April 15, 1994
RG:0114

Mr. Robin Foster
Planning Department
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Foster:

Annual Amendment Review
1994 Development Plan for Oahu

The 1994 Development Plan (DP) Annual Amendment Review includes various proposed amendments to the DP Land Use Maps currently being considered by the Planning Department.

We have reviewed the Development Plan with the assistance of Paul Ekern, Agronomy and Soil Sciences; and Heather Keevill of the Environmental Center.

In general, the information included in the Annual Development Plan Amendment Review is minimal, and therefore, it is difficult to properly evaluate the environmental impacts associated with the proposed amendments. Given the lack of information, we have raised issues as well as some questions that may be relevant to individual amendments. Having stated the limitations, our review will proceed by exploring each case identified by the alphanumeric code in the amendment review.

94/EH-1 Koko Crater

The City Council has proposed a zoning change for 15 acres of land in Kalama Valley from industrial to preservation. Arguments supporting the requested zoning change are first, that industrial use would be incompatible with adjacent residential communities, and second, that any industrial use would obstruct the view plain. There is no mention in
the proposal of the owners (Bishop Estate) reaction to this request. Would Bishop Estate be financially compensated for the down graded use, or some kind of a land swap be worked out? Also, does the waste water treatment facility have plans for expansion? If so, is appropriately zoned adjacent land available?

94/PUC-1: Sand Island Park Project

No comment.

94/PUC-2: Ala Wai Gateway

Requested amendments include the redesignation of 8.8 acres in the Ala Wai Gateway area from Resort and Commercial Mixed Use to High Density Apartment. Since the area is already developed, it is unclear what this request is meant to accomplish. Have the impacts of this change on the planned Convention Center been explored?

Any future development plans for the area should consider the views discussed by Elbasani and Achimore in the March 22, 1994, Advertiser article. The article suggests a need to build on the tropical island environment and expand public open spaces in the Waikiki area. We concur with the articles conclusion which states that "existing open space is not effectively utilized, and is probably insufficient in quantity for the density of development." New development plans in the Waikiki area should incorporate these ideas into their planning process.

94/PUC-3: Waimalu Commercial Industrial

This amendment appears to simply bring zoning in line with the reality of current land use, therefore, we offer no comment.

94/CO-2: Waiawa by Gentry

This amendment proposes a zoning change from low to medium density residential and agriculture to public facility. While we do not question the assumed decline in agriculture, the rational for the change from low density housing to medium density housing is not so obvious. With all of the new housing development that has been built and is planned, and in light of the announced Barbers Point closing, is it necessary to focus on additional high density residential development?
Another question regards the availability of water resources. Since sugarcane on Oahu is quite likely to go out of production over the next few years, it is conceivable that water from Waiahole ditch used for cane could be used to support urban development. Transferring water use from agriculture to urban use could create bigger long term problems. Water for agriculture is utilized to nourish the crop, but also has the effect of continually recharging groundwater. Urban development on the other hand tends to result in significantly increased impervious surfaces. Not only would the recharge from agriculture be lost to urban sewage systems, but rain waters would also be diverted by the surface structures and therefore not be available to recharge groundwater. These two forces combined should be considered in any plans for further development.

94/CO-3-5, 94/E-1&2:

See above discussion regarding water resources.

Thank you for the opportunity to review these documents.

Sincerely,

John T. Harrison
Environmental Coordinator

cc: OEQC
Roger Fujioka
Paul Ekern
Heather Keevill