May 29, 1990
RG:0100

Mr. Donald A. Clegg, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Clegg:

Zone Change Application
Kahuku Industrial Park
Kahuku, Oahu

The above cited application is for a planned Intensive Industrial District on 14.9 acres of land in Kahuku. The Environmental Center has conducted a brief review of this extensive application with the assistance of Frank Scott, Agricultural and Resource Economics; and Carolyn D. Cook, Environmental Center.

An Environmental Assessment/Negative Declaration for this project was processed by the Department of General Planning in October 1986. The information provided in this Zone Change Application is similar to that of an Environmental Assessment, yet all of the elements are not included. For example, the Botanical Survey and the Avifaunal and Feral Mammal Survey both recommend a buffer of shoreline brush on the ditch that passes through the NW corner of the site, but under "Mitigative Measures" (p. 7) no mention is made of protection of the Ditch and its endangered species by establishing this buffer zone. If this document is intended to provide information for public review as an EIS does, then all of the necessary elements should be included in the document. Because the 1986 Environmental Assessment/Negative Declaration was not readily available, we did not use it in our review. We would like to be assured that somewhere in the permit process for this project provisions are made for the protection of endangered species and their habitat in the ditch on the land proposed for industrial development.

The environmental impacts of the loss of agricultural land, should have been surveyed and results discussed. The Botanical Survey indicates that more than one-half of the proposed site is presently being used for growing
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various vegetable crops. Who will be displaced? Where will they go? What will the socio-economic impacts be on the community?

Thank you for the opportunity to comment on this document.

Yours truly,

John T. Harrison  
Environmental Coordinator  

cc: OEQC  
L. Stephen Lau  
Frank Scott  
Carolyn D. Cook