KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. David K. Tanoue, Director
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Dear Mr. Tanoue:

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 20, 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. 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… 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.

> ***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. The 21 businesses engage in the following types of business activity: trucking and hauling, equipment handling, general

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

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, offering industrial space for less intensive land uses.

All uses would conform to the proposed zoning classification of I-1, Limited Industrial District. 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 the business incubator component of the project.

The Village Pokai Bay Industrial Park has not been developed. Although it was proposed a number of years ago, the site is little more than a vacant lot.

Text from 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.

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.

Response: In the existing Waianae SCP, the Rural Community Boundary runs *mauka* along Lualualei Naval Access Road to the Paakea Road intersection, then along the length of Paakea Road through Ma‘ili. The project site is located approximately 0.25 mile outside the Rural Community Boundary, from a point at the intersection of Lualualei Naval Access Road and Paakea Road. This intersection also marks the *mauka* extent of the State Urban District, with the PVT Landfill and Pineridge Farms (formerly a cement manufacturing plant and presently a recycling facility), located within lands classified as Urban.

Text from the FEIS: None. Response provided for clarification purpose.

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.

Response: Potential short-term (construction phase) and long-term (operational phase) impacts are discussed in Chapter 3, which describes the project and Chapter 5, which describes potential impacts and mitigations for each resource area. Chapter 7 identifies unavoidable short- and long-term adverse impacts, as well as secondary and cumulative impacts. The summary sheet at the front of the document provides an overview.

Text from the FEIS: Text is distributed throughout the FEIS, as indicated in the response, and, therefore, not duplicated in this letter.

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.

Response: Existing wells will remain capped. Relevant sections of the FEIS have been revised accordingly.

Text from the FEIS (p. 3-3 and 5-7):

Effluent may be supplemented with ~~non-drinking water from the existing wells~~ <u>potable or drinking water</u> for irrigation purpose

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.

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.

Response: Because Tropic Land intends to submit the project to a Condominium Property Regime, Tropic Land may not be required to obtain final subdivision approval for the project. If subdivision approval is not required, specific roadway improvements will be addressed during the design phase of the project and in consultation with the U.S. Navy and City agencies.

Text from the FEIS (p. 3-2 and 5-42):

The development is planned with a single, secured entry off Lualualei Naval Access Road and a secondary access for fire and emergency purposes. Interior roads will be privately owned and maintained. Street will be designed with a 44-foot right-of-way and two 12-foot lanes. Street corners will be designed with wide turning radii to accommodate large trucks and trailers. Curbs, gutters, and sidewalks may be installed. Street lights and street trees will be installed for safety and aesthetic purposes.

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.

6. Section 4.15 needs to discuss both the Underground Injection Control line as well as the No Pass Zone, and to map both.

Response: The Underground Injection Control area is discussed in Section 5.2 of the FEIS and illustrated in Figure 12.

Text from the FEIS (p. 5-7)

:

Figure 12 shows a map of the Underground Injection Control (UIC) area. The UIC program, in conjunction with federal and State safe drinking water laws, is intended to protect groundwater from contamination. As shown in the map, the project site is located mauka of the UIC line, in an area with restrictions on injection wells.

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.

Response: The appropriateness of Lualualei Valley for a light industrial park is described on page 6-15. Reference to Objective D, Policy 1 has been deleted.

Text from FEIS (p. 6-15):

Discussion**:** As an employment center, the proposed industrial park is appropriate for this location for the following reasons: ~~The proposed industrial park~~ It is located off the main highway, where it will not detract from either the scenic views of the coast or the ambiance of small commercial villages in nearby Nānākuli and Mā'ili. The industrial park is also favorably situated from a transportation standpoint. Lualualei Naval Access Road was designed and constructed for truck transport. Compared to other mauka-makai roadways in the district, there is a low volume of residential traffic on Lualualei Naval Access Road and the uses adjoining the road are similarly industrial in nature. In terms of the regional roadway network, the location has ease of access to the freeway and the location near the gateway to the Wai'anae district would minimize truck traffic farther up the coast.

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.

Response: The discussion of the relationship of the project to the Waianae SCP's vision and community values may be found starting on page 6-16.

Text from the FEIS (p. 6-16 and 6-19):

Discussion**:** The proposed amendment seeks to establish an employment center in the Wai'anae District. The proposal will amplify the district's sense of independence, specifically economic independence and expand local employment opportunities. For some district residents, this key element of the vision is not yet fully realized, as the Wai'anae Coast historically has experienced disproportionately high rates of unemployment and underemployment. There are ongoing efforts in the local schools and by non-profit organizations to encourage young people to strive for economic independence. At the same time, there are many on the Wai'anae Coast who have successfully created small businesses, for example, in contracting, services, and trucking. The proposed development offers a potential venue for these businesses to operate within the community.

***Discussion*:** Although the amendment area is undeveloped, it is not suitable for commercial agriculture. Previous attempts to farm the amendment area have been unsuccessful. Because of the clayey soils with poor drainage, the site is unable to sustain commercial agricultural operations, particularly in light of alternative areas available that have better growing conditions. The Wai‘anae SCP itself recognizes that the highly expansive clay soils on the lower slopes of the ridges are not good for agriculture (p. 2-10).

The proposed industrial park will not generate a need for public facilities, such as schools and parks. Truck traffic is expected to increase in the vicinity of the industrial park, but roads will be used more efficiently. The industrial park site is located close to the freeway and is likely reduce the volume of trips made further up the coast. Industrial park employees who live in the Wai‘anae District will not have to commute to more distant locations, such as Hālawa, Kalihi, or Airport/Māpunapuna.

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 the golf course 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.

Response: Acreages in the table showing “Current and Proposed Zoning” (Table 20 in the FEIS) have been revised. The rezoning date for the golf course has been changed to 1996.

Text from FEIS (Table 20, p 6-25):

Table 20
Current and Proposed Zoning
TMK: 8-7-09: 02

Zones	Current Acres	Proposed Acres
Preservation P-1	71.0	71.0
Preservation P-2	165.154 ~~236.154~~	69.154 ~~140.154~~
Industrial I-1	0	96.0
Total	236.154	236.154

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.

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 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.

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.

Response: Correction made.

Text from the FEIS (p. 5-6):

A Grading and Erosion Control Plan will be prepared in compliance with Chapter ~~23~~ 14, Revised Ordinances of Honolulu.

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.

Response: The preliminary engineering report (Appendix A) has been stamped and signed by a licensed civil engineer.

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.

Response: The soil loss calculations have been modified, as shown in Table 5.

Text from the FEIS (Table 5, p. 5-6):

Table 5
Summary of Soil Erosion Potential

Subarea	Existing Conditions (tons/year)	Developed Conditions (tons/year)	Percent Change (%)
A	403	~~264~~ 60	~~-66~~ -85
B	5,306	5,306	0
Total	5,709	~~5,570~~ 5,366	~~-2~~ -6

Source: Hida, Okamoto & Associates. January 2010. Preliminary Engineering Report

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.

Response: The discussion on flooding (Section 5.4 in the FEIS) notes that the buffer area surrounding Ulehawa Stream serves as a building setback.

Text from the FEIS (p. 5-14):

Buildings will be set back from Ulehawa Stream through the reservation of a buffer area in the northwest corner of the project site.

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.

Response: Corrections have been made to Figure 13 in the FEIS and the Preliminary Engineering Report tables.

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.

Response: Typographical errors corrected.

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 TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR

WAYNE YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

TP11/09-342653R

January 7, 2010

RECEIVED JAN 08 2010

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

Dear Mr. Kimura:

Subject: Draft Environmental Impact Statement for Nanakuli Community Baseyard Project, Nanakuli, Oahu

This responds to the Draft Environmental Impact Statement (DEIS) study for the subject project. We are offering the following comments:

- We believe that the project title should be renamed to reflect the project intent and purpose. The City commonly uses the title "baseyard" for its various facilities that provide maintenance, repair, and other related services for its vehicles. The project, as described in the "proposed action" is a condominium type "industrial park." Therefore, in order to prevent confusion on the proposed project, we strongly suggest that the project title be renamed as an "industrial park" and not a "baseyard;"

- The Traffic Impact Assessment Report should include an assessment of impacts on local roads;

- Lualualei Naval Access Road, as noted in the document, is currently controlled by the U.S. Navy. The final Environmental Impact Statement (FEIS) should include formal documentation (i.e. letter of agreement) of the agreement between the Navy and the property owner to utilize the Access Road to gain access to the property. We would be very concerned about potential traffic impacts if access to the property were to utilize Hakimo Road which currently does not meet City roadway standards;

- The document should clarify the term "fair share agreement." This term is mentioned in regards to an agreement between the State, City, and the property owner. As part of rezoning, it has been City policy to require developers to construct and/or implement any necessary transportation related mitigation measures that may be required of a project. The City, to date, has not entered into any verbal or formal agreement to participate in any "fair share agreement" for transportation related improvements in the area; and

- The DEIS should document any pre-consultation, correspondence or meetings the developer may have had with the State Department of Transportation (HDOT) since the proposed project impacts Farrington Highway. The results of any meetings or correspondence with HDOT and their concerns should have been included in Section 4.9. of the DEIS that discusses "Roadways and Traffic."

Should you have any questions, you may contact Mr. Brian Suzuki of my staff at 768-8349.

Very truly yours,

Wayne Y. Yoshioka
Director

cc: Mr. Dan Davidson
Land Use Commission

Ms. Abbey Seth Mayer
Office of Planning

Office of Environmental Quality Control

KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

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. 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. We believe that the project title should be renamed to reflect the project intent and purpose. The City commonly uses the title "baseyard" for its various facilities that provide maintenance, repair, and other related services for its vehicles. The project, as described in the "proposed action" is a condominium type "industrial park." Therefore, in order to prevent confusion on the proposed project, we strongly suggest that the project title be renamed as an "industrial park" and not a baseyard.

> ***Response***: The term "baseyard" reflects early interest in the project from businesses that would use the location as a base of operations, including companies involved in trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). Nevertheless, Tropic Land is considering a name change in the future. Any change would be made with input from the local community.
>
> ***Text from the FEIS (Preface)***: Tropic Land LLC has received several suggestions to change the name of the project, the Nānākuli Community Baseyard. Because the project's name was selected at the suggestion of and with the approval of the Nānākuli/Māʻili Neighborhood Board, and in order to avoid confusion in the review of the FEIS, Tropic Land has decided to defer any change to the name of the project until after consulting the Nānākuli/Māʻili Neighborhood Board.

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

2. The Transportation Impact Assessment Report should include an assessment of impacts on local roads.

> ***Response***: The TIAR focuses on impacts to Farrington Highway, the public roadway closest to the project site. Impacts to Lualualei Naval Access Road and appropriate mitigation measures will be determined in consultation with the Navy as part of the ongoing process of reaching a long-term easement agreement to use the road.
>
> ***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.

3. Lualualei Naval Access Road, as noted in the document, is currently controlled by the U.S. Navy. The final Environmental Impact Statement (FEIS) should include formal documentation (i.e., letter of agreement) of the agreement between the Navy and the property owner to utilize the Access Road to gain access to the property. We would be very concerned about potential traffic impacts if access to the property were to utilize Hakimo Road which currently does not meet City roadway standards.

> ***Response***: Correspondence related to Lualualei Naval Access Road between Tropic Land and the Navy is included in Appendix K of the FEIS. As noted in the correspondence the Navy had agreed to leasing a long term easement to use Lualualei Naval Access Road to the adjoining property owners who are presently the primary non-Navy users of the road. Tropic Land and the Navy are presently discussing the terms of the easement.
>
> ***Text from the FEIS (p. 5-38)***: Correspondence with the Navy regarding Lualualei Naval Access Road may be found in Appendix K.

4. The document should clarify the term "fair share agreement." This term is mentioned in regards to an agreement between the State, City, and the property owner. As part of rezoning, it has been City policy to require developers to construct and/or implement any necessary transportation related mitigation measures that may be required of a project. The City, to date, has not entered into any verbal or formal agreement to participate in any "fair share agreement" for transportation related improvements in the area.

> ***Response***: Detailed plans for roadway improvements and how they will be implemented will be determined in consultation with the Navy and other stakeholders. Tropic Land is committed to implementing 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.

5. The DEIS should document any pre-consultation, correspondence or meetings the developer may have had with the State Department of Transportation (HDOT) since the proposed project impacts Farrington Highway. The results of any meetings or correspondence with HDOT and their concerns should have been included in Section 4.9 of the DEIS that discusses "Roadways and Traffic."

Response: Letters from HDOT were received during the EISPN and DEIS comment periods. These letters are included in Chapter 9 and Appendix M of 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
Dan Davidson, Land Use Commission

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

MUFI HANNEMANN
MAYOR

KENNETH G. SILVA
FIRE CHIEF

ALVIN K. TOMITA
DEPUTY FIRE CHIEF

December 15, 2009

RECEIVED DEC 19 2009

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

Dear Mr. Kimura:

Subject: Draft Environmental Impact Statement
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu
Tax Map Key: 8-7-009: 002 (Portion)

In response to your letter of November 20, 2009, regarding the above-mentioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

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

2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

   On-site fire hydrants and mains capable of supplying the required fire flow shall be provided when any portion of the facility or building is in excess of 150 feet (45 720 mm) from a water supply on a fire

apparatus access road, as measured by an approved route around the exterior of the facility or building. (1997 Uniform Fire Code, Section 903.2, as amended.)

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

Should you have any questions, please call Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151.

Sincerely,

KENNETH G. SILVA
Fire Chief

KGS/KN:bh

KIMURA INTERNATIONAL INC.

April 26, 2010

Mr. Kenneth G. Silva, Fire Chief
Honolulu Fire Department
636 South Street
Honolulu, HI 96813

Dear Chief Silva:

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 15, 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 comments.

Comments are numbered according to the items in your letter.

1. Provide a fire apparatus access road for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet from a fire apparatus access road as measured by an approved route around the exterior of the building or road.

2. Provide a water supply, approved by the county, capable of supplying the required fire flow for fire protection to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed or moved into or within the county.

On-site fire hydrants and mains capable of supplying the require fire flow shall be provided when any portion of the facility or building is in excess of 150 feet from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building.

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

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

Response: The project's water system will be connected to the existing 20-inch Board of Water Supply water main at the intersection of Paakea Road and Hakimo Road. By letter dated July 2, 2009, the BWS has indicated that installation of a new 16-inch water main will provide adequate fire flow for the proposed industrial park. On-site fire hydrants and fire apparatus access routes will be provided as required by the 1997 Uniform Fire Code.

Detailed construction drawings will be prepared during the design phase of the project. Civil drawings will be submitted to the HFD for review and approval.

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. 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.

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.

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

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

RECEIVED JAN 08 2010

Alice Greenwood
Concerned Elders of Waianae
87-576 Kula'aupuni Street C-101
Waianae, HI 96792

January 7, 2010

Dear Mr. Kimura,

The Concerned Elders of Waianae is very concerned about the proposal to establish an industrial park on agricultural land in Ulehawa in Nanakuli. We have reviewed the Draft Environmental Impact Statement dated November 2009 and have the following comments. Because many of the concerns we have already raised have not been addressed, we have reiterated those as well.

Concern for the Environment of Nanakuli

Industrial parks pose an unacceptably high risk to the health and well-being of neighboring communities.

Please explain how a golf course is like an industrial park? It is not obvious why the document compares the previous proposed land use with this future proposed land use, when the two uses are dissimilar.

Endangered Species

What is the state of the endangered Nehe? How much land does the Nehe need to recover and be removed from the endangered species list? What impact will construction of this industrial park have on the survival and recovery of this endangered plant species?

What impact will construction on this site have on the ecology downhill? Sacred designations for land usually have practical implications. This area was set aside as sacred, which may indicate that disturbing the soil here might have detrimental consequences on the land and ocean below it.

Air Pollution

We have concerns about the increase to annual average for particulate, sulfur dioxide and increased annual averages of daily maximum one-hour values recorded for ozone and carbon monoxide, especially because the air quality along Farrington Highway of Lualualei Naval Road is already highly impacted by heavy vehicle emission of diesel particulates.

If this project proceeds, then an air quality monitoring station must be established. Quarterly reports of air quality in the area must also be released to the public on a quarterly basis.

Please assess the exposure that residents, especially children and the elderly, will suffer from due to the environmental impact of truck emission and exhaust.

Waste Water

Increased lot coverage by large buildings and more extensive paving can increase the volume and rate of storm water discharge. Over the long-term, the cumulative impact of greater lot coverage threatens to erode the natural stream banks downstream, requiring the expensive and aesthetically and ecologically undesirable structural hardening of the drainage channel, or consequently resulting in the exceeding of the capacity of the drainage system resulting in flood conditions.

What is the general drainage pattern of the project site? Where is the nearest storm drain connection? What are your plans for the municipal storm drain facility?

Will the project be allowed to increase surface runoff onto adjoining properties or rights-of-way? When the project increases, the amount of paving the runoff concerns are real. Where will the surface waters be directed?

Currently the Lualualei Booster Station has a limited capacity of 25,000 GPD whereas the project water demand is estimated at a peak demand of 67,650 GPD. Is there a requirement for the Lualualei Booster Station to be upgraded to handle the additional demand?

Will the proposed wastewater system be sized for the peak-hour demand of 67,650 GPD? If not, how will anything greater than 22,250 GPD be handled?

The existing water system provides a 2200 GPM flow to a fire hydrant at Paakea Road and Hakimo Road. If the project requires 4000 GPM over a three-hour duration for fire, how can the proposed 16-inch line being proposed provide more water than what is available without impact to the Board of Water Supply? Who will pay for improvements to provide 4000 GPM at the point where the project will pick up the water line?

How did the developer determine the size of the waste treatment facility? Is it based on the anticipated square footage of the park? Is it based on flow? There is insufficient information about the design and what types of waste will be produced and flushed into the waste plant--human and non-human. This document does not disclose sufficiently the environmental effects of the proposed waste plant in this early stage of the approval process.

What is the reduction to potable water need by using non-potable water from the treated wastewater effluent?

Has the State Department of Health approved CBT systems for other private developments? Can you give valid working examples?

Most sludge from the City and County managed wastewater treatment facilities are "dried" for a period of time prior to disposal. Will this facility do the same? If so, is there sufficient area allowed for this process?

Who will own and operate this facility?

Why is the wastewater treatment plant located directly across from properties used for farming?

Will there be secondary treatment of the effluent proposed by the proposed project?

Can the non-potable water be used for other purposes separate from irrigation? For example, should there be contingencies made so that it may be used for toilet purposes or other industrial water purposes, i.e. washing of vehicles?

How will the community be protected from hazardous material used at the proposed project site? Will the project owner and/or operator prevent businesses in this industrial park from generating hazardous waste, especially since the community may not know what hazardous waste is being generated unless they go through every business permit for all the businesses located at the baseyard?

Will the project owner and/or operator also prohibit medical wastes from being produced or stored on the proposed site? Other industrial park locations in Hawaii have had incidents of medical waste being stored improperly for prolonged periods of time.

There is no mention that any waste generated could be sent to PVT. What if there is C&D waste generated by a specific business, e.g. recycling construction materials? Will this be handled by individual businesses?

In section 4-15.5, please correct: It is not the Mikiloa Substation but should be Mikilua.

When will they have commitments from HECO, Hawaiian Telcom and Oceanic Time Warner to provide connections? They say it is anticipated that they will provide service.

There should be a requirement for green construction of facilities. If it is not required, it will not be done because it is not necessarily seen as cost effective in the short term.

What is being done to reduce the normal carbon footprint of a light industrial park?

Stormwater management: How will storm water management be managed for each lot and then subsequently for the entire property? Who will be responsible in the long term? Where will the storm water go?

There is discussion regarding a detention area of an approximately 100-foot wide strip of land mauka of the industrial lots to accommodate peak runoff from the hillside. While this may handle the amount of flow that will occur based on the undeveloped hillside and the developed lots, this should be a retention basin considering the pollutants that may (probably will) occur

based on the businesses that can be anticipated to be located within the baseyard. This becomes important, especially if it possible that hazardous waste may be generated on site (see section 4-15.4).

Will collection/separation systems be established to separate and collect contaminants from impermeable surfaces in the industrial park so that they do not go down the drain with the storm water runoff.

Ground & Soil

Does Tropic Land have plans to remove the soil?

For slab-on-grade construction, what plans do you have for altering the topography (excavating, filing, and grading)?

How many acres does Tropic Land plan for soil disturbance? If it's greater than one acre, Tropic Land will need NPDES permit.

Development on unstable soils could result in adverse hazardous conditions. Where locations have deposits of unstable soils, slow-moving landslides can cause property damage.

Please conduct a soil study. The soil on this lot is not adequate for safely constructing warehouses, as Tropic Land proposes to do.

Concern for the Quality of Life in Nanakuli

The proposed industrial park is out of sync with the rural, agricultural lifestyle of Lualualei Valley residents.

The few noxious commercial activities allowed on properties abutting Lualualei Naval Road have, over the short-term, compromised the quality of life for residents along Farrington Highway and on Hakimo Road. Despite this, many residents continue to perpetuate their farming traditions, growing food and raising animals on their agricultural plots. The addition of one more "urban-like" usage next to working agricultural farms and residential communities without addressing the reduction, elimination or prevention of serious public health issues is immoral.

Allowing this industrial park to be established in the middle of this longstanding rural residential and agricultural community will further compromise the public health for citizens in the Lualualei ahupuaa.

Noise

The project is not in a highly developed area. Existing ambient noise levels are relatively low. The noise sources will increase from traffic noise due to large volumes of traffic and heavy vehicles that will use Hakimo Road, the primary traffic access to the project.

What are your hours of operation?

Please estimate the number of trucks that will access the proposed project.

Water Supply

The project is not served by the existing water lines and water meters. How will buildings be served if there are no existing laterals for water lines?

Are the existing water lines for agricultural lots of sufficient size and adequate to serve the urban needs of the new buildings to be constructed and the changed uses of the new users who occupy them?

Tropic Land will use sub-standard quality water to irrigate the project which will require better management practices and a plan for managing the use of R-water. Food safety concerns are real because the properties downstream are farm lands. Food safety certifications may be jeopardized by potential contamination from R-water runoffs.

Does Tropic Land plan to have an automated irrigation system? If yes, then will Tropic Land use waste plan water to irrigate? Tropic Land must install a backflow preventer to eliminate cross contamination of the municipal water system if an automatic irrigation system is installed to irrigate the landscape.

Is the water supply to the proposed site adequate to meet needs and fire insurance requirements? If not, what plan does the BWS have to expand capacity or extend service?

Why does the project require 90% of all the available water to be used?

Will raw water for industrial use be drawn from wells on site?

Why does the document say wastewater from the industrial park will be typical of domestic wastewater? How is industrial wastewater like domestic wastewater?

How will the promises made in the second paragraph of section 4.46 be enforced?

Are there specific, funded plans for the expansion of the water supply to the project site?

Traffic Congestion

Please complete a traffic study for the anticipated increased traffic on H-1, Farrington Highway, Hakimo Road, and any other access ways.

Please disclose the understanding with the Navy for the use of the naval road. Can Tropic Land guarantee that the Hakimo Road will not be used?

The existing Hakimo roadway and the intersection of Farrington Highway are not adequate to serve the traffic to the proposed park, which will result in increased traffic flow through the residential community at the Princess Kahanu Estates.

The existing roadway is non-standard as it contains no drainage, no sidewalks, curbs, or gutters. Access to the PROPOSED project is via an existing NON-CITY-LIKE standard road. More discussion is warranted regarding the roadway and roadway improvements with Hakimo residents.

The number of employees, customers and suppliers associated with the park using the Hakimo Road access to the proposed project will inevitably increase.

Is the proposed site served adequately by access roads? Are there additional access roads planned?

Is traffic congestion a problem on the access road to the project? On state highways? In supplier areas? In market areas?

What are the road limits?

Sense of Community

Ulehawa is subject to multiple threats to health originating from increased heavy truck traffic adversely impacting the quality of life for residents. How does the project strive for a reduction in residents' exposure to air pollution from diesel particulate emissions?

Please demonstrate there is demand for industrial space at the back of a valley in Waianae. What is the economic feasibility of the park?

Industrial parks often offer desirable site characteristics to companies, such as proximity to existing industrial centers and easy access to transportation. The proposed project does not offer easy access for businesses, so why is the project sited here? If the proposed project proposes to link to regional businesses, which ones?

What is the demand to locating in a region far from the centers of commerce and with traffic access challenges?

Does our state general plan to regional development plan support urban development and industrial commercial growth moving into rural Waianae? Is there a plan in effect? Is there a plan proposed?

What is the non-market value of the open space that would be lost if the industrial park were built?

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs.

Does the proposed economic development project have a plan to reduce waste and increase resource efficiency? Does the project have a mindset to reach zero waste?

Is there a plan to coordinate the activities of the firms to increase efficient use of raw materials, reduce waste outputs, conserve energy and water resources, and reduce transportation requirements?

Companies co-locate so that water, energy sharing and recycling of low-value by-products become physically and economically feasible by closely coordinating their production processes and infrastructure to maximize efficiency.

Does the park have as its goal the elimination of wastes?

Does the change from agricultural to urban have lower environmental impact than traditional business ventures allowed on agricultural lands?

How does the park address factors contributing substantially to problems in recruitment of labor, access for outbound and inbound shipments, accessibility to business and professional services, access to an interstate highway, proximity to suppliers and/or distribution of products, etc.?

There are major environmental problems facing residents in Ulehawa. Where is the discussion on the management, the proposed industrial park policies and procedures, and technology transfer options for addressing these problems?.

Where is the discussion on the ratio of payoffs and risks and of unacceptable risk sharing and outcomes?

Where is the discourse and evaluation concerning whether the outcomes will lead to results that people expected and that the petitioner promised would result from the creation of a light industrial park in Ulehawa?

Where is the discussion on the "state of the art" in assessing outcomes and consequences and exploring their distributional effects?

Do all affected parties have equal access to the benefits and risks? Should there be equitable loss or gain compared to other parties is that distribution as a result of chance or to outcomes or both?

Where is the discussion to justify the risks to residents, the relative share of their risk compared to other parties, including the privilege of one party and the surplus risk of other parties?

The community benefit package provision is justification for and evidence that the developer recognizes that the developer benefits more from the project than any other party and asks the other parties to take a larger share of the risk than any other party. This arrangement can only be sustained if the inequitable additional benefits coming from an inequitable solution overcompensates the disadvantages associated with the inequalities stemming from this proposed

project for Ulehawa. Where is the discussion on the risk and benefits for farmers across and downwind from the development?

Where is the discussion of their participation and involvement in the decision-making process, design and agreement to the provisions for the community benefit package?

Where is the discussion that describes how the community benefit package system of delivery of benefits and services ensures that the unit making the key decision of having the most authority corresponds to the unit bearing the primary costs for the benefit?

Where is the assurance to prevent, minimize or eliminate mismatch and benefit spillover?

Because all humans are created equal and should have an equal share of the earth's resources in the absence of good reasons, the reliance on a community benefits package provision alone cannot legitimatize inequitable solutions. Beyond voluntary agreements, is the situation in which the agreement is prepared free of coercion and unrelated to the status quo?

The developer needs to involve the community in the identification and development of models for compensating the community for its inequitable risk and benefits. Resolving the issue by paying monetary compensation to a community is regarded as distributing bribes. Where is the discussion for a model of joint ownership of the facility by developer and the community?

Where is the discussion about variability of options? This option provides two major benefits for the community: sharing the revenues and sharing control.

Where is the discussion about the set of criteria suitable for evaluating future industrial parks, such as easy access to transportation corridors, proximity to suppliers and/or markets, etc.? There is no discussion about the equity of exposure. Are all groups of the community or the respective constituency exposed in some way to the potential disadvantages of the proposed project? What means has the developer taken to avoid a distinction between more or less affected citizens? Shouldn't members of the more affected groups enjoy a higher probability of benefits?

Where is the discussion about quantifying and qualifying the market and nonmarket cost for the loss of the traditional and unique significance of the open space environmental amentias associated with the Maui accounts and its value to the emerging visitor market in Ko Olina?

Where is the discussion about the permissibility of a waste plant in an agricultural valley?

Where is the discussion about the "smart growth" and transit-oriented dependent development and its relevance to building our way out of congestion?

Please document the history of farming in Nanakuli. In recent history, the parcel of land proposed for development was used to raise crops of all kinds. In fact, throughout Hawaii's history, Nanakuli was recognized as a famed agricultural community with lush farms that helped

to feed the people of Oahu. With proper planning, Nanakuli can manage its economic development to provide jobs while re-embracing its farming history.

Why is this industrial park proposed for a property at the back of a valley in the middle of a rural residential and agricultural community? Please confirm that most industrial parks are located along major access routes – like highways – and near supply hubs.

The two alternative uses discussed in this document are golf course and industrial park. Why was farming not analyzed? Please compare the potential environmental risks and benefits of farming on this parcel of land with the consequences of establishing an industrial park.

Does the change from Agricultural to Urban have lower environmental impact than traditional business ventures allowed on Agricultural lands?

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs.

What is the non-market value of the open space that would lost if the industrial park were built?

Produce a study to capture the observed historical economic development trends to forecast the vocational behavior of the individual households and firms in a construct consistent with economic theory to determine that the industrial park will create jobs accessory to the economic activities in the Waianae region?

Concern for the Cultural Resources of the Area

The consultant limits his/her historical cultural review to the human-built environment and fails to include, especially when dealing with ancient culture, those cultural aspects that persists in traditional stories beyond the physical man-made remnants, such as gods, natural phenomena, spirituality, etc. Because of this narrow evidence cited by the consultant the cultural significance of the area is ignored and diminished.

Bulldozing the hillsides of Lualualei for an industrial park will irreparably undermine the immense cultural significance of this region. The parcel Tropic Land seeks to urbanize, Lot 205A, is in the center of one of the most important viewpoints on the Waianae Coast.

The demigod Maui is a central figure in the cosmology of Native Hawaiians. He is the man that made the Hawaiian way of life possible, by snaring the sun in order to slow its path across the sky and lengthen the day for the benefit of all a Hawaiians. It is said that he was born along the hillsides of Lualualei.

Please document the extensive cultural history and traditional practices of the region affected by Tropic Land proposal.

Would the proposed industrial park block access to the Nioiula Heiau? What will be the access path to the Heiau if the project is allowed?

Where is the stone that Maui sunned himself on? What impact would the proposed project have on this sacred pohaku?

Where is the cave that Maui used as a child? What affect would the proposed project have on this cultural significant site?

What will Tropic Land do to protect Ulehawa stream if the proposed project is allowed?

What will Tropic Land do to preserve the many loʻi terraces documented in the area of the proposed project site?

KIMURA INTERNATIONAL INC.

April 26, 2010

Ms. Alice Greenwood
Concerned Elders of Waianae
87-576 Kula'aupuni Street, C-101
Waianae, HI 96792

Dear Ms. Greenwood:

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. 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.

Questions are reviewed under the headings and in the order presented in your letter.

Concern for the Environment of Nanakuli

Please explain how a golf course is like an industrial park? It is not obvious why the document compares the previous proposed land use with this future proposed land use, when the two uses are dissimilar.

> ***Response 1***: The golf course is discussed as an alternative land use because the landowner has received entitlements to build such a project. *Section 4.2*
>
> ***Text from the FEIS (p. 4-1):***
>
> The golf course alternative is based on an earlier master plan involving approximately 259 acres of Tropic Land's land holdings, affecting TMKs 8-7-9: 2 (proposed industrial park site) and 8-7-10: 6 and 10 (located across Lualualei Naval Road). In addition to the regulation 18-hole golf course, the master plan includes a clubhouse, driving range, and nursery facility. The City Council approved a zoning change and Unilateral Agreement, effective September 24, 1996, that entitles the landowner to build the golf course project.

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

Endangered Species

What is the state of the endangered Nehe? How much land does the Nehe need to recover and be removed from the endangered species list? What impact will construction of this industrial park have on the survival and recovery of this endangered plant species?

What impact will construction on this site have on the ecology downhill? Sacred designations for land usually have practical implications. This land was set aside as sacred, which may indicate that disturbing the soil here might have detrimental consequences on the land and ocean below it.

> ***Response 2***: There are no threatened or endangered species in the project area. The proposed industrial park will not adversely affect any threatened or endangered species or critical habitat. *Section 5.5*
>
> ***Text from the FEIS (p. 5-18)***:
>
> No plant species classified as endangered or threatened or proposed as a candidate for listing as threatened or endangered by the Federal or State government was found in the project area.
>
> No part of the project site is included in a federally designated plant critical habitat.

Air Pollution

We have concerns about the increase to annual average for particulate, sulfur dioxide and increased annual averages of daily maximum one-hour values recorded for ozone and carbon monoxide, especially because the air quality along Farrington Highway of [sic] Lualualei Naval Road is already highly impacted by heavy vehicle emissions of diesel particulates.

If this project proceeds, then an air quality monitoring station must be established.

Please assess the exposure that residents, especially children and the elderly, will suffer from due to the environmental impact of truck emission and exhaust.

> ***Response 3***: Operations of the proposed light industrial park, including increased truck emission and exhaust, are not expected to generate long-term adverse effects on air quality. *Section 5.10*

Text from FEIS (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.

Waste Water

What is the general drainage pattern of the project site? Where is the nearest storm drain connection? What are your plans for the municipal storm drain?

Will the project be allowed to increase surface runoff onto adjoining properties or rights-of-way? When the property increases the amount of paving the runoff concerns are real. Where will the surface waters be directed?

Response 4: Drainage facilities constructed for the project will not be connected to the municipal storm drain system. Retention facilities will be constructed to retain increases in storm drainage runoff that occur as a result of the proposed project (i.e., to preclude a net increase in runoff). Under existing conditions, runoff from the property is conveyed

[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.

across Lualualei Naval Access Road through culverts. On the north side of the road, runoff flows through Ulehawa Stream, the natural drainage way. *Sections 3.1 and 5.3*

Text from the FEIS (p. 5-11):

Retention (or detention) facilities are typically constructed to retain increases in storm runoff that occurs as a result of development. These facilities will include open basins, detention ponds, and/or underground storage facilities. Tropic Land proposes to construct an unlined drainage swale or channel in the 100-feet wide strip of land *mauka* of the industrial lots. This detention basis will be designed to accommodate peak flow runoff from the hillside. By incorporating these elements into the industrial park's design, there will be no net increase in the discharge of peak storm runoff from the project site due to existing conditions.

Currently the Lualualei Booster Station has a limited capacity of 25,000 GPD whereas the project water demand is estimated at a peak demand of 67,650 GPD. Is there a requirement for the Lualualei Booster Station to be upgraded to handle the additional demand?

Will the proposed wastewater system be sized for the peak-hour demand of 67,650 GPD? If not, how will anything greater than 22,250 GPD be handled?

Response 5: All wastewater generated by the proposed development will be processed by an on-site wastewater treatment facility. There will be no impact on the municipal wastewater system. *Sections 3.1 and 5.15.2*

Text from FEIS (p. 3-3):

Wastewater System. The major components of the proposed wastewater system are the gravity collection system, wastewater treatment unit, and effluent disposal system. The system will be designed and constructed to State and County standards, but the on-site wastewater system will be privately operated and maintained.

The existing water system provides a 2200 GPM flow to a fire hydrant at Paakea Road and Hakimo Road. If the project requires 4000 GPM over a three-hour duration for fire, how can the proposed 16-inch line be proposed provide more water than what is available without impact to the Board of Water Supply? Who will pay for improvements to provide 4000 GPM at the point where the project will pick up the water line?

Response 6: The developer will construct the 16-inch water line to be connected to the existing 20-inch water main at the intersection of Paakea Road and Hakimo Road.

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 Paʻakea Road and Hakimo Road. A new 16-inch transmission line will be located along Paʻakea 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 Paʻakea 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.

How did the developer determine the size of the waste treatment facility? Is it based on the anticipated square footage of the park? Is it based on flow? There is insufficient information about the design and what types of waste will be produced and flushed into the waste plant—human and non-human.

> ***Response 7***: The preliminary size of the wastewater treatment facility was calculated by a licensed civil engineer based on a projected *de facto* population. *Appendix A, Preliminary Engineering Report*

Text from the FEIS (p. 5-60):

> Based on development information shown in Table 17, the average daily demand for the development is estimated to be 22,550 GPD. The maximum daily demand is estimated to be 45,100 GPD with a Peak Hour Demand of 67,650 GPD.

Table 17
Estimated Drinking Water Use Demand

Land Use	No. of Lots	Average De Facto Population*	GPD/Capita	Other Usage (GPD/Lot)	Average Daily Demand (GPD)
Industrial	41	10	25	300	22,550

* De facto population is based on a percentage of employment to estimate employees on site throughout the work day.

Source: Hida, Okamoto & Associates, Inc. *Preliminary Engineering Report*, January 2010

What is the reduction to potable water need by using non-potable water from the treated wastewater effluent?

Response 8: Non-potable water will replace the use of potable water for irrigation.

Text from the FEIS (p. 5-64):

In the long-term, treated effluent from the wastewater treatment unit is expected to supply the entire estimated demand for irrigation water on the project site.

Has the State Department of Health approved CBT systems for other private developments? Can you give valid working examples?

Response 9: Use of the cyclic biological treatment (CBT) process for wastewater treatment is not uncommon in Hawaii. Among other locations, this process is being used at Sea Life Park, Makaha East Country Club, Waialua Ocean Villas, and the Ponds at Punaluu.

Most sludge from the City and County managed wastewater treatment facilities are "dried" for a period of time prior to disposal. Will this facility do the same? If so, is there sufficient area allowed for this process?

Response 10: If sludge needs to be removed from the treatment plant, the process will be in compliance with applicable regulations.

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

Effluent Disposal. The treated wastewater effluent will be chlorinated, disinfected, and pumped to a non-drinking water irrigation system. In the early stages of development, when wastewater levels are relatively low, effluent may be diluted with drinking water for irrigation purpose. Ultimately, 100% of the estimated irrigation water requirement can be supplied by the treated effluent. Sludge will be removed and disposed of in accordance with applicable State laws.

Who will own and operate this facility?

Response 11: The facility will be owned and operated by the condominium owners association. *Sections 3.1 and 5.15.2*

Text from the FEIS (p. 3-3):

Wastewater System. The major components of the proposed wastewater system are the gravity collection system, wastewater treatment unit, and effluent disposal system. The system will be designed and constructed to State and County standards, but the on-site wastewater system will be privately operated and maintained.

Why is the wastewater treatment plant located directly across from properties used for farming?

Response 12: The wastewater system will be designed as a gravity flow system; therefore, the treatment plant is located where ground elevation is lowest. The underground tank will watertight and mechanical equipment enclosed in a structure. *Sections 3.1 and 5.15.2*

Will there be secondary treatment of the effluent proposed by the proposed project?

Can the non-potable water be used for other purposes separate from irrigation? For example, should there be contingencies made so that it may be used for toilet purposes or other industrial purposes, i.e., washing of vehicles?

Response 13: Other uses of treated effluent, in addition to irrigation, will be explored.

How will the community be protected from hazardous material used at the proposed project site? Will the project owner and/or operator prevent businesses in this industrial park from generating hazardous waste, especially since the community may not know what hazardous waste is being generated unless they go through every business permit for all the businesses located at the baseyard?

Will the project owner and/or operator also prohibit medical wastes from being produced or stored on the proposed site? Other industrial park locations in Hawaii have had incidents of medical waste being stored improperly for prolonged periods of time.

Response 14: All unit owners will be required to comply with State and federal regulations for the handling, storage, treatment, transport, and disposal of hazardous wastes and medical wastes. *Section 5.15.4*

Text from the FEIS (p. 5-66):

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. Once specific businesses are established at the site, facility operators will be encouraged to contact the State of Hawai‘i Department of Health Compliance Assistance Office (CAO) to ensure that the proper State and federal environmental regulations are followed.

There is no mention of any waste generated could be sent to PVT. What if there is C&D waste generated by a specific business, e.g., recycling construction materials? Will this be handled by individual businesses?

> ***Response 15***: Construction and demolition debris will be disposed of at PVT, the only facility for these types of waste on the island.

In section 4-15.5, please correct: It is not the Mikiloa Substation but should be Mikilua.

> ***Response 16***: Correction has been made.
>
> ***Text from the FEIS (p. 5-66)***:
>
> There is an existing wood joint pole line along the Honolulu side of the Lualualei Naval Access Road right-of-way that abuts the project site. All of the poles contain Hawaiian Electric Co. (HECO) 3-phase, 11.5 kV, Hawaiian Telcom, and Oceanic Time Warner Cable lines. Power to this primary line is supplied by the ~~Mikiloa~~ Mikilua Substation Feeder No. 3 on Pa'akea Road which has available capacity to serve the proposed development.

When will they have commitments from HECO, Hawaiian Telcom and Oceanic Time Warner to provide connections?

> ***Response 17***: Coordination with utility companies for provision of electrical and telecommunication services will occur during the detailed design and engineering phase of the project.

There should be a requirement for green construction of facilities. If it is not required, it will not be done because it is not necessarily seen as cost effective in the short term.

What is being done to reduce the normal carbon footprint of a light industrial park?

> ***Response 18***: To reduce the waste stream, Tropic Land will develop a recycling plan for the construction and operational phases of the project. Where possible and appropriate, the project will specify or use products with recycled content, such as pavement material, concrete aggregate fill, and steel. *Sections 5.15.4 and 5.15.5*
>
> ***Text from the FEIS (p. 5-66)***:
>
> Refuse generated by the industrial park will be collected by a private refuse collection company for disposal at the H-POWER Plant or Waimanalo Gulch landfill. 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, such as pavement material, concrete aggregate fill, and steel. In other cases, products produced locally will be used where possible and appropriate, including soil amendment and hydro-mulch. Individual unit owners will also be encouraged to develop and implement their own recycling plans.

Text from the FEIS (p. 5-67):

The proposed Nānākuli Community Baseyard will place additional demands on the electrical and telecommunication utilities. Tropic Land will work with each utility for timely design and construction of utility infrastructure and delivery of required services. Utility lines within the project area will be placed underground to mitigate visual impacts.

Energy efficiency design guidelines will be incorporated into the project's Covenants, Conditions, and Restrictions (CC&Rs) to promote energy conservation. Among the guidelines that will be considered for inclusion in the CC&Rs are:

- Use of heat pumps, solar heating systems, and photovoltaic systems.
- Use of high-efficiency appliances and air conditioners.
- Use of timer or motion-sensing light and air condition controls.
- Promotion of energy saving opportunities through green building design, including building orientation and insulation.
- Use of landscaping to minimize heat islands, with preference for native, drought-tolerant plant species.

Stormwater management: How will storm water management be managed for each lot and then subsequently for the entire property? Who will be responsible in the long term? Where will the storm water go?

Response 19: An integrated system of drainage facilities will be developed for the overall project. The condominium owners association will be responsible for long-term management of drainage facilities.

Text from the FEIS (p. 5-11):

Retention (or detention) facilities are typically constructed to retain increases in storm runoff that occurs as a result of development. These facilities will include open basins, detention ponds, and/or underground storage facilities. Tropic Land proposes to construct an unlined drainage swale or channel in the 100-feet wide strip of land *mauka* of the industrial lots. This detention basis will be designed to accommodate peak flow runoff from the hillside. By incorporating these elements into the industrial park's

design, there will be no net increase in the discharge of peak storm runoff from the project site due to existing conditions.

There is discussion regarding a detention area of an approximately 100-foot wide strip of land mauka of the industrial lots to accommodate peak runoff from the hillside. While this may handle the amount of flow that will occur based on the undeveloped hillside and the developed lots, this should be a retention basin considering the pollutants that may (probably will) occur based on the businesses that can be anticipated to be located within the baseyard. This becomes important; especially if it is possible that hazardous waste may be generated on site (see section 4-15.4).

Will collection/separation systems be established to separate and collect contaminants from impermeable surfaces in the industrial park so they do not go down the drain with the storm water runoff.

Response 20: The drainage system will handle storm water flows in accordance with City regulations and professional engineering standards. There will be no connection to municipal storm drains. *Sections 3.1 and 5.3*

Text from the FEIS: See Response 19

Ground & Soil

Does Tropic Land have plans to remove the soil?

For slab-on-grade construction, what plans do you have for altering the topography (excavating, filing [*sic*], and grading)?

How many acres does Tropic Land plan for soil disturbance? If it's greater than one acre, Tropic Land will need NPDES permit

Please conduct a soil study. The soil on this lot is not adequate for safely constructing warehouses, as Tropic Land proposes to do.

Response 21: According to preliminary estimates, grading will involve approximately 450,000 cubic yards. *Section 5.1*
Tropic Land anticipates the need for a NPDES permit. *Section 1.6*
A geotechnical study will be conducted during the project design phase. *Section 5.4*

Text from the FEIS (p. 5-3):

The grading concept is to provide relatively level lots. Total earthwork quantities of cut and fill for the development is estimated to be approximately 450,000 cubic yards (CY). An effort to balance earthwork quantities is expected to minimize the cost of purchasing off-site borrow material and/or disposing of excess excavated material at an off-site location. Grading operations will be in conformance with the applicable ordinances of the City and County of Honolulu.

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.

Concern for the Quality of Life in Nanakuli

The proposed industrial park is out of sync with the rural, agriculture lifestyle of Lualualei Valley residents.

Response 22: Comment noted.

Noise

The project is not in a highly developed area. Existing ambient noise levels are relatively low. The noise sources will increase from traffic noise due to large volumes of traffic and heavy vehicles that will use Hakimo Road, the primary traffic access to the project.

What are your hours of operation?

Please estimate the number of trucks that will access the proposed project.

Response 23: According to the Traffic Impact Assessment Report, the project is expected to generate 522 vehicles during the peak morning period and 518 vehicles during the peak afternoon period. Tropic Land intends to use Lualualei Naval Access Road as the primary access for the project. The U.S. Navy has agreed to grant an association of adjoining property owners, including Tropic Land, a long term easement to use Lualualei Naval Access Road. Therefore, Hakimo Road is not expected to experience large volumes of traffic and noise from heavy trucks. Companies located at the light industrial park are anticipated to keep normal business hours. *Section 5.11*

Text from the FEIS (p. 5-38):

Tropic Land LLC has reached an agreement with the U.S. Navy for the use of the Lualualei Naval Access Road. The Navy has agreed to grant a long term easement to 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. Tropic Land LLC is currently discussing the form of a definitive easement agreement with the Navy.

Water Supply

The project is not served by the existing water lines and water meters. How will buildings be served if there are no existing laterals for water lines?

Are the existing water lines for agricultural lots of sufficient size and adequate to serve the urban needs of the new buildings to be constructed and the changed uses of the new users who occupy them?

Response 24: Tropic Land will construct laterals off the new 16-inch water main that, in turn, will connect to the existing 20-inch water main at the intersection of Paakea Road and Hakimo Road.

Text from the FEIS: See Response 6

Tropic land will use sub-standard quality water to irrigate the project which will require better management practices and a plan for managing the use of R-water. Food safety concerns are real because the properties are downstream from farm lands. Food safety certifications may be jeopardized by potential contamination from R-water runoffs.

Does Tropic Land plan to have an automated irrigation system? If yes, then will Tropic Land use waste plan water to irrigate? Tropic Land must install a backflow preventer to eliminate cross contamination of the municipal water system if an automatic irrigation system is installed to irrigate the landscape.

Response 25: Tropic Land will comply with the requirements for safe and proper use of recycled water, as regulated by the Hawaii State Department of Health under Title 11, Chapter 62, Hawaii Administrative Rules.

Text from the FEIS (p. 5-64):

The project area is located entirely within the No Pass zone, which means that untreated effluent cannot be injected underground. The project proposes to use treated effluent for surface discharge which is a permitted method of disposal. The State of Hawai‘i, Department of Health, Wastewater Branch regulates the application of recycled water

under Hawai‘i Administrative Rules Section 11-62-27. According to the Guidelines for Treatment and Use of Recycled Water, allowable R-1 irrigation uses include golf courses, parks, playgrounds, schoolyards, athletic fields, residential property managed by an irrigation supervisor, and roadsides and medians. The project site currently has no R-1 distribution system.

Is the water supply to the proposed site adequate to meet needs and fire insurance requirements? If not, what plan does the BWS have to expand capacity or extend service?

Why does the project require 90% of all the available water to be used?

Response 26: The water system will be designed to meet fire flow capacity. Construction plans for the project's water system must be reviewed and approved by the Honolulu Fire Department and Board of Water Supply.

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. The easement and water systems will be dedicated to the BWS.

Will raw water for industrial use be drawn from wells on site?

Response 27: Existing wells on site are capped and will remain capped.

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

Groundwater will not be used for the proposed light industrial park and the existing wells will remain capped.

Why does the document say wastewater from the industrial park will be typical of domestic wastewater? How is industrial wastewater like domestic wastewater?

Response 28: It is expected that wastewater will be generated primarily by employees (rather than industrial processes) and, therefore, is characterized as domestic.

Text from the FEIS: Information in the response provided for clarification.

How will the promises made in the second paragraph of section 4.46 be enforced?

Response 29: The DEIS did not have a Section 4.46, but we are assuming this question relates to Section 4.16 regarding placement of the treatment unit below ground and landscaping around the perimeter fence. An underground treatment tank is standard

design for the proposed cyclic biological treatment technology. Landscaping is planned for the entire length of the Lualualei Naval Access Road frontage—not only the wastewater treatment area—and will incorporate palm trees that are already planted.

Text from the FEIS (p. 3-2):

Buffers and Setbacks. The existing line of palm trees will remain as a 30-foot landscaped setback along the Lualualei Naval Access Road frontage.

Are there specific, funded plans for the expansion of the water supply to the project site?

Response 30: Extension of water service to the project site will be funded solely by Tropic Land.

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

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.

Traffic Congestion

Please complete a traffic study for the anticipated increased traffic in H-1, Farrington Highway, Hakimo Road, and any other access ways.

Response 31: A traffic impact assessment report has been completed (The Traffic Management Consultant, January 2010, *Appendix E*) and included in the FEIS.

Text from the FEIS: Refer to Appendix E

Please disclose the understanding with the Navy for the use of the naval road. Can Tropic Land guarantee that the Hakimo Road will not be used?

The existing Hakimo roadway and the intersection of Farrington Highway are not adequate to serve the traffic to the proposed park, which will result in increased traffic flow through the residential community at the Princess Kahanu Estates.

The existing roadway is non-standard as it contains non drainage, no sidewalks, curbs, or gutters. Access to the PROPOSED project is via an existing NON-CITY-LIKE standard road [*emphasis in original*]. More discussion is warranted regarding the roadway and roadway improvements with Hakimo residents.

The number of employees, customers and suppliers associated with the park using the Hakimo Road access to the proposed project will inevitably increase.

Is the proposed site served adequately by access roads? Are there additional access roads planned?

Is traffic congestion a problem on the access road to the project? On state highways? In supplier areas? In market areas?

What are the road limits?

> ***Response 32***: Tropic Land intends use Lualualei Naval Access Road as the primary access road for the project. Correspondence related to the use of Lualualei Naval Access Road between the Navy and Tropic Land is included in *Appendix K* of the FEIS. Specific improvements to Farrington Highway and Lualualei Naval Access Road will be determined in consultation with the Navy, Hawaii State Department of Transportation, and other stakeholders.
>
> ***Text from the FEIS (p. 5-38)***:
>
> Tropic Land LLC has reached an agreement with the U.S. Navy for the use of the Lualualei Naval Access Road. The Navy has agreed to grant a long term easement to 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. Tropic Land LLC is currently discussing the form of a definitive easement agreement with the Navy. Correspondence with the Navy regarding Lualualei Naval Access Road may be found in Appendix K.

Sense of Community

Ulehawa is subject to multiple threats to health originated from increased heavy truck traffic adversely impacting the quality of life for residents. How does the project strive for a reduction in residents' exposure to air pollution from diesel particulate emissions?

> ***Response 33***: The FEIS concludes that project-related air quality impacts will not be significant, and that emission concentrations will be within State and federal air quality standards. *Section 5.10*
>
> ***Text from the FEIS***: See Response 3

Please demonstrate there is demand for industrial space at the back of a valley in Waianae. What is the economic feasibility of the park?

Industrial parks often offer desirable site characteristics to companies, such as proximity to existing industrial centers and easy access to transportation. The proposed project does not offer easy access for businesses, so why is the project sited here? If the proposed project proposes to link to regional businesses, which ones?

What is the demand to locating in a region far from the centers of commerce and with traffic access challenges?

> ***Response 34***: 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. Nonetheless these businesses have serious interest and provided contact information to receive a Public Report. They are in the following types of business: trucking and hauling, equipment handling, general contracting, and trades (painting, welding, electrical, masonry, landscaping). All uses would conform to the proposed zoning classification of I-1, Limited Industrial District. 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. *Chapter 2*
>
> ***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 Waʻianae. The remaining six businesses are currently located in Honolulu, ʻAiea, Pearl City, ʻEwa Beach, and Kapolei.
>
> The business incubator is proposed to afford a home for start up businesses. The Waiʻanae Coast Coalition, a non-profit organization, is leading the planning effort for the business incubator component of the project.

Does our state general plan to regional development plan support urban development and industrial commercial growth moving into rural Waianae? Is there a plan in effect? Is there a plan proposed?

> ***Response 35***: Conformance with the Hawaii State Plan, Oahu General Plan, and Waianae Sustainable Communities Plan is discussed in *Chapter 6* of the FEIS. Tropic Land's application to amend the Rural Community Boundary in the Waianae Sustainable Communities Plan is being considered as part of the ongoing five-year review process.

Text from the FEIS: See Chapter 6 for comprehensive discussion of the project's relationship the existing land use plans, policies, and controls. This material is not duplicated in this letter due to its length.

What is the non-market value of the open space that would be lost if the industrial park were built?

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs?

Response 36: Food security is an issue of statewide importance. However, first-hand accounts of farming experience on the project indicate that only 15-17 acres were cultivated, though unprofitably. Given the availability of farmland with higher quality soils and irrigation water elsewhere on Oahu and throughout the state, the small amount of agricultural land on the project site will not resolve larger food concerns. *Appendix L, Statements on Past Farming Activity*

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.

Does the proposed economic development project have a plan to reduce waste and increase resource efficiency? Does the project have a mindset to reach zero waste?

Is there a plan to coordinate the activities of the firms to increase efficient use of raw materials, reduce waste outputs, conserve energy and water resources, and reduce transportation requirements?

Does the park have as its goal the elimination of wastes?

> ***Response 37***: To reduce the waste stream, Tropic Land will develop a recycling plan for the construction and operational phases of the project. Where possible and appropriate, Tropic Land will specify or use products with recycled content, such as pavement material, concrete aggregate fill, and steel. *Section 5.15.4*
>
> Text from the FEIS: See Response 18

Does the change from agricultural to urban have lower environmental impact than traditional business ventures allowed on agricultural lands?

> ***Response 38***: Impacts and benefits would differ between light industrial businesses and agricultural businesses. *Section 4.3*
>
> ***Text from the FEIS***: See Response 36

How does the park address factors contributing substantially to problems in recruitment of labor, access for outbound and inbound shipments, accessibility to business and professional services, access to an interstate highway, proximity to suppliers and/or distribution of products, etc?

There are major environmental problems facing residents in Ulehawa. Where is the discussion on the management, the proposed industrial park policies and procedures, and technology transfer options for addressing these problems?
Where is the discussion on the ratio of payoffs and risks and of unacceptable risk sharing and outcomes?

Where is the discourse and evaluation concerning whether the outcomes will lead to results that people expected and that the petitioner promised would result from the creation of a light industrial park in Ulehawa?

Where is the discussion on the "state of the art" in assessing outcomes and consequences and exploring their distributional effects?

Do all affected parties have equal access to the benefits and risks? Should there be equitable loss or gain compared to other parties is that distribution as a result of chance or to outcomes or both?

Where is the discussion to justify the risks to residents, the relative share of their risk compared to other parties, including the privilege of one party and the surplus risk to other parties?

> ***Response 39***: Economic and income benefits are discussed in *Section 5.13*
>
> ***Text from the FEIS***: Short- and long-term impacts on private employment and income, and on public (fiscal) resources are described in Section 5.13 (pages 5-56 and 5-57). This material is not duplicated in this letter due to its length.

The community benefit package provision is justification for and evidence that the developer recognizes that the developer benefits more from the project than any other party and asks the other parties to take a larger share of the risk than any other party. This arrangement can only be sustained if the inequitable additional benefits coming from an inequitable solution overcompensates the disadvantages associated with the inequalities stemming from this proposed project for Ulehawa. Where is the discussion on the risk and benefits for farmers across and downwind from the development?

Where is the discussion of their participation and involvement in the decision-making process, design and agreement to the provisions for the community benefit package?

Where is the discussion that describes how the community benefit package system of delivery of benefits and services ensures that the unit making the key decision of having the most authority corresponds to the unit bearing the primary costs for the benefit?

Where is the assurance to prevent, minimize or eliminate mismatch and benefit spillover?

Because all humans are created equal and should have an equal share of the earth's resources in the absence of good reasons, the reliance on a community benefits package provision alone cannot legitimize inequitable solutions. Beyond voluntary agreements, is the situation in which the agreement is prepared free of coercion and unrelated to the status quo?

The developer needs to involve the community in the identification and development of models for compensating the community for its inequitable risk and benefits. Resolving the issue by paying monetary compensation to a community is regarded as distributing bribes. Where is the discussion for a model of joint ownership of the facility by developer and the community?

Where is the discussion about variability of options? This option provides two major benefits for the community: sharing the revenues and sharing control.

Where is the discussion about the set of criteria suitable for evaluating future industrial parks, such as easy access to transportation corridors, proximity to suppliers and/or markets, etc? There is no discussion about the equity of exposure. Are all groups of the community or the respective constituency exposed in some way to the potential disadvantages of the proposed project? What means has the developer taken to avoid a distinction between more or less affected citizens? Shouldn't members of the more affected groups enjoy a higher probability of benefits?

> ***Response 40***: The community benefits package represents Tropic Land's efforts to support and enhance the life of the community of which it is a part. Although the specific structure of the fund has not been determined yet, Tropic Land expects that local residents will participate in its management.
>
> ***Text from the FEIS (p. 7-3)***:
>
> **Community Benefit.** Tropic Land has pledged to establish a $1 million community benefits fund as part of its overall plan to develop Nānākuli Community Baseyard. The objective of the community fund is to enhance the welfare of the surrounding community through education and economic development. Administration of the fund will be determined in consultation with community leaders.

Where is the discussion about quantifying and qualifying the market and nonmarket cost for the loss of the traditional and unique significance of the open space environmental amentias [sic] associated with the Maui accounts and its values to the emerging visitor market in Ko Olina?

> ***Response 41***: Non-market values are discussed in *Section 5.8* on archaeological, historical, and cultural resources and in *Section 5.12* on visual resources.
>
> ***Text from the FEIS (p. 5-37)***:
>
> The Cultural Impact Assessment concluded that the project site does not have a direct or indirect adverse impact on culturally significant sites. Nor does it obstruct access to culturally significant sites. Effects stemming from the development of the project on Hawaiian culture would be minimal due to its geographic location and lack of surface water, burial sites, and commoner land claims. If Native Hawaiian activity occurred within the project area, it would not have been nearly as intensively utilized as coastal areas, well-watered areas, and forest zones.
>
> ***Text from the FEIS (p. 5-50)***:
>
> During scoping meetings with the community and in response to the EISPN, concerns were raised about the significance of the Waianae mountain range silhouette framing

Lualualei Valley; in particular, the mountainous silhouette of the demigod Maui. The area in question lies to the north and east of the project site, lying within the JBPHH Lualualei Annex. The Waiʻanae Sustainable Communities Plan (reference Open Space Map) also shows that area with a concentration of archaeological sites. The project site is outside the view plane to that area, and does not adversely impact any view of a silhouette of Maui.

Where is the discussion about the permissibility of a waste plant in an agricultural valley?

Response 42: Uses in the proposed light industrial park will be governed by the I-1, Limited Industrial zoning classification being sought by Tropic Land. A "waste plant" with significant environment impacts is not acceptable in the I-1 zone nor is it desired by Tropic Land.

Text from the FEIS (p. 6-25):

According to ROH Chapter 21, Land Use Ordinance, the purpose and intent of the City's I-1 limited industrial district:

> *"is to provide areas for some of the industrial employment and service needs of rural and suburban communities. It is intended to accommodate light manufacturing, including handcrafted goods as well as "high technology industries" such as telecommunications, computer parts manufacturing, and research and development. Uses in this district are limited to those which have few environmental impacts and those which complement the development scale of communities they would serve." (LUO, ROH Sec. 21-3.130)*

Where is the discussion about the "smart growth" and transit-oriented dependent development and its relevance to building our way out of congestion?

Response 43: "Smart growth" and transit-oriented development concepts are typically applied to residential projects. However, to the extent that smart growth encourages a more diverse mix and integration of land uses, and proximity between residences and workplaces to reduce commute distances, the proposed action is consistent with smart growth objectives.

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

One obstacle to job growth, particularly in the traditional industrial sectors (represented by the employment categories of Transportation, Industrial, and Construction) is the lack of available and affordable space. Existing industrial development on Oʻahu is overwhelmingly concentrated within three Development Plan Areas, namely the Primary Urban Center, ʻEwa, and Central Oʻahu. The combined inventory of industrial space within the remaining Development Plan Areas of East Honolulu, Koʻolaupoko,

> Ko‘olauloa, North Shore, and Wai‘anae totals less than 1.0 million square feet, or only 2.7 percent of the islandwide total. This means that a large proportion of Wai‘anae Coast residents work outside their communities requiring longer commutes, more time spent away from families, and the greater financial and environmental costs of increased fuel use.

Please document the history of farming in Nanakuli. In recent history, the parcel of land proposed for development was used to raise crops of all kinds. In fact, throughout Hawaii's history, Nanakuli was recognized as a famed agricultural community with lush farms that that helped to feed the people of Oahu. With proper planning, Nanakuli can manage its economic development to provide jobs while re-embracing its farming history.

Why is this industrial park proposed for a property at the back of a valley in the middle of a rural residential and agricultural community? Please confirm that most industrial parks are located along major access routes—like highways—and near supply hubs.

The two alternative uses discussed in this document are golf course and industrial park. Why was farming not analyzed? Please compare the potential environmental risks and benefits of farming on this parcel of land with the consequences of establishing an industrial park.

Does the change from Agricultural to Urban have lower environmental impact than traditional business ventures allowed on Agricultural lands?

> ***Response 44***: Alternatives to the proposed action are discussed in an expanded Chapter 4, including a discussion of the project area's agricultural history and potential. Interviews were conducted with three people who have first-hand knowledge of and/or experience with on-site farming activities. 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. 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***: See Response 36

What impact will the loss of this agricultural land have on Hawaii's effort to improve food security? Please conduct a study on how many acres of agricultural land are necessary to provide for all of Hawaii's food needs.

> ***Response 45***: See Response 36

What is the non-market value of the open space that would be lost if the industrial park were built?

Response 46: See Response 41

Produce a study to capture the observed historical economic development trends to forecast the vocational behavior of the individual households and firms in a construct consistent with economic theory to determine that the industrial park will create jobs accessory to the economic activities in the Waianae region?

Response 47: 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 Wage ($)**
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**

Concern for the Cultural Resources of the Area

Please document the extensive cultural history and traditional practices of the region affected by the Tropic Land proposal.

Would the proposed industrial park block access to the Nioiula Heiau? What will be the access path to the Heiau if the project is allowed?

Where is the stone that Maui sunned himself on? What impact would the proposed project have on this sacred pohaku?

Where is the cave that Maui used as a child? What affect would the proposed project have on this cultural significant site?

> ***Response 48***: Cultural resources are documented in the cultural impact assessment (JLK Management, LLC and Mother Earth Foundation, July 2009 in *Appendix G*). The stone that Maui sunned himself on and the cave that Maui used as a child are not within, nor in proximity to, the project area. The project site does not provide traditional access to Nioiula Heiau.
>
> ***Text from FEIS***: Refer to Appendix G

What will Tropic Land do to protect Ulehawa stream if the proposed project is allowed?

> ***Response 49***: A buffer area has been established around Ulehawa Stream which provides a setback for future development.
>
> ***Text from the FEIS (p. 5-14)***:
>
> Buildings will be set back from Ulehawa Stream through the reservation of a buffer area in the northwest corner of the project site.

What will Tropic Land do to preserve the many loʻi terraces documented in the area of the proposed project site?

> ***Response 50***: Based on a comprehensive archaeological study (Cultural Surveys Hawaii, January 1991 in *Appendix F*), there is no evidence of loʻi being located on the project site. The State Historic Preservation Division has concluded that the proposed action will not adversely impact significant historical resources.
>
> ***Text from the FEIS (p. 5-36)***:
>
> The Department of Land and Natural Resources, State Historic Preservation Division (SHPD) was consulted during the environmental review process for the earlier golf course proposal. At that time, the SHPD determined that the golf course project would have no adverse impact on significant historical resources (see correspondence from SHPD in Appendix H).

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

KAHEA

THE HAWAIIAN-ENVIRONMENTAL ALLIANCE

PROTECTING

NATIVE HAWAIIAN

CUSTOMARY &

TRADITIONAL RIGHTS

AND OUR FRAGILE

ENVIRONMENT

Office
1149 Bethel Street, Ste. 415
Honolulu, HI 96813

Mailing Address
P.O. Box 37368
Honolulu, HI 96837

toll-free phone/fax
888.528.6288

www.KAHEA.org
kahea-alliance@hawaii.rr.com

KAHEA: the Hawaiian-Environmental Alliance is a non-profit 501(c)3 working to protect the unique natural and cultural resources of the Hawaiian islands. KAHEA translates to english as "the call."

January 7, 2010

Mr. Glenn Kimura
1600 Kapiolani Boulevard, Suite 1610
Honolulu, HI 96814

Aloha Mr. Kimura,

Happy Holidays! Mahalo for providing this opportunity to comment on the Draft Environmental Impact Statement your company drafted for Tropic Land, LLC's proposed industrial park in Waiʻanae. Over the holidays, we reviewed this document, consulted with residents, kupuna, and cultural practitioners. We heard many concerns about this proposal – from poor wastewater management plans to health threats posed to nearby residents. We hope that you and Tropic Land, LLC will fully address these concerns before proceeding with any activities on this parcel. To aid this effort, we contribute the following comments.

I. Proposed Industrial Park Inconsistent with the Waiʻanae Community Sustainability Plan

The industrial park proposed by Tropic Land, LLC cannot be built – without violating the law – because it is inconsistent with the current Waiʻanae Community Sustainability Plan. This plan, developed by the residents, determines the general planning for the entire Waiʻanae Coast community. All decisions made about how land use designations are changed or implemented are determined by this plan, including boundary amendments by the Land Use Commission.

The parcel at issue in this DEIS, parcel 205A, is currently zoned for agricultural uses, like farming. It cannot be used for activities meant only for urban areas, such as industrial parks and landfills. The permits necessary to operate a legal industrial park require that the industrial park be located on properly zoned land.

While Tropic Land, LLC has petitioned for a "boundary amendment" to change the zoning for this parcel from agricultural to urban, the Land Use Commission cannot grant this request because the current Waiʻanae Community Sustainability Plan set parcel 205A aside for agricultural use only. Tropic Land, LLC should either find a more appropriate parcel for the proposed industrial park or find more suitable uses for parcel 205A.

II. Inadequate Cultural Impact Assessment

The 11-page Cultural Impact Assessment conducted for this proposed project does not adequately document the extensive and rich cultural history of Lualualei Valley. There are many moʻolelo and mele about the importance of the Waiʻanae Coast. The assessment included in this document, however, only briefly mentions the demigod Maui. In fact, Lualualei played a very important role in Maui's life. There are known cultural sites on and around the parcel at issue in this document that were not assessed. This serious oversight must be addressed before this document can be considered adequate.

III. Inadequate Alternative Analysis

The Hawaiʻi Environmental Policy Act requires that the project proponent consider alternatives when assessing the environmental and cultural consequences of a proposal. From our review of the DEIS, only two possibilities were considered: 1) a golf course, 2) an industrial park. The golf course alternative was immediately dismissed based on the previous landowner's failure establish a golf course. While it is wise to not repeat the mistakes of one's predecessors, that alone does not satisfy the legal requirements for a thorough analysis of alternatives to the preferred action.

Considering this parcel was used extensively for agricultural activities since ancient times to the 1980's, why was farming not considered as an alternative in the DEIS? Given the renaissance of farming in Hawaiʻi, agricultural sublots can provide the same economic benefits of an industrial park without the detrimental consequences.

A far more deliberative and useful analysis of alternative uses for parcel 205A must be conducted before this DEIS can be considered adequate.

We look forward to your responses to these questions and the many others that have been raised by the residents of Ulehawa and all of Waiʻanae.

Mahalo,

M. Townsend.

Marti Townsend
Program Director

KIMURA INTERNATIONAL INC.

April 26, 2010

Ms. Marti Townsend, Program Director
KAHEA
P.O. Box 37368
Honolulu, HI 96837

Dear Ms. Townsend:

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 comments.

Comments are numbered according to the items in your letter.

1. The industrial park proposed by Tropic Land, LLC cannot be built—without violating the law—because it is inconsistent with the current Waianae Community Sustainability Plan.

   Response: Tropic Land recognizes that the Waianae Sustainable Communities Plan (WSCP) must be amended to proceed with the project, and has submitted an application to the Honolulu Department of Planning and Permitting to amend the WSCP. DPP's Public Review Draft Amendments to the WSCP (2009) shows an industrial park as an optional land use for the site.

   Text from the FEIS (p. 6-16):

   The WSCP was in the process of being updated when this ~~DEIS~~ FEIS was prepared. As part of the WSCP update, Tropic Land submitted an application to amend language in the plan and change the Rural Community Boundary to include the proposed industrial park site. A public review draft of the updated WSCP has been released, but not yet adopted by City Council.

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

The following sections, based on Tropic Land's WSCP amendment application, describe the proposed project's consistency with various chapters of the WSCP (2000). Figures 26 and 27, which describe alternative proposed uses for the amendment area, are from the Draft WSCP (2009) released for public review. The land use map in Figure 26 is essentially unchanged from the 2000 WSCP. Figure 27 shows the industrial park as an option.

2. The 11-page Cultural Impact Assessment conducted for this proposed project does not adequately document the extensive and rich cultural history of Lualualei Valley.

Response: Determining the value of cultural significance is a subjective undertaking. There can be discrepancies between concrete evidence of historical use and mythology (*mo'olelo*). Based on Tropic Land's proposed design and use for the property, the authors of the Cultural Impact Assessment affirm their conclusion that the project will have no adverse effect on cultural resources. The State Historic Preservation Division has concluded that the proposed action will not adversely impact significant historical resources.

Text from the FEIS (p. 5-36):

The Department of Land and Natural Resources, State Historic Preservation Division (SHPD) was consulted during the environmental review process for the earlier golf course proposal. At that time, the SHPD determined that the golf course project would have no adverse impact on significant historical resources (see correspondence from SHPD in Appendix H). The project limits of the proposed industrial park are contained within the boundaries of the proposed golf course, and is not expected adversely affect historic resources.

3. Considering this parcel was used extensively for agricultural activities since ancient times to the 1980's, why was farming not considered as an alternative in the DEIS? A far more deliberative and useful analysis of alternative uses for parcel 205A must be conducted before this DEIS can be considered adequate.

Response: In an effort to investigate agricultural feasibility, 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, reflecting contemporary market and technological conditions. Over this time period, the site has 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. No crop was successful due to adverse

conditions. The Arakis tried a variety of intensive farming methods and diversified by herding goats and keeping beehives. 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 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

Letters with No Substantive Comments

Federal Agencies

- U.S. Army Corps of Engineers, Civil Works Branch

State Agencies

- Department of Accounting and General Services
- Department of Labor and Industrial Relations
- Division of Forestry and Wildlife

City Agencies

- Department of Design and Construction
- Design of Facility Maintenance
- Department of Parks and Recreation
- Police Department

Utility Companies

- Hawaiian Telcom

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

REPLY TO
ATTENTION OF: **CEPOH-EC-T**

December 2, 2009

RECEIVED DEC 02 2009

Civil Works Technical Branch

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

Dear Mr. Kimura:

Thank you for your letter dated November 20, 2009 regarding the Draft Environmental Impact Statement for the Nanakuli Community Baseyard Project, Lualualei, Oahu (TMK 8-7-9: 2). We do not have any additional comments to offer beyond those previously submitted on May 27, 2009.

Should you require additional information, please call Ms. Jessie Dobinchick of my staff at 438-8876.

Sincerely,

Steven H. Yamamoto, P.E.
Chief, Civil Works Technical Branch

LINDA LINGLE
GOVERNOR

RUSS K. SAITO
COMPTROLLER

SANDRA L. YAHIRO
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)1320.9

DEC - 8 2009

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

Dear Mr. Kimura:

Subject: Draft Environmental Impact Statement (DEIS)
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu
TMK: (1) 8-7-09:02 (portion)

Thank you for the opportunity to comment on this DEIS. The Department of Accounting and General Services' has no projects or facilities in this area, and we have no comments at this time.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Bruce Bennett of the Public Works Division at 586-0491.

Sincerely,

RUSS K. SAITO
State Comptroller

c: Ms. Katherine Kealoha, DOH-OEQC
Mr. Dan Davidson, Land Use Commission
Mr. Abbey Seth Meyer, Office of Planning

LINDA LINGLE
GOVERNOR

DARWIN L.D. CHING
DIRECTOR

COLLEEN Y. LaCLAIR
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS
830 PUNCHBOWL STREET, ROOM 321
HONOLULU, HAWAII 96813
www.hawaii.gov/labor
Phone: (808) 586-8842 / Fax: (808) 586-9099
Email: dlir.director@hawaii.gov

December 17, 2009

RECEIVED DEC 19 2009

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

Dear Mr. Kimura

In accordance with your request dated November 20, 2009, the Department of Labor and Industrial Relations has no comments or recommendation regarding the "draft environmental impact statement for the Nanakuli Community Baseyard".

Should you or staff have questions, please contact me 586-8844, or Mr. Patrick Fukuki, our Business Management Officer, at 586-8888.

Sincerely,

Darwin L.D. Ching

DARWIN L.D. CHING

LINDA LINGLE
GOVERNOR OF HAWAII

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

RECEIVED
LAND DIVISION
2009 NOV 31 P 1:33
DEPT. OF LAND & NATURAL RESOURCES STATE OF HAWAII

TO: **DLNR Agencies:**
x Div. of Aquatic Resources
__Div. of Boating & Ocean Recreation
x Engineering Division
x Div. of Forestry & Wildlife
__Div. of State Parks
x Commission on Water Resource Management
x Office of Conservation & Coastal Lands
__Land Division –

FROM: Morris M. Atta
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.
(X) We have no comments.
( ) Comments are attached.

Signed: Paul J. Conry
Date: 11/30/09

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

MUFI HANNEMANN
MAYOR

CRAIG I. NISHIMURA, P.E.
DIRECTOR

COLLINS D. LAM, P.E.
DEPUTY DIRECTOR

January 29, 2010

RECEIVED FEB 04 2010

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

Dear Mr. Kimura:

Subject: Draft Environmental Impact statement (DEIS)
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu
TMK: (1) 8-7- 09: 02 (por.)

Thank you for inviting us to review the above Draft Environmental Assessment. The Department of Design and Construction does not have any comments to offer at this time.

Should you have any questions, please contact me at 768-8480.

Very truly yours,

Craig I. Nishimura, P.E.
Director

CN:pg(342670)

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

MUFI HANNEMANN
MAYOR

JEOFFREY S. CUDIAMAT, P.E.
DIRECTOR AND CHIEF ENGINEER

GEORGE "KEOKI" MIYAMOTO
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 09-1178

December 30, 2009

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

Subject: Draft Environmental Impact Statement (DEIS)
Nanakuli Community Baseyard, Lualualei, Oahu, Hawaii
Tax Map Key: (1) 8-7-09: 02 (por.)

Thank you for the opportunity to review and comment on the DEIS dated November 2009 for the proposed Nanakuli Community Baseyard project.

We have no comments to offer as the proposed improvements will be located within privately-owned property and will have negligible impact on our facilities and operations. It is our understanding the proposed on-site project roadways, parking areas, drainage system, and other roadway improvements will be privately-owned and maintained and will not be dedicated to the City.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3697.

Sincerely,

for Jeoffrey S. Cudiamat, P.E.
Director and Chief Engineer

c: Land Use Commision
Office of Planning

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
1000 ULUOHIA STREET, SUITE 309 • KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3003 • FAX: (808) 768-3053 • CITY WEB SITE: www.honolulu.gov

MUFI HANNEMANN
MAYOR

LESTER K. C. CHANG
DIRECTOR

RICHARD HARU
DEPUTY DIRECTOR

November 27, 2009

RECEIVED DEC 03 2009

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

Dear Mr. Davidson:

Subject: Draft Environmental Impact Statement
Nanakuli Community Baseyard
Lualualei, Waianae District, Oahu

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the Nanakuli Community Baseyard.

The Department of Parks and Recreation has no comment as the proposed project will not impact any program or facility of the department. You may remove us as a consulted party to the balance of the EIS process.

Should you have any questions, please contact Mr. John Reid, Planner, at 768-3017.

Sincerely,

LESTER K. C. CHANG
Director

LKCC:jr
(342742)

cc: Mr. Glenn Kimura, Kimura International, Inc.
Mr. Abbey Seth Mayer, Office of Planning

POLICE DEPARTMENT

CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulupd.org

MUFI HANNEMANN
MAYOR

LOUIS M. KEALOHA
CHIEF

PAUL D. PUTZULU
KARL A. GODSEY
DEPUTY CHIEFS

OUR REFERENCE BS-DK

November 25, 2009

RECEIVED NOV 30 2009

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

Dear Mr. Davidson:

This is in response to a letter from Kimura International, Inc., requesting comments on a Draft Environmental Impact Statement for the Nānākuli Community Baseyard project.

The Honolulu Police Department has no comments to offer at this time.

If there are any questions, please call Mr. Brandon Stone of the Executive Bureau at 529-3644.

Sincerely,

LOUIS M. KEALOHA
Chief of Police

By
DEBORA A. TANDAL
Assistant Chief of Police
Support Services Bureau

cc: Mr. Glenn T. Kimura
Kimura International, Inc.

Mr. Abbey Seth Mayer
Department of Business, Economic
Development, and Tourism

Hawaiian Telcom

December 3, 2009

RECEIVED DEC 05 2009

Land Use Commission
235 S. Beretania Street, Room 406
Honolulu, HI 96813
Attention: Mr. Dan Davidson, Executive Officer

Dear Mr. Davidson:

Subject: **Nanakuli Community Base Yard**
Draft Environmental Impact Statement

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

Hawaiian Telcom does not have any comments to offer at this time. Please continue to include us during the design stages of the project.

If you have any questions or require assistance in the future on this project, please call Les Loo at 546-7761.

Sincerely,

Lynette Yoshida
Senior Manager - OSP Engineering
Network Engineering & Planning

cc: G. Kimura - Kimura International, Inc.
A. S. Mayer - Office of Planning
File [Nanakuli]

5 EISPN Comments and Responses

(Replacing material in Appendix M of the FEIS)

Comments on the EISPN/EA

Agency	Date	Comments	Relevant Section in the DEIS
FEDERAL AGENCIES			
U.S. Army Corps of Engineers, Civil Works Branch	Letter dtd 5-27-09	Concurrence with flood hazard determination in EISPN (p. 3-8)	Sec. 4.4
U.S. Army Corps of Engineers, Regulatory Branch	Letter dtd 6-26-09	Identify all streams and wetlands Describe all ground-disturbing activities on the project site	Sec. 4.3; 4.5 Sec. 4.1
STATE AGENCIES			
Department of Agriculture	Letter dtd 6-25-09	Recommend consulting with Harry Choy, Director of the West Oahu County Farm Bureau (Ph. 676-9100)	Phone conversation with Mr. Choy on October 16, 2009
Dept of Health	Letter dtd 6-16-09	<u>Wastewater Branch</u> Project is located in the Critical Wastewater Disposal Area—no new cesspools allowed. Property is located in both the Pass and No Pass Zones. Disposal of wastewater in the No Pass Zone is restricted. No objections to the private WWTP. Highly recommend that effluent disposal system be located in the Pass Zone area of property On-site WWTP should not be used to treat industrial wastewater Encouraged to use recycled wastewater Wastewater plans to meet HAR Chapter 11-62 <u>Clean Water Branch</u> 1. Any project impacts to State waters must comply with antidegradation policy, designated uses, and water quality criteria	 Sec. 4.15.3 Sec. 4.15.2; 4.15.3 Sec. 4.15.2 Sec. 4.15.3 Sec. 4.3

Agency	Date	Comments	Relevant Section in the DEIS
Dept of Health (continued)		2. NPDES permit needed. 3. Wastewater discharges not covered by NPDES general permit may require an individual permit 4. Copy of NPDES permit application also must be submitted to DLNR and SHPD 5. Discharges must comply with water quality standards	Sec. 1.6 Sec. 1.6
DLNR, Commission on Water Resource Management	Memo dtd 6-17-09	Recommend coordination with County to incorporate project into Water Use and Development Plan Recommend coordination with Dept of Agriculture to incorporate reclassification into the Agricultural Water Use and Development Plan Recommend use of water efficient fixtures and practices Recommend use of BMPs for storm water management Recommend use of alternative water sources where practical Review by DOH needed to determine requirements to protect water quality * CWRM has records for three wells on TMK site, but there are discrepancies in pump testing levels between their records (200, 65, 100 gpm) and level (225 gpm) indicated in EISPN. * Drawdown in one well was below sea level and is expected to salt up, making it unsuitable for irrigation	Sec. 4.3 Sec. 4.15.3; 6.3 Sec. 4.2
DLNR, Engineering Division	Memo dtd 6-15-09	Confirmation that project site is in FIRM Zone D. There are no regulations for development in Zone D.	Sec. 4.4
DLNR, Division of Aquatic Resources	Memo dtd 6-12-09	There have been no DAR stream surveys on Ulehawa Stream Details on the drainage improvements—locations and routes, capacity of detention ponds, detention period for water, and water quality issues need to be addressed in the DEIS to determine impacts on aquatic resource values in the area	Sec. 4.3

Agency	Date	Comments	Relevant Section in the DEIS
DLNR, Division of Forestry & Wildlife	Memo dtd 5-27-09	No objections	Sec. 4.5; 4.6
Dept. of Transportation	Memo dtd 6-17-09	1. Traffic Impact Analysis Report (TIAR) needed to assess project-generated impacts to Farrington Hwy and intersections. TIAR should evaluate alternative access routes (Hakimo, Lualualei Naval Access). TIAR should address how vehicles would be prevented from using Lualualei Naval Access Rd if restricted by Navy 2. TIAR to address full build-out conditions with mitigation recommendations. 3. Construction plans required for work in State highway ROW.	Sec. 4.9 Sec. 4.9
Office of Hawaiian Affairs	Letter dtd 6-19-2009	Agree that golf course is not best and highest use of property, but concerns about using "limited agricultural lands for other purposes than agriculture and probable impacts to cultural and environmental resources" Comply with Sec 6E-46.6, HRS regarding inadvertent finds of significant cultural deposits or human skeletal remains Landscape with drought-tolerant native or indigenous species for erosion control, shade, and aesthetics	Sec. 4.7; 4.8 Sec. 4.8 Sec. 6.3
Office of Planning	Letter dtd 7-1-09	1. Water: discuss water requirements, potable and non-potable water sources, measures to reduce water demand and promote water reuse. Identify whether project is within a designated Water Management Area, impact of the project on sustainable yield of affected aquifers, impact of project on projected water use and system improvements in County's water use and development plan. 2. Ag Lands: discuss how loss of ag lands is justified 3. Public Health: quantify volume of solid waste likely to be generated and impact on County's existing and planned capacity for managing solid waste. Mitigation measures to	Sec. 4.15.1; 4.15.3 Sec. 4.7 Sec. 4.15.4; 6.3

Agency	Date	Comments	Relevant Section in the DEIS
Office of Planning (continued)		reduce solid waste generation. If project will have a potential to generate hazardous materials. Identify any contamination from past or present use of the site, including findings from Phase 1 or 2 ESAs.	
		4. Cultural Resources: include archaeological inventory, status of any monitoring or preservation plans, describe cultural resources and practices on project site and ahupua'a in which the property is located, discuss impact of project on any cultural resources and practices.	Sec. 4.8
		5. Environmental, Recreation and Scenic Resources: include updated flora and fauna inventory, including "rare" species and ecosystems, describe recreational uses on or near project site, describe scenic resources and impacts to them.	Sec. 4.5; 4.6
		6. Coastal Zone Management: discuss how storm water and wastewater generated by the project will be prevented from reducing the quality of nearshore waters. Describe hazard conditions and mitigation measures.	Sec. 4.3; 4.15.2
		7. Energy Use: quantify projected energy requirements by type of use and discuss measures to reduce energy demand, promote energy efficiency, promote use of alternative, renewable energy sources. Recommends use of LEED rating system and sustainable design. Identify generating or transmission capacity constraints. Discuss promotion of transportation energy savings.	Sec. 4.15.5; 6.3
		8. Impact on State Facilities: discuss impacts on State facilities, including highways, roads, harbors, and airports.	Sec. 4.9
		9. Access: provide detailed information regarding easement agreements with Navy for use of Lualualei Naval Access Roads and any restrictions, responsibilities, or liabilities this will create for Tropic Land or future project tenants.	Sec. 4.9
		10. Conformance with County Plan Designations and Growth Boundaries: discuss consistency with County land use plans, including alternative site considered, impacts on surrounding	Sec. 5.7

Agency	Date	Comments	Relevant Section in the DEIS
Office of Planning (continued)		lands, significant public benefit, existing unilateral agreement (which conditions have been met and which have not). 11. Development Timetable: provide a schedule of development for each phase of the total development and provide a map showing location and timing of each increment of development.	Sec. 3.3
CITY AND COUNTY AGENCIES			
Board of Water Supply	Letter dtd 7-2-09	The existing water system cannot provide adequate fire protection for the project. To provide adequate fire flow, a new 16-inch water main is needed from the intersection of Paʻakea and Hakimo Roads. The new water line will eliminate the need for the 1.0 MG reservoir on site. All water mains should be located in the public right-of-way. A non-potable water system should be installed. Proposed development should be master-metered	Sec. 3.3; 4.15.1 Sec. 3.3; 4.15.3
Honolulu Dept of Design and Construction	Letter dtd 6-9-09	No comments at this time	
Honolulu Dept of Facility Maintenance	Letter dtd 6-22-09	No comments; improvements on private property will have negligible impact on DFM facilities and operations Understand that on-site roads, parking, drainage system, storm water detention basins and other roadway improvements will be privately owned and maintained and not dedicated to City	
Honolulu Dept of Planning and Permitting	Letter dtd 7-2-09	1. What is current status of plans for Lualualei Naval facility? 2. List all possible permits needed in Sec 1.7 3. Check location of 100-foot buffer. Should be described as "northwesterly" not "southwesterly" 4. Natural Hazards section should include rockfall and fire hazards. EIS should include rockfall, erosion, and slide studies.	Sec. 1.6 Sec. 4.4

Agency	Date	Comments	Relevant Section in the DEIS
Honolulu Dept of Planning and Permitting (continued)		5. Mention that a private refuse collection service will be used.	Sec. 4.15.4
		6. Chapter 4, "federal" should be dropped if federal plans not discussed.	
		7. Because project is in a rural area, drop "Economic Activity, Objective G" and "Physical Development and Urban Design, Objective D" from discussion of General Plan policies. Mention that part of the site is classified as Prime Ag Lands under Economic Activity Objective C.	Sec. 5.7
		8. Delete statement that the site is close to the freeway since Kalaeloa interchange is 8 miles away.	
		9. Show Waianae SCP land use policies more clearly in Fig. 13	Fig. 23 and 24
		10. Under Significance Criteria, discuss:	
		• Permanent loss of Prime ag land	Sec. 4.7
		• Urbanization will alter natural environment	Sec. 4
		• Potential noise, air quality, and industrial hazard impacts that might adversely affect public health	Sec. 4.11; 4.10
		• Rock and fire hazards make this an environmentally sensitive area	Sec. 4.4
		• Project may substantially increase electrical consumption in this area even if solar power is used. Separate energy impact from potential reduction in gasoline use due to reduced commuter travel.	Sec. 4.15.5; 6.3
		11. Under Hydrological Conditions locate and discuss the no-pass line and the UIC line and any impacts on groundwater resources	Sec. 4.15.3
		12. Under Surface Water show location of the stream and discussion how project will accommodate stream flow, protect stream from industrial run-off and protect the project from flooding. Discuss drainage improvements and project's "Storm Water Quality Plan"	Sec. 4.3

Agency	Date	Comments	Relevant Section in the DEIS
Honolulu Dept of Planning and Permitting (continued)		13. Under Circulation and Traffic, discuss steps and approvals needed to provide access to the industrial park. 14. Under Water, identify the location of the 1.0 mgd water storage facilities and transmission lines needed. Discuss (a) how much of the 8-inch transmission line is available to meet the anticipated water demand and (b) the anticipated non-potable water demand and system. 15. Under Wastewater System, discuss anticipated wastewater flows and potential impacts of wastewater treatment. 16. Under Waianae SCP, indicate the project's location outside the Rural Community Boundary and why the project (as urban development) should be located in an agricultural area.	Sec. 4.9 Sec. 3.1; 4.15.2 Sec. 4.15.2 Sec. 5.7
Honolulu Dept of Transportation Services	Letter dtd 6-16-09	TIAR should include impacts on area roads, such as Hakimo Rd. DTS requests copy of the TIAR for review and comment.	Sec. 4.9
Honolulu Fire Dept	Letter dtd 6-17-09	1. Provide fire access road for every facility or building when any part of an exterior wall is located more than 150 ft from a fire access road 2. Provide water supply capable of supplying required fire flow for fire protection to all premises on which a facility or building will be constructed. Provide fire hydrants and mains if any part of the facility or building is more than 150 feet from a water supply on a fire access road. 3. Submit civil drawings to HFD for review and approval	Sec. 3.1; 4.15.1 Sec. 4.15.1
Honolulu Police Dept	Letter dtd 6-2-09	No significant impacts on the facilities or operations of HPD	Sec. 4.16.1
UTILITIES			
Hawaiian Electric Co.	Letter dtd 7-9-09	HECO has existing 11.5kV overhead facilities along Lualualei Naval Access Road. Request that development plans show all affected HECO facilities and address any conflicts. Continue	Sec. 4.15.5

Agency	Date	Comments	Relevant Section in the DEIS
		consultations.	
Hawaiian Telcom	Letter dtd 5-26-09	No comments at this time Continue coordination during design stage	Sec. 4.15.5
BUSINESS AND COMMUNITY ORGANIZATIONS			
Nānākuli/Māʻili Neighborhood Board	Letter dtd 6-23-09	Neighborhood Board has supported the proposed industrial park project through resolution supported by eight members present. Absent member submitted letter of support. Board will monitor and support project as it progresses through permit and EIS process. Resolution and attached exhibit embodies cooperative effort between Board members and project developers. Community is aware of significant cultural resources in project area, but confident that local cultural monitors will be able to address any project impact. Attachments: Resolution supporting the development and concept of the proposed Nānākuli Community Baseyard project, a light-industrial park in Lualualei Valley, Nānākuli, Oʻahu, adopted by the Nānākuli/Māʻili Neighborhood Board at its meeting held on July 15, 2008, with Exhibit "A" Unilateral Agreement and Promise by Tropic Land LLC to the Community along the Leeward Coast Letter dated July 21, 2008 from Kahu Victor Allen Kila in support of Tropic Land LLC proposed Light Industrial Project	Sec. 8.1; Appendix I Sec. 4.8
Concerned Elders of Waiʻanae	Letter dtd 6-22-09	<u>Cultural Resources</u> Bulldozing hillsides will irreparably undermine one of the most important viewplaces (viewplanes?) on the Waianae Coast. Maui, central figure in Native Hawaiian cosmology, said to be born on the hillsides of Lualualei.	Sec. 4.8; 4.12

Agency	Date	Comments	Relevant Section in the DEIS
Concerned Elders of Waiʻanae (continued)		Document extensive cultural history and traditional practices of the region affected by the project	Sec. 4.8
		Will the industrial park block access to the Nioiula Heiau? What access path to the heiau will be allowed?	Sec. 4.8
		Where is the stone that Maui sunned himself on? What impact to this sacred pohaku?	Sec. 4.8
		Where is the cave Maui used as a child? What effect will the project have on this cultural site?	Sec. 4.8
		What will be done to protect Ulehawa Stream?	Sec. 4.3
		What will be done to preserve the loi terraces documented in the area of the project site?	Sec. 4.8
		<u>Endangered Species</u>	
		What is the state of the endangered nehe? …	Sec. 4.5
		What impact will construction on the site have on the ecology downhill? This area was set aside as sacred, which may indicate that disturbing the soil here might have detrimental consequences on the land and ocean below it.	Sec. 4.5
		<u>Air Pollution</u>	
		Concerns about the increase to annual average for particulate, sulfur dioxide, daily maximum 1-hour values recorded for ozone and carbon monoxide, especially because air quality along Farrington Hwy and Lualualei Naval Road is already impacted by heavy vehicle emission of diesel particulates	Sec. 4.10
		If project proceeds, air quality monitoring station must be established and quarterly air quality reports released to the public.	Sec. 4.10
		Assess impacts to residents, especially children and elderly, from exposure to truck emission/exhaust	
		<u>Wastewater</u>	
		Cumulative impact of greater lot coverage threatens erosion of	Sec.4.3

Agency	Date	Comments	Relevant Section in the DEIS
Concerned Elders of Waiʻanae (continued)		natural stream banks…resulting in flood conditions	
		Is the proposed on-site WWTP in keeping with urban city-like characterization?	Sec. 3.1; 4.15.2
		Storm water runoff will negatively impact surrounding properties. What is the storm water management plan? Will it provide percolation into landscaped areas? Will there be dry wells to ensure no increase in runoff from the previous land use?	Sec. 4.3
		What is the general drainage pattern of the project site? Where is the nearest storm drain connection? What are your plans for the municipal storm drain facility?	Sec. 4.3
		Will the project be allowed to increase surface runoff onto adjoining properties? Where will surface waters be directed?	Sec. 4.3
		Is the sanitary system adequate to meet the needs of activities for the Urban District?	Sec. 3.1; 4.15.2
		Will pre-treatment be required for the plant's wastewater before it enters the public wastewater system?	Sec. 4.15.2
		Retention/detention basins should be established to contain runoff	Sec. 4.3
		Collection/separation systems should be constructed to collect and separate contaminants from runoff.	Sec. 4.3
		<u>Ground and Soil</u>	
		Are there plans to remove soil?	Sec. 4.1
		What are the plans for altering the topography?	Sec. 4.1
		How many acres are planned for soil disturbance?	Sec. 4.1
		Development on unstable soils could be hazardous.	Sec. 4.1; 4.4
		Conduct soil study. Soils on this property are not suitable for safely constructing warehouses.	Sec. 4.1
		<u>Quality of Life in Nanakuli</u>	
		Noxious, commercial activities on properties abutting	

Agency	Date	Comments	Relevant Section in the DEIS
Concerned Elders of Waiʻanae (continued)		Lualualei Naval Road have compromised QOL for residents along Farrington Hwy and Hakimo Rd	Sec. 4.14
		Adding "urban-like" use next to working farms and residential communities without reducing, eliminating, or preventing serious public health issues is immoral. Changing district boundary from agricultural to urban will further compromise public health for citizens of the Lualualei ahupuaʻa.	Sec. 4.14; 5.3; 5.7
		<u>Noise</u>	
		Project will increase noise due to large volumes of traffic and heavy vehicles that will use Hakimo Rd, the primary access to the project.	Sec. 4.11
		What are the project's hours of operation?	
		<u>Water Supply</u>	
		How will building be served if there are no existing laterals?	Sec. 3.1; 4.15.1
		Are existing water lines for agricultural lots of sufficient size to serve urban needs?	Sec. 3.1; 4.15.1
		If water of sub-standard quality is used for irrigation, food safety is a concern for downstream farm lands.	Sec. 4.2
		Will there be an automated irrigation system? Will treated wastewater be used to irrigate?	Sec. 4.15.1
		Is the water supply adequate to meet fire requirements?	Sec. 4.15.1
		Will raw water for industrial use be drawn from on-site wells?	Sec. 4.2
		Are there specific funded plans for expansion of the water supply to the project site?	Sec. 3.1; 4.15.1
		What type of wastewater treatment technology will be employed?	Sec. 4.15.2
		What becomes of the sludge collected from the WWTP?	Sec. 4.15.2
		<u>Traffic Congestion</u>	
		The existing roadway is nonstandard. Access to the project site is via an existing "non-city-like" road. More discussion	Sec. 4.9

Agency	Date	Comments	Relevant Section in the DEIS
Concerned Elders of Wai‘anae (continued)		with Hakimo residents is warranted regarding roadway improvements.	Sec. 4.9
		Use of Hakimo Road access will inevitably increase	
		Existing Hakimo Rd and intersection with Farrington Hwy is not adequate to serve the project which will result in increased traffic flow through the residential community at Princess Kahanu Estates.	Sec. 4.9
		“We’re not building our way out of congestion with this TL proposal.”	Sec. 4.9
		Is the project site served adequately by access roads? Are additional access roads planned?	Sec. 3.1; 4.9
		Is traffic congestion a problem on the access road to the project? On State highways? In supplier areas? In market areas?	Sec. 4.9
		What are the road limits?	Sec. 4.9
		Complete a traffic study for the anticipated increased traffic on H-1, Farrington Hwy, Hakimo Rd, and any other access ways.	Sec. 4.9
		<u>Sense of Community</u>	
		Project site does not offer easy access to existing industrial centers or transportation. If the project proposes to link to regional businesses, which ones?	Sec. 2; 5.5; 5.7
		What is the demand to locating in a region far from centers of commerce and with traffic access challenges? Proposed land use is not appropriate to State and City transportation policies and development plans?	Sec. 2
		Does our State General Plan and regional development plan support urban development and industrial commercial growth moving to rural Waianae? Is there a plan in effect or proposed?	Sec. 5.1; 5.2; 5.7
		Prepare a study to capture observed historical economic trends to forecast the vocational behavior of the individual	Sec. 2; 4.13