



Nanakuli Community Baseyard

TMK (1) 8-7-09:02 (por.)
Luvalualei, O'ahu, Hawai'i

ADDENDUM to the
Final Environmental Impact Statement

April 2010



Prepared for: TROPIC LAND LLC

Pet. Ex. No. 13A

ADDENDUM

Final Environmental Impact Statement

Nānākuli Community Baseyard

Lualualei, O‘ahu, Hawai‘i

TMK: (1) 8-7-09: 02 (Por.)

Tropic Land LLC

April 2010

This Addendum to the Final Environmental Impact Statement (FEIS) for the proposed Nānākuli Community Baseyard contains the following material:

1. Revised pages ii and iii of the Table of Contents. Page ii revised to include a separate section on the Relationship between Local Short-term Uses of Humanity’s Environment and the Maintenance and Enhancement of Long-term Productivity. Page iii revised to note that Appendix M was changed to Environmental Impact Statement Preparation Notice (EISPN): Comments Received and Responses.

2. Revised page 5-41 of the FEIS. Page 5-41 was revised to correct Table 12 in which the traffic assignment split percentages on the fourth line were inadvertently transposed.

3. Comment to the Draft Environmental Impact Statement (DEIS) dated December 3, 2009, by the State of Hawai‘i, Department of Land and Natural Resources, State Historic Preservation Division to be added to Chapter 9 of the FEIS. A portion of this letter was inadvertently omitted.

4. Response letters to comments on the DEIS to replace the response letters contained in Chapter 9. The response letters have been expanded to include verbatim material from the FEIS relevant to each addressee’s questions or comments. The original response letters are contained in Chapter 9 of the FEIS; the responses themselves have not changed.

5. Response letters to comments on the Environmental Impact Statement Preparation Notice (EISPN). Individual letters were prepared in response to comments on the EISPN. As mentioned in the DEIS, comments to EISPN were addressed as indicated in the summary table. This summary table and the EISPN comment letters are to be included as Appendix M of the FEIS. These response letters are added to Appendix M.

6. Section 7.7 added to the FEIS providing a separate and distinct section on the relationship between local short-term uses of humanity’s environment and the maintenance and enhancement of long-term productivity.

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2 Revised page 5-41 of FEIS

Table12
Traffic Assignment

Peak Hour	Direction	Northbound	Southbound
AM	Enter	75%	25%
	Exit	15%	85%
PM	Enter	85%	15%
	Exit	75% 25%	25% 75%

Source: Traffic Management Consultant. *Traffic Impact Analysis Report*, September 2008.

AM Peak Hour Traffic Impact With Project

With project implementation, the intersection of Farrington Highway and Lualualei Naval Access Road is expected to operate at an overall LOS “F” and a v/c ratio of 1.86 during the AM peak hour. Southbound Farrington Highway and Lualualei Naval Access Road approaches are expected to operate at LOS “F.”

PM Peak Hour Traffic Impact With Project

With project implementation, the intersection of Farrington Highway and Lualualei Naval Access Road is expected to operate at LOS “F” with a v/c ratio of 1.39. Both Farrington Highway approaches and Lualualei Naval Access Road are expected to operate at LOS “F.”

Mitigation Measures

To mitigate the impacts of project-generated traffic, Tropic Land will discuss traffic mitigation measures with the State and City, and is willing to participate in a fair share arrangement with the State of Hawaii and other users of Lualualei Naval Access Road to improve the intersection of Farrington Highway and Lualualei Naval Access Road.

Improvements recommended by the Traffic Impact Analysis Report (TIAR) and the project engineer include:

- Widening of southbound Farrington Highway to provide an exclusive left-turn lane (350 feet in length and 11 feet in width)
- A tapered median area (300 feet in length) along northbound Farrington Highway to align with the southbound left-turn lane
- Widening Lualualei Naval Access Road to provide double left-turn lanes (350 feet in length; 11 feet in width) and an exclusive right-turn lane
- Relocation of existing traffic signals, utility poles, and drainage structures affected by the widening

**3 Letter from the State Historic Preservation Division,
December 3, 2009, commenting on the DEIS**

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI
FIRST DEPUTY

KEN C. KAWAHARA
DEPUTY DIRECTOR - WATER

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

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

December 3, 2009

Dan Davidson, Executive Officer
Land Use Commission
235 S Beretania Street, Room 406
Honolulu, Hawai'i 96813

LOG NO: 2009.4589
DOC NO: 0912NM07
Archaeology

Dear Mr. Davidson:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
Nanakuli Community Baseyard
Lualualei Ahupua'a, Wai'anae District, Island of O'ahu
TMK: (1) 8-7-009:002**

Thank you for the opportunity to review the aforementioned project, which we received on November 23, 2009. We apologize for the long delay in response. The proposed undertaking involves a 96-acre potential industrial park.

Cultural Surveys Hawaii surveyed a 170-acre project area surveyed (Hammatt *et al.* 1993. *An Archaeological Inventory Survey of a 170-acre Parcel in the Ahupua'a of Lualualei, Wai'anae District, Island of O'ahu.* [TMK: 8-7-9: portion 2; 8-7-10; 8-7-19: portion 1] SHPD Rpt No. O-792). The Hammatt *et al.* (1993) was accepted by this office in a letter (LOG NO: 10208, DOC NO: 9311EJ32) dated December 1, 1993.

There are four archaeological sites within the 96 acre project area. These are: site -4370, remnants of a historic ranching house lot, site -4367, a historic wall segment, site -4373., an incinerator belonging to the ranching and military period and site -4372, a foundation belonging to the ranching era. As stated in a letter (LOG NO: 9258, DOC NO: 9308ej17) dated September 7, 1993, we believe these sites have been adequately documented in the Hammatt *et al.* (1993) inventory survey. However, one archaeological site, SIHP NO. 50-80-08-4366 identified during the Hammatt *et al.* (1993) study was recommended for preservation. Site -4366 does not lie within the current APE, and thus, we believe it will not be impacted by the proposed undertaking.

Therefore, we believe the current undertaking will have "no effect" on historically-significant resources. However, should the APE or the scope of work for the proposed undertaking change, or if other portions of the subject parcel are to be developed, proactive archaeological mitigation (*e.g.* preservation plan for site -4366) will be required.

Mr. Dan Davidson

Page 2

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon".

Nancy McMahon, Deputy SHPO/State Archaeologist and
Historic Preservation Manager
State Historic Preservation Division

Cc; Abbey Meyer, Office of State Planning Room 600

Glenn Kimura, Kimura International Inc 1600 Kapiolani Blvd, room 600 Honolulu, HI 96813

4 DEIS Comments and Responses
(Replacing material in Chapter 9 of the FEIS)

Letters with Substantive Comments

Federal Agencies

- U.S. Army Corps of Engineers, Regulatory Branch
- Department of the Navy, Naval Facilities Engineering Command

State Agencies

- Commission on Water Resource Management
- Department of Transportation
- Land Use Commission
- Office of Conservation and Coastal Lands
- State Historic Preservation Division
- University of Hawaii, Environmental Center
- West County Farm Bureau

City Agencies

- Board of Water Supply
- Department of Planning and Permitting
- Department of Transportation Services
- Fire Department

Community Organizations

- Concerned Elders of Waianae
- KAHEA



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT
FORT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF:

January 25, 2010

Regulatory Branch

POH-2009-00191

RECEIVED JAN 26 2010

Glenn T. Kimura
Kimura International, Inc.
1600 Kapiolani Blvd., Suite 1610
Honolulu, Hawaii 96813

Dear Mr. Kimura:

This letter is in response to your November 20, 2009 request for comments on the Draft Environmental Impact Statement (DEIS) for the proposed Nanakuli Community Base Yard located at Lualualei, Waianae District, Island of Oahu, Hawaii (TMK: (1) 8-7-009:002(por). We have reviewed your proposal pursuant to Section 10 of the Rivers and Harbors Act of 1899 (Section 10) and Section 404 of the Clean Water Act (Section 404). We have determined that a Department of Army (DA) permit is not required for your proposed work as described in the DEIS.

Section 10 requires that a DA permit be obtained for certain structures or work in or affecting navigable waters of the United States (U.S.), prior to conducting the work (33 U.S.C. 403). Because the Ulehawa Stream is not considered a navigable water, a Section 10 permit is not required. Section 404 requires that a DA permit be obtained for the discharge of dredged and/or fill material into waters of the U.S., including wetlands and navigable waters of the U.S, prior to conducting the work (33 U.S.C. 1344). Although the Ulehawa Stream is considered a water of the U.S, a Section 404 permit is not required for your proposed work as the DEIS indicates that no work will be done in the stream nor will any work be done which will result in secondary impacts to the stream.

This letter contains an approved JD for the property in question. If you object to this determination, you may request an Administrative Appeal under Corps regulations at 33 Code of Federal Regulations (CFR) Part 331. We have enclosed a Notification of Appeal Process and Request For Appeal (NAP/RFA) form. If you request to appeal this determination you must submit a completed RFA form to the Corps' Pacific Ocean Division office at following address:

Thom Lichte, Appeals Review Officer
U.S. Army Corps of Engineers
Pacific Ocean Division, ATTN: CEPOD-PDC
Building 525
Fort Shafter, HI 96858-5440

This jurisdiction determination is valid for a period of five (5) years from the date of this letter unless new information warrants revision of the delineation before the expiration date.

Thank you for giving us the opportunity to review this proposal and for your cooperation with our regulatory program. Please be advised you can provide comments on your experience with the Honolulu District Regulatory Branch by accessing our web-based customer survey form at <http://per2.nwp.usace.army.mil/survey.html>.

Should you have any questions, please contact Mr. Robert Deroche of this office at the above address or telephone 808-438-2039 (FAX: 808-438-4060) or by E-Mail at robert.d.deroche2@usace.army.mil. Please refer to File No. POH-2009-00191 in all future communications with this office regarding this or other projects at this location.

Sincerely,



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

Enclosures

Flowchart
RFA Document
Approved JD

Copy Furnished (w/o Encl.)

Dan Davidson, Executive Officer, Land Use Commission, 235 S. Beretania Street, Room 406
Honolulu, Hawaii 96813



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. George P. Young, Chief
Regulatory Branch
U.S. Army Corps of Engineers, Honolulu District
Fort Shafter, HI 96858-5440

Dear Mr. Young:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 25, 2010 [Ref: POH-2009-00191]. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and comments.

We acknowledge that your letter constitutes an approved jurisdictional determination (JD) for the property and is valid for a period of five years from the date of the letter.

Further, we note that a Department of Army (DA) permit is not required under Section 10 of the Rivers and Harbors Act of 1899 because Ulehawa Stream is not considered navigable water. And that a DA permit is not required under Section 404 of the Clean Water Act because the proposed work will not occur in Ulehawa Stream nor will the proposed action result in secondary impacts to the stream.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, HAWAII
400 MARSHALL ROAD
PEARL HARBOR, HAWAII 96860-3139

IN REPLY REFER TO:

5090

Ser OPHE2/ 00120

03 FEB 2010

Kimura International INC.
1600 Kapiolani Blvd, Suite 1610
Honolulu, HI 96814

RECEIVED FEB 09 2010

Dear Mr. Glenn T. Kimura:

SUBJECT: NANAKULI COMMUNITY BASEYARD DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Naval Facilities Engineering Command, Hawaii (NAVFAC HI) has reviewed the draft Environmental Impact Statement (DEIS) regarding Tropic Land LLC's proposed development in Lualualei Valley. We offer two house-keeping comments, followed by a series of important concerns regarding the use of Lualualei Naval Access Road and other encroachment issues:

1. When referring to the Navy's installation at Lualualei, please refer to its proper name: Joint Base Pearl Harbor Hickam (JBPHH) Lualualei Annex (LLL Annex). Commands within this area are: Navy Munitions Command, East Asia Division, Pearl Harbor Detachment (NMC EAD PH) and Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS PAC). Please provide correct location and/or command references throughout the document.
2. NAVSTA PH, LLL Annex is developed with ordnance storage facilities and receiver towers. This land use is inaccurately noted on page 5-7, section 5.3 paragraphs 2 and 5, as an "urban type activity" (concentration of people, structures, etc.). The nature of the type of activities at LLL Annex necessitates a low concentration of people and properly constructed and sited ammunition storage facilities and antenna. Please revise this description and analysis accordingly.
3. The DEIS declares Lualualei Naval Access Road, a military roadway, as the primary access for the project. The project will generate vehicular traffic (primarily trucks) on Lualualei Naval Access Road. This increased usage, over time, will require increased roadway maintenance and repair, with costs borne by the Navy. Civilian use of this roadway also increases the Navy's exposure to liability.
4. This project will require an amendment to the State Land Use District from "Agricultural" to "Urban" and a change in zoning from Preservation (P-2) to Limited Industrial (I-1). Approval of these amendments may set a precedent for similar land use

conversions on the remaining undeveloped land along Lualualei Naval Access Road, increasing requirements for roadway maintenance.

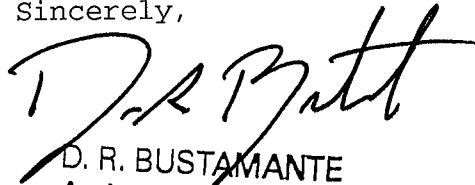
5. Tropic Land LLC doesn't have legal use of Lualualei Naval Access Road. Currently, their legal access is via Hakimo Road with only an easement to cross Lualualei Naval Access Road. Navy has offered Tropic Land LLC an annual license agreement, like the Navy has with other private businesses that use the road, but Tropic Land LLC has yet to agree to the license.
6. Traffic mitigation measures seem to only address the Farrington Highway and Lualualei Naval Access Road intersection. The document needs to address any required mitigation measures along Lualualei Naval Access Road to accommodate increased traffic proposed by this project; i.e., would road lighting be required for night use of Lualualei Naval Access Road?
7. Report identifies mitigation measures to widen Lualualei Naval Access Road to provide double left-turn lanes and exclusive right-turn lane, but doesn't address how such a project would be accomplished. Also, unsure of comment that Tropic Land LLC would provide a "fair share" arrangement to construct improvements to accommodate project build-out.
8. The Draft EIS discusses compatibility with various land use plans, but does not address encroachment issues with the Naval Magazine Ammo Storage Facilities. The Navy strongly encourages Tropic Land LLC to consider the encroachment effects on NAVSTA PH, LLL Annex. Specifically, development at the site will increase the risk of security breaches, fire, and spread of invasive species. We recommend that Tropic Land LLC mitigate the risk of security breaches by providing its tenants with clear objectives to keep their employees and associates from violating security restrictions.
9. The proposed firebreak has the potential to reduce the risk of spread of small fires. However, in high winds or other high-fire risk environmental conditions, a fire can breach the firebreak and spread onto Navy lands. Fire can damage Navy structures adjacent to Tropic Land LLC property, and also spread into higher elevations, putting at risk populations and critical habitat of rare, threatened, and endangered plant and animal species. We recommend installation and maintenance of a much wider firebreak, and also request establishing protocols if a fire generated on Tropic Land LLC property burns Navy facilities and/or sensitive habitat on Navy lands.

5090
Ser OPHE2/ 00120
03 FEB 2010

10. Landscaping at the new development has not been discussed in the DEIS. Invasive plants have the potential of crossing boundaries and affecting sensitive habitat on Navy lands. We recommend that only non-invasive and/or native plants are used for landscaping.
11. Feral and/or stray cats have been shown to have detrimental effects on Hawaii's unique birdlife. NAVSTA PH, LLL Annex actively maintains wildlife habitat, in-part through trapping of feral cats, for five Endangered Hawaiian birds: the Hawaiian Stilt, Hawaiian Moorhen, Hawaiian Coot, Hawaiian Duck, and the Oahu Elepaio. We request that the DEIS state requirements that Tropic Land LLC tenants/buyers will not feed or in anyway promote the expansion of feral/stray cat numbers adjacent to Navy lands.

Thank you for providing us the opportunity to comment on the Draft EIS. Please contact Mr. Steve Johnston at (808) 471-1171 extension 270 for questions regarding real-estate negotiations for road use, Ms. Janice Fukawa at (808) 473-4137 extension 232 for other issues regarding encroachment, and Ms. Patricia Colemon at (808) 473-4137 extension 224 for any environmental issues.

Sincerely,



D. R. BUSTAMANTE
Acting



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. D. R. Bustamante
Department of the Navy
Naval Facilities Engineering Command, Hawaii
400 Marshall Road
Pearl Harbor, HI 96860-3139

Dear Mr. Bustamante:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated February 3, 2010 [5090 Ser OPHE2/00120]. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. When referring to the Navy's installation at Lualualei, please refer to its proper name: Joint Base Pearl Harbor Hickam (JBPH) Lualualei Annex (LLL Annex). Commands within this area are: Navy Munitions Command, East Asia Division, Pearl Harbor Detachment (NMC EAD PH) and Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS PAC). Please provide correct location and/or command references throughout the document.

Response: Comment noted and appropriate sections of the FEIS have been changed.

1600 Kapiolani Blvd., Suite 1610
Honolulu, HI 96814
Tel: 808 944-8848 • Fax: 808 941-8999

2. NAVSTA PH, LLL Annex¹ is developed with ordnance storage facilities and receiver towers. This land use is inaccurately noted on page 5-7, section 5.3 paragraphs 2 and 5, as an “urban type activity” (concentration of people, structures, etc.). The nature of the type of activities at LLL Annex necessitates a low concentration of people and properly constructed and sited ammunition storage facilities and antenna. Please revise this description and analysis accordingly.

Response: The land use description (on pages 6-7 in the FEIS) has been revised to clarify that JBPHH, Lualualei Annex is not in the State Urban District and the reference to “urban type activity” has been deleted.

Text from the FEIS (p. 6-7):

The project site is contiguous to ~~the Naval Munitions Center (NMC) Lualualei JBPHH Lualualei Annex,~~ a military ordnance storage and communications facility, which although not in the Urban District, ~~is an urban type activity~~ has elements of techno-industrial urban type activity. It is also very close to industrial lands owned by Pineridge Farms and the PVT Land Company, which are in the Urban District. The WSCP was in the process of being updated when this ~~DEIS~~ FEIS was prepared, and an application is pending to change the Rural Community Boundary to incorporate the proposed industrial park site. The Department of Planning and Permitting’s Draft Wai‘anae Sustainable Communities Plan Revision for 2009 identifies “industrial” as an alternative land use for this site. The project directly supports the Wai‘anae Sustainable Communities Plan’s stated Community Values to provide economic choices in Wai‘anae, including jobs in Wai‘anae which will allow families to spend less time commuting.

3. The DEIS declares Lualualei Naval Access Road, a military roadway, as the primary access for the project. The project will generate vehicular traffic (primarily trucks) on Lualualei Naval Access Road. This increased usage, over time, will require increased roadway maintenance and repair, with costs borne by the Navy. Civilian use of this roadway also increases the Navy’s exposure to liability.

Response: The US Navy has agreed to grant an association of adjoining property owners, including Tropic Land, a long-term easement to use Lualualei Naval Access Road. The easement agreement would require the private users to maintain Lualualei Naval Access Road and to insure the Navy against liability.

¹ Although the February 3, 2010 letter refers to “NAVSTA Ph, LLL Annex,” NAVFAC planner Aaron Hebshi has confirmed that the correct reference is “JBPH, LLL Annex” as indicated in Item 1. Telephone conversation, April 5, 2010.

Text from the FEIS (p. 1-2):

Tropic Land is currently discussing the form of a definitive access agreement with the Navy. The Navy has agreed to grant a long term easement to use Lualualei Naval Access Road to an association to be organized by the adjoining property owners, including Tropic Land LLC, who would be required to maintain the road.

4. This project will require an amendment to the State's Land Use District from "Agricultural" to "Urban" and a change in zoning from Preservation (P-2) to Limited (I-1). Approval of these amendments may set a precedent for similar land use conversions on the remaining undeveloped land along Lualualei Naval Access Road, increasing requirements for roadway maintenance.

Response: The project owner recognizes that the proposed light industrial park will affect roadway conditions and is committed to mitigating project impacts.

5. Tropic Land LLC doesn't have legal use of Lualualei Naval Access Road. Currently, their legal access is via Hakimo Road with only an easement to cross Lualualei Naval Access Road. Navy has offered Tropic Land LLC an annual license agreement, like the Navy has with other private businesses that use the road, but Tropic Land LLC has yet to agree to the license.

Response: In addition to offering a long-term easement agreement, NAVFAC staff has offered Tropic Land the same annual license agreement that the Navy has extended to other adjoining property owners.

Text from the FEIS: See Appendix K for correspondence between Tropic Land and the U.S. Navy regarding Lualualei Naval Access Road.

6. Traffic mitigation measures seem to only address the Farrington Highway and Lualualei Naval Access Road intersection. The document needs to address any required mitigation measures along Lualualei Naval Access Road to accommodate increased traffic proposed by the project; i.e., would road lighting be required for night use of Lualualei Naval Access Road?

Response: Specific improvement measures for Lualualei Naval Access Road will be determined in consultation with the Navy.

Text from the FEIS (p. 5-42):

Improvements to Lualualei Naval Access Road itself will be determined in consultation with the U.S. Navy as part of the negotiations for an easement to use, operate and maintain the road.

7. Report identifies mitigation measures to widen Lualualei Naval Access Road to provide double left-turn lanes and exclusive right-turn lane, but doesn't address how such a project would be accomplished. Also, unsure of comment that Tropic Land LLC would provide a "fair share" arrangement to construct improvements to accommodate project build-out.

Response: Detailed plans for roadway improvements and implementation will be determined in consultation with the Navy and other adjoining property owners. Tropic Land is committed to mitigation measures that may be required of the project.

Text from the FEIS (p. 5-41):

To mitigate the impacts of project-generated traffic, Tropic Land will discuss traffic mitigation measures with the State and City, and is willing to participate in a fair share arrangement with the State of Hawaii and other users of Lualualei Naval Access Road to improve the intersection of Farrington Highway and Lualualei Naval Access Road.

8. The Draft EIS discusses compatibility with various land use plans, but does not address encroachment issues with the Naval Magazine Ammo Storage Facilities. The Navy strongly encourages Tropic Land LLC to consider the encroachment effects on NAVSTA PH, LLL Annex. Specifically, development at the site will increase the risk of security breaches, fire, and spread of invasive species. We recommend that Tropic Land LLC mitigate the risk of security breaches by providing its tenants with clear objectives to keep their employees and associates from violating security restrictions.

Response: Tropic Land and the condominium owners association will have rules and regulations concerning security breaches of the neighboring Navy property, fire prevention, and invasive species.

Text from the FEIS (p. 5-24):

In response to concerns from the Navy regarding invasive plant species, Tropic Land will limit landscaping of common areas to non-invasive and/or native plants. CC&Rs will identify acceptable planting material.

9. The proposed firebreak has the potential to reduce the risk of spread of small fires. However, in high winds or other high-fire risk environmental conditions, a fire can breach the firebreak and spread onto Navy lands. Fire can damage Navy structures adjacent to Tropic Land LLC property, and also spread into higher elevations, putting at risk populations and critical habitat of rare, threatened, and endangered plant and animal species. We recommend installation and maintenance of a much wider firebreak, and also request establishing protocols if a fire generated on Tropic Land LLC property burns Navy facilities and/or sensitive habitat on Navy lands.

Response: In addition to the proposed fire break, Tropic Land will comply with requirements of the Honolulu Fire Department and Board of Water Supply for a water supply that is adequate for fire flow protection, fire hydrants and other apparatus, and fire equipment access routes.

Text from the FEIS (p. 5-62 and 5-68):

By letter dated July 2, 2009, BWS indicated that installation of a new 16-inch water main will provide adequate fire flow to the proposed industrial development.

New water lines, fire hydrants, and emergency access will be constructed by Tropic Land as prescribed by the Honolulu Fire Department and Board of Water Supply. The 100-foot buffer along the *mauka* boundary of the proposed development is intended to serve as a fire break. These improvements will accommodate the fire protection needs of the proposed industrial park. No short- or long-term adverse impacts to fire protection capability are anticipated.

10. Landscaping at the new development has not been discussed in the DEIS. Invasive plants have the potential of crossing boundaries and affecting sensitive habitat on Navy lands. We recommend that only non-invasive and/or native plants are used for landscaping.

Response: The FEIS states that non-invasive and/or native plants be used for project landscaping to mitigate potential adverse effects on sensitive habitats.

Text from the FEIS (p. 5-25):

In response to concerns from the Navy regarding invasive plant species, Tropic Land will limit landscaping of common areas to non-invasive and/or native plants. CC&Rs will identify acceptable planting material.

11. Feral and/or stray cats have been shown to have detrimental effects on Hawaii's unique birdlife. NAVSTA PH, LLL Annex actively maintains wildlife habitat, in part through trapping of feral cats, for five Endangered Hawaiian birds: the Hawaiian Stilt, Hawaiian Moorhen, Hawaiian Coot, Hawaiian Duck, and the Oahu Elepaio. We request that the DEIS state requirements that Tropic Land LLC tenants/buyers will not feed and in any way promote the expansion of feral/stray cat numbers adjacent to Navy lands.

Response: A prohibition against feeding or promoting stray/feral cats has been included in the FEIS as a measure to mitigate potential adverse effects on sensitive habitats.

Text from the FEIS (p. 5-26):

The project will not have any adverse effect on any endemic ecosystem or on any endangered or threatened animal species in the area. In support of wildlife habitats maintained within the JBPHH Lualualei Annex, Tropic Land and occupants of the industrial park will not be permitted to feed or promote the expansion of feral or stray cat populations that could have detrimental effects on avian species.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

RECEIVED
LAND DIVISION



2010 JAN -4 A 10: 201

LAURA H. THIELEN
CHAIRPERSON
WILLIAM D. BALFOUR, JR.
SUMNER ERDMAN
NEAL S. FUJIWARA
CHIYOME L. FUKINO, M.D.
DONNA FAY K. KIYOSAKI, P.E.
LAWRENCE H. MIKE, M.D., J.D.

KEN C. KAWAHARA, P.E.
DEPUTY DIRECTOR

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

December 30, 2009

REF: Nanakuli community baseyard DEIS.dr

TO: Morris Atta, Administrator
Land Division

FROM: Ken C. Kawahara, P.E., Deputy Director
Commission on Water Resource Management

SUBJECT: Draft Environmental Impact Statement for Nanakuli community Baseyard, Oahu

FILE NO.: NA
TMK NO.: 8-7-9:02

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. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense/pp/index.htm>.
- 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.

- 6. We recommend the use of alternative water sources, wherever practicable.
- 7. 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 http://hawaii.gov/dlnr/cwrn/resources_permits.htm.

- 8. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water.
- 9. A Well Construction Permit(s) is (are) required any well construction work begins.
- 10. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- 11. 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.
- 12. Ground water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 13. A Stream Channel Alteration Permit(s) is (are) required before any alteration(s) can be made to the bed and/or banks of a stream channel.
- 14. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is (are) constructed or altered.
- 15. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 16. 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.
- OTHER:

If there are any questions, please contact Lenore Ohye at 587-0216.

LO:sd



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Ken C. Kawahara
Deputy Director
Commission on Water Resource Management
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Kawahara:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by memorandum dated December 30, 2009. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify the comments made.

Comments are numbered according to checked items from your list.

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.

Response: The civil engineer for this project has consulted with the Honolulu Board of Water Supply and will continue to coordinate with the agency through final design and the acquisition of applicable permits.

Text from the FEIS (p. 5-62): By letter dated July 2, 2009, BWS indicated that installation of a new 16-inch water main will provide adequate fire flow to the proposed industrial development. Design and construction of the drinking water distribution system will be in accordance with BWS Standards.

4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit toward Leadership in Energy and Environmental Design (LEED) certification.

Response: As master developer, Tropic Land will incorporate water-saving technologies to the facilities it is directly responsible for, such as the wastewater treatment facility and irrigation system.

Text from the FEIS (p. 5-62): To reduce the demand for drinking water, non-drinking water—treated wastewater effluent—will be used for irrigation. Another water-saving measure is the requirement that industrial park businesses that wash fleet vehicles on-site install systems that recycle wash water. This requirement would also be administered through the CC&Rs.

5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification.

Response: BMPs for stormwater management will be studied in detail during the design phase of the project. Appropriate measures will be incorporated into the construction plans.

Text from the FEIS (p. 5-14): During the detailed design of infrastructure, the consulting engineer will work with the City to confirm necessary water quality standards and develop an effective set of Best Management Practices (BMPs) for the project. The objective of the water quality BMPs is to mitigate the impact of pollutants (sediment, grit, oil, heavy metals) that could potentially enter the drainage system from frequent, smaller rainfalls. Plants and landscaping will be incorporated into the design to absorb particles and filter heavy metals. Additional water quality BMPs include the construction of infiltration swales along the roadway. These swales collect runoff, filter particles, and provide infiltration to recharge the groundwater.

6. We recommend the use of alternative water sources, wherever practicable.

Response: Preliminary engineering plans provide for the use of properly treated recycled water for irrigation purposes.

Text from the FEIS (p. 5-62): To reduce the demand for drinking water, non-drinking water—treated wastewater effluent—will be used for irrigation.

7. 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.

Response: Construction and operation of the on-site wastewater treatment facility will be conducted with approval from and in accordance to the standards of the Hawaii State Department of Health. Tropic Land will comply with all requirements related to water quality.

Text from the FEIS (p. 5-63): The proposed on-site wastewater collection system is illustrated in Figure 5 (Chapter 3). Gravity sewers will be located within sewer easements. Preliminary pipe line sizes range from 8 to 10 inches in diameter. Design and construction of the system will be in accordance with standards established by the City and County and State Department of Health.

11. 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.

Response: There are no plans to use the existing on-site wells, which are capped.

Text from the FEIS (p. 5-7): The previous owner, Oban, had drilled two wells with the expectation of tapping groundwater as a source of irrigation water for the proposed golf course and nursery. Groundwater will not be used for the proposed light industrial park and the existing wells will remain capped.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

LINDA LINGLE
GOVERNOR



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

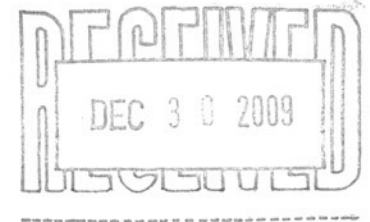
BRENNON T. MORIOKA
DIRECTOR

Deputy Directors
MICHAEL D. FORMBY
FRANCIS PAUL KEENO
BRIAN H. SEKIGUCHI
JIRO A. SUMADA

IN REPLY REFER TO:

STP 8.3488

December 23, 2009



Mr. Glenn Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96813

Dear Mr. Kimura:

Subject: Nanakuli Community Baseyard
Draft Environmental Impact Statement (DEIS)

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project.

DOT understands the subject project's developer, Tropic Land LLC, proposes to construct a 96-acre industrial park on a 236-acre parcel consisting of approximately 41 lots, averaging two acres each. The proposed industrial park would be located on the east side of the U.S. Navy's Lualualei Naval Access Road (LNAR), approximately two miles mauka of the State highway, Farrington Highway. Further, the developer has been negotiating with the Navy to use LNAR for the park's access to Farrington Highway in lieu of the existing access via Hakimo Road with a currently held easement to cross LNAR at the park entrance. The subject project proposes to have a single, secured entry on LNAR and a secondary access for fire and emergency purposes.

DOT previously commented on this project in its letter, STP 8.3296 dated June 17, 2009 (attached), to the State Land Use Commission (LUC) during the preparation notice period. DOT had requested that a Traffic Impact Analysis Report (TIAR) be prepared and notes that it is included in the subject project as Appendix E.

DOT Highways Division finds that the TIAR is inadequate. The TIAR should be revised to address the following concerns and resubmitted to the DOT for review.

1. The TIAR fails to mention that the Farrington Highway and LNAR intersection is signalized and that it will serve as the project access. This should be described in more detail.

2. While the TIAR mentions the Institute of Transportation Engineers (ITE) Trip Generation Manual, it does not provide a table or information showing what the assumed uses were or what trips they would generate. This should be corrected.
3. The information contained in Table 2. Trip Assignment, is not consistent with that in Figure 7. PM Vehicle Peak Hour (VPH) Traffic Assignment. This should be corrected.
4. While the TIAR recommended improvements in Chapter 4 that would mitigate project generated traffic impacts, there was no discussion of the proposed improvements.
5. The information contained in Table 3. Capacity Analysis - Farrington Highway and Lualualei Naval Access Road, shows an unintuitive result. The Northbound Through/Northbound Right (NBT/NBR) PM Peak (with project) without improvements is shown as Level of Service (LOS) F, yet with improvements will result in LOS D. The recommended improvements have little to do with the NB movement, yet it states that they will cause such a reduction. This should be explained. In addition, LOS using only delays yields incongruous results. For instance, $V/C=1.00$ is nominally LOS E, if not incipient F, and not D even if delays were in the 43 second (LOS D) range.

DOT appreciates the opportunity to provide comments. If there are any other questions, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at telephone number (808) 587-2356.

Very truly yours,



BRENNON T. MORIOKA, Ph.D., P.E.
Director of Transportation

Attach.

- c: Theodore E. Liu, Department of Business, Economic Development and Tourism
Abbey Seth Mayer, Office of Planning, DBEDT
Katherine Kealoha, Office of Environmental Quality Control
Dan Davidson, Land Use Commission



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Brennon T. Morioka
Director
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813

Dear Mr. Morioka:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated December 23, 2009. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify the comments made.

Comments are numbered according to checked items from your list. Revisions to the DEIS are shown by strikethrough and underlined text.

1. The TIAR [Traffic Impact Assessment Report] fails to mention that the Farrington Highway and LNAR [Lualualei Naval Access Road] intersection is signalized and that it will serve as the project access.

Response: The description of Farrington Highway and Lualualei Naval Access Road has been revised. See TIAR dated January 29, 2010 (enclosed), p. 4; also, Appendix E of the FEIS.

Text from FEIS (p. 5-38): Farrington Highway is signalized at Lualualei Naval Access Road.

2. While the TIAR mentions the Institute of Transportation Engineers (ITE) Trip Generation Manual, it does not provide a table or information showing what the presumed uses were or what trips they would generate.

Response: This information has been added to Table 2, Trip Generation Characteristics. See TIAR, p. 10.

1600 Kapiolani Blvd., Suite 1610
Honolulu, HI 96814
Tel: 808 944-8848 • Fax: 808 941-8999

Table from Appendix E, TIAR (p. 10):

Trip Generation Characteristics

Land Use (ITE Code)	Peak Hour	Direction	Vehicle Trips/Hour
Industrial Use (130)	AM	Enter	433
		Exit	89
		Total	522
	PM	Enter	109
		Exit	409
		Total	518

3. The information contained in Table 2. Trip Assignment, is not consistent with that in Figure 7. PM Vehicle Peak Hour (VPH) Traffic Assignment.

Response: The revised TIAR clarifies the Traffic Assignment information. See Table 3 on p. 10.

Table 12 from FEIS (p. 5-41) and Table 3 from TIAR (p. 10):

Traffic Assignment

Peak Hour	Direction	Northbound	Southbound
AM	Enter	75%	25%
	Exit	15%	85%
PM	Enter	85%	15%
	Exit	25%	75%

4. While the TIAR recommended improvements in Chapter 4 that would mitigate project generated traffic impacts, there was no discussion of the proposed improvements.

Response: Section 4.9 of the Final EIS describes the proposed mitigation measures.

Text from FEIS (p. 5-41):

Improvements recommended by the Traffic Impact Analysis Report (TIAR) and the project engineer include:

- Widening of southbound Farrington Highway to provide an exclusive left-turn lane (350 feet in length and 11 feet in width)
- A tapered median area (300 feet in length) along northbound Farrington Highway to align with the southbound left-turn lane
- Widening Lualualei Naval Access Road to provide double left-turn lanes (350 feet in length; 11 feet in width) and an exclusive right-turn lane
- Relocation of existing traffic signals, utility poles, and drainage structures affected by the widening

5. The information contained in Table 3. Capacity Analysis—Farrington Highway and Lualualei Naval Access Road, shows an unintuitive result. The Northbound Through/Northbound Right (NBT/NBR) PM Peak (with project) without improvements is shown as Level of Service (LOS) F, yet with improvements will result in LOS D. The recommended improvements have little to do with the NB movement, yet it states that they will cause such a reduction. This should be explained. In addition, LOS using only delays yields incongruous results. For instance, $V/C=1.00$ is nominally LOS E, if not incipient F, and not D even if delays were in the 43 second (LOS D) range.

Response: Worksheets showing the capacity analysis for the proposed improvements have been appended to the TIAR.

Text from TIAR: Please see TIAR (attached).

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Attachment

Cc: Arick Yanagihara, Tropic Land LLC (without attachment)
Dan Davidson, Land Use Commission (without attachment)

LINDA LINGLE
Governor



ORLANDO "DAN" DAVIDSON
Executive Officer

LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawai'i

January 5, 2010

RECEIVED JAN 06 2010

Mr. Glenn T. Kimura
Kimura International, Inc.
1600 Kapiolani Boulevard, Suite 1610
Honolulu, Hawaii 96814

Dear Mr. Kimura:

Subject: Docket No. A09-782
Draft Environmental Impact Statement (DEIS)
Nanakuli Community Baseyard
Lualualei, Oahu, Hawaii
Tax Map Key: 8-7-09: por. 2

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

- 1) In accordance with §11-200-17(f), Hawaii Administrative Rules ("HAR"), alternatives to the proposed action should be described in a separate and distinct section. We acknowledge that section 3.2 of the DEIS addresses various alternatives; however, this discussion does not appear to be an objective evaluation in that the alternatives presented are primarily discussed in a negative context relative to the proposed development. Please also include a discussion of 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. We also request that the discussion be supplemented to specifically address alternative locations for the proposed development with an appropriate summary included in the Summary Sheet.
- 2) In accordance with §11-200-17(g), HAR, a description of the environmental setting should be provided. We note that a truck farming operation existed on the property in the 1980s, voluntarily closing in 1988. Clarification should be provided on the uses, if any, that existed on the property prior to this timeframe. We also note that a 100-foot-wide buffer is proposed to be constructed along the mauka boundary of the property to address potential

rockfalls from the slopes behind the proposed development. Given that the buffer has yet to be engineered and will not be until the project design phase, clarification should be provided as to why it was chosen over other mitigative measures, such as the use of nets or chains to secure existing boulders, the removal of the boulders themselves, and the installation of fencing uphill from the proposed improvements. Was a formal rockfall hazard and slope stability analysis prepared to accurately quantify the risk of hazard that exists and to determine the efficacy of the proposed buffer?

- 3) In accordance with §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 §11-200-17(i), HAR, the probable impact of the proposed action on the environment shall be included. We note that both the biological surveys and traffic impact analysis report are identified as *Draft* documents. Please clarify when the respective final reports will be available for review. Review of the DEIS also indicates that no inventory and assessment of arthropods on the property was conducted. Although the location of the property may not require that a comprehensive arthropod study be conducted, we request that this matter be addressed in the interest of full environmental disclosure.

We further note that the DEIS contains statements relative to the proposed development's impacts upon the air quality and ambient noise levels of the area; however, there are no studies in the DEIS on which these conclusions are based. Given the technical and scientific nature of these issues, it has been customary to assess existing conditions and potential impacts and mitigation measures based on studies conducted by experts in the respective fields. As such, we request that, at a minimum, the statements be affirmed by acknowledged experts in the fields in question. In the alternative, the statements should be comprehensively supported by published studies that have addressed the impacts upon air quality and ambient noise levels from projects on Oahu that are similar to the proposed development.

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

Additionally, we believe that the proposed development would generate revenues to the State and the City and County of Honolulu as well as require governmental operating expenditures to support it. However, there is no

economic and fiscal analysis of the proposed development in the DEIS. Accordingly, we request that an analysis that addresses the projected revenues and expenses of the development be provided. The analysis should include a discussion on the various revenues, including personal income, general excise, and real property taxes, that would be generated. Similarly, the analysis on governmental expenditures should include, but not be limited to, the following areas: roadways (improvements and maintenance), public safety, health and sanitation; human services; recreation; debt service; and government employee benefits.

Finally, §11-200-17(i), HAR, requires that the interrelationships and cumulative environmental impacts (both direct and indirect) of the proposed action and other related projects be discussed, including the potential secondary effects. Although the proposed development is represented to be self-contained and not related to any other project, we believe that the discussion in section 6.4, *Secondary and Cumulative Impacts*, in the DEIS (p. 6-3) is inadequate as it does not examine the potential impacts of the proposed development in conjunction with existing and planned uses in the area that do or will utilize the region's infrastructure and services regardless of their relationship with the proposed development.

- 5) In accordance with §11-200-17(k), HAR, a description of all irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented should be provided. This description should address the possibility of environmental accidents resulting from any phase of the action. While we acknowledge that the issue of hazardous wastes (including their handling, storage, treatment, transport, and disposal), their potential impact on the environment, and measures to mitigate such impact are addressed in section 4.15.4, *Solid Waste Disposal Facilities*, we request that such discussion also be included in section 6.5, *Irreversible and Irretrievable Commitments of Resources*.
- 6) In accordance with §11-200-17(n), HAR, a separate and distinct section that summarizes unresolved issues, including a discussion of how such issues will be resolved prior to commencement of the action or of the overriding reasons to proceed without resolution of the issue, should be provided. We note that the U. S. Navy's authorization to extend access to Petitioner and its buyers to use the Lualualei Naval Access Road remains an outstanding issue to the extent that the form of the definitive access agreement has not been agreed upon. A timeframe of when such agreement is anticipated to be reached in relation to the development schedule of the proposed action should be provided. We suggest that the July 6, 2009, letter from the U. S.

Mr. Glenn T. Kimura

January 5, 2010

Page 4

Navy Region Hawaii Commander to Petitioner transmitting a written offer for an annual license agreement, with the possibility of automatic extensions to use the access road, be provided in the interest of full disclosure.

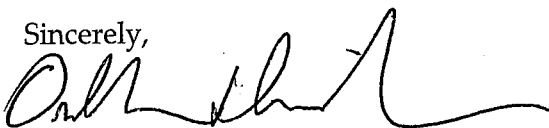
- 7) In accordance with §11-200-17(p), HAR, the DEIS should include a separate and distinct section that contains reproductions of all substantive comments and responses made during the EISPN consultation process. Review of the DEIS indicates that while Chapter 8 includes comments on the EISPN, the individual responses to each comment are not included. Please ensure that the Final EIS includes these responses.

- 8) In the DEIS, there are numerous references to the terms *potable water* and *non-potable water*. We request that it be replaced by the term *drinking water* and *non-drinking water*, respectively. We have been advised that although potable water has generally been used to mean drinking water, the Department of Health (DOH) uses the latter term specifically to indicate water for human consumption that is derived from surface water and/or groundwater and is regulated by the DOH pursuant to chapter 11-20, HAR.

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,



ORLANDO DAVIDSON

Executive Officer

c: Arick Yanagihara, Tropic Land LLC



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Orlando Davidson
Executive Officer
Land Use Commission
235 South Beretania Street, Suite 406
Honolulu, HI 96813

Dear Mr. Davidson:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 5, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify the comments made.

Comments are numbered according to the items in your letter.

1. In accordance with §11-200-17(f), Hawaii Administrative Rules (“HAR”), alternatives to the proposed action should be described in a separate and distinct section. We acknowledge that section 3.2 of the DEIS addresses various alternatives; however, this discussion does not appear to be an objective evaluation in that the alternatives presented are primarily discussed in a negative context relative to the proposed development. Please also include a discussion of 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.

We also request that the discussion be supplemented to specifically address alternative locations for the proposed development with an appropriate summary included in the Summary Sheet.

Response: Discussions of the proposed action and alternatives to the proposed action have been split into separate chapters in the FEIS. Chapter 3 focuses on the proposed action, while Chapter 4 reviews other alternatives considered during the planning process. As explained in the Preface, some chapters have been re-numbered in the FEIS to accommodate the separation, but the contents of those chapters remain substantially unchanged.

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There is no other site on the Waianae Coast that is zoned for the development of a light industrial park.

Text from the FEIS (p. Summary-1 and 4-5):

The possibility of a light industrial park was raised through consultation with community members, who noted the Wai‘anae Coast’s growing residential population and labor force, yet limited employment and economic opportunities. There is no other site on the Wai‘anae Coast that is zoned for the development of a light industrial park.

4.4 Alternative Locations for the Light Industrial Park

Private, undeveloped land zoned for industrial use is unavailable on the Wai‘anae Coast (see Figure 23). Except for less than 5 acres in Wai‘anae Town, all other industrial land is used for public or quasi-public purpose, or supports an ongoing business. Therefore, implementing Tropic Land’s concept of industrial space for the “employment and service needs of rural and suburban communities”—as the I-1, Limited Industrial District is defined in the City and County of Honolulu’s Land Use Ordinance—is not possible without rezoning and, likely, redistricting.

2. In accordance with §11-200-17(g), HAR, a description of the environmental setting should be provided. We note that a truck farming operation existed on the property in the 1980s, voluntarily closing in 1988. Clarification should be provided on the uses, if any that existed on the property prior to this timeframe.

Response: Interviews were conducted with three people who have first-hand knowledge of and/or experience with farming activities on the project site. Their statements have been appended to the FEIS (Appendix L). The historical information dates back approximately 60 years, during which the site accommodated two small truck farms. The Araki farm lasted approximately 25 years on 17 acres, followed by the brief tenure of the Higa farm which ceased operations in 1988. The truck farms experimented with corn, watermelon, round onions, bell peppers, cucumber, tomatoes, and green onions. The Arakis tried a variety of intensive farming methods and diversified by herding goats and keeping beehives. No crop was successful due to adverse growing conditions. Although the Arakis operated successful farms in Makaha—both before and after their Lualualei experience—farming on the project site was unprofitable.

Text from the FEIS (p. 4-4):

Farm Lots. Agricultural land use, either as a single operation or multiple farm lots was suggested initially by members of the Waianae Neighborhood Board and mentioned in some of the DEIS comments. Long-term use for agricultural purposes was dismissed as

an alternative based on the agricultural consultant's report and information obtained from individuals who previously farmed the project site. Following publication of the DEIS, Tropic Land further investigated the history of farming on the project site. Interviews were conducted with three men who have first-hand experience in farming the property. Appendix L contains oral histories provided by:

- Tadashi Araki, who, with his brother, farmed the site for approximately 25 years, ending in the early 1980s
- Sonny Bradley, who helped to install the irrigation system on the Araki farm, and whose relatives worked for the Arakis
- Albert Silva, whose *ohana* previously owned the property, who has been on the property since childhood, who raised cattle on a portion of the property, and who was employed at the Naval reservation, now known as JBPHH Lualualei Annex

A common theme of the interviews was the inability of the stony, adobe soil to support productive farm activity. Mr. Araki's account details the intensive practices used to achieve a viable farm, including soil conditioning and amendments, pest control, experiments with different types of crops and auxiliary agricultural products, and advice from technical experts.

The poor outcomes obtained by the Araki brothers are consistent with Tropic Land's own experience with on-site horticultural production. Since 2007, Tropic Land has cultivated a variety of palm trees in an attempt to landscape the setback areas. Despite soil amendments, fertilization, and irrigation, tree growth is stunted. There is no evidence that farming would be a sustainable enterprise given the particular conditions of this site. Therefore, agriculture is not considered a viable alternative.

We also note that a 100-foot-wide buffer is proposed to be constructed along the mauka boundary of the property to address potential rockfalls from the slopes behind the proposed development. Given that the buffer has yet to be engineered and will not be until the project design phase, clarification should be provided as to why it was chosen over other mitigative measures, such as the use of nets or chains to secure existing boulders, the removal of the boulders themselves, and the installation of fencing uphill from the proposed improvements. Was a formal rockfall hazard and slope stability analysis prepared to accurately quantify the risk of hazard that exists and to determine the efficacy of the proposed buffer?

Response: A geotechnical study by a licensed engineer will be conducted during the design phase of the project. The project owner expects to implement the recommendations of the study.

Text from the FEIS (p. 5-17):

A licensed geotechnical engineer will be retained to prepare a rockfall and slope stability analysis and to design the channel during the project design phase. Tropic Land anticipates complying with the recommendations of the rockfall and slope stability analysis, including other mitigation measures that would be implemented during construction.

3. In accordance with §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.

Response: The list of possible permits, approvals, and requirements for regulatory compliance in Section 1.6 has been revised to include projected submittal dates.

Text from the FEIS (p. 1-9):

	<u>Anticipated Date for Application Submittal</u>
Federal <ul style="list-style-type: none"> • U.S. Army Corps of Engineers, Jurisdictional Determination (Ulehawa Stream) • <u>Lualualei Naval Access Road Lease of Easement</u> 	<u>Completed</u> <u>2010</u>
State of Hawai'i <ul style="list-style-type: none"> • State Land Use Commission, State Land Use District Boundary Amendment • Department of Health, Section 402, Clean Water Act, National Pollutant Discharge Elimination System (NPDES) Permit 	<u>2010</u> <u>2011</u>
City and County of Honolulu <ul style="list-style-type: none"> • Wai'anae Sustainable Communities Plan, Amendment • Zoning Change (from P-2 Preservation to I-1 Industrial) • Grading Permit • Building Permit 	<u>2010</u> <u>2011</u> <u>2011</u> <u>2011</u>

4. In accordance with §11-200-17(i), HAR, the probable impact of the proposed action on the environment shall be included. We note that both the biological surveys and traffic impact analysis report are identified as *Draft* documents. Please clarify when the respective final reports will be available for review. Review of the DEIS also indicates that no inventory and assessment of anthropods on the property was conducted. Although the location of the property may not require that a comprehensive study be conducted, we request that this matter be addressed in the interest of full environmental disclosure.

Response: Final versions of the biological surveys (Appendix D) and traffic study (Appendix E) are included in the FEIS. A discussion of anthropods has been added to the FEIS in Section 5.6 on wildlife resources.

Text from the FEIS (p. 5-25):

Anthropods. A comprehensive study of anthropods or insects was not conducted for this EIS. However, biologist, Reginald David, was consulted on the possibility of that any protected insect species might be endangered by the proposed action. According to Mr. David, the only listed species that could be affected is the Blackburn's Hawk Moth (*Manduca blackburni*), which has not been seen on the island O'ahu since the early 1930s. Because the project site has been disturbed by wildfires so many times, impact on threatened or endangered anthropods is not a concern.

We further note that the DEIS contains statements relative to the proposed development's impact upon the air quality and ambient noise levels of the area; however, there are no studies in the DEIS on which these conclusions are based. Given the technical and scientific nature of these issues, it has been customary to assess existing conditions and potential impacts and mitigation measures based on studies conducted by experts in the respective fields. As such, we request that, at a minimum, the statements be affirmed by acknowledged experts in the fields in question. In the alternative, the statements should be comprehensively supported by published studies that have addressed the impacts upon air quality and ambient noise levels from projects on Oahu that are similar to the proposed development.

Response: Section 5.10 on air quality and Section 5.11 on noise have been expanded. The new material references previously published air quality and noise studies that support the conclusions reached in the EIS.

Text from the FEIS (p. 5-45 and 5-50):

Long-term Air Quality Impacts [p. 5-45]

Long-term air quality impacts from project operation are not expected to be significant. This conclusion is based, in part, on the findings of an air quality study conducted for an

industrial park project known as Kapolei Harborside Center.¹ This project involves approximately 345 acres and is anticipated to provide 3,800 permanent jobs at full buildout and occupancy. The project area is surrounded by major roads, including Kalaeloa Boulevard and Kapolei Parkway and is situated adjacent to Campbell Industrial Park in Ewa, where “several large industrial sources of air pollution are located” (B. D. Neal and Associates, 2006: 26). Computerized emission and atmospheric dispersion models were used to estimate ambient carbon monoxide concentrations along roadways leading to and from the project. Carbon monoxide was selected for modeling because it is the most stable and most abundant of pollutants generated by motor vehicles, and considered a pollutant that can be addressed locally. The models estimated worst-case 1-hour and 8-hour concentrations. All of the predicted concentrations were within State and federal air quality standards.

In comparison, Nānākuli Community Baseyard is approximately one-fourth the size of Kapolei Harborside Center. Nānākuli Community Baseyard occupies an area that is 27% of Harborside’s acreage, and its high-end employment projection is 22% of Harborside’s projection. Given the significantly smaller scale of Nānākuli Community Baseyard, and ambient conditions that are no worse than on the Ewa Plain, Harborside’s air quality study serves as an appropriate reference.

Future Traffic Noise Environment [p. 5-50]

Moderate noises increases generated by project-related traffic and non-project-related traffic are predicted to occur along Lualualei Naval Access Road. Intermittent vehicular noise along this roadway from project-generated traffic would represent a minimal increase in noise. For most sources, a doubling of distance results in a dBA fall in noise level. The closest noise sensitive receptor in the project area is a single residence set back from Lualualei Naval Access Road. Therefore, traffic noise impacts associated with the project are not considered to be significant.

Along Farrington Highway where traffic volumes, speeds, and noise levels are significantly high, the added noise contributions from project-generated traffic should not be significant when compared to non-project traffic noise contributions. Project traffic noise impacts along the highway are not anticipated because of the dominating influence of non-project traffic noise over project-generated traffic noise.

¹ B. D. Neal & Associates. 2006. “Air Quality Study for the Proposed Kapolei Harborside Center Project, Kapolei, Oahu, Hawaii.” Reproduced as Appendix I, Air Quality Assessment in *Kapolei Harborside Center Final Environmental Impact Statement*, Prepared by Group 70 International, Inc. for Kapolei Property Development, LLC, November 2006.

These conclusions are consistent with the findings of an acoustical study conducted for an industrial development project known as Kapolei Harborside Center.² Although Kapolei Harborside Center is almost three times larger in scale than Nanakuli Community Baseyard, the noise models predicted vehicular traffic noise impacts on the surrounding community that are not considered to be significant.

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

Response: Section 5.16.5 on civil defense facilities has been added to the FEIS.

Text from FEIS (p. 5-69):

5.16.5 Civil Defense Facilities

There is no civil defense facility on the project site. However, Tropic Land LLC has provided an access road through its property across the street—on the west side of Lualualei Naval Access Road—that is part of the City and County of Honolulu’s network “back roads” that, together, comprise an emergency access route for Wai‘anae Coast communities.

Impacts and Mitigation Measures

If required by the State Land Use Commission as a condition of reclassification Tropic Land LLC will fund on a fair share basis and construct adequate solar powered civil defense measures to serve the petition area as determined by the State of Hawai‘i Department of Defense and City and County of Honolulu Department of Emergency Management.

Additionally, we believe that the proposed development would generate revenues to the State and the City and County of Honolulu as well as require governmental operating expenditures to support it. However, there is no economic and fiscal analysis of the proposed development in the DEIS. Accordingly, we request that an analysis that addresses the projected revenues and expenses of the development be provided. The analysis should include a discussion on the various revenues, including personal income, general excise, and real property taxes, that would

² D.L.Adams Associates. Ltd. 2006. “Environmental Noise Assessment Report, Kapolei Harborside Center, Kapolei, Oahu, Hawaii.” Reproduced as Appendix J, Acoustic Study in *Kapolei Harborside Center Final Environmental Impact Statement*, Prepared by Group 70 International, Inc. for Kapolei Property Development, LLC, November 2006.

be generated. Similarly, the analysis on governmental expenditures should include, but not be limited to, the following areas: roadways (improvements and maintenance), public safety, health and sanitation; human services; recreation; debt service; and government employee benefits.

Response: A discussion of fiscal impacts has been added to the FEIS; the full study is included as Appendix J. At the State and City levels, revenues derived from various taxes and fees are expected to exceed public costs.

Text from FEIS (p. 5-56):

Fiscal Impacts. An analysis of fiscal impacts was conducted by Hastings Conboy Braig & Associates, February 2010 (see Appendix J). Table 16 summarizes costs and revenues to both State and City and County governments. The short to mid range revenues will be generated during the period of development to full build out, while the long range revenues will be generated during the period of long-term operations. In either time frame, revenues derived from various taxes and fees are expected to exceed public costs.

Table 16
Fiscal Impacts

	Short to Mid Range (1 to 10 Years) Cumulative Amount		Long Range (Beyond 10 Years) Annual Amount	
	Revenues	Costs	Revenues	Costs
State Government	\$1,565,000	None	\$1,820,000	\$1,024,000
City and County Government	\$305,000	None	\$1,240,000	\$320,000

Finally §11-200-17(i), HAR, requires that the interrelationships and cumulative environmental impacts (both direct and indirect) of the proposed action and other related projects be discussed, including the potential secondary effects. Although the proposed development is represented to be self-contained and not related to any other project, we believe that the discussion in section 6.4, *Secondary and Cumulative Impacts*, in the DEIS (p. 6-3) is inadequate as it does not examine the potential impacts of the proposed development in conjunction with existing and planned uses in the area that do or will utilize the region's infrastructure and services regardless of their relationship with the proposed development.

Response: Section 7.4, Secondary and Cumulative Impacts has been expanded to include a discussion of other development projects on the Waianae Coast (see also, Table 20).

The other projects involve housing or community facilities, making the Nanakuli Community Baseyard distinctive as an employment-oriented development. Further, because these projects are either completed or already under construction, it is unlikely that the proposed action will conflict with other near-term uses for the region's infrastructure and services.

Text from FEIS (p. 7-3):

Table 20 shows other development projects on the Wai‘anae Coast, as identified through a search of environmental documents filed from 2000 to the present and available through the OEQC Online Library. The projects involve housing or community facilities, making the Nānākuli Community Baseyard distinctive as an employment-oriented development. Because these projects are either completed or already under construction, it is unlikely that the project will conflict with other planned, near-term uses for the region's infrastructure and services.

Table 20
Development Projects on the Wai‘anae Coast

Project Name	FEA/SFEA/ FEIS Date	Location	Description (from FEA/FEIS)	Status
Consuelo Subdivision	Feb 2006	3.35 acres, approx. one- quarter mile from Farrington Hwy near Wai‘anae Valley Road	Subdivision into 21 house lots and installation of utilities and road access for construction of affordable single-family homes	Phased project; preliminary phase underway
Nānākuli Community Center	Jan 2006	13.57 acres, portion of DHHL land in Nānākuli, adjacent to Nānāikapono Elem School	Nānākuli Community Center, Boys and Girls Club of Hawai‘i “clubhouse” facility, and commercial center/ <i>kupuna</i> housing	Community center completed; other project components not yet completed
Hale Wai Vista	Aug 2007	5.02 acres, adjacent to Wai‘anae Mall	215 affordable rental housing units. Four multi- family buildings (two 7- story and two 2-story buildings) and one multi- purpose building	First phase opened in Mar 2010
Wai‘anae Coast Comprehensive Health Center, Medical Building	Aug 2008	Existing health care campus at the base of Pu‘u Ma‘ili‘ili‘i	Re-design of four-story medical building (requiring height variance)	Building construction ongoing
Wai‘anae District Park, Parking Improvements	Nov 2008	0.5 acre, surrounding existing park parking lot	Addition of 31 standard stalls and 2 ADA stalls	Parking lot expansion completed

Notes:

FEA = Final Environmental Assessment
 SFEA = Supplemental Final Environmental Assessment
 FEIS = Final Environmental Impact Statement
 DHHL = Department of Hawaiian Home Lands
 ADA = Americans with Disability Act

5. In accordance with §11-200-17(k), HAR, a description of all irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented should be provided. This description should address the possibility of environmental accidents resulting from any phase of the action. While we acknowledge that the issue of hazardous wastes (including their handling, storage, treatment, transport, and disposal), their potential impact on the environment, and measures to mitigate such impact are addressed in section 4.15.4, *Solid Waste Disposal Facilities*, we request that such discussion also be included in section 6.5, *Irreversible and Irretrievable Commitments of Resources*.

Response: Discussion of hazardous wastes has been added to Section 7.5, Irreversible and Irretrievable Commitments of Resources.

Text from the FEIS (p. 7-5):

To reduce the waste stream, Tropic Land will develop a recycling plan for the construction and operational phases of the project. As appropriate, the plan will include a collection system for plastics, glass, paper and cardboard, cans, recyclable construction material, and green waste. Source separated material will be diverted to recovery facilities. Where possible and appropriate, the project will specify or use products with recycled content. In other cases, products produced locally will be used where possible and appropriate, including soil amendment and hydro-mulch. Individual unit owners will be encouraged to develop and implement their own recycling plans.

All unit owners will be required to comply with State and federal regulations for the handling, storage, treatment, transport, and disposal of hazardous wastes. The State Department of Health oversees the reporting of inadvertent releases or spills.

6. In accordance with §11-200-17(n), HAR, a separate and distinct section that summarizes unresolved issues, including a discussion of how such issues will be resolved prior to commencement of the action or of the overriding reasons to proceed without resolution of the issue, should be provided. We note that the U.S. Navy's authorization to extend access to Petitioner and its buyers to use the Lualualei Naval Access Road remains an outstanding issue to the extent that the form of the definitive access agreement has not been agreed upon. A timeframe of when such agreement is anticipated to be reached in relation to the development schedule of the proposed action should be provided. We suggest that the July 6, 2009 letter from the U.S. Navy Region Hawaii Commander to Petitioner transmitting a written offer for an annual license agreement, with the possibility of automatic extensions to use the access road, be provided in the interest of full disclosure.

Response: Correspondence related to use of Lualualei Naval Access Road between the Navy and Tropic Land is included in Appendix K.

7. In accordance with §11-200-17(p), HAR, the DEIS should include a separate and distinct section that contains reproductions of all substantive comments and responses made during the EISPN consultation process. Review of the DEIS indicates that while Chapter 8 includes comments on the EISPN, the individual responses to each comment are not included. Please ensure that the Final EIS includes these responses.

Response: Chapter 8 of the FEIS includes reproductions of letters commenting on the DEIS and responses. EISPN responses may be found in Appendix M.

8. In the DEIS, there are numerous references to the terms potable water and non-potable water. We request that it be replaced by the term drinking water and non-drinking water, respectively. We have been advised that although potable water has generally been used to mean drinking water, the Department of Health (DOH) uses the latter term specifically to indicate water for human consumption that is derived from surface water and/or groundwater and is regulated by the DOH pursuant to chapter 11-20, HAR.

Response: The term “potable water” has been replaced by “drinking water,” and the term “non-potable water” has been replaced by “non-drinking water.” These changes have been made throughout the FEIS.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC

LINDA LINGLE
GOVERNOR OF HAWAII

AB
DA-10-121



LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 25, 2009

MEMORANDUM

FROM:

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 -

2009 NOV 25 P 3:21
RECEIVED
OFFICE OF CONSERVATION
& COASTAL LANDS
DEPT. OF LAND & NATURAL RESOURCES
STATE OF HAWAII

TO: FROM: *ja* Morris M. Atta *Charlene*
SUBJECT: Draft Environmental Impact Statement for Nanakuli Community Baseyard
LOCATION: Island of Oahu
APPLICANT: Kimura International, Inc. on behalf of Tropic Land 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 January 3, 2010.

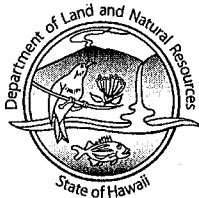
If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact my office at 587-0433. Thank you.

Attachments

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

Signed: *[Signature]*
Date: *12-3-09*

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
OFFICE OF CONSERVATION AND COASTAL LANDS
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI
FIRST DEPUTY

KEN C. KAWAHARA
DEPUTY DIRECTOR - WATER

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

REF:OCCL:AB

Correspondence: OA 10-121

MEMORANDUM

TO: Morris M. Atta, Administrator
Land Division

FROM: Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

A large, stylized handwritten signature in black ink, appearing to read "Samuel J. Lemmo".

SUBJECT: Draft Environmental Impact Statement for Nānākuli Community Baseyard
LOCATION: Nānākuli, O'ahu, TMK: (1) 8-7-009:002
APPLICANT: Kimura International, Inc., on behalf of Tropic Land LLC

The Department of Land and Natural Resources (DLNR) Office of Conservation and Coastal Lands (OCCL) has reviewed the Draft Environmental Impact Statement (DEIS) for the Nānākuli Community Baseyard project, located in Nānākuli, O'ahu, TMK: (1) 8-7-009:002.

The OCCL notes that a portion of the subject property appears to be located in the Conservation District, Limited subzone, subject to Hawai'i Administrative Rules (HAR), Chapter 13-5 Conservation District.

According to the applicant's information, the proposed industrial park will not be located in the State Conservation District portion of the property. However, on page 4-5 of the DEIS, the applicant states: "To mitigate adverse impacts from falling rocks, a 100-foot wide buffer has been set aside along the entire mauka boundary of the industrial park. This buffer has not been designed at this point, but is conceived as an unlined channel with possible fencing to catch falling rocks and debris." OCCL asks that the applicant clarify whether this buffer extends into the State Conservation District portion of the property or not. If the proposed buffer area is located in the State Conservation District, the applicant should contact OCCL to determine whether approval or permit will be required for the proposed use.

Should you have any questions, contact Audrey Barker of our office at (808) 587-0316 or audrey.t.barker@hawaii.gov.



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Samuel J. Lemmo
Administrator
Office of Conservation and Coastal Lands
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Lemmo:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by memorandum [Ref: OA 10-121]. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify the comments made.

Question: OCCL asks that the applicant clarifies whether this buffer (for rockfall mitigation) extends into the State Conservation District portion of the property or not.

Response: All proposed development, including the 100-foot wide mauka buffer strip, will occur outside the State Conservation District. No part of the project area extends into the Conservation District.

Text from the FEIS (p. 6-4):

Figure 25 shows the State land use districts of the project area and vicinity. Currently, TMK 8-7-09: 02 is partially located in the Agricultural District (168.764 acres) and partially located in the Conservation District (67.439 acres). The Conservation District land, consisting of a steep ridge of Pu‘u Heleakala, is not affected by the proposed action. The proposed industrial park site is wholly located within the Agricultural District. Tropic Land will petition the State Land Use Commission to reclassify approximately 96 acres from Agricultural to Urban (Table 19).

Table 19
Current and Proposed State Land Use Classifications
TMK: 8-7-09: 02

Land Use Districts	Current Acres	Proposed Acres
Agricultural	168.764	72.764
Conservation	67.439	67.439
Urban	0	96.000
Total	236.154	236.154

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
KAPOLEI, HAWAII 96707

LAURA H. THIELEN
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CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

December 3, 2009

Dan Davidson, Executive Officer
Land Use Commission
235 S Beretania Street, Room 406
Honolulu, Hawai'i 96813

LOG NO: 2009.4589
DOC NO: 0912NM07
Archaeology

Dear Mr. Davidson:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
Nanakuli Community Baseyard
Lualualei Ahupua'a, Wai'anae District, Island of O'ahu
TMK: (1) 8-7-009:002**

Thank you for the opportunity to review the aforementioned project, which we received on November 23, 2009. We apologize for the long delay in response. The proposed undertaking involves a 96-acre potential industrial park.

Cultural Surveys Hawaii surveyed a 170-acre project area surveyed (Hammatt *et al.* 1993. *An Archaeological Inventory Survey of a 170-acre Parcel in the Ahupua'a of Lualualei, Wai'anae District, Island of O'ahu.* [TMK: 8-7-9: portion 2; 8-7-10; 8-7-19: portion 1] SHPD Rpt No. O-792). The Hammatt *et al.* (1993) was accepted by this office in a letter (LOG NO: 10208, DOC NO: 9311EJ32) dated December 1, 1993.

There are four archaeological sites within the 96 acre project area. These are: site -4370, remnants of a historic ranching house lot, site -4367, a historic wall segment, site -4373., an incinerator belonging to the ranching and military period and site -4372, a foundation belonging to the ranching era. As stated in a letter (LOG NO: 9258, DOC NO: 9308ej17) dated September 7, 1993, we believe these sites have been adequately documented in the Hammatt *et al.* (1993) inventory survey. However, one archaeological site, SIHP NO. 50-80-08-4366 identified during the Hammatt *et al.* (1993) study was recommended for preservation. Site -4366 does not lie within the current APE, and thus, we believe it will not be impacted by the proposed undertaking.

Therefore, we believe the current undertaking will have "no effect" on historically-significant resources. However, should the APE or the scope of work for the proposed undertaking change, or if other portions of the subject parcel are to be developed, proactive archaeological mitigation (*e.g.* preservation plan for site -4366) will be required.

Mr. Dan Davidson

Page 2

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon".

Nancy McMahon, Deputy SHPO/State Archaeologist and
Historic Preservation Manager
State Historic Preservation Division

Cc; Abbey Meyer, Office of State Planning Room 600

Glenn Kimura, Kimura International Inc 1600 Kapiolani Blvd, room 600 Honolulu, HI 96813



KIMURA INTERNATIONAL INC.

April 26, 2010

Dr. Pua Aiu, Administrator
State Historic Preservation Division
601 Kamokila Boulevard, Room 555
Kapolei, HI 96707

Dear Dr. Aiu:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated December 3, 2009.

As planning consultant to the project owner, Tropic Land LLC, we acknowledge your finding that the proposed light industrial park—the current undertaking—will have “no effect” on historically significant resources.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission



UNIVERSITY
of HAWAII
MĀNOA

January 8, 2010
RE: 0796

Mr. Arick Yanagihara
Tropic Land LLC
1001 Bishop Street, Suite 2690
Honolulu, HI 96813

Dear Mr. Yanagihara:

Draft Environmental Impact Statement
Nanakuli Community Baseyard
Lualualei, Oahu

Tropic Land LLC proposes to develop an industrial baseyard on 96 acres of land off of Lualualei Naval Access Road near Nanakuli. The proposed industrial baseyard will be comprised of approximately 41 lots averaging two acres each. The proposed plan also calls for 30-foot wide buffers along Lualualei Naval Access Road, 2.4 acres of green space surrounding Ulehawa Stream, 15-foot setbacks along the northern and southern borders of the project site, and a rockfall and drainage buffer of 100 feet along the mauka edge of the project site. The applicant is seeking a change in zoning for the 96 acres – from P-2 Preservation to I-1 Industrial. The industrial baseyard will be developed under a condominium form of ownership with individual lots and common ownership of internal roads and infrastructure.

This review was conducted with the assistance of Mark Merlin, Botany Department; and Ryan Riddle, Environmental Center.

General Comments

We laud the preparer of the draft environmental impact statement (DEIS) for the number and clarity of the maps included in the document. We found them easy to read and good visual adjuncts to the text. We did, however, find the text to be very repetitive. The readability of this DEIS could be improved if some of the repetition could be eliminated. An example of the repetition occurs on page 4-21. The paragraph after the section heading, "4.8 Archaeological" is identical to the very next paragraph under the section heading "Existing Conditions". Another example is on page 2-2. The paragraph beginning with "Among the notable aspects...." contains much of the same information that is listed in the third paragraph on the previous page. The first paragraph under the section heading "Employment and Income" on page 4-41 contains the same information stated on page 2-1 and 2-2.

January 8, 2010

Page 2

In addition to our general comments we also have several specific comments.

Agriculture (p. Summary-2)

In this section the DEIS mentions that the project lands have not been cultivated since the 1980s. Later in the document however, the DEIS mentions, in section 4.14 (p. 4-43) that the cessation of sugar cane production occurred in the early 1900s then states that "Since then, the property has remained largely vacant and unused." What agricultural uses took place at or in the immediate vicinity of the project site between 1900 and 1980?

Steps in the Environmental Review and Implementation Process (p. 1-7)

In paragraph two of Section 1.5 "DES" should be *DEIS*.

Industrial Market Analysis (pp. 2-1 - 2-2)

In the second to the last paragraph on page 2-2 the DEIS discusses Oahu's industrial marketplace. In the next to the last sentence of that paragraph the DEIS says, "Typically, normal equilibrium between supply and demand is reflected by an overall vacancy rate of, say 5%." Is the 5% figure an estimate or is it in fact considered an industry guideline? The use of the word "say" would seem to indicate that this is just an estimate of the normal equilibrium figure, making the comparison with the 3% figure for Oahu, mentioned in the next sentence less precise.

Industrial Land Use Demand Forecasts (pp. 2-6 - 2-7)

At the bottom of page 2-6 and the top of page 2-7 the DEIS discusses three forecasts for industrial land use demand within the Waianae planning area and the ability of the region to absorb the introduction of 70 acres of additional industrial land. It would be helpful if the DEIS discussed other possible industrial projects in development in the region. This information would allow for a more complete evaluation of the ability of the region to absorb this type of land use.

Soil Erosion (pp. 4-5 - 4-6)

Waianae is a very dry area with pronounced wet and dry cycles, as the DEIS points out. The dry cycle corresponds to the summer months, while the wet weather occurs during the winter. Could one of the Best Management Practices (BMPs) listed on pages 4-5 and 4-6 be to schedule most of the grading in the dry summer months? Grading during dry times will greatly reduce the chance of large scale sedimentation occurring after a rain storm.

January 8, 2010

Page 3

Vegetation Resources (p. 4-15 – 4-16)

It is customary to include the scientific name for a species in addition to the common name in order to reduce confusion stemming from a species holding multiple common/regional names. We would find it helpful if the authors would reproduce the table of listed plant species (Table 1 in appendix report D) here in this part of the DEIS and the table of avian species on page 4-17 (Table 2 in appendix report D). Tables are a great way to summarize results. Having them here in the text would negate the need for the reader to go to another section of the document to find the results of the flora and fauna surveys.

It is not clear from the text of the DEIS in the second to the last paragraph in this section what Unit 15 is. What endangered species habitat does Unit 15 refer to?

Also, the word "site" in the second paragraph of this section should either be "survey" or "transect."

Potential Impacts and Mitigation Measures (p. 4-18)

There is a misprint in the second paragraph of this section: "changes on changes."

Potential Impacts and Mitigation Measures (p. 4-21)

In this section the DEIS discusses agricultural lands and the availability of "more affordable options with better access to irrigation water resources than are present on the Waianae Coast". What is the extent of available agricultural land on the Waianae Coast?

Visual Simulations – Figure 18 (p. 4-38)

The overhead and street-level visual simulations should include symbology to mark geographic orientation with regard to due north.

Demographics (p. 4-42)

In this section the DEIS states "The proposed development is not expected to affect the number of residents or the demographic characteristics of people who live in the area." While the possible demographic change may not be significant, there is the possibility that companies may relocate from other parts of the island to the Nanakuli facility bringing with them workers already employed who could move to the Waianae coast.

Long-term Employment (p. 4-42)

What types of companies are likely to locate at the industrial park? Will they be new companies or existing companies relocating from other parts of the island to Nanakuli for some competitive or fiscal reason? What are the different impacts on long-term employment and demographics if the tenants are

January 8, 2010

Page 4

mostly transplanted companies from other parts of Oahu as opposed to new companies starting in the proposed baseyard?

Surrounding Land Uses (p. 4-43)

This section should mention the number and placement of residential dwellings in the immediate vicinity of the project area. While there may not be many residential structures nearby, it would help in evaluating such things as noise and visual impacts.

Community Values (p. 5-19)

In several sections of the DEIS, most notably here and on page 4-42, the documents state that the project will be an employment center offering well paid jobs. What types of jobs do the project's proposers foresee being created by the proposed project?

EIS Preparers (Section 9-1)

We could not find section 9-1, "EIS Preparers," in the copy of the DEIS that we were given. Perhaps we missed it in our review. If this is our mistake then we apologize for bringing it to your attention. If this section is missing, please place it in the final EIS.

Thank you for the opportunity to review and comment on this DEIS.

Sincerely,



Peter Rappa

Environmental Review Coordinator

cc: OEQC
Dan Davidson, LUC
Glenn Kimura, Kimura International
Chittaranjan Ray, WRRC
Mark Merlin
Ryan Riddle



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Peter Rappa
Environmental Review Coordinator
University of Hawaii at Manoa
2500 Dole Street, Krauss Annex 19
Honolulu, HI 96822

Dear Mr. Rappa:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 8, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify the substantive comments.

Agriculture

What agricultural uses took place at or in the immediate vicinity of the project site between 1900 and 1980?

Response: Interviews were conducted with three people who have first-hand knowledge of and/or experience with farming activities on the project site. Their statements have been appended to the FEIS (Appendix L). The historical information dates back approximately 60 years, during which the site accommodated two small truck farms. The Araki farm lasted for approximately 25 years on 17 acres, followed by the brief tenure of the Higa farm which ceased operations in 1988. The truck farms experimented with corn, watermelon, round onions, bell peppers, cucumber, tomatoes, and green onions. The Arakis tried a variety of intensive farming methods and diversified by herding goats and keeping beehives. No crop was successful due to adverse growing conditions. Although the Arakis operated successful farms in Makaha—both before and after their Lualualei experience—farming on the project site was unprofitable.

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Honolulu, HI 96814
Tel: 808 944-8848 • Fax: 808 941-8999

Text from the FEIS (p. 4-4):

Farm Lots. Agricultural land use, either as a single operation or multiple farm lots was suggested initially by members of the Waianae Neighborhood Board and mentioned in some of the DEIS comments. Long-term use for agricultural purposes was dismissed as an alternative based on the agricultural consultant's report and information obtained from individuals who previously farmed the project site. Following publication of the DEIS, Tropic Land further investigated the history of farming on the project site. Interviews were conducted with three men who have first-hand experience in farming the property. Appendix L contains oral histories provided by:

- Tadashi Araki, who, with his brother, farmed the site for approximately 25 years, ending in the early 1980s
- Sonny Bradley, who helped to install the irrigation system on the Araki farm, and whose relatives worked for the Arakis
- Albert Silva, whose *ohana* previously owned the property, who has been on the property since childhood, who raised cattle on a portion of the property, and who was employed at the Naval reservation, now known as JBPHH Lualualei Annex

A common theme of the interviews was the inability of the stony, adobe soil to support productive farm activity. Mr. Araki's account details the intensive practices used to achieve a viable farm, including soil conditioning and amendments, pest control, experiments with different types of crops and auxiliary agricultural products, and advice from technical experts.

The poor outcomes obtained by the Araki brothers are consistent with Tropic Land's own experience with on-site horticultural production. Since 2007, Tropic Land has cultivated a variety of palm trees in an attempt to landscape the setback areas. Despite soil amendments, fertilization, and irrigation, tree growth is stunted. There is no evidence that farming would be a sustainable enterprise given the particular conditions of this site. Therefore, agriculture is not considered a viable alternative.

Industrial Market Analysis

In the second to the last paragraph on page 2-2, the DEIS discusses Oahu's industrial marketplace. In the next to the last sentence of that paragraph, the DEIS says, "Typically, normal equilibrium between supply and demand is reflected by an overall vacancy rate of, say, 5%." Is the 5% figure an estimate or is it in fact considered an industry guideline? The use of the word "say" would seem to indicate that this is just an estimate of the normal equilibrium figure, making the comparison with the 3% figure for Oahu, mentioned in the next sentence less precise.

Response: A 5% vacancy factor is considered a general "rule of thumb" or "industry guideline." Because it is a guideline (as opposed to a proven fact), the term "say" has been inserted so as not to mislead the reader as to the absolute certainty of the number. At an overall vacancy rate of 5%, the marketplace is considered to provide sufficient opportunity for supply and demand to interact normally in order to satisfy near-term movements or changes in the marketplace without unduly impacting the market pricing point.

Industrial Land Use Demand Forecasts

At the bottom of page 2-6 and top of page 2-7, the DEIS discusses three forecasts of industrial land use demand within the Waianae planning area and the ability of the region to absorb the introduction of 70 acres of additional industrial land. It would be helpful if the DEIS discussed other possible industrial projects in development in the region.

Response: A more direct indication of the region's ability to absorb industrial land is provided by the 21 businesses that have expressed interest in acquiring one or more units in Nānākuli Community Baseyard. Because Tropic Land intends to offer units in the industrial park for sale on a condominium basis, Tropic Land cannot offer units for sale until the Real Estate Commission has issued a Condominium Public Report for the project. Nevertheless, these businesses have already expressed serious interest in the project and provided contact information should the project proceed.

Text from the FEIS (p. 2-7):

Interest from the Business Community

Twenty-one businesses have expressed interest in acquiring or leasing one or more units in the proposed light industrial park. Tropic Land LLC cannot presently offer condominium units for sale, but these businesses have tendered serious interest in the project and provided contact information to receive a condominium public report. Types of businesses expressing interest include trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). Twelve of the 21 businesses are involved with trucking services, which is consistent with a "baseyard"-type development that offers industrial space for less intensive activities.

Soil Erosion

Waianae is a very dry area with pronounced wet and dry cycles, as the DEIS points out. The dry cycle corresponds to the summer months, while the wet weather occurs during the winter. Could one of the Best Management Practices (BMPs) listed on pages 4-5 and 4-6 be to schedule most of the grading in the dry summer months?

Response: Given the possibility of dry conditions throughout the year, one of the BMPs is to provide for water sprinkling in the construction zone, as needed.

Text from the FEIS (p. 5-5):

Mitigation measures will be implemented to reduce short-term soil erosion. These measures include limiting grading to not more than 15 consecutive acres at a time and installing a sedimentation basin at least 12,000 square feet in size at the grading site.

Additional Best Management Practices (BMPs) will be taken to lessen construction impacts further, as listed below.

- Minimize time of construction to the extent possible.
- Retain existing ground cover until the latest date before construction.
- Sod or landscape all cut and fill slopes immediately after grading work has been completed.
- Early construction of drainage control features (i.e., detention/retention basins).
- Use of temporary area sprinklers and spraying in non-active construction areas when ground cover is removed.
- Station water truck on site during construction period to provide for immediate sprinkling, as needed, in active construction zones (weekends and holidays included).
- Use temporary berms and cutoff ditches, where needed, for erosion control.
- Thorough watering of graded areas after construction activity has ceased for the day and on weekends.
- Provide sedimentation basins.
- Use slope stabilization materials where needed.

A Grading and Erosion Control Plan will be prepared in compliance with Chapter ~~23~~ 14, Revised Ordinances of Honolulu. Further, the National Pollutant Discharge Elimination System (NPDES) general permit will be obtained from the Department of Health, Clean Water Branch for: construction activities. The NPDES permit will include site-specific BMPs.

Vegetation Resources

It is customary to include the scientific name for a species in addition to the common name in order to reduce confusion stemming from a species holding multiple common/regional names. We would find it helpful if the authors would reproduce the table of listed plant species (Table 1 in appendix report D) here in this part of the DEIS and the table of avian species on pages 4-17 (Table 2 in appendix report D).

Response: Tables 1 (plant species list) and 2 (avian species list) from the biological surveys (Appendix D) have been incorporated into the EIS report.

Text from the FEIS (p. 5-19 and 5-27): Given the size of the tables, they are reproduced in this letter, but may be found on the pages indicated.

It is not clear from the text of the DEIS in the second to the last paragraph in this section what Unit 15 is. What endangered species habitat does Unit 15 refer to?

Response: Unit 15 refers to the U.S. Fish and Wildlife Service's designation of critical habitat for endangered and threatened plant species, as reported in the *Federal Register*, Vol. 68, No. 116, June 17, 2003.

Text from the FEIS (p. 5-18):

No part of the project site is included in a federally designated plant critical habitat. However, a critical habitat, identified by the U.S. Fish and Wildlife Service as Unit 15, encompasses the adjacent Pu'u Heleakala and the ridgeline above the project area extending to the northeast (Federal Register 2003).

Citation: *Federal Register*. 2003. Part II. Department of the Interior, Fish and Wildlife Service. 50 CFR Part 17. Endangered and Threatened Wildlife and Plants; Final Designations or Nondesignations of Critical Habitat for 101 Plant Species from the Island of Oahu, HI; Final Rule 68 (116; Tuesday, June 17, 2003): 35950-36406.

The word "site" in the second paragraph in this section should either be "survey" or "transect."

Response: The word "site" has been replaced with "survey."

Text from FEIS (p. 5-17):

The AECOS botanical survey was undertaken on June 25, 2008, following a wandering transect that traversed all parts of the project site up to about the 200-foot elevation. The site survey was conducted early in the dry season and, therefore, a few plants typical of the site, especially annuals, might have completed their lifecycle and been missed or gone dormant.

Potential Impacts and Mitigation Measures

In this section the DEIS discusses agricultural lands and the availability of "more affordable options with better access to irrigation water resources than are present on the Waianae Coast." What is the extent of available agricultural land on the Waianae Coast?

Response: Statistical data on available agricultural land at the sub-county level are not readily available. However, a new map has been added to the FEIS showing the amount and distribution of lands in the State Agricultural District.

Text from FEIS (p. 5-29):

Statistics for the amount of agricultural land at the sub-county level are unavailable. However, the extent of lands in the State Agricultural District along the Wai‘anae Coast is shown in Figure 17. Of course, all lands are not currently undeveloped and available for agriculture. With the availability of more favorable options, including several thousand acres of Campbell land in Kunia, Dole land in Wahiawā and Waialua, and Galbraith Estate land in Wahiawā, there are more affordable options with better access to irrigation water resources than are present on the Wai‘anae Coast.

Demographics

In this section the DEIS states “The proposed development is not expected to affect the number of residents or the demographic characteristics of people who live in the area.” While the possible demographic change may not be significant, there is the possibility that companies may relocate from other parts of the island to the Nanakuli facility bringing with them workers already employed who could move to the Waianae coast.

Response: When companies move into the new industrial park, there is a possibility that workers who do not currently live in the region will relocate to live closer to their workplace. However, the influx of new residents is not expected to be significant or cause adverse impacts on the local housing market.

Text from the FEIS (p. 5-56):

Demographics. ~~The proposed development is not expected to affect the number of residents or the demographic characteristics of people who live in the area.~~ When companies move into the new industrial park, there is a possibility that workers who do not live in the region currently will relocate to reside closer to their workplace. However, the influx of new residents is not expected to be significant nor expected to create adverse impacts on the local housing market.

Long-term Employment

What types of companies are likely to locate at the industrial park? Will they be new companies or existing companies relocating from other parts of the island to Nanakuli for some competitive or fiscal reason? What are the different impacts on long-term employment and demographics if the tenants are mostly transplanted companies from other parts of Oahu as opposed to new companies starting in the proposed baseyard?

Response: Among the 21 businesses that have expressed interest in the proposed industrial park are companies involved in trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). All businesses within the industrial park would need to conform to land use restrictions imposed by the proposed I-1, Limited Industrial District zoning classification.

Tropic Land expects that a mix of relocated and new businesses will locate in the light industrial park. Fifteen of the 21 businesses reported current addresses in Waianae. Six businesses are currently located in Honolulu, Aiea, Pearl City, Ewa Beach, and Kapolei. In addition to these businesses, the Waianae Coast Coalition, a non-profit organization, is supporting the business incubator component of the project for the purpose of encouraging start-up enterprises.

Text from the FEIS (p. 2-7):

Interest from the Business Community

Twenty-one businesses have expressed interest in acquiring or leasing one or more units in the proposed light industrial park. Tropic Land LLC cannot presently offer condominium units for sale, but these businesses have tendered serious interest in the project and provided contact information to receive a condominium public report. Types of businesses expressing interest include trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). Twelve of the 21 businesses are involved with trucking services, which is consistent with a “baseyard”-type development that offers industrial space for less intensive activities.

Fifteen of the 21 businesses reported current addresses in Wa‘ianae. The remaining six businesses are currently located in Honolulu, ‘Aiea, Pearl City, ‘Ewa Beach, and Kapolei.

The business incubator is proposed to afford a home for start up businesses. The Wai‘anae Coast Coalition, a non-profit organization, is leading the planning effort for the business incubator component of the project.

Surrounding Land Uses

This section should mention the number and placement of residential dwellings in the immediate vicinity of the project area. While there may not be many residential structures nearby, it would help in evaluating such things as noise and visual impacts.

Response: A new map has been added to the FEIS (Table 20) which shows land uses within 300 feet of the project area boundary. One private residence and several military structures are located within the 300-foot area.

Text from the FEIS (p. 5-47):

With the exception of a single residence, located on Lualualei Naval Access Road opposite the southern tip of the project site, there are no known land uses generally defined as noise sensitive. Figure 20 shows land uses within a 300-foot radius of the project site. The 300-foot distance demarcates the area typically required for notification of major land-use actions because of potential impacts. The map also shows several structures within the JBPHH Lualualei Annex that are within 300 feet of the project boundary. Although specific uses are unknown, these buildings are likely to be air-conditioned and, therefore, more insulated from external environmental conditions.

Community Values

In several sections of the DEIS, most notably here [p. 5-19] and on page 4-42, the document states that the project will be an employment center offering well paid jobs. What types of jobs do the project's proposers foresee being created by the proposed project?

Response: The types of jobs foreseen are related to the types of businesses that have already expressed interest in locating at the proposed industrial park. The following table lists representative occupational titles with corresponding median hourly wages, based on statistics for the Honolulu Metropolitan Statistical Area (MSA) compiled by the State of Hawaii, Department of Labor and Industrial Relations (*Occupational Employment and Wages in Hawaii, 2008*).

Occupational Title	Hourly Median (\$)
Stonemasons	27.19
Cement masons and concrete finishers	27.75
Construction laborers	23.38
Paving, surfacing, tamping equipment operators	34.78
Electricians	28.79
Painters, construction and maintenance	24.40
Landscaping, grounds maintenance workers	13.05
Truck drivers, heavy and tractor-trailer	18.38
Industrial truck and tractor operators	16.32
Material moving workers, all others	22.04
Total, all occupations	16.38

Text from FEIS: None. Information in response provided for clarification.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.



Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

**West County
Oahu Farm Bureau**

87-1550 Kanahole Road Waianae, Hawaii 96792

RECEIVED JAN 08 2010

January 7, 2010

Mr. Dan Davidson, Executive Officer
Land Use Commission
235 . Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Davidson:

Re: Nanakuli Community Baseyard; Docket No. A09-782; TMK: (1)8-7-09:02 (por.)

West County of Oahu Farm Bureau has reviewed the Draft EIS and submits the following comments:

LAND USE POILICIES AND CONTROLS

We oppose Tropic Land LLC (applicant)'s request to seek an I-1 land use district amendment. We believe that the location and proximity of the project contributes to urbanization and undesirable encroachment pressures on important agricultural production of fresh leafy vegetables, herbs, pork and eggs in our valley. We believe this is a typical case of "spot zoning" where an interested party purchases vacant agricultural land solely for the purpose of development and not for farming. This request will definitely endanger the farming character of our community by further intrusion of industrial activity in addition to the conditional land uses of Pacific Aggregate and the PVT Landfill. Our farms will be surrounded from the Northeast, South and West.

The applicant has emphasized the soil quality of the property as a reason for the land to be undesirable for farming. We believe their intent to develop and not farm demonstrates their lack of interest to invest in irrigation and soil remediation. Many of our members own land with similar soil characteristics, yet our members have farmed this land since the 1940s and converted this community into a productive agricultural area.

One of the main threats to the viability of diversified agriculture is urban encroachment by incompatible land uses. We believe this application is contrary to the State Constitution to conserve and protect agricultural land. We believe that two values of the Waianae Sustainable Communities Plan: rural character and small town values are higher priorities than the applicant's emphasis on economic choices. Page 103 of the DEIS states the project has sufficient reserve areas for foreseeable urban growth and proposes "city like" concentration of people, structure, and services.

TRAFFIC

The Waianae Community has suffered transportation bottlenecks due to the "one way in, one way out" access of Farrington Highway. During natural disasters such as hurricanes and wind storms that close our highway from down electrical poles; traffic fatalities; or road construction, commuting is chaotic. Transporting our perishable products and livestock takes 30-45 minute more during these commuting catastrophies. Until Waianae receives a second highway, increasing traffic especially at the intersection of Lualualei Naval Road and Farrington Highway should be avoided. The DEIS states that traffic will increase at that intersection and the baseyard will accommodate heavy trucks and trailers.

We strongly oppose this request because this is no definite agreement with the Navy and the applicant to access Lualualei Naval Road. Hakimo Road is the primary access for the project and we strongly oppose any increase in industrial heavy trucks and trailers on Hakimo and Paakea Roads. Hakimo Road is a paved country road that is narrow with many bends and poor drainage. Many farmers use

January 7, 2010

these roads for transporting tractors and farm equipment between various farm lots. There are no sidewalks for children to wait for the school buses. Introducing industrial traffic levels will endanger children and farming residents.

FOOD SAFETY AND QUALITY

Our federal government and Hawaii Farm Bureau Federation have made food safety a priority. Our farmers are subject to food safety audits and inspections to do business with major wholesalers and retailers. The presence of this industrial park will impact the quality of the fresh produce we grown and the farmer's risk assessment for food safety audits.

Air Quality. The applicant's DEIS states: on page 75, its construction will emit fugitive dust and exhaust to adjacent areas. These pollutants can cause yellowing of vegetable and result in lower production and rejection of produce.

Solid Waste. The applicant's DEIS states certain industrial uses may have potential to generate hazardous or regulated waste. The quantities are not estimated because the precise nature of future occupants is unknown. The uncertainty of the solid waste from the baseyard is a serious concern to food safety.

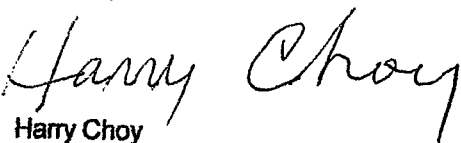
Waste Water Effluent. The applicant proposes to use the effluent from its waste water system for irrigation. We are concern of the contamination of vegetable fields during the rainy season from effluent runoff. Who will be guarantee that requirements to use waste water effluent for irrigation are fulfilled and the practice safe?

PURPOSE AND NEED FOR THE PROPOSED ACTION

The applicant raises the need to create employment in the Waianae Coast. Previous zone change applications have also stress the fulfillment of job creation by taking agricultural land for urban and industrial use. The emotion of job creation is high for the Waianae Community. Will this project attain that purpose without creating harm to agriculture, transportation and safety? The DEIS states the Waianae community is less likely to hold jobs in management position. Will the baseyard project attract the new entrepreneurs and others to create jobs, relocate to Waianae despite the traffic problems?

We respectfully ask the constitutional protection of agricultural land be applied to our community. Many of us were evicted from leased land by Estate land owners and relocated to Waianae 60 years ago. The suggestion that going back to lease agricultural land in the Ewa plains is naive. Former plantation lands have superior soil quality but lack the infrastructure of roads, water and electricity. Many leases are month to month or one year and restrict the farmer's ability for financing. The availability of ditch water is a serious issue. Waianae's farm lots have better infrastructure and desirable lot size for new immigrant farmers. Please oppose the land use district boundary amendment for Nanakuli Community Baseyard.

Sincerely,



Harry Choy
Director

Cc: Mr. Abbey Seth Mayer
Cc: Mr. Glenn Kimura



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Harry Choy, Director
West County Oahu Farm Bureau
87-1550 Kanahale Road
Waianae, HI 96792

Dear Mr. Choy:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated January 7, 2010.

We note your concerns related to land use policies, traffic, food safety and quality, and the purpose of and need for the project. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to your questions

Who will guarantee that requirements to use waste water effluent for irrigation are fulfilled and the practice safe?

Response: New on-site wastewater system plans must be approved by the State of Hawaii, Department of Health (DOH), Wastewater Branch. Permits are tied to the City and County's building permit process. Permits for new construction require the DOH to review and sign permit applications.

The DOH also regulates the use of recycled water (*Guidelines for the Treatment and Use of Recycled Water*, Hawaii State Department of Health, Wastewater Branch, May 15, 2002). Requirements include DOH approval of an irrigation plan, engineering design report for the water reuse project, construction plans for the water reuse project, and employee training plan.

Text from the FEIS (p. 5-63 and 5-65):

The proposed on-site wastewater collection system is illustrated in Figure 5 (Chapter 3). Gravity sewers will be located within sewer easements. Preliminary pipe line sizes range from 8 to 10 inches in diameter. Design and construction of the system will be in accordance with standards established by the City and County and State Department of Health.

A water reuse plan will be developed for effluent water from the wastewater treatment plant. The plan will include additional information about irrigation practices, management, public education, and other required information per the DOH Recycled Water Guidelines.

The emotion of job creation is high for the Waianae Community. Will this project attain that purpose without creating harm to agriculture, transportation and safety? The DEIS states the Waianae community is less likely to hold jobs in management position. Will the baseyard project attract the new entrepreneurs and others to create jobs, relocate to Waianae despite the traffic problems?

Response: Twenty-one businesses have expressed interest in acquiring one or more units in the proposed light industrial park. Because Tropic Land intends to offer units in the industrial park for sale on a condominium basis, Tropic Land cannot offer units for sale until the Real Estate commission has issued a Condominium Public Report for the project. Nevertheless, these businesses have expressed serious interest in the project and provided contact information to receive a public report. Fifteen of the 21 businesses reported current addresses in Waianae. Six businesses are currently located in other regions, such as Honolulu, Aiea, Pearl City, Ewa Beach, and Kapolei.

In addition to these businesses, the Waianae Coast Coalition, a non-profit organization, is supporting business incubator component of the project that would encourage start-up companies.

Text from the FEIS (p. 2-7):

Interest from the Business Community

Twenty-one businesses have expressed interest in acquiring or leasing one or more units in the proposed light industrial park. Tropic Land LLC cannot presently offer condominium units for sale, but these businesses have tendered serious interest in the project and provided contact information to receive a condominium public report. Types of businesses expressing interest include trucking and hauling, equipment handling,

general contracting, and trades (painting, welding, electrical, masonry, landscaping).
Twelve of the 21 businesses are involved with trucking services, which is consistent with a "baseyard"-type development that offers industrial space for less intensive activities.

Fifteen of the 21 businesses reported current addresses in Wa'iana'e. The remaining six businesses are currently located in Honolulu, 'Aiea, Pearl City, 'Ewa Beach, and Kapolei.

The business incubator is proposed to afford a home for start up businesses. The Wai'anae Coast Coalition, a non-profit organization, is leading the planning effort for the business incubator component of the project.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

BOARD OF WATER SUPPLY

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



December 14, 2009

MUFI HANNEMANN, Mayor

RANDALL Y. S. CHUNG, Chairman
SAMUEL T. HATA
ALLY J. PARK
ROBERT K. CUNDIFF
WILLIAM K. MAHOE

JEFFREY S. CUDIAMAT, Ex-Officio
BRENNON T. MORIOKA, Ex-Officio

WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager and Chief Engineer

RECEIVED DEC 18 2009

Mr. Dan Davidson, Executive Officer
Department of Business Economic Development & Tourism
State of Hawaii
Land Use Commission
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Davidson:

Subject: Letter Dated November 20, 2009 on the Draft Environmental Impact
Statement (DEIS) for the Nanakuli Community Baseyard, Lualualei,
Waianae, TMK 8-7-009:002

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

The existing water system cannot provide adequate fire protection to the proposed industrial development. Our Water System Standards require an offsite fire hydrant to be located within 125 linear feet of industrial developments and provide a flow of 4,000 gallons per minute (gpm). The existing water system can only provide a flow of approximately 2,200 gpm to fire hydrant L-945 at the intersection of Paakea Road and Hakimo Road. Therefore, the developer will be required to install approximately 7,000 linear feet of 16-inch water main from the 20-inch main at the intersection of Paakea and Hakimo Road to the site to upgrade the fire protection in accordance with our water system standards. The construction drawings should be submitted for our review and approval.

Please be advised that this information is based upon current data and, therefore, the Board of Water Supply reserves its right to change any position or information stated herein up until the availability of water will be confirmed when the building permit application is submitted for approval.

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

Mr. Dan Davidson
December 14, 2009
Page 2

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions please contact Robert Chun at 527-6123.

Very truly yours,



KEITH S. SHIDA
Program Administrator
Customer Care Division

cc: Mr. Glen Kimura, Kimura International, Incorporated
Mr. Abbey Seth Mayer, DBEDT-Office of Planning



KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Keith S. Shida, Program Administrator
Customer Care Division
Board of Water Supply
630 South Beretania Street
Honolulu, HI 96843

Dear Mr. Shida:

**Comments on the Draft Environmental Impact Statement
Nanakuli Community Baseyard, Oahu, Hawaii
Portion of TMK: (1) 8-7-009: 002**

Thank you for your comments on the Draft Environmental Impact Statement submitted by letter dated December 14, 2010. As planning consultant to the project owner, Tropic Land LLC, we have been asked to respond to questions and, where appropriate, summarize and clarify comments.

Comments are numbered according to the items in your letter.

1. The existing water system cannot provide adequate fire protection to the proposed industrial development. Our Water System Standards require an offsite fire hydrant to be located within 125 linear feet of industrial developments and provide a flow of 4,000 gallons per minute (gpm). The existing water system can only provide a flow of approximately 2,200 gpm to fire hydrant L-945 at the intersection of Paakea Road and Hakimo Road. Therefore, the developer will be required to install approximately 7,000 linear feet of 16-inch water main from the 20-inch main at the intersection of Paakea and Hakimo Road to the site to upgrade the fire protection in accordance with our water system standards. The construction drawings should be submitted for our review and approval.

Response: As described in the EIS, the project owner intends to construct a 16-inch water main that connects to the existing 20-inch main at the intersection of Paakea and Hakimo Roads. This facility will be designed and constructed to the Board of Water Supply's standards. Construction drawings, to be prepared during the project design phase, will be submitted for your review and approval.

The project owner is aware that availability of water is yet to be confirmed, and that confirmation will be made when the building permit application is submitted for approval. Furthermore, when water is made available, the project owner will be required to pay Water System Facility Charges for resource development, transmission, and daily storage.

On-site fire protection requirements will be coordinated with the Fire Prevention Bureau of the Fire Department.

Text from the FEIS (p. 5-62): The proposed drinking water system will be connected to the existing 20-inch BWS water main at the intersection of Pa‘akea Road and Hakimo Road. A new 16-inch transmission line will be located along Pa‘akea Road and Lualualei Naval Access Road, entering into the project site. An easement from the Navy will be needed for a portion of the water line to be constructed under Pa‘akea Road and Lualualei Naval Access Road.

By letter dated July 2, 2009, BWS indicated that installation of a new 16-inch water main will provide adequate fire flow to the proposed industrial development. Design and construction of the drinking water distribution system will be in accordance with BWS Standards. The easement and water systems will be dedicated to the BWS.

We appreciate your participation in the environmental review process.

Sincerely,
KIMURA INTERNATIONAL, INC.

A handwritten signature in black ink, appearing to read "Glenn T. Kimura", with a long horizontal flourish extending to the right.

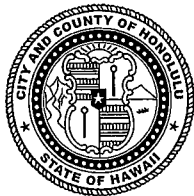
Glenn T. Kimura
President

Cc: Arick Yanagihara, Tropic Land LLC
Dan Davidson, Land Use Commission

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN
MAYOR



DAVID K. TANOUE
DIRECTOR
ROBERT M. SUMITOMO
DEPUTY DIRECTOR

2009/ELOG-2772 (mw)

January 20, 2010

RECEIVED JAN 21 2010

Mr. Orlando Davidson, Executive Officer
Land Use Commission
State of Hawaii
P. O. Box 2359
Honolulu, Hawaii 96804-2359

Dear Mr. Davidson:

Subject: Draft Environmental Impact Statement (EIS) for the Nanakuli Community
Base Yard, Lualualei, Waianae, Oahu, TMK 8-7-9: por. 2

We have the following comments on this Draft EIS for Tropic Land's proposed 96-acre industrial park next to the Lualualei Navy facility:

1. In Chapter 2, the project's market analysis needs to provide more information that there is indeed a potential demand for additional industrial land in the Waianae district. The EIS should discuss the development of the 15-acre industrial park at Village Pokai Bay in Waianae Town. Other useful information includes: (1) the growth history of other new leeward industrial parks (such as Mill Town Center in Waipahu), (2) statements by realtors that there have been inquiries about land for light industrial use in the leeward area's west end, and (3) actual relocations of industries in the direction of Waianae. In addition, Chapter 2 needs to defend two underlying assumptions behind the market analysis: (1) that the enormous proportional disparity of jobs between major employment centers and outlying bedroom communities can actually be solved by making more land available for business growth in purely residential areas, and (2) the conversion factor of "5,000 square feet of land area per employee/job", which the market analysis uses to calculate the future demand for industrial land in the Waianae district.
2. The EIS is erroneously characterizing the lands along Lualualei Naval Access Road as urban and industrial, when much of it is open space and rural. The EIS should discuss nearby land uses in terms of their location beyond the Waianae Sustainable Communities Plan's (SCP) Rural Community Boundary.
3. Chapter 4 needs to discuss all the potential impacts of the planned industrial uses themselves. Potential impacts from industrial operations include internal traffic circulation of large trucks, potential groundwater contamination, and potential noise and air quality impacts.

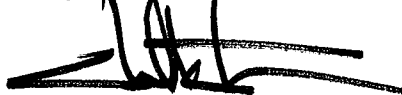
4. Consistency is needed with regard to existing wells and water use. Section 4.2 states that the existing wells will remain capped, whereas Section 3.1 states that the wastewater effluent may be diluted with non-potable water from these wells, and Section 4.15.2 states that potable water may be used for this purpose.
5. Section 4-9 needs to discuss the need for sidewalks, bike paths, and street light improvements, both along Lualualei Naval Access Road and within the project. These types of travel improvements are recommended by the Waianae SCP along major valley roads, and would be required within the project if subdivision of the land were being requested.
6. Section 4.15 needs to discuss the Underground Injection Control line as well as the No Pass Zone, and to map both.
7. In Section 5.6 on the General Plan, the Physical Development and Urban Design subsection should: (1) explain why a new employment center is appropriate to this location, and (2) remove Objective D, Policy 1, since it applies only to urban-fringe areas, and the General Plan considers the entire Waianae district to be a rural area.
8. A fuller discussion is also needed on the Waianae SCP's vision for the future of the region (Section 5.7). First, when discussing how the project relates to that vision, it is important to bring up the associated community value on the need for economic choices. Second, the discussion of the second vision element, Rural Values and Qualities, needs to: (1) explain how adding an industrial park in an outlying area fits in with this vision element, and (2) describe the project site as having easy access to the freeway, but not as being "close to the freeway". Third, all six vision elements need to be listed and briefly discussed, especially the limited availability of potable water in the Waianae district.
9. Section 5.8 misstates the project area's zoning and zoning history. First, Table 17 should indicate that an estimated 71 acres are zoned P-1 Restricted Preservation (the area within the State Conservation District). Second, the rezoning of the property for golf course use occurred in 1996, not in 1999, and changed only part of the parcel from the AG-1 and AG-2 agricultural districts to the P-2 General Preservation district.
10. A licensed geotechnical engineer needs to be retained to investigate the potential rockfall hazards and to recommend mitigation measures. Also, the developer is expected to construct all improvements recommended by the geotechnical engineer in order to ensure that the site is suitable for development.
11. On page 4-6, the City grading ordinance should be listed as Chapter 14 of the Revised Ordinances of Honolulu, not as Chapter 23.

Mr. Orlando Davidson, Executive Officer
Land Use Commission
January 20, 2010
Page 3

12. The preliminary engineering report prepared by Hida, Okamoto and Associates and included in the Final EIS must be stamped and signed by a licensed civil engineer, with the authentication statement placed below the engineer's stamp.
13. Why are soil loss calculations provided to reflect the long-term change in soil erosion potential? They may not be accurate, for two reasons: (1) the proposed and future LS values may not be the same, and (2) the existing and future C values should be based on the Universal Soil Loss Equation's Tables 20 and 22, respectively.
14. The discussion on flooding in Section 4.4 should be expanded to cover the need to set back buildings from Ulehawa Stream. It should mention that the site plan includes a landscaped setback encompassing Ulehawa Stream (see pages 3-2 and 3-4). It should also note that the drainage basin covers over 1,000 acres and that the Q100 is about 2,800 cfs.
15. With regard to the drainage catchment areas, Figure 12 (page 4-10) has two areas labeled "B-1", and the size of drainage catchment area A is correctly listed in Table 6 (page 4-8) as 1,084 acres, but incorrectly as 1.08 acres in Tables 3 and 4 of the Preliminary Engineering Report.
16. The entire report needs to be carefully proofread. Be especially careful on compass directions, figure numbers, etc. One particularly misleading statement on page 6-1 should be edited as follows: "Increased vehicular travel along Farrington Highway and Lualualei Naval Access Road will have an effect on traffic flow." Also, two paragraphs on page 4-19 on soil types and crop productivity ratings are especially hard to follow.

Should you have any questions, please contact Mike Watkins of our staff at 768-8044.

Very truly yours,



David K. Tanoue, Director
Department of Planning and Permitting

DKT:js

cc: OEQC
Kimura International, Inc.
Office of Planning

Tropic Land DEIS