone.

We have no objections to the proposal and offer our recommendation for approval as the domestic wastewater needs of the project will be handled by connection to the Honouliuli Wastewater Treatment Plant (WWTP) (as stated that the Petitioner has contributed towards increasing the capacity of the Makakio/Kapolei Interceptor sewers to the Honouliuli WWTP).

We further encourage the developer to work with the County to utilize recycled wastewater for irrigation and other non-potable water purposes in open space and landscaping areas.

All wastewater plans must meet Department's Rules, HAR Chapter 11-62 "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. If you have any questions, please contact the Planning & Design Section of the Wastewater Branch at 586-4294.

Clean Air Branch

Fugitive dust emissions occur during all phases of construction and operations. Activities close to existing residences, businesses, public areas or thoroughfares can cause dust problems. For cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance problems. We recommend that the contractors operate under a dust control management plan. The plan does not require the Department of Health approval, however it will help with identifying and minimizing the dust problems from the proposed project.

Examples of measures that can be included in the dust control plan are:

- a) Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Providing an adequate water resource at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing dust from shoulders and access roads;
- e) Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling dust from debris being hauled away from the project site.

All activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. If you have any questions, please contact the Clean Air Branch at 586-4200.

Mr. Shigekuni
April 2, 2008
Page 5

Indoor and Radiological Health Branch

Project activities shall comply with the Administrative Rules of the Department of Health, Chapter 11-46, Community Noise Control. Should there be any questions, please contact Russell S. Takata, Environmental Health Program Manager, Indoor and Radiological Health Branch, at 586-4701

General

We strongly recommend that you review all of the Standard Comments on our website: www.state.hi.us/health/environmental/env-planning/landuse/landuse.html. Any comments specifically applicable to this project should be adhered to.

If there are any questions about these comments please contact Jiakai Liu with the Environmental Planning Office at 586-4346.

Sincerely,



KELVIN H. SUMADA, MANAGER
Environmental Planning Office

c: EPO
CW/B
WW/B
CAB
IRH



August 11, 2008

W. FRANK BRANDT, JASLA
Chairman

THOMAS S. WHITEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, FASMA
Executive Vice-President

YINGYEN SHIGEKUNI
Vice-President

GRANT T. MURAKAMI, AICP
Principal

TOM SCHINELL, AICP
Senior Associate

RAYMOND J. HIGA, ASLA
Senior Associate

KELVIN K. NISHIKAWA, ASLA
Associate

KUMIKO KAWAYUEN, LEED AP
Associate

SCOTT ALKAAH BRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1001 Ala Moana Blvd.
4th Floor, Suite 1450
Honolulu, Hawaii 96813-2184
Tel: (809) 521-5631
Fax: (809) 521-1102
E-mail: spokane@pbrhawaii.com

HILO OFFICE
101 Aupuni Street
Hilo, Hawaii 96720-2403
Tel: (808) 963-3223
Fax: (808) 963-1833

WAILUKU OFFICE
1742 W. H. Pa. Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2025

Mr. Kelvin H. Sumada, Manager
Environmental Planning Office
State of Hawai'i
Department of Health
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

Attn: Mr. Jiakai Liu

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Sumada:

Thank you for your letter dated April 2, 2008 (your reference: EPO-08-028). We have reviewed your letter and offer the following responses to your comments:

Clean Water Branch

1. The proposed project will comply with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55.

2. A National Pollutant Discharge Elimination System (NPDES) permit is required. The need for this permit is stated in the Final EIS on page xiv (Listing of Permits and Approvals Required) and Table 5.9 (Required Permits/Approvals).

At the appropriate time during the NPDES permit preparation process, the Clean Water Branch will be contacted, and a Notice of Intent will be submitted at least 30 days before the commencement of activities requiring the NPDES permit.

3. If it is determined to be required, an individual NPDES permit will be obtained. We understand that an application for an individual NPDES permit must be submitted at least 180 days before commencement of construction activities.

4. A copy of the NPDES permit application will be submitted to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD) for review.

5. Page xi of the Executive Summary (previously page ix in the Draft EIS) will be revised as follows:

A grading permit is required to modify the topography, and additionally, a National Pollutant Discharge Elimination System (NPDES) permit will be required prior to construction to address non-point source discharges.

6. Best Management Practices will be implemented to isolate and confined contaminated work areas and be in compliance with the State of Hawaii's Water Quality Standards (WQS).
7. The proposed project is being planned to include detention basins and/or retention basins to detain and/or retain storm water to ensure that areas downstream of the project are not impacted.
8. We acknowledge that all discharges related to the project construction or operation activities must comply with the WQS.

Waste Water Branch

We acknowledge that the wastewater generated from the project will be disposed of through the connection to the City & County Sewer Service System. As recommended, the Petitioner will work with the City and utilize recycled water for irrigation and other non-potable water purposes in the open spaces and for landscaping areas to the extent practicable. All wastewater plans will conform to applicable provisions of Chapter 11-62, HAR "Wastewater Systems," and the DOH Wastewater Branch reserves the right to review the detailed wastewater plans for conformance to applicable rules.

The following text will be added after the last paragraph of Section 4.8.3 *Wastewater Facilities, Anticipated Impact and Mitigative Measures* of the EIS:

All wastewater plans will conform to applicable provisions of Chapter 11-62, HAR "Wastewater Systems," and the DOH Wastewater Branch reserves the right to review the detailed wastewater plans for conformance to applicable rules. In addition, the Petitioner will work with the Board of Water Supply and utilize recycled water for irrigation and other non-potable water purposes in the open spaces and for landscaping areas to the extent practicable.

Clean Air Branch

We concur that there is a significant potential for fugitive dust emissions during construction and greatly appreciate the information provided. We have revised the first paragraph of Section 3.3 *Soils, Anticipated Impacts and Mitigation Measures* of the EIS to read as follows:

During project construction, there is a potential for soil loss through the generation of dust and water-borne soil erosion as areas are graded. All grading operations will be conducted in accordance with dust and erosion control and other requirements of the City and County of Honolulu Grading Ordinance and all applicable provisions regulating Fugitive Dust set forth under Section 11-60.1-33, HAR regarding. A NPDES permit will also be required prior to construction to address construction-related runoff. Additionally, a watering program will be implemented during construction to minimize soil loss through fugitive dust emission. During the public review period, the Department of Health (DOH) Clean Air Branch (CAB) recommended that a dust control management be prepared. The DOH CAB also provided additional examples of measures that can be implemented during construction.

- where possible, for areas involving mixed land uses, buffer zones be established to alleviate potential dust nuisance problems;
- planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- providing an adequate water resource and watering program at the site prior to start-up of construction activities;
- landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- minimizing dust from shoulders and access roads;
- providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- controlling dust from debris being hauled away from the project site.

In addition, during the public review period, the Office of Hawaiian Affairs wrote: OHA recommends cleaning job-site construction equipment and establishing groundcover as quickly as possible after grading with native or endemic drought tolerant species. In addition to landscaping and watering programs, other mitigation measures suggested include:

- Early construction of drainage control features;
- Construction of temporary sediment basins to trap silt, where needed;
- Use of temporary berms and cut-off ditches where needed; and
- Use of temporary silt fences (coir works well) or straw bales to trap silt.

Indoor and Radiological Health Branch

Project activities will comply with Chapter 11-46, HAR (Community Noise Control). We have revised the first paragraph of Section 4.3 *Noise, Anticipated Impacts and Mitigation Measures, Construction Noise* of the EIS to read as follows:

Noise will be generated by construction and earth-moving equipment during the project's development. However, over the life of the project, depending where development will occur, construction noise will be relatively short-term, occur only during daytime hours, and comply with DOH noise regulations Chapter 11-46, HAR (Community Noise Control). Noise impacts will only be heard on margins of the Petition Area that border sensitive land uses, such as existing residential uses on the eastern boundary (minimal development is currently contemplated along Old Fort Weaver Road) and the southern boundary (buffered by the 'Ewa Villages Golf Course) of the Petition Area. In general, the Petition Area is surrounded by roads or open space; thus there are relatively few current residents that would be impacted by construction noise. There are no adjacent schools or hospitals to the Petition Area.

The third paragraph of Section 4.3 *Noise, Anticipated Impacts and Mitigation Measures, Operational Noise* of the EIS has been revised to read as follows:

The project is designed to have higher densities than the existing Villages of Kapolei, and as such, will present similar ambient noise conditions as might be expected where a mix of

multi-family residential and commercial uses occur. Noise mitigation measures will be incorporated into the project design to prevent such impacts, such as installing landscaping, and installing mufflers and/or erecting barriers around noisy mechanical equipment (such as air conditioning). Consideration will be given to the layout of the commercial areas to meet State Department of Health noise regulations and reduce the noise impact. It is expected that the Petitioner will likely include restrictions on hours of operations on commercial uses in order to minimize the impact of potential noise producing uses such as bars and nightclubs or indoor recreational land uses. Project activities will comply with Chapter 11-46, HAR (Community Noise Control).

General

The following responses are offered to the Standard Comments on your website: <http://www.state.hi.us/health/environmental/eivc-planning/landuse/landuse.html> for the Environmental Planning Office:

- Waterbody type and class: The proposed project is located within three distinct drainage basins: Kalo'i Stream, Hunehune Stream and West Loch. The proposed project does not contain any other wetlands, streams, or known waterbodies onsite.
- National Pollutant Discharge Elimination System (NPDES): A NPDES permit is required for this project. The need for this permit is stated in Table 5.9 of the EIS. The Drainage Master Plan is attached as an Appendix O of the EIS.
- Water quality management: A Drainage Master Plan has been prepared and is attached as Appendix O of the EIS. The proposed drainage system calls for detention basins to help mitigate and filter runoff generated onsite. The drainage system is summarized in Section 4.8.4 *Drainage Facilities* of the EIS.
- Impaired waters of Hawai'i: No water bodies on the current 2004 List of Impaired Waters in Hawai'i Prepared under Clean Water Act Section 303 (d) are expected to be impacted by the proposed project.
- We acknowledge your suggestion that we identify and analyze potential project impacts at a watershed scale. Section 4.8.4 *Drainage Facilities, Anticipated Impacts and Mitigation Measures* of the EIS and the Drainage Master Plan describe the proposed drainage system which include detention basins that are consistent with your recommendation to implement alternative and green engineering solutions to mitigate runoff and improve water quality and the project's potential impact on aquatic and riparian ecosystems.

The following responses are offered to the Standard Comments for the Hazard Evaluation and Emergency Response Office:

- We are in receipt of a memorandum dated March 13, 2008 from Mr. Harold Lao from the State of Hawai'i Department of Health Hazard Evaluation & Emergency Response Office (HEER), recommending that as part of the pre-development process,

the soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The first and second paragraphs of Section 4.5, *Man-Made Hazards, Anticipated Impacts and Mitigation Measures of the EIS* will be revised as follows:

On March 13, 2008, in an interdepartmental memorandum from DOH Hazard Evaluation & Emergency Response Office (HEER) to the DOH Environmental Planning Office, HEER wrote: "The land under consideration for development of the Ho'opi'i Project mixed residential/commercial community was formerly used to grow sugar cane. The Draft EIS acknowledges the presence of potential contamination, and investigative work is being coordinated with the HEER Office." The Petitioner is working with DOH on a sampling methodology to determine the presence and levels of certain pesticides. Subsequent actions will be based on the results of the sampling.

Based on sampling done on the adjacent DHHL property, no impacts from pesticide use on the former sugar cane cultivation of the Petition Area are anticipated. Since the Ewa Plain was once mostly under sugar cultivation and large areas have subsequently been developed for residential use without any apparent ill effects, it is anticipated that future residents in the Petition Area will not be exposed to unacceptable levels of pesticides from past or present agricultural activities. During the public review period, the HEER recommended that soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The scope of the investigative work is currently being coordinated with the HEER Office to ensure that the study will be carried out in the most efficient and effective manner possible.

We offer the following responses to the Standard Comments for the Clean Air Branch:

- Construction/Demolition Involving Asbestos: Since the majority of the site is currently undeveloped, cultivated for many years for sugarcane, and most recently for diversified agriculture, it is not expected that there may be asbestos on site. However, if asbestos is found, the applicant or subsequent developers will contact the Asbestos Abatement Office in the Noise, Radiation and Indoor Air Quality Branch prior to construction/demolition.
- Control of Fugitive Dust: Discussion of this issue and proposed mitigation measures are provided in Section 3.3 *Soils, Anticipated Impacts and Mitigation Measures* of the EIS.

We offer the following responses to the Standard Comments for the Clean Water Branch:

- In their review of the Environmental Impact Statement Preparation Notice, the Army Corps of Engineers wrote it was unable to provide a determination whether a Department of Army permit would be required for the proposed project. An application for jurisdictional determination will be submitted to the Army Corps of Engineers.

Mr. Kelvin H. Sunada
SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 6

- A National Pollutant Discharge Elimination System (NPDES) permit is required. The need for this permit is stated in the Final EIS on page xiv (Listing of Permits and Approvals Required) and Table 5.9 (Required Permits/Approvals).

At the appropriate time during the NPDES permit preparation process, the Clean Water Branch will be contacted, and a Notice of Intent will be submitted at least 30 days before the commencement of activities requiring the NPDES permit.

If it is determined to be required, an individual NPDES permit will be obtained. We understand that an application for an individual NPDES permit must be submitted at least 180 days before commencement of construction activities.

- A copy of the NPDES permit application will be submitted to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD) for review.
- In response to your comments, the last paragraph of Section 4.8.4 *Drainage Facilities, Anticipated Impacts and Mitigative Measures* has been revised as follows:

Surface water quality can be impacted through development. Per comments received by the State Department of Health, Clean Water Branch, any discharges related to project construction or operation activities shall comply with the applicable State Water Quality Standards as specified in Chapter 11, 54, HAR. Further, the DOH Clean Water Branch wrote that the Hawaii Revised Statutes, Section 342D-50(a) requires that "[n]o person, including any public body, shall discharge any water pollutants into state waters, or cause or allow any water pollutant to enter state waters except in compliance with this chapter, rules adopted pursuant to this Chapter, or a permit or variance issued by the director." The project will need to obtain NPDES permits and Grading Permits (as previously identified in the DEIS). Both required permits have substantial effort identified in their applications specifically addressing BMP issues. The substantive parts of the permitting processes focus on BMP roads and monitoring. Features will include stabilized gravel entrances, siltation berms, diversion of storm water around work areas, use of detention basins, diversion swales, filter traps at catch basins, calculation of soils losses meeting acceptable levels and monitoring plans. BMP's are an important part of current construction practice. The project will be providing detention basins to meet City and County of Honolulu Standards for water quality treatment. Structural methods may also be used to meet water quality requirements of the Rules Relating to Storm Drainage Standards. Structural methods include the use of Stormceptor® type storm drain manholes.

We offer the following responses to the Standard Comments for the Safe Drinking Water Branch:

Mr. Kelvin H. Sunada
SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 7

- Public Water Systems: Discussion of this issue and proposed mitigation measures are provided in Section 4.8.2 *Water Supply Facilities* of the EIS.
- Underground Injection Control: No underground injection wells are proposed for this project.
- Groundwater Protection Program: No 9- or 18-hole golf courses are proposed for this project.

We offer the following responses to the Standard Comments for the Solid and Hazardous Waste Branch:

- Detailed discussion on solid waste management for the project is provided in Section 4.8.5 *Solid Waste Disposal Facilities* of the EIS.

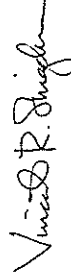
The Standard Comments for the Wastewater Branch listed on your website are the same as the comments included in your letter and are answered above.

For Noise, Radiation, and Indoor Air Quality Branch Standard Comments, the proposed project will comply with the Administrative Rules of the Department of Health.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\Jok2\2003.01 DR Horton-E Kapolei\EIS\Final EIS Response Letters\BL-16 DOI Response.doc

LINDA LANTILE
GOVERNOR OF HAWAII



CHIYOME LEINA'ALA FUKINO,
M.D., DIRECTOR OF HEALTH

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

In reply, please refer to:
PH#: 08-064 RP

March 13, 2008

TO: Kelvin Sunada, Manager
Environmental Planning Office

FROM: Harold Lao
Hazard Evaluation & Emergency Response Office (HEER)

SUBJECT: Comments from HEER for the Draft EIS for the proposed Ho'opili Project, Ewa, Oahu, Hawaii

HDOH, 2006, *Proposed dioxin action levels for East Kapolei Brownfield Site* (March 2006):
Hawai'i Department of Health, Office of Hazard Evaluation and Emergency Response,
<http://www.hawaii.gov/health/environmental/hazard/cal2005.html>

HDOH, 2007, *Use of laboratory batch tests to evaluate potential leaching of contaminants from soil* (April 2007): Hawai'i Department of Health, Office of Hazard Evaluation and Emergency Response, <http://www.hawaii.gov/health/environmental/hazard/cal2005.html>

HDOH, 2007, *Pesticides in former agricultural lands and related areas - Updates on investigation and assessment* (August 2007): Hawai'i Department of Health, Office of Hazard Evaluation and Emergency Response, <http://www.hawaii.gov/health/environmental/hazard/cal2005.html>

The land under consideration for development of the Ho'opili Project mixed residential/commercial community was formerly used to grow sugar cane. The Draft EIS acknowledges the presence of potential contamination, and investigative work is being coordinated with the HEER Office.

Residual pesticides in former agricultural lands could pose potential risks to human health and the environment in a residential setting. As part of the pre-development process, HDOH recommends that soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated.

Detailed guidance for the investigation of former agricultural lands is currently under preparation. Interim guidance is presented in the HEER office documents referenced below. The HEER office recommends that the developer initiate an environmental investigation of the former agricultural lands as early in the process as possible. Preparation of investigation work plans should continue to be coordinated with the HEER office to ensure that the study is carried out in the most efficient and effective manner possible.

References:

HDOH, 2005, *Screening For Environmental Concerns at Sites With Contaminated Soil and Groundwater* (May 2005): Hawai'i Department of Health, Office of Hazard Evaluation and Emergency Response, <http://www.hawaii.gov/health/environmental/hazard/cal2005.html>

HDOH, 2006, *Soil Action Levels and Categories for Bioaccessible Arsenic* (August 2006):
Hawai'i Department of Health, Office of Hazard Evaluation and Emergency Response,
<http://www.hawaii.gov/health/environmental/hazard/cal2005.html>



August 11, 2008

KE FRANK RYANBYT, FLSA
Chairman

THOMAS W. HINES, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL J. CHUNG, FLSA A
Executive Vice-President

VINCENT HUGGERLIN
Vice-President

GRANT E. MERRIAM, MCP
Principal

TOM SCHINELL, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

MIYUKI NISHIKAWA, ASIA
Associate

KIMI MIKAMI, AIA, LEED AP
Associate

SCOTT ALINA, AIA, AIA
Associate

SCOTT MUKAWAH, ASIA
Associate

HONOLULU OFFICE

1551 Bishop Street, 6th
Floor, Honolulu, HI 96813
Honolulu, Hawaii 96813-4364
Tel: (808) 521-5631
Fax: (808) 528-1462
E-mail: sp@pbrhawaii.com

HILO OFFICE

101 Aupuni Street
Hilo, Laguna Center, Suite 210
Hilo, Hawaii 96720-7162
Tel: (808) 951-3143
Fax: (808) 951-4990

WAIKUKU OFFICE

1255 Wilikoua Street, Suite 4
Waikuku, Hawaii 96758-1271
Tel: (808) 742-2878

Mr. Kelvin H. Sunada
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\04\2008\03\03.01 DR Licenses-E Kapele\HEER\Final EIS\Final EIS Response Letter\01_28 DOH HEER Response.doc

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Sunada:

We are in receipt of a memorandum dated March 13, 2008 (your reference: 08-064 RP) from Mr. Harold Lao from the State Department of Health Hazard Evaluation & Emergency Response Office (HEER). We have reviewed the memorandum and offer the following responses to HEER's comments:

We acknowledge that residual pesticides in former agricultural lands could pose potential risks to human health and the environment in a residential setting. HEER recommends that as part of the pre-development process, the soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The second paragraph of Section 4.5, *Man-Made Hazards, Anticipated Impacts and Mitigation Measures* of the Final EIS will be revised to read as follows:

Based on sampling done on the adjacent DHHL property, no impacts from pesticide use on the former sugar cane cultivation of the Petition Area are anticipated. Since the Ewa Plain was once mostly under sugar cultivation and large areas have subsequently been developed for residential use without any apparent ill effects, it is anticipated that future residents in the Petition Area will not be exposed to unacceptable levels of pesticides from past or present agricultural activities. During the public review period the HEER recommended that soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The scope of the investigative work is currently being coordinated with the HEER Office to ensure that the study will be carried out in the most efficient and effective manner possible.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809



PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Attention: Mr. Vincent Shigekuni
Gentlemen:

Subject: Draft Environmental Impact Statement for Ho'opi'i

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comment.

Other than the comments from Engineering Division, Division of Forestry & Wildlife, Land Division, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,

Morris M. Atta
Administrator

February 22, 2008

MEMORANDUM

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

FROM: Morris M. Atta
SUBJECT: Draft Environmental Impact Statement for Ho'opi'i
LOCATION: Ewa, Oahu, TMK: (1) 9-1-17; por 4, 59, 72; 9-1-18-1, 4; 9-1-10-2, por 14, 15; 9-1-17; por 4; 9-2-1-4, 5, 6, 7; 9-2-2:2
APPLICANT: PBR Hawaii

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2008.

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

Attachments

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

Signed:
Date: 3/23/08

RECEIVED
LAND DIVISION

2008 MAR 25 P 3 41

MAIL ROOM
STATE OF HAWAII
LAND DIVISION

08 FEB 23 PM 03:42 EST ENTERING



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 22, 2008

MEMORANDUM

TO:

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

FROM: *D Morris M. Aita*
 SUBJECT: Draft Environmental Impact Statement for Hoopi
 LOCATION: Ewa, Oahu, TMK: (1) 9-1-17:por 4, 59, 72; 9-1-18:1, 4; 9-1-10:2, por 14, 15; 9-1-17:por 4; 9-2-1:4, 5, 6, 7; 9-2-2:2
 APPLICANT: PBR Hawaii

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2008.

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

Attachments

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

Signed: *kk*
 Date: 3/24/08



DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/MorrisAita
Ref: DEA/Hoopii/PBR
Maul.398

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones X, A, and AE. The National Flood Insurance Program does not have any regulations for developments within Zone X; however, it does regulate developments within Zones A and AE as indicated in bold letters below.
- () Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is also located in Zone _____.
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is _____.
- (X) 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 Tsau-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:
 - (X) Mr. Robert Sumiomo at (808) 768-8097 or Mr. Mario Su Li at (808) 768-8098 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 water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- () 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: _____

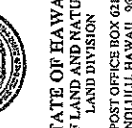
Should you have any questions, please call Ms. Suzie S. Agram of the Planning Branch at 587-0258.

Signed: *Suzie S. Agram*
 ERIC T. HIRANO, CHIEF ENGINEER
 Date: 3/23/08

RECEIVED
 LAND DIVISION
 2008 MAR 24 A 11:24
 MAIL ROOM
 1500 KALANIANA'OLA
 AVENUE
 HONOLULU, HI 96813



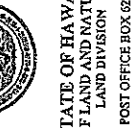
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 61
HONOLULU, HAWAII 96809



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 61
HONOLULU, HAWAII 96809



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 61
HONOLULU, HAWAII 96809



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 61
HONOLULU, HAWAII 96809

MEMORANDUM

TO: Morris M. Atta
Acting Administrator

FROM: Keith Chun

DATE: March 20, 2008

SUBJECT: Request for comments on Draft EIS for Ho'opili
Ewa, Oahu, Hawaii; TMK (1) 9-1-17: por 4, 59, 72; 9-1-18: 1, 4; 9-1-10:2; por
14; 15; 9-1-17: por 4; 9-2-1; 4, 5, 6, 7; 9-2-2:2

MEMORANDUM

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

Thank you for the opportunity to review and provide comments on the above mentioned draft EIS. Our comments regarding this application are provided below:

1. DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opili project. These DLNR lands (identified by TMK: (1) 9-1-16:08; (1) 9-1-17:86; and (1) 9-1-18:03 & 05) are all within the State Land Use Urban District boundary and designated as High Density Residential, Community Commercial Center and Transit Node (High Density Residential and Commercial) in the City & County of Honolulu Planning Department's Ewa Development Plan dated August 1997.

The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (H-1 Freeway, Farrington Highway, North-South Road) and the City's proposed transit line as well as the substantial increase in development projects in the area. Consequently, regional infrastructure should take into consideration the potential development of the DLNR parcels, and DLNR requests that it be included in the planning and design of any regional infrastructure in the area that would serve the DLNR parcels.

If you have any questions, please call Gavin Chun at 587-0385. Thank you.

From: ~~TO:~~

To: ~~FROM:~~

Morris M. Atta

TO: Morris M. Atta
Draft Environmental Impact Statement for Ho'opili
SUBJECT: Ewa, Oahu, TMK: (1) 9-1-17:por 4, 59, 72; 9-1-18:1, 4; 9-1-10:2, por 14, 15; 9-1-17:por 4; 9-2-1:4, 5, 6, 7; 9-2-2:2
APPLICANT: PBR Hawaii

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2008.

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

Attachments

- () We have no objections.
- (X) We have no comments.
- () Comments are attached.

Signed: *[Signature]*
Date: *2/13/08*

LAURA H. TRIZLEN
BOARD OF LAND AND NATURAL RESOURCES
COMMISSIONER FOR WATER RESOURCES MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 22, 2008

RECEIVED
LAND DIVISION
2008 FEB 27 P 3:26
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

MEMORANDUM

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

FROM: *Paul Conry*
 SUBJECT: Draft Environmental Impact Statement for Ho'opili
 LOCATION: Ewa, Oahu, TMK: (1) 9-1-17-por 4, 59, 72; 9-1-18-1, 4; 9-1-10-2, por 14, 15; 9-1-17-por 4; 9-2-1-4, 5, 6, 7; 9-2-2-2
 APPLICANT: PBR Hawaii

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2008.

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

Attachments

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

Signed: *Paul Conry*
 Date: February 22, 2008

PAUL J. CONRY, ADMINISTRATOR
 DIVISION OF FORESTRY AND WILDLIFE
 FEB 26 2008



August 11, 2008

Mr. Morris M. Atta, Administrator
 State of Hawai'i
 Department of Land and Natural Resources
 Land Division
 P.O. Box 621
 Honolulu, Hawai'i 96809

SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Atta:

Thank you for your letter dated April 3, 2008. We have reviewed your letter and it is our understanding that the Draft EIS was distributed to the following divisions:

1. Division of Aquatic Resources (no comments provided);
2. Engineering Division (comments provided);
3. Division of Forestry and Wildlife (comments provided);
4. Commission on Water Resource Management (no comments provided);
5. Land Division - Oahu District (comments provided); and
6. Land Division - Keith Chun (comments provided).

After careful review of your letter, we offer the following responses to comments provided by the respective divisions of your department.

Engineering Division

1. We acknowledge that portions of the project site, according to the Flood Insurance Rate Map (FIRM), are located in Zones X, A and AE; and that while the National Flood Insurance Program does not have any regulations for developments within Zone X, it does regulate developments within Zone A and AE. Based on the DLNR Engineering Division's comments, the following paragraph will be added after Table 3.2 in the Final EIS:

W. FRANK BRANDLIASIA
 Chairman
 THOMAS WITTLIN, ASLA
 President
 R. STAN DUNCAN, ASLA
 Executive Vice-President

RUSSELL Y. CHENG, ASLA
 Executive Vice-President
 VINCENT SHIGEKUNI
 Vice-President
 GRANT L. MURAKAMI, ACP
 Principal

TOM SCHMIDT, ACP
 Senior Associate
 RAYMOND T. HIGA, ASLA
 Senior Associate

KEVIN K. ANSHUKAWA, ASLA
 Associate
 KIM M. HAHN, UYEN, LL.M., P.P.
 Associate
 SCOTT ALIKA AUBRIGO
 Associate

SCOTT MURAKAMI, ASLA
 Associate

HONOLULU OFFICE
 1091 Kalia Road, Suite 310
 ASB Tower, Suite 150
 Honolulu, Hawaii 96813-2841
 Tel: (808) 521-2501
 Fax: (808) 521-1802
 E-mail: spain@pbrhawaii.com

HIIA OFFICE
 1111 Apulani Street, Suite 310
 Hilo, Hawaii 96720-1528
 Tel: (808) 961-3233
 Fax: (808) 961-1959

WAILUKU OFFICE
 1737 Wahi Pt. Loop, Suite 4
 Wailuke, Hawaii 96791-1271
 Tel: (808) 542-2676

Division of Forestry and Wildlife wrote that it had no objections to the proposed project.

Land Division – Oahu District

1. We acknowledge that the Land Division – Oahu District has no comments to offer at this time.

Land Division – Keith Chun

1. The Petitioner acknowledges the development potential of the State-owned parcels adjacent to the Ho'opiili project. The Petitioner also acknowledges the regional infrastructure request and supports DLNR's being included in the planning and design of any regional infrastructure in the area that would serve the DLNR parcels. Based on DLNR Land Division's comments, the first and second paragraphs of Section 7.2, *Cumulative and Secondary Impacts* of Final EIS will be revised to read as follows:

This chapter identifies cumulative and secondary impacts that may result from the development of Ho'opiili and the East Kapolei region. During the public review period, the State Department of Land and Natural Resources (DLNR), Engineering Division wrote: "DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opiili project...The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (H-1 Freeway, Farrington Highway, North-South Road) and the City's proposed transit line as well as the substantial increase in development projects in the area. Consequently, regional infrastructure should take into consideration the potential development of the DLNR parcels, and DLNR requests that it be included in the planning and design of any regional infrastructure in the area that would serve the DLNR parcels."

7.2.1 Impacts on the Physical Environment

Climate, Topography, and Soils. Planned developments in the East Kapolei region (the proposed Ho'opiili project, University of Hawai'i at West O'ahu (UHWO), Department of Hawaiian Home Lands (DHHL) East Kapolei Development Parcels 1 and 2, Kroc Center, and the "DLNR parcels") are not expected to adversely impact regional climate, topography, and soils of existing developments, including, but not limited to, the communities of Waipahu, West Loch, Hanalei, Ewa Villages, Ewa Villages of Kapolei and Makaha. However, within their respective project sites, construction of the East Kapolei developments will impact mostly minor topographic features and soils, and new buildings may affect the respective micro-climate of each building site (by retaining and/or reflecting solar energy and heat, creating shade where none presently exists, or creating "wind tunnels"). Grading operations will comply with DOH regulations and are not expected to adversely impact air and water quality.

During the public review period, the State Department of Land and Natural Resources Engineering Division confirmed the flood zone designations affecting the Petition Area and wrote that: "The National Flood Insurance Program does not have any regulations for developments within Zone X, however, it does regulate developments within Zone A and AE...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...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 Sumitomo at (808) 768-8096 or Mr. Mario Sit Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting... While it is highly unlikely that any development will be proposed on lands designated Zone A or AE, the Petitioner will continue to coordinate with the Department of Planning and Permitting to discuss project-related issues, including the City's local flood ordinance."

2. As noted above, the project will 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. In addition, the Petitioner will continue to coordinate with the Department of Planning and Permitting to discuss project-related issues, including the City's local flood ordinance.

Division of Forestry and Wildlife

1. We acknowledge that the Division of Forestry and Wildlife has no objections to the proposed project. The fourth to the last paragraph in Section 3.7 *Flora, Anticipated Impacts and Mitigative Measures* of the Final EIS will be revised to read as follows:

None of the plant species which occurred on the Petition Area are considered to be a threatened and/or endangered species or a species of concern. During the public review period, the State Department of Land and Natural Resources, Division of Forestry and Wildlife wrote that it had no objections to the proposed project.

2. In addition, the fifth to the last paragraph in Section 3.8, *Fauna, Anticipated Impacts and Mitigative Measures* of the Final EIS will be revised to read as follows:

The majority of the sites surveyed within the Project Area are lands formerly cultivated in sugarcane or pineapple, having led to high degrees of disturbance or destruction of native habitat. Current habitats are deemed "depauperate" (severely diminished) by the biological consultant. Some of the sites are currently under partial cultivation, but those habitats likewise have been severely degraded. During the public review period, the State Department of Land and Natural Resources,

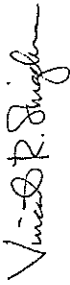
Mr. Morris M. Atta
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

0:\36252503.01 DR Helton-E Kapolei\EIS\Final EIS Response Letter\BL-12 DLNR Response.doc

LAURA E. THIELER
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 11, 2008

PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Attention: Mr. Vincent Shigekuni

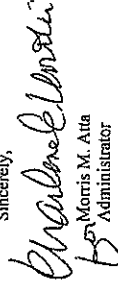
Gentlemen:

Subject: Draft Environmental Impact Statement for Ho'opili

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR), Land Division distributed or made available a copy of your report pertaining to the subject matter to the Commission on Water Resource Management for their review and comment.

The Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,


Morris M. Atta
Administrator

LAURA E. THIELER
GOVERNOR OF HAWAII
COMMISSION ON WATER RESOURCE MANAGEMENT

RECEIVED
APR 15 2008
PBR HAWAII

LINDA LINGLE
COMMISSIONER OF LAND



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
POST OFFICE BOX 521
HONOLULU, HAWAII 96809

LINDA LINGLE
COMMISSIONER OF LAND AND NATURAL RESOURCES



LINDA LINGLE
COMMISSIONER OF LAND



RECEIVED
LAND DIVISION

2008 APR -8 A 10:32
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
HONOLULU, HAWAII 96809

LINDA LINGLE
COMMISSIONER OF LAND AND NATURAL RESOURCES
HERBERT J. CHING
DEPUTY COMMISSIONER
KEVIN S. FURUKAWA
CHRYSTLE L. FURUKAWA, M.D.
DEPUTY COMMISSIONER
LAWRENCE H. WAIHE, M.D., D.P.H.
DEPUTY COMMISSIONER
KEH C. JAWAHARA, P.E.
DEPUTY COMMISSIONER

April 3, 2008

February 22, 2008

REF: HoopiIDEIS.doc

MEMORANDUM

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

TO: Morris Alla, Acting Administrator
Land Division
FROM: Ken C. Kawahara, P.E., Deputy Director
Commission on Water Resource Management
SUBJECT: Draft Environmental Impact Statement for Hoopiili
FILE NO.: N/A

Ken C. Kawahara

FROM: *M. Alla* Morris M. Alla
SUBJECT: Draft Environmental Impact Statement for Hoopiili
LOCATION: Ewa, Oahu, TMK: (1) 9-1-17:por 4, 59, 72; 9-1-18:1, 4; 9-1-10:2, por 14, 15; 9-1-17:por 4; 9-2-1, 4, 5, 6, 7; 9-2-2, 2
APPLICANT: PBR Hawaii

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore, all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the internet at <http://www.hawaii.gov/dlnr/cwrm>.

Our comments related to water resources are checked off below.

- 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- 2. 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.
- 3. There may be 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.

Permits required by CWRM: Additional information and forms are available at www.hawaii.gov/dlnr/cwrm/forms.htm.

- 4. The proposed water supply source for the project is located in a designated ground-water management area, and a Water Use Permit is required prior to use of ground water.
- 5. A Well Construction Permit(s) is (are) required before the commencement of any well construction work.
- 6. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by April 1, 2008.

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

Attachments

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

Signed: _____
Date: _____

- 7. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
 - 8. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
 - 9. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
 - 10. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
 - 11. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
 - 12. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
 - 13. We recommend that the report identify feasible alternative non-potable water resources, including reclaimed wastewater.
 - OTHER:
- The Commission on Water Resource Management (CWRM) would also like to ask that the reuse of storm water and the installation of water efficient fixtures be considered as a means to augment the development's proposed water usage. CWRM also recommends the use of xeriscaping and the planting of drought and salt-tolerant plants to conserve water supplies.

If there are any questions, please contact Jeremy Kimura at 587-0289.



August 11, 2008

WIRANS BRANDI LASHA
Chairman
 THOMAS WITLEN, ASLA
President
 K. STANDEN CAN, ASLA
Executive Vice-President
 RUSSELL CHUNG, PWSA
Executive Vice-President
 VINCENT SHERKENT
Vice-President
 GRANT L. MURAKAMI, AICP
Principal
 TOM SCHNILL, AICP
Senior Associate
 RAYMOND T. HIGA, ASLA
Senior Associate
 KEVINE NINIKAWA, ASLA
Associate
 KIMU MAMU YUN, LEID, AIP
Associate
 SCOTT AIKA AIBIGO
Associate
 SCOTT MURAKAMI, ASLA
Associate

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Atta:

Thank you for your letter dated April 11, 2008. We have reviewed your letter and offer the following responses to comments provided by the Commission on Water Resource Management:

1. As recommended, the Petitioner's civil engineering consultant, Bills Engineering, Inc., has been, and will continue to coordinate with the City and County of Honolulu Board of Water Supply (BWS) to integrate the project into BWS' water use and development plans. A water master plan was prepared for this purpose and was reproduced in its entirety in the Hoopili DEIS Volume II as Appendix M.
2. The State Department of Health (DOH) will be involved in reviewing the project with respect to water quality from the EIS process to actual construction plans. The project will comply with any resulting requirements related to water quality. Per your comments, we have consulted with Tom Nance Water Resource Engineering and we will revise the first paragraph of Section 3.5 *Groundwater Resources/Hydrology, Anticipated Impacts and Mitigation Measures* of Final EIS as follows:

The total average daily source requirement for ultimate build-out is estimated at 3.9 MGD. The present agricultural use of the Petition Area provides recharge to the alluvial portion of the caprock from excess applied irrigation water. This irrigation return eventually moves into the aquifer in the upper limestone layer of the caprock, becoming a portion of its recharge, albeit a relatively small portion. According to Tom Nance, Water Resource Engineering, development of the Ho'opili project will diminish this small component of the recharge to some extent, but will have an immeasurable impact on water level in the upper limestone layer.

HONOLULU OFFICE
 1021 Kalia Road, Suite 650
 ASB Tower, Suite 650
 Honolulu, Hawaii 96813-2481
 Tel: (808) 521-2641
 Fax: (808) 521-1402
 E-mail: operations@pbhawaii.com

HILO OFFICE
 101 August Street
 Hilo, Hawaii 96720-5010
 P.O. Box #196729-5010
 Hilo, HI 96729-5010
 Tel: (808) 961-3323
 Fax: (808) 961-4987

WAILUANI OFFICE
 1707 Wai Pu Lono, Suite 4
 Wailuku, Hawaii 96791-1271
 Tel: (808) 242-2675

The project is not expected to impact groundwater resources, as the caprock acts as a barrier to the drinking water in the Peititon Area. The caprock in 'Ewa, around Pearl Harbor, and in Honolulu, does function to retard seawater intrusion into the drinking water aquifer in the volcanics. According to Tom Nance, Water Resource Engineering, it is an incredibly important contribution to the availability of drinking water which comes about due to the mostly impermeable contact surface between the volcanics and the overlying caprock. It is not due to the water level in the caprock.

Both the drinking water aquifer in the volcanics and the brackish to saline aquifer in the caprock's upper limestone layer are in hydraulic contact with seawater nearshore and offshore. Sea level changes, whether weeks or months long due to large scale weather phenomena in the Pacific or a longer term sea level rise, does cause both aquifers to rise or fall accordingly. According to Tom Nance, Water Resource Engineering, the Ho'opili project will have no impact on sea level changes.

Although the Peititon Area is situated mauka of the UIC line, no injection wells or cesspools will be installed (since the project's wastewater collection system will eventually connect to the Honolulu Wastewater Treatment Facility), and any runoff or wastewater disposal for the project will be managed in full compliance with State Department of Health (DOH) regulations. Irrigation for landscaping will utilize brackish water from the 'Ewa caprock and/or treated effluent (R-1 quality) from the City and County of Honolulu's Honolulu Wastewater Treatment Facility (if available) to facilitate the recharge of caprock water and to reduce the demand for safe drinking water from the BWS system.

3. As noted on page xiv and Table 5.9 Required Permits/Approvals of the Draft EIS, a Water Use Permit is required for the project. An application will be submitted to CRWM prior to Building/Grading Permits. The only known source of ground water use will be associated with the development of a non-potable water system as generally described in the conceptual Water Master Plan (Appendix M of Hoopili DEIS Volume II).

4. We acknowledge that any wells that are not planned to be used and that will be affected by new construction will be properly abandoned and sealed. A permit for well abandonment will be applied for and processed.

5. As noted in Section 4.8.2 Water Supply Facilities, Anticipated Impacts and Mitigation Measures of the Final EIS:

With respect to non-potable water requirements, the project will be maximizing non-drinking usage to minimize the demand on the safe drinking water system. If a suitable supply is made available, Street right of ways of the Ho'opili project will have underground non-drinking distribution systems. It is proposed to upgrade the existing non-drinking source (EP 5 & 6 located within Parcel C) to a BWS dedicable standard to be used as the source for the non-drinking system. It is also proposed to ultimately allow for future dedication of the non-drinking system. It is estimated that the ultimate non-drinking demand for the project will be approximately 2.1 MGD.

The Petitioner will consider the use of drought tolerant/low water use plants and the implementation of xeriscaping principles for landscaping within the Ho'opili project to the extent practicable. The installation of an efficient irrigation system, possibly using drip irrigation, will be considered in the design of the project where feasible. Moisture sensors to avoid the operation of the system in the rain and if the ground has adequate moisture would be incorporated into the irrigation system, where feasible.

Another source of non-potable water is reclaimed water. The Honolulu Board of Water Supply (BWS) entered into the water recycling business in 2000 by purchasing the Honolulu Water Reclamation Facility. Water recycling of treated wastewater effluent is one element of a broader BWS strategy to protect O'ahu's aquifers and to conserve water resources through conservation and development of new water supplies. Treated effluent from the facility is now irrigating golf courses that were once using brackish water, including West Loch, 'Ewa Villages, Hawai'i Prince, and Coral Creek. The facility is also providing recycled water (at a different level of treatment) to industries at Campbell Industrial Park.

6. The Petitioner will consider the reuse of storm water and the installation of water efficient fixtures, and is considering the use of xeriscaping and the planting of drought tolerant and salt-tolerant plants to conserve water supplies, where applicable.

The last paragraph of Section 4.8.2 Water Supply Facilities, Anticipated Impacts and Mitigation Measures of the Final EIS will be revised as follows:

The project will be maximizing the use of non-potable water for irrigation to minimize the impact on the source component of the BWS system. It is proposed that the project's greenbelts, parks and roadway medians use non-potable water for irrigation, if a suitable supply will be available. The BWS Water Resources Division will be contacted regarding the availability of recycled water and other non-potable water supplies. A Conceptual Water Master Plan addressing safe drinking and non-potable water facilities has been prepared and reproduced in its entirety and attached to this EIS as Appendix M will be submitted to BWS for its review and approval. In addition, construction drawings will be submitted to BWS for its review and approval. During the public review period of the Draft EIS, the DLNR Commission on Water Resource Management requested that "the reuse of storm water and installation of water efficient fixtures be considered" and recommended "the use of xeriscaping and the planting of drought tolerant and salt-tolerant plants to conserve water supplies."

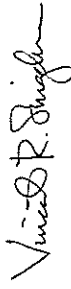
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

Mr. Morris M. Atta
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\vol252503.01 DIR Horton-E Kapolei\EIS\Final EIS\Final EIS Response Letters\BL-27 DLNR CWRM Response.doc

LINDA LINGLE
GOVERNOR



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

April 7, 2008

Mr. Vincent Shigekuni
Vice President
PBR Hawaii & Associates, Inc.
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Ho'opili
D.R. Horton – Schuler Homes, LLC
Draft Environmental Impact Statement (Draft EIS)
Petition Area: TMK: 9-1-17: 04 (portion), 59, and 72; 9-1-18: 01 and 04.
Remainder of the Project Area: TMK: 9-1-10: 02, 14 (portion), and
15 (portion); 9-1-17: 04 (portion); 9-2-01: 04, 05, 06 and 07; and 9-2-02: 02

The Department of Transportation (DOT) submits the following comments on the subject project as presented in the Draft EIS:

1. The DOT's prior comments related to the project's EIS Preparation Notice in letter STP 8.2450 dated April 9, 2007 and your response in letter February 8, 2008 (copies attached) on the project's transportation impacts are still valid and applicable to the subject Draft EIS. To summarize:
 - a. Occasional aircraft overflights and aircraft single-event noise may occur. Prospective occupants should be made aware of the potential for such occurrences.
 - b. The project's location next to the State highways, proposed direct accesses and connections to a State highway, and contribution of additional traffic in the area and onto the highways require project and regional traffic mitigation measures and road/highway improvements.
 - c. Drainage systems, other project construction plans and work affecting the highway right-of-ways require prior DOT review and approval.

BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORBAY
FRANCIS PAUL KESHO
BRUNNEN GENDRON
IN REPLY REFER TO:

STP 8.2831

LINDA LINGLE
GOVERNOR



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

BARRY FUKUNAGA
INTERIM DIRECTOR

Deputy Directors
FRANCIS PAUL KEENO
BRENNON T. MORIOKA
BRANDY H. SEBOUGH

REPLY REFER TO:
STP 8.2450

STP 8.2831

Mr. Vincent Shigekuni
Page 2
April 7, 2008

- The subject project is one of several major land developments scheduled to occur in the Kapelei-Ewa region, including projects in Makakilo and Kunia, around the same 2010-2030 time period. The subject project itself will create significant transportation impacts and further contribute to collective regional impacts, which will produce even greater cumulative impacts. Both these impacts, as well as the influence of the Honolulu High-Capacity Transit project, must be addressed.

The project is obligated under the applicable City & County of Honolulu ordinance to participate in and contribute to the Ewa Impact Fee for transportation improvements.

The project is also obligated to provide for and/or implement the traffic mitigation measures and road/highway improvements determined necessary by the DOT Highways Division. The Highways Division is in the process of concluding its review of the development plan and TIAR for the subject project. When the analysis is completed, the Highways Division will contact your firm.

Due to the significant impacts associated with the subject project, the DOT feels that further analysis and evaluation of the transportation factors is necessary. Thank you for the time and opportunity afforded to review the project plans and TIAR. Your continued cooperation is appreciated.

Very truly yours,

BRENNON T. MORIOKA, PH.D., P.E.
Director of Transportation

Attach.

c: Rodney Maile, Land Use Commission
Mary Lou Kobayashi, Office of Planning, DBEDT

April 9, 2007

Mr. Vincent Shigekuni
PBR Hawaii & Associates, Inc.
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Ho'opili
D. R. Horton - Schuler, LLC
EIS Preparation Notice for LUC Petition No. A06-771 Filing
TMK: 9-1-17: 04 (portion), 59, and 72; 9-1-18: 01 and 04;
9-1-10: 02, 14 (portion), and 15 (portion) and 9-2-02: 02, and
(portion), 04, 05, 06 and 07

Thank you for providing the notification on the subject proposed land development project. We have the following initial comments as an interested party:

- The site of the project is not directly under aircraft flight paths for Kalaheoa Airport or Honolulu International Airport. However, the developer and prospective residents/occupants should be advised and made aware that single-event noise may occur from potential overflights of aircraft or under certain weather/atmospheric conditions, particularly from aircraft approaching or departing Kalaheoa Airport.
- The development of the project will have a significant traffic impact on our highway facilities in the Kapelei-Ewa region. The developer should prepare and submit a traffic impact analysis report (TIAR). The TIAR should cover both project traffic impacts and the cumulative traffic impacts to the community and region, which the project will be contributing to, including the existing and future road network in the area. Accesses and connections to any State highway also need to be identified. The TIAR should provide recommended and required transportation mitigation measures and roadway improvements to address the impacts, including the developer's participation in and contribution to provide the mitigation measures and improvements. We will need to review and approve the TIAR.



Mr. Vincent Shigekuni
 Page 2
 April 9, 2007

STP 8.2450

August 11, 2008

W. FRANK BRANDE, ASIA
 Chairman

THOMAS W. WYLLIE, ASIA
 President

R. STAN BENCAN, ASIA
 Executive Vice-President

RUSSELL CHING, ASIA
 Executive Vice-President

VINCENT SHIGEKUNI
 Mr. President

GRANT SUWAKAM, AKCP
 Principal

TOM KINHELLA, AICP
 Senior Associate

RAYMOND T. HIGA, ASHA
 Senior Associate

KEVIN K. NISHIKAWA, ASHA
 Associate

KIMIYUKI YUNO, LEED AP
 Associate

SCOTT AUKA AMRIGO
 Associate

SCOTT MURAKAMI, ASLA
 Associate

HONOLULU OFFICE
 1001 Iukou Street
 ASB Tower, Suite 620
 Honolulu, Hawaii 96813-2884
 Tel: (808) 521-5631
 Fax: (808) 523-1183
 E-mail: sp@pbrhawaii.com

HILLO OFFICE
 101 August Street
 Hilo, Hawaii 96720-4242
 Tel: (808) 961-3223
 Fax: (808) 961-1689

WAILUKU OFFICE
 1787 Wai Pa Loop, Suite 4
 Wailuku, Hawaii 96791-1271
 Tel: (808) 242-2628

3. We should be included in agency reviews and approvals of the drainage plans for the subject project.
4. Any construction work by or for the subject project that can affect a State highway and/or can occur within or adjoin a State highway right-of-way will need our prior review and approval.

We will defer any other additional comments on the subject project until we receive and have the opportunity to review more information on the project. We would appreciate receiving at least five (5) copies of any report or document on the project for review by our operating divisions.

We appreciate the opportunity to provide our comments.

Very truly yours,


 BARRY FUKUNAGA
 Interim Director of Transportation

D/S:km

- c. Genevieve Salmonson, Office of Environmental Quality Control
 Laura Thieleen, Office of Planning, DBEDT
 Anthony Ching, Land Use Commission

Mr. Breannon Morioka, Director
 State of Hawai'i
 Department of Transportation
 869 Punchbowl Street
 Honolulu, Hawai'i 96813-5097

SUBJECT: HO'OPELI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Morioka:

Thank you for your letter dated April 7, 2008 (your reference: STP 8.2831). We have reviewed your letter and offer the following responses to your comments:

1. We acknowledge that the Department of Transportation's prior comments related to the project's EIS Preparation Notice in letter STP 8.2450 dated April 9, 2007 and our response in a letter dated February 8, 2008 on the project's transportation impacts are still valid and applicable to the DEIS. Specifically:
 - a. We acknowledge that single-event noise may occur from potential overflights of aircraft or under certain weather/atmospheric conditions, particularly from aircraft approaching or departing Kalaeloa Airport. Prospective occupants will be made aware of the potential for such occurrences. The third to the last paragraph of Section 4.3 Noise, *Anticipated Impacts and Mitigation Measures* of the EIS will be revised as follows:

Aircraft noise due to operations at nearby Kalaeloa Airport and the Honolulu International Airport may be audible at the project site. However, flights directly above the site are infrequent and the project site is outside of the Ldn 55 noise contour for both airports. Therefore, a significant noise impact due to aircraft noise is not expected. However, per the comments made by the State Department of Transportation during the Draft EIS public review period, prospective occupants will be made aware of the potential for such occurrences.

- b. Proposed traffic mitigation measures were identified on pages 79 through 84 of the DEIS.
- c. We acknowledge that drainage systems, other project construction plans and work affecting the highway right-of-ways require prior DOT review and approval. The second paragraph in Section 2.6 *Infrastructure Improvements* of the EIS will be revised as follows:

Drainage systems, other project construction plans and work affecting the highway right-of-ways require prior DOT review and approval. The second paragraph in Section 2.6 Infrastructure Improvements of the EIS will be revised as follows:

Mr. Brennon Morioka
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Major on-site infrastructure improvements required for the project include: facilities for water transmission and distribution; wastewater collection; traffic circulation; drainage; and electrical and communication systems. It is possible that one or more micro-utility companies may be providing a portion or all of the electrical and/or communication systems for the project. For instance, there are companies that can install solar photovoltaic panels on buildings for free in return for charging lower electrical rates than HECO. While the specific nature of each improvement is not known at this time, the EIS is intended to address all current and future instances involving the use of State and/or County lands and funds relating to the Ho'opili project, including micro-utility companies that may require the use over State and/or County lands to operate and maintain any utility lines or facilities. For comments made by the State Department of Transportation during the Draft EIS public review period, drainage systems, other project construction plans and work affecting the highway right-of-ways require prior DOT review and approval.

2. We acknowledge your concern that the project will create significant transportation impacts and further contribute to collective regional impacts, which will produce even greater cumulative impacts. The cumulative impacts of the project and other projects in the area were addressed in the Traffic Impact Analysis Report prepared by Wilbur Smith & Associates (February 2008), which was reproduced in its entirety in the DEIS as Appendix L and summarized in Section 4.8.1 Transportation of the DEIS.

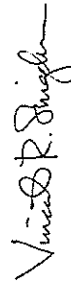
We acknowledge that the project is obligated under the applicable City & County of Honolulu ordinance to participate in and contribute to the Ewa Impact Fee for transportation improvements. This was noted in the third to the last paragraph of Section 4.8.1 Transportation, Anticipated Impacts and Mitigation Measures of the DEIS.

Furthermore, we acknowledge that the project is also obligated to provide for and/or implement the traffic mitigation measures and road/highway improvements determined necessary by the DOT Highways Division. We acknowledge that the Highways Division is in the process of concluding its review of the development plan and TIAR for the subject project. As such, the Petitioner will continue to coordinate with the DOT Highways Division during the design of the project.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\No16252503\01 DR_Heron-E Kapolei\EIS\Final EIS/Response Letters\BL-19 DOT-Response.doc



HAWAIIAN
DEPARTMENT OF
LAND AND
NATURAL RESOURCES



KALAELOA

Linda Lingle
Governor

Jonathan W. Y. Lai
Chairperson

Anthony J. H. Ching
Executive Director

677 Ala Moana Boulevard
Suite 1001
Honolulu, Hawaii
96813

Telephone
(808) 587-2870
Facsimile
(808) 587-8150

E-Mail
contact@hcdaweb.org
Web site
www.hcdaweb.org

Ref. No.: PL Kalaeloa 17.1.1

April 7, 2008

Mr. Vincent Shigekuni
PBR Hawaii & Associates Inc.
1001 Bishop Street
ASB Tower 650
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

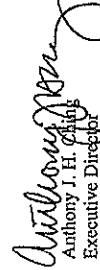
SUBJECT: Draft Environmental Impact Statement for the Ho'opili
Project Ewa, O'ahu, Hawaii

Thank you for the opportunity to review and comment on the Ho'opili Project Draft Environmental Impact Statement (DEIS). In 2002, the State Legislature transferred the responsibility for the planning and redevelopment of the Kalaeloa Community Development District (KCDD) to the Hawaii Community Development Authority (HCDA). Given the scope and impact of the Ho'opili project upon the Kapolei Ewa region it is my hope that the live, work and play objectives of the Kalaeloa Master Plan will be coordinated with your project.

The HCDA supports the development of an internal network of closely-spaced gridded streets and bike paths linking the project to the surrounding communities of University of Hawaii West Oahu (UHWO), Department of Hawaiian Homes Land (DHHL), Ewa Villages, and the KCDD. This objective is consistent with the HCDA Kalaeloa Master Plan. Improving connectivity throughout the region was one of the most important issues identified during the strategic planning meetings for the region as well as the KCDD. The extension of the Kapolei Area Bikeway Plan to include UHWO, DHHL, and the KCDD in the DEIS is also noteworthy and consistent with our Master Plan.

Thank you for the opportunity to comment on the DEIS. Should you require clarification, please contact Tesha Malama via email at tesha@hcdaweb.org or at 520-2686.

Sincerely,



Anthony J. H. Ching
Executive Director

AJHC/TM:js
cc: State of Hawaii Land Use Commission



Mr. Anthony J.H. Ching
 SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
 August 11, 2008
 Page 2

August 11, 2008

W. WANKIRANDEUSALA
 Chairman

T. DIMASS WITTEN, AIA
 President

R. STAN BUNGAN, AIA
 Executive Vice-President

RUSSELL J. CHUNG, FASIA
 Executive Vice-President

VINCENT SHIGEKUNI
 Vice-President

GRANT MURAKAMI, AUP
 Principal

TOM SCHILL, AICP
 Senior Associate

RAYMOND T. JIGA, AIA
 Senior Associate

KEVIN K. NISHIKAWA, AIA
 Associate

KIMI MIKAMI YUESUJIDIP, AP
 Associate

SCOTT ADAMA ABRIGO
 Associate

SCOTT MURAKAMI, AIA
 Associate

HONOLULU OFFICE
 1000 Ala Moana Blvd., Suite 600
 ASB Tower, Suite 600
 Honolulu, Hawaii 96813-4391
 Tel: (808) 751-5031
 Fax: (808) 520-1802
 E-mail: pbrhawaii@pbrhawaii.com

HILO OFFICE
 1111 Kapaemahu Dr., Suite 310
 Hilo, Hawaii 96720-4263
 Tel: (808) 961-3333
 Fax: (808) 961-1999

WAILUKU OFFICE
 1755 Wahi Dr Loop, Suite 1
 Wailuku, Hawaii 96775-1271
 Tel: (808) 242-2576

Mr. Anthony J.H. Ching, Executive Director
 State of Hawai'i
 Hawai'i Community Development Authority
 677 Ala Moana Boulevard, Suite 1001
 Honolulu, Hawai'i 96813

Attn: Ms. Tesha Malama

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Ching:

Thank you for your letter dated April 7, 2008 (your reference number: PL Kahaaloa 17.1.1). We greatly appreciate your letter and your agency's participation in our meetings with the University of Hawai'i at West Oahu, the Department of Hawaiian Home Lands, the Kroc Center and others. The fourth paragraph of the Executive Summary of the EIS will be revised to read as follows:

Ho'opili is planned to be connected to the surrounding 'Ewa District (and neighboring DHHL, UHWO and HCDA properties) by a network of streets and bicycle paths which should allow a variety of circulation options for residents and visitors. During the public review period, the Hawai'i Community Development Authority (HCDA) wrote that: "The HCDA supports the development of an internal network of closely-spaced gridded streets and bike paths linking the project to the surrounding communities of University of Hawai'i West Oahu (UHWO), Department of Hawaiian Home Lands (DHHL), Ewa Villages, and the KCDD. This objective is consistent with the HCDA Kahaaloa Master Plan. Improving connectivity throughout the region was one of the most important issues identified during the strategic planning meetings for the region as well as the KCDD. The extension of the Kapolei Area Bikerway Plan to include UHWO, DHHL, and the KCDD in the DEIS is also noteworthy and consistent with our Master Plan."

Wider tree-lined boulevards are intended to create a distinct axis running north-south and east-west across the site. Ho'opili is being designed to be transit-ready, and the land use plan, while subject to change, has been designed to accommodate a high-capacity transit corridor either along Farrington Highway or diagonally through the project site, with either one or two transit station locations. Also possible is a transit maintenance and storage facility. While the proposed residential unit count should not materially change, it will need to be adjusted depending on the final alignment of the high-capacity transit corridor, as ridership generation, "capture" of transit-oriented development potential and the potential for noise impact from an elevated high-capacity transit alignment would likely require taller, higher density residential or industrial uses along the alignment. The final siting of the transit station location(s) will concentrate higher intensity development (and density) around the transit station(s). A site for a transit maintenance and storage facility is also possible. (As of this writing, the City and County of Honolulu (City) has begun work on the Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor (HHCTC) project, with a target publication date in the second quarter of 2008. By the time the HHCTC Draft EIS is published, the final alignment of the high-capacity transit corridor, the location of transit stations, and the location of the transit maintenance and storage facility will be known.)

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
 Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
 Mr. Dan Davidson, State Land Use Commission

O:\Vol2\2503\01 DR Horton-B Kapele\EIS\Final EIS\Final EIS Response Letters\RL-14 HCDA Response.doc



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPOLANI BOULEVARD, SUITE 600
HONOLULU, HAWAII 96813

HRD08/2945B

April 17, 2008

Vincent Shigekuni, Vice President
PBR Hawaii & Associates, Inc.
1001 Bishop Street,
ABS Tower, Suite 650
Honolulu, Hawaii 96813-3484

RE: Ho'opili Draft Environmental Impact Statement (DEIS) and Reclassification
of Land from Agricultural to Urban, 'Ewa District, O'ahu, EMKs: 9-1-17:04,
59, and 72; 9-1-18:01 and 04; 9-1-10: 02, 14 and 15; 9-1-17:04; 9-2-01:04, 05,
06 and 07; and 9-2-02:02.

Dear Mr. Shigekuni,

The Office of Hawaiian Affairs (OHA) is in receipt of the above referenced request for
comments concerning a DEIS for the proposed Ho'opili development and reclassification
of 1,553,844 acres of land from agricultural to urban in the 'Ewa District on O'ahu. We
offer the following comments:

OHA understands, and as the applicant has pointed out, that the City and County of
Honolulu is in a housing crisis and our collective population is expected to grow in the
foreseeable future.¹ We also understand that the amount of available land for our homes
is scarce. Naturally, this puts us all in a bind. However, OHA fundamentally cannot
support a project that proposes to remove the best and most highly-protected agricultural
lands on this island from current and active production. OHA notes that these lands have
been described as the "golden triangle" on O'ahu, and that they have historically been
some of the most productive and consistent agricultural lands in our State.²

¹ See page 12 of the DEIS.

² See,

<http://www.honolulu.gov/veriser.com/apps/pbcs.dll/article?AID=20080331/NEWS01/8033103030/0/NEWS0>

L. posted on March 31, 2008.

Vincent Shigekuni, Vice President
PBR Hawaii & Associates, Inc.
April 17, 2008
Page 2

OHA stresses that this land is zoned Agriculture A-1 which requires that the greatest
possible protection be given to these lands. (see Hawaii Revised Statutes Section 205)
OHA is deeply concerned that this area be used for agricultural uses only. Our concerns
are echoed by the myriad of laws and legislation supporting a strong agricultural
economic base and retention of those lands primarily in agricultural pursuits in the
specific project area. (see Hawaii Revised Statutes, Section 205, O'ahu General Plan and
Sustainable Communities Plan; Section 1-11.5 of the City Subdivision Rules and
Regulations; the State Coastal Zone Management Act; and even the city's 'Ewa
Development Plan, last updated in 2000, which emphasizes that high-value farmland be
preserved for agriculture for 3,000 acres in the general project area.) OHA stresses that
only accessory agribusiness activities which meet the above intent are to be permitted in
this area.

Hawaii Revised Statutes section 205-2 states that, "In the establishment of agricultural
districts the greatest possible protection shall be given to those lands with a high capacity
for intensive cultivation". That is exactly the kind of land that this project proposes to
use and as such, OHA cannot reasonably see how the removal of 1,553,844 acres of
prime agricultural lands currently in use does not run afoul of state and county land use
plans, controls and policies.

Further, Hawaii Revised Statutes section 205-41 states;

It is declared that the people of Hawaii have a substantial interest in the
health and sustainability of agriculture as an industry in the State. There is
a compelling state interest in conserving the State's agricultural land
resource base and assuring the long-term availability of agricultural lands
for agricultural use to achieve the purposes of:

- (1) Conserving and protecting agricultural lands;
- (2) Promoting diversified agriculture;
- (3) Increasing agricultural self-sufficiency; and
- (4) Assuring the availability of agriculturally suitable lands pursuant to
article XI, section 3, of the Hawaii state constitution.

In 1961, the Committee on Lands and Natural Resources remarked that its goal in
creating the State Land Use Commission was primarily to "protect productive

agricultural lands...through state zoning."³ The high value assigned to agriculture lands was emphasized again by the 1976 legislature when they assigned Class A and B agricultural lands "additional protection...[against county approval of] agricultural subdivisions."⁴

Further, and as mentioned in Hawaii Revised Statutes section 205-4.1, even our state constitution emphasizes that:

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

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

Additionally, and as the applicant knows, most of the soils in the project area are rated A or B. This is significant because A and B soil classified agriculture lands have additional layers of protection given to them in Hawaii Revised Statutes section 205-4.5 (16)(b) which does not allow a county to approve a subdivision of these lands unless subdivision is made subject to restrictions that keep them in agricultural use.

OHA realizes that housing is an important issue for our beneficiaries and a difficult one for this State. This is why we seek to improve upon environmental review documents such as these so that public input can be considered; impacts mitigated and proposed projects become the best that they can be. This is also why we urge the applicant to provide us with additional alternatives analysis. The heart of an environmental review document is its discussion of alternatives. OHA seeks to find a rigorous and objective analysis of all reasonable alternatives to the proposed action, including a discussion of the "no action" alternative as a base-point to which the proposed action can be compared. This was not done in this case. The Alternatives Analysis section of the Executive Summary is nine lines long and the Alternatives to the Proposed Action section (6.0) of

³ S. Stand. Comm. Rep. 850, 1st Leg., Gen. Sess. (1961), reprinted in 1961 Haw. Sen. J. 883, 883. From Avoiding the Next Hokuili'a, Adrienne Suarez, 27 UH L. Rev. 441.

⁴ S. Conf. Comm. Rep. 2-76, 8th Leg., Reg. Sess. (1976), reprinted in 1976 Haw. Sen. J. 836, 836. From Avoiding the Next Hokuili'a, Adrienne Suarez, 27 UH L. Rev. 441.

the DEIS is but four pages long. A proposed action of this magnitude dealing with an issue of this importance requires more attention than:

Further study or delay of any proposed development on the property would not be consistent with the *Ewa Development Plan* or the County's objective of directing growth to 'Ewa. Therefore, various alternatives for the site were rejected...."

OHA notes that being in a hurry or citing previous studies is not reason to skirt an alternatives analysis. Neither is an arrangement of consistent goals, as there are just as many land use policies and goals (if not more) that the applicant proposes to violate. OHA understands that this issue is a difficult one; however, as this is the applicant's proposed project we ask them to provide valid alternatives analysis for review and public comment in order to make this a better project and avoid further unnecessary costs.

In terms of housing, OHA additionally notes that according to the Center on Budget and Policy Priorities webpage, (<http://www.cbpp.org/4-17-06sfp.htm>); as of April 2006, the poverty level for a two-parent family of four in Hawaii is \$19,961. As such, we ask how many of the applicant's proposed homes will be made to be affordable and to what standard is affordable defined.

Regarding drainage, OHA notes that Kalo'i Gulch is proposed to be shared by all of the current users and the University of Hawai'i at West O'ahu, the Department of Hawaiian Homelands, the Kroc Center, Haseko's Ocean Pointe development as well as the applicant. Therefore, we will hold the applicant to their statement made on page 223 of the DEIS that discharge flow rates will not exceed pre-development conditions and that the rules relating to water quality standards will be adhered to. However, we do seek clarification on this point because page x of the DEIS states, "Over time the project will result in an increase in wastewater being generated that currently being generated on-site (by agricultural activities)."⁵ OHA is also confused as to whether discharge rates will not exceed pre-development conditions because of the statement on page xi: "The project will increase impervious surfaces such as roadways, roof, paved parking areas, and sidewalks. These surfaces will cause an increase in storm water discharge within the Petition Area."⁶

⁵ Page 91 of the DEIS also makes a similar statement.

⁶ Page 223 of the DEIS also makes a similar claim. OHA does note page 118 of the DEIS states that the Kalo'i basin will not exceed pre-development conditions while the Honolulu basin will discharge at rates not exceeding the 10-year occurrence flow rate (for which OHA would request analysis for impacts to the nearshore environment) and that the West Loch basin has no drainage rate.

OHA wishes to point out that there are a host of State water quality standards that must be met by this project.⁷ For example, all Hawaii state waters are classified as Class A or Class AA. Class A waters have strict pollution discharge regulations to protect them for recreational and aesthetic enjoyment. This includes the Clean Water Branch requirements that any project and its potential impacts to State waters meet the following criteria:

-Anti-degradation policy (Hawaii Administrative Rules (HAR), Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.

-Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.

-Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

OHA further notes that the Kalo'i Gulch drainage way (as do the Honouliuli and West Loch drainage basins which are potentially to be used for this project) eventually discharges into the ocean. As such, OHA inquires as to the monitoring plan proposed by the applicant to ensure that the Rules Relating to Storm Drainage Standards and discharges into State waters are being complied with.

OHA also sees that the DEIS on page 33 states, "Proposed drainage improvements within the Petition Area include on-site detention and retention basins, which will promote on-site infiltration of surface water and facilitate groundwater recharge." OHA points out that this is in contradiction to the statement made on the previous page of the DEIS (page 32) which indicates that surface water is not tied to groundwater: "Within the Petition Area, surface water in the channel (Honouliuli) does not appear to be connected to the groundwater."

OHA urges the applicant to be aware of the potential for water in the detention and retention ponds to seep into the groundwater system. As such, we ask if an overflow pipe will be included in these ponds and what are the impacts from the expected overflow. Further, we ask that the applicant provide analysis as to the effects of the increased discharges from their proposed use of the Petition Area drainage basins on the nearshore environment. In particular we are concerned about the effects from this project on fishing grounds, firm and fishponds, all of which are found in the area and all of which

⁷ This is because the proposed project is seen as exempt due to its not being significantly different from the original fill design. See 33 Code of Federal Regulations 323.4(a)(2).

are being currently used by our beneficiaries for their constitutionally protected cultural practices. We note that the Cultural Impact Assessment states on page 98 that there are such practices in the Project Area but that:

The Project Area is approximately 600m (2,000 feet) back from the coast therefore marine resources will not be affected.

OHA disagrees with this statement and seeks clarification as to what the basis was for this particular determination. Analysis for this type of conclusion in an environmental review document should be accompanied by such things as instream flow rates, biological assessments and brackish water content for the area. This is particularly important because we see that our beneficiaries' interests will be negatively impacted by this action in this regard.

Also, regarding the makai detention basin, OHA notes that permission of the Navy would be required for this basin to be built and not only has the Navy not given its permission, they have refused and, despite what may have been in the past, there is no indication that OHA is aware of that they may acquiesce to the applicant's request. Naturally, this raises a host of concerns for all involved, no doubt mostly to the applicant.⁸ However, OHA does wish to see analysis provided in an environmental review for all aspects of a proposed project that are truly feasible at the time of writing the document. Future possibilities and conditionals cannot provide the basis for substantive review and meaningful public input.

To help mitigate the adverse impacts of a proposed project and make it the best it can be OHA urges that the applicant provide information and analysis for parts of the project that are likely to come to fruition.⁹ We point this out because we also see that this project hinges upon not only Navy permission that is not forthcoming, but also a proposed building out of a wastewater treatment plant and associated improvements¹⁰ the "assumption"¹¹ for a proposed transportation system servicing the area, and recycling programs that do not exist yet.

Regarding stormwater in general, OHA wishes to see stormwater as a resource to be captured and conserved rather than a nuisance to be channeled and drained away. As stormwater travels down a drainage system, it accumulates industrial waste, pesticides,

⁸ OHA notes that if Navy land is used, a Section 106 of the National Historic Preservation Act consultation and other federal assessments may be triggered.

⁹ DEIS, page 91.

¹⁰ DEIS, page 31.

¹¹ "The Ho'opi'i project has been planned assuming that certain planned transportation projects will be constructed..." DEIS, page ix.

soak up pollutants. Trees, shrubs, and groundcover absorb up to fourteen times more rainwater than a grass lawn and they don't require fertilizer.¹³

OHA also suggests that any drainage channels be altered from their smooth bottoms with the addition of berms, blocks, or recessed 'checkerboards' to further reduce the introduction of sediments and turbidity into the nearshore environment.

OHA appreciates the applicant's intent to reduce inflow and infiltration via manholes, which should result in increased capacity in the existing system and hopefully reduce peak flows, thereby mitigating the need for wet-weather storage facilities.

As you know, inflow of storm runoff through manhole covers, particularly in areas that are inundated due to poor drainage, can be significant. In addition to the applicant's already mentioned procedures for manholes, OHA also suggests that the applicant consider that substantial inflow could potentially enter manholes below the frame due to misalignment, damaged mortar or cone, or other problems. In some cases, rain induced infiltration may also enter through the manhole cone if the surrounding material is highly permeable and the cone exhibits porous brick mortar joints.

Section 1-4.2 (4) (a)(3) of the *Rules Relating to Storm Drainage Standards* states that the bottoms of manholes shall be shaped to channelize flow and sloped with the slope of the pipe.¹⁴ OHA asks if the Stormceptor type storm drain manholes will accomplish these goals.

OHA was surprised that this DEIS did not contain information regarding Best Management Practices (BMPs). The cost of improperly maintained BMPs can be devastating to a business and community. Improperly maintained BMPs not only decrease in efficiency of removing pollutants, they also create environmental hazards (such as flooding and contamination), placing an owner or property manager at risk for liability.

Structural best management practices seem to be most effective when they can be combined in a treatment train. "Treatment train" refers to the application of a series of physical stormwater best management practices to achieve improved drainage water quality. However, BMPs will fail if improperly located within the treatment train or not properly maintained.

¹³ See Maryland's Stormwater Management Program at: <http://www.mde.state.md.us/Programs/WaterPrograms/SedimentandStormwater/index.asp>
¹⁴ See <http://www.cleanwaterjournal.com/storm/notice/s/wmp/age-2.pdf>.

oils, and chemicals. These pollutants quickly settle into the nearshore sediments and are re-suspended into the water column when disturbed.

Persistent organic pollutants (POPs) are organic compounds that linger in the environment, travel through the food web, and pose risks to human health and the environment. Organic hydrocarbons, including petroleum products, are examples of POPs. POPs are most commonly introduced to marine systems via discharged sewage and stormwater effluent, terrestrial runoff, and oil spills. POPs can also bioaccumulate in the nearshore species that inhabit these areas.

Therefore, OHA recommends the use of a stormwater management system that would filter these and other pollutants out and slow the amount of sediments entering our waters. The following four water management methods and erosion control structures are used by the Food and Agriculture Organization of the United Nations¹²:

- runoff harvesting (catching runoff for supplementary irrigation);
- total absorption or infiltration;
- runoff diversion (redirecting excess water);
- runoff spreading (distribution of runoff energy).

OHA is pleased to see that the applicant is proposing to use retention and detention ponds where possible. OHA does remark that if ponds are used, they should be shallow with slow sloping bottoms. The slow sloping sides are needed for safety if people happen to fall in. A surrounding area around the pond should be provided for water storage when heavy rains are present. OHA does ask if retention and detention ponds will be installed near each other in a row so that the water will get held up in the detention pond and slowly drain into the retention pond. The detention pond will help eliminate flooding and the retention will hold the remaining water. The use of permeable paving materials can also retain some of the rain that falls and catch basins can capture and help to slow the runoff thereby reducing turbidity and sediment runoff.

Retention and detention ponds also serve to remove pollutants, such as POPs and trash. Since retention and detention ponds are the drainage basin for an area, pollutants, trash and debris are washed into these areas often after heavy rains or wind rather than entering the nearshore environment. Retention and detention ponds can help to capture many types of pollutants. Also, OHA recommends allowing native and drought resistant "thick" vegetation or "buffer strips" to grow where possible to filter and slow runoff and

¹² See <http://www.fao.org/docrep/T1765P/t1765e0a.htm>.

Once implemented, however, BMPs require monitoring to ensure that they are achieving the objectives for which they were selected. BMP monitoring also involves scheduling of inspections to ensure that the outcomes of BMPs meet expectations. At the heart of BMP effectiveness monitoring is a listing of each BMP, its expected performance and an assessment of whether the controlled value (noise, dust, water quality, etc.) is within targeted limits.

OHA, therefore, inquires as to the applicant's BMP plan (including monitoring and effectiveness) which should be prepared and implemented to minimize the impacts on water quality. Long term operational impacts such as increased pollutant loads in storm discharges should similarly be included in the plan and treated to the best degree possible prior to discharge in order to conform with Hawai'i Administrative Rules §11-54-03(c)(2)(A)(i) and (iii).

Regarding soil erosion, the erosion control standards and guidelines state that large projects like this one (Categories 4 and 5) must utilize the Universal Soil Loss Equation to evaluate and compare existing conditions with relative soil loss rates caused by construction and post-construction activities not exceeding the maximum allowable soil loss rates for Oahu. (see www.cleanwater.honolulu.gov/storm/notifications/swmp/app-c2.pdf and also Rules Relating to Storm Drainage Standards at www.cleanwater.honolulu.gov/storm/notifications/swmp/app-c1.pdf) OHA inquires as to the nature of the soil erosion rates and subsequent discharge that the applicant calculates will occur as a result of this proposed project.

To mitigate these negative effects, OHA recommends cleaning job-site construction equipment and establishing groundcover as quickly as possible after grading with native or endemic drought tolerant species. In addition to landscaping and watering programs, other mitigation measures suggested include:

- Early construction of drainage control features;
- Construction of temporary sediment basins to trap silt, where needed;
- Use of temporary berms and cut-off ditches where needed; and
- Use of temporary silt fences (coir works well) or straw bales to trap silt.

Use of sediment pouches placed at drainage catch basins to capture silt and sediment before the surface flow enters the drainage system or coir erosion and sediment control products is recommended. Water from dewatering should be treated in a settling tank and disposed of in the wastewater collection system and under no circumstances should it be allowed to enter the subsurface drainage system or nearby waterways.

OHA was also pleased to read on page xi of the DIES that the applicant intends to reduce, reuse and recycle materials and promote the "optimal use of solid wastes through programs of waste prevention, energy resource recovery, and recycling." However, other than tying into the city's proposed recycling plan and possibly using photovoltaics, we did not read much detail regarding these types of plans and OHA would be very interested in learning more about them and how specifically these goals will be accomplished.¹⁵

OHA would also like to point out that the applicant should consider that by 2020, 20% of Hawai'i's electricity is to be from renewable sources.¹⁶ Further, the Energy Advisory Committee's first of three major concerns for Hawai'i listed in their 2005 Functional Plan is the State's over dependency on oil and fossil fuels. The committee also lists these two objectives:

- A) To moderate the growth in energy demand through conservation and energy efficiency.
- B) Displace oil and fossil fuels through alternate and renewable energy resources.

As such, OHA recommends the use of not only photovoltaic cells but also small wind harvesting electrical generation for peripheral uses such as parking lot lighting. Solar energy should also be incorporated into the building plans. During construction, OHA urges the use of recyclable materials: steel studs and structural members, and wood products from certified sustainable sources.

OHA also recommends using the Leadership in Energy and Environmental Design (LEED) Green Building Rating System. This is the nationally accepted benchmark for the design, construction, and operation of high performance green buildings. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. Surface runoff generated by the facility should be stored or re-used for on site needs as part of a design concept attempting to reduce or eliminate any demands on the municipal storm drainage system. These are the types of things that OHA would like to see of a

¹⁵ Pages 14 and 22 of the DEIS had provided no details regarding the proposed sustainable 'green' community either.

¹⁶ See Act 95, Session Laws of Hawai'i which, in 2004 set that new original renewable portfolio standard goal.

project that seeks to "incorporate green building practices to be an environmentally-sound, healthy and resource-efficient community."¹⁷

OHA would like to suggest that the project area be landscaped with the type of groundcover that is comprised of drought tolerant native or indigenous species. Any invasive or aggressive non-native species should also be removed. Doing so would not only serve as practical water-saving landscaping practices and pollution filters, but also serve to further the traditional Hawaiian concept of mālama 'āina and create a more Hawaiian sense of place.

Further, OHA also notes that the biological assessment regarding flora as presented in the DEIS on page 36 is not complete:

Due to access issues that prevented the botanical consultants from surveying the detention parcel that terminates in Pearl Harbor (Parcel D2), the property was observed from a nearby footpath and appears to be dominated by kiawe. (emphasis added)

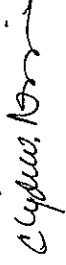
OHA recognizes that this is the applicant's proposal and, therefore, the applicant's responsibility to fulfill the requirements of an environmental assessment. If access to the property is an issue, (which clearly it is- the Navy has not given permission for the applicant to use this parcel) then the applicant should present an alternative along with the appropriate analysis for that alternative. Under no circumstances should a lack of access or information be used (much less presented in a DEIS) by an applicant as an excuse in an environmental review document. This frustrates the very purpose of the environmental review process which is to provide the public with information regarding all aspects of a proposed undertaking so that informed comments can be given and harmful effects mitigated. In short, OHA cannot perform our constitutional mandate to assess a proposed project for its potential impacts to our beneficiaries nor are we able to make this the best project it can be due to a lack of information.

OHA is relieved by the assurances given in the DEIS that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during ground disturbance, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. However, we are concerned about the details of the preservation plan and archaeological monitoring plan that is being prepared for such a large area with the potential for cultural deposits to be unearthed.

¹⁷ DEIS, page vii.

OHA apologizes for the timing of this review and we understand that your acceptance of these comments is discretionary. We do thank you for your understanding and time. If you have any further questions or concerns, please contact Grant Arnold at (808) 594-0263 or granta@oha.org.

Sincerely,



Clyde W. Nāmu'o
Administrator

C: Rodney Maile, Acting Director
State of Hawai'i, Land Use Commission
PO Box 2359
Honolulu, Hawai'i 96804-2359

C: Clean Water Branch
Environmental Management Division
State Department of Health
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

C: Office of Environmental Quality Control
235 S. Beretania St., Suite 702
Honolulu, Hawai'i 96813

C: Office of Planning, State of Hawai'i
Department of Business, Economic Development and Tourism
PO Box 2359
Honolulu, Hawai'i 96804-2359



August 11, 2008

W. FRANK BRANDT, FASIA
Chairman

THOMAS WILLEN, ASIA
President

R. STAN BUNGAN, ASIA
Executive Vice-President

RUSSELL H. CHUNG, ASIA
Executive Vice-President

YINCENT SUGENSKI
Vice-President

GRANT TAMERAKAM, AICP
Principal

THOMASINELLI, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

KIYUKI KISHIKAWA, ASIA
Associate

KIMIKAMI YUEN, LEED AP
Associate

SCOTT ALKA, AURIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
1031 Robop Street
ASU Tower, Suite 600
Honolulu, Hawaii 96813-3811
Tel: (808) 531-4100
Fax: (808) 531-4103
E-mail: yyadming@pbhawaii.com

HILLO OFFICE
1111 Avenue 504
Hilo Lagoon Center, Suite 310
Hilo, Hawaii 96720-4262
Tel: (808) 981-3353
Fax: (808) 981-4389

WAILUKU OFFICE
1297 Wili Wili Loop, Suite 4
Wailuku, Hawaii 96751-1271
Tel: (808) 242-2878

Mr. Clyde W. Nāmu'o
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

OHA stresses that this land is zoned Agriculture A-1 which requires that the greatest possible protection be given to these lands. (see Hawaii Revised Statutes Section 205) OHA is deeply concerned that this area be used for agricultural uses only. Our concerns are echoed by the myriad of laws and legislation supporting a strong agricultural economic base and retention of those lands primarily in agricultural pursuits in the specific project area. (see Hawaii Revised Statutes, Section 205, O'ahu General Plan and Sustainable Communities Plan; Section 1-115 of the City Subdivision Rules and Regulations; the State Coastal Zone Management Act; and even the city's 'Ewa Development Plan, last updated in 2000, which emphasizes that high-value farmland be preserved for agriculture for 3,000 acres in the general project area.) OHA stresses that only accessory agribusiness activities which meet the above intent are to be permitted in this area.

Hawaii Revised Statutes section 205-2 states that, "In the establishment of agricultural districts the greatest possible protection shall be given to those lands with a high capacity for intensive cultivation". That is exactly the kind of land that this project proposes to use and as such, OHA cannot reasonably see how the removal of 1,553,844 acres of prime agricultural lands currently in use does not run afoul of state and county land use plans, controls and policies.

Further, Hawaii Revised Statutes section 205-41 states;

It is declared that the people of Hawaii have a substantial interest in the health and sustainability of agriculture as an industry in the State. There is a compelling state interest in conserving the State's agricultural land resource base and assuring the long-term availability of agricultural lands for agricultural use to achieve the purposes of:

- (1) *Conserving and protecting agricultural lands;*
- (2) *Promoting diversified agriculture; -*
- (3) *Increasing agricultural self-sufficiency; and*
- (4) *Assuring the availability of agriculturally suitable lands pursuant to article XI, section 3, of the Hawaii state constitution.*

In 1961, the Committee on Lands and Natural Resources remarked that its goal in creating the State Land Use Commission was primarily to "protect productive agricultural lands... through state zoning." The high value assigned to agriculture lands was emphasized again by the 1976 legislature when they assigned Class A and B agricultural lands "additional protection... [against county approval of] agricultural subdivisions."

Further, and as mentioned in Hawaii Revised Statutes section 205-41, even our state constitution emphasizes that:

The State shall conserve and protect agricultural lands, promote diversified agriculture, increase agricultural self-sufficiency and assure the availability of

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Nāmu'o:

Thank you for your letter dated April 17, 2008 (OHA's reference number HRD08/2945B) which was dated nine days after the end of the public review period set pursuant to section 11-200-22, Hawaii Administrative Rules ("HAR"). We offer this response to your comments although state law does not require your comments be considered or responded to. By our response, we do not intend to waive or relinquish any rights that we have or may have under law, including the right to object to any potential standing that you may claim to have or allegations that you may raise pursuant to Chapter 343, Hawaii Revised Statutes ("HRS") and Title 11, Chapter 200, HAR. We have reviewed your letter and offer the following responses to OHA's comments.

Agriculture

Office of Hawaiian Affairs Comment: "OHA understands, and as the applicant has pointed out, that the City and County of Honolulu is in a housing crisis and our collective population is expected to grow in the foreseeable future. We also understand that the amount of available land for our homes is scarce. Naturally, this puts us all in a bind. However, OHA fundamentally cannot support a project that proposes to remove the best and most highly-protected agricultural lands on this island from current and active production. OHA notes that these lands have been described as the "golden triangle" on O'ahu, and that they have historically been some of the most productive and consistent agricultural lands in our State.

Mr. Clyde W. Nāmu'o

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

August 11, 2008

Page 3

agriculturally suitable lands. The legislature shall provide standards and criteria to accomplish the foregoing.

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

Additionally, and as the applicant knows, most of the soils in the project area are rated A or B. This is significant because A and B soil classified agriculture lands have additional layers of protection given to them in Hawaii Revised Statutes section 205-4.5 (16)(b) which does not allow a county to approve a subdivision of these lands unless subdivision is made subject to restrictions that keep them in agricultural use."

Response: We acknowledge OHA's comments regarding: Hawaii's Revised Statutes, Section 205; O'ahu General Plan and Sustainable Communities Plan; Section 1-115 of the City Subdivision Rules and Regulations; the State Coastal Zone Management Act; the Land Study Bureau's Detailed Land Classification System; and the 'Ewa Development Plan.

We also acknowledge OHA's comments regarding the government's constitutional duty to protect agricultural lands through state zoning. Although we understand OHA's concern that Class A and B lands are proposed for residential development, the cited classifications, laws and regulations do not prohibit rezoning and reclassification of agricultural lands.

The laws pertaining to reclassification and enumerated in Chapter 205, HRS do not preclude the applicant from requesting reclassification simply because lands can be used for the cultivation of crops. Furthermore, the section of the Constitution cited on Page 3 of OHA's comment letter has not been fully implemented by statute.

Pursuant to Act 183, 2005 Session Laws of Hawaii'i, the counties are currently undertaking a process to identify "Important Agricultural Lands" (IALs) within their respective jurisdictions. Once these lands are identified by the counties, Land Use Commission is required before they are officially designated IALs. IALs across the State still have yet to be identified. However, past planning actions by the City and County of Honolulu give indication that they would be hesitant to designate lands within their defined urban growth boundary as IALs.

Ho'opili's proposed action is consistent with the growth policy for 'Ewa. 'Ewa is a key component of the City and County of Honolulu's directed growth policies. In 1974, Donald Wolbrink of Harland Bartholomew developed a visionary plan for Kapolei. After much public discussion, the decision to direct urban growth to the 'Ewa area became the official policy of the City and County of Honolulu. In 1977, the Honolulu City Council approved a new General Plan that designated 'Ewa as the location for a Secondary Urban

Mr. Clyde W. Nāmu'o

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

August 11, 2008

Page 4

Center for O'ahu. The Secondary Urban Center was to be the focus of major economic activity, housing development, and a center for government services, while preserving areas such as Wai'anae and the North Shore for rural uses.

Ho'opili's proposed action follows in the footsteps of various state, City, and private planned and developed projects in the area. DHHL, HHFDC, and UHWO have all developed former agricultural lands immediately adjacent to the proposed Ho'opili project into the Villages of Kapolei, University of Hawai'i - West O'ahu Campus, and the Department of Hawaiian Home Lands' East Kapolei development. All these developments also fall within the City-established urban growth boundary. Most of these developments have occurred where the Land Use Commission has approved State Land Use District Boundary amendments from Agriculture to Urban. Also, as OHA is aware, DHHL's position is that it is exempt from State land use laws, County zoning and governmental land use policies, and their decisions have also urbanized hundreds of acres on the 'Ewa Plain.

The State appears to maintain its commitment toward growing the Second City in Kapolei by its construction of State office building, and a planned new judiciary complex on former agricultural lands. It has been reported that OHA itself is seeking 110 acres of land in Kalaheon that while most recently used for military use, was previously used for sugar cane cultivation.

Alternative Analysis

Office of Hawaiian Affairs Comment: "OHA realizes that housing is an important issue for our beneficiaries and a difficult one for this State. This is why we seek to improve upon environmental review documents such as these so that public input can be considered; impacts mitigated and proposed projects become the best that they can be. This is also why we urge the applicant to provide us with additional alternatives analysis. The heart of an environmental review document is its discussion of alternatives. OHA seeks to find a rigorous and objective analysis of all reasonable alternatives to the proposed action, including a discussion of the "no action" alternative as a base-point to which the proposed action can be compared. This was not done in this case. The Alternatives Analysis section of the Executive Summary is nine lines long and the Alternatives to the Proposed Action section (6.0) of the DEIS is but four pages long. A proposed action of this magnitude dealing with an issue of this importance requires more attention than:

Further study or delay of any proposed development on the property would not be consistent with the Ewa Development Plan or the County's objective of directing growth to 'Ewa. Therefore, various alternatives for the site were rejected

OHA notes that being in a hurry or citing previous studies is not reason to skirt an alternatives analysis. Neither is an arrangement of consistent goals, as there are just as many land use policies and goals (if not more) that the applicant proposes to violate. OHA understands that this issue is a difficult one; however, as this is the applicant's

proposed project we ask them to provide valid alternatives analysis for review and public comment in order to make this a better project and avoid further unnecessary costs."

Response: Based on OHA's comments, Section 6.0 Alternatives To The Proposed Action of the EIS will be revised as follows:

In compliance with the provisions of Title 11, Department of Health (DOH), Chapter 200, Environmental Impact Statement Rules, Section 11-200-10(6), the alternatives considered are limited to those that would satisfy the objectives of the proposed mixed-use development, while minimizing the potential for adverse environmental impacts. The feasible alternatives must realistically address the project's economic characteristics while also responding to the surrounding land uses that will be impacted by the project. In conformance with applicable regulations, other possible alternatives have been investigated to identify alternative sites, the appropriate uses for the property, and how they would best be accomplished.

6.1 "NO-ACTION" ALTERNATIVE

The "no-action" alternative would not be consistent with stated governmental policies, which direct future growth to the Ewa region. The City and County of Honolulu General Plan states:

Encourage development within the secondary urban center at Kapolei and the Ewa and Central Oahu urban-fringe areas to relieve developmental pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.

Under this alternative, the site would remain as agricultural land, underutilized in terms of meeting the demand for residential homes (including affordable homes) and accompanying land uses. The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall. The demand for housing could result in the following scenarios or combinations thereof: there would be more pressure to develop in the other districts, including the rural areas and other areas currently used for cultivation; there could be a demand for higher density housing in undeveloped areas of Ewa at a density not experienced to date; there would be more "doubling up" (larger number of persons per household, with more than one family under roof); those that are not willing to

put up with the previously described scenarios may decide to relocate to the U.S. mainland where housing prices have dropped.

The "no-action" alternative was rejected because it is not consistent with government plans to develop Kapolei as the Second City.

6.2 ALTERNATIVE SITES

There are very few large parcels left on O'ahu that are designated for residential development. The largest amount of developable land that is undeveloped lies in Central O'ahu and on the North Shore. As shown on the Ewa Development Plan, the Petition Area is designated mostly Low and Medium Density Residential. As such, the City and County of Honolulu has long recognized that the Petition Area is best used for residential and other development. Directing growth to Ewa and in the "urban-fringe" portions of Central O'ahu reduces the pressure to develop outside of the Urban Growth Boundary of Central O'ahu, and the North Shore, Ko'olau Lea, Ko'olau Poko and Wai'anae districts. This alternative has been rejected because it would be clearly contrary to General Plan policy. The potential benefit of this alternative is that for those that object to further development on the Ewa Plain, it might be preferable for development to occur elsewhere on O'ahu, such as in the Primary Urban Center, East Honolulu, Central O'ahu, North Shore, Ko'olau Lea, Ko'olau Poko and Wai'anae districts.

The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall.

6.3 ALTERNATIVES RELATED TO DIFFERENT DESIGNS OR DETAILS OF THE PROPOSED ACTIONS WHICH WOULD PRESENT DIFFERENT ENVIRONMENTAL IMPACTS

Different designs could be applied to the project, and depending on the density and design capacity, would result in different environmental impacts. For example, a higher density project that kept the same residential unit count as proposed (11,750) would reduce the buildable area (a positive benefit) and possibly reduce the quantity of surface runoff (a positive benefit). This Another potential benefit of this alternative is that it would likely be easier to serve by bus and correspondingly increase ridership. However, the residential buildings

would be larger and taller. This alternative would not allow as wide a range of residential products to market and was thus rejected. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion).

Another alternative would be to set aside less open space and to spread out the community over a larger land area. Such an alternative is best portrayed by the current Kapolei Long Range Master Plan and Ewa Development Plan Land Use Map designations for the Petition Area. This alternative would reduce the density to some a positive benefit but consume more land, increasing the quantity of surface runoff, and requiring a much larger investment in grading and infrastructure. This alternative would make it difficult for residents to be served by bus, and even more difficult by high-capacity transit. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). This alternative was also rejected.

The demand for safe drinking water and the quantities of wastewater, solid waste, and traffic generated would vary with different designs, depending on the number/quantity of residential units, schools, commercial square footage, and roads.

6.4 ACTIONS OF A SIGNIFICANTLY DIFFERENT NATURE WHICH WOULD PROVIDE SIMILAR BENEFITS WITH DIFFERENT ENVIRONMENTAL IMPACTS

One scenario that would be significantly different from the proposed action is that an elevated rail line and accompanying transit stops would not be built through Ho'opi. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts (assume greater traffic impacts than without the HHCTC project); and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). The impacts of this scenario will be better described in the upcoming HHCTC DEIS.

For the 'Ewa district drivers enduring the longest morning commutes to the Central Business District or UH Mānoa, the modes of transportation will continue to be limited to: private motorized vehicle (including zipper lane), TheBus, TheBoat, Vanpool, et cetera. While this is a scenario that could inevitably result in lengthening commute times, individual commuters will either bear with the commute in return for the comfortable lifestyles offered by their homes in 'Ewa; move from their homes in 'Ewa and move closer to their workplaces or schools; or find schools and/or employment in the 'Ewa region. The opening of UHWO will reduce traffic from those undergraduate students in Leeward and Central O'ahu who commute to UH Mānoa, and indirectly reduce the demand for student housing on the UH Mānoa campus (reducing the demand for off-street parking demand on campus, reducing the demand for on-street parking in the surrounding neighborhoods, increasing the supply of student housing on campus, and reducing the demand for student housing off-campus). If the Petitioner is allowed to develop a mixed-use (residential/commercial/office/light industrial) project as proposed, then, more employment opportunities will be provided to existing residents of the region, reducing the need for some 'Ewa residents to commute outside of the District to work. To offset the non-implementation of the HHCTC project, the City and County of Honolulu may decide to increase The Bus and The Boat services. The positive benefits of this alternative is that the visual impact impacts of an elevated rail system would be avoided as well as long-term commitment of State and Federal funds for the HHCTC project. This alternative is not desirable, but feasible.

6.5 THE ALTERNATIVE OF POSTPONING ACTION PENDING FURTHER STUDY

Development of the 'Ewa region as O'ahu's Second City has been studied and planned for many years. Further study of any proposed development on the property would only be delaying what has long been proposed in the Ewa Development Plan. Therefore, this alternative was rejected, as it would not achieve the overall objectives for the project, which would create a mixed-use community that more employment opportunities will be provided to existing residents of the region, reducing the need for some 'Ewa residents to commute outside of the District to work. The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Occasionally, however, continued cultivation of the site would generate dust when portions of the site are harvested and plowed. Implementation of this alternative will temporarily avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion).

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'ŌPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 9

Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall.

Affordable Housing

Office of Hawaiian Affairs Comment: "In terms of housing, OHA additionally notes that according to the Center on Budget and Policy Priorities webpage, (<http://www.cbpp.org/4-17-06sfp.htm>); as of April 2006, the poverty level for a two-parent family of four in Hawaii is \$19,961. As such, we ask how many of the applicant's proposed homes will be made to be affordable and to what standard is affordable defined."

Response: The Center on Budget and Policy Priorities, a Washington, D.C. think-tank, does not set affordable housing policy for the State or City. Affordable housing requirements are typically set and approved by the counties, in this case, by the Honolulu City Council as may be specified in conditions set forth in as zoning conditions requiring the developer to develop affordable housing units. The Petitioner's intent is to comply with all legal requirements concerning affordable housing, including mandatory restrictions on transfer, sale/buyback and use.

Drainage

Office of Hawaiian Affairs Comment: "Regarding drainage, OHA notes that Kalo'i Gulch is proposed to be shared by all of the current users and the University of Hawai'i at West O'ahu, the Department of Hawaiian Homelands, the Kroc Center, Haseko's Ocean Pointe development as well as the applicant. Therefore, we will hold the applicant to their statement made on page 223 of the DEIS that discharge flow rates will not exceed pre-development conditions and that the rules relating to water quality standards will be adhered to."

Response: As noted on page 90 of the Draft EIS:

Approximately 100 acres of the Ho'opi'i project are within this watershed... With respect to the portion of the project within the Kalo'i drainage basin, the project will be creating on-site detention basins to collect all storm water runoff and discharge the flow at a rate that will not exceed pre-development conditions. The project will also be providing storage and detention to meet the Rules Relating to Storm Drainage Standards with respect to water quality standards. The basin size could be decreased at some time in the future when the terminus of Kalo'i basin is finalized. All developed projects discharging to the Kalo'i basin currently have discharge restrictions and these restrictions will continue until the Kalo'i basin terminus is finalized.

Please note that the portion of the project within the Kalo'i drainage basin represents only approximately 6% of the entire petition area.

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'ŌPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 10

Office of Hawaiian Affairs Comment: "However, we do seek clarification on this point because page x of the DEIS states, "Over time the project will result in an increase in wastewater being generated that currently being generated on-site (by agricultural activities)."

Response: "Waste water" is a term usually referred to when the contents of human waste is flushed into toilets and liquid wastes are disposed into their sinks. As there are only a limited number of humans currently employed on the Petition Area by existing lessees, the amount of waste water generated is relatively low. As Ho'opi'i is developed and occupied, the daytime (and nighttime) population will significantly increase, and most residents and visitors (such as those that live elsewhere but work, play, shop or study in Ho'opi'i) will either turn on faucets that will cause water to drain into sinks and/or generate human waste that will be flushed into toilets. All of this used water and waste material will be collected and treated at the Honouliuli Wastewater Treatment Facility, and some of it will be treated it for reuse (industrial use or irrigation of landscaping).

Office of Hawaiian Affairs Comment: "OHA is also confused as to whether discharge rates will not exceed pre-development conditions because of the statement on page xi: "The project will increase impervious surfaces such as roadways, roof, paved parking areas, and sidewalks. These surfaces will cause an increase in storm water discharge within the Petition Area."

Response: The statements OHA refers to on pages x and xi refer to different processes: one involving wastewater (human waste), and the other drainage (what happens to rain water when it falls on either undeveloped or developed lands). To put it very simply, the concern with drainage on property "A" is what damage the rain water (usually more appropriately referred to as "storm water") could present to neighboring property "B" (or properties) which is located at an elevation lower than property "A." Again, simply put, current laws allow no more runoff from property "A" to enter property "B" than occurs before new development. Assuming that development of property "A" increases the amount of rain water to collect, then calculations are made to estimate how much more storm water is going to collect on site than under previous conditions. (Please note that not in all situations will new development necessarily result in surface conditions to collect more storm water). We acknowledge that compared to existing conditions, development of the Petition Area will increase the amount of storm water that will collect on site, but the Petitioner is aware that with the increased storm water, it will not be permitted to allow the increased storm water to leave the site in greater quantities, or more specifically, velocities, than it does now.

Office of Hawaiian Affairs Comment: "OHA wishes to point out that there are a host of State water quality standards that must be met by this project. For example, all Hawai'i state waters are classified as Class A or Class AA. Class A waters have strict pollution discharge regulations to protect them for recreational and aesthetic enjoyment. This

Mr. Clyde W. Nāmu'o
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 11

includes the Clean Water Branch requirements that any project and its potential impacts to State waters meet the following criteria:

- Anti-degradation policy (Hawai'i Administrative Rules (HAR), Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
- Designated uses HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
- Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

OHA further notes that the Kalo'i Gulch drainage way (as do the Honouliuli and West Loch drainage basins which are potentially to be used for this project) eventually discharges into the ocean. As such, OHA inquires as to the monitoring plan proposed by the applicant to ensure that the Rules Relating to Storm Drainage Standards and discharges into State waters are being complied with."

Response: The project will comply with all regulations set forth by 33 CFR 323.4. The project's detention/retention facilities have two purposes: to reduce the project's peak flow to predevelopment conditions and to provide water quality detention. As noted on page 92 of the Draft EIS:

The project will be providing detention basins to meet City and County of Honolulu Standards for water quality treatment. Structural methods may also be used to meet water quality requirements of the Rules Relating to Storm Drainage Standards. Structural methods include the use of Stormceptor® type storm drain manholes.

Also, monitoring and compliance verification will occur on two fronts:

1. It is primarily the project's (and its Contractors) responsibility to comply with all BMP (Best Management Practices) conditions to ensure that Rules Related to Storms Water Standards as well as all NPDES (Construction Activities) conditions are met. BMP tools used to ensure compliance are silt fences, stabilized gravel entrances, cut-off swales, detention basins, sediment traps and filter berms to name a few. Contractor standard monitoring requirements typically include photo documentation (pre-construction, post-construction and at every time there is rainfall event that that exceeds 0.5 inches in any 24-hour period results in a discharge) and routine checks of all the utilized BMP features.
2. The City has assigned inspectors that provide regular visits to project job sites to verify the Contract and project are in compliance. The State Department of Health also has enforcement personnel who visit job sites.

Mr. Clyde W. Nāmu'o
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 12

Office of Hawaiian Affairs Comment: "OHA also sees that the DEIS on page 33 states, "Proposed drainage improvements within the Petition Area include on-site detention and retention basins, which will promote on-site infiltration of surface water and facilitate groundwater recharge." OHA points out that this is in contradiction to the statement made on the previous page of the DEIS (page 32) which indicates that surface water is not tied to groundwater: "Within the Petition Area, surface water in the channel (Honouliuli) does not appear to be connected to the groundwater."

Response: Please refer to Figure 4.2. The project site encompasses three distinct drainage basins: Kalo'i, West Loch and Honouliuli. Please note that the Makai Detention area and outlet services the drainage from the West Loch Drainage Basin. The statements you mention above are not contradictory because the statement on page 33 discusses the potential for groundwater recharge from on-site detention and retention basins for the West Loch Drainage Basin, and the statement on page 32 refers to the source of water flowing in Honouliuli Stream through the Honouliuli Basin.

Within the same paragraph that OHA cites, it is also stated that: "Honouliuli Stream channel acts as the primary channel for runoff from part of the Petition Area and drainage of the watershed upstream." The portion of the Petition Area within the Honouliuli Stream drainage basin is approximately 635 acres or approximately 10% of the Honouliuli Stream drainage basin mauka of Farrington Highway. Stormwater that collects in Honouliuli Stream drainage basin mauka of the Petition Area, collects and flows into Honouliuli Stream.

Office of Hawaiian Affairs Comment: "OHA urges the applicant to be aware of the potential for water in the detention and retention ponds to seep into the groundwater system. As such, we ask if an overflow pipe will be included in these ponds and what are the impacts from the expected overflow."

Response: The location the project's proposed retention and detention systems are not over the primary drinking water aquifer. It is anticipated that their grass, bottoms and ability to enhance percolation will be beneficial to the storm water principles cited in your comments regarding storm water quality and management.

Office of Hawaiian Affairs Comment: "Further, we ask that the applicant provide analysis as to the effects of the increased discharges from their proposed use of the Petition Area drainage basins on the nearshore environment."

Response: The information provided in the Drainage Master Plan (reproduced in its entirety as Appendix O of the Ho'opili Draft EIS Volume II) was intended to act as the analysis related to discharges into the near shore environment. The goal of the Storm Water Quality Section of the City Drainage Standards is to address the long term impact on water quality by establishing controls on timing and rate of discharge. Specific emphasis is placed on controlling timing of release from smaller frequent storms. This the analysis provided in the Drainage Master Plan (Appendix O of the Ho'opili Draft EIS

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 13

Volume II). By meeting the timed release requirements of the City Drainage Standards it is correlated that the water quality has been treated to best practicable levels.

Office of Hawaiian Affairs Comment: "In particular we are concerned about the effects from this project on fishing grounds, limu and fishponds, all of which are found in the area and all of which are being currently used by our beneficiaries for their constitutionally protected cultural practices. We note that the Cultural Impact Assessment states on page 98 that there are such practices in the Project Area but that:

The Project Area is approximately 600m (2,000 feet) back from the coast therefore marine resources will not be affected.

OHA disagrees with this statement and seeks clarification as to what the basis was for this particular determination. Analysis for this type of conclusion in an environmental review document should be accompanied by such things as instream flow rates, biological assessments and brackish water content for the area. This is particularly important because we see that our beneficiaries' interests will be negatively impacted by this action in this regard."

Response: We appreciate OHA's concern regarding the above statement. Usually, much of the issue surrounding cultural practice pertains to public access, and therefore the statement should have read:

The Project Area is approximately 600m (approximately 2,000 feet) back from the coast. Therefore, access to marine resources will not be affected.

The above sentence will be added at the end of the third to the last paragraph of Section 4.2 Cultural Resources of the Final EIS.

Office of Hawaiian Affairs Comment: "Regarding the makai detention basin, OHA notes that permission of the Navy would be required for this basin to be built and not only has the Navy not given its permission, they have refused and, despite what may have been in the past, there is no indication that OHA is aware of that they may acquiesce to the applicant's request. Naturally, this raises a host of concerns for all involved, no doubt mostly to the applicant. However, OHA does wish to see analysis provided in an environmental review for all aspects of a proposed project that are truly feasible at the time of writing the document. Future possibilities and conditionals cannot provide the basis for substantive review and meaningful public input.

To help mitigate the adverse impacts of a proposed project and make it the best it can be OHA urges that the applicant provide information and analysis for parts of the project that are likely to come to fruition. We point this out because we also see that this project hinges upon not only Navy permission that is not forthcoming, but also a proposed building out of a wastewater treatment plant and associated improvements, the "assumption" for a proposed transportation system servicing the area, and recycling programs that do not exist yet."

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 14

Response: Negotiations between the Applicant and the Navy regarding the referenced Makai Detention parcels are ongoing. If applicable, the Applicant will comply with all relevant Federal Codes, Regulations and Rules including a Section 106 review. However, please note that the proposed project does not "hinge" upon outlet for the makai detention basin through Navy lands. As noted on page 91 of the Draft EIS, if the outlet is not permitted by the Navy:

The alternative drainage solution if the overflow across Navy property cannot be resolved is to construct retention basins on site holding back the total volume of a 100 year- 24 hour storm. These basins would be located on the southern portion of Parcel C.

Office of Hawaiian Affairs Comment: "Regarding storm water in general, OHA wishes to see storm water as a resource to be captured and conserved rather than a nuisance to be channeled and drained away. As storm water travels down a drainage system, it accumulates industrial waste, pesticides, oils, and chemicals. These pollutants quickly settle into the nearshore sediments and are re-suspended into the water column when disturbed.

Persistent organic pollutants (POPs) are organic compounds that linger in the environment, travel through the food web, and pose risks to human health and the environment. Organic hydrocarbons, including petroleum products, are examples of POPs. POPs are most commonly introduced to marine systems via discharged sewage and stormwater effluent, terrestrial runoff, and oil spills. POPs can also bioaccumulate in the nearshore species that inhabit these areas.

Therefore, OHA recommends the use of a stormwater management system that would filter these and other pollutants out and slow the amount of sediments entering our waters. The following four water management methods and erosion control structures are used by the Food and Agriculture Organization of the United Nations:

- runoff harvesting (catching runoff for supplementary irrigation);
- total absorption or infiltration;
- runoff diversion (redirecting excess water); and
- runoff spreading (distribution of runoff energy)."

Response: The OHA comments on storm water primarily relate to management and use as a resource. The Drainage Master Plan (Appendix O of the Ho'opili Draft EIS Volume II) focuses on the management aspects related to minimizing deterioration of near shore water quality. The management aspects focus on controlled timing as required by current standards. Timed release is especially effective at addressing sediment loads, but also indirectly addresses persistent organic pollutants (POPs) by capture due to attachment to the sediment load.

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 15

With respect to use of storm water as a resource, the drainage consultant supports the management methods cited by OHA (from the Food and Drug Organization of the United Nations), and adds that the Drainage Master Plan (Appendix O of the Ho'opili Draft EIS Volume II) partially implements some of the general concepts.

Office of Hawaiian Affairs Comment: "OHA is pleased to see that the applicant is proposing to use retention and detention ponds where possible. OHA does remark that if ponds are used, they should be shallow with slow sloping bottoms. The slow sloping sides are needed for safety if people happen to fall in. A surrounding area around the pond should be provided for water storage when heavy rains are present. OHA does ask if retention and detention ponds will be installed near each other in a row so that the water will get held up in the detention pond and slowly drain into the retention pond. The detention pond will help eliminate flooding and the retention will hold the remaining water. The use of permeable paving materials can also retain some of the rain that falls and catch basins can capture and help to slow the runoff thereby reducing turbidity and sediment runoff.

Retention and detention ponds also serve to remove pollutants, such as POPs and trash. Since retention and detention ponds are the drainage basin for an area, pollutants, trash and debris are washed into these areas often after heavy rains or wind rather than entering the nearshore environment. Retention and detention ponds can help to capture many types of pollutants. Also, OHA recommends allowing native and drought resistant 'thick' vegetation or "buffer strips" to grow where possible to filter and slow runoff and soak up pollutants. Trees, shrubs, and groundcover absorb up to fourteen times more rainwater than a grass lawn and they don't require fertilizer."

Response: The retention/detention basins by definition accomplish partial absorption and spreading. Runoff harvesting is not anticipated to be practicable. This is primarily due to O'ahu's short runoff time of concentration (peak flows occur for very short periods) and sustainability of the runoff source (retention/detention basins are anticipated to be essentially dry for a majority of the year). We will also take into consideration OHA's suggestions regarding vegetation types, and slope angle.

Office of Hawaiian Affairs Comments: "OHA also suggests that any drainage channels be altered from their smooth bottoms with the addition of berms, blocks, or recessed 'checkerboards' to further reduce the introduction of sediments and turbidity into the nearshore environment.

OHA appreciates the applicant's intent to reduce inflow and infiltration via manholes, which should result in increased capacity in the existing system and hopefully reduce peak flows, thereby mitigating the need for wet-weather storage facilities.

As you know, inflow of storm runoff through manhole covers, particularly in areas that are inundated due to poor drainages, can be significant. In addition to the applicant's already mentioned procedures for manholes, OHA also suggests that the applicant

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 16

consider that substantial inflow could potentially enter manholes below the frame due to misalignment, damaged mortar or cone, or other problems. In some cases, rain induced infiltration may also enter through the manhole cone if the surrounding material is highly permeable and the cone exhibits porous brick mortar joints.

Section 1-4.2 (4) (a)(3) of the Rules Relating to Storm Drainage Standards states that the bottoms of manholes shall be shaped to channelize flow and sloped with the slope of the pipe. OHA asks if the Stormceptor type storm drain manholes will accomplish these goals."

Response: OHA has commented on construction techniques for channel bottoms and manholes. New construction will be guided by County Standards. Where possible and County Standards allow, rough concrete channel bottoms will be used. New construction following proper design should not create poor drainage allowing for inundation through manholes. With respect to Stormceptor® manholes, construction is almost identical to a City and County manhole, with a feature added to collect "first flush" oils and sediment from more frequent storm events.

Office of Hawaiian Affairs Comment: "OHA was surprised that this DEIS did not contain information regarding Best Management Practices (BMPs). The cost of improperly maintained BMPs can be devastating to a business and community. Improperly maintained BMPs not only decrease in efficiency of removing pollutants, they also create environmental hazards (such as flooding and contamination), placing an owner or property manager at risk for liability.

Structural best management practices seem to be most effective when they can be combined in a treatment train. "Treatment train" refers to the application of a series of physical stormwater best management practices to achieve improved drainage water quality. However, BMPs will fail if improperly located within the treatment train or not properly maintained.

Once implemented, however, BMPs require monitoring to ensure that they are achieving the objectives for which they were selected. B monitoring also involves scheduling of inspections to ensure that the outcomes of BMPs meet expectations. At the heart of BMP effectiveness monitoring is a listing of each B, its expected performance and an assessment of whether the controlled value (noise, dust, water quality, etc.) is within targeted limits.

OHA, therefore, inquires as to the applicant's BMP plan (including monitoring and effectiveness) which should be prepared and implemented to minimize the impacts on water quality. Long term operational impacts such as increased pollutant loads in storm discharges should similarly be included in the plan and treated to the best degree possible prior to discharge in order to conform with Hawai'i Administrative Rules §1 1-54-03e)(2)(A)(i) and (iii).

Mr. Clyde W. Nāmu'o
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 17

Regarding soil erosion, the erosion control standards and guidelines State that large projects like this one (Categories 4 and 5) must utilize the Universal Soil Loss Equation to evaluate and compare existing conditions with relative soil loss rates caused by construction and post-construction activities not exceeding the maximum allowable soil loss rates for Oahu. (see www.cleanwaterhololulu.com/storminfoices/swmp/app-c2.pdf) and also Rules Relating to Storm Drainage Standards at www.cleanwaterhololulu.com/storminfoices/swmp/app-cl.pdf) OHA inquires as to the nature of the soil erosion rates and subsequent discharge that the applicant calculates will occur as a result of this proposed project."

Response: The last paragraph of Section 4.8.4, *Drainage Facilities, Anticipated Impacts and Mitigative Measures* of the Draft EIS will be revised to read as follows:

Surface water quality can be impacted through development. Per comments received by the State Department of Health Clean Water Branch, any discharges related to project construction or operation activities shall comply with the applicable State Water Quality Standards as specified in Chapter 11-54, HAR. Further, the DOH Clean Water Branch wrote that the Hawaii Revised Statutes, Subsection 342D-50(a), requires that "In no person, including any public body, shall discharge any water pollutants into state waters, or cause or allow any water pollutant to enter state waters except in compliance with this chapter, rules adopted pursuant to this Chapter, or a permit or variance issued by the director." The project will need to obtain NPDES permits and Grading Permits (as previously identified in the DEIS). Both required permits have substantial effort identified in their applications specifically addressing BMP issues. The substantive parts of the permitting processes focus on BMP tools and monitoring. Features will include: stabilized gravel entrances, siltation berms, diversion of storm water around work areas, use of detention basins, diversion swales, filter traps at catch basins, calculation of soils losses meeting acceptable levels and monitoring plans. BMP's are an important part of current construction practice. The project will be providing detention basins to meet City and County of Honolulu Standards for water quality treatment. Structural methods may also be used to meet water quality requirements of the Rules Relating to Storm Drainage Standards. Structural methods include the use of Stormceptor® type storm drain manholes.

Office of Hawaiian Affairs Comment: "To mitigate these negative effects, OHA recommends cleaning job-site construction equipment and establishing groundcover as quickly as possible after grading with native or endemic drought tolerant species. In addition to landscaping and watering programs, other mitigation measures suggested include:

- Early construction of drainage control features;
- Construction of temporary sediment basins to trap silt, where needed;
- Use of temporary berms and cut-off ditches where needed; and
- Use of temporary silt fences (coir works well) or straw bales to trap silt."

Mr. Clyde W. Nāmu'o
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 18

Response: We appreciate the information provided. Please note that the first paragraph of Section 3.3, *Soils, Anticipated Impacts and Mitigative Measures* of the Draft EIS will be revised to read as follows:

During project construction, there is a potential for soil loss through the generation of dust and water-borne soil erosion as areas are graded. All grading operations will be conducted in accordance with dust and erosion control and other requirements of the City and County of Honolulu Grading Ordinance and all applicable provisions regarding Fugitive Dust set forth under Section 11-60.1-33, HAR regarding. A NPDES permit will also be required prior to construction to address construction-related runoff. Additionally, a watering program will be implemented during construction to minimize soil loss through fugitive dust emission. During the public review period, the Department of Health (DOH) Clean Air Branch (CAB) recommended that a dust control management be prepared. The DOH CAB also provided additional examples of measures that can be implemented during construction:

- *where possible, for areas involving mixed land uses, buffer zones be established to alleviate potential dust nuisance problems;*
- *planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;*
- *providing an adequate water resource and watering program at the site prior to start-up of construction activities;*
- *landscaping and providing rapid covering of bare areas, including slopes starting from the initial grading phase;*
- *minimizing dust from shoulders and access roads;*
- *providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and*
- *controlling dust from debris being hauled away from the project site.*

In addition, during the public review period, the Office of Hawaiian Affairs wrote: OHA recommends cleaning job-site construction equipment and establishing groundcover as quickly as possible after grading with native or endemic drought tolerant species. In addition to landscaping and watering programs, other mitigation measures suggested include:

- *Early construction of drainage control features;*
- *Construction of temporary sediment basins to trap silt, where needed;*
- *Use of temporary berms and cut-off ditches where needed; and*
- *Use of temporary silt fences (coir works well) or straw bales to trap silt.*

Office of Hawaiian Affairs Comment: "Use of sediment pouches placed at drainage catch basins to capture silt and sediment before the surface flow enters the drainage

system or soil erosion and sediment control products is recommended. Water from dewatering should be treated in a settling tank and disposed of in the wastewater collection system and under no circumstances should it be allowed to enter the subsurface drainage system or nearby waterways."

Response: Sediment filters at catch basins were identified as one of the BMP tools included in our earlier response to your BMP comments. Dewatering will be treated in accordance with the allowed criteria in the NPDES Form G permit process. The need for dewatering for the project should be minimal or non-existent.

Recycling

Office of Hawaiian Affairs Comment: "OHA was also pleased to read on page xi of the DEIS that the applicant intends to reduce, reuse and recycle materials and promote the "optimal use of solid wastes through programs of waste prevention, energy resource recovery, and recycling." However, other than tying into the city's proposed recycling plan and possibly using photovoltaics, we did not read much detail regarding these types of plans and OHA would be very interested in learning more about them and how specifically these goals will be accomplished."

Response: In response to your comments, the last five paragraphs of Section 4.8.5 *Solid Waste Disposal Facilities, Anticipated Impacts and Mitigation Measures* will be revised to read as follows:

According to the U.S. Environmental Protection Agency, in 2006, individuals recycled 1.5 pounds of our individual waste generation rate of 4.6 pounds per day, for a net waste generation amount of 3.1 pounds per day. Assuming an average household size of 3.0 persons, at full build-out, the solid waste generated by the project is estimated to average approximately 109,275 pounds per day. According to the City and County of Honolulu, approximately 15 percent of residential solid waste is recyclable newspaper, aluminum, glass and plastic, and 25 to 30 percent is compostable yard trimming. In the future, the H-POWER plant will need to be expanded or an increased emphasis will need to be placed on recycling to dispose of the solid waste.

Recycling will be encouraged within the project including the reuse and recycling of green waste generated during construction clearing and grubbing activities, the use of recycled construction and demolition wastes and the use of materials made from recycled products, the use of locally produced compost as available for landscaping, and the provision of space for recycling bins in the detailed design of the community. As such, a construction waste recycling plan will be prepared before the start of construction.

The City and County of Honolulu is restarting its curbside pick up recycling program. In November, 2007, two pilot curbside recycling programs began in Mililani and Hawai'i Kai. During the six to twelve month evaluation period, the

City and County of Honolulu Department of Environmental Services staff will be coordinating plans for islandwide expansion.

On June 27, 2008, the Associated Press reported that Mililani and Hawai'i Kai residents have recycled 54 percent of their cans, bottles, newspapers and green waste during the city's six-month curbside recycling pilot project. City Officials with the City and County of Honolulu Department of Environmental Services (DES) are reportedly satisfied with the results and are moving forward with plans to provide some 160,000 O'ahu homes the curbside recycling service by May 2010. In the new plan, the city will collect garbage and recyclables each once a week. The DES will no longer have garbage pickup twice-weekly. A study released by DES predicts the program will divert an estimated 53,809 tons of mixed recyclables and green waste from O'ahu landfills. They plan to begin expanding the program to more communities in November 2008.

The goal for waste management is to appropriately reduce, reuse and recycle materials, to minimize generation of solid waste, and achieve diversion from landfills. As such, in conformance with Chapter 344-4(2), HRS, the project will promote the optimal use of solid wastes through programs of waste prevention, energy resource recovery, and recycling.

Resources

Office of Hawaiian Affairs Comment: "OHA would also like to point out that the applicant should consider that by 2020, 20% of Hawai'i's electricity is to be from renewable sources. Further, the Energy Advisory Committee's first of three major concerns for Hawai'i listed in their 2005 Functional Plan is the State's over dependency on oil and fossil fuels. The committee also lists these two objectives:

- A) To moderate the growth in energy demand through conservation and energy efficiency.
- B) Displace oil and fossil fuels through alternate and renewable energy resources.

As such, OHA recommends the use of not only photovoltaic cells but also small wind harvesting electrical generation for peripheral uses such as parking lot lighting."

Response: The Applicant will make efforts to support the State's mandate enumerated in Act 95, 2004 Session Laws of Hawai'i for electricity-generating public utilities to produce 20% of their energy through renewable uses by the year 2020.

We also thank OHA for the recommendation regarding small wind harvesting electrical generation. Section 2.8, *Sustainable Building Design* of the EIS will be revised to read as follows:

Sustainability options are being considered for the Ho'opili project. Where feasible, project buildings, activities, and site grounds are intended to be designed

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 21

with energy-saving considerations. Given the natural climate, the project may be suited for the use of renewable energy technologies including photovoltaics. During the public review period, the Office of Hawaiian Affairs wrote: "...OHA recommends the use of not only photovoltaic cells but also small wind harvesting electrical generation for peripheral uses such as parking lot lighting..."

According to the American Wind Energy Association, small wind energy systems typically range from \$3,000 to \$5,000 for every kW (kilowatt) of generating capacity, or about \$40,000 for a 10 kW system (installed). According to the Hawaiian Electric Company (HECO), wind generation energy resources typically cost approximately \$08 to \$ 11/kWh per hour, however these rates apply to larger wind systems (wind farms) as opposed to individual wind systems whose rates are not readily available by HECO.

Photovoltaic (PV) systems range in price from \$8,230 for a one-kW system to more than \$40,000 for a five-kW system. According to HECO, internal estimates for photovoltaic (PV) energy resources typically cost approximately \$.30 to \$.40/kWh per hour.

The average energy consumption by a single-family residence in Hawaii is approximately 600 kWh per hour. According to HECO, "Non-firm sources, such as wind and solar, are called "as-available" resources and must be backed up by firm generation to ensure electricity is available when customers need it -- 24 hours a day, regardless of whether the wind is blowing or the sun is shining."

"In addition to not being available 24-hours-a-day, the variability of wind, typical of the trade winds in Hawaii, can cause power problems. It can affect the quality of power produced. Today, a lot of sensitive electronic equipment can be damaged or disrupted by the variability of power produced from sources like the wind. These fluctuations can also place a big strain on the utility's fossil fuel generators if they have to kick in and meet the demand for electricity when the wind power is suddenly not available."

Even when "as-available" resources are available, HECO still needs to cut back on "as-available" renewable energy sources during off-peak periods of electricity use. This is due to scenarios where customer demand for power drops too low, generation must be turned off to cut back on power production. Otherwise, the electric system could potentially overload and become unstable. Furthermore, fossil-fuel generation can only be reduced so much. This on-and-off cycling could lead to damage and accelerated deterioration of fossil-fuel generators. It also causes the generators to burn more fuel than necessary which leads to an increased cost of electricity.

In June 2008, Governor Lingle signed SB 644 which requires that solar water heaters be required before issuance of a building permit on or after January 2010 for single-family residences.

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 22

In addition, based on the Department of Business, Economic Development & Tourism (DBEDT), Strategic Industries Division's recommendations, Ho'opi'i's mechanical and electrical consultants, in consultation with its sustainability consultant, will be directed to review the City and County of Honolulu's Energy Code early in the project and to consult with Hawaiian Electric Company, Inc. (HECO) on demand-side management programs that offer rebates for installation of energy-efficient technologies.

Office of Hawaiian Affairs Comment: "Solar energy should also be incorporated into the building plans."

Response: In regards to incorporating solar energy into building plans, please note that on page 95 of the Draft EIS it was stated:

The Petitioner is also considering the potential use of photovoltaic cells on future project buildings, where practicable. As an example, large national retailers are entering agreements with micro utility companies who arrange for solar power systems financing and sells such systems to the micro utility company's financing partner. In addition, these micro utilities design, install and maintain these photovoltaic systems per each customer's requirements. The customer pays the financing partner for the solar electricity generated over a long-term power purchase agreement. At the end of the term specified under the agreement, the customer typically has the option to renew the agreement, transfer the equipment to a new site, or purchase the system outright from the financing partner.

Senate Bill 644, SD3, HD3, CD1 was recently passed by the Legislature this session, and proposes to require all new homes built after January 1, 2010 to have solar water heating systems. Should this bill become law, the petitioner intends to comply.

Office of Hawaiian Affairs Comment: "During construction, OHA urges the use of recyclable materials: steel studs and structural members, and wood products from certified sustainable sources."

Response: We thank OHA for its suggestions. Please note that pages 92 and 93 of the DEIS stated:

Recycling shall be encouraged within the project including the reuse and recycling of green waste generated during construction clearing and grubbing activities, the use of recycled construction and demolition wastes and the use of materials made from recycled products, the use of locally produced compost as available for landscaping, and the provision of space for recycling bins in the detailed design of the community. As such, a construction waste recycling plan will be prepared before the start of construction.

LEED

Office of Hawaiian Affairs Comment: "OHA also recommends using the Leadership in Energy and Environmental Design (LEED) Green Building Rating System. This is the nationally accepted benchmark for the design, construction, and operation of high performance green buildings. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. Surface runoff generated by the facility should be stored or re-used for on site needs as part of a design concept attempting to reduce or eliminate any demands on the municipal storm drainage system. These are the types of things that OHA would like to see of a project that seeks to "incorporate green building practices to be an environmentally- sound, healthy and resource-efficient community."

Response: Thank you very much for the information on LEED. Ho'opili is part of the LEED-ND pilot program, and it is in the early stages of working with the U.S. Green Building Council (USGBC) to obtain information required to implement LEED-ND to the extent that it is feasible and practicable.

Landscaping

Office of Hawaiian Affairs Comment: "OHA would like to suggest that the project area be landscaped with the type of groundcover that is comprised of drought tolerant native or indigenous species. Any invasive or aggressive non-native species should also be removed. Doing so would not only serve as practical water-saving landscaping practices and pollution filters, but also serve to further the traditional Hawaiian concept of mālama 'āina and create a more Hawaiian sense of place."

Response: We thank OHA for the suggestion. As noted on page 37 of the Draft EIS:

Native and indigenous vegetation will be considered in the selection of plant materials when a landscaping master plan is prepared.

Flora

Office of Hawaiian Affairs Comment: "Further, OHA also notes that the biological assessment regarding flora as presented in the DEIS on page 36 is not complete:

Due to access issues that prevented the botanical consultants from surveying the detention parcel that terminates in Pearl Harbor (Parcel D2), the property was observed from a nearby footpath and appears to be dominated by kiawe. (emphasis added)

OHA recognizes that this is the applicant's proposal and, therefore, the applicant's responsibility to fulfill the requirements of an environmental assessment. If access to the property is an issue, (which clearly it is - the Navy has not given permission for the applicant to use this parcel) then the applicant should present an alternative along with the appropriate analysis for that alternative. Under no circumstances should a lack of access or information be used (much less presented in a DEIS) by an applicant as an excuse in an environmental review document. This frustrates the very purpose of the environmental review process which is to provide the public with information regarding all aspects of a proposed undertaking so that informed comments can be given and harmful effects mitigated. In short, OHA cannot perform our constitutional mandate to assess a proposed project for its potential impacts to our beneficiaries nor are we able to make this the best project it can be due to a lack of information."

Response: As noted on page 91 of the Draft EIS, if the outlet is not permitted by the Navy:

The alternative drainage solution if the overflow across Navy property cannot be resolved is to construct retention basins on site holding back the total volume of a 100 year- 24 hour storm. These basins would be located on the southern portion of Parcel C.

Since the alternative involves an area that could be surveyed, the existing biological (flora and fauna) conditions and impacts were described on pages 36-37 and 39-40 of the Draft EIS.

Archaeological

Office of Hawaiian Affairs Comment: "OHA is relieved by the assurances given in the DEIS that should iwi kupuna or Native Hawaiian cultural or traditional deposits be found during ground disturbance, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. However, we are concerned about the details of the preservation plan and archaeological monitoring plan that is being prepared for such a large area with the potential for cultural deposits to be unearthened."

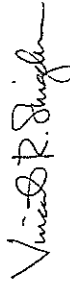
Response: Please be assured that the preservation plan and archaeological monitoring plan are being prepared and will be submitted to the State Historic Preservation Division for their review and comment. Please note that construction is not expected to begin until the necessary governmental approvals are granted.

Mr. Clyde W. Nāmu'ō
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 25

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\Jobs\2502803.01 DR Horton-H Kapolei\EIS\Final HIS Response Letter\981_31 OHA Response.doc



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

April 8, 2008

State of Hawaii Land Use Commission
Attn: Rodney Maille
P.O. Box 2359
Honolulu, Hawaii 96804-2359.

Also sent via E-mail to: rmaile@ldeh.hawaii.gov

RE: Testimony in OPPOSITION to Schuler Homes' Ho'opili Project

The Ho'opili project will displace Aloun Farms and several other farmers who have been successfully farming for several years on prime A and B agriculture land previously owned by Campbell Estate. While Schuler has told the media that the farmers will be relocated, when pressed, it does not appear that Schuler has any guarantee of that. Schuler is simply "inquiring" with other land owners about whether Aloun and the other farmers can be relocated. Sadly, Aloun and the other farmers are bound by "gag clauses" in their leases that prevent them from speaking out against this displacement.

Under our current law, the public can voice its opposition before the Land Use Commission (LUC) and the Planning Commission. The Kapolei Neighborhood Board, Life of the Land, and many others have taken a strong stand against Schuler Homes, calling it a "crime" to evict these farmers from prime agricultural land at a time when Hawaii lawmakers have decryed the fact that our state imports over 90% of our food.

Further, while 30% of these homes are required to be affordable, the buy back provision is only temporary. So in 10 years, we will be faced with the loss of precious farms on prime agricultural land, which will likely be replaced by high priced or luxury homes owned by the wealthy.

I urge the LUC to exercise its mission to serve as a check and balance to the County. It was unacceptable for the County to include this land in its urban growth boundary. Given the speculative real estate pressures on Hawaii's limited lands, there is no reason to expedite the

Representative Maille S.L. Shimabukuro, District 45
(Waialeale-Nāhāhā-Nāhāhā)
Hawaii State Capitol, Room 406, Honolulu, Hawaii 96813
Phone: (808) 586-8460/Fax: (808) 586-8464/E-mail: repshimabukuro@capitol.hawaii.gov
Page 1 of 2

LAND USE COMMISSION
STATE OF HAWAII
2008 APR -8 P 1:40



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

conversion of farmland to market priced and luxury housing, particularly in light of Hawaii's food security and homeless crises.

Please note that I am testifying as an individual, and my views do not necessarily represent those of the Hawaii State Legislature or all of the constituents I represent. My testimony is also supported by Wai'anae Coast residents Karen Young and Rodlyn Brown, as listed below my signature line.

Sincerely,

REP. MAILE SHIMABUKURO, Chair of Human Services and Housing Committee
KAREN YOUNG, Wai'anae Coast resident
RODLYN BROWN, Wai'anae Coast resident



August 11, 2008

WIRANK BRANDELL, ASLA
Chairman

THOMAS WITTLAN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHING, ASLA
Executive Vice-President

VINCENT SUHREKUNJ
Vice-President

GRANT L. MURKASAB, AICP
Principal

TOM SCINTELLA, AICP
Senior Associate

RAYMOND HIGA, ASLA
Senior Associate

KEVIN N. NIHIKAWA, ASLA
Associate

KIMIKAWA YVES, LLDP, AIP
Associate

SCOTT AIUKA, AHRIG
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1000 Ala Moana Blvd., Suite 1450
Honolulu, Hawaii 96813-3184
Tel: (808) 521-5631
Fax: (808) 523-1852
E-mail: info@pbrhawaii.com

HILLO OFFICE
101 August Street
Hilo, Hawaii 96720-2212
Tel: (808) 941-3223
Fax: (808) 941-1889

WAILUKU OFFICE
2707 Wai'oli Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 245-2678

The Honorable Maile Shimabukuro
House of Representatives, 45th District
Hawaii State Capitol, Room 406
415 South Beretania Street
Honolulu, HI 96813

SUBJECT: HO'OPILO DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Representative Shimabukuro:

Thank you for your email dated April 8, 2008. We acknowledge your concern that the proposed project would upon full build-out, displace Aloun Farms and several other farmers.

We appreciate your concerns and the concerns of some of your constituents and office staff. However, the Ewa Plain has long been identified by State and City and County of Honolulu ("City") planning agencies as accommodating projected long-term population growth on O'ahu. The growth of the "Second City" is the stated policy of the City government with a goal of reducing development pressures in Wai'anae, Central O'ahu, North Shore, Ko'olau Loa and Ko'olau Poko. We offer the following responses to your specific comments:

Representative Shimabukuro's Comment: The Ho'opili project will displace Aloun Farms and several other farmers who have been successfully farming for several years on prime A and B agriculture land previously owned by Campbell Estate. While Schuler has told the media that the farmers will be relocated, when pressed, it does not appear that Schuler has any guarantee of that. Schuler is simply "inquiring" with other land owners about whether Aloun and the other farmers can be relocated. Sadly, Aloun and the other farmers are bound by "gag clauses" in their leases that prevent them from speaking out against this displacement.

Response: The Petitioner remains committed to working on the relocation of its largest tenant, Aloun Farm, Inc., consistent with its statement on Page 30 of the Draft EIS. However, to date, no site has been secured for that purpose.

All tenants signed leases with full written notice that the area would be subject to future urbanization given anticipated growth in the region, and relocation was imminent at some point in the future. In consideration for the tenants' eventual need to relocate, the Petitioner has made efforts to assist them in the short-term by keeping lease costs for the land and water at or below market rates. This consideration is also mentioned on Page 30 of the Draft EIS.

Representative Maile S.L. Shimabukuro, District 45
(Wai'anae-Mahele-Aiekuu)
Hawaii State Capitol, Room 406, Honolulu, Hawaii 96813
Phone: (808) 586-8460/Fax: (808) 386-8464/E-mail: repshimabukuro@capitol.hawaii.gov
Page 2 of 2

Representative Shimabukuro's Comment: Under our current law, the public can voice its opposition before the Land Use Commission (LUC) and the Planning Commission. The Kapolei Neighborhood Board, Life of the Land, and many others have taken a strong stand against Schuler Homes, calling it a "crime" to evict these farmers from prime agricultural land at a time when Hawai'i lawmakers have decried the fact that our state imports over 90% of our food.

Response: We concur with the first sentence in the paragraph immediately above. There will be ample opportunities for the public to voice their opposition or support for the project before the Land Use Commission, Planning Commission and City Council. We are not aware that either the Kapolei Neighborhood Board nor Life of the Land have submitted written comments during the DEIS public review period "...against Schuler Homes, calling it a "crime" to evict these farmers from prime agricultural land at a time when Hawai'i lawmakers have decried the fact that our state imports over 90% of our food." We would like to take this opportunity to note that there are a couple of errors in fact:

- 1) No farmers are being evicted. As noted above, all leases issued and agreed to the existing tenants reflected that the area would be subject to future urbanization, and they would have to relocate. In consideration for the tenants' eventual need to relocate, for the petitioner kept land and water costs at or below market rates.
- 2) We take issue with your characterization of the situation as being an eviction and a crime. First, we are not evicting the tenants from their agricultural lands but abiding by the term limits set forth in the leases. These are term limits that were negotiated between the farmers and the landowner and agreed to. However, should legal issues arise if the terms of a lease are not being met or are being violated, we have taken appropriate actions to make sure the violations do not continue.
- 3) Although "...Hawai'i lawmakers have decried the fact that our state imports over 90% of our food[.]" there are various factors that limit the growth of diversified crops in Hawai'i. As the agricultural impact analysis report (Appendix A of the Draft EIS) stated:

"A great many crops can be grown in Hawai'i's year-round subtropical climate, and a number of them can be grown profitably in volumes that require a few hundred acres. However, the modest growth in land requirements for diversified crops reflects the fact that few crops can be grown profitably on a large scale. The primary factors that have limited the growth of diversified agriculture in Hawai'i are given below:

- *Hawai'i's subtropical climate is not well-suited to the commercial production of major crops that grow better in the temperate mainland climates.*
- *For certain crops, special hybrids adapted to Hawai'i's subtropical climate are yet to be developed.*
- *Crop pests are more prevalent and more expensive to control in Hawai'i than they are on the mainland where the cold winters kill many pests.*

- *Fruit-fly infestations prevent exports of many crops, or require expensive treatment.*
- *Most soils in Hawai'i have low nutrient levels and therefore require high expenditures for fertilizer.*
- *Hawai'i suffers from high farm-labor costs, largely because the agriculture industry must compete against the visitor industry and related industries for its labor.*
- *Compared to many other farm areas that supply U.S. markets, the cost of shipping agricultural supplies and equipment to Hawai'i is high, as is the cost of exporting produce from Hawai'i to mainland markets. High shipping costs are a result of Hawai'i's remote location and to Federal regulations that require use of American-built ships and U.S. crews between U.S. ports.*
- *For a number of crops, consumption volumes in Hawai'i are too small to realize support large, efficient farms (i.e., the volumes are too small to realize economies of scale).*
- *On-going trends towards food suppliers purchasing produce that is certified as safe and towards buying from a single supplier of many food items favor large farms.*
- *Hawai'i farmers must compete against highly efficient mainland and foreign farms which, in a number of cases, can deliver produce to Hawai'i more cheaply than it can be produced locally. This is due to economies of scale and, in comparison to Hawai'i, low costs for land, labor, supplies, fertilizer, pest control, equipment, etc."*

Representative Shimabukuro's Comment: Further, while 30% of these homes are required to be affordable, the buy back provision is only temporary. So in 10 years, we will be faced with the loss of precious farms on prime agricultural land, which will likely be replaced by high priced or luxury homes owned by the wealthy.

Response: Your statement reflects the requirements set forth by the City and County of Honolulu in its Rules for the Terms of Unilateral Agreements Requiring Affordable Housing. The Petitioner's intent is to comply with all legal requirements concerning affordable housing, including mandatory restrictions on transfer, sale/buyback and use.

It is quite plausible that the market value of the affordable homes offered in Ho'opi'i could exceed the original purchase price once the mandatory buyback period has expired. However, this potential problem concerns issues related to public policy. Lawmakers at the State or County are better suited to address these concerns rather than the developer.

Representative Maile Shimabukuro
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

Representative Shimabukuro's Comment: I urge the LUC to exercise its mission to serve as a check and balance to the County. It was unacceptable for the County to include this land in its urban growth boundary. Given the speculative real estate pressures on Hawaii's limited lands, there is no reason to expedite the conversion of farmland to market priced and luxury housing, particularly in light of Hawaii's food security and homeless crises.

Response: We acknowledge your comments regarding City's plans (Ewa Development Plan). As an elected State official and an individual, you certainly have the right to convey your wishes to concerning departments and agencies of the State that the City's Ewa Development Plan be completely reversed.

Over the years, a number of communities developed in the 'Ewa region, including the 'Ewa Plantation Villages, the 'Ewa Beach community, and Barbers Point Naval Air Station (now known as Kalaheo). In the 1960's Makakilo City and the James Campbell Industrial Park were started based on an overall master plan for the area prepared by the Estate of James Campbell in the mid-1950's.

'Ewa is a key component of the City and County of Honolulu's directed growth policies. In 1974, Donald Wolbrink of Harland Bartholomew developed a visionary plan for Kapolei. After much public discussion, the decision to direct urban growth to the 'Ewa area became the official policy of the City and County of Honolulu. In 1977, the Honolulu City Council approved a new General Plan that designated 'Ewa as the location for a Secondary Urban Center for O'ahu. The Secondary Urban Center was to be the focus of major economic activity, housing development, and a center for government services, while preserving areas such as Wa'amae and the North Shore for rural uses.

In August 1977, the State Land Use Commission (SLUC) approved the first State Land Use District Boundary Amendment (SLUDBA) in 'Ewa. This SLUDBA permitted the development of West Beach (now referred to as Ko 'Ofina). Subsequent to the Ko 'Olina approval, both the State and the City and County of Honolulu filed at least four petitions with the SLUC to amend the State Land Use Districts in 'Ewa from Agricultural to Urban. In all of the petitions, the General Plan designation of 'Ewa as the Secondary Urban Center was cited as proof that "urbanization" of 'Ewa was consistent with the City and County of Honolulu's planning policy. Similarly, when the Honolulu City Council adopted the *Ewa Development Plan* (DP) in 1997, petitioners cited both the General Plan and the Ewa DP for their respective project's consistency with the City and County of Honolulu's directed growth policy.

In nearly all of the State and County of Honolulu SLUDBA's, soils were rated at or near the top of agricultural productivity rating systems: "A" or "B" by the Land Study Bureau (LSB), and "Prime" under the agricultural lands of importance to the State of Hawaii (ALISH) system. For example, the largest SLUDBA involved 1,300 acres of land adjoining Ho'opi'i in SLUC Docket No. A99-728, also referred to as the Housing and Community Development Corporation of Hawaii (HCDCH) East Kapolei. Ninety-seven percent of the soils in HCDCH East Kapolei were rated "A" or "B" by the LSB, and nearly all of the 1,300 acres were rated "Prime" under ALISH. HCDCH East Kapolei is now under or proposed for development by the University of Hawaii's West O'ahu, the Department of Hawaiian Home Lands, the State

Representative Maile Shimabukuro
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 5

Department of Transportation (North-South Road), the proposed Salvation Army Kroc Center, and the State Department of Land and Natural Resources.

Based on the prior actions undertaken by the state government, we believe that your opposition is contrary to recent developments by State entities in and around the 'Ewa plain. HHFDC, UHWO, DHHL and DOT have all developed former agricultural lands immediately adjacent to the proposed Ho'opi'i project into the Villages of Kapolei, University of Hawaii's - West O'ahu Campus, the Department of Hawaiian Home Lands East Kapolei development and North-South Road. All of these developments also fall within the urban growth boundary.

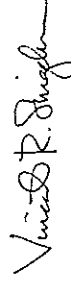
The State appears to maintain its commitment toward growing the Second City in Kapolei by its construction of State office building, and a planned new judiciary complex on former agricultural lands. Finally, during the public review period, the State Department of Land and Natural Resources (DLNR), Engineering Division wrote: "DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opi'i project...The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (H-1 Freeway, Farrington Highway, North-South Road) and the City's proposed transit line as well as the substantial increase development projects in the area."

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\06250293\01 DRI Horton-E Kapolei\HIS\Final EIS\Final EIS Response Letters\B1_26 Shimabukuro Response.doc



HOUSE OF REPRESENTATIVES

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

March 12, 2008

DR Horton- Schuler Division
828 Fort Street Mall, 4th Floor
Honolulu, Hawaii 96813

Contact: Dean Uchida

Dear Applicant,

HOOPILI MASTER PLANNED MIXED USE COMMUNITY

COMMENT ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

As a reminder, I provided testimony on April 9, 2007 regarding the pre-conditions of the Hoopili Project as a development scheme that would upon full build-out, exacerbate the traffic congestion conditions plaguing the Ewa Region and the loss of prime agricultural productive lands.

Many constituents have contacted me regarding the Hoopili Project and want to ensure that in the approval process to reclassify approximately 1,553 acres from an Agricultural District to an Urban District, that such reclassification include the following prerequisites and placed upon the Applicant:

• **THE LEVEL OF SERVICE ON THE H-1 FREEWAY IS ELEVATED FROM ITS CURRENT LEVEL OF SERVICE "F" TO A LEVEL OF SERVICE "A" OR A NEW EXPRESSWAY LINKING WEST OAHU WITH DOWNTOWN HONOLULU IS AVAILABLE**

• **THE EAST WEST CONNECTOR ROAD COMPLETED AND OPEN FOR PUBLIC USE PRIOR TO PERMITTING THE ADDITION OF HOUSING DEVELOPMENT TO OCCUR**

Respectfully,

Rida Cabanilla

Cc: State Land Use Commission/Anthony Ching
PBR Hawaii/Vincent Shigeokuni
Office of Environmental Quality Control

State Representative Rida Cabanilla
State Capitol, Room 442 • Honolulu, Hawaii 96813

Telephone: (808) 586-6080 • Fax: (808) 586-6081 • Email: repcabanilla@capitol.hawaii.gov



August 11, 2008

W FRANK BRANOU, FASLA
Chairman

THOMAS WITTEN, ASLA
President

ILSIAN DUNCAN, ASLA
Executive Vice-President

RUSSELL L CHUNG, FASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANTY MURAKAMI, AICP
Principal

TUMSCINELLA, AICP
Senior Associate

RAYMOND L DUGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMIKAORI YUEN, LEED/PA
Associate

SCOTT ALIHA ABRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

The Honorable Representative Rida Cabanilla
State Capitol, Room 442
Honolulu, Hawaii 96813

SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Representative Cabanilla:

Thank you for your letter dated March 12, 2008, wherein you recommend the following conditions from Ho'opili:

- The level of service on the H-1 Freeway is elevated from its current Level of Service "F" to a Level of Service "A" or a new expressway linking West Oahu with Downtown Honolulu is available.
- The East West Connector Road completed and open for public use prior to permitting the addition of housing development to occur.

We investigated your recommendations. Based on the Traffic Impact Analysis Report (TIAR), Ho'opili, Oahu, Hawaii, prepared by Wilbur Smith Associates, dated February 2008 (Appendix L of the Draft Environmental Impact Statement), the above conditions do not appear to be reasonably related to the need created by Ho'opili nor are the degree of the conditions roughly proportional to the impact on traffic caused by Ho'opili. For this reason, the above conditions go too far and rise to the level of unconstitutional takings under the 5th Amendment Takings Clause of the U.S. Constitution. See, *Nollan v. California Coastal Commission*, 485 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994).

The Petitioner's TIAR analyzes the anticipated impacts of Ho'opili and proposes measures to mitigate the impacts directly caused by Ho'opili under various scenarios. As required by law, the Petitioner will contribute its proportional share of improvements to state and county transportation facilities that are reasonably related to the need created by Ho'opili, as documented by the TIAR.

HONOLULU OFFICE
1081 Bishop Street
5th Floor, Suite 679
Honolulu, Hawaii 96813-5884
Tel: (808) 524-1482
E-mail: ysadmm@pbrhawaii.com

HILO OFFICE
101 August Street
Hilo Logistics Center, Suite 210
Hilo, Hawaii 96720-4252
Tel: (808) 961-3433
Fax: (808) 961-1989

WAIKUKU OFFICE
1727 Wili Iki Loop, Suite 1
Waikuku, Hawaii 96798-1271
Tel: (808) 210-1676

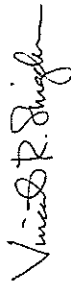
Representative Rida Cabanilla
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kenoloha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

C:\p\6232383.01 DR Horton-E Kapele\EIS\Final EIS\Final EIS Response Letters\BL-07 Cabanilla Response.doc

FAX TRANSMITTAL SHEET

ENVIRONMENTAL CENTER
University of Hawaii
2500 Dole Street, Kaunua Annex 19, Honolulu, HI 96822
Telephone: (808) 956-7361 Fax: (808) 956-3980

DATE: 4/8/2008

FROM: Peter Rappa
Environmental Review Coordinator

TO: Dean Uchida, D.R. Horton (521-6698)
Vincent Shigekuni, PBR Hawaii (523-1402)
Rodney Mail, State of Hawaii, Land Use Commission
(587-3827)
OEQC (586-4186)

SUBJECT: REVIEW OF DRAFT EIS
HO'OPILI PROJECT
EWA, OAHU

No. of Pages: including cover sheet: _____



UNIVERSITY
of HAWAII
MĀNOA

April 8, 2008
EHS: 777

Mr. Dean Uchida
D.R. Horton - Schuler Division
828 Fort Street Mall
Honolulu, HI 96813

Dear Mr. Uchida:

Draft Environmental Impact Statement
Ho'opi'i Project
'Ewa, Oahu

D.R. Horton - Schuler Division proposes the development of Ho'opi'i, a mixed-use, transit-ready community in the 'Ewa district of Oahu. The petition area is located to the south of H-1 Freeway, north of Mango Tree Road, east of the proposed UH-West Oahu, and west of Old Fort Weaver Road. Ho'opi'i is envisioned as consisting of residential units of varying densities (approx. 11,750 units), commercial/business areas, industrial areas, schools, public facilities, transit stops, parks, and large amounts of open space. The proposed development requires the reclassification of approximately 1,554 acres from the Agricultural District to the Urban District. Infrastructure improvements to be improved, expanded, or installed in association with this project include drainage systems, access and circulation roads, water and wastewater collection lines, and electrical/communication systems.

This review was conducted with the assistance of Mark Merlin, Botany; Sharon Ching Williams, Center for Smart Growth and Community Design; and Ryan Riddle, Environmental Center.

General Comments

Ho'opi'i is obviously a well-designed and innovative community - one that offers mitigation measures for many current and projected transportation and housing dilemmas. We are concerned however, about the implications of permanently removing this land from agricultural production. Ho'opi'i is planned for one of the last remaining arable properties on the island of Oahu - a parcel once described as "the golden triangle" by Oahu Sugar Plantation employees. 1,375 acres or about 88% of the petition area is designated as prime agricultural land with good soil, easy access to clean irrigation water, transportation to the market, and ideal solar

2500 Dole Street, Kauai Annex 19 Honolulu, Hawaii 96822
Telephone: (808) 956-7351 Fax: (808) 956-3980
An Equal Opportunity/Affirmative Action Institution

April 8, 2008
Page 2

radiation. Given rising fuel costs, transportation costs, and current economic conditions, it is easy to envision a future in which the State of Hawaii may find this land essential for crop cultivation.

The DEIS concluded that development of this parcel would result in a negligible impact on the growth of diversified agriculture to the state as a whole. The report cited that "the limiting factor to the growth of diversified crops will not be the land supply. Instead, growth will be limited by the size of the market for crops that can be grown profitably in Hawaii" (Appendix pp. ES-14 - ES-15). We contend that very soon, this may not be the case. The size of the market for crops that can be grown profitably in Hawaii will likely grow in proportion to the rapidly increasing costs of importing them.

While Ho'opi'i is planned for a parcel already outlined for development in the 'Ewa Development Plan (EDP), current events appear to necessitate a new assessment of the EDP. We feel that it is prudent to consider the long-term needs of Oahu, and the state as a whole, by protecting Oahu's prime agricultural lands for seen and unforeseen future agricultural use.

Additionally, we would like elaboration on measures that may be implemented to aid the displaced farmers. Some of the farms in the project area have other lands to which they can be moved, but some do not. What will happen to those farms that will lose their land and do not have other places to which they can relocate? Will D.R. Horton attempt to find them other land on which to farm or otherwise compensate them for the loss of land?

In addition to our general comments, we also have several specific comments.

Archaeological and Historical Resources (pp. 41-43)

On page 41 and 42, five historic properties are listed as being within the petition area, however, no map is included. The addition of a map would enable the reader to more clearly envision the distribution of the sites within the petition area.

Operational Noise (pp. 47-48)

The statement on page 47 of the DEIS, "Over the long-term operation of the project, several new noise generating activities (new land uses, additional traffic) which are not currently present, and introduced new residents to ongoing noise generating activities (aircraft noise, future traffic without the project on surrounding roads, transit" is overly long and confusing. This statement should be rewritten to improve readability and comprehension.

April 8, 2008
Page 3

Man-Made Hazards (p. 53)

In the discussion on pesticides, the DEIS states that large areas adjacent to the petition area have been developed for residential use without any apparent ill effects. We wonder, were there no traces of pesticides found, or were pesticides found in adjacent areas simply within acceptable levels?

Thank you for the opportunity to review this Draft EIS.

Sincerely,

John Cusick
John Cusick
Associate Specialist

cc: OEQC
Rodney Maile, State of Hawaii, Land Use Commission
Vincent Shigekami, PBR Hawaii
James Monour, WRRC



August 11, 2008

W FRANK BRANDT, ASLA
Chairman

THOMAS WITTEK, ASLA
President

R STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, FASIA
Executive Vice-President

VINCENT SHIGEKAMI
Vice-President

GRANT MURAKAMI, AICP
Principal

TONY SCINILLI, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMI MUKAMI YUEN, LEED AP
Associate

SCOTT AIKKA, AIBRIG
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
535 Bowler Street, Suite 650
Honolulu, Hawaii 96813-2184
Tel: (808) 521-5631
Fax: (808) 521-1102
E-mail: info@pbrhawaii.com

HILLO OFFICE
101 Aupuni Street
Honolulu, Hawaii 96816-3116
Tel: (808) 963-3223
Fax: (808) 963-3629

WAILUKU OFFICE
1737 Wai Pu Loop, Suite 3
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Mr. John Cusick, Associate Specialist
Environmental Center
University of Hawaii
2500 Dole Street, Krauss Annex 19
Honolulu, Hawaii 96822

SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Cusick:

Thank you for your letter dated April 8, 2008 (your reference number EIS: 777). We thank you for your comments that "Hoopiili is obviously a well-designed and innovative community - one that offers mitigation measures for many current and projected transportation and housing dilemmas." We have reviewed your comments and offer the following responses:

General Comments

Environmental Center Comment: "We are concerned however, about the implications of permanently removing this land from agricultural production. Ho'opiili is planned for one of the last remaining arable properties on the island of Oahu - a parcel once described as "the golden triangle" by Oahu Sugar Plantation employees. 1,375 acres or about 88% of the petition area is designated as prime agricultural land with good soil, easy access to clean irrigation water, transportation to the market, and ideal solar radiation. Given rising fuel costs, transportation costs, and current economic conditions, it is easy to envision a future in which the State of Hawaii may find this land essential for crop cultivation."

Response: According to the agricultural impact analysis report prepared for the Draft EIS ("Hoopiili Impact on Agriculture," Decision Analysis, Inc., February 2008) "...the acreage released from plantation agriculture has far outpaced the demand for land for diversified crops...an estimated 160,000+ acres remain available for diversified crops. Because of the increased availability of agricultural land, a number of landowners report lower per-acre agricultural land rents on Oahu and the Neighbor Islands compared to rents charged before the major contraction in plantation acreage." While we would concur that rising fuel and transportation costs are of concern, it is interesting to note that Mauna Kea Banana Company recently announced it was ending its banana production citing rising fertilizer and energy costs. So the opposite result from what the Environmental Center is anticipating may actually be occurring.

Environmental Center Comment:

"The DEIS concluded that development of this parcel would result in a negligible impact on the growth of diversified agriculture to the state as a whole. The report cited that "the limiting factor to the growth of diversified crops will not be the land supply. Instead, growth will be limited by the size of the market for crops that can be grown profitably in Hawaii" (Appendix pp. ES-14-ES-15). We contend that very soon, this may not be the case. The size of the market for crops can be grown profitably in Hawaii will likely grow in proportion to the rapidly increasing costs of importing them."

Response: While we would concur that the demand for diversified agricultural crops will increase over time, there are various factors that limit the growth of diversified crops in Hawaii. As the agricultural impact analysis report (Appendix A of the Draft EIS) stated:

"A great many crops can be grown in Hawaii's year-round subtropical climate, and a number of them can be grown profitably in volumes that require a few hundred acres. However, the modest growth in land requirements for diversified crops reflects the fact that few crops can be grown profitably on a large scale. The primary factors that have limited the growth of diversified agriculture in Hawaii are given below:

- *Hawaii's subtropical climate is not well-suited to the commercial production of major crops that grow better in the temperate mainland climates.*
- *For certain crops, special hybrids adapted to Hawaii's subtropical climate are yet to be developed.*
- *Crop pests are more prevalent and more expensive to control in Hawaii than they are on the mainland where the cold winters kill many pests.*
- *Fruit-fly infestations prevent exports of many crops, or require expensive treatment.*
- *Most soils in Hawaii have low nutrient levels and therefore require high expenditures for fertilizer.*
- *Hawaii suffers from high farm-labor costs, largely because the agriculture industry must compete against the visitor industry and related industries for its labor.*
- *Compared to many other farm areas that supply U.S. markets, the cost of shipping agricultural supplies and equipment to Hawaii is high, as is the cost of exporting produce from Hawaii to mainland markets. High shipping costs are a result of Hawaii's remote location and to Federal*

regulations that require use of American-built ships and U.S. crews between U.S. ports.

--- *For a number of crops, consumption volumes in Hawaii are too small to support large, efficient farms (i.e., the volumes are too small to realize economies of scale).*

--- *On-going trends towards food suppliers purchasing produce that is certified as safe and towards buying from a single supplier of many food items favor large farms.*

--- *Hawaii farmers must compete against highly efficient mainland and foreign farms which, in a number of cases, can deliver produce to Hawaii more cheaply than it can be produced locally. This is due to economies of scale and, in comparison to Hawaii, low costs for land, labor, supplies, fertilizer, pest control, equipment, etc."*

Environmental Center Comment: "While Ho'opili is planned for a parcel already outlined for development in the Ewa Development Plan (EDP), current events appear to necessitate a new assessment of the EDP. We feel that it is prudent to consider the long-term needs of Oahu, and the state as a whole, by protecting Oahu's prime agricultural lands for seen and unforeseen future agricultural use."

Response: The University of Hawaii's Environmental Center's position is contrary to long established land use policies that were meant to focus development away from country and rural areas such as the North Shore, Waianae, et cetera. Further, such a reversal of public policy is contrary to development efforts undertaken by State agencies such as HHFDC, UHWO, and DHHL developed the adjacent prime agricultural lands into the Villages of Kapolei, University of Hawaii-West O'ahu Campus, and the Department of Hawaiian Home Lands East Kapolei development. The State played and continues to play a significant role in planning and funding for the growth of the Second City in Kapolei (including the State office building and a planned new judiciary complex) on former prime agricultural lands. Major investments in infrastructure and other publicly-funded facilities have contributed to the growth of the Second City. In addition, the City and County of Honolulu is planning on embarking on what may be the largest Capital Improvement Project in the State's history in its Honolulu High-Capacity Transit project which is planned to start in East Kapolei and run through the portion area. As the Environmental Center knows, the transit corridor alignment was selected to serve the greatest number of Honolulu residents and commuters. Finally, during the public review period, the State Department of Land and Natural Resources (DLNR), Engineering Division wrote: "DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opili project... The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (H-1 Freeway, Farrington Highway, North-South Road) and

Mr. John Cusick
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

the City's proposed transit line as well as the substantial increase development projects in the area."

Environmental Center Comment: "Additionally, we would like elaboration on measures that may be implemented to aid the displaced farmers. Some of the farms in the project area have other lands to which they can be moved, but some do not. What will happen to those farms that will lose their land and do not have other places to which they can relocate? Will D.R. Horton attempt to find them other land on which to farm or otherwise compensate them for the loss of land?"

Response: As indicated in the Draft EIS, the Petitioner has been working to assist the tenants in finding a suitable site or sites for relocation. However, to date, no site has been secured for that purpose. Given the planned growth in the region, the leases issued to the existing tenants reflected the fact that the area would be subject to urbanization in the future. The tenants all signed the leases with full knowledge of the circumstances. In order to assist them in the short term consideration for the land and water were kept at or below market rates.

Archaeological and Historical Resources

As requested, the EIS will be revised to include a new Figure 4.1 showing the locations of the five historic sites mentioned.

Operational Noise

Thank you very much for noting the missing text. This paragraph (the sixth paragraph of Section 4.3 Noise) will be revised in the Final EIS to read as follows:

Over the long-term operation of the project, several new noise generating activities (such as new land uses, additional traffic) will be introduced, which are not currently present; and introduced new residents to ongoing noise generating activities (such as aircraft noise, future traffic without the project on surrounding roads, transit).

Man-Made Hazards

The Petitioner has been coordinating with the State Department of Health (DOH) Hazard Evaluation & Emergency Response Office (HEER). Based on recent correspondence from HEER, the last two paragraphs in Section 4.5 Man-Made Hazards, Anticipated Impacts and Mitigation Measures of the EIS will be revised to read as follows:

Mr. John Cusick
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 5

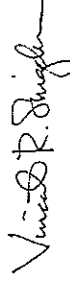
On March 13, 2008, in an interdepartmental memorandum from the DOH Hazard Evaluation & Emergency Response Office (HEER) to the DOH Environmental Planning Office, HEER wrote: "The land under consideration for development of the Ho'opili Project mixed residential/commercial community was formerly used to grow sugar cane. The Draft EIS acknowledges the presence of potential contamination, and investigative work is being coordinated with the HEER Office." The Petitioner is working with DOH on a sampling methodology to determine the presence and levels of certain pesticides. Subsequent actions will be based on the results of the sampling.

Based on sampling done on the adjacent DHHL property, no impacts from pesticide use on the former sugar cane cultivation of the Petition Area are anticipated. Since the Ewa Plain was once mostly under sugar cultivation and large areas have subsequently been developed for residential use without any apparent ill effects, it is anticipated that future residents in the Petition Area will not be exposed to unacceptable levels of pesticides from past or present agricultural activities. During the public review period, the HEER recommended that soils be tested for residual pesticide contamination and that the presence of potential hazards be evaluated. The scope of the investigative work is currently being coordinated with the HEER Office to ensure that the study will be carried out in the most efficient and effective manner possible.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigeekuni
Vice President

encl: Figure 4.1: Archaeological Sites

cc: Ms. Katherine P. Kenloha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission



April 8, 2008

Vincent Shigekuni, Vice President
 PBR HAWAII
 ASB Tower, Suite 650
 1001 Bishop Street
 Honolulu, HI 96813

Dear Mr. Shigekuni:

SUBJECT: Draft Environmental Impact Statement – Ho'opili
 'Ewa, O'ahu, Hawaii, Tax Map Key 9-1-17: 04 (por), 59, and 72; 9-1-18: 01 and 04.

Thank you for your letter dated February 20, 2008 requesting the University to review and comment on the Draft Environmental Impact Statement (DEIS) to reclassify approximately 1,563,844 acres of land in 'Ewa for the proposed Ho'opili development.

As the land owner of the 500 acre site located west of the proposed development, the University supports approval of D.R. Horton's Ho'opili DEIS. UH West O'ahu has long been a supporter of Kapolei as O'ahu's planned second city. Allowing 'Ewa Plain residents the opportunity to live, work, play and study within Kapolei will allow the vision of a second city to become reality.

As the Chancellor of UH West O'ahu, I was invited to be a member of D.R. Horton's community task force that provided recommendations in the planning phase of the Ho'opili development. In addition, UH West O'ahu and D.R. Horton participate in ongoing meetings with the 'East Kapolei Developers Group' to coordinate roadways, traffic concerns, infrastructure and to keep everyone abreast of the progress in the area. Through this group, things such as creation of a coordinated master bike plan and road way circulation plan was created.

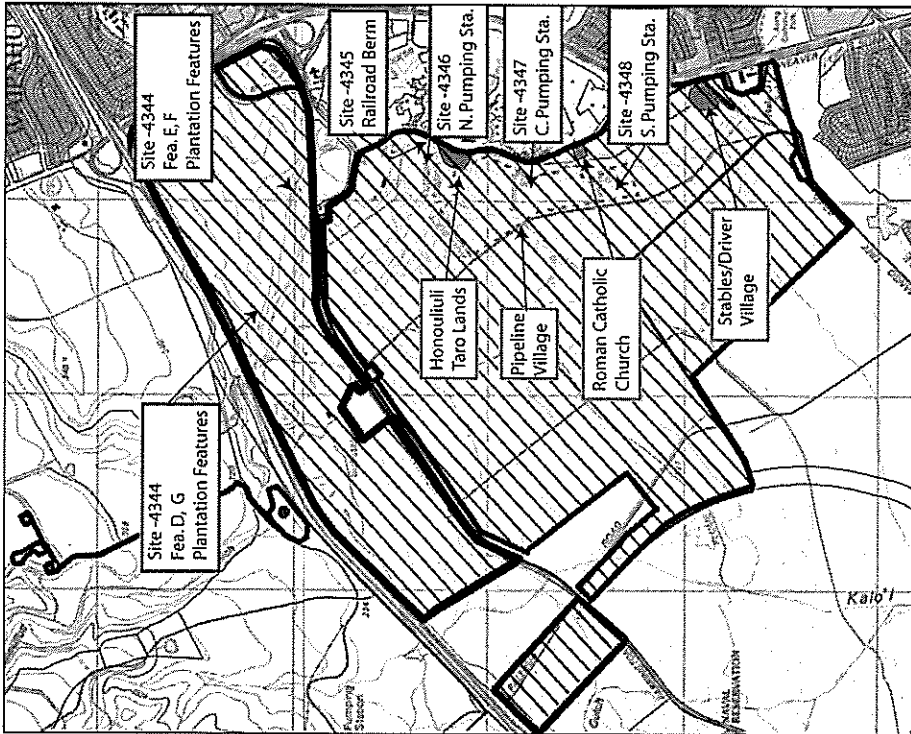
Ongoing discussion and coordination is needed with regional landowners to address issues such as infrastructure, transit, roadways, etc., and we expect D.R. Horton will continue to work collaboratively with us to ensure success for the region.

Again, we support D.R. Horton's DEIS and look forward to working together with them for many years to come. Should you have any questions, please feel free to contact Mr. Allan Ah San, Project Manager, at 692-0918.

Regards,

Gene L. Awakuni
 Gene L. Awakuni
 Chancellor

C: Rodney Maile, SLUC Acting Director
 Sam Callejo, Vice President, UH System



LEGEND
 Petition Area

Figure 4.1: Historical Sites
HO'OPIILI
 O'ahu, Hawaii

Not to Scale

Source: Cultural Survey of Hawaii
 Disclaimer: This graphic has been prepared for general planning purposes only.



August 11, 2008

W FRANK IRANDELL ASLA
Chairman

THOMAS WILKINS ASLA
President

R STANUSKAN ASLA
Executive Vice-President

RUSSELL J CHUNGS FASIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T MURAKAMI AICP
Principal

TOM SCHINELL AICP
Senior Associate

KAY MONTE WIGHA ASLA
Senior Associate

KENIN K NISHIKAWA ASLA
Associate

KIMI MIKAMI YUEN, ILLD AP
Associate

SCOTT TALIMA ALBINGO
Associate

SCOTT MURAKAMI ASLA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813-3981
Tel: (808) 521-5631
Fax: (808) 523-3102
E-mail: syed@pbrhawaii.com

HIO OFFICE
101 Aieaonua Street
Palo Lagoon Center, Suite 310
Palo, Hawaii 96790-4262
Tel: (808) 961-3353
Fax: (808) 961-7589

WAILING OFFICE
175 Wilia Loop, Suite 4
Wailuku, Hawaii 96793-1751
Tel: (808) 242-2626



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850



In Reply Refer To:
2008-TA-0127

Mr. Vincent Shigekuni
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Subject: Draft Environmental Impact Statement for Proposed Hoopi'i Development Ewa,
Oahu, Hawaii

Dear Mr. Shigekuni:

The U.S. Fish and Wildlife Service has reviewed the draft Environmental Impact Statement (DEIS) for the Hoopi'i proposed mixed-use community development (proposed project) located in Ewa on the island of Oahu. These comments are provided in accordance with the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.; 87 Stat. 884), as amended (ESA); and other authorities mandating Federal oversight of natural resources including the Migratory Bird Treaty Act (16 U.S.C. 703 et seq.) (MBTA).

The proposed project will rezone 1,554 acres of land from agriculture district to urban district. The overall goal of the proposed project is to develop 1,600 acres into a mixed-use development with residential, business, and associated infrastructure. The proposal includes development of a Makai settling basin [(D1) TMK 9-1-010:002] with an outlet [(D2) 9-1-010-014 and 015 (por.)], that will drain through U.S. Navy land adjacent to the U.S. Fish and Wildlife Service National Wildlife Refuge [(NWR) Pearl Harbor NWR -- Honolulu unit]. The Honolulu unit was established for the recovery of the federally endangered Hawaiian stilt (*Himantopus mexicanus knudseni*) and it also supports the federally endangered Hawaiian moorhen (*Gallinula chloropus sandvicensis*), Hawaiian coot (*Fulica alai*), and Hawaiian duck (*Anas wyvilliana*) as well as populations of migratory waterfowl and shorebirds protected under the MBTA.

We are concerned the DEIS does not adequately address potential adverse effects to federally protected bird species. The proposed project could act as a nuisance attractant for listed waterbirds specifically as it relates to the settling basin areas D1 and D2. Uncovered, open water attracts migratory and listed waterbirds to areas they would normally avoid. This type of attraction may result in increased predation pressure from non-native predators such as mongoose, rats, feral dogs and cats. There are feral cats and documented cat feeding stations near the Honolulu unit and the proposed Makai settling basin and outlet. Attraction to the

SUBJECT: HO'OPII DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Chancellor Awakuni:

Thank you for your letter dated April 8, 2008. We have reviewed your letter and offer the following responses to your comments.

- 1. Thank you for your support of the Ho'opi'i project.
- 2. The Petitioner acknowledges that ongoing discussion and coordination is needed with regional landowners to address issues such as infrastructure, transit, roadways, etc., and will continue to work collaboratively with the University of Hawaii' - West O'ahu to ensure success for the 'Ewa region.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Keaioha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\hubs\592593.01 DR_Hoopii-B_Kapolei\DEIS\Final EIS Response Letters\BL-29 UHWO Response.doc





August 11, 2008

Mr. Patrick Leonard, Field Supervisor
United States Department of the Interior
Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850

Attn: Mr. Aaron Nadig

SUBJECT: HO'OPIHI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Leonard:

Thank you for your letter dated April 8, 2008 (your reference number 2008-TA-0127). We greatly appreciate the information provided in your letter. Please be assured that the potential outlet to Pearl Harbor is still considered an unresolved issue as the Navy has yet to reply to our proposal.

In response to the Service's comments regarding the potential that the proposed action may result in impacts to listed waterbird species, the last two paragraphs of Section 3.8 *Fauna, Anticipated Impacts and Mitigation Measures* of the EIS will be revised to read as follows:

The notable exceptions to the above are the four endangered waterbird species which currently inhabit the National Wildlife Refuge located north of Parcels D1 and D2. These birds may utilize the proposed detention basin if sufficient water collects to allow ponding. There may be periodic disturbance to the waterbird species if temporary construction occurs within the proposed detention basin (to enlarge it) or if an outlet is allowed. As previously noted, the waterbirds breed in the Honolulu Unit of the National Wildlife Refuge, less than a sixth of a mile (250 meters) north of Parcels D1 and D2. While the proposed detention basin is located near the Refuge, there is no suitable habitat for these waterbirds in Parcels D1 and D2. According to Bills Engineering, the project civil engineer, the proposed mckai drainage will rarely contain standing water.

W FRANK BRANDOLI, ASLA
Chairman

THOMAS WITTEN, ASLA
President

K STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHONG, ASIA
Executive Vice-President

VINCENT SHERKIN
Vice-President

GRANT LACROIX, ASLA
Principal

TOM SCHILLACK
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN S. SNIHOKAWA, ASLA
Associate

KUMIKAWA YUEN, LL.D., P.E.
Associate

SCOTT AIUKA AHRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

MONOLLO OFFICE
1081 Baker Street
533 Tower, Suite 650
Honolulu, Hawaii 96813-7184
Tel: (808) 521-5631
Fax: (808) 521-1103
E-mail: opm@pbrhawaii.com

HLO OFFICE
1001 Kalia Road, Suite 310
Honolulu, Hawaii 96813-3202
Tel: (808) 963-3223
Fax: (808) 963-1593

WAILUKU OFFICE
4737 W. W. P. Loop, Suite 2
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Mr. Vincent Shigekuni

settling basin could lead to increased waterbird predation resulting in failed nesting attempts and adult bird mortality.

Therefore, we recommend coordination with our office to develop avoidance and minimization measures for the federally listed species that may be attracted to the open water settling basin in the proposed project. The project as currently proposed, with the use of the Makai settling basin and outlet, may require consultation pursuant to section 7 of the ESA. Section 7 requires Federal agencies to insure that any action authorized, funded or carried out by them is not likely to jeopardize the continued existence of listed species or adversely modify or destroy their critical habitat. The Federal nexus may be the U.S. Navy since their land may be involved in the proposed project.

If there is no Federal nexus, then private landowners, corporations, state or local governments, or other non-Federal landowners who wish to conduct activities on their land that might incidentally harm (or "take") wildlife federally listed as endangered or threatened must first obtain an incidental take permit from the U.S. Fish and Wildlife Service. An incidental take permit allows a property owner to conduct otherwise lawful activities in the presence of listed species. A non-Federal entity develops a Habitat Conservation Plan (HCP) in order to apply for an incidental take permit under section 10(a)(1)(B) of the ESA. The HCP integrates the applicant's proposed project or activity with the needs of the species. It describes, among other things, the anticipated effect of a proposed taking on the affected species and how that take will be minimized and mitigated. Such information must be submitted with any incidental take permit application.

We are available to assist you in developing appropriate minimization and avoidance measures for listed waterbirds. If you have questions regarding these comments, please contact Aaron Nadig of my staff (phone: 808-792-9400, fax: 808-792-9581).

Sincerely,

Patrick Leonard
Field Supervisor

cc:
Rodney Maille, State of Hawaii Land Use Commission
Sylvia Pelizza, Oahu National Wildlife Refuge Complex

Mr. Patrick Leonard
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

At the present time there is no federal nexus associated with this project, because it does not appear that the U.S. Navy will permit access or grant an easement for an outlet from the proposed makai drainage retention basin. If and when this component of the proposed development moves forward, the Petitioner will consult with both the U.S. Fish and Wildlife Service and the State of Hawai'i Division of Forestry and Wildlife to ensure that the construction and operation of the detention basin does not result in deleterious impacts to any species currently listed as endangered, threatened or proposed for listing under either federal or State of Hawai'i endangered species statutes.

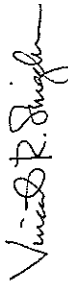
Otherwise, impacts to the other existing alien mammalian and avian species and their habitats are expected to be minimal. Disturbance and displacement of individual alien species is likely to occur as construction and development infill takes place. The disturbance will be of a temporary nature.

The results of the antitropod survey at the Petition Area (See Appendix R) indicate that there are no special concerns or legal constraints related to invertebrate resources in the Petition Area. No invertebrate species listed as endangered, threatened or that are currently proposed for listing under either federal or State of Hawai'i endangered species statutes are known to exist on the project site.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Keatlohai, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\604232\503.01 DR Horton-E Kopye\EIS\Final EIS\Final EIS Response Letters\BL_20 USFWS Response.doc

BOARD OF WATER SUPPLY

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



March 6, 2008

MUF HANSELMANN, Mayor
RANDALL Y. S. CHING, Chairman
ALLY J. PARK, Vice
ROBERT C. CUNDIFF
JAMIC C. TILKER

CRAG I. NISHIMURA, Executive Director
BRENNON T. MORIOKA, Executive Director
CUFFORD P. LUU
Manager and O&M Engineer

DEAN A. MUKANO
Deputy Manager and Chief Engineer

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Your Letter of February 20, 2008 on the Draft Environmental Impact Statement (DEIS) for Ho'opili, TMK: 9-1-17-4,59,72; 9-1-18-1,4; 9-1-10-2,14,15; 9-1-17-4; 9-2-1,4, 5, 6, 7, 9-2-2,2

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

We have the following comments to offer:

1. A potable and non-potable water master plan of the entire development should be submitted for our review and approval. The master plan should include the water requirements and proposed infrastructure facilities. The master plan should show that the facilities are able to provide water service and fire protection in accordance with our Water System Standards.
2. The developer will be required to install the necessary water system improvements to serve the proposed development. The construction drawings should also be submitted for our review and approval.
3. Board of Water Supply (BWS) Rules and Regulations require the use of non-potable water for the irrigation of large landscaped areas if a suitable supply is available. The developer should look into the feasibility of serving the large landscaped areas within the development with non-potable water. If the use of non-potable water is not feasible or not available, a report of the findings should be submitted before we allow the use of potable water for irrigation of large landscaped areas. The developer should contact our Water Resources Division at 748-5900 for the availability of recycled water and other non-potable water supplies.



August 11, 2008

WEI HAN BRUNDT, ASIA
Client

THOMAS WITLEN, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL CHUNG, ASIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT MURAKAMI, AEP
Principal

TOM SCHINELLAI, AICP
Senior Associate

RAYMOND T. HIGA, ASIA
Senior Associate

KEVIN K. NISHIKAWA, ASIA
Associate

KIMIHIKARI YUEN, LEED AP
Associate

SCOTT AIUKA, ABBRIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 1050
Honolulu, Hawaii 96813-2484
Tel: (808) 521-5631
Fax: (808) 523-1902
E-mail: info@pbrhawaii.com

HILLO OFFICE
101 August Street
Suite 310
Hilo, Hawaii 96720-2322
Tel: (808) 961-3223
Fax: (808) 961-1889

WAIKUKU OFFICE
1297 Waihi Dr., Loop, Suite 4
Waikuku, Hawaii 96793-1271
Tel: (808) 242-2678

Mr. Vincent Shigekuni
March 6, 2008
Page 2

4. We recommend the use of drought tolerant/low water use plants and possible xeriscaping principles for all landscaping. We also recommend the installation of an efficient irrigation system, possibly using drip irrigation. The irrigation system should incorporate moisture sensors to avoid the operation of the system in the rain and if the ground has adequate moisture.

5. The developer should also consider rain barrel catchments, water-efficient front-load washer appliances and ultra low-flow toilets.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,

KEITH S. SHIDA
Program Administrator
Customer Care Division

Mr. Keith S. Shida, Program Administrator
Customer Care Division
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 'i 96843
Attn: Mr. Robert Chun

SUBJECT: HO'OPIHI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Shida:

Thank you for your letter dated March 6, 2008. We have reviewed your letter and offer the following response to your comments.

1. A conceptual water master plan was prepared and reproduced in its entirety in the Draft EIS Volume II as Appendix M. The water master plan included the Project's water requirements and proposed infrastructure facilities. The water master plan indicated that with the construction of the necessary improvements, the facilities are able to provide water service and fire protection in accordance with the Board of Water Supply's (BWS) Water System Standards.
2. We acknowledge that the Petitioner will be required to install the necessary water system improvements to serve the proposed development. As noted on page 86 of the Draft EIS: "New water system demands will require that the Petitioner provide system upgrades to the transmission and storage components to ensure that the system operates effectively and meets BWS standards."
Also, as noted on page 87 of the Draft EIS, construction drawings will be submitted to BWS for its review and approval.
3. We acknowledge that BWS Rules and Regulations require the use of non-potable water for the irrigation of large landscaped areas if a suitable supply is available. A conceptual water master plan that was prepared and reproduced in its entirety in the Draft EIS Volume II as Appendix M assumed dual potable and non-potable water demand and system. As noted on page 87 of the Draft EIS, it is proposed that the project's greenbelts, parks and roadway medians use non-potable water for irrigation, if a suitable supply will be available. Per the BWS comments, the last paragraph in Section 4.8.2, *Water Supply Facilities, Anticipated Impacts and Mitigative Measures* of the Final EIS will be revised to read as follows:

Mr. Keith S. Shida
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Mr. Keith S. Shida
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 3

The project will be maximizing the use of non-potable water for irrigation to minimize the impact on the source component of the BWS system. It is proposed that the project's greenbelts, parks and roadway medians use non-potable water for irrigation, if a suitable supply will be available. The BWS Water Resources Division will be contacted regarding the availability of recycled water and other non-potable water supplies. A Conceptual Water Master Plan addressing safe drinking and non-potable water facilities has been prepared and reproduced in its entirety and attached to this EIS as Appendix M will be submitted to BWS for its review and approval. In addition, construction drawings will be submitted to BWS for its review and approval. During the public review period of the Draft EIS, the DLNR Commission on Water Resource Management requested that "the reuse of storm water and installation of water efficient fixtures be considered" and recommended "the use of xeriscaping and the planting of drought tolerant and self-tolerant plants to conserve water supplies."

4. Per the BWS comments, the third to the last paragraph in Section 4.8.2, Water Supply Facilities, Anticipated Impacts and Mitigative Measures of the Final EIS will be revised to read as follows:

With respect to non-potable water requirements, the project will be maximizing non-drinking usage to minimize the demand on the safe drinking water system. If a suitable supply is made available, Street right of ways of the Ho'opi'i project will have underground non-drinking distribution systems. It is proposed to upgrade the existing non-drinking source (EP 5 & 6 located within Parcel C) to a BWS dedicable standard to be used as the source for the non-drinking system. It is also proposed to ultimately allow for future dedication of the non-drinking system. It is estimated that the ultimate non-drinking demand for the project will be approximately 2.1 MGD. The Petitioner will consider the use of drought tolerant/low water use plants and the implementation of xeriscaping principles for landscaping within the Ho'opi'i project to the extent practicable. The installation of an efficient irrigation system, possibly using drip irrigation, will be considered in the design of the project where feasible. Motion sensors to avoid the operation of the system in the rain and if the ground has adequate moisture would be incorporated into the irrigation system, where feasible.

5. Thank you for your comments regarding smart water consumption. The Petitioner will consider the implementation of rain barrel catchments, water-efficient frontload washer appliances and ultra low-flow toilets, as appropriate. Per the BWS comments, the first paragraph in Section 4.8.2, Water Supply Facilities, Anticipated Impacts and Mitigative Measures of the Final EIS will be revised to read as follows:

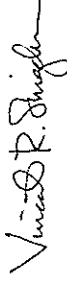
The total average daily source requirement for ultimate build-out is estimated at 3.9 MGD. The future water demand from the proposed project is based on standard civil engineering methodology; it is possible that with the implementation of feasible water conservation appliances, future water demand from the project may be lessened. During the public review period, the BWS wrote: "The developer should also consider rain barrel catchments, water-efficient front-load washer appliances and ultra low-flow toilets." It is intended that source (well supply) would be provided by BWS from existing sources. Although BWS cannot reserve water for future projects, it has indicated that there is water available to meet the estimated water demand for the project (3.9 MGD). Water Facility Charges paid by the Petitioner will be used by the Board to assist in the source replenishment caused by the project's water demands.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU

715 SOUTH KING STREET, SUITE 311 • HONOLULU, HAWAII 96813 • AREA CODE 808 • PHONE 735-7162 • FAX 735-7182



MUFI HANNEMANN
MAYOR

DEBORAH KIM MORIKAWA
DIRECTOR
BRISTY L. MARTIN
DEPUTY DIRECTOR

March 6, 2008

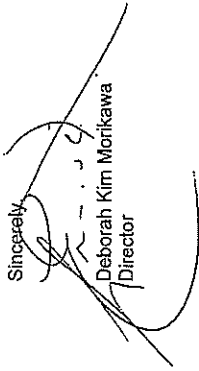
Mr. Vincent Shigekuni, Vice President
PBR HAWAII
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Response to Draft Environmental Impact Statement
Ho'opili Project

Thank you for providing us with the opportunity to review and comment on the Ho'opili Draft Environmental Impact Statement (DEIS). Prior to development, we understand that you will coordinate details of the affordable housing program in the Ho'opili project that pertain to regulations and programs of the City and County of Honolulu.

The Department of Community Services appreciates your consideration of these comments, and looks forward to reviewing the final EIS when it becomes available. Questions regarding this matter may be directed to Mr. Randy Wong at 768-7747.

Sincerely,

Deborah Kim Morikawa
Director

DKM:rg

cc: Rodney Maille, Acting Director,
State of Hawaii, Land Use Commission



August 11, 2008

W. FRANK BRANDI, ASLA
Chairman

THOMAS W. WHITEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

ROSSELL M. CHONG, FASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT E. MURAKAMI, AICP
Principal

TOM SCHNITTLER, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIM L. HARRIS, LEED AP
Associate

SCOTT A. BURROUGHS
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813-2184
Tel: (808) 521-5641
Fax: (808) 521-1100
E-mail: spinning@pbrhawaii.com

HILO OFFICE
1411 Puunani Street
Honolulu, Hawaii, Suite 110
Hilo, Hawaii 96720-8203
Tel: (808) 961-3233
Fax: (808) 961-3689

WAILUKU OFFICE
1747 Waihi Rd. Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

Ms. Deborah Kim Morikawa, Director
Department of Community Services
City and County of Honolulu
715 South King Street, Suite 311
Honolulu, Hawaii 96813

Attn: Mr. Randy Wong

SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Morikawa:

Thank you for your letter dated March 6, 2008. We have reviewed your letter and offer the following response to your comments.

We concur that the details of the affordable housing program in the Ho'opili project that pertain to the regulations and programs of the City and County of Honolulu (County) will be coordinated with the County prior to development.

The fourth paragraph of Section 4.7.3 *Housing, Anticipated Impacts and Mitigative Measures* of the EIS will be revised as follows.

The proposed housing will be in neighborhoods that integrate low- and medium-density or medium- and high-density residential areas. As a result, Ho'opili will cater to a range of income levels. In accordance with the City and County of Honolulu's affordable housing guidelines, up to 30 percent of the total number of units are expected to be developed as affordable housing units. Details of the affordable housing program in the Ho'opili project that pertain to the regulations and programs of the City and County of Honolulu will be coordinated with the County prior to development.

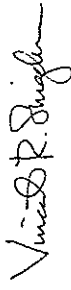
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

Ms. Deborah Kim Morikawa
SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\66152\252503.01 DR Heron-E Kapele\EIS\Final EIS\Final EIS Response Letters\BL-04 DCS Response.doc

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU
1000 Uukoua Street, Suite 215, Kapele, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3351
Website: www.honolulu.gov



MUFI HANNEIMANN
MAYOR

CRANG I. NISHIMURA, P.E.
DIRECTOR AND CHIEF ENGINEER
GEORGE S. KAWAYO
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 05-282

April 7, 2008

Mr. Vincent Shigekuni
PBR Hawaii
1001 Bishop Street
ASB Tower, Suite 650
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Draft Environmental Impact Statement (DEIS), Hoopiil

Thank you for the opportunity to review and comment on the DEIS dated February 2008, for the proposed Hoopiil development.

Although not identified in the DEIS, it is our understanding that the project bikeways and walkways not located within roadways to be dedicated to the City will be privately-owned and maintained.

Furthermore, the DEIS does not indicate maintenance jurisdiction of the storm drainage detention and retention basins. These basins shall not be maintained by the City and shall be privately-owned and maintained.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3687.

Sincerely,



Charles T. Nishimura, P.E.
Director and Chief Engineer

c: State of Hawaii-Land Use Commission



August 11, 2008

WENDY BRANTZ-PASLA
Chairman

HUGHSS WYTIEN, ASIA
President

R. STAN BUNGAN, ASIA
Executive Vice-President

RUSSELL CHUNG-PASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MUKAKAMI, AIEP
Principal

TOM SCINIELLA, AICP
Senior Associate

RAYMOND THIGA, ASIA
Senior Associate

MYUNG K. NISHIKAWA, ASIA
Associate

KIMI MIKASAMI-YUEN, LEED AP
Associate

SCOTT MALINA-ABRIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE

101 Bishop Street
ASB Tower, Suite 600
Honolulu, Hawaii 96813-3461
Tel: (808) 531-5431
Fax: (808) 531-5432
E-mail: syademi@pbrhawaii.com

HILO OFFICE

101 Aupuni Street
Hilo Lagoon Center, Suite 210
Hilo, Hawaii 96720-4362
Tel: (808) 935-3333
Fax: (808) 961-4999

WAILUKU OFFICE

Wailuku Office
Wailuku, Hawaii 96791-1711
Tel: (808) 342-2878

Mr. Craig I. Nishimura
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

The project will increase impervious surfaces such as roadways, roofs, paved parking areas, and sidewalks. These surfaces will cause an increase in storm water discharge within the Petition Area. However, detention basins and/or retention basins are being planned and sited to detain and/or retain storm water to ensure that areas downstream of the project are not impacted. Based on comments received from the City and County of Honolulu Department of Facilities Management during the public review period, storm drainage detention and retention basins within the project site shall be privately-owned and maintained, unless particular parcels of land are dedicated to or acquired by the government. During the public review period, the State Office of Planning requested a discussion of low impact development techniques that can be incorporated into the building and site design to improve stormwater management. Table 1.1 of Low Impact Development: A Practitioner's Guide (2006) lists specific Low Impact Development (LID) best management practices (BMP's) and techniques.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\06\0525203.01 DR Honoré Kapolei\NEIS\Final EIS\Final EIS Response Letters\BL-21 DPM Response.doc

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Nishimura:

Thank you for your letter dated April 7, 2008. We concur that project bikeways and walkways not located within road rights-of-ways dedicated to the government will be privately-owned and maintained. Based on your comments, the third to the last paragraph of Section 4.9.5, *Recreational Facilities* of the EIS will be revised to read:

Open space buffers are proposed to be located along the H-1 Freeway and Old Fort Weaver Road. In addition, linear parks and open space will encircle the Ho'opi'i project with walking/biking paths. "Mini" parks located throughout the project will be within walking distance of most residences. A regional bikeway plan has been developed in cooperation with UHWO, DHHL and HCDA. Figure 4.3: East Kapolei Regional Bikeway Plan shows the approximate alignment of bikeways being proposed by DHHL, UHWO and the Petitioner and how they may connect to bikeways proposed by others (such as HCDA), the bike path shown on the Ewa DP Public Facilities Map, the bikeways shown on the State Bicycle Plan 2003, and park sites proposed by HCDA, DHHL, UHWO and the Petitioner, and possible transit stops (locations being finalized as of this writing). Based on comments received from the City and County of Honolulu Department of Facilities Management during the public review period, project bikeways and walkways not located within road rights-of-ways dedicated to the government will be privately-owned and maintained.

We also concur that storm drainage detention and retention basins within the project site shall be privately-owned and maintained, unless particular parcels of land are dedicated to or acquired by the government. Based on your comments, the second to the last paragraph of Section 4.8.4, *Drainage Facilities* of the Draft EIS will be revised to read:

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
KAPOLEI HALE, 1000 ULUOHA STREET, STE. 309 • KAPOLEI, HAWAII 96707
Phone: (808) 768-3003 • FAX: 768-3053 • Internet: www.hawaii.gov



MAUI HANSMANN
MAYOR

LESTER K. C. CHANG
DIRECTOR
GAIL Y. HARAGUCHI
DEPUTY DIRECTOR

March 7, 2008

Mr. Vincent Shigeekuni, Vice President
PBR HAWAII
ASE Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigeekuni:

Subject: Draft Environmental Impact Statement-Hoopili Project

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for D. R. Horton's proposed Hoopili project.

The Department of Parks and Recreation has no comment. As proposed in the draft EIS we look forward to meeting with the developer at an early stage in the development's planning process to develop a conceptual plan for overall park development which is acceptable and appropriate.

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

LKCC:jr
(249865)

cc: Rodney Maile, Acting Director, State of Hawaii Land Use Commission

w/PBR



August 11, 2008

W. FRANK BRANSDT, IAMA
Chairman

THOMAS WITTEN, ASLA
President

R. STANLEY CANAN, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURKAKAMI, AICP
Principal

TOM SCHINTELL, AICP
Senior Associate

KAYMOND J. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMIKAWA YUEN, ILLD/PA
Associate

SCOTT ALUKAABIRIGO
Associate

SCOTT MURKAKAMI, ASLA
Associate

HONOLULU OFFICE
1681 Bishop Street
ASE Tower, Suite 650
Honolulu, Hawaii 96813-2184
Tel: (808) 251-5811
Fax: (808) 251-1922
E-mail: info@pbrhawaii.com

HILO OFFICE
1001 Bishop Street
Hilo, Hawaii 96725-2262
Tel: (808) 961-3233
Fax: (808) 961-4837

WAILUKU OFFICE
1737 Waikeala Drive, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2675

Mr. Lester K. C. Chang, Director
Department of Parks and Recreation
City and County of Honolulu
Kapolei Hale
1000 Uluoaha Street, Suite 309
Kapolei, Hawaii 96707

Attn: Mr. John Reid

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Chang:

Thank you for your letter dated March 7, 2008. We acknowledge that the Department of Parks and Recreation has no comments to offer at this time. We thank you for meeting with us on April 22, 2008. We greatly appreciated you sharing your vision for how the region's recreational needs would be met and how the proposed project will play its role in this vision. The Petitioner assures you that it will continue to coordinate with your Department to develop a conceptual plan for overall park development which is acceptable and appropriate.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigeekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\Noi\252503.01 DR Horton-E Kapolei\EIS\Final EIS Response Letters\BL-01 DWR Response.doc

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 788-9000 • FAX: (808) 523-6743
INTERNET: www.honolulu.gov • DEPT. WEB SITE: www.honolulu.gov



MUPT HANNEKAMM
MAYOR

HENRY ENG, FAJPC
DIRECTOR

DAVID K. HARBOE
PLANNING DIRECTOR

2007/GEN-8 (TH)

April 7, 2008

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Subject: Draft Environmental Impact Statement for Ho'opi'i, Ewa, Oahu,
Tax Map Keys: 9-1-017:004 (portion), 059, and 072; 9-1-018:001 and 004;
9-1-010:002, 014 (portion), and 015 (portion); and 9-2-002:002; and
9-2-001: 004, 005, 006, and 007

We have reviewed the subject Draft Environmental Impact Statement (DEIS) and offer the following comments.

1. Any anticipated increases in surface runoff should be mitigated through the use of retention basins for the three (3) major drainage basins until the Kalo'i drainage system is completed, and a drainage easement across Navy land is approved.
2. Table 2.1 of the DEIS indicates that Roberts Hawaii School Bus, Inc. is a current tenant on the project site. This company stores up to 30 school buses and 60 handi-van vehicles. The applicant should include a map, or revise Figure 2.3 to show where this activity is located. A preliminary check of our records indicates that there is no land use approval for this use. Unless documentation is available granting the outdoor storage use, we will assume the use has not been permitted.
3. On Page 74, regarding transportation impacts, a transit reduction factor was applied under Scenario A, but there is no description of the factor or any statements as to how the factor is being applied or how it was determined. There should be a disclosure of the assumptions being used to calculate the transit factor and any other assumptions used throughout the traffic analysis section of the DEIS. At the very least, there should be citations of references to the traffic report appendix.

The traffic impact analysis does not adequately describe current conditions on the H-1 Freeway and the interchanges at Kunia and Makakilo in which project traffic would feed into. During the AM peak period, motorists on the H-1 Freeway frequently experience accidents and stalled vehicles along the segment of H-1 from Kunia to Aiea. The accident/stalled vehicle events cause traffic to back up to Kapolei, which affect all

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
April 7, 2008
Page 2

eastbound on-ramps to the H-1 and surface streets leading to the H-1 on-ramps during these events. These events have been increasing and occur about 1-2 times per week, sometimes not always backed up to Kapolei, but usually about halfway between Kunia and Kapolei. Since the H-1 between Kunia and Aiea lack shoulder lanes to allow vehicles to pull off the travel lanes, even minor accidents and stalled vehicles create very long delays to motorists. The DEIS does not adequately address these recurring events and the contribution of the project traffic would probably increase the frequency of these events. The Traffic Impact Analysis Report (TIAR) should include measures to address these situations and not just the improvements planned for local roads leading up to the H-1.

The TIAR should better describe current PM peak conditions at the Fort Barrette/Farrington Highway intersection where traffic conditions cause long queues that affect the Makakilo/Kapolei westbound off-ramp queues, which affects through traffic on the H-1 just east of the Makakilo interchange. As the Fort Barrette Road/Farrington Highway intersection increases in v/c, the TIAR should describe projected PM peak conditions on the west-bound off ramp and the effect on H-1 through lanes.

Lastly, the FEIS should discuss the timing of major transportation improvements against the project's timeline.

4.

The Department of Planning and Permitting (DPP) is currently processing two (2) separate but similar revisions to the Ewa, Central Oahu (CO), and Primary Urban Center (PUC) Public Infrastructure Maps (PIM) regarding the Honolulu High Capacity Transit Corridor Project.

In February 2008, the Department of Transportation Services (DTS), submitted a proposal to the DPP to revise the Ewa, CO, and PUC PIM by adding symbols for a "Rapid Transit Corridor," "Transit Stations," "Corporation Yard," and "Park and Ride" facilities. The proposed symbols represent the Locally Preferred Alternative (LPA) that was approved by the City Council via Ordinance 07-1. The DTS proposal was circulated for public review and comment, and is now before the City Council for action as Resolution 08-97, CD1.

In March 2008, the City Council introduced Resolution 08-69 regarding a revision to the Ewa, CO, and PUC PIM by adding 40 "Transit Station" symbols along the length of the LPA. Resolution 08-69 does not include symbols for the rapid transit corridor, corporation yards, or park and ride facilities. The DPP is currently preparing to circulate the proposal for public review and comment before forwarding a report and draft resolution to the City Council for action.

In view of these recent developments, we recommend adding a new subsection to Section 5.3 of the FEIS that briefly discusses the role of the PIM process, and how these resolutions may affect the proposed project.

Mr. Vincent Shigekuni, Vice President
PBR Hawaii
April 7, 2008
Page 3

The Proposed Circulation Plan (Figure 2.8) should be amended to reflect the City's proposal in Resolution 08-87, CD1 for the Honolulu High Capacity Transit Corridor Project. Resolution 08-97, CD1 shows PIM symbols for the proposed alignment, transit stations, and corporation yard. Adoption of Resolution 08-97, CD1 is expected on May 7, 2008.

These comments do not constitute our final comments on this project. As it proceeds through the entitlement process, we expect to ask for more information pursuant to zone change and permitting requirements. Should you have any questions, please contact Tim Hata of our staff at 788-8043.

Very truly yours,



Henry Eng, FAICP, Director
Department of Planning and Permitting

HE:js

cc: OEQC
Land Use Commission

P:\DW\Function\EA-EIS\2007\HOOPILI EIS\2007\GEN8.doc



August 11, 2008

W. FRANK BRANDT, ASLA
Chairman

THOMAS WITLIS, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURAKAMI, AICP
Principal

TOM SCINTILLI, AICP
Senior Associate

RAYMOND T. HIGA, ASLA
Senior Associate

KEVIN K. NISHIHAWA, ASLA
Associate

KIMIKAKI YUEN, LEED AP
Associate

SCOTT ALKRA, ABRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1821 Bishop Street
A-33 Tower, Suite 650
Honolulu, Hawaii 96813-3484
Tel: (808) 521-5631
Fax: (808) 523-1102
Email: info@pbrhawaii.com

HILO OFFICE
1115 Regional Street
Hilo, Hawaii 96720-2923
Tel: (808) 961-3223
Fax: (808) 961-1889

WAILUKU OFFICE
1787 Wai'oli Loop, Suite 5
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2628

Mr. Henry Eng, FAICP, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Eng:

Thank you for your letter dated April 7, 2008. We have reviewed your letter and offer the following responses to your comments:

1. Retention basins are proposed to mitigate increased flow into Kalo'i Gulch until the drainage system is completed. The Honouliuli drainage basin will utilize retention basins to match the design capacity of the drainage system. The West Loch drainage basin will treat all discharge for water quality prior to discharge. We concur that a drainage easement will be required for the West Loch system across Navy land or an alternate drainage solution will have to be utilized. The Draft EIS identifies an 100-year 24-hour retention. All drainage basins will need to provide retention/detention for water quality.
2. The Roberts Hawaii School Bus, Inc. is currently on a month-to-month lease that was inherited when the Petitioner purchased the property. The Petitioner has been paying industrial property taxes for the approximately one acre site. Figure 2.3: Current Lessees of the Final EIS will be revised to show the location of the Roberts Hawaii School Bus, Inc.'s bus storage site. Thank you for bringing this matter to our attention. The Petitioner will investigate this matter and take the appropriate action.

3. Responses to Comments are below:

- a. A detailed description of the transit reduction factor along with other reduction factors applied to Scenario A is provided in Chapter 4 Traffic Estimate (page 4-4) of the Ho'opili TIAR.

Mr. Henry Eng
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

- b. We acknowledge your comment that current traffic during the morning peak period result in on H-1 from Kunia to Aiea result in extensive queuing and backup. When accidents occur, stalled vehicles in traffic lanes do worsen queuing and backup due to the absence of shoulder lanes. However, as this event is an occasional event rather than a daily event, these were not discussed in the TIAR. The State DOT does have plans to take corrective action to alleviate current traffic operations. Currently, there is ongoing discussion to implement contraflow lanes for the PM peak hour between the Waiawa interchange to the Waikēle interchange which would help alleviate the traffic congestion as well. Currently, the timeline for the contraflow lane implementation is not known.
- c. As part of the Oahu Regional Transportation Plan for 2030, a new interchange is being planned at Kapolei between the Palali and the Makakilo Interchange. In addition, new eastbound and westbound ramps will be constructed for the Makakilo interchange. The PM peak hour traffic conditions at the Fort Barrette/Farrington Highway intersection should be alleviated by these new planned improvements.
- d. As recommended, the timing of major transportation improvements and their reported schedule for implementation will be shown on a map that will be included in the Final EIS as Figure 4.2 ("Ewa Regional Transportation Plan).

4. As recommended, a new subsection to the Final EIS will be created to discuss the role of the Ewa, Central Oahu, and Primary Urban Center (PUC) Public Infrastructure Maps (PIM) process and its affect on the Ho'opili project. A new Section 5.3.5 Ewa, Central Oahu and Primary Urban Center Public Infrastructure Maps (PIM) will be added to read as follows:

Based on comments received from the Department of Planning and Permitting (DPP) during the public review period, it should be noted that DPP is currently processing two separate but similar revisions to the Ewa, Central Oahu (CO) and Primary Urban Center (PUC) Public Infrastructure Maps (PIM) regarding the Honolulu High Capacity Transit Corridor Project.

In February 2008, the Department of Transportation Services (DTS) submitted a proposal to the DPP to revise the Ewa, CO and PUC PIMs by adding symbols for a "Rapid Transit Corridor," "Transit Stations," "Corporation Yard," and "Park and Ride" facilities. The proposed symbols represent the Locally Preferred Alternative (LPA) that was approved by the City Council via Ordinance 07-1. The DTS proposal was circulated for public review and comment, and adoption of Resolution 08-97 occurred on May 7, 2007. Figure 2.8, Proposed Circulation Plan of the Final EIS has been revised to reflect the City's proposal in Resolution 08-97. CDJ for the Honolulu High Capacity Transit Corridor Project.

In March 2008, the City Council introduced Resolution 08-69 regarding a revision to the Ewa, CO and PUC PIM's be adding 40 "Transit Station" symbols along the length of the LPA. Resolution 08-69 does not include symbols for the "Rapid Transit Corridor," "Corporation Yard," and "Park and Ride" facilities. The DPP is currently preparing to circulate the proposal for public review and comment before forwarding a report and draft resolution to the City Council for action.

Mr. Henry Eng
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 3

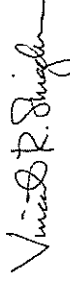
As of this writing, the City and County of Honolulu (City) has begun work on the Draft Environmental Impact Statement (EIS) for the Honolulu High Capacity Transit Corridor (HHCTC) project, with a target publication date in the second or third quarter of 2008. By the time the HHCTC Draft EIS is published, the final alignment of the "Rapid Transit Corridor and the locations of "Transit Stations," "Corporation Yard" (transit maintenance and storage), "Park and Ride" facilities in Ewa will be known. No split is being designed to be transit-ready, and the land use plan, while subject to change, has been designed to accommodate a high-capacity transit corridor either along Farrington Highway or through the project site, with either one or two transit station locations. The Petitioner acknowledges that sites for a transit maintenance and storage facility and/or a portion of a park and ride facility may be required within the Petition Area.

5. The Petitioner looks forward to continue coordinating with your department as it proceeds through the entitlement process.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

encl: Figure 2.3: Current Lessees
Figure 2.8: Proposed Circulation Plan
Figure 4.2: Ewa Regional Transportation Plan

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr: Dan Davidson, State Land Use Commission

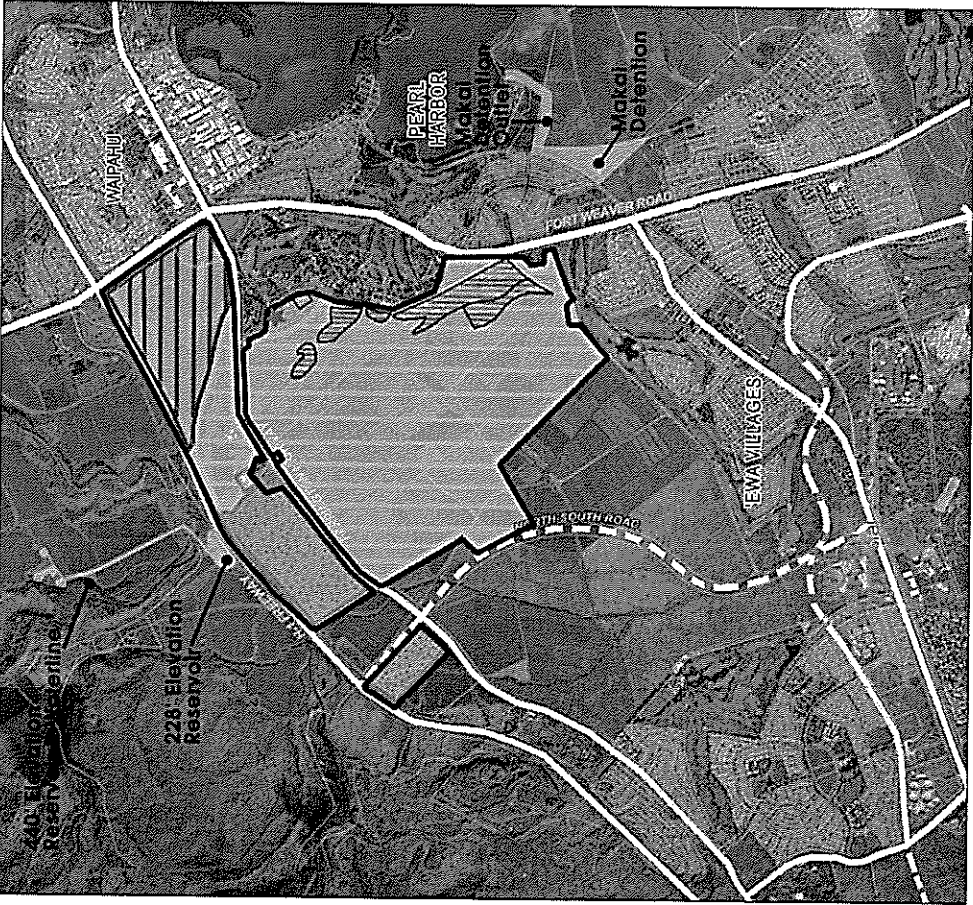


Figure 2.3: Current Lessees

HO'OPIILI
O'ahu, Hawaii

LINEAR SCALE (FEET)
0 3,000 6,000

NORTH

PIR HAWAII ASSOCIATES, INC.

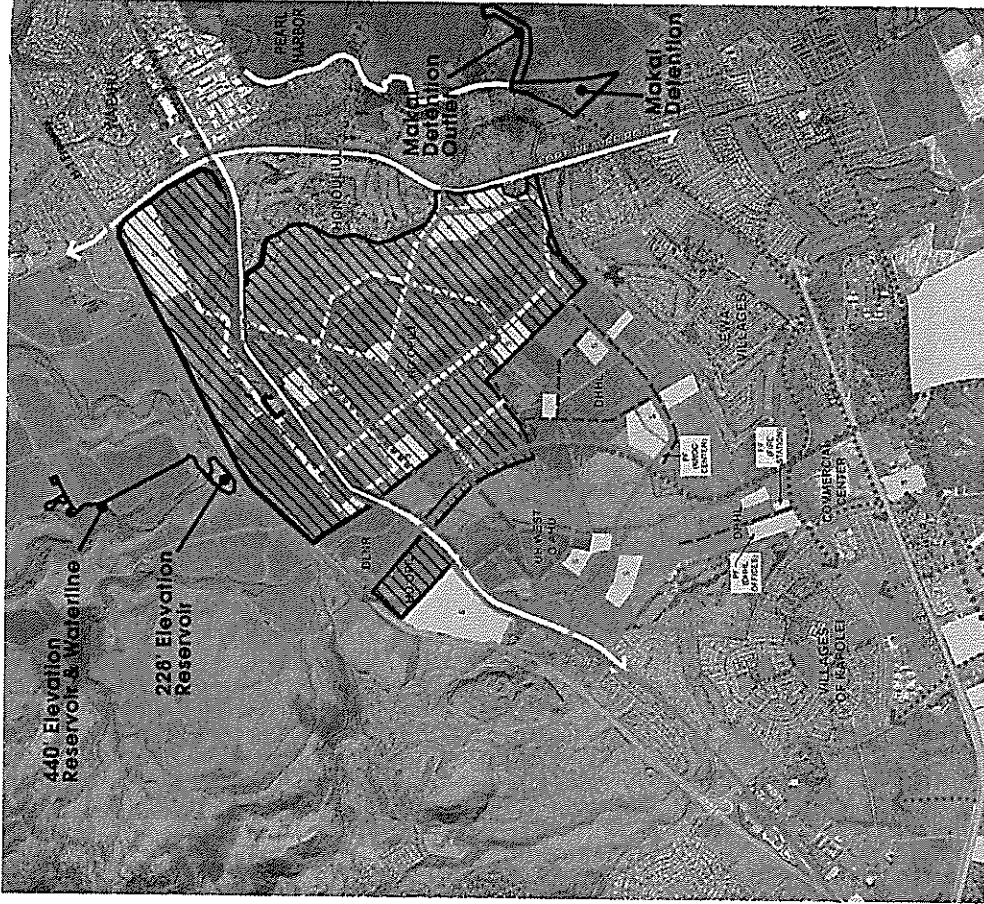


Figure 2.8: Proposed Circulation Plan

HO'OPIILI
O'ahu, Hawaii

LINEAR SCALE (FEET)
0 3,000 6,000

NORTH

PIR HAWAII ASSOCIATES, INC.

- LEGEND**
- Project Site Boundary
 - Petition Area
 - Proposed UH/Weed Oahu Bypass
 - Proposed HO'OPILI Bypass
 - Proposed DHIIL Bypass
 - Proposed Bypass by O'HEK
 - Existing State Blue Plan
 - Feet Harbor Historic Trail and Leeward Bypass
 - Express and Local Bus Routes
 - Proposed HI/CTC Corridor
 - Proposed Transit Stop
 - Allocated Shuttle
 - Proposed Parks
 - Proposed Schools
 - Proposed Public Facility
 - Right-of-Way/Right-of-Way
 - Right-of-Way/Right-of-Way
- Source: State of Hawaii Department of Transportation Bicycle Plan 2008, Draft Ewa Connectivity Study, 2007.
Disclaimer: This graphic has been prepared for general planning purposes only.

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU
 636 South Street
 Honolulu, Hawaii 96813-8007
 Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd



KENNETH G. SILVA
 FIRE CHIEF
 ALVIN K. TOMITA
 DEPUTY FIRE CHIEF

MUFI HANDEMANN
 MAYOR

March 12, 2008

Mr. Vincent Shigekuni, Vice President
 PBR Hawaii & Associates, Inc.
 American Savings Bank Tower
 1001 Bishop Street, Suite 650
 Honolulu, Hawaii 96813-3484

Dear Mr. Shigekuni:

Subject: Draft Environmental Impact Statement
 Ho'opili
 Ewa, Oahu
 Tax Map Keys: 9-1-017: 004 (portion), 059, and 072; 9-1-018: 001 and 004;
 9-1-010: 002, 014 (portion), and 015 (portion);
 9-2-001: 004, 005, 006, and 007; 9-2-002: 002

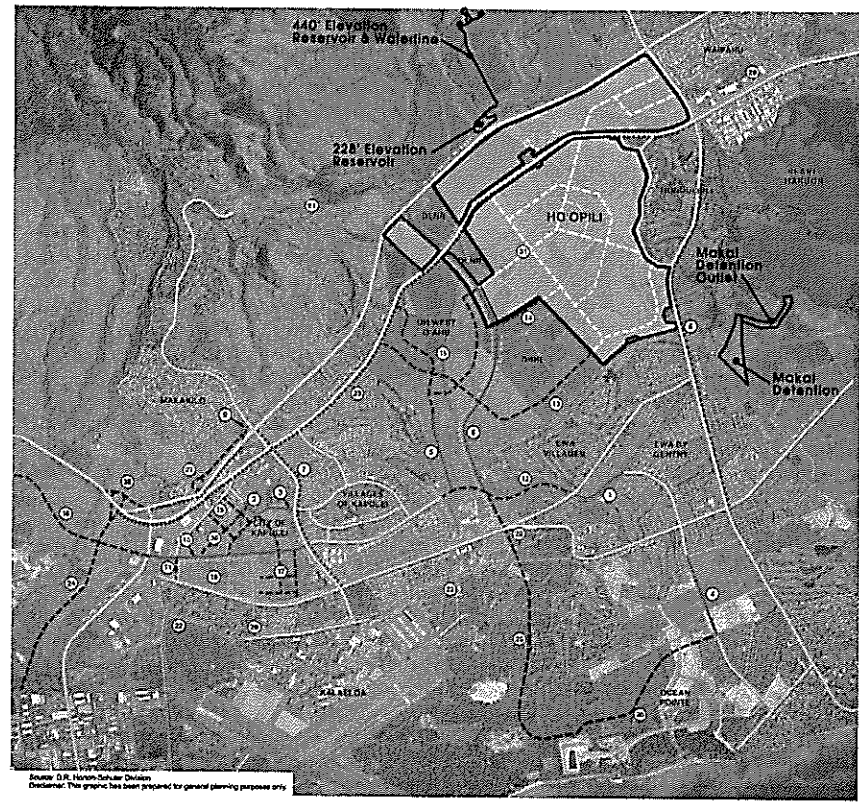
In response to your letter dated February 20, 2008, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and has no additional comments. Please refer to our comments of March 28, 2007, which were included in the Environmental Impact Statement Preparation Notice.

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

Sincerely,

 KENNETH G. SILVA
 Fire Chief

KGS/SK:ibh
 cc: Rodney Maile, Acting Director
 State of Hawaii, Land Use Commission



- 2096**
1. Ewa Regional Fire Department Station 80 and Substation 80
 2. Ewa Regional Fire Department Station 80 and Substation 80
 3. Ewa Regional Fire Department Station 80 and Substation 80
 4. Ewa Regional Fire Department Station 80 and Substation 80
 5. Ewa Regional Fire Department Station 80 and Substation 80
 6. Ewa Regional Fire Department Station 80 and Substation 80
 7. Ewa Regional Fire Department Station 80 and Substation 80
 8. Ewa Regional Fire Department Station 80 and Substation 80
 9. Ewa Regional Fire Department Station 80 and Substation 80
 10. Ewa Regional Fire Department Station 80 and Substation 80
 11. Ewa Regional Fire Department Station 80 and Substation 80
 12. Ewa Regional Fire Department Station 80 and Substation 80
 13. Ewa Regional Fire Department Station 80 and Substation 80
 14. Ewa Regional Fire Department Station 80 and Substation 80
 15. Ewa Regional Fire Department Station 80 and Substation 80
 16. Ewa Regional Fire Department Station 80 and Substation 80
 17. Ewa Regional Fire Department Station 80 and Substation 80
 18. Ewa Regional Fire Department Station 80 and Substation 80
 19. Ewa Regional Fire Department Station 80 and Substation 80
 20. Ewa Regional Fire Department Station 80 and Substation 80
 21. Ewa Regional Fire Department Station 80 and Substation 80
 22. Ewa Regional Fire Department Station 80 and Substation 80
 23. Ewa Regional Fire Department Station 80 and Substation 80
 24. Ewa Regional Fire Department Station 80 and Substation 80
 25. Ewa Regional Fire Department Station 80 and Substation 80
 26. Ewa Regional Fire Department Station 80 and Substation 80
 27. Ewa Regional Fire Department Station 80 and Substation 80
 28. Ewa Regional Fire Department Station 80 and Substation 80
 29. Ewa Regional Fire Department Station 80 and Substation 80
 30. Ewa Regional Fire Department Station 80 and Substation 80
 31. Ewa Regional Fire Department Station 80 and Substation 80
 32. Ewa Regional Fire Department Station 80 and Substation 80
 33. Ewa Regional Fire Department Station 80 and Substation 80
 34. Ewa Regional Fire Department Station 80 and Substation 80
 35. Ewa Regional Fire Department Station 80 and Substation 80
 36. Ewa Regional Fire Department Station 80 and Substation 80
 37. Ewa Regional Fire Department Station 80 and Substation 80
 38. Ewa Regional Fire Department Station 80 and Substation 80
 39. Ewa Regional Fire Department Station 80 and Substation 80
 40. Ewa Regional Fire Department Station 80 and Substation 80
 41. Ewa Regional Fire Department Station 80 and Substation 80
 42. Ewa Regional Fire Department Station 80 and Substation 80
 43. Ewa Regional Fire Department Station 80 and Substation 80
 44. Ewa Regional Fire Department Station 80 and Substation 80
 45. Ewa Regional Fire Department Station 80 and Substation 80
 46. Ewa Regional Fire Department Station 80 and Substation 80
 47. Ewa Regional Fire Department Station 80 and Substation 80
 48. Ewa Regional Fire Department Station 80 and Substation 80
 49. Ewa Regional Fire Department Station 80 and Substation 80
 50. Ewa Regional Fire Department Station 80 and Substation 80
- 2097-2099**
1. Ewa Regional Fire Department Station 80 and Substation 80
 2. Ewa Regional Fire Department Station 80 and Substation 80
 3. Ewa Regional Fire Department Station 80 and Substation 80
 4. Ewa Regional Fire Department Station 80 and Substation 80
 5. Ewa Regional Fire Department Station 80 and Substation 80
 6. Ewa Regional Fire Department Station 80 and Substation 80
 7. Ewa Regional Fire Department Station 80 and Substation 80
 8. Ewa Regional Fire Department Station 80 and Substation 80
 9. Ewa Regional Fire Department Station 80 and Substation 80
 10. Ewa Regional Fire Department Station 80 and Substation 80
 11. Ewa Regional Fire Department Station 80 and Substation 80
 12. Ewa Regional Fire Department Station 80 and Substation 80
 13. Ewa Regional Fire Department Station 80 and Substation 80
 14. Ewa Regional Fire Department Station 80 and Substation 80
 15. Ewa Regional Fire Department Station 80 and Substation 80
 16. Ewa Regional Fire Department Station 80 and Substation 80
 17. Ewa Regional Fire Department Station 80 and Substation 80
 18. Ewa Regional Fire Department Station 80 and Substation 80
 19. Ewa Regional Fire Department Station 80 and Substation 80
 20. Ewa Regional Fire Department Station 80 and Substation 80
 21. Ewa Regional Fire Department Station 80 and Substation 80
 22. Ewa Regional Fire Department Station 80 and Substation 80
 23. Ewa Regional Fire Department Station 80 and Substation 80
 24. Ewa Regional Fire Department Station 80 and Substation 80
 25. Ewa Regional Fire Department Station 80 and Substation 80
 26. Ewa Regional Fire Department Station 80 and Substation 80
 27. Ewa Regional Fire Department Station 80 and Substation 80
 28. Ewa Regional Fire Department Station 80 and Substation 80
 29. Ewa Regional Fire Department Station 80 and Substation 80
 30. Ewa Regional Fire Department Station 80 and Substation 80
 31. Ewa Regional Fire Department Station 80 and Substation 80
 32. Ewa Regional Fire Department Station 80 and Substation 80
 33. Ewa Regional Fire Department Station 80 and Substation 80
 34. Ewa Regional Fire Department Station 80 and Substation 80
 35. Ewa Regional Fire Department Station 80 and Substation 80
 36. Ewa Regional Fire Department Station 80 and Substation 80
 37. Ewa Regional Fire Department Station 80 and Substation 80
 38. Ewa Regional Fire Department Station 80 and Substation 80
 39. Ewa Regional Fire Department Station 80 and Substation 80
 40. Ewa Regional Fire Department Station 80 and Substation 80
 41. Ewa Regional Fire Department Station 80 and Substation 80
 42. Ewa Regional Fire Department Station 80 and Substation 80
 43. Ewa Regional Fire Department Station 80 and Substation 80
 44. Ewa Regional Fire Department Station 80 and Substation 80
 45. Ewa Regional Fire Department Station 80 and Substation 80
 46. Ewa Regional Fire Department Station 80 and Substation 80
 47. Ewa Regional Fire Department Station 80 and Substation 80
 48. Ewa Regional Fire Department Station 80 and Substation 80
 49. Ewa Regional Fire Department Station 80 and Substation 80
 50. Ewa Regional Fire Department Station 80 and Substation 80
- 2100-2111**
1. Ewa Regional Fire Department Station 80 and Substation 80
 2. Ewa Regional Fire Department Station 80 and Substation 80
 3. Ewa Regional Fire Department Station 80 and Substation 80
 4. Ewa Regional Fire Department Station 80 and Substation 80
 5. Ewa Regional Fire Department Station 80 and Substation 80
 6. Ewa Regional Fire Department Station 80 and Substation 80
 7. Ewa Regional Fire Department Station 80 and Substation 80
 8. Ewa Regional Fire Department Station 80 and Substation 80
 9. Ewa Regional Fire Department Station 80 and Substation 80
 10. Ewa Regional Fire Department Station 80 and Substation 80
 11. Ewa Regional Fire Department Station 80 and Substation 80
 12. Ewa Regional Fire Department Station 80 and Substation 80
 13. Ewa Regional Fire Department Station 80 and Substation 80
 14. Ewa Regional Fire Department Station 80 and Substation 80
 15. Ewa Regional Fire Department Station 80 and Substation 80
 16. Ewa Regional Fire Department Station 80 and Substation 80
 17. Ewa Regional Fire Department Station 80 and Substation 80
 18. Ewa Regional Fire Department Station 80 and Substation 80
 19. Ewa Regional Fire Department Station 80 and Substation 80
 20. Ewa Regional Fire Department Station 80 and Substation 80
 21. Ewa Regional Fire Department Station 80 and Substation 80
 22. Ewa Regional Fire Department Station 80 and Substation 80
 23. Ewa Regional Fire Department Station 80 and Substation 80
 24. Ewa Regional Fire Department Station 80 and Substation 80
 25. Ewa Regional Fire Department Station 80 and Substation 80
 26. Ewa Regional Fire Department Station 80 and Substation 80
 27. Ewa Regional Fire Department Station 80 and Substation 80
 28. Ewa Regional Fire Department Station 80 and Substation 80
 29. Ewa Regional Fire Department Station 80 and Substation 80
 30. Ewa Regional Fire Department Station 80 and Substation 80
 31. Ewa Regional Fire Department Station 80 and Substation 80
 32. Ewa Regional Fire Department Station 80 and Substation 80
 33. Ewa Regional Fire Department Station 80 and Substation 80
 34. Ewa Regional Fire Department Station 80 and Substation 80
 35. Ewa Regional Fire Department Station 80 and Substation 80
 36. Ewa Regional Fire Department Station 80 and Substation 80
 37. Ewa Regional Fire Department Station 80 and Substation 80
 38. Ewa Regional Fire Department Station 80 and Substation 80
 39. Ewa Regional Fire Department Station 80 and Substation 80
 40. Ewa Regional Fire Department Station 80 and Substation 80
 41. Ewa Regional Fire Department Station 80 and Substation 80
 42. Ewa Regional Fire Department Station 80 and Substation 80
 43. Ewa Regional Fire Department Station 80 and Substation 80
 44. Ewa Regional Fire Department Station 80 and Substation 80
 45. Ewa Regional Fire Department Station 80 and Substation 80
 46. Ewa Regional Fire Department Station 80 and Substation 80
 47. Ewa Regional Fire Department Station 80 and Substation 80
 48. Ewa Regional Fire Department Station 80 and Substation 80
 49. Ewa Regional Fire Department Station 80 and Substation 80
 50. Ewa Regional Fire Department Station 80 and Substation 80
- LEGEND**
- Fire Station Boundary
 - Fire Station
 - Emergency Route
 - Compared Under Construction Planning
 - Proposed Fire Station (2007-2009)
 - Proposed Fire Station (2010-2012)
 - Proposed Fire Station (2013-2015)
 - Proposed Fire Station (2016-2018)
 - Proposed Fire Station (2019-2021)
 - Proposed Fire Station (2022-2024)
 - Proposed Fire Station (2025-2027)
 - Proposed Fire Station (2028-2030)
 - Proposed Fire Station (2031-2033)
 - Proposed Fire Station (2034-2036)
 - Proposed Fire Station (2037-2039)
 - Proposed Fire Station (2040-2042)
 - Proposed Fire Station (2043-2045)
 - Proposed Fire Station (2046-2048)
 - Proposed Fire Station (2049-2051)
 - Proposed Fire Station (2052-2054)
 - Proposed Fire Station (2055-2057)
 - Proposed Fire Station (2058-2060)
 - Proposed Fire Station (2061-2063)
 - Proposed Fire Station (2064-2066)
 - Proposed Fire Station (2067-2069)
 - Proposed Fire Station (2070-2072)
 - Proposed Fire Station (2073-2075)
 - Proposed Fire Station (2076-2078)
 - Proposed Fire Station (2079-2081)
 - Proposed Fire Station (2082-2084)
 - Proposed Fire Station (2085-2087)
 - Proposed Fire Station (2088-2090)
 - Proposed Fire Station (2091-2093)
 - Proposed Fire Station (2094-2096)
 - Proposed Fire Station (2097-2099)
 - Proposed Fire Station (2100-2102)
 - Proposed Fire Station (2103-2105)
 - Proposed Fire Station (2106-2108)
 - Proposed Fire Station (2109-2111)

Figure 4.2: Ewa Regional Transportation Plan
HO'OPIILI
 Oahu, Hawaii
 SCALE: 1" = 1,000'
 NORTH

Source: D.F. Horton-Tobias Division
 Disclaimer: This graphic has been prepared for general planning purposes only.



August 11, 2008

WE FRANK BRANTTI, PASLA
Chairman

TUDJASS WITTEN, ASLA
President

R. STAN BUNCAN, ASLA
Executive Vice-President

RUSSELL M. CHUNG, PASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MURKAWAMI, AICP
Principal

TOM SCHEINELL, AICP
Senior Associate

RAYMOND E. HIGA, ASLA
Senior Associate

KIYUKI K. NISHIKAWA, ASLA
Associate

KIMI MURAKAMI, LEED AP
Associate

SCOTT ALMA, AIA, AIA
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1001 Bishop Street
ASB Tower, Suite 600
Honolulu, Hawaii 96813-3461
Tel: (808) 531-5631
Fax: (808) 531-1162
E-mail: svshigeki@pbrhawaii.com

HILO OFFICE
101 August Street
Hilo Logistics Center, Suite 310
Hilo, Hawaii 96720-4262
Tel: (808) 931-3111
Fax: (808) 951-4989

WAILUKO OFFICE
1000 Waiola Street, #4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2878

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET - HONOLULU, HAWAII 96813
TELEPHONE: (808) 525-3111 - INTERNET: www.honolulu.gov



BOI SSE P. CORREA
CHIEF

PAUL D. PUTZIGLO
MICHAEL D. TUCKER
DEPUTY CHIEFS

BOI SSE P. CORREA
CHIEF

March 5, 2008

OUR REFERENCE BS-KP

Mr. Vincent Shigekuni, Vice President
PBR Hawaii & Associates, Inc.
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

This is in response to your letter of February 20, 2008, requesting comments on a Draft Environmental Impact Statement for the Ho'opi'i project in Ewa.

The Honolulu Police Department (HPD) will need to expand its patrol services as Ho'opi'i is developed, given that beat 879 (which now has only a few homes) will eventually have another 11,750 units and at least 35,000 new residents. The HPD looks forward to making the best use of the public facility site proposed by the developer as planning progresses.

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

Sincerely,

BOI SSE P. CORREA
Chief of Police

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

cc: Mr. Rodney Maille
Land Use Commission

Serving and Protecting With Aloha

SUBJECT: HO'OPI'I DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Chief Silva:

Thank you for your letter dated March 12, 2008. We acknowledge that the Honolulu Fire Department (HFD) has no additional comments, other than those provided in a letter dated March 28, 2007 on the Environmental Impact Statement Preparation Notice.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

0:\6462925\03.01 DR H Homan-E Kapolei\EIS\Final EIS\Final EIS Response Letters\BL-06 IJFD Response.doc



W. FRANK BIRNBAUM, FESIA
Chairman

THOMAS W. HITES, ASIA
President

R. STAN DUNCAN, ASIA
Executive Vice-President

RUSSELL J. CURING, PARI A
Executive Vice-President

VINCENT SHIGERIKI
Vice-President

GRANT T. MURAKAMI, AICP
Principal

TOM SCHINELL, AICP
Senior Associate

KAYMOND T. HIGA, ASIA
Senior Associate

KEVIN K. NISHIKAWA, ASIA
Associate

KIMI MIKAMI YUEN, LUDP/AP
Associate

SCOTT ALISA ARMIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
100 Bishop Street, Suite 620
Honolulu, Hawaii 96813-3381
Tel: (808) 941-5631
Fax: (808) 523-1402
E-mail: systems@pbrhawaii.com

HILO OFFICE
101 Airport Street
Hilo, Japan Center, Suite 219
Hilo, Hawaii 96720
Tel: (808) 941-3333
Fax: (808) 941-4989

WAIKALOA OFFICE
1255 Wai'ale'ale, Suite 4
Waikaloa, Hawaii 96735-1271
Tel: (808) 242-2878

August 11, 2008

Mr. Boisse P. Correa, Chief of Police
Police Department
City and County of Honolulu
801 South Beretania Street
Honolulu, Hawaii 96813

Attn: Major Michael Moses/Mr. Brandon Stone

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Chief Correa:

Thank you for your letter dated March 5, 2008 (your reference number: BS-KP). We acknowledge that the Honolulu Police Department (HPD) will need to expand its patrol services as the project is developed. As such, we look forward to coordinating with the HPD to make the best use of the proposed public facility site as planning progresses.

The first paragraph of Section 4.9.2 *Police Protection, Anticipated Impacts and Mitigation Measures* of the EIS will be revised as follows:

The project will increase the population of Kapolei and the demand for police service. According to the Ewa Development Plan, the 'Ewa Villages Substation is planned to service the East 'Ewa region, which includes the Ho'opili project. The service date for this substation has yet to be determined. The Petitioner is proposing a public facility site immediately mauka of Farrington Highway near the western portion of Parcel B for a use such as a police substation, fire station and/or emergency medical service (EMS) site. During the public review period for the EISPN, the HPD wrote that "the project should have no unanticipated impact on the facilities or operations of the Honolulu Police Department." During the public review period for the Draft EIS, the HPD wrote that "the Ho'opili is developed...the HPD looks forward to making the best use of the public facility site proposed by the developer as planning progresses."

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

Mr. Boisse P. Correa
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,
PBR HAWAII

Vincent R. Shirgekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

RECEIVED

APR 30 2008

EIS

PBR HAWAII

April 28, 2008



Mr. Vincent Shigekuni, Vice President
PBR Hawaii & Associates, Inc.
ASB Tower - Suite 650
1001 Bishop Street
Honolulu, HI 96813-3484

Dear Mr. Shigekuni:

Re: Ho'opili

Thank you for the opportunity to comment on the above-referenced project. Hawaiian Electric Company, Inc. (HECO) has no objections at this time. The following comments were received from our Engineering and Construction & Maintenance Departments:

- (1) Engineering/Transmission & Distribution (Sherman Uyehara, 543-7538). HECO has existing overhead and underground facilities within the subject property and will require continued access for maintenance purposes.
The existing overhead electrical facilities along Farrington Highway contain 46kV subtransmission lines, and the area behind the Ewa Nui Substation contain 138kV transmission lines. The relocation of a 46kV line may require a determination by the Public Utilities Commission (PUC) that the line should be constructed overhead (versus underground), pursuant to HRS 269-27.6, and may require a PUC public hearing for overhead construction through a residential area, pursuant to HRS 269-27.5. The PUC approval process for overhead relocation could take from nine months to a year, but may take longer depending on the timing, schedule and complexity of the project. HECO will not be able to order materials or start construction until the requisite PUC approvals are received.

Should it become necessary to relocate HECO's facilities, please immediately submit a request in writing and we will work with you so that construction of the project may proceed as smoothly as possible. Please note that there may be costs associated with any relocation work, and that such costs may be borne by the requestor. Because any redesign or relocation of HECO's facilities may cause lengthy delays, upon determination that HECO facilities will need to be relocated, HECO should be notified immediately in order to minimize any delays in or impacts on the project schedule.

During the planning and design phase of the project, please keep in mind that State Law [OSHA 1910.263(k)(2)(B)] requires that a worker and the longest object he/she may contact cannot come closer than a minimum radial clearance of ten feet when working close to or under any overhead lines rated 50kV and below. For each additional 10kV above 50kV, an additional four inches shall be added to the ten-foot clearance requirement. In addition, a minimum clearance of ten feet must be maintained during

Mr. Vincent Shigekuni
April 28, 2008
Page Two

excavation around utility poles and/or their anchor systems to prevent weakening or pole support failure. Clearances shall be maintained between HECO's ductlines and all adjacent structures, according to HECO's Standards.

We appreciate your efforts to keep us apprised of the planning process. As the project progresses, please continue to keep us informed. We will be better able to evaluate any effects on our system facilities further along in the project's development. We request that development plans show all affected HECO facilities, and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.

- (2) Engineering/Telecommunications Section (Dixon Lau, 543-7543). HECO has existing overhead telecommunications facilities along with our electrical facilities within Parcels A, B and C of the proposed project. Please keep us informed in the same manner as requested above by our Transmission & Distribution Division.

- (3) Engineering/Transmission Substation Section (Hope Hamada, 543-7216). Currently, there are existing substation facilities within the project area, mainly within Parcel B (TMK 9-2-28: 01). Please also keep us informed as requested by our Transmission & Distribution Division.

- (4) Construction & Maintenance (Paul Nakagawa, 543-7062). We will need continued access to our facilities for maintenance purposes, as covered by our existing easement(s). Should relocation of or additional facilities be required, a formal request should be submitted and coordinated through appropriate HECO department(s).

To ensure HECO's continuing input in this project, I suggest dealing directly with the points of contact noted above. Thank you again for the opportunity to comment.

Sincerely,

Kirk S. Tomita
Senior Environmental Scientist

cc: Mr. Rodney Maile (LUC)
S. Uyehara/M. Lum
H. Hamada/D. Lau/R. Shiroma/D.M. Arakaki
P. Nakagawa





August 11, 2008

W FRANK IRIBANDI, FASLA
Chairman

THOMAS WITTE, ASLA
President

B STANJUNCAN, ASLA
Executive Vice-President

RUSSELL CHUNG, FASLA
Executive Vice-President

VINCENT SHIGIKINI
Vice-President

GRANT J. MURKAM, AICP
Principal

TOM SCHINELL, AICP
Senior Associate

PAMONOT HIGA, ASLA
Senior Associate

KVIN K. NISHIKAWA, ASLA
Associate

KIMIKAHAM YUEN, LEED AP
Associate

SCOTT AINA, AIBCGO
Associate

SCOTT MURKAM, ASLA
Associate

HONOLULU OFFICE
1621 Bishop Street
ASR Tower, Suite 650
Honolulu, Hawaii 96813-3434
Tel: (808) 531-5601
Fax: (808) 523-1462
E-mail: ppadmin@pbrhawaii.com

HECO OFFICE
101 Aupuni Street
Hilo Legation Center, Suite 310
Hilo, Hawaii 96720-4963
Tel: (808) 933-1125
Fax: (808) 933-1999

WAILUKU OFFICE
1675 Wai'anae Loop, Suite 4
Wailuku, Hawaii 96791-2711
Tel: (808) 342-2628

Mr. Kirk S. Tomita
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

4. The Petitioner intends to comply with State Law [OSHA 1910.269(k)(2B)] during the planning and design phase of the project. It is also acknowledged that a minimum of clearance of ten feet must be maintained during excavation around utility poles and/or their anchor systems to prevent weakening or pole support failure. Additionally, it is acknowledged that clearances shall be maintained between HECO's ductlines and all adjacent structures, according to HECO's Standards.

5. The Petitioner's civil and electrical engineering consultants will continue to coordinate with HECO's Transmission & Distribution Section as plans progress. As requested, development plans will show all affected HECO facilities, and address any conflicts between the proposed plans and HECO's existing facilities. Pre-final development plans will be forwarded to HECO for review.

Engineering/Telecommunications Section

1. We acknowledge that HECO has existing overhead telecommunication facilities along HECO's electrical facilities within Parcels A, B and C of the proposed project. The Petitioner's civil and electrical engineering consultants will continue to coordinate with HECO's Telecommunications Section as plans progress.

Engineering/Transmission, Substation Section

1. We believe that the TMK that HECO cites as being within the Petition Area is incorrect. The parcel identified as TMK: 9-2-28: 01 appears to be located near the intersection of Makakilo Drive and Palahia Drive. We believe the Ewa Nui Substation is identified as TMK: 9-1-18: 06 and is not part of (but surrounded by) a portion of the project site identified as TMK: 9-1-18: 06. The Petitioner's civil and electrical engineering consultants will continue to coordinate with HECO's Transmission Substation Section as plans progress.

Construction & Maintenance

1. As noted earlier in this letter, the Petitioner acknowledges that HECO will need continued access for maintenance purposes. Should the relocation of additional facilities be required, a formal request will be submitted and coordinated through the appropriate HECO department(s).

Engineering/Transmission & Distribution

Dear Mr. Tomita:
Thank you for your letter dated April 28, 2008. We acknowledge that the Hawaiian Electric Company, Inc. (HECO) has no objections at this time. We have reviewed your letter and offer the following responses to your comments:

Engineering/Transmission & Distribution

1. We acknowledge that HECO has existing overhead and underground facilities within the subject property and will require continued access for maintenance purposes.

2. According to Bills Engineering, the project civil engineer, all overhead lines may have to be relocated with the exception of the 138kV (kilovolt) lines. The 12kV and 46kV lines that may become subject to relocation would most likely be placed underground. We acknowledge that the potential relocation of 46kV subtransmission lines along Farrington Highway may require a determination by the State of Hawaii's Public Utilities Commission (PUC) that the line be constructed overhead versus underground and may require a PUC public hearing for overhead construction through a residential area pursuant to HRS 269-27.5. Your company is probably aware that the City and County of Honolulu has long had plans to widen and improve Farrington Highway (between the Kapolei Golf Course to Fort Weaver Road), so please be assured that the Petitioner is unlikely to develop residential uses along Farrington Highway until the City and County of Honolulu has finalized their plans for improving Farrington Highway.

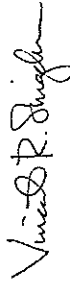
3. We acknowledge that the PUC approval process for overhead relocation could take from nine months to a year, but may take longer depending on the timing, schedule and complexity of the project and that HECO will not be able to order materials or start construction until the requisite PUC approvals are received. Should the project's development require the relocation of HECO's facilities, the Petitioner will notify HECO immediately in order to minimize any delays in or impacts on the project schedule. As previously noted, this is likely to occur after the City and County of Honolulu has finalized their plans for improving Farrington Highway.

Mr. Kirk S. Tomita
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 3

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Keoloha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\Jobs\252503.01 DR. Honoa-E. Kapolei\EIS\Final EIS\Final EIS Response Letter\BL-36 (IECO Response).doc



April 8, 2008

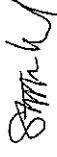
Mr. Vincent Shigekuni
Vice President
PBR Hawaii & Associates, Inc.
ASB Tower
1001 Bishop Street, Suite 650
Honolulu, HI 96813

Dear Mr. Shigekuni:

Comments on Ho'opili Draft
Environmental Impact Statement Dated February 2008

Thank you for the opportunity to comment on the Ho'opili Draft Environmental Impact Statement. We appreciate the opportunity to continue to be consulted as the planning for the project evolves.

Sincerely,



Steve Kelly
Manager, Development

gs:0103000K10044

cc: Rodney Maile, Interim Executive Officer
Land Use Commission, State of Hawaii



August 11, 2008

W. FRANK BRANDT, FLSA
Chairman

THOMAS W. HINES, ASLA
President

R. STAN DUNING, ASLA
Executive Vice-President

RUSSELL Y. CHUNG, FASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. MIKAKAMI, AICP
Principal

TOM SCHINDEL, AICP
Senior Associate

RAYMOND T. JICA, ASLA
Senior Associate

MYUNG K. NISHIKAWA, ASLA
Associate

KIMI MIKAKAMI, LEED AP
Associate

SCOTT ALBA, AIRGO
Associate

SCOTT MIKAKAMI, ASLA
Associate

HONOLULU OFFICE
1501 Bishop Street, 40
Honolulu, Hawaii 96813-3481
Tel: (808) 531-5631
Fax: (808) 531-1482
E-mail: syshigekuni@pbrhawaii.com

HILO OFFICE
101 Aupuni Street
Hilo Lagoon Center, Suite 319
Hilo, Hawaii 96720
Tel: (808) 983-3132
Fax: (808) 951-3399

WAILUKU OFFICE
1025 Wahi Oia Parkway, Suite 4
Wailuku, Hawaii 96731-1171
Tel: (808) 242-2876



HASEKO (Ewa), Inc.

April 14, 2008

Mr. Vincent R. Shigekuni
Vice President
PBR Hawaii
ASB Tower, Suite 650
1001 Bishop Street
Honolulu, Hawaii 96813

Dear Mr. Shigekuni:

Haseko (Ewa), Inc. (Haseko) offers the following comments on the Ho'opi'i Draft Environmental Impact Statement (DEIS).

Haseko is the owner and developer of the Ocean Pointe and Hoakalei developments, located at the makai end of the Kalo'i Gulch drainage basin. We are thankful that Ho'opi'i shares our concern for the well-being of our neighbors within the Kalo'i watershed, and appreciate the discussion included in the DEIS on drainage issues and the acknowledgment of special storm water discharge restrictions on developments within the Kalo'i Gulch drainage basin on until such time as an ocean outlet is constructed. Essentially, developments within the Kalo'i Gulch drainage basin are not allowed to increase overall flows or channelized storm water flows until there is an ocean outlet for storm water discharge.

The ability to construct the ocean outlet is dependent upon issuance of a conservation district use permit (CDUP) by the State Board of Land and Natural Resources. Haseko has applied for the CDUP, which is now being processed through a contested case proceeding. Although Haseko, as the applicant, and Gentry, as an intervenor, are the only two parties in the contested case in support of the CDUP application, all developments within the Kalo'i Gulch drainage basin will be affected by the decision in this case.

Please note that the location of the proposed ocean outlet is at One'ula Beach Park, and not at 'Ewa Marina (now known as Hoakalei Marina) as stated on page 208 of the DEIS. Because of the potential environmental problems associated with intersecting the Kalo'i Gulch regional drainage system with the Honouliuli sewer outfall pipe, the outlet has been relocated from the marina, which is to the west of the sewer outfall pipe, to the beach park, which lies east of the outfall. In June, 2007, the Honolulu City Council approved this relocation by issuing a special management area use permit for that purpose (Resolution No. 07-118, CD1).

SUBJECT: HO'OPI'I DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Kelly:

Thank you for your letter dated April 8, 2008 and for your participation in the Environmental Impact Statement process for this project. Please be assured that you will continue to be consulted as the planning for this project progresses. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Keuloha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\0625\2503.01 DR Horton-E Kapolei\EIS\Final EIS\Final EIS Response Letter\BL-25 City of Kapolei Response.doc



August 11, 2008

W. FRANK BRAND/ASIA
Chairman

THOMAS WITTEN/ASIA
President

R. STAN DUNCAN/ASIA
Executive Vice-President

RUSSELL J. CHUNG/PSIA
Executive Vice-President

VINCENT SHIGEKUMI
Vice-President

GRANT L. MURAKAMI/ACP
Principal

TOM SCHINILLI/ACP
Senior Associate

RAYMOND J. HIGA/ASIA
Senior Associate

KEVIN N. NISHIKAWA/ASIA
Associate

KIMUKIYUKI YUN/LELIP/AP
Associate

SCOTT ALIKA/AMIGO
Associate

SCOTT MURAKAMI/ASIA
Associate

HONOLULU OFFICE
1071 Bishop Street
4th Floor, Suite 620
Honolulu, Hawaii 96813-5884
Tel: (808) 521-2641
Fax: (808) 523-1402
E-mail: opinion@pbrhawaii.com

HIO OFFICE
101 Alapai Street
10th Floor, Suite 110
Hilo, Hawaii 96720-8202
Tel: (808) 961-2323
Fax: (808) 961-4987

WAILUANI OFFICE
1787 Waihi Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 242-2675

Mr. Vincent R. Shigekumi
April 14, 2008
Page 2

We look forward to the successful realization of Ho'opili and the traffic improvements and other community benefits this master-planned development will help bring to the 'Ewa Plain.

Thank you for the opportunity to review and comment on the DEIS.

Very truly yours,

NANCY MAEDA
Executive Vice President

NM:al

Ms. Nancy Maeda, Executive Vice President
HASEKO (Ewa), Inc.
91-1001 Kaimalie Street, Suite 205
'Ewa Beach, Hawaii 'i 96706-5005

SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Maeda:

Thank you for your letter dated April 14, 2008. We have reviewed your letter and offer the following responses to your comments.

1. We acknowledge that developments within the Kalo'i Gulch drainage basin are not allowed to increase overall flows or channelized storm water flows until there is an ocean outlet for storm water discharge. As mentioned in the Draft EIS, with respect to the portion of the project within the Kalo'i drainage basin, the project will be creating on-site detention basins to collect all storm water runoff and discharge the flow at a rate that will not exceed pre-development conditions.

2. We concur that the location of the proposed ocean outlet is at One'ula Beach Park, and not at the Hoakalei Marina (referred to as 'Ewa Marina in the Draft EIS), Table 5.8. Ewa Development Plan - Objectives and Policies (Section 3.6.2: 'Ewa Marina, Discussion) of the Final EIS will be revised as follows:

Discussion: While the Ewa DP's policies related to the residential development of the 'Ewa Marina are not directly applicable to the Ho'opili project, the Petitioner supports the plan's objectives. While a relatively small portion of the Petition Area lies within the Kalo'i Gulch drainage basin, Ho'opili will be designed to detain future runoff from the site to current flows, until such time as the outlet to the ocean at 'Ewa Marina is opened. During the Draft EIS public review period, HASEKO (Ewa), Inc. wrote: "...the location of the proposed ocean outlet is at One'ula Beach Park, and not at 'Ewa Marina (now known as Hoakalei Marina)...Because of the potential environmental problems associated with intersecting the Kalo'i Gulch regional drainage system with the Honouliuli sewer outfall pipe, the outlet has been relocated from the marina, which is to the west of the sewer outfall pipe, to the beach park, which lies east of the outfall." HASEKO (Ewa), Inc. also wrote: "...The ability to construct the ocean outlet is dependent upon issuance of a conservation district use permit (CDUP) by the State Board of Land and Natural Resources. Haseko has applied for the CDUP, which is now being processed through a contested case proceeding..."

Leeward -- Central Community Roundtable

April 7, 2008

Dr. Kioni Dudley
Chairman
Ben Acobido
Lorain Burgess
Ann Freed
Richard Poister

Vincent Shigekuni, Vice President
PBR Hawaii
1001 Bishop Street
Honolulu, Hawaii 96813

Re: Comments on Draft EIS for Ho'opi'i project

Dear Mr. Shigekuni:

In August of 2007, the Hawaii State Supreme Court, in reversing the circuit court decision of Sierra Club vs. the State Department of Transportation, mandated, as a matter of law, the state DOT to conduct an environmental assessment of the Super Ferry which would include an analysis of the secondary and cumulative impacts as well as the primary impacts generated by the operation of the Super Ferry. The Leeward-Central Community Roundtable requests that the final EIS for the Ho'opi'i development include an analysis of the primary, secondary, and cumulative impacts of the project in the various areas below, which would include the identification of needs and deficiencies, and appropriate mitigation measures.

Traffic:

All references in this section will be to pages within the section, "Appendix L, Traffic Impact Analysis Report" of Volume 2 of the Ho'opi'i draft EIS.

Below is a combination of Table 2.7 and Table 5.3 of which provides the LOS for Peak-hour Freeway Segment operations. It includes existing conditions, and conditions for the year 2030 with rail but without the Ho'opi'i project, and conditions for the year 2030 with rail and with the Ho'opi'i project.

Morning Peak:

#	Freeway	Segment	Existing LOS	Includes rail		2030 with Ho'opi'i
				2030 without Ho'opi'i	2030 with Ho'opi'i	
1	H-1 EB	S/O Makakilo Dr.	A	E	E	F
2	H-1 EB	W/O Kunia Rd.	C	F	F	F
3	H-1 EB	W/O Pa'iwa St.	E	E	E	F
4	H-1 EB	E/O Kamehameha	D	E	E	F
5	H-2 SB	At Ka 'Uka Blvd.	D	D	D	D
6	H-1 WB	S/O Makakilo Dr.	A	C	C	C
7	H-1 WB	W/O Kunia Rd.	C	C	C	C
8	H-1 WB	W/O Pa'iwa St.	C	B	B	C
9	H-1 WB	E/O Kamehameha	C	C	C	C
10	H-2 NB	At Ka 'Uka Blvd.	B	C	C	C

92-1305 Hauone Street Kapehu, Hawaii 96707 E-mail: DJS.limited@hawaii.gov (808) 672-8888

Ms. Nancy Maeda
SUBJECT: HO'OPI'I DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

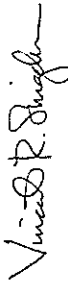
Table 5.8. Ewa Development Plan - Objectives and Policies (Section 4.6.2: Drainage Systems - Planning Principles, Discussion) of the Final EIS will be revised as follows:

Discussion: While a relatively small portion of the Petition Area lies within the Kalo'i Gulch drainage basin, Ho'opi'i will be designed to detain future runoff from the site to current flows before entering Kalo'i Gulch, until such time as the outlet to the ocean at 'Ewa Marina is opened. During the Draft EIS public review period, HASEKO (Ewa), Inc. wrote: "...the location of the proposed ocean outlet is at One'ula Beach Park and not at 'Ewa Marina (now known as Hoakalei, Marhau)...Because of the potential environmental problems associated with intersecting the Kalo'i Gulch regional drainage system with the Honouliuli sewer outfall pipe, the outlet has been relocated from the marina, which is to the west of the sewer outfall pipe, to the beach park, which lies east of the outfall." HASEKO (Ewa), Inc. also wrote: "The ability to construct the ocean outlet is dependent upon issuance of a conservation district use permit (CDUP) by the State Board of Land and Natural Resources. Haseko has applied for the CDUP, which is now being processed through a contested case proceeding."

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\e\525263.01 DR Hector-E Kapohe\EIFinal EIS\Final EIS Response Letters\BL-30 Haseko Response.doc

Afternoon Peak:

#	Freeway Segment	Existing LOS	Includes rail	Includes rail
1	H-1 EB S/O Makakilo Dr.	B	2030 without Ho'opili	2030 with Ho'opili
2	H-1 EB W/O Kumia Rd.	D	D	E
3	H-1 EB W/O Pa'iwa St.	C	D	D
4	H-1 EB E/O Kamehameha Hwy.	B	D	E
5	H-2 SB At Ka'Uka Blvd.	B	C	C
6	H-1 WB S/O Makakilo Dr.	B	F	F
7	H-1 WB W/O Kumia Rd.	C	E	F
8	H-1 WB W/O Pa'iwa St.	E	C	D
9	H-1 WB E/O Kamehameha Hwy.	E	E	F
10	H-2 NB At Ka'Uka Blvd.	C	F	F

1. Your report states on page 7 that "traffic impact" will be indicated when an LOS deteriorates to E or worse. As the table shows, four of the five Honolulu-bound Morning segments and seven of the ten segments both ways in the Afternoon show such loss when comparing the existing conditions to 2030 conditions with Ho'opili. However, table 5.3 shows "traffic impact" for only two of the morning segments and five of the afternoon segments. You arrive at this favorable "no-impact" designation by comparing "2030 with Ho'opili" only with "2030 without Ho'opili." Ho'opili is likely to begin construction before a number of other projects in the area, yet your action treats all other projects as if they come first. We request that the final EIS compare "existing conditions" with "2030 with Ho'opili" in determining traffic impact. Traffic impact status for four morning segments and seven afternoon segments seems warranted.

2. The "Chapter 7 Conclusion" on page 7-1 of your "Traffic Analysis Report" mentions intersections, concluding that, with mitigation, only one intersection will have "traffic impact." The Conclusion however, is seriously flawed in that it does not mention freeway segments at all, and ignores the "traffic impact" in the four morning segments and seven afternoon segments.

3. The Conclusion is further flawed in that it also does not mention unacceptable conditions for Ramp-Freeway Junction Operation, even though page 3-22 states that three in the morning and three in the afternoon are unacceptable, and Table 3.4 shows six of twenty Ramp Junctions for 2030 at LOS E or F. Mitigation for only one ramp is discussed at Impact 6.1.2F. The Conclusion for the final EIS should show "traffic impact" for six of the twenty Ramp Junctions.

4. The Conclusion seems further flawed in its assessment of impact on traffic intersections, both in that it presumes its lane-change mitigation measures will work, and in that it includes in mitigation efforts changes in habit by the population which have never been achieved before: such as carsharing, rent subsidies, and transit subsidies by employers. Given the concerted efforts of the DOT to ease traffic congestion through

creative re-striping and other changes over the last several years, it is questionable why the solutions proposed have not been adopted by the DOT if they so assuredly will work. We request that all mitigation proposals be discussed with the DOT and DTS and that their answers be recorded in the conclusion. Please comment on the feasibility of the state or city acting on each, and the cost. We request that the Conclusion restate the number of intersections which will have traffic impact in light of those conversations.

5. The Tables showing existing conditions, and Scenario A, year 2030 conditions without and with the project list volume, density and LOS, but do not show time spent in traffic. What are the times spent in traffic for the various sites? Please show current and 2030 Scenario A figures without and with the project.

6. The draft EIS only studies freeway segments as far east as the H-1/H-2 merge. Heavy traffic continues on into the city of Honolulu. This project will surely affect traffic all the way into town. We request that the final EIS contain studies of segments for the rest of the freeway.

7. The draft EIS discusses intersections and on/off ramps. In doing so, it combines all of the lanes of an intersection or ramp. While one lane may be an LOS F, it can be balanced off with a lane that is an A to make the intersection or ramp a C. Please make an additional, separate listing of all LOS E and F lanes so that they can easily be identified, and note the time backed up in each.

8. Moving to points not mentioned in the draft EIS: Ho'opili will occupy what can be pictured as a triangle, bordered on two sides by the two busiest roadways in West O'ahu. The tip of the triangle, where the two roadways converge, will continue to be the choke point for two roads. Both sides of one roadway, H-1, are open space for miles before the merge. There is a small number of homes (a few hundred) in West Loch, on one side of the other road, Ft. Weaver Rd. The many thousands of cars that feed into the H-1/H-2 Weaver merge at the tip of the triangle now pass this open space. When the 12,000 homes of Ho'opili fill the triangle, all of the homes of Ho'opili will be closer to the merge than any of the homes from which the thousands of cars now traveling the roads come. The 7069 cars from Ho'opili will empty onto Ft. Weaver and H-1 in front of the thousands of current travelers during peak hours each morning. The 12,077 cars returning to Ho'opili in the afternoon will slow the cars returning to farther distances. What effort is being made or will be made to inform those thousands of drivers, already enduring great traffic problems, that traffic from 12,000 homes will feed into the merge ahead of them? What efforts are being made or will be made to collect their input?

9. The draft EIS does not address the secondary and cumulative costs to drivers in physical health, mental health, loss of family time, and early death. What are these? What are the affects for latch-door kids? How much will the delay in traffic cause the people affected in child care? How much in gasoline? Please calculate these things for the entire trip to and from the city of Honolulu.

Agriculture:

"Appendix A, Agricultural Impact Analysis" discusses loss of agricultural lands, but does not discuss the nature of those lands. It also does not discuss the climate of the area which is an important factor in what plants can be grown.

The book, *Detailed Land Classification - Island of Oahu* Bulletin No. 11, December 1972 by the Land Study Bureau - University of Hawaii, classifies all lands on Oahu on a scale of A to E. Those classified as A and B are "prime agricultural lands." All of the flat land in the Ho'opihi project is classified as "prime agricultural lands." Much of it is classified as A. These lands are extremely rich. Climate is another factor. There are other "prime agricultural lands" which have not been covered with housing, but few exist in such a sunny area, with mild winds. These lands were called the golden triangle in sugar plantation days. We request that the final EIS study what other places on the island could be found which mimic the desirable conditions of the Ho'opihi lands. This would include a study of the best land and climate characteristics for growing the various crops that are being grown and have been grown on the property since sugar times.

Because of the high price of gasoline, two airlines that service Hawaii and one mainland airline declared bankruptcy and stopped flying this week. Experts tell us that the price of gasoline will never return to prices we have known in the past. Rather, with the emergence of automobiles in China and India, we can only expect higher and higher gasoline prices. Other airlines will eventually be forced into bankruptcy. And it may be necessary for Oahu to produce all the crops that feed our people. We request that the final EIS study this situation - specifically how much land at what land classifications (A to E) and under what climatic conditions (sun and wind) does Oahu need to sustain the anticipated 2030 number of people on the island. Further, please report in the EIS on the connection of gasoline price to and cost of shipping, and at what price the cost of gasoline will make it unfeasible to bring in food by air.

Water:

The several appendices on Water discuss a number of aspects--available potable and non-potable water, and drainage. There is no discussion on the aquifer itself and the effect housing, as opposed to current farmland, will have on water draining down to replenish the waters below. Although water seeps down only to the caprock in this area, rather than seeping down to refill the aquifer, the fresh water above the caprock is necessary to keep the salt water from flowing into the aquifer. We request that the final EIS present a study of this replenishment of fresh water to hold back the saltwater.

Rising seas also will bring seawater towards the aquifer. Lower brackish water above the caprock will allow the flooding of the clear water in the aquifer. We ask that the study of the water needed to hold back the seawater and the ways the water above the caprock can be replenished if the housing is build be included in the EIS.

Finally, this island has already reached its carrying capacity in regard to water. Thus the fear about the loss of brackish water from seepage in the Ho'opihi area. Charges for desalinated water will be higher than water from the aquifer. We request a study of water on O'ahu in general to establish that this project will not in any way move the island toward need for desalinated or otherwise reclaimed water..

Culture:

Appendix F of Volume 2 "Cultural Impact Assessment" spends roughly one hundred pages discussing ancient Hawaiian culture and concludes that "no contemporary or continuing cultural practices currently occur within the proposed Project Area.

Appendix F does not mention local culture, local lifestyle, or pidgin. The west side of the island over the last near-century has been the local people's side of the island. There has been a local culture practiced here for decades. Newcomers and new ways are a great threat to that culture.

On page 18 of Appendix K, under "In-Migrant Population," it is stated that 660 FTE part-time/second home buyers or off-island retirees will reside in Ho'opihi. That is roughly 5% of the 12,000 anticipated homes in Ho'opihi. This does not begin to match the reality in other new developments on the island.

We request that this study come up with realistic numbers for newcomers. And we request that an assessment the impact of these in-migrants on local culture be conducted.

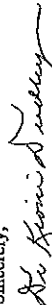
Tourism:

The EIS does not have a study of the effect of Ho'opihi on tourism. Surely, tourists come to Hawaii to see a lush tropical paradise. They do not expect to see urban sprawl covering the island. The green space between Waipahu and Kapolei (the area that will be covered by Ho'opihi) is a necessary break from urbanization and needs to be preserved. Without the break, tourists will find solid city from Hawaii Kai to Makaha.

The 'Ihialani, the Vacationclub timeshares, and the new Disney hotel at Ko 'Olina are basing publicity on "the other Hawaii." Tourists need the experience of seeing some country, some of the tropical green of paradise, as they drive to Ko 'Olina. Otherwise, it is no different from Waikiki, only further away.

We request that the final EIS have a study of the affect of the urbanization of this area on tourism, and that this study include interviews with prominent figures in tourism on Oahu.

Sincerely,



Dr. Kioni Dudley, Chairman



Dr. Kioni Dudley
 SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
 August 11, 2008
 Page 2

August 11, 2008

W. FRANK BRANDT, FLSIA
 Chairman

THOMAS WITENS, ASIA
 President

R. STANBINGAN, ASIA
 Executive Vice-President

RUSSELL CHUNG, ASIA
 Executive Vice-President

VINCENT SHIGEKUNI
 Vice-President

GRANT T. MURAKAMI, ACP
 President

TOM SCINILLI, ACP
 Senior Associate

RAYMOND THIG, ASIA
 Senior Associate

NYAN K. NISHIKAWA, ASIA
 Associate

KIMI MIKAMI FUEN, LEED AP
 Associate

SCOTT ALKA, AIBICO
 Associate

SKOTT MURAKAMI, ASIA
 Associate

HONOLULU OFFICE
 101 Bishop Street
 15th Floor, Suite 600
 Honolulu, HI 96813-5141
 Tel: (808) 531-8631
 Fax: (808) 531-4422
 E-mail: syvab@pbrhawaii.com

HILO OFFICE
 101 Aupua Street
 Hilo Lagoon Center, Suite 310
 Hilo, Hawaii 96720-4262
 Tel: (808) 935-1125
 Fax: (808) 935-3589

WAILUKU OFFICE
 101 Wailuku Street
 Wailuku, HI 96791-2771
 Tel: (808) 242-2828

Dr. Kioni Dudley, Chairman
 Leeward – Central Community Roundtable aka Leeward – Central Community Forum
 92-1365 Haione Street
 Kapolei, Hawaii 96707

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Dr. Dudley:

Thank you for your letter dated April 7, 2008. We have reviewed your letter and offer the following responses to your comments:

Traffic

Leeward – Central Community Roundtable Comment: Your report states on page 7 states that "traffic impact" will be indicated when an LOS deteriorates to B or worse. As the table shows, four of the five Honolulu-bound Morning segments and seven of the ten segments both ways in the Afternoon show such loss when comparing the existing conditions to 2030 conditions with Ho'opili. However, table 5.3 shows "traffic impact" for only two of the morning segments and five of the afternoon segments. You arrive at this favorable "no-impact" designation by comparing "2030 with Ho'opili" only with other projects in the area, yet your action treats all other projects as if they come first. We request that the final EIS compare "existing conditions" with "2030 with Ho'opili" in determining traffic impact. Traffic impact status for four morning segments and seven afternoon segments seems warranted.

Response: As requested, a new Table 4.13 (Comparison of Existing Traffic and Year 2030 Traffic With and Without the Project) will be added to the Final EIS.

Table 4.13. Comparison of Existing Traffic and Year 2030 Traffic With and Without the Project

MORNING PEAK		EXCLUDES RAIL		INCLUDES RAIL	
#	Freeway	Segment	Excluding LOS	2030 without Ho'opili	2030 with Ho'opili
1	H-1 EB	SGO Makaleia Dr.	A	E	E
2	H-1 EB	W/O Kuniia Rd.	C	F	F
3	H-1 EB	W/O Pihewa St.	E	E	E
4	H-1 EB	E/O Kamehameha	D	D	E
5	H-2 SB	ALKA - Uka Blvd.	D	D	D
6	H-1 WB	SGO Makaleia Dr.	A	C	C
7	H-1 WB	W/O Kuniia Rd.	C	C	C
8	H-1 WB	W/O Pihewa St.	C	B	C
9	H-1 WB	E/O Kamehameha	C	C	C
10	H-2 NB	ALKA - Uka Blvd.	B	C	C
AFTERNOON PEAK		EXCLUDES RAIL		INCLUDES RAIL	
#	Freeway	Segment	Excluding LOS	2030 without Ho'opili	2030 with Ho'opili
1	H-1 EB	SGO Makaleia Dr.	B	D	E
2	H-1 EB	W/O Kuniia Rd.	D	D	D
3	H-1 EB	W/O Pihewa St.	C	D	B
4	H-1 EB	E/O Kamehameha Hwy.	B	D	B
5	H-2 SB	ALKA - Uka Blvd.	B	C	C
6	H-1 WB	SGO Makaleia Dr.	B	F	F
7	H-1 WB	W/O Kuniia Rd.	C	E	F
8	H-1 WB	W/O Pihewa St.	E	C	D
9	H-1 WB	E/O Kamehameha Hwy.	E	E	F
10	H-2 NB	ALKA - Uka Blvd.	C	F	F

Source: Wilbur Smith Associates, Traffic Impact Analysis Report for Ho'opili (2007)

Leeward – Central Community Roundtable Comment: The “Chapter 7 Conclusion” on page 7-1 of your “Traffic Analysis Report” mentions intersections, concluding that with mitigation, only one intersection will have “traffic impact.” The Conclusion however, is seriously flawed in that it does not mention freeway segments at all, and ignores the “traffic impact” in the four morning segments and seven afternoon segments.

Response: A paragraph that describes the effects on freeway segments will be added to the Executive Summary as well as Chapter 7 (Conclusion) of a revised TIAR, which will be updated as part of the permitting process.

Leeward – Central Community Roundtable Comment: The Conclusion is further flawed in that it also does not mention unacceptable conditions for Ramp-Freeway Junction Operation, even though page 3-22 states that three in the morning and three in the afternoon are unacceptable, and Table 3.4 shows six of twenty Ramp Junctions for 2030 at LOS E or F. Mitigation for only one ramp is discussed at Impact 6.1.2F. The Conclusion for the final EIS should show “traffic impact” for six of the twenty Ramp Junctions.

Response: As suggested, a paragraph will be added to include a discussion on ramp-freeway junction operations to the Executive Summary as well as Chapter 7 (Conclusion) of a revised TIAR, which will be updated as part of the permitting process.

Leeward – Central Community Roundtable Comment: The Conclusion seems further flawed in its assessment of impact on traffic intersections, both in that it presumes its lane-change mitigation measures will work, and in that it includes in mitigation efforts changes in habit by the population which have never been achieved before: such as car sharing, rent subsidies, and transit subsidies by employers. Given the concerted efforts of the DOT to ease traffic congestion through creative re-striping and other changes over the last several years, it is questionable why the solutions proposed have not been adopted by the DOT if they so assuredly will work. We request that all mitigation proposals be discussed with the DOT and DTS and that their answers be recorded in the conclusion. Please comment on the feasibility of the state or city acting on each, and the cost. We request that the Conclusion restate the number of intersections which will have traffic impact in light of those conversations.

Response: As we understand your comments, it consists of two parts – 1) addressing the traffic impacts through additional or revised lanes at problem intersections, and 2) the feasibility of contra-flow lanes and other Transportation Demand Management (TDM) measures.

The traffic consultant believes that the proposed changes to the lane configurations at these intersections would mitigate the traffic impacts from the Ho'opili development at these anticipated “bottleneck” locations in the area roadway network. The additional lanes would increase capacity for critical traffic movements at each intersection and thereby increase overall intersection capacity and reduce much or all of the forecast additional delays that could otherwise result from the Ho'opili traffic.

The consultant identified the cited potential additional TDM measures and use of contra-flow lanes as additional actions for consideration beyond those that have been proposed for implementation and included in the analyses. The additional TDM actions do include some that have not previously been tried on Oahu and thus were suggested “for consideration” without including any substantial change in the Ho'opili traffic forecasts. The Petitioner will continue to work with the State DOT and City and County of Honolulu Department of Transportation Services (DTS) regarding the feasibility of implementing the various lane changes and TDM actions. The mitigations proposed in the TIAR will be discussed with the DOT and DTS and their answers will be recorded as requested.

Leeward – Central Community Roundtable Comment: The Tables showing existing conditions, and Scenario A, year 2030 conditions without and with the project list volume, density and LOS, but do not show time spent in traffic. What are the times spent in traffic for the various sites? Please show current and 2030 Scenario A figures without and with the project.

Response: The existing and future traffic conditions were analyzed using traffic models that assess conditions at individual key at-grade intersections and at freeway ramps in the Project vicinity. These particular models were used since the focus was to identify those locations that would be most affected by the increased traffic and to test potential roadway modifications to mitigate the significant adverse impacts of the Project. These models do provide an indication of the change in travel speeds/times through the individual analyzed intersections and freeway ramps, but do not provide an overall change in travel time through the corridor. The travel time information provided includes:

- **Key Intersections –** The Synchro model used in the study provides the estimated total vehicle delay on each roadway approach and for each traffic movement at the studied intersections. This vehicle delay represents the increased travel time in approaching and slowing for the intersection traffic control as well as the time spent in traffic queue waiting to pass through the intersection. The estimated delay by roadway approach can be found on the intersection worksheets for the existing, 2030 Baseline (without Project), and 2030 with Project scenarios in the Appendices of the Ho'opili TIAR prepared by Wilbur Smith Associates. Comparison of the delays at the intersection approaches along a roadway between the Without Project and With Project scenarios would provide a general approximation of the change in travel time along a route.
- **Freeway Ramps –** The Highway Capacity Software (HCS) used to analyze the ramp junctions with the Freeway mainline lanes provides the estimated change in traffic speeds for the through freeway traffic and for the ramp traffic along the merging or diverging areas for the key on- and off-ramps providing the Project traffic access to/from the Ho'opili Freeway. However, the analysis output does not provide information to directly estimate changes in travel time along a route between scenarios since these speeds apply only to freeway section in the vicinity of the ramp junction.

Dr. Kioni Dudley
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 5

As the Ho'opili Project progresses through additional studies for the City and County of Honolulu zoning review process, consideration will be given to the use of additional or revised models that could provide travel time estimates.

Leeward – Central Community Roundtable Comment: The draft EIS only studies freeway segments as far east as the H-1/H-2 merge. Heavy traffic continues on into the city of Honolulu. This project will surely affect traffic all the way into town. We request that the final EIS contain studies of segments for the rest of the freeway.

Response: The Oahu Metropolitan Planning Organization (OMPO) regional model used to develop the traffic forecasts takes into account the H-1/H-2 merge. The TIAR is compatible with the regional land use assumptions as part of the master land use plan. These assumptions are reflected in the traffic forecasts developed for this study. We believe the methodology used to prepare the TIAR is consistent with sound traffic engineering practice.

Leeward – Central Community Roundtable Comment: The draft EIS discusses intersections and on/off ramps. In doing so, it combines all of the lanes of an intersection or ramp. While one lane may be an LOS F, it can be balanced off with a lane that is an A to make the intersection or ramp a C. Please make an additional, separate listing of all LOS B and F lanes so that they can easily be identified, and note the time backed up in each.

Response: This information is presented in worksheets in Appendix A. Signal timings for the intersections analyzed under Year 2030 conditions have been optimized based on the traffic volumes in the forecast. The Synchro output worksheets show the level of service (LOS) outputs for the entire intersection as well as for each lane group as requested.

Leeward – Central Community Roundtable Comment: Moving to points not mentioned in the draft EIS: Ho'opili will occupy what can be pictured as a triangle, bordered on two sides by the two busiest roadways in West O'ahu. The tip of the triangle, where the two roadways converge, will continue to be the choke point for two roads. Both sides of one roadway, H-1, are open space for miles before the merge. There is a small number of homes (a few hundred) in West Loch, on one side of the other road, Ft. Weaver Rd. The many thousands of cars that feed into the H-1/H-2 merge at the tip of the triangle now pass this open space. When the 12,000 homes of Ho'opili fill the triangle, all of the homes of Ho'opili will be closer to the merge than any of the homes from which the thousands of cars now traveling the roads come. The 7069 cars from Ho'opili will empty onto Ft. Weaver and H-1 in front of the thousands of current travelers during peak hours each morning. The 12,077 cars returning to Ho'opili in the afternoon will slow the cars returning to further distances. What effort is being made or will be made to inform those thousands of drivers, already enduring great traffic problems, that traffic from 12,000 homes will feed into the merge ahead of them? What efforts are being made or will be made to collect their input?

Response: For the morning peak hour, this comment can be addressed by modifying the apportionment of green time at these critical intersections such that the flow of traffic from Ho'opili onto the H-1 freeway is metered. Modification of signal timings or lanes will depend

Dr. Kioni Dudley
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 6

on the policies and operations that the City and County of Honolulu and the State DOT adopt for signals along Fort Weaver Road.

For the afternoon peak hour, it will be harder to ascertain whether the traffic composition is mostly people commuting to Ho'opili or not. Hence, any penalties directed towards people commuting to Ho'opili might adversely affect other commuters as well.

Leeward – Central Community Roundtable Comment: The draft EIS does not address the secondary and cumulative costs to drivers in physical health, mental health, loss of family time, and early death. What are these? What are the affects for latch-door kids? How much will the delay in traffic cause the people affected in child care? How much in gasoline? Please calculate these things for the entire trip to and from the city of Honolulu.

Response: As noted in the Draft EIS Volume 2, a discussion of the secondary and cumulative impacts of the project on residents can be found in *Chapter Four: Impacts and Mitigations* of the Social Impact Assessment prepared by Belt Collins Hawaii Ltd. (November 2007). This report was appended to the Draft EIS as Appendix I. A letter clarifying the existing text is included in Appendix I and is underlined below. Among the conclusions reached in this report are:

Ho'opili has been planned with the reduction of traffic impacts in mind. First, it includes transit-oriented development. Bus lines have been identified to encourage residents throughout the project to use rapid transit or to use buses or bicycles within the project area. Street sizes and connectivity will encourage pedestrian and bicycle movement. To the extent that automobile use declines (or Ho'opili attracts new residents who are less committed to automobile use than others), residents can expect to have more exercise, and be healthier than people in other subdivisions of Leeward Oahu...

Ho'opili will contribute to the growth of the urban community life in Ewa by providing new job locations, recreational areas, and schools as well as housing. It is designed as a community in which many residents will not need to drive to Honolulu often. Its transportation planning will work to address the region's serious traffic congestion problems. It will help to link existing and new communities, serving its neighbors as well as its residents.

The above paragraphs will be added to page xi in the Executive Summary of the Final EIS. In sum, your concern with the impacts of traffic congestion is understandable. We share it. Ho'opili has been planned to minimize or avoid adverse traffic impacts and consequent social impacts.

AGRICULTURE

Leeward – Central Community Roundtable Comment: "Appendix A, Agricultural Impact Analysis" discusses loss of agricultural lands, but does not discuss the nature of those lands. It also does not discuss the climate of the area which is an important factor in what plants can be grown.

Response: The "nature of those lands" were described in *Hoopili: Impact on Agriculture* (Appendix A of the Draft EIS Volume 2) on pages 2 through 16, including: soil types; various Federal and State soil ratings; soil characteristics; summary of arable land; elevations; terrain; climatic conditions (solar radiation, rainfall, temperature, winds and storms); irrigation water; road access; potential crops; locational advantages and disadvantages for crop production; surrounding land uses; historic agricultural uses; and existing agricultural operations.

Leeward - Central Community Roundtable Comment: The book, *Detailed Land Classification* — Island of Oahu Bulletin No. 11, December 1972 by the Land Study Bureau — University of Hawaii, classifies all lands on Oahu on a scale of A to E. Those classified as A and B are "prime agricultural lands." All of the flat land in the Ho'opili project is classified as "prime agricultural lands." Much of it is classified as A. These lands are extremely rich. Climate is another factor. There are other "prime agricultural lands" which have not been covered with housing, but few exist in such a sunny area, with mild winds. These lands were called the golden triangle in sugar plantation days. We request that the final EIS study what other places on the island could be found which mimic the desirable conditions of the Ho'opili lands. This would include a study of the best land and climate characteristics for growing the various crops that are being grown and have been grown on the property since sugar times.

Response: If the question being posed is: "are there any lands which are exactly like the Petition Area?" then the answer would be that there are no other lands on Oahu with similar soils and climatic conditions other than the soils underlying the proposed UHWO and DHHL East Kapolei projects. As described in *Hoopili: Impact on Agriculture* (Appendix A of the Draft EIS Volume 2), the soils underlying the Petition Area are suited for low-elevation crops. While portions of the Petition Area may have been referred to as the "Golden Triangle" because of higher sugar yields than other lands cultivated for sugar cane, one cannot construe that all crops grown in the Golden Triangle would necessarily gross the highest yields.

Hoopili: Impact on Agriculture (Appendix A of the Draft EIS Volume 2) identifies a total of 10,900 acres of former plantation land remaining on Oahu which are available for other crops, including 3,150 acres of former pineapple land in Kunia and 7,750 acres on the North Shore. It is acknowledged that some of the higher elevation fields in Kunia and on the North Shore have less solar radiation than Ewa and lands in higher elevations incur higher pumping costs. Nevertheless, some limitations can be overcome with investment in improvements such as to existing water delivery systems.

Leeward - Central Community Roundtable Comment: Because of the high price of gasoline, two airlines that service Hawaii and one mainland airline declared bankruptcy and stopped flying this week. Experts tell us that the price of gasoline will never return to prices we have known in the past. Rather, with the emergence of automobiles in China and India, we can only expect higher and higher gasoline prices. Other airlines will eventually be forced into bankruptcy. And it may be necessary for Oahu to produce all the crops that feed our people. We request that the final EIS study this situation — specifically how much land at what land classifications (A to B) and under what climatic conditions (sun and wind) does Oahu need to sustain the anticipated 2030 number of people on the island. Further, please report in the EIS on the connection of

gasoline price to and cost of shipping, and at what price the cost of gasoline will make it unfeasible to bring in food by air.

Response: While we would concur that rising fuel and transportation costs are of concern, it is interesting to note that Mauna Kea Banana Company recently announced it was ending its banana production citing rising fertilizer and energy costs. So the opposite result from what you are anticipating may actually be occurring.

Water

Leeward - Central Community Roundtable Comment: The several appendices on Water discuss a number of aspects—available potable and non-potable water, and drainages. There is no discussion on the aquifer itself and the effect housing, as opposed to current farmland, will have on water draining down to replenish the waters below. Although water seeps down only to the caprock in this area, rather than seeping down to refill the aquifer, the fresh water above the caprock is necessary to keep the salt water from flowing into the aquifer. We request that the final EIS present a study of this replenishment of fresh water to hold back the saltwater.

Rising seas also will bring seawater towards the aquifer. Lower brackish water above the caprock will allow the flooding of the clear water in the aquifer. We ask that the study of the water needed to hold back the seawater and the ways the water above the caprock can be replenished if the housing is build be included in the EIS.

Finally, this island has already reached its carrying capacity in regard to water. Thus the fear about the loss of brackish water from seepage in the Ho'opili area. Charges for desalinated water will be higher than water from the aquifer. We request a study of water on O'ahu in general to establish that this project will not in any way move the island toward need for desalinated or otherwise reclaimed water.

Response: Per your comments, we have consulted with Tom Nance Water Resource Engineering and we will revise the first paragraph of Section 3.5 *Groundwater Resources/Hydrology, Existing Conditions* of the Final EIS as follows:

The Ewa region of O'ahu overlies the Southern O'ahu Basin Aquifer (SOBA), a designated Sole Source Aquifer. Drinking water supply is drawn from this aquifer in the volcanic formation at depth. According to Tom Nance Water Resource Engineering, the piezometric head of this aquifer, which is inland and directly beneath the Ho'opili site, is about 18 feet above sea level.

The gently sloping topography of the Ewa Plain is comprised of terrestrial alluvium, which is made up of clay and mud eroded from volcanic rock. The terrestrial alluvium is inter-layered with coral limestone deposited during periods when the area was covered by the ocean. This geologic feature is commonly referred to as "caprock." The caprock overlies these volcanics to the near vicinity of Farrington Highway. In cross section, the caprock is wedge-shaped. It is about 1,000 feet thick at the shoreline and tapers to just a few tens of feet thick in the vicinity of Farrington Highway. It is comprised primarily of

limestone and marl on its seaward half (makai of OR&L Railroad right-of-way) and primarily terrestrial alluvium inland of the OR&L Railroad right-of-way. The caprock is located makai of the H-1 Freeway and is approximately 1,000 feet thick near the shoreline.

Brackish to saline basal groundwater exists in the upper limestone layer of the caprock. According to Tom Nance Water Resource Engineering, its water level is 1.0 to 1.5 feet above sea level. It is referred to as the caprock aquifer, but it is not present through the entire caprock formation. It is limited to the upper limestone layer. All water in the caprock formation below the thin lens in the upper limestone layer is saltwater. Water in the caprock is too saline to be used for safe drinking water.

Leakage upward from the higher head, volcanic aquifer into the caprock formation does occur, but according to Tom Nance Water Resource Engineering, it is limited to the inland margin of the caprock. This rate of upward leakage is a function of geology and the piezometric head in the volcanics. It is not influenced by the much lower water level in the upper limestone layer of the caprock.

The current irrigation allocation for the Petition Area is 8.0 million gallons per day (MGD). The average irrigation use is approximately 2.0 to 3.0 million gallons per day (MGD), depending on the time of the year.

We will also revise the first paragraph of Section 3.5 Groundwater Resources/Hydrology, Anticipated Impacts and Mitigation Measures of the Final EIS as follows:

The total average daily source requirement for ultimate build-out is estimated at 3.9 MGD. The present agricultural use of the Petition Area provides recharge to the alluvial portion of the caprock from excess applied irrigation water. This irrigation return eventually moves into the aquifer in the upper limestone layer of the caprock, becoming a portion of its recharge, albeit a relatively small portion. According to Tom Nance Water Resource Engineering, development of the Ho'opili project will diminish this small component of the recharge to some extent, but will have an immeasurable impact on water level in the upper limestone layer.

The project is not expected to impact groundwater resources, as the caprock acts as a barrier to the drinking water in the Petition Area. The caprock in 'Ewa around Pearl Harbor, and in Honolulu, does function to retard seawater intrusion into the drinking water aquifer in the volcanics. According to Tom Nance Water Resource Engineering, it is an incredibly important contribution to the availability of drinking water which comes about due to the mostly impermeable contact surface between the volcanics and the overlying caprock. It is not due to the water level in the caprock.

Both the drinking water aquifer in the volcanics and the brackish to saline aquifer in the caprock's upper limestone layer are in hydraulic contact with seawater nearshore and offshore. Sea level changes, whether weeks or months long due to large scale weather phenomena in the Pacific or a longer term sea level rise, does cause both aquifers to rise

or fall accordingly. According to Tom Nance Water Resource Engineering, the Ho'opili project will have no impact on sea level changes.

Although the Petition Area is situated makai of the UIC line, no injection wells or cesspools will be installed (since the project's wastewater collection system will eventually connect to the Honolulu Wastewater Treatment Facility), and any runoff or wastewater disposal required for the project will be managed in full compliance with State Department of Health (DOH) regulations. Irrigation for landscaping will utilize brackish water from the 'Ewa caprock and/or treated effluent (R-1 quality) from the City and County of Honolulu's Honolulu Wastewater Treatment Facility (if available) to facilitate the recharge of caprock water and to reduce the demand for safe drinking water from the BWS system.

Probably like any other region where a directed growth policy is in place, O'ahu has a finite supply of potable quality groundwater, meaning development using additional groundwater will eventually result in the need for desalination. The proposed project is not unique in this regard. BWS has long range plans to develop a desalination plant at the makai end of Campbell Industrial Park to ultimately meet the island's needs.

Culture

Leeward - Central Community Roundtable Comment: Appendix F of Volume 2 "Cultural Impact Assessment" spends roughly one hundred pages discussing ancient Hawaiian culture and concludes that "no contemporary or continuing cultural practices currently occur within the proposed Project Area.

Appendix F does not mention local culture, local lifestyle, or pidgin. The west side of the island over the last near-century has been the local people's side of the island. There has been a local culture practiced here for decades. Newcomers and new ways are a great threat to that culture.

Response: We acknowledge your concern that the Cultural Impact Assessment does not mention local culture, local lifestyle, or pidgin. However, the guidelines set forth in the Cultural Impact Assessment were designed to fulfill the mandate to the Land Use Commission from the Hawai'i State Supreme Court in its ruling, *Ka Pa'akai O Ka 'Aina v. Land Use Commission, State of Hawai'i*, 94 Haw. 31 (2000). The specific section of the ruling that served to guide the development of the report is as follows:

In order for the rights of native Hawaiians to be enforceable, an appropriate analytical framework for enforcement is needed. Such an analytical framework must endeavor to accommodate the competing interests of protecting native Hawaiian culture and rights on the one hand, and economic development and security, on the other.

As such, the Cultural Impact Assessment is founded on the native Hawaiian traditions, customs and practices, rather than the local culture, lifestyle and language in general.

Dr. Kioni Dudley
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 11

Leeward - Central Community Roundtable Comment: On page 18 of Appendix K, under "In-Migrant Population," it is stated that 660 FTE part-time/second home buyers or off-island retirees will reside in Ho'opili. That is roughly 5% of the 12,000 anticipated homes in Ho'opili. This does not begin to match the reality in other new developments on the island.

We request that this study come up with realistic numbers for newcomers. And we request that an assessment the impact of these in-migrants on local culture be conducted.

Response: The 660 in-migrants reflect Mikiko Corporation's projection of part-time resident or retiree households that might settle in Ho'opili, who have previously lived off-island. In addition, the Mikiko Corporation study estimates that approximately 2,170 persons could settle on O'ahu, at Ho'opili or elsewhere, due to employment opportunities generated by the development and operations of Ho'opili. Thus, the project's total population impact for O'ahu is estimated at 2,830 persons. This was addressed on pages 19 - 20 and 39 of the *Economic and Fiscal Impact Assessment for Ho'opili* (Appendix K of DEIS Volume II).

The City and County of Honolulu's affordable housing guidelines require that some 30% of the units at Ho'opili be occupied by primary residents. The projected 660 in-migrants to O'ahu is a full-time equivalent (FTE) population estimate based on 7% of the other 70% of units at the Project that would be sold as market-priced units. Thus, some 7% of sold market units at the Project are estimated to be used as part-time or retirement residences for persons who previously lived off-island. The population projection also assumes an average 50% occupancy on such units (6 months of any given year), and an estimated 2.3 persons per occupied unit. These usage factors are considered potentially generous, given established patterns of part-time occupancy elsewhere in the State, and the location and nature of Ho'opili.

Ho'opili is not planned to offer the infrastructure that tends to attract part-time residents or retirees from off-island. It will have no golf course and no resort amenities; neither does the site doers offer ocean access or views. Rather, Ho'opili is planned as a primary residential mixed-use community that will offer significant jobs within and near to the Project itself.

Tourism

Leeward - Central Community Roundtable Comment: The EIS does not have a study of the effect of Ho'opili on tourism. Surely, tourists come to Hawaii to see a lush tropical paradise. They do not expect to see urban sprawl covering the island. The green space between Waipahu and Kapolei (the area that will be covered by Ho'opili) is a necessary break from urbanization and needs to be preserved. Without the break, tourists will find solid city from Hawaii Kai to Makaha.

The 'Ihiani, the Vacationclub timeshares, and the new Disney hotel at Ko 'Olina are basing publicity on "the other Hawaii." Tourists need the experience of seeing some country, some of the tropical green of paradise, as they drive to Ko 'Olina. Otherwise, it is no different from Waikiki, only further away.

Dr. Kioni Dudley
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 12

We request that the final BIS [EIS] have a study of the affect of the urbanization of this area on tourism, and that this study include interviews with prominent figures in tourism on Oahu.

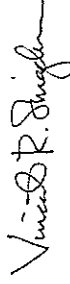
Response: You raise an interesting issue. Currently, views from Ko 'Olina towards Diamond Head yield views of Campbell Industrial Park; views towards Wai'anae, yield views of Kahe Power Plant; and views towards mauka, yield views of Honokai Hale. All of the surrounding urban developments were in place before Ko 'Olina was proposed. Development in East Kapolei (encompassing Ho'opili) and Ko 'Olina has long been a part of the "Campbell Estate Ewa Master Plan." We acknowledge your concern regarding the effect urbanization may have on tourism, however this area has been slated for future development and is within the Urban Growth Boundary in the Ewa Development Plan. As such, we believe that a study regarding the effect of Ho'opili on tourism is not warranted.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\en\2152603.01 DR Honor-E Kapolei\EIS\Final EIS\Final EIS Response Letters\BL-22 Dudley Responses.doc

March 27, 2008

DR Horton- Schuler Division
828 Fort Street Mall, 4th Floor
Honolulu, Hawaii 96813

Contact: Dean Uchida

Dear Applicant,

RE: HOOPILI MASTER PLANNED MIXED USE COMMUNITY

COMMENT ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)


THE EAST WEST CONNECTOR ROAD SHOULD BE MANDATED AS A REQUISITE TO BE COMPLETED AND OPEN FOR PUBLIC USE PRIOR TO PERMITTING THE ADDITION OF HOUSING DEVELOPMENT TO OCCUR ON THE PROJECT.

I AM FOR THE DEVELOPMENT OF THE PROPERTY AND SUPPORT THE RENDERINGS SO FAR PROVIDED BY THE APPLICANT TO ADORN THE LANDSCAPE.

HOWEVER, TO APPROVE OF THE DEVELOPMENT SCHEME WITHOUT A TIMELINE, WITHOUT A DEADLINE, WITHOUT A PLAN TO CONSTRUCT THE EAST WEST ROAD SOONER THAN LATER, WOULD BE AN ERRANT ACT.

FURTHERMORE, SINCE THE EAST WEST ROAD WILL BE COMPLETED BY THE YEAR 2015 IN ALL OTHER JURISDICTIONS WHERE THE ROAD PASSES THROUGH, SUCH THOROUGHFARE WILL NOT BE AVAILABLE TO SERVE THE EWA BEACH RESIDENTS UNLESS THE APPLICANT COMPLETES THEIR PORTION ASSIGNED TO THEM.

PLEASE PLACE CONDITIONS UPON THE APPLICANT TO BUILD THE EAST WEST CONNECTOR ROAD PRIOR TO AUTHORIZING OR ADVANCING ANY OTHER TYPE OF DEVELOPMENT THAT IS NOT RELATED TO THE ROAD'S CONSTRUCTION.

Respectfully,

Tom Berg
91-203 Hanapouli Circle
Ewa Beach, Hawaii 96706

Cc: State Land Use Commission/Anthony Ching
PBR, Hawaii/Vincent Slingekuni
Office of Environmental Quality Control



August 11, 2008

W. FRANK RANDI, EAALA
Chairman

THOMAS WITLES, ASLA
President

R. STANFORD, ASLA
Executive Vice-President

RUSSELL CHUNG, FASLA
Executive Vice-President

VINCENT SHERKUN
Vice-President

GRANT LAURAKAM, AICP
Principal

TOM SCHINTEL, AICP
Senior Associate

KAYMOND T. HIGA, ASLA
Senior Associate

ALVIN K. NISHIKAWA, ASLA
Associate

KIMIKAWA YVES, LEED AP
Associate

SCOTT AIKUA ABRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1031 Bishop Street
ASB Tower, Suite 1650
Honolulu, Hawaii 96813-2484
Tel: (808) 551-5641
Fax: (808) 551-1883
E-mail: planning@pbrhawaii.com

HILO OFFICE
1001 Kapaemahu Dr.
1001 Kapaemahu, Suite 210
Hilo, Hawaii 96720-2522
Tel: (808) 963-2223
Fax: (808) 963-1059

WAILUKU OFFICE
1287 Wai Lu Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2623

Mr. Tom Berg
91-203 Hanapouli Circle
Ewa Beach, Hawaii 96706

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Berg:

Thank you for your letter dated March 27, 2008. We have reviewed your letter and offer the following response to your comments.

There are several major transportation projects that have been long-planned for Ewa. The Ho'opili project has been planned assuming that certain planned transportation projects will be constructed including a portion of North-South Road between Farrington Highway and Kapolei Parkway; a portion of the North-South Road and a new H-1 Freeway interchange; a portion of the intersection of North-South Road and Farrington Highway; the long-planned widening of Farrington Highway fronting Ho'opili; the proposed East-West Connector Road (EWCR) through the Petition Area; and the first segment of the proposed Honolulu High-Capacity Transit Corridor project through the Petition Area.

We are appreciative of your support for the development of the subject property and acknowledge your concern regarding the timing of the construction of the proposed East-West Connector Road. Please note that: 1) Ho'opili has been designed to accommodate an alignment for the EWCR; and 2) DHHL and UHWO will be starting development well before Ho'opili. Please note that the Petitioner, along with DHHL and UHWO, has submitted a letter to the City and County of Honolulu, Department of Planning and Permitting requesting that the EWCR be included in an updated list of projects to be funded under the Ewa Highway Master Plan (Section 33A-1.6(h) of the Revised Ordinances of Honolulu).

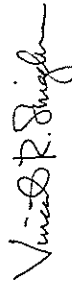
Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

Mr. Tom Berg
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\02202\203 01 DR. Horton-E Kapolei\EIS\Final EIS\Final EIS Response Letter\BL-09 Beg Response.doc

PBR Hawaii & Associates Inc.
1001 Bishop Street
ASB Tower 650
Honolulu, Hawaii 96813
Fax: 523-1402
Attention: Vincent Shigekuni

Dear Mr. Shigekuni:

SUBJECT: Draft Environmental Impact Statement for the Ho'opili Project
Ewa, O'ahu, Hawaii

Thank you for the opportunity to review and provide comment. I wanted to compliment D.R. Horton's team for a comprehensive draft environmental impact statement. Their commitment of engaging the community in the planning process is highly regarded. Connectivity, infrastructure, transit-oriented-development, and job creation are all important issues to the Ewa region. The draft identifies and covers all these issues sufficiently. I believe the Ho'opili project encompasses all the elements necessary for a vibrant work, live, learn, and play community.

My concerns are not about the plan, but the execution of the plan. As the past developments have demonstrated along the Ewa plain, the developers have very little influence over the government agencies responsible for building the roads, schools, parks, infrastructure, etc. Gentry and Haseko have built beautiful communities and where they were responsible for the infrastructure and roads the projects are sufficient. But, the city and state road projects sat idle all the while the populations exploded and now the community faces 2 hour commute times to get into town and back. I believe our community has learned from the past and we are calling for the Ho'opili project to be a leader in development.

Ho'opili has an opportunity to incorporate all the learning and wisdom of past developments. Unconventionally, they can ensure that infrastructure, roads, and job creation centers be built before residential units. Focus on constructing connectivity projects, infrastructure, parks, and schools prior to homes. This type of construction execution will provide relief for existing communities. As a sample, Haseko and Gentry completed their portions of Kapolei Parkway which improved circulation within the communities. Though we are still waiting for city's portion of Kapolei Parkway and the state's North-South Road the completion of the developer's portions of Kapolei Parkway has relieved congestion on Ft. Weaver Road.

I realize the financial investment is costly, but our community has suffered long enough. We are counting on the State Land Use Commission to uphold this community expectation.

Sincerely,

Tesha H. Malama
91-818 Lawalu Pl,
Ewa Beach, HI 96706
Tesha96706@yahoo.com or 689-0908.

cc: State of Hawaii Land Use Commission



August 11, 2008

W. FRANK IRANDEANSLA
Chairman

THOMAS WITTEN, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

KUNILLI H. CHUNG, ASLA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT T. AURAKAHI, AICP
Principal

TOM SCHNELL, AICP
Senior Associate

RAMONDT. HIGA, ASLA
Senior Associate

KAYIN K. NISHIKAWA, ASLA
Associate

KIMIKAWA YUEN, LEED AP
Associate

SCOTT AUKA ABBEGO
Associate

SCOTT AURAKAHI, ASLA
Associate

HONOLULU OFFICE
1601 Bishop Street
ASR Tower, Suite 650
Honolulu, Hawaii 96813-3441
Tel: (808) 533-1441
E-mail: pps@hawaii.pbrhawaii.com

HILLO OFFICE
1105
Hilo Laguna Center, Suite 810
Hilo, Hawaii 96720-9262
Tel: (808) 961-3333
Fax: (808) 961-5969

WAILUKU OFFICE
1257 Wai'oli Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2676

PBR Hawaii
ASB Tower, Suite 650
1601 Bishop Street
Honolulu, HI 96813

Vincent Shigekuni

Dear Mr. Shigekuni,

The purpose of this letter is to express my comments on the Ho'opili Draft Environmental Impact Statement that was published in February 2008. As an introduction, I am generally dismayed by the lack of thorough environmental review in this document and I feel that it is not consistent with the intent or spirit of Hawaii's environmental laws. The size of this project requires a full analysis that looks at real alternatives and a wide range of impacts. This document does neither.

My first issue relates to the expected period of development for the project. The estimated completion of 2030 would seem to be at odds with the Land Use Commission's rules related to incremental districting that require substantial completion of the full development of the project within ten years. I did not come across an incremental development plan for the project in the EIS as the rules seem to require. Given this inadequacy and the likely inability to build all of those homes within ten years, it seems at most only a portion of the project should be redistricted out of agriculture to urban at this time and that the most productive agricultural land should not become urban.

My second issue relates to the project's consistency with the rest of Oahu's regional planning. Section 5 of the EIS makes no mention of why such intense urban development is planned in the "urban fringe" areas of Ewa as described in the Oahu General Plan. In fact, this project is outside of the "Secondary Urban Center" as shown in the General Plan where intense urban growth should be directed to minimize sprawl. The Ewa Development Plan describes the project area as residential and within an urban growth boundary, however it makes no mention of the amount of commercial and industrial development described in the project's EIS. As such, General Plan and Ewa Development amendments should be sought for this project so that the island has the chance to debate the level of growth appropriate for these types of undeveloped lands. This is especially necessary since the City is pushing to designate transit stops within the project area which seems like an effort to undermine the authority of the Land Use Commission and permit the project prior to it going through the necessary reviews.

The EIS also uses a desired jobs to housing balance presumably to downplay the substantial traffic impacts of over 160,000 new vehicles on the road per day. Looking at traffic impacts with a "with transit" condition is misleading as it doesn't speak to the likely potential that the train from Waipahu to the project will be expanded during the time it takes to build the project's homes. Also, I just can't see how the creation of only 680 net new jobs in any way justifies the 11, 750 homes planned for the project.

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Malama:

Thank you for your letter regarding the Ho'opili Draft EIS. We greatly appreciate the comments on the comprehensiveness of the DEIS, the public engagement process and the project master plan. We have reviewed your letter and offer the following response to your comments.

We acknowledge your concerns regarding the execution of the plan regarding the construction of roads, schools, parks, infrastructure, etc. The Petitioner will continue to coordinate with State and City agencies to ensure that the necessary infrastructure is constructed in a timely manner.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement.

If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

0A06252503.01 DR Horton-E KaipoLEIISFinal EISFinal Response LettersARL-15 Tesha Malama Response.doc



August 11, 2008

W. ERAN BRANDI, JANA
Chairman

THOMAS S. WHITENASIA
President

R. STAN DUNCAN, ANA
Executive Vice-President

RUSSELL Y. CHUNG, PASIA
Executive Vice-President

VINCENT SHERGENUS
Vice-President

GRANT M. MUKAKAMA, ANCP
Principal

TOM MACHILL, ANCP
Senior Associate

RAYMOND L. IJIGA, ANIA
Senior Associate

KEVIN S. NISHIKAWA, ANIA
Associate

KIM SUK-KAHN YUEN, LEID, AP
Associate

SCOTT TALIKIA, ANIBGO
Associate

SCOTT MUKAKAMA, ANIA
Associate

HONOLULU OFFICE
1001 Kalia Road, Suite 150
Honolulu, Hawaii 96813-3384
Tel: (808) 521-2633
Fax: (808) 521-1402
E-mail: spokane@pbrhawaii.com

HILO OFFICE
100 August Street
Hilo, Hawaii 96720-5024
Tel: (808) 960-3323
Fax: (808) 960-4957

WAILUKU OFFICE
1757 Wai Hala Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2878

In conclusion, I feel there is much more study needed for this EIS document to be deemed complete. Detailed soils and past agricultural production studies are needed to determine what land should be ruled out of this redistricting as I hope the project area will downsize. In addition, more detailed studies on traffic impacts along the H-1 Freeway are needed to understand whether the island has the capacity to absorb those 160,000 cars. Additional study is also needed to assess the regional capacities that will likely be strained by this project. I am particularly concerned about current water sources which will have long dried up by 2030.

The alternatives to the project discussed in Section 6 are woefully inadequate. How can alternatives honestly be evaluated with less than one page of available material each and without any comparable studies to back up the assertions made?

I hope there are many more government reviews to evaluate this project if it remains in its current form. In addition to the added City processed I mention in this letter, I feel an intervention with the Land Use Commission is necessary to downsize this project and to make sure that someone identifies that the County is currently setting the stage for development by identifying transit stops before the Commission has had a chance to deliberate.

Sincerely,

Agnes Patopan, Esq.
98 Koaauka Loop
Aiea, HI 96701

Copies to Rodney Maile, Acting Director
State of Hawaii Land Use Commission
Henry Eng, Director
City and County of Honolulu Department of Planning and Permitting

SUBJECT: HO'OPII DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Patopan:

Thank you for your letter. We have reviewed your letter and offer the following responses:

Ms. Patopan's Comment: The purpose of this letter is to express my comments on the Ho'opili Draft Environmental Impact Statement that was published in February 2008. As an introduction, I am generally dismayed by the lack of thorough environmental review in this document and I feel that it is *not* consistent with the intent or spirit of Hawaii's environmental laws. The size of this project requires a full analysis that looks at real alternatives and a wide range of impacts. This document does neither.

Response: We acknowledge your concerns about the document and will be revising the EIS, where necessary. We hope our responses and revisions will address the concerns you specify in the rest of your letter.

Ms. Patopan's Comment: My first issue relates to the expected period of development for the project. The estimated completion of 2030 would seem to be at odds with the Land Use Commission's rules related to incremental districting that require substantial completion of the fill development of the project within ten years. I did not come across an incremental development plan for the project in the EIS as the rules seem to require. Given this inadequacy and the likely inability to build all of those homes within ten years, it seems at most only a portion of the project should be redistricted out of agriculture to urban at this time and that the most productive agricultural land should not become urban.

Response: As requested, the preliminary phasing and timing of the proposed project will be provided in the Final EIS. Section 2.7 *Development Timetable and Preliminary Costs* of the Final EIS will be revised as follows:

The Petitioner estimates that the development of the Ho'opili project (major off-site and on-site infrastructure improvements including grading, drainage, sewer, safe-drinking water, non-potable water, roadways, landscaping and improvements to Farrington Highway and North-South Road for access) will cost approximately \$4.6 billion (in Year 2007 dollars), spent over the project timeline of 2009 – 2030. During the public review period, both the Land Use Commission and the State Office of Planning made reference to subsection 15-15-50, Hawaii Administrative Rules (HAR), Subsection 15-15-50, HAR identifies the form and contents of a petition to the State Land Use Commission to amend the State Land Use District Boundaries, including representing "...that development of the subject property in accordance with the demonstrated need therefore, will be accomplished before ten years after the date of commission approval. In the event full urban development cannot substantially be completed within such period, the petitioner shall also submit a schedule for development of the total of such project in increments together with a map identifying the location of such increment, each such increment to be completed within no more than a ten-year period." The construction of Ho'opili's development will be a challenging process that will require ongoing coordination between many fundamental parts. Infrastructure and road access, neighboring property development, demands of the commercial and housing markets, careful continued agriculture and general property management, and economic viability will all be considered throughout the construction planning process. Furthermore, the City & County of Honolulu's (City) transit project, the largest public works endeavor in Hawaii's history, will within Ho'opili have its longest traverse through privately owned property and further, expand development challenges undoubtedly in unprecedented ways. Many of these parts may involve developing different areas of the project site within the same construction timetable as discussed further below.

Several major development priorities include in no particular order:

- Water Service from the North. Both of Ho'opili's main potable water storage and transmission systems will reside mauka of H-1. Considerable investment will be required in the construction of tanks and transmission lines that will ultimately service two water zones within Ho'opili that roughly abide the site between northern and southern halves. (Necessary offsite utility easements have already been secured at a price.) Nonpotable water will be sourced from the reclamation operations at the Honolulu Wastewater Treatment Plant (WVTP), meaning it will be delivered to Ho'opili from the opposite end from where its potable source will come. Preliminary budgetary construction cost estimates range from between \$35 million to \$40 million with another \$20 million possible from BWS for service connections.

- Sewer Service from the South. Unlike Ho'opili's main water system, sewer service will come from the southern end of the property. The first of what is expected to be several Joint Development Agreements (JDA) to secure and construct wastewater transmission is in place with DHHI, UHWO, DLNR and the City and funded. Indeed, the DOT has already constructed this line as part of the North-South Road Phase 1A contract. Discussions are expected to commence later this year in earnest on separate JDAs for two additional segments. Nearly \$2 million has already been invested to date.

preliminary budgetary costs estimates for these two JDAs range from \$10 million to \$15 million to stub service at the property's southwestern border, \$5 million to \$10 million to route through to the mauka area and as much as another \$60 million for the City's Department of Environmental Services uses connection charges.

- Balancing Spread out Access, Initial Infrastructure Needs and Cash Flows. Today Ho'opili's lands along the Farrington Highway corridor, its northernmost boundary, present Ho'opili's easiest access for construction purposes and future occupants. Once DHHI completes its section of the East-West Connector Road and the State DOT completes the North-South Road (both now under construction), Ho'opili will have construction and occupant access open at its southern and westernmost locations. This is significant because while available for development today, the Farrington Highway corridor is expected to present some of Ho'opili's greatest development challenges, predominantly the distance sewer lines will have to run through undeveloped land for service, as well as timing development to the City's planned improvements to Farrington Highway itself. Thus, the Petitioner will look to mobilize on these other areas as early as practicable. Nonetheless, there are several key commercial parcels in this Farrington Highway corridor that will need to be among the earliest to be marketed in order to generate cash flow to support needed upfront utility (such as water and sewer as detailed above) and road infrastructure throughout Ho'opili. As a result, development should be started in more than one area from the onset. Over the build-out of the project, it is expected that as much as \$50 million to \$60 million could be spent on drainage systems and hundreds of millions will be invested in roadway systems servicing the project.

- Balancing Job Generation, Appropriate Initial Housing Deliveries and Transit. The majority of the employment areas within Ho'opili are within the Farrington Highway corridor to the north of the property, while the residential development areas that could be most sensible to develop first – the single-family areas – are to the south. Starting housing construction there could generally preserve higher density development in the areas in and around the transit corridor to the north to be better staged with transit's completion and more appropriately address the various demands it will create.

- Managing Agricultural Operations. As lands are moved into development over time, consideration will have to be given to the significant challenges of maintaining a working agricultural water system and providing ongoing and unencumbered vehicular access to crop areas. The objective of the Petitioner is to keep active farms onsite as long as practicable.

As previously stated, the development is expected to occur over approximately 20 years. This area of Ewa has long been planned for development (Kapolei Area Long Range Master Plan and Ewa Development Plan).

There are several major transportation projects that have been planned for Ewa. The Ho'opili project has been planned assuming that certain planned transportation projects will be constructed including a portion of North-South Road between Farrington Highway and Kapolei Parkway, a portion of the North-South Road and a new H-1

Freeway interchange: a portion of the intersection of North-South Road and Farrington Highway; the long-planned widening of Farrington Highway fronting Ho'opi'i; the proposed East-West Connector Road through the Petition Area; and the first segment of the proposed Honolulu High-Capacity Transit Corridor project through the Petition Area. As major off-site infrastructure (water, sewer, drainage, electrical and communications) would likely occur in most of the above major road right-of-ways, and the exact timing of the completion of these transportation improvements undetermined, it is difficult for the Petitioner to provide a map identifying the phasing of the proposed action in 10 year increments with any degree of certainty. While the phasing of development may be more relevant where there is little or no development, Ewa has rapidly developed in recent years and proposed transportation improvements are indicative of State and County assumptions that this portion of Ewa would be eventually developed.

Ms. Patopan's Comment: My second issue relates to the project's consistency with the rest of Oahu's regional planning. Section 5 of the EIS makes no mention of why such intense urban development is planned in the "urban fringe" areas of Ewa as described in the Oahu General Plan. In fact, this project is outside of the "Secondary Urban Center" as shown in the General Plan where intense urban growth should be directed to minimize sprawl. The Ewa Development Plan describes the project area as residential and within an urban growth boundary, however it makes no mention of the amount of commercial and industrial development described in the project's EIS. As such, General Plan and Ewa Development amendments should be sought for this project so that the island has the chance to debate the level of growth appropriate for these types of undeveloped lands. This is especially necessary since the City is pushing to designate transit stops within the project area which seems like an effort to undermine the authority of the Land Use Commission and permit the project prior to it going through the necessary reviews.

Response: Objective D of the General Plan's Physical Development and Urban Design objectives and policies were discussed on page 173 of the DEIS. Currently the Ewa Development Plan allows for approximately 16,000+ units within the Petition Area, and the Petitioner is proposing significantly less units (11,750). The Petitioner has been coordinating with the Department of Planning and Permitting from even before the Ewa DP Update process was initiated, and we have been advised that this project would be included in the Ewa DP Update process. We will defer your comment on the authority of the Land Use Commission to others.

Ms. Patopan's Comment: The EIS also uses a desired jobs to housing balance presumably to downplay the substantial traffic impacts of over 160,000 new vehicles on the road per day. Looking at traffic impacts with a "with transit" condition is misleading as it doesn't speak to the likely potential that the train from Waipahu to the project will be expanded during the time it takes to build the project's homes. Also, I just can't see how the creation of only 680 net new jobs in any way justifies the 11,750 homes planned for the project.

Response: By "160,000" new vehicles you must be referring to the 158,669 new vehicle trips that are estimated under the "no transit" scenario. Vehicle trips include all estimated travel segments for each vehicle during the day, including such trips to/from: the babysitter, day care

and/or school; work; university; after-school activities; shopping/dining; etc. Please note the traffic impact analysis report addressed the impact of traffic at full development (year 2030). Construction of the Honolulu High-Capacity Transit Corridor project is expected to start in 2009 and the minimum operating segment (from East Kapolei to Ala Moana) will hopefully be completed well before 2030.

We made an error in the DEIS and incorrectly summarized the Economic and Fiscal Impact Assessment attached to the DEIS as Appendix K ("Economic and Fiscal Impact Assessment for Hoopili," Mikiko Corporation, August 2007). The last two paragraphs of Section 4.7.5 Employment, Anticipated Impacts and Mitigation Measures of the Final EIS will be revised to read as follows:

The project is expected to generate approximately 66,600 full-time equivalent (FTE) person-years of development related jobs during the construction phase of the project. The project will generate direct jobs via on-site retail and office facilities at Ho'opi'i's business park. Excluding those jobs that may relocate to Ho'opi'i from elsewhere in the State, approximately 680 1,550 net new jobs are expected to be created (by 2030) through direct employment associated with the project. In addition, the project will generate indirect jobs via the supply of goods and services. Applying State employment multipliers to the project, approximately 870 jobs will be created through indirect employment associated with the project.

At full build out, employment associated with the Petition Area employment is expected to account for approximately 2,000 +550 net new jobs. Consistent with the Ewa DP and the Kapolei Area Long Range Master Plan, the new jobs will generate employment in Ewa to reduce the need for residents traveling to downtown Honolulu for work-related purposes.

Ms. Patopan's Comment: In conclusion, I feel there is much more study needed for this EIS document to be deemed complete. Detailed soils and past agricultural production studies are needed to determine what land should be ruled out of this redistricting as I hope the project area will downsize. In addition, more detailed studies on traffic impacts along the H-1 Freeway are needed to understand whether the island has the capacity to absorb those 160,000 cars. Additional study is also needed to assess the regional capacities that will likely be strained by this project. I am particularly concerned about current water sources which will have long dried up by 2030.

Response: Decision Analysts, Inc. prepared an agricultural impact assessment report which was appended to the DEIS as Appendix A. The report addresses soils in details and past and current agricultural production in the area, on Oahu and statewide. In summary, the report found that there is more than adequate area statewide for diversified agriculture.

In regards to your comments about "160,000 cars" as we noted earlier, the impact of 158,669 new vehicle trips that are estimated under the "no transit" scenario was evaluated in the Traffic Impact Analysis Report and included in the DEIS in its entirety as Appendix L ("Traffic Impact Analysis Report (TIAR), Hoopili, Oahu, Hawaii, Wilbur Smith & Associates, February 2008).

Regarding your comments on water, please note that a Conceptual Water Master Plan addressing safe drinking and non-potable water facilities was prepared and reproduced in its entirety and attached to the Draft EIS as Appendix M for BWS review and approval.

Ms. Patopan's Comment: The alternatives to the project discussed in Section 6 are woefully inadequate. How can alternatives honestly be evaluated with less than one page of available material each and without any comparable studies to back up the assertions made?

Response: Based on your comments, Section 6.0 Alternatives To The Proposed Action of the EIS will be revised as follows:

In compliance with the provisions of Title 11, Department of Health (DOH), Chapter 200, Environmental Impact Statement Rules, Section 11-200-10(6), the alternatives considered are limited to those that would satisfy the objectives of the proposed mixed-use development, while minimizing the potential for adverse environmental impacts. The feasible alternatives must realistically address the project's economic characteristics while also responding to the surrounding land uses that will be impacted by the project. In conformance with applicable regulations, other possible alternatives have been investigated to identify alternative sites, the appropriate uses for the property, and how they would best be accomplished.

6.1 "NO-ACTION" ALTERNATIVE

The "no-action" alternative would not be consistent with stated governmental policies, which direct future growth to the 'Ewa region. The City and County of Honolulu General Plan states:

Encourage development within the secondary urban center at Kapolei and the 'Ewa and Central Oahu urban-fringe areas to relieve developmental pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.

Under this alternative, the site would remain as agricultural land, underutilized in terms of meeting the demand for residential homes (including affordable homes) and accompanying land uses. The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall. The demand for housing could result in the following scenarios or combinations thereof: there would be more pressure to develop in the other districts, including the rural areas and other areas currently used for cultivation; there could be a demand for higher

density housing in undeveloped areas of 'Ewa at a density not experienced to date; there would be more "doubling up" (larger number of persons per household, with more than one family under roof); those that are not willing to put up with the previously described scenarios may decide to relocate to the U.S. mainland where housing prices have dropped.

The "no-action" alternative was rejected because it is not consistent with government plans to develop Kapolei as the Second City.

6.2 ALTERNATIVE SITES

There are very few large parcels left on O'ahu that are designated for residential development. The largest amount of developable land that is undeveloped lies in Central O'ahu and on the North Shore. As shown on the Ewa Development Plan, the Petition Area is designated mostly Low and Medium Density Residential. As such, the City and County of Honolulu has long recognized that the Petition Area is best used for residential and other development. Directing growth to 'Ewa and in the "urban-fringe" portions of Central O'ahu reduces the pressure to develop outside of the Urban Growth Boundary of Central O'ahu, and the North Shore, Ko'olau Loa, Ko'olau Poko and Wai'anae districts. This alternative has been rejected because it would be clearly contrary to General Plan policy. The potential benefit of this alternative is that for those that object to further development on the 'Ewa Plain, it might be preferable for development to occur elsewhere on O'ahu, such as in the Primary Urban Center, East Honolulu, Central O'ahu, North Shore, Ko'olau Loa, Ko'olau Poko and Wai'anae districts.

The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Implementation of this alternative will avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall.

6.3 ALTERNATIVES RELATED TO DIFFERENT DESIGNS OR DETAILS OF THE PROPOSED ACTIONS WHICH WOULD PRESENT DIFFERENT ENVIRONMENTAL IMPACTS

Different designs could be applied to the project, and depending on the density and design capacity, would result in different environmental impacts. For example, a higher density project that kept the same residential unit count as proposed (11,750) would reduce the buildable area (a positive benefit) and possibly reduce the quantity of surface runoff (a positive benefit). ~~Thus~~ Another potential benefit of this alternative is that it would likely be easier to serve by bus and correspondingly increase ridership. However,

the residential buildings would be larger and taller. This alternative would not allow as wide a range of residential products to market and was thus rejected. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion).

Another alternative would be to set aside less open space and to spread out the community over a larger land area. Such an alternative is best portrayed by the current Kapolei Long Range Master Plan and Ewa Development Plan Land Use Map designations for the Petition Area. This alternative would reduce the density (to some a positive benefit) but consume more land, increasing the quantity of surface runoff, and requiring a much larger investment in grading and infrastructure. This alternative would make it difficult for residents to be served by bus, and even more difficult by high-capacity transit. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). This alternative was also rejected.

The demand for safe drinking water and the quantities of wastewater, solid waste, and traffic generated would vary with different designs, depending on the number/quantity of residential units, schools, commercial square footage, and roads.

6.4 ACTIONS OF A SIGNIFICANTLY DIFFERENT NATURE WHICH WOULD PROVIDE SIMILAR BENEFITS WITH DIFFERENT ENVIRONMENTAL IMPACTS

One scenario that would be significantly different from the proposed action is that an elevated rail line and accompanying transit stops would not be built through Ho'opi'i. Implementation of this alternative will not avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts (assume greater traffic impacts than without the HHCTC project); and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). The impacts of this scenario will be better described in the upcoming HHCTC DEIS.

For the 'Ewa district drivers enduring the longest morning commutes to the Central Business District or UH Mānoa, the modes of transportation will continue to be limited to: private motorized vehicle (including zipper lane), TheBus, TheBoat, Vanpool, et cetera. While this is a scenario that could inevitably result in lengthening commute

times, individual commuters will either: bear with the commute in return for the comfortable lifestyles offered by their homes in 'Ewa; move from their homes in 'Ewa and move closer to their workplaces or schools; or find schools and/or employment in the 'Ewa region. The opening of UHWO will reduce traffic from those undergraduate students in Leeward and Central O'ahu who commute to UH Mānoa, and indirectly reduce the demand for student housing on the UH Mānoa campus (reducing the demand for off-street parking demand on campus, reducing the demand for on-street parking in the surrounding neighborhoods, increasing the supply of student housing on campus, and reducing the demand for student housing off-campus). If the Petitioner is allowed to develop a mixed-use (residential/commercial/office/light industrial) project as proposed, then, more employment opportunities will be provided to existing residents of the region, reducing the need for some 'Ewa residents to commute outside of the District to work. To offset the non-implementation of the HHCTC project, the City and County of Honolulu may decide to increase The Bus and The Boat services. The positive benefits of this alternative is that the visual impact impacts of an elevated rail system would be avoided as well as long-term commitment of State and Federal funds for the HHCTC project. This alternative is not desirable, but feasible.

6.5 THE ALTERNATIVE OF POSTPONING ACTION PENDING FURTHER STUDY

Development of the 'Ewa region as O'ahi's Second City has been studied and planned for many years. Further study of any proposed development on the property would only be delaying what has long been proposed in the Ewa Development Plan. Therefore, this alternative was rejected, as it would not achieve the overall objectives for the project, which would create a mixed-use community that more employment opportunities will be provided to existing residents of the region, reducing the need for some 'Ewa residents to commute outside of the District to work. The potential benefit of this alternative is that while remaining under cultivation, the site would provide open space. Occasionally, however, continued cultivation of the site would generate dust when portions of the site are harvested and plowed. Implementation of this alternative will temporarily avoid: infrastructure impacts (solid waste, wastewater and additional stormwater runoff generated on site); visual impacts (appearance of the site changing from agricultural fields to a master-planned urban development); the loss of agricultural employment; traffic impacts; and construction-related impacts (such as construction noise, construction equipment exhaust emissions, temporary traffic disruption, fugitive dust and soil erosion). Occasionally, however, continued cultivation, harvesting and plowing of the site will expose soils to the erosional forces of wind and rainfall.

Ms. Patopan's Comment: I hope there are many more government reviews to evaluate this project if it remains in its current form. In addition to the added City processed I mention in this letter, I feel an intervention with the Land Use Commission is necessary to downsize this project and to make sure that someone identifies that the County is currently setting the stage for development by identifying transit steps before the Commission has had a chance to deliberate.

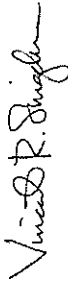
Ms. Agnes Patopan
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 10

Response: We acknowledge your concerns. Please be assured that there will be many more governmental reviews including the State Land Use District Boundary Amendment process and rezoning. You will have many opportunities to voice your concerns before the Land Use Commission, Planning Commission and City Council.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

0:\u0062592803.01 DK\Horton-E Kapolei\EIS\Final EIS\Final EIS Response Letters\Bf_23 Agnes Patopan Response.doc



"alchock@att.net"
-alchock@att.net
04/03/2008 06:03 PM

To luc@dbedt.hawaii.gov
cc
bcc
Subject A06-771 - Ho'opili

RECEIVED

APR 04 2008

STATE OF HAWAII
LAND USE COMMISSION

ORIGINAL

Reference: A06-771, D. R. Horton - Schuler Homes, LLC, a Delaware limited liability company, d.b.a. D. R. Horton - Schuler Division.

I want to protest the granting of the Petition for Land Use District Boundary Amendment (from agricultural land use district to urban land use district) by Horton-Schuler Division.

The reason for this objection is that the transportation infrastructure is inadequate, and the additional traffic generated by the Ho'opili subdivision will clog up the current highway system (which already is operating at more than full capacity during the rush hours). The implementation of the *Honolulu High-Capacity Travel Corridor Project* is still in the developmental stage, with the City Council still generating a lot of waha nui about it. Even if the City Council should make a decision soon, the first segment, "the train to nowhere" (Kapolei to Pearl City), is not expected to be completed until 2012. Given the normal extended time for construction here, it would probably not take place until 2013 or 2014. The full project, to downtown Honolulu and the University of Hawaii at Manoa (UHM), would, at the earliest, be completed in 2019, and more likely than not, be delayed at least a couple of years.

A developer normally develops all of the infrastructure (i.e., streets, sewage, utilities; land for schools and parks, and sometimes, even partial funding for them) within the subdivision, as demonstrated by the major developers (Gentry and Haseko) in the 'Ewa plain. However, the infrastructure outside the projects is the responsibility of the City & County and the State, and these governmental entities have not demonstrated their ability to provide them in a timely manner

A prime example of this is the North-South Road, from 'Ewa Beach to H-1. When we returned home in 1992 after an absence of a quarter century (we did come home every couple of years, however, since I taught at the UHM summer session), the State was still working on Kalaniana'ole Highway to East Honolulu (but that is an example on the other side of Honolulu proper). When we purchased our townhouse in 'Ewa by Gentry, there was a lot of wala'au about the North-South Road, and expectations



August 11, 2008

W. FRANK BRANDI, ASLA
Chairman

J. MARKS WITTLES, ASLA
President

R. STAN DUNCAN, ASLA
Executive Vice-President

RUSSELL L. CHUNG, ASLA
Executive Vice-President

VINCENT S. SHIBUKUNI
Vice-President

GRANT F. MURAKAMI, AICP
Principal

TOM SCHINELL, AICP
Senior Associate

RAYMOND Y. HIGA, ASLA
Senior Associate

KEVIN K. NISHIKAWA, ASLA
Associate

KIMUHIKAMI YUUN, LEUPA
Associate

SCOTT LAIKA AIRIGO
Associate

SCOTT MURAKAMI, ASLA
Associate

HONOLULU OFFICE
1031 Bishop Street
ASU Tower, Suite 629
Honolulu, Hawaii 96813-3884
Tel: (808) 521-2641
Fax: (808) 521-2675
E-mail: system@pbrhawaii.com

HILO OFFICE
114 Jaganua Street
Hilo, Hawaii 96720-5452
Tel: (808) 961-3223
Fax: (808) 961-1987

WAILUKU OFFICE
1797 Wai Hala Lane, Suite 3
Wailuku, Hawaii 96791-1271
Tel: (808) 542-2675

that it would be completed immediately. Eighteen years later, this is still a myth. I got somewhat involved in community activities, with a three year term on the Board of the 'Ewa by Gentry Community Association (Vice President, 1993-95; President, 1995-96), as well as on the Board of our condominium, and co-spokesperson on the first 'Ewa-Makakilo Vision Team. While the two developers completed their portions of the North-South Road, the State has still not fulfilled its bargain! It also took the State & City almost ten years to change the traffic light synchronization on Fort Weaver Road from stopping at each intersection, to being able to move without stopping at each light. Now there is so much traffic that the cars move at a snail pace and stop at every light anyhow.

Need I say more? Do you really want to clog up H-1? Should we be reactive or proactive?

I can speak now, detached, because we have moved from the 'Ewa plain to Kane'ohu, where there are three highways to the leeward side of the Ko'olau, and where the commuting time has been reduced by more than 50%.

We need agricultural land close to the market. The current area is very productive, and the availability of similar land is not available with the urbanization of the island of O'ahu. The argument that because the parcels are surrounded by Urban Districts, we should abandon agriculture and have more subdivisions? Especially with the slowdown of the real estate market, the petitioner's proposals do not make any sense. The designation of different use districts was designed to prevent problems from occurring. Changing them at this time would not be wise.

I would respectfully request the Land Use Commission to deny the proposed Ho'opi'i petition.

Aloha,
Al Keali'i Chock
45-090 Namoku St. #1315-16
Kane'ohu 96744-5315

ORIGINAL

SUBJECT: HO'OPII DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Chock:

We are in receipt of your email dated April 3, 2008 to Mr. Rodney Maile of the Land Use Commission. We have reviewed your email and provide the following responses:

Transportation

Mr. Chock's Comment: "I want to protest the granting of the Petition for Land Use District Boundary Amendment (from agricultural land use district to urban land use district) by Horton-Schuler Division. The reason for this objection is that the transportation infrastructure is inadequate, and the additional traffic generated by the Ho'opi'i subdivision will clog up the current highway system (which already is operating at more than full capacity during the rush hours). The implementation of the *Honolulu High-Capacity Travel Corridor Project* is still in the developmental stage, with the City Council still generating a lot of waha nui about it. Even if the City Council should make a decision soon, the first segment, "the train to nowhere" (Kapolei to Pearl City), is not expected to be completed until 2012. Given the normal extended time for construction here, it would probably not take place until 2013 or 2014. The full project, to downtown Honolulu and the University of Hawaii at Manoa (UHM), would, at the earliest, be completed in 2019, and more likely than not, be delayed at least a couple of years."

Response: We acknowledge that the construction of the project will generate additional traffic in the 'Ewa region. However, full development of the project is expected to occur around 2030, which provides for an adequate amount of time for the Honolulu High-Capacity Transit Corridor to be constructed. The development of the HHCTC within the Ho'opi'i project site would reduce the number of vehicle-trips generated by the project. The project in itself is designed to offer daily live, work, play, learning and shopping opportunities, reducing the need for residents to use H-1 Freeway and Fort Weaver Road. Coupled with that, the Second City of Kapolei is rapidly maturing and providing its own work and shopping opportunities. With UHWO being developed next door, Ho'opi'i residents who would have normally commuted to UH Manoa for their undergraduate degree will no longer have to do so.

Infrastructure

Mr. Chock's Comment: "A developer normally develops all of the infrastructure (i.e., streets, sewage, utilities; land for schools and parks, and sometimes, even partial funding for them) within the subdivision, as demonstrated by the major developers (Gentry and Haseko) in the 'Ewa plain. However, the infrastructure outside the projects is the responsibility of the City & County and the State, and these governmental entities have not demonstrated their ability to provide them in a timely manner.

A prime example of this is the North-South Road, from 'Ewa Beach to H-I. When we returned home in 1992 after an absence of a quarter century (we did come home every couple of years, however, since I taught at the UHM summer session), the State was still working on Kalaniana'ole Highway to East Honolulu (but that is an example on the other side of Honolulu proper). When we purchased our townhouse in 'Ewa by Gentry, there was a lot of wala'au about the North-South Road, and expectations that it would be completed immediately. Eighteen years later, this is still a myth. I got somewhat involved in community activities, with a three year term on the Board of the 'Ewa by Gentry Community Association (Vice President, 1993-95; President, 1995-96), as well as on the Board of our condominium, and co-spokesperson on the first 'Ewa-Makakilo Vision Team. While the two developers completed their portions of the North-South Road, the State has still not fulfilled its bargain! It also took the State & City almost ten years to change the traffic light synchronization on Fort Weaver Road from stopping at each intersection, to being able to move without stopping at each light. Now there is so much traffic that the cars move at a snail pace and stop at every light anyhow.

Need I say more? Do you really want to clog up H-I? Should we be reactive or proactive?

I can speak now, detached, because we have moved from the 'Ewa plain to Kane'ohē, where there are three highways to the leeward side of the Ko'olau, and where the commuting time has been reduced by more than 50%."

Response: We acknowledge your concern that the infrastructure outside of the Ho'opili project is the responsibility of the City & County of Honolulu and the State of Hawaii, and your assessment that these governmental entities have not demonstrated their ability to provide them in a timely manner. Please note that the Petitioner is coordinating with various City and State agencies and surrounding developers (such as DHHL and UHWO) so that on-site and off-site infrastructure facility improvements can be better timed with Ho'opili's development. In addition, Ho'opili will contribute to the Ewa Highway Transportation Master Plan Impact Fee program, supporting development of local roadways and easing impacts on the existing arterials.

Agriculture

Mr. Chock's Comment: "We need agricultural land close to the market. The current area is very productive, and the availability of similar land is not available with the urbanization of the island of O'ahu. The argument that because the parcels are surrounded by Urban Districts, we should abandon agriculture and have more subdivisions? Especially with the slowdown of the

real estate market, the petitioner's proposals do not make any sense. The designation of different use districts was designed to prevent problems from occurring. Changing them at this time would not be wise."

Response: We acknowledge your comments regarding agricultural lands on the island of O'ahu. However, the reality is that of the 43,400 acres that are were rated A and B on the State Geographical Information System layer in 1995, 41,750 acres or 96% are still available for agricultural use. The project site has been long planned by the Ewa Development Plan and Kapolei Long Range Master Plan as an area for new development. In addition, the Hawaii Housing Finance Development Corporation, University of Hawai'i - West O'ahu (UHWO), the State Department of Transportation, and the Department of Hawaiian Home Lands have all developed former agricultural lands immediately adjacent to the proposed Ho'opili project into the Villages of Kapolei, UHWO Campus, the North-South Road and the Department of Hawaiian Home Lands East Kapolei developments. All of these developments fall within the urban growth boundary.

Over the years, a number of communities developed in the 'Ewa region, including the 'Ewa Plantation Villages, the 'Ewa Beach community, and Barbers Point Naval Air Station (now known as Kalia). In the 1960's, Makakilo City and the James Campbell Industrial Park were started based on an overall master plan for the area prepared by the Estate of James Campbell in the mid-1950's.

'Ewa is a key component of the City and County of Honolulu's directed growth policies. In 1974, Donald Wolbrink of Harland Bartholomew developed a visionary plan for Kapolei. After much public discussion, the decision to direct urban growth to the 'Ewa area became the official policy of the City and County of Honolulu. In 1977, the Honolulu City Council approved a new General Plan that designated 'Ewa as the location for a Secondary Urban Center for O'ahu. The Secondary Urban Center was to be the focus of major economic activity, housing development, and a center for government services, while preserving areas such as Wai'anae and the North Shore for rural uses.

In August 1977, the State Land Use Commission (SLUC) approved the first State Land Use District Boundary Amendment (SLUDBA) in 'Ewa. This SLUDBA permitted the development of West Beach (now referred to as Ko 'Olina). Subsequent to the Ko 'Olina approval, both the State and the City and County of Honolulu filed at least four petitions with the SLUC to amend the State Land Use Districts in 'Ewa from Agricultural to Urban. In all of the petitions, the General Plan designation of 'Ewa as the Secondary Urban Center was cited as proof that "urbanization" of 'Ewa was consistent with the City and County of Honolulu's planning policy. Similarly, when the Honolulu City Council adopted the Ewa Development Plan (DP) in 1997, petitioners cited both the General Plan and the Ewa DP for their respective project's consistency with the City and County of Honolulu's directed growth policy.

In nearly all of the State and City and County of Honolulu SLUDBA's, soils were rated at or near the top of agricultural productivity rating systems: "A" or "B" by the Land Study Bureau (LSB), and "Prime" under the agricultural lands of importance to the State of Hawaii (ALISH) system. For example, the largest SLUDBA involved 1,300 acres of land adjoining Ho'opili in SLUC Docket No. A99-728, also referred to as the Housing and Community Development

Mr. Al Keali'i Chock
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 4

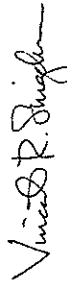
Corporation of Hawaii (HCDC) East Kapolei. Ninety-seven percent of the soils in HCDC East Kapolei were rated "A" or "B" by the LSB, and nearly all of the 1,300 acres were rated "Prime" under ALISH. HCDC East Kapolei is now under or proposed for development by the University of Hawai'i West O'ahu, the Department of Hawaiian Home Lands, the State Department of Transportation (North-South Road), the proposed Salvation Army Kroc Center, and the State Department of Land and Natural Resources.

Additionally, the State appears to maintain its commitment toward growing the Second City in Kapolei by its construction of State office building, and a planned new judiciary complex on former agricultural lands. Finally, during the public review period, the State Department of Land and Natural Resources (DLNR), Engineering Division wrote: "DLNR currently owns approximately 183 acres of land near and/or adjacent to the Ho'opili project...The DLNR parcels have excellent development potential based on the location of these lands adjacent to or near major arteries (H-1 Freeway, Farrington Highway, North-South Road) and the City's proposed transit line as well as the substantial increase development projects in the area." In summary, while we understand your concerns regarding agricultural lands, the project remains consistent with long-standing planning policies that have taken into consideration the potential loss of agricultural land to the state.

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\06252503\01 DR Honor-E Kapolei\EIS\Final EIS\Final EIS Response Letters\BL-33 Check Response.doc

Rodney Maile/DBEDT
04/09/2008 04:12 PM

To Sandra M Matsushima/DBEDT@DBEDT, Bert Saruwalar/DBEDT@DBEDT
cc
bcc
Subject Fw: Testimony - Ho'opili Project

--- Forwarded by Rodney Maile/DBEDT on 04/09/2008 04:12 PM ---



"Johnnie-Mae L. Perry"
<noipono@yahoo.com>
04/08/2008 06:15 PM

To rmaile@dbedt.hawaii.gov
cc
Subject Fwd: Testimony - Ho'opili Project

Hi Rodney,

Did you get my testimony (below) in time? I just found the correct email address.

Thanks,

Johnnie-Mae L. Perry

"Johnnie-Mae L. Perry" <noipono@yahoo.com> wrote:
Date: Sat, 5 Apr 2008 15:35:07 -0700 (PDT)
From: "Johnnie-Mae L. Perry" <noipono@yahoo.com>
Subject: Testimony - Ho'opili Project
To: rmaile@hawaii.gov/luc.state.hi.us

Please forward immediately to:

Mr. Rodney Maile (808 587-3822)
Accepting Authority: State of Hawaii Land Use Commission
P.O.Box 2359
Honolulu, Hawaii 96804-2359.

RE: Ho'opili Project (HRS 343 DEIS)
District: EwaTMK: Petition Area: 9-1-17: 04 (portion), 59, and 72; 9-1-18: 01 and 04.
Remainder of the Project Area: 9-1-10: 02, 14 (portion), and 15 (portion); 9-1-17: 04 (portion); 9-2-01: 04, 05, 06 and 07; and 9-2-02: 02.

PUBLIC COMMENT 04-08-08 -- HO'OPILI PROJECT

I, Johnnie-Mae L. Perry of 85-1214 Kaneilio St., Wai'anae, HI 96792 OPPOSE the Ho'opili Project because of the displacement of Aloun Farms, no plans of waste to energy technologies and no plans of working with Habitat for Humanity - Leeward to build 3,600 self-help homes.



Dear Uchida came to the Wai'anae Coast Neighborhood Board #24 on April 1 and did an informational presentation.

Yours truly,

Ms. Johnnie-Mae L. Perry
Concern Citizen

August 11, 2008

W. FRANK BRANDT/ASHA
Chairman

H. MASS. WITLIN/ASHA
President

K. STAN DUNCAN/ASHA
Executive Vice-President

RUSSELL Y. CHUNG/PSIA
Executive Vice-President

VINCENT SHIGEKUNI
Vice-President

GRANT L. MURAKAMI/AICP
Principal

TOM SCHINELL/AICP
Senior Associate

RAMONDI THIGA/ASHA
Senior Associate

KEVIN K. NISHIKAWA/ASHA
Associate

KIMURAKAMI YUEN LILIP/AP
Associate

SCOTT AIKKA/HRIGGO
Associate

SCOTT MURAKAMI/ASHA
Associate

HONOLULU OFFICE
1001 Bishop Street, Suite 1100
Honolulu, Hawaii 96813-3484
Tel: (808) 521-2631
Fax: (808) 521-1102
E-mail: spainning@pbrhawaii.com

HONOLULU OFFICE
1001 Bishop Street, Suite 1100
Honolulu, Hawaii 96813-3484
Tel: (808) 521-2631
Fax: (808) 521-1102

WAILUKU OFFICE
1789 Wai'anae Loop, Suite 4
Wailuku, Hawaii 96793-1271
Tel: (808) 542-2678

SUBJECT: HO'OPI LI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Perry:

We are in receipt of your email dated April 5, 2008 to Mr. Rodney Maile of the Land Use Commission. We have reviewed your email and provide the following responses:

1. All tenants are aware of and have been kept informed about the urbanization plans for the property. At the time leases with the tenants were executed, these disclosures were made. In consideration for the tenants' eventual need to relocate, the Petitioner has made efforts to assist them in the short-term by keeping lease costs for the land and water at or below market rates. This consideration is also mentioned on Page 30 of the Draft EIS.

The Petitioner remains committed to working on the relocation of its larger tenant, including Aloun Farm, Inc., consistent with its statement on Page 30 of the Draft EIS. However, to date, no site has been secured for that purpose.

2. While there are no plans to develop waste to energy technologies on the project site, recycling shall be encouraged within the project including the reuse and recycling of green waste generated during construction clearing and grubbing activities, the use of recycled construction and demolition wastes and the use of materials made from recycled products, the use of locally produced compost as available for landscaping, and the provision of space for recycling bins in the detailed design of the community. These mitigation measures were described on pages 92 and 93 of the Draft EIS. As noted on page 95 of the Draft EIS, the City and County of Honolulu has plans to expand the H-POWER refuse-to-energy plant by adding a third boiler at the facility.

3. The Petitioner lauds Habitat for Humanity - Leeward in its attempt to construct 3,600 self-help homes, however, there are no plans to incorporate these homes as part of the project. Please note that up to 30 percent of the total number of units for the Ho'opi li project is expected to be developed as affordable housing units to comply with the City and County of Honolulu's affordable housing guidelines.

.....
You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access. No Cost.

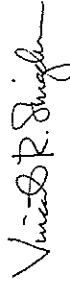
.....
You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access. No Cost.

Ms. Johnnie-Mae L. Perry
SUBJECT: HO'OPIILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII



Vincent R. ShigeKuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\web2\92593\01 DR_Honou-E Kapohela\EIS\Final EIS Responses Letters\BL-34 Perry Responses.doc

From: ALECS [mailto:alecs@alounfarm.com]

Sent: Tuesday, April 01, 2008 1:46 PM

To: Dean Y Uchida

Cc: Alan Gottlieb

Subject: HOOPIILI EIS

Importance: High

Dean,

In my review of the Ho'opiili E.I.S., there is some conflicting information that I want to point out. Whether this will lead to a formal comment, I would like your response and discussion on would be appropriate.

The portion that reference to the economic impact of the farm business is incorrect (top of page #31). The numbers are significant far off that I believe it is appropriate to point out.

The figure of \$6m is probably half as our entity exceed that and not to account for Fat Law/Jeff's winter tomato crop/and all the corn seed that contract grow on the plains. The job impact of 80 full time is also grossly under stated. While it would be alright to under gross the \$\$ generated, but the number of people under stated will surely come up as you take this through the Land Use Commission. AF Alone, have always exceeded 130 full time. We have floated between 130 and 165 position. We've been on the low side in 2006 and '07 due to losing staff to housing/landscaping/and now Monsanto pull. We've made it up in lots of over time and part-timers. Outlook for 2008 is that we'll increase back up close to the optimal of 165 full time company. Again, there is still the corn seed/Sugarland/and Fat Law entity that employs.

I am on a short notice leave this week; here in Japan to introduce our Ewa Sweet Onion. I'll be checking emails and do have an emergency number, cel 81-80-67609027. Will be at this number the next 24 hrs.

Thanks,
Alec Sou
Aloun Farm, Inc.



W. FRANK IRANDIENASIA
Chairman

THOMAS WITTEN, ASIA
President

R. STANFORD, ASIA
Executive Vice-President

RUSSELL CHUNG, ASIA
Executive Vice-President

VINCENT SHIGEMINI
Vice-President

GRANT T. MURAKAMI, AICP
Principal

TOM SCINCELLI, AICP
Senior Associate

RAYMOND T. JIGA, ASIA
Senior Associate

KEVIN K. NISHIKAWA, ASIA
Associate

KIMI MURAKAMI YUEN, AICP
Associate

SCOTT AIKKA, ABRIGO
Associate

SCOTT MURAKAMI, ASIA
Associate

HONOLULU OFFICE
1061 Bishop Street
5th Floor, Suite 600
Honolulu, Hawaii 96813-2484
Tel: (808) 529-1102
E-mail: pmadmin@pbbhawaii.com

HILLO OFFICE
101 Aiea Way
Hilo Lagoon Center, Suite 309
Hilo, Hawaii 96720-0763
Tel: (808) 961-3332
Fax: (808) 961-5999

WAILUKU OFFICE
1787 Wai'ia Loop, Suite 4
Wailuku, Hawaii 96791-1271
Tel: (808) 242-2678

Mr. Alec Sou
SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT
August 11, 2008
Page 2

Thank you again for your participation in the Environmental Impact Statement process for this project. Your comment letter and this response will be included in the Final Environmental Impact Statement. If you have any questions regarding this project, please do not hesitate to contact me at 521-5631.

Sincerely,

PBR HAWAII

Vincent R. Shigekuni
Vice President

cc: Ms. Katherine P. Kealoha, Office of Environmental Quality Control
Mr. Dan Davidson, State Land Use Commission

O:\08\2925293.01 DR Homom-E Kapolei\EIS\Final EIS\Final EIS Response Letter\BL-13 Sou Response.doc

SUBJECT: HO'OPILI DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Sou:

Thank you for your email dated April 1, 2008. We have reviewed your email and offer the following response to your comments.

The portion that reference to the economic impact of the farm business is incorrect (top of page #31). The numbers are significant far off that I believe it is appropriate to point out.

The figure of \$6m is probably half as our entity exceed that and not to account for Fat Law/Jeff's winter tomato crop and all the corn seed that contract grow on the plains. The job impact of 80 full time is also grossly under stated. While it would be alright to under gross the \$\$ generated, but the number of people under stated will surely come up as you take this through the Land Use Commission. AF alone, have always exceeded 130 full time. We have floated between 130 and 165 position. We've been on the low side in 2006 and '07 due to losing staff to housing/landscaping and now Monsanto pull. We've made it up in lots of over time and part-timers. Outlook for 2008 is that we'll increase back up close to the optimal of 165 full time company. Again, there is still the corn seed/Sugarland and Fat Law entity that employs.

We greatly appreciate the information provided. According to our consultant, Bruce Plasch of Decision Analysts, Inc., his agricultural impact assessment is based in part, on interviews with existing tenants, many of who are farming in areas outside of the Petition Area as well. According to Mr. Plasch, he interviewed you on two separate occasions.

Regarding the specific number of jobs and revenue generated, Mr. Plasch's numbers were based only on the portion of Alouin Farms within the Petition Area. Please see Table 2, Economic Activity Generated by Agricultural Operations in the Petition Area: 2007, and Table 4, Projected Economic Activity Generated by Agricultural Operations in the Petition Area: 2010, as show in Appendix A, Agricultural Impact Analysis, of the Draft EIS.