

**STATE OF HAWAI‘I
DEPARTMENT OF LAND AND NATURAL RESOURCES
OFFICE OF CONSERVATION AND COASTAL LANDS
Honolulu, Hawai‘i**

October 23, 2020

**Board of Land and
Natural Resources
State of Hawai‘i
Honolulu, Hawai‘i**

REGARDING: Proposed Rule Amendment OA 19-01
Request to Amend the Hawai‘i Administrative Rules (HAR) Title 13, Chapter 5 to Re-designate Land that Lies Within the Conservation District Hawai‘i Loa Special Subzone to the Health and Wellness Special Subzone

**PETITIONER/
LANDOWNER:** Castle Medical Center, dba Adventist Health Castle

LOCATION: Ka‘eleuli, Kāne‘ohe, Ko‘olau Poko, O‘ahu

TAX MAP KEY: (1) 4-5-035:010

AREA OF PARCEL: 132.455 acres

SUBZONE: Hawai‘i Loa College Special

DESCRIPTION OF AREA/CURRENT USE (EXHIBITS A & B)

The site exists in the ili of Ka‘eleuli, Kāne‘ohe ahupua‘a, district of Ko‘olau Poko, on the moku of O‘ahu. The property is off Kamehameha Highway, between Kalaniana‘ole Highway and Interstate H-3 near Castle Junction and is known as the Hawaii Loa campus. Hawai‘i Pacific University (HPU) continues to utilize the college campus.

Existing structures on site include an academic center, student housing, cafetorium, maintenance facilities, athletic fields, and parking. While the property is currently owned by Castle Medical Center, it is being leased back to HPU for continued educational use until 2021, subject to a one-year option to extend.

Existing Land Use Classifications (EXHIBIT C)

The property lies within the State Land Use Conservation District, Hawai‘i Loa College Special Subzone. Pursuant to Hawai‘i Administrative Rules (HAR) §13-5-15, the objective of the Special subzone is to provide for sustainable use of areas possessing unique developmental qualities that complement the natural resources of the area.

The Board of Land and Natural Resources approved a request to utilize the site for a liberal arts college on August 12, 1966. The Hawai'i Loa College Special subzone was the first Special subzones created in 1968 and was designated for educational purposes.

Geographic Characteristics

General Topography, geologic conditions, and slope: According to the 2013 USGS topographical map, the elevation of the property ranges from 280 feet to 640 feet above mean sea level. The property consists of a modestly sloped valley positioned in a southeast to northwest orientation along the western slope of Ulumawao Peak on the Ko'olau mountain range.

The property's upper elevations along the eastern boundary slope down at an approximately 30% grade to the existing HPU campus. Between the existing academic center and Kamehameha Highway on the property's western border, the slope is more moderate at approximately 10%.

As the property is located within the State Land Use Conservation District, it is not eligible to be designated as Important Agricultural Land. In addition, neither the Hawaii Land Evaluation and Site Assessment System (LESA) nor the Agricultural Lands of Importance to the State of Hawaii (ALISH) identifies this property as Agricultural Lands of Importance.

Climatic Characteristics

The Windward region is perpendicular to the prevailing flow of trade winds which generally blow from the northeast at speeds of five to 15 miles per hour. The lowland, windward areas are cloudy, and moderately rainy with frequent trade-wind showers. The mean annual rainfall at the project site is 63.75 inches. August is typically the driest month with approximately 2.85 inches, and November the wettest month with 7.76 inches.

Hydrological Characteristics

Groundwater: The property lies within the Ko'olau Poko Aquifer unit, which is a section of the Windward Hydrological Unit. The aquifer is characterized as predominately high-level ground water. The 2008 sustainable yield estimate for the Ko'olau Poko Aquifer Unit was 30 million gallons per day.

Surface Water: Evidence of an intermittent stream begins at a point roughly opposite the maintenance area at the north end of the site. This stream is a tributary to Kamao'oali'i Stream, which in turn is a tributary to Kāne'ohē Stream and flows to Ho'omaluhia Reservoir. In addition, over the years, man-made ditches have been developed and maintained to convey ephemeral flows on the site.

The applicant notes that a Jurisdictional Waters Survey was prepared by AECOS Inc. in September 2018. The survey found that no wetlands were present on the property. In addition, the survey discovered that while the 1998 USGS topographical map shows a blue line stream originating within the soccer field area, this stream does not actually exist. Rather, the "stream" is actually a collection of ditches used to convey ephemeral flows.

Drainage Pattern: The property receives stormwater runoff from both on-site and off-site drainage areas. A drainage swale, located roughly parallel to Kamehameha Highway, captures runoff from

the highway and areas mauka, including the Pali Golf Course and the hillside above the campus. Runoff is transported as either sheet flow across lawns or is captured by man-made culverts and ditches of various sizes, and then routed along an existing grassed swale through the athletic fields. The current calculated runoff under the 100-year, 1-hour storm event for the campus is 1,075 cubic feet per second.

Biological Characteristics

Flora: The HPU campus is landscaped with mature trees, ornamental shrubs, plants, and maintained grass. A few areas of unmanaged forest, dominated by non-native species, are scattered across the site, most notably a broad swath alongside Kamehameha Highway on the property's western boundary. Trees in this swath include the umbrella tree (*Shefflera actinophylla*), java plum (*Syzigium cumini*), fiddlewood (*Citharexylum caudatum*), and macarenga (*Macaranga tanarius*). Additional non-native shrubs and forbs are interspersed in these forest areas. Wedelia (*Sphagneticola trilobata*) and laua'e fern (*Phymatosorus grossus*) are locally abundant, non-native groundcovers.

Fauna: Findings from on-site surveys of avian and mammalian species are in keeping with the low-elevation location and non-native vegetation present on-site. Eighteen bird species, all considered to be alien to Hawai'i, were recorded. One indigenous species, the migratory shorebird Pacific Golden-Plover (*Pluvialis fulva*), was recorded. Evidence of feral pigs (*Sus scrofa*) was seen in numerous locations. Other non-native mammals (mice, rats, cats, mongoose) undoubtedly use resources within the property on a periodic basis. All of these species are deleterious to native ecosystems and native species.

Historic Properties

In 2009, Cultural Surveys Hawai'i, Inc. prepared an Archaeological Assessment as a part of the HPU Master Plan that was approved by the Board of Land and Natural Resources via Conservation District Use Permit (CDUP) OA-3548. The archaeological assessment did not identify any historic properties in the area and concluded that the many land modifications and grading of the property over the years likely destroyed or severely impacted any surface historic properties that might have existed. In response to this report, the State Historic Preservation (SHPD) issued a letter dated September 29, 2010 which stated that while their records indicated there were no historic properties within the property and that a 2009 Archaeological Inventory Survey for the property resulted in negative results, SHPD recommended that the project should have a qualified archaeological monitor on call. In addition, they requested that an Archaeological Monitoring Plan be prepared for review and acceptance by SHPD prior to the commencement of ground disturbing activities.

Staff notes that it appears that an Archeological Monitoring Plan was never prepared as HPU did not pursue the 2009 Master Plan. Therefore, as this current action involves no ground disturbing activities, it is anticipated that when Castle Medical Center decides to move forward with their proposal for the property, they will be required comply with Hawai'i Revised Statutes (HRS), Chapter 6E and any conditions that SHPD may have at that time.

Scenic or Visual Resources

Currently, the existing HPU Hawai'i Loa campus is visible along a stretch of Kamehameha Highway on either side of the entry driveway. Paved-surface parking lots parallel the property's eastern boundary. Views beyond the entry show the existing campus centered around the Academic Center building. A grassed soccer field and baseball diamond are also visible from Kamehameha Highway. The remaining view across open areas is the steeply sloped, undeveloped hillside covered with non-native scrub plants and trees. Along the northwest boundary of the property an unmanaged forest of non-native trees completely screens the campus from view.

Infrastructure Evaluation

Roads and Access: Access to the property is via a single entrance from Kamehameha Highway on the southwestern boarder of the property.

Domestic Water: Water service is provided by an existing Board of Water Supply 12-inch water main located within the north-bound lane of Kamehameha Highway. Lateral lines are connected to the water main to provide domestic water service to the campus, irrigation lines for landscaping, and fire-protection services to fire hydrants and sprinkler systems.

Wastewater: All on-site wastewater gravity flows to an on-site pump station which transfers the wastewater through an existing 10-inch force main to the City and County of Honolulu Halekou Sewage Pump Station.

Stormwater Runoff/Drainage: The property receives stormwater runoff from both on-site and off-site drainage areas. A drainage swale, roughly parallel to Kamehameha Highway at the western edge of the campus, carries stormwater runoff to the north. There are also four (4) existing pipe-culverts that route stormwater near the existing tennis courts. All stormwater runoff generated from the campus is carried toward Ho'omaluhia Botanical Garden, located to the north of the subject property.

Recreational Facilities: The HPU campus includes a baseball diamond, tennis courts, and a soccer field.

Electrical and communication Infrastructure: Existing overhead Hawaiian Electric Company power lines extend along the southern boundary of Kamehameha Highway near the property. These lines run parallel to the property's driveway and connect to an existing Hawaiian Electric transformer located on campus which provides electrical service to the entire campus.

Hawaiian Telcom and Spectrum provide telecommunications services to the property via overhead lines along the driveway from Kamehameha Highway.

Crown Castle AS LLC manages the Academic Building's rooftop telecommunication sites pursuant to an agreement that was executed in 2014. The term of the agreement is 40 years, expiring in 2054 unless further extended by mutual agreement. There are currently three leases for facilities which include antennas along the ventilation room exterior walls and equipment located within the ventilation room. The services being provided include land-mobile voice and data services for subscribers.

PROPOSED ACTION OF THE PETITIONER

The petitioner originally filed a request to re-designate the property into the General subzone. However, upon further consultation with OCCL staff, they have opted to petition the Board for a new Special Subzone.

Review of Property Characteristics in Relation to the Proposed Subzone Objectives

The petitioner believes the objectives relevant to the Hawaii Loa College Special Subzone are not applicable to the property as the Special subzone was created specifically for educational purposes and are hereby requesting a change in the name of the subzone to a Health and Wellness Special Subzone.

A new medical facility is envisioned to be substantially located within an already developed area of the existing campus. Staff notes however, at this time no improvements or secondary improvements are being proposed with this proposed subzone boundary amendment.

STAFF ANALYSIS

Pursuant to HAR, §13-5-5, any change to Conservation District subzone boundaries must be made by amending HAR, Chapter 13-5. Statutes and rules that govern the process in which amendments to HAR, Chapter 13-5, may be made include:

Hawaii Revised Statutes (HRS) §91-2 through §91-7;

HRS, Chapter 201M, Hawaii Small Business Regulatory Flexibility Act;

HRS, §183C-4(f);

HAR, Chapter 13-1, Subchapter 3; and

HAR, §13-5-16.

Petitions to amend the administrative rules are reviewed by the Legislative Reference Bureau and the Department of the Attorney General. In general, in order to take effect, proposed rule amendments must obtain departmental and gubernatorial authorizations for both the public hearing and final approval.

Authorization for Public Hearing:

The first major step to amend the administrative rules is to hold a public hearing. Approval from the Board of Land and Natural Resources to hold a public hearing was granted on June 28, 2019. Confirmation of authorization was received from the Governor's Office on June 16, 2020.

Public Hearing

The Public Hearing regarding this rule amendment was held on August 19, 2020 at the Kalanimoku Breezeway. 10 persons were in attendance.

Adventist Health Castle noted it has been at the current location for 57 years. AHC is committed to continuing to serve the windward community. The existing facility is getting outdated and needs to be reinvigorated. Written testimony submitted discusses the appropriateness of the site near a major highway and with public transportation available; the 'Institutional Use' designation under the Ko'olau Poko Sustainable Communities Plan; the re-purposing of the site for which proposed development was previously approved; and maintaining a low visual impact. **(Exhibit D)**

Consultant Group 70 recognizes the need to keep the site very natural. From Kamehameha Hwy, the site is buffered by a 150-ft band of vegetation. Written testimony submitted discusses adherence to the County's Ko'olaupoko's Sustainable Communities Plan; noted that the Final Environmental Impact Statement for the Adventist Health Castle Master Plan for the site was published on September 23, 2019; and proposed visual impact mitigation for the site. **(Exhibit E)**

A member of the public noted that he is retired and a resident of Kualoa. He recalls his Father raising funds for the existing Castle Hospital and noted that his neighbors, family and former co-workers use the facility too. The next closest Hospital near his neighborhood is in Kahuku. He noted there is no critical care facility in Kāne'ohe.

Representative Chris Lee supports the amendment and stated that AHC is a trusted community partner. The community has requested that the footprint and a sense of place be retained along with access to services.

Additional Written Testimony

The Harold K.L. Castle Foundation supports AHC's request for subzone re-designation. Harold K.L. Castle originally donated the site for educational use initially by Hawaii Loa College. The Foundation has been impressed with the design and considerations made for the proposed new facility. **(Exhibit F)**

The Hawai'i 1000 Friends opposes the re-designation. Would like the Board to consider the conservation attributes of the site. It's open space and view plains, allow streams to run unrestrained once again providing habitat for endangered species such as damselflies and more trees to provide habitat for the endangered Pueo and Hawaiian Hoary Bat, which are known to occur in or near the area and so migratory seabird can migrate mauka to makai without being impeded by light pollution.

"The nearby Hawaiian Memorial Park Cemetery is seeking a boundary amendment from Conservation to Urban for about 54-acres. While each these changes from a conservation focus to urban use may not individually seem like much in reality it is death by a thousand cuts by incrementally urbanizing areas that contain habitat, foraging and propagation land for Hawaii's endangered and finite native flora and fauna." **Staff notes:** The Boundary Amendment has been approved by the Land Use Commission and will be finalized this month.

"The application does not meet HAR, §13-5-14 because the urban type development is not premature but is planned and eminent."

"If the Board decides that urbanization and not conservation is the best use of this valley then we urge the Board to require the applicant to seek a boundary amendment to the urban district for the project area shown on the Master Plan map so that the urban uses match the land use designation." **(Exhibit G)**

Approval/Disapproval:

Should the Board approve this petition, the proposed rule change will be forwarded to the Governor for approval. Upon receiving the Board's approval, both the Legislative Reference Bureau and the Department of the Attorney General would review the proposed rule amendment. With the Department of the Attorney General's approval "as to form", the proposed rule amendment shall then be forwarded to the Governor for the final decision.

State Policies and Procedures:

Staff has processed the petition in accordance to the Governors' Administrative Directive #18-02 to guide policy and procedures for the adoption, amendment or repeal of administrative rules. The Governor directs that petitions for administrative rule changes address certain policy topic areas.

HRS, Chapter 201M, Hawaii Small Business Regulatory Flexibility Act:

Staff consulted with the Small Business Regulatory Review Board (SBRRB) via a letter dated April 18, 2019. Via an e-mail dated April 24, 2019 from Ms. Je t'aime Alcos (SBRRB Office Assistant), Mr. Tony Borge, Chair of the SBRRB, had determined that the rule amendment would not need to be placed on an SBRRB meeting agenda as there is no ascertainable small business impact. Therefore, no "Small Business Statement" is required.

Chapter 343, HRS, Requirements:

The Adventist Health Castle Master Plan-Hawai'i Loa Campus Final Environmental Impact Statement was published in the October 8, 2019 edition of the Office of Environmental Quality Control's bi-monthly publication, *The Environmental Notice*.

DISCUSSION

It is the petitioner's intent to use the property for new medical facilities which would not be an identified land use that could be applied for under the current subzone designation. AHC originally requested to have the property re-designated to the General Subzone. However, in evaluating the merits of the General subzone, the objectives of the General subzone were not consistent with the existing site.

Staff has been to the Hawai'i Loa campus and has passed by the site on many occasions. The site has been previously developed with existing infrastructure such as a road network, City sewerage connection, water and electrical services. The site sustains a college campus. The City and County's guiding plan for the region, the *Ko'olau Poko Sustainable Communities Plan*, provides that new facilities such as those envisioned by AHC should be located within the Community Growth Boundary or within areas which it designates as being for institutional use such as this site.

The objective of the Special subzone is to provide for sustainable use of areas possessing unique developmental qualities that complement the natural resources of the area. Upon further discussion with staff, AHC would like to have the property re-designated to a Special Subzone for Health and Wellness for health, research and educational purposes.

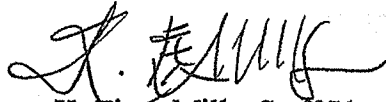
Public testimony and comments received support AHC's petition for a subzone change and future proposal the project with the exception of Hawai'i's 1000 Friends.

RECOMMENDATION

Based on the preceding analysis, Staff recommends the Board of Land and Natural Resources:

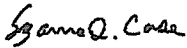
1. Grant petitioner, Castle Medical Center, dba Adventist Health Castle, request to amend Chapter 13-5, Hawaii Administrative Rules to re-designate their property that lies within the Conservation District Hawai'i Loa College Special subzone;
2. Re-designate property that lies within the Conservation District as illustrated and outlined in blue on **Exhibit B** known as TMK: (1) 4-5-035:010 located at Ka'eleuli, Kāne'ohe, Ko'olau Poko, O'ahu into a Health and Wellness Special Subzone; and
3. Authorize the forwarding of the rule amendment to the Governor, State of Hawai'i for approval and enactment.

Respectfully submitted,



K. Tiger Mills, Staff Planner
Office of Conservation and Coastal Lands

Approved for submittal:



SUZANNE D. CASE., Chairperson
Board of Land and Natural Resources

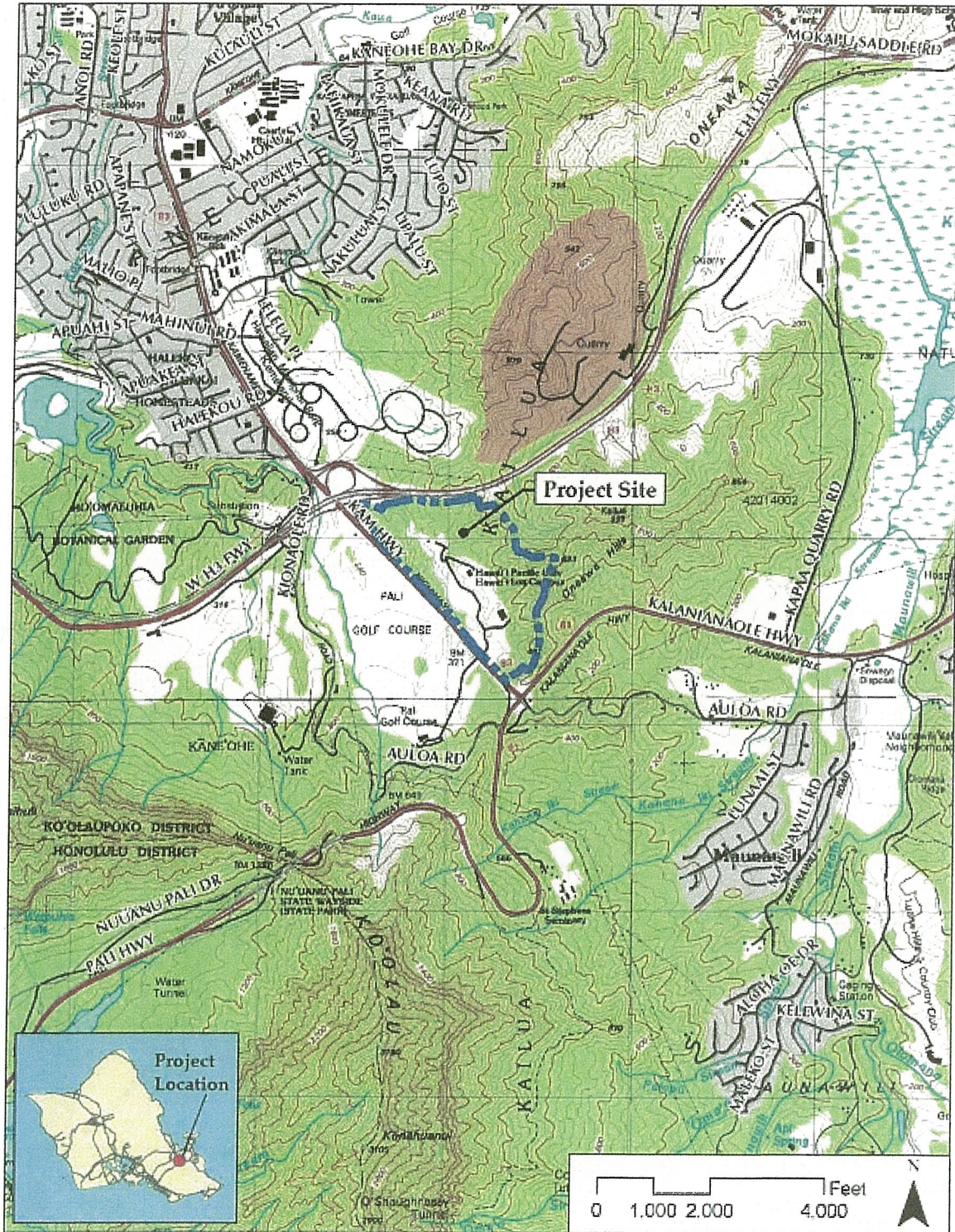


EXHIBIT A

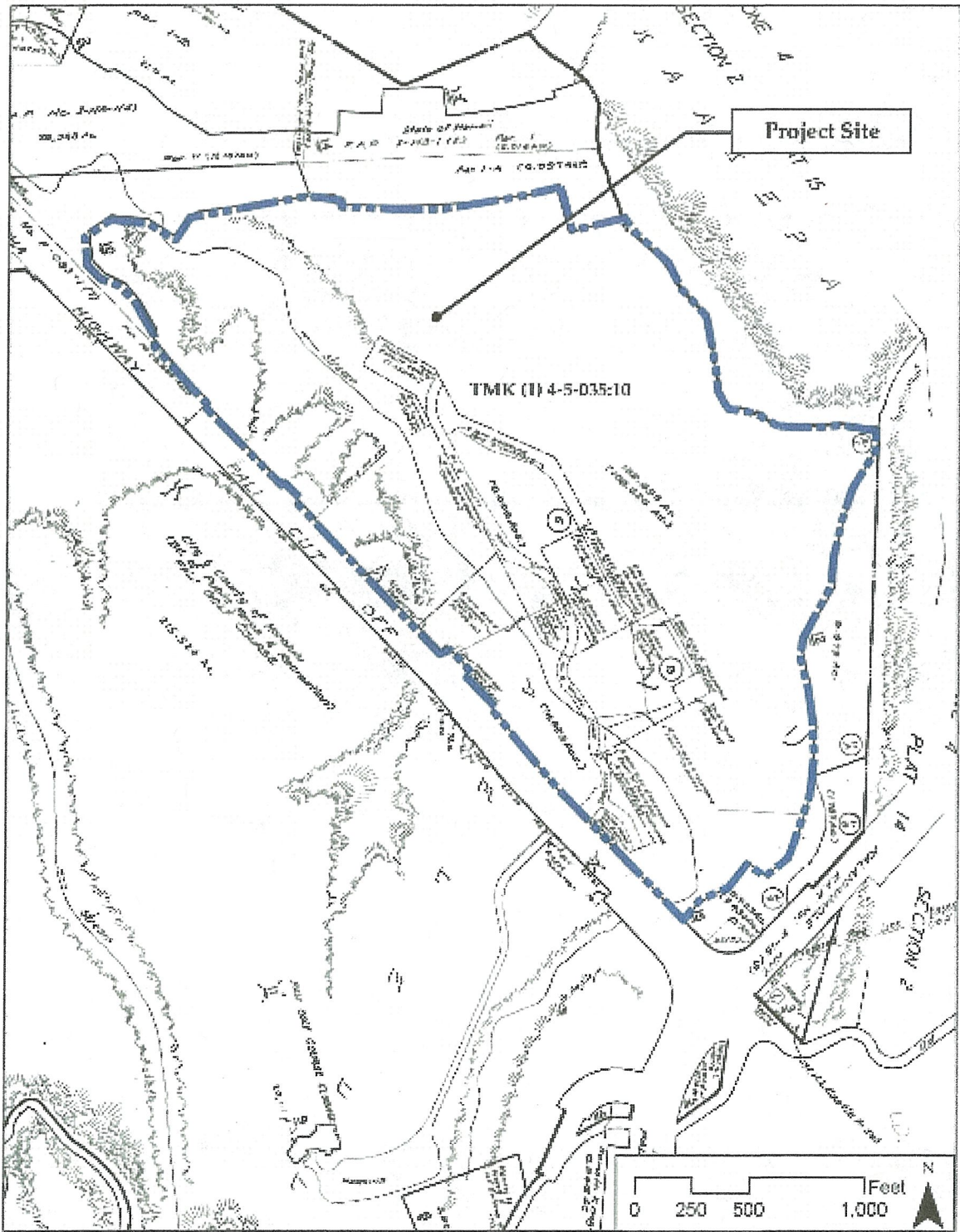
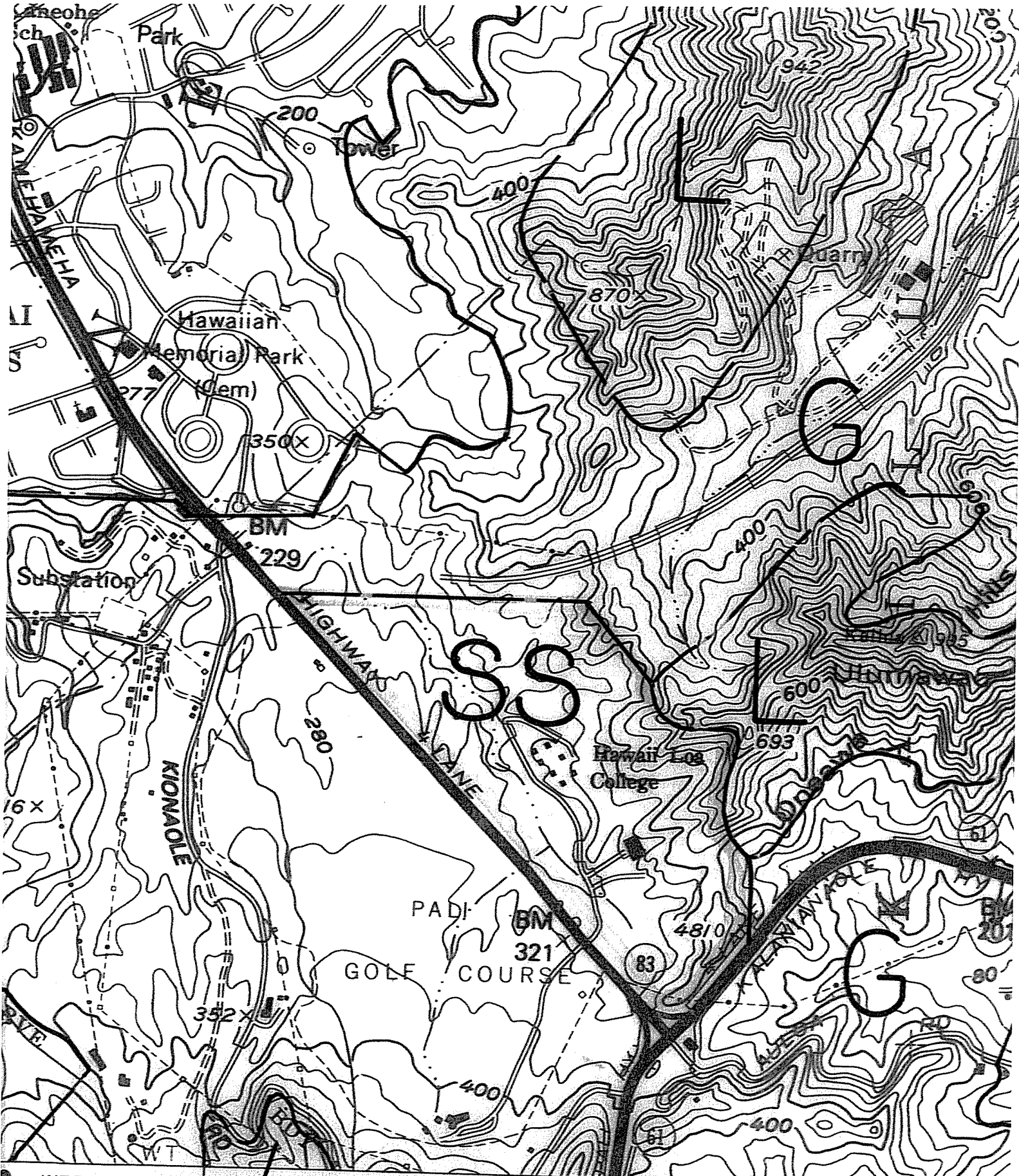


EXHIBIT B



INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1983

HONOLULU (P.O.) 8 MI.

157°

R EXHIBIT C

ROAD CLASSIFICATION

Testimony of Kathy Rae Thal

Adventist
Health
Castle, CEO

Outline of Presentation for Public Hearing
Application to Rezone Existing Subzone

August 19, 2020, 5:30 p.m.
1151 Punchbowl Street
Kalanimoku Building Makai Breezeway
Honolulu, Hawaii

I. Need for Rezoning

The HPU campus is in the Conservation District - Hawaii Loa College Special Subzone - and is designated for educational purposes.

Adventist Health Castle is petitioning the Board of Land and Natural Resources to rezone the property as General Subzone, the first step in allowing Castle to use the property for its new medical center. Castle will still need to seek a Conservation District Use Permit before it can actually develop the property as a medical campus.

II. Need for New Medical Campus

The existing Castle Medical Center was opened in 1963 to serve the medical needs of Windward Oahu.

Castle Medical Center has been highly rated by national organizations and has received numerous national awards. For example, it received an "A" ranking from the Leapfrog Group, designating it among the safest hospitals in the United States. It was also recognized as one of the 100 Best Hospitals for Patient Experience, Patient Safety, and Obstetrics.

However, despite these honors, the existing hospital campus is becoming outdated. Its infrastructure is inefficient, and we do not believe Castle is positioned to effectively service the Windward and North Shore communities over the long term.

In the coming years, the residents of these communities will need a conveniently located, modern medical center with high quality inpatient facilities, expanded emergency department and other outpatient services, and a state of the art cancer treatment center. The HPU campus is ideal for accommodating these new facilities, and is by far the best alternative available in Castle's service area.

III. Appropriateness of Site

The new medical facilities we envision will be built on the HPU campus would require approximately 30 acres. These facilities need to be near a major highway for emergency access and for patients and employees using TheBus.

The HPU campus meets the size requirements, is easily accessible to the public because of its proximity to Interstate H-3, Kamehameha Highway, and Pali Highway, is on currently

EXHIBIT D

existing bus routes, and is designated for “institutional use” under the *Ko‘olau Poko Sustainable Communities Plan*.

We were fortunate to find a property with an already developed area that is more or less large enough to contain the planned medical campus. This will allow Castle to re-purpose the footprint of the current HPU campus, without having to significantly expand into the remaining 100-acre undeveloped area adjoining the campus.

IV. Previously Approved New Development

In 2011 and 2012, the BLNR approved substantial new development of the HPU campus, estimated to cost approximately \$125 million. The approved development included:

- Two four story residential buildings;
- a Student Center with a book store, rentals and retail area, gym, meeting rooms, and administrative and student support space;
- an Academic Center with a library, data center, classrooms, research labs, graduate suites, and courtyard;
- a 600-seat Performing Arts Center;
- a Multi-Purpose Gymnasium;
- additional parking for 400 vehicles;
- and much more.

After obtaining BLNR approval of this new construction, HPU later chose to consolidate its college campus in downtown Honolulu, and so did not move forward with the approved development.

We feel it is important to keep in mind that, although Castle intends to use the property for different purposes than HPU’s educational uses, additional development of the campus has already been considered and approved.

V. Minimal Visual Impact

We are (as is everyone) concerned about preserving the beauty of the Hawaii Loa area. This is why we plan for the new medical facilities to have a minimal visual impact.

Among other things, Castle plans to:

- Develop the medical campus within the general footprint of the existing HPU campus;

[Show exhibit or provide handouts comparing the existing HPU footprint to the anticipated footprint of the medical campus after construction – Exhibit B.4 from Application]

- Leave the hillside behind the campus and the surrounding area in their current undeveloped state;
- To the extent practicable, retain the existing trees and replant any on-site which must be moved;
- Renovate the existing HPU Academic Center for use as a cancer center, rather than build something new from scratch;
- Limit the height of new medical office buildings to the height of the existing Academic Center; and
- Minimize the views of new buildings, similar to the northern section of the campus as viewed from Kamehameha Highway.

[Show exhibit or provide handouts comparing the existing view of the HPU campus from the Pali Lookout to the anticipated the Pali Lookout view after construction – Exhibit B.12 from Application]

Thank you for this opportunity. These new facilities will enable Castle to provide much needed, first-rate medical services to the Windward and North Shore communities in the years to come.

**Adventist Health Castle Master Plan
Public Hearing August 19, 2020
TESTIMONY/PROJECT INTRODUCTION**

Presented by: Barrie Morgan, Environmental Planner, G70

Moving the medical center to an existing campus allows for adaptation of the site, which is being vacated by a college and is needed to serve community health needs in the 21st Century. The AHC Master Plan design adheres to the City and County of Honolulu *Ko'olau Poko Sustainable Communities Plan* policy of respecting the scenic context and open space character through maintaining the current campus roofline as the highest point. KPSCP also designates this site as appropriate for institutional use.

The project will utilize areas already graded and used for new buildings and will expand the naturalized vegetation screen at the site's entry with additional landscaping.

Final EIS was published September 23, 2019

Surveys were conducted for the AHC Master Plan EIS and determined the site contains:

- Predominantly non-native vegetation and introduced mammals (e.g., mice, rats, cats, mongoose) dominate the site (SOURCE: EIS Chapter 3, Section 3.3).
 - Native trees such as koa (*Acacia koa*), 'ōhi'a (*Metrosideros polymorpha*) and milo (*Thespesia populnea*), along with coconut palms, will be included to enhance landscaping. Indigenous and endemic shrubs will be incorporated. No invasive plant species will be introduced.
- No native species of significance are known from the site, and no native-dominated ecosystems persist (SOURCE: EIS Chapter 3, Section 3.3).
 - A search was conducted for aquatic species habitat as part of the assessment of surface waters on site; only non-native species were identified
 - Habitat for endangered Hawaiian damselfly species were not found on the AHC parcel.
- Intermittent surface waters

NOTE: a field study was consigned to research the site's surface waters. Using recognized reports such as Hawaii Stream Assessment, the survey verified are no named stream tributaries within the developed campus. Drainage swales to carry intermittent storm water from north of Kam Highway across the campus. At the north end of the parcel where a man-made or enhanced ditch/stream begins near the maintenance facility, physical indicators of a bed and banks were noted, which may indicate an intermittent stream segment. This is out of the Master Plan campus area.

- The State Office of Conservation and Coastal Lands concluded that there is sufficient supportive documentation that historic properties are not anticipated to be present in the AHC Master Plan project area as no surface historic properties have been identified (SOURCE: Appendix D of the FEIS).

EXHIBIT E

To minimize visual impacts, the project will:

- Extend and deepen the existing landscaped buffer along Kamehameha Highway to visually narrow the campus views from the existing entrance
- Remove and replace the existing surface parking lots along the highway and revegetate with a naturalized planting scheme approximately 40-feet deep to further screen the site from the highway
- mature trees will be retained and moved within the new landscaping to the extent practicable
- Exterior lighting will be shielded to target light where needed and limit “light trespass.”



HAROLD K.L. CASTLE
FOUNDATION

August 24, 2020

*Closing the achievement
and preparation gaps
in public education*

*Restoring nearshore
marine ecosystems*

*Strengthening Windward
Oahu communities*

Samuel Lemmo, Administrator
Office of Conservation and Coastal Lands
sam.j.lemmo@hawaii.gov

Kimberly (Tiger) Mills, Planner
Office of Conservation and Coastal Lands
kimberly.mills@hawaii.gov

Re-designation of TMK (1) 4-5-035:010 in Kane`ohe from
Hawai`i Loa College Special Subzone to the General Subzone

Dear Mr. Lemmo and Ms. Mills,

I am writing on behalf of the Harold K.L. Castle Foundation to express strong support for Adventist Health Castle's request to rezone its recently acquired property adjacent to the intersections of Kamehameha and Kalaniana'ole Highways in Kaneohe as a General Subzone. It is my understanding that this rezoning will pave the way for Adventist Health Castle to proceed with its plans to build its new medical center to meet the increasing needs of the Windward Oahu community.

As you may know, Mr. Harold K.L. Castle originally donated these lands for educational uses, initially by Hawaii Loa College and subsequently by Hawaii Pacific University. The Harold K.L. Castle Foundation worked closely with Adventist Health Castle to expand the reversion clause on the deed to allow both educational and health care uses of the property, since both uses benefit the community significantly.

We have been impressed with the care with which Adventist Health Castle and its architects have worked to design its use of the new property in such a way as to minimize environmental impact, address traffic concerns, keep intact many existing design features of the built area of the property, and develop a much-needed new facility to improve the health and wellness of the growing (and aging) communities of Windward Oahu and beyond.

Please do not hesitate to contact me if you have any questions. Thank you for the opportunity to testify in support of Adventist Health Castle's rezoning request.

Sincerely,

Terrence R. George
President & Chief Executive Officer
tgeorge@castlefoundation.org
cell: 808-561-9709
office: 808-263-7071

EXHIBIT F

1197 Au'loa Road
Kailua, Hawai'i
96734

tel 808-263-7073
fax 808-261-6918

www.castlefoundation.org



Hawaii's Thousand Friends

335 Hahani St. #335132 * Kailua, HI 96734 * Phone/Fax (808) 262-0682 E-Mail: htff3000@gmail.com

August 19, 2020

Samuel Lemmo
Administrator
Office of Conservation and Coastal Lands
sam.j.lemmo@hawaii.gov

Kimberly (Tiger) Mills
Office of Conservation and Coastal Lands
Kimberly.mills@hawaii.gov

Re-designation of TMK (1) 4-5-035:010 in Kane`ohe from
Hawai`i Loa College Special Subzone to the General subzone-

Hawaii's Thousand Friends opposes the re-designation of the Hawai`i Loa Special Subzone to the General Subzone for the reasons explained below.

As trustees of Hawaii's public trust resources the Department and Board are required to uphold the laws, policies and rules that protect our states finite and fragile cultural and natural resources.

Hawaii State Constitution ARTICLE XI *CONSERVATION, CONTROL AND DEVELOPMENT OF RESOURCES* Section 1 *For the benefit of present and future generations, the State and its political subdivisions shall conserve and protect Hawaii's natural beauty and all natural resources, and shall promote the development and utilization of these resources in a manner consistent with their conservation....*

HRS §344-3 Environmental policy. It shall be the policy of the State, through its programs, authorities, and resources to:

(1) Conserve the natural resources, so that land, water, mineral, visual, air and other natural resources are protected by controlling pollution, by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics in a manner which will foster and promote the general welfare, create and maintain conditions under which humanity and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of the people of Hawaii

EXHIBIT G

Conservation District HRS §183C-1 Findings and purpose. The legislature finds that lands within the state land use conservation district contain important natural resources essential to the preservation of the State's fragile natural ecosystems and the sustainability of the State's water supply. It is therefore, the intent of the legislature to conserve, protect, and preserve the important natural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety and welfare

Hawai'i Pacific University vacating this 149-acre conservation designated land provides the Board with the opportunity to consider the conservation attributes of the site. It's open space and view plains, allowing streams to run unrestrained once again providing habitat for endangered species such as damselflies, more trees to provide habitat for the endangered pueo and Hawaiian hoary bat, which are known to occur in or near the area and migratory seabirds can migrate mauka to makai without being impeded by light pollution.

The Jurisdictional Waters Survey map, attached, shows an unnamed stream going from the mauka Pali Golf Course through the property and converging with Kamo'oali'i Stream at the Kaneohe end of the property and ending at the Kailua end of the property. This stream could provide habitat for the endangered Blackline Hawaiian Damselfly and other endangered stream species marked in red.

Just a mile from this site Hawaiian Memorial Park Cemetery is seeking a boundary amendment from Conservation to Urban for approximately 53.449-acres. While each of these changes from a conservation focus to urban use may not individually seem like much in reality it is death by a thousand cuts by incrementally urbanizing areas that contain habitat, foraging and propagation land for Hawai'i's endangered and finite native flora and fauna.

The purpose of HAR 13-5 is to regulate land use in the conservation district for the purpose of conserving, protecting, and preserving the important natural resources of the State through appropriate management and use to promote their long-term sustainability.

The applicant is seeking a change from the Hawai'i Loa Special Subzone to the General Subzone (HRS §13-5-14) whose objective is to *designate open space where specific conservation uses may not be defined, but where urban use would be premature.*

This application does not meet HRS §13-5-14 because the following urban type development is not premature but is planned and eminent.

- A four story 160-bed hospital approximately 92,650 sq ft.
- Approximately 120,000 sq ft of office space in two four-story medical office buildings
- Addition of 4,500-5,000 sq ft to the current Academic Center for a radiation treatment space
- Multi-level parking structures and several at grade parking lots to accommodate 1,038 parking stalls
- A new entrance and exit at the H-3 end of the straightened and extended interior road
- A retention basin that is 59,000 cubic feet 2:1 high to vertical slopes with a bottom elevation of 286.5 ft, which will replace the current open space soccer field which is currently used to catch stormwater runoff
- Hospital twenty-four hours a day seven days a week emergency services

The rezone application states that *the new facilities will be constructed substantially within the area which is already developed and No new significant areas of the Property will be disturbed by construction of the new facilities contemplated by Applicant.*

The Master Plan attached map shows a new hospital building with new ancillary parking along the interior road where there are no buildings, two new buildings and parking in the soccer field area where no buildings currently exist and a new building with parking adjacent to an existing building.

Attached Existing Site Plan map shows existing development.

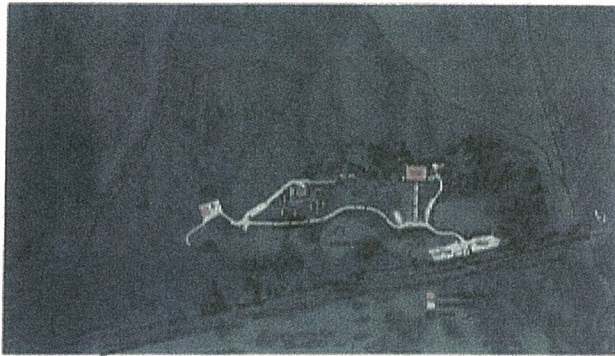
If the Board decides that urbanization and not conservation is the best use of this valley then we urge the Board to require the applicant to seek a boundary amendment to the urban district for the project area shown on the Master Plan map so that the urban uses match the land use designation.

Mills, Kimberly T

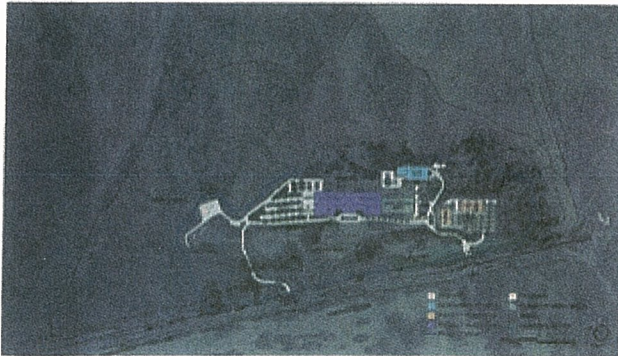
From: donna <htf3000@gmail.com>
Sent: Tuesday, August 18, 2020 1:35 PM
To: Lemmo, Sam J; Mills, Kimberly T
Subject: [EXTERNAL] testimony for 8/19 hearing
Attachments: HPU zone change to General HTF 8.19.20.pdf

Hawaii's Thousand Friends testimony, with 3 attachments, for the August 19, 2020 public hearing on the proposed Hawaii Loa College Special Subzone change to the General Subzone is attached.

Donna Wong
Executive Director
Hawaii's Thousand Friends
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G70 | EXISTING SITE PLAN | 2



G70 | MASTER PLAN | 1

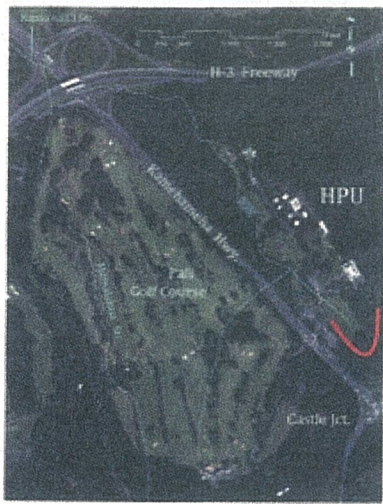


Figure 2 Streams in the vicinity of HPU as depicted by USGS (1998) and the HPU NE OAS (2008) streams delineation

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If the people lead, the leaders will follow. -- Mahatma Gandhi