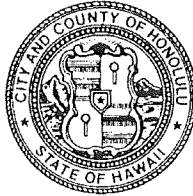


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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DIRECTOR

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DEPUTY DIRECTOR

2010/ELOG-2815(MH)

March 2, 2011

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

Dear Mr. Davidson:

Subject: DR 10-42 Petition for Declaratory Order to Designate
Important Agricultural Lands

2011 MAR -8 A 8 23
LAND USE COMMISSION
STATE OF HAWAII

The Department of Planning and Permitting of the City and County of Honolulu has the following comments regarding Castle & Cooke Homes Hawaii, Inc.'s request to designate approximately 902.066 acres at Waialua, Wahiawa, and Waikele, Oahu, Hawaii as Important Agricultural Lands (IAL).

1. Section f. of the petition, pages 9 and 10, should include additional language to clarify that the proposed designations of IAL are outside of the Urban Community Boundary.
2. What other lands under the State Agricultural District does the Petitioner have?
3. Why is the Petitioner offering the Whitmore property when there is no current water allocation for this property? Although the Whitmore property is adjacent to the Whitmore Village municipal water system which would require the Board of Water Supply approval, how much will it cost to develop an operational irrigation system that is needed to support agricultural uses on this property? Is this cost reasonable for farming?
4. If approved, is the Petitioner going to subdivide the IAL portions of existing lots if only a portion of the lots are being designated as IAL?
5. What are the adjacent and future planned uses around the proposed designated sites?
6. Why is there a break between Dole Plantation (6-4-004:007) and Whitmore (7-1-002: por. 032)? In addition, why is there a break between 7-1-002: por. 032? The Petition is silent regarding the separation of these designations.
7. Although water availability is described for each designated area, there should be more discussion. The range of crops that could be sustained with the given supply should be included.

Mr. Orlando Davidson, Executive Officer
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8. More discussion is needed to define "critical land mass." Is 200 acres a minimum?
9. The proposed designated sites may be near infrastructure, but what are the conditions of the supporting infrastructure?
10. Native traditional crops include more than taro and ti leaf. The Petition was not clear on how much each property contained of either crop. It may also be useful to know how long these crops have been grown there.
11. Regarding Table 1 of Exhibit A, why is column 4 blank?
12. Why is "Growing conditions" only defined by LSB and solar radiation? Other factors such as rainfall, wind pattern, use of fertilizers and pesticides/herbicides, site elevation, etc. should also be considered.

Should you have any questions, please contact Matt Higashida of our staff at 768-8045.

Very truly yours,



David K. Tanoue, Director
Department of Planning and Permitting

DKT:js

cc: Dawn Takeuchi Apuna, Department of the Corporation Counsel

DR 10 42 Petition