



# University of Hawaii at Manoa

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February 11, 1986

RG:0064

Mr. Donald A. Clegg  
Department of General Planning  
650 South King Street, 8th Floor  
Honolulu, Hawaii 96813

Dear Mr. Clegg:

General Plan Amendment  
Secondary Urban Center  
Ewa Beach/Central Oahu

We have reviewed the application for proposed amendments to the City and County of Honolulu general plan which if effected would expand the designated secondary growth area to include the Ewa Central Oahu area; and to delete the West Beach/Makakilo area from further urban designation.

Our review was prepared with the assistance of Paul Ekern, Agronomy & Soil; Luciano Minerbi, Urban and Regional Planning; Bion Griffin, Anthropology; and Martha Diaz, Environmental Center.

According to the position paper accompanying the proposed amendments to the general plan (Attachment B), the primary purpose of the proposed land use designation is to facilitate housing development for low and moderate-income households. In reviewing the background data provided, we find that the housing issue was the major thrust of the "new" General Plan in 1977. Housing continued to be the focus in the 1982 General Plan review but the secondary urban center was actually reduced in size to reflect the lowered estimates of population growth. In contrast, the present amendments reflect an apparent increase in the overall size of the area to be designated as a secondary urban center and in particular the addition of Central Oahu to that area.

## General Comments

The specific general plan issue is whether the proposed designation of Ewa and Central Oahu as a "secondary growth area" will facilitate the development of low and moderate income housing. Our primary concerns regarding these proposed amendments relate to the long-term socioeconomic/environmental needs of the county and state that will be affected by the permanent commitment (loss) of prime agricultural lands and the resulting commitments for infrastructure needs such as highways and water resources.

The rationale presented for the proposed amendments appears to stem largely from requests by developers and landowners in the Central Oahu area (Basis for Amendment, p. 4) rather than an objective evaluation of the optimum needs of the county. How will the establishment of the secondary urban center be effected? What provisions for coordination with the Hawaii State Plan, functional plans, and the various development plans for housing, transportation, agriculture and energy be addressed? Since urbanization of prime agricultural land represents a loss of a non-renewable resource any such changes should only be undertaken after a comprehensive analysis of the long term needs of the county and the state.

### Transportation

Page 2, Policy 2, Objective A. What is meant by "limited highway access?" Does this mean limited access highways or that highway improvements will be limited? Given that the transportation corridors presently are inadequate to serve demand during commuter hours, how will the increased demands from growth be mitigated? What alternative transportation measures are being considered.

### Housing

The application states (p. 4) that persistent housing shortage is a major concern of the City and County of Honolulu and that the land owners and developers have expressed interest in working with the City to address this problem. The need for low and moderate housing is cited as a major justification for the proposed amendments, yet the area to be redesignated will presumably encompass an area far in excess of that required for this housing group. The rationale for the redesignation of the land, in excess of that to be used for low and moderate housing, should be provided.

### Archaeology

The large area of land that will be affected by the proposed amendments has numerous areas of archaeological significance, therefore, the need to plan early for either mitigation, salvage or preservation is warranted.

### Water Needs

The discussion of the proposed amendments indicates that water needs for the central Oahu area will be met by corresponding reductions in water demand by the sugar industry. It should be recognized that the brackish water used in drip irrigation will not flush salts, therefore some mechanism will have to be developed to establish a leaching fraction and method for flushing salts. The reports of contamination of water wells raises the issue of pesticide transport. Have sufficient data been accumulated to demonstrate that the pesticide transport toward the water table has peaked and that the potable wells will not continue to gain in their content of possible carcinogens? Furthermore, it is our understanding that the high silica content of the Schofield potable high water table may limit the long term use of this water source for domestic purposes. One final note on the water issue, the rationale presented indicates that the Ewa and Waikele area appear to yield higher economic returns for the pineapple and sugar industries. This is predicated on the use of Waiahole Ditch water to dilute the higher salt concentrations on the Ewa-Waipahu plain. What is the status of the Waiahole Ditch system in relation to the proposed change in land use designation.

Mr. Donald A. Clegg

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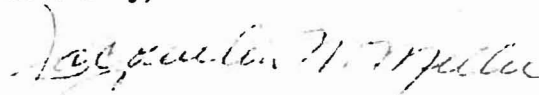
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Conclusion

The decision as to whether the proposed designation of Ewa/Central Oahu will contribute to the establishment of the secondary urban center and relieve the immediate housing shortage must be based on a fully comprehensive and objective evaluation of the cumulative social and environmental ramifications. We urge that issues identified in this review be considered in relation to decision making on this important land use change.

We appreciate the opportunity to provide our comments on these proposed amendments.

Your truly,

  
Jacquelin N. Miller  
Acting Associate Director

cc: OEQC  
Patrick Takahashi  
Luciano Minerbi  
Bion Griffin  
Paul Ekern  
Martha Diaz