

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

December 11, 2020

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

**REGARDING:** Final Approval of Proposed Rule Amendment OA 19-01  
Request to Amend the Hawai'i Administrative Rules (HAR) Title  
13, Chapter 5 to Re-designate Conservation District Land that Lies  
Within the Hawai'i Loa College Special Subzone to the General  
Subzone – as Amendments to Section 13-5-10, 13-5-15, and  
Chapter 13-5 Exhibits 1 and 2

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

**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

**BACKGROUND**

A request to amend the existing Hawai'i Loa College special subzone to a "Health and Wellness" special subzone came before the Board of Land and Natural Resources on October 23, 2020. The Board went into an Executive Session and when they emerged, the matter was deferred.

The applicant was told to let the Department know how they wished to proceed and that if the property was proposed to be re-designated into the General subzone that this could be brought before the Board fairly quickly.

**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 subzone 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) identify 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'ohe 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.

The campus is along a scenic corridor of Kamehameha Highway with lush vegetation and open spaces. The Ko'olau Mountain range dominates the view and provides a dramatic natural landscape. To the east view plains encompass Mount Olomana and towards the west is the Hawaiian Memorial Park.

### **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 has filed a request to re-designate the property into the General subzone. The Hawaii Loa College campus property has been acquired by Adventist Health Castle. The Hawaii Loa College Special Subzone designation is specifically for educational purposes and is not consistent with what the new landowner would like to propose for the property.

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.

### **Review of Property Characteristics in Relation to the Proposed Subzone Objectives**

Under HAR, §13-5-14, the objective of the General Subzone is to designate open space where specific conservation uses may not be defined, but where urban use would be premature. Specifically, the General Subzone shall encompass:

- Lands with topography, soils, climate, or other related environmental factors that may not be normally adaptable or presently needed for urban, rural, or agricultural use; and
- Lands suitable for farming, flower gardening, operation of nurseries or orchards, grazing; including facilities accessory to these uses when the facilities are compatible with the natural physical environment.

The site has been previously developed as a college campus with existing infrastructure such as a road network, City sewerage connection, water and electrical services. However, most of the parcel remains undeveloped.

Lands designated in the General subzone generally have fewer natural resources than other subzones and typically have few important biological resources. However, General subzone lands appear to have significant coastal and or scenic resources.

In reviewing the O'ahu Conservation District State Land Use Map, land in the General subzone include vacant steep land on the west facing ridges of Makaha along the Waianae Range, vacant land above Waimea Valley, vacant land along the Anahulu River Valley, vacant land below the

Honolulu Watershed Forest Reserve and Kaipapau Forest Reserve, vacant greenbelt ridges and valleys around residential development from Manana to Kalauao, Wai'alaie to Kalama Valley, the ridges between Kāne'ohē/Kailua and Ho'omaluhia Botanical Gardens.

Staff also notes developed sites within the General subzone includes, the military's Ka'ena Radar Station on the Wai'anae Range; the Honolulu Country Club below the Makalapa Crater; Punchbowl Cemetery at Pūowaiena; inside the Diamond Head Monument at Lae'ahi; the nearby Quarry and the Ko'olau Golf Club and Pali Golf Course across the street from the site.

The Hawai'i Loa College Special Subzone is practically surrounded by the General subzone with the exception of the adjacent steep slopes that are in the Limited subzone.

### 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; §92-7;
- HRS Chapter 201M, Hawaii Small Business Regulatory Flexibility Act;
- HRS §183C-4(f);
- HAR Chapter 13-1, Subchapter 3; and
- HAR §13-5-16.

Amendments to 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. **(EXHIBIT D)**

#### 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 (EXHIBIT E)

Publication of the anticipated public hearing was published in the *Star Advertiser* on July 17, 24, and 31, 2020. 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 their current location nearby in Kailua for 57 years. AHC is committed to continuing to serve the windward community. The existing AHC Kailua facility is getting outdated and needs to be reinvigorated. Written testimony submitted discusses the appropriateness of the proposed 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 F)**

Applicant's 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 G)**

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 then Hawaii Loa College. The Foundation has been impressed with the design and considerations made for the proposed new facility. **(Exhibit H)**

**Agency Response:** Staff analysis tracks an overwhelming public response in support of the subzone amendment.

The Hawai'i 1000 Friends opposes the re-designation. They would like the Board to consider the conservation attributes of the site. The site's open space and view planes, 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."

"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 I)**

**Agency Response:** Staff notes that the subject property has long been developed as an educational institution, with improvements and existing infrastructure consistent with the special subzone use. In addition, much of the surrounding areas are already in the General subzone, so such a change is consistent with existing conservation lands. Further, staff notes that the boundary amendment regarding the nearby Hawaiian Memorial Park Cemetery has already been approved by the Land Use Commission as of October 13, 2020.

**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 final 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 and filing with the Office of the Lieutenant Governor.

**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.

**HRS Chapter 343 and HAR Chapter 200.1 Requirements:**

The Adventist Health Castle Master Plan-Hawai'i Loa Campus Final Environmental Impact Statement, approved and accepted by the Board of Land and Natural Resources, 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 campus property for new medical facilities which are not an identified land use that could be applied for under the current subzone designation. AHC has requested to have the property re-designated to the General Subzone.

Staff has been to the Hawai'i Loa campus and regularly passes by the site. 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 and has historically and traditionally been within the Hawai'i Loa college special subzone.

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. **(Exhibit J)**



In reviewing other developed sites on O'ahu in the Conservation District General subzone, this site is similar to those sites as most of the property is undeveloped and 'open'. Further most of the property is surrounded by lands that lie within the Conservation General subzone with the exception of adjacent steep land that lie within the Limited subzone. **(Exhibits K & L)**

While the property has historically and traditionally been in a special subzone designation, it would not be inappropriate to re-designate the property into the General subzone based on the surrounding uses and lands that are also zoned General subzone.

### 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 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 the General subzone; and
2. Authorize the forwarding of the rule amendment to HAR Chapter 13-5 Exhibits 1 and 2, and associated references, to the Office of the Attorney /general for review and approval to be consistent with the Board's final approval, prior to forwarding to the Governor, State of Hawai'i for approval and adoption, and filing with the Office of the Lieutenant Governor pursuant to HRS Chapter 91.

Respectfully submitted,



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

Approved for submittal:

*Suzanne D. Case*

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

Attachments:

- Exhibit A – Map of Area
- Exhibit B – Applicant's Map of Project Site
- Exhibit C – USGS Topographical Subzone map
- Exhibit D – Draft Rule Amendments to Chapter 13-5
- Exhibit E – Public Hearing Notice
- Exhibit F – Testimony of Applicant
- Exhibit G – Testimony of Applicant's Consultant, G70
- Exhibit H – Written Testimony – Castle Foundation
- Exhibit I – Written Testimony – Hawaii's Thousand Friends
- Exhibit J – Ko'olau Poko Sustainable Communities Plan Map A-2: Land Use
- Exhibit K – Aerial photo of Property from Honolulu Property Tax website
- Exhibit L – Conservation District Map of areas surrounding Hawaii Loa College Special Subzone



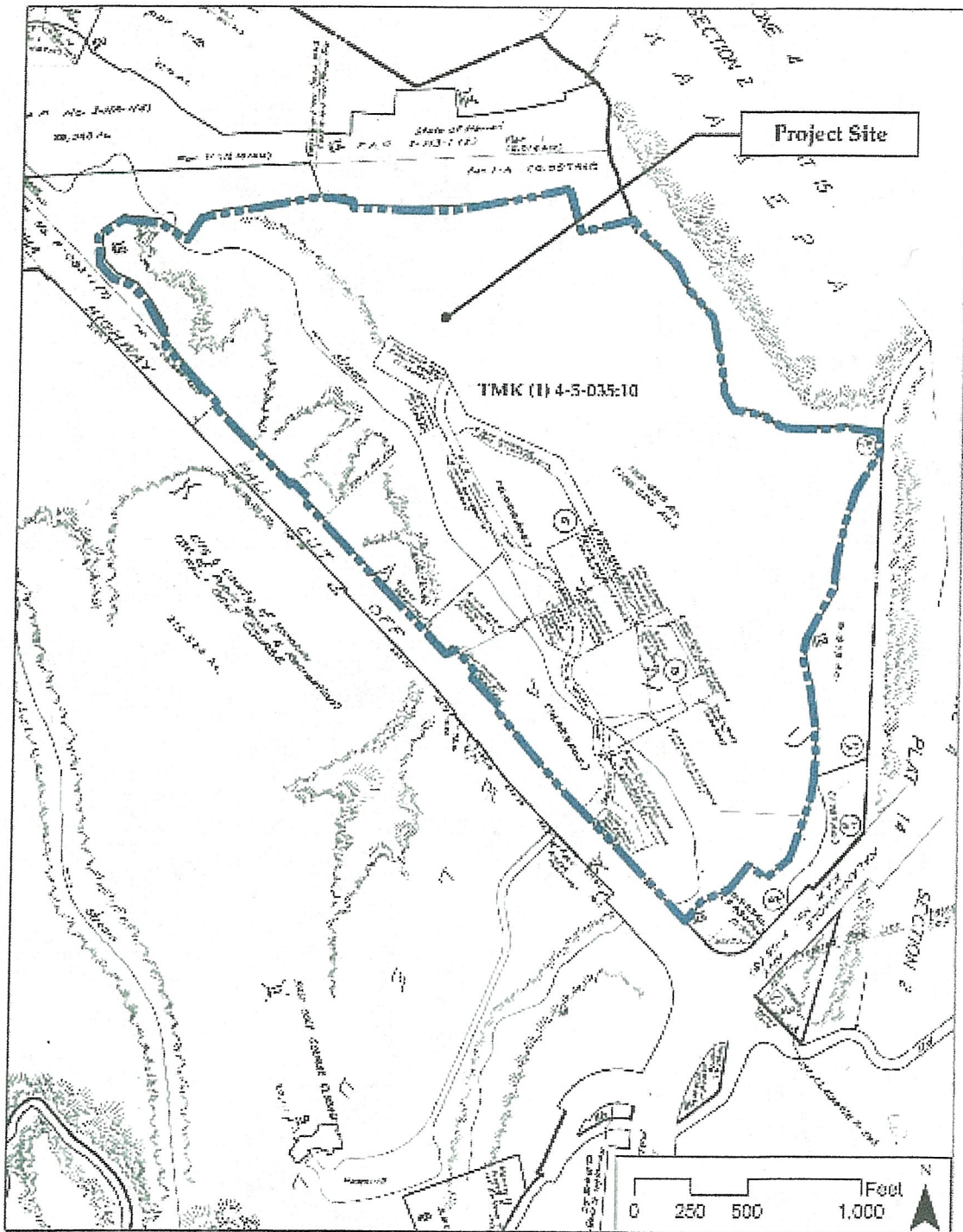
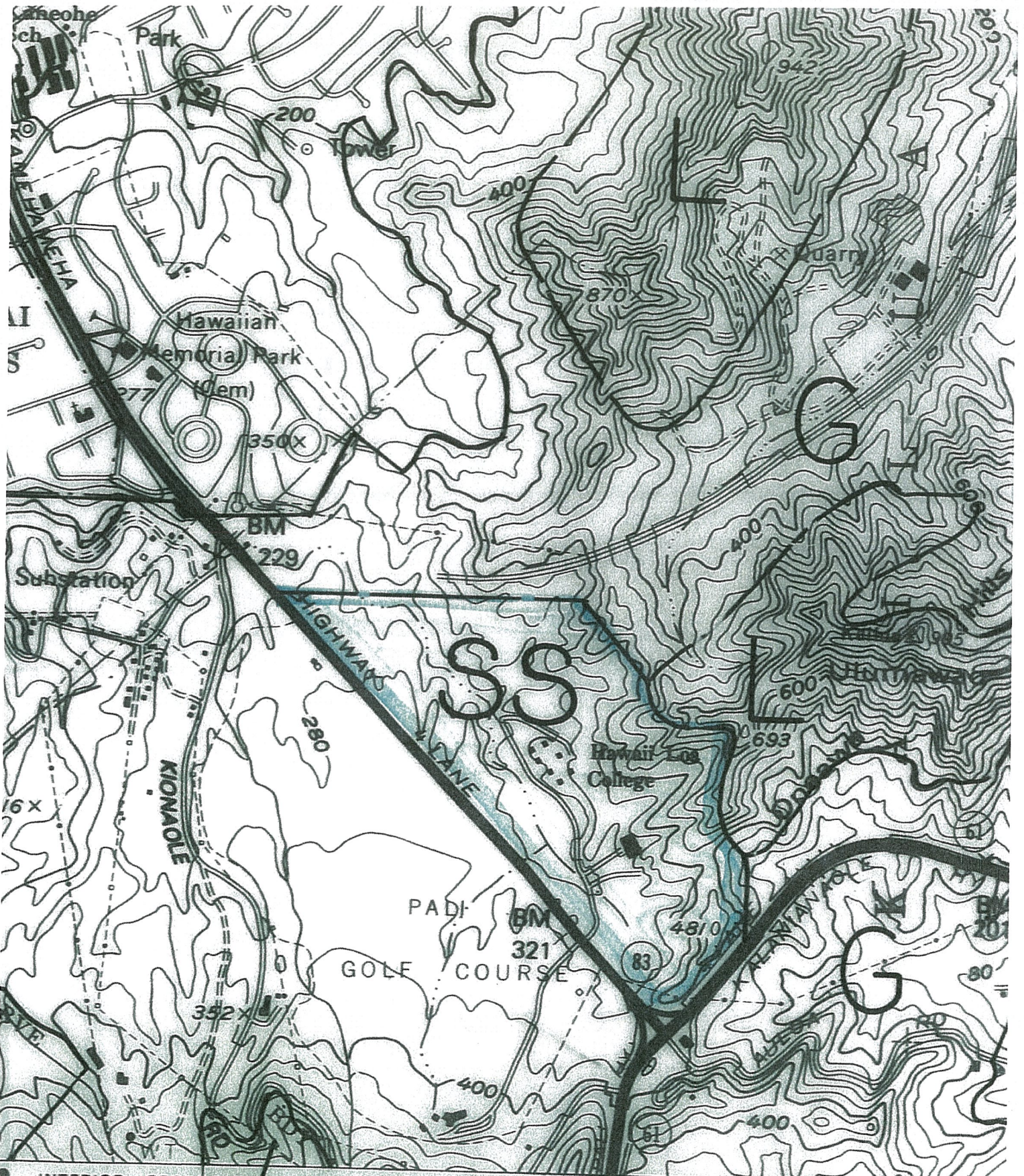


EXHIBIT B



INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1983

HONOLULU (P.O.) 8 MI.

157°

R EXHIBIT C

ROAD CLASSIFICATION

DEPARTMENT OF LAND AND NATURAL RESOURCES

Amendments to Chapter 13-5  
Hawaii Administrative Rules

Adoption Date

1. Section 13-5-10, Hawaii Administrative Rules, is amended by amending subsection (a) to read as follows:

"(a) There are hereby established subzones within the conservation district, as listed in [~~Exhibit 1, entitled "Subzone Designations: August 12, 2011",~~] Exhibit 1, entitled "Subzone designations: June 28, 2019", which is located at the end of this chapter and made a part of this section. Subzone designations of conservation district lands are delineated on maps on file with the department." [Eff 12/12/94; am 2/1/99; am 1/28/02; am 4/27/02; am 4/10/03; am 7/28/06; am 4/7/11; am 8/5/11; am 12/5/11; am 7/5/13; am 11/22/14; am and comp ]  
(Auth: HRS §183C-3) (Imp: HRS §183C-4)

2. Section 13-5-15, Hawaii Administrative Rules, is to read as follows:

"Special (S) Subzone. The objective of this subzone is to provide for sustainable use of areas possessing unique developmental qualities that complement the natural resources of the area. The special subzones are listed in [~~Exhibit 2, entitled "Special Subzones: April 26, 2013,"~~] Exhibit 2, entitled "Special Subzones: June 28, 2019", which is located at the end of this chapter and made a part of this section" [Eff 12/12/94; am and comp 12/5/11; am 7/5/13; am and comp ] (Auth: HRS §183C-3) (Imp: HRS §183C-4)

EXHIBIT D

2. Material, except source notes, to be repealed is bracketed. New material is underscored.

3. Additions to update source notes to reflect these amendments are not underscored.

4. The amendments to section 13-5-10, 13-5-15, Exhibit 1, and Exhibit 2, Hawaii Administrative Rules, shall take effect ten days after filing with the Office of the Lieutenant Governor.

I certify that the foregoing are copies of the rules, drafted in the Ramseyer format pursuant to the requirements of section 91-4.1, Hawaii Revised Statutes, which were adopted on \_\_\_\_\_, and filed with the Office of the Lieutenant Governor.

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Suzanne D. Case., Chairperson  
Board of Land and Natural Resources

APPROVED AS TO FORM:

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Deputy Attorney General

Exhibit 1

Subzone Designations: [~~August 22, 2014~~] June 28, 2019

- (1) "H-1, Makalawena," Hawaii, June 4, 1978
- (2) "H-2, Keahole Point," Hawaii, August 23, 1985
- (3) "H-3, Mahukona," Hawaii, August 23, 1985
- (4) "H-4, Keawanui Bay," Hawaii, June 4, 1978
- (5) "H-5, Anaehoomalu," Hawaii, June 4, 1978
- (6) "H-6, Kiholo," Hawaii, August 23, 1985
- (7) "H-7, Kailua," Hawaii, August 12, 2011
- (8) "H-8, Kealakekua," Hawaii, June 4, 1978
- (9) "H-9, Honaunau," Hawaii, August 22, 2014
- (10) "H-10, Kauluo Point," Hawaii, June 4, 1978
- (11) "H-11, Milolii," Hawaii, August 23, 1985
- (12) "H-12, Manuka Bay," Hawaii, June 4, 1978
- (13) "H-13, Hawi," Hawaii, June 4, 1978
- (14) "H-14, Kawaihae," Hawaii, June 4, 1978
- (15) "H-15, Puu Hinai," Hawaii, June 4, 1978
- (16) "H-16, Puu Anahulu," Hawaii, June 4, 1978
- (17) "H-17, Hualalai," Hawaii, June 4, 1978
- (18) "H-18, Puu Lehua," Hawaii, June 4, 1978
- (19) "H-19, Kaunene," Hawaii, June 4, 1978
- (20) "H-20, Puu Pohakuloa," Hawaii, August 12, 2011
- (21) "H-21, Papa," Hawaii, August 12, 2011
- (22) "H-22, Pohue Bay," Hawaii, August 23, 1985
- (23) "H-23, Puu Hou," Hawaii, June 4, 1978
- (24) "H-24, Honokane," Hawaii, June 4, 1978
- (25) "H-25, Kamuela," Hawaii, June 4, 1978
- (26) "H-26, Nohoaoahae," Hawaii, June 4, 1978
- (27) "H-27, Keamuku," Hawaii, June 4, 1978
- (28) "H-28, Naohueleehua," Hawaii, August 23, 1985
- (29) "H-29, Puu O Uo," Hawaii, August 23, 1985
- (30) "H-30, Sulphur Cone," Hawaii, August 23, 1985
- (31) "H-31, Alika Cone," Hawaii, June 4, 1978
- (32) "H-32, Puu o Keokeo," Hawaii, June 4, 1978
- (33) "H-33, Kahuku Ranch," Hawaii, June 4, 1978
- (34) "H-34, Ka Lae," Hawaii, June 4, 1978
- (35) "H-35, Kukuihaele," Hawaii, June 4, 1978



Chapter 13-5  
Exhibit 1

- (36) "H-36, Makahalau," Hawaii, June 4, 1978
- (37) "H-37, Ahumoa," Hawaii, June 4, 1978
- (38) "H-38, Puu Koli," Hawaii, June 4, 1978
- (39) "H-39, Kokoolau," Hawaii, June 4, 1978
- (40) "H-40, Mauna Loa," Hawaii, June 4, 1978
- (41) "H-41, Keaiwa Reservoir," Hawaii, June 4, 1978
- (42) "H-42, Punaluu," Hawaii, August 12, 2011
- (43) "H-43, Naalehu," Hawaii, August 12, 2011
- (44) "H-44, Honokaa," Hawaii, June 4, 1978
- (45) "H-45, Umikoa," Hawaii, June 4, 1978
- (46) "H-46, Mauna Kea," Hawaii, June 4, 1978
- (47) "H-47, Puu Oo," Hawaii, June 4, 1978
- (48) "H-48, Puu Ulaula," Hawaii, June 4, 1978
- (49) "H-49, Kipuka Pakekake," Hawaii, June 4, 1978
- (50) "H-50, Wood Valley," Hawaii, June 4, 1978
- (51) "H-51, Pahala," Hawaii, June 4, 1978
- (52) "H-52, Kukaiau," Hawaii, June 4, 1978
- (53) "H-53, Keanakolu," Hawaii, June 4, 1978
- (54) "H-54, Puu Akala," Hawaii, June 4, 1978
- (55) "H-55, Upper Piihonua," Hawaii, June 4, 1978
- (56) "H-56, Kulani," Hawaii, June 4, 1978
- (57) "H-57, Kilauea Crater," Hawaii, August 23, 1985
- (58) "H-58, Kau Desert," Hawaii, June 4, 1978
- (59) "H-59, Naliikakani Point," Hawaii, June 4, 1978
- (60) "H-60, Papaalooa," Hawaii, October 22, 1993
- (61) "H-61, Akaka Falls," Hawaii, November 23, 1987
- (62) "H-62, Piihonua," Hawaii, June 4, 1978
- (63) "H-63, Puu Makaala," Hawaii, June 4, 1978
- (64) "H-64, Volcano," Hawaii, June 4, 1978
- (65) "H-65, Makaopuhi Crater," Hawaii, June 4, 1978
- (66) "H-66, Papaikou," Hawaii, June 4, 1978
- (67) "H-67, Hilo," Hawaii, June 4, 1978
- (68) "H-68, Mountain View," Hawaii, June 4, 1978
- (69) "H-69, Kalalua," Hawaii, June 4, 1978
- (70) "H-70, Kalapana," Hawaii, August 23, 1985
- (71) "H-71, Keaau Ranch," Hawaii, June 4, 1978

- (72) "H-72, Pahoa North," Hawaii, June 4, 1978
- (73) "H-73, Pahoa South," Hawaii, June 4, 1978
- (74) "H-74, Kapoho," Hawaii, June 4, 1978
- (75) "M-1, Honolua," Maui, June 4, 1978
- (76) "M-2, Lahaina," Maui, June 4, 1978
- (77) "M-3, Olowalu," Maui, June 4, 1978
- (78) "M-4, Kahakuloa," Maui, June 4, 1978
- (79) "M-5, Wailuku," Maui, August 12, 2011
- (80) "M-6, Maalaea," Maui, June 4, 1978
- (81) "M-7, Paia," Maui, June 4, 1978
- (82) "M-8, Puu O Kali," Maui, June 4, 1978
- (83) "M-9, Makena," Maui, June 4, 1978
- (84) "M-10, Haiku," Maui, August 12, 2011
- (85) "M-11, Kilohana," Maui, August 23, 1985
- (86) "M-12, Lualailua," Maui, June 4, 1978
- (87) "M-13, Keanae," Maui, June 4, 1978
- (88) "M-14, Nahiku," Maui, June 4, 1978
- (89) "M-15, Kaupo," Maui, August 12, 2011
- (90) "M-16, Hana," Maui, August 23, 1985
- (91) "M-17, Kipahulu," Maui, July 25, 1988
- (92) "Mo-1, Ilio Point," Molokai, June 4, 1978
- (93) "Mo-2, Molokai Airport," August 23, 1985
- (94) "Mo-3, Kaunakakai," Molokai, August 23, 1985
- (95) "Mo-4, Kamalo," Molokai, June 4, 1978
- (96) "Mo-5, Halawa," Molokai, June 4, 1978
- (97) "Lanai," June 4, 1978
- (98) "Kahoolawe," June 4, 1978
- (99) "O-1, Kaena," Oahu, August 12, 2011
- (100) "O-2, Waianae," Oahu, December 13, 2002
- (101) "O-3, Waimea," Oahu, January 27, 2011
- (102) "O-4, Haleiwa," Oahu, August 23, 1985
- (103) "O-5, Schofield Barracks," Oahu, June 4, 1978
- (104) "O-6, Ewa," Oahu, June 4, 1978
- (105) "O-7, Kahuku," Oahu, June 4, 1978
- (106) "O-8, Hauula," Oahu, June 4, 1978
- (107) "O-9, Waipahu," Oahu, June 4, 1978
- (108) "O-10, Puuloa," Oahu, August 23, 1985
- (109) "O-11, Kahana," Oahu, March 24, 1994
- (110) "O-12, Kaneohe," Oahu, [~~March 24, 2011~~]  
June 28, 2019

Chapter 13-5  
Exhibit 1

- (111) "0-13, Honolulu," Oahu, August 12, 2011
- (112) "0-14, Mokapu," Oahu, August 23, 1985
- (113) "0-15, Koko Head," Oahu, August 12, 2011
- (114) "K-1, Makaha Point," Kauai, June 4, 1978
- (115) "K-2, Kekaha," Kauai, June 4, 1978
- (116) "K-3, Haena," Kauai, August 12, 1992
- (117) "K-4, Waimea Canyon," Kauai, June 4, 1978
- (118) "K-5, Hanapepe," Kauai, June 4, 1978
- (119) "K-6, Hanalei," Kauai, June 4, 1978
- (120) "K-7, Waialeale," Kauai, June 4, 1978
- (121) "K-8, Koloa," Kauai, August 23, 1985
- (122) "K-9, Anahola," Kauai, June 9, 2006
- (123) "K-10, Kapaa," Kauai, June 9, 2006
- (124) "K-11, Lihue," Kauai, August 23, 1985

Exhibit 2

Special Subzones: [~~April 26, 2013~~] June 28, 2019

~~[(1) Hawaii Loa college special subzone. Subzone designation for educational purposes as delineated on map entitled "0-12, Kaneohe," Oahu];~~

~~[(2)]~~ (1) Haka site special subzone. Subzone designation for cemetery purposes as delineated on map entitled "0-12, Kaneohe," Oahu;

~~[(3)]~~ (2) Kapakahi Ridge special subzone. Subzone designation for nursing or convalescent home purposes as delineated on map entitled "0-13, Honolulu," Oahu;

~~[(4)]~~ (3) Sea Life park special subzone. Subzone designation for recreational, educational, commercial purposes as delineated on map entitled "0-15, Koko Head," Oahu;

~~[(5)]~~ (4) Milolii-Hoopuloa special subzone. Subzone designation for Milolii-Hoopuloa fishing village purposes including fishing activities, residential, educational, cultural and recreational uses pursuant to Act 86, SLH 1991, as delineated on map entitled "H-11, Milolii," Hawaii;

~~[(6)]~~ (5) Hale O Ho'oponopono special subzone. Subzone designation for educational purposes as delineated on map entitled "H-9, Honaunau," Hawaii;

~~[(7)]~~ (6) Limahuli Valley special subzone. Subzone designation for educational, recreational, and research purposes as

Chapter 13-5  
Exhibit 2

delineated on map entitled "K-3, Haena,"  
Kauai.

~~[(8)]~~(7) Lawai Kai special subzone.  
Subzone designation for educational,  
recreational, and research purposes as  
delineated on map entitled "K-8, Koloa,"  
Kauai.

STATE OF HAWAI'I  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
**NOTICE OF PUBLIC HEARING**

PROPOSED AMENDMENT TO CHAPTER 13-5, HAWAI'I ADMINISTRATIVE  
RULES TO REDESIGNATE CONSERVATION DISTRICT LAND LOCATED AT  
KĀNE'OHE, O'AHU

The Department of Land and Natural Resources (DLNR) will hold a public hearing regarding a petition for a Chapter 13-5, Hawai'i Administrative Rule (HAR) amendment to re-designate Conservation District land known as TMK: (1) 4-5-035:010 located at Kāne'ohe, O'ahu from the Hawai'i Loa college special subzone to the general subzone.

**The 5:30 p.m. standing room only public hearing shall be held on August 19, 2020, at the Kalanimoku Building Makai Breezeway located at 1151 Punchbowl St. in Honolulu.** All persons in attendance are encouraged to wear a cloth face covering as described and recommended by the Centers for Disease Control and Prevention. The public hearing will be conducted consistent with all applicable social distancing requirements or other safeguards associated with COVID-19. Such measures may include, but are not limited to, ensuring that all persons maintain a minimum of six feet of physical separation from other persons to the extent possible.

All interested persons are welcomed to attend the public hearing to present relevant information and individual opinion for the DLNR to consider. Postmark by September 22, 2020, any person may file with the Board written comments or recommendations in support of or in opposition to the proposed subzone re-designation. Written testimony should be mailed to the Office of Conservation and Coastal Lands, P.O. Box 621, Honolulu, HI 96809. The Board of Land and Natural Resources shall take final action on this rule making at a future regularly scheduled Board meeting.

A copy of the application for conservation subzone re-designation shall be forwarded to the Kāne'ohe and Kailua State Public Library and is available on the OCCL website under current applications at [dlnr.hawaii.gov/occl](http://dlnr.hawaii.gov/occl). An electronic copy of the subject proposal can be mailed to all persons for a fee of \$8.00 who have made a written request.

Disabled individuals planning to attend the hearing are asked to contact the Office of Conservation and Coastal Lands at least four days in advance of the public hearing to indicate if they have special needs which require accommodations. For more information regarding this matter, contact Tiger Mills at 587-0382 or at [kimberly.mills@hawaii.gov](mailto:kimberly.mills@hawaii.gov).

BOARD OF LAND AND NATURAL RESOURCES

\_\_\_\_\_ Dated: \_\_\_\_\_  
Suzanne D. Case, Chairperson

PUBLICATION DATES: \_\_\_\_\_  
Honolulu Star Advertiser

EXHIBIT E

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 F

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 G**

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](mailto:sam.j.lemmo@hawaii.gov)

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

Re-designation of TMK (1) 4-5-035:010 in Kaneohe 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.

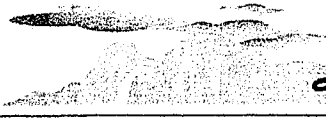
Sincerely,

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

EXHIBIT H

1197 Auloa Road  
Kailua, Hawai'i  
96734

tel 808-263-7073  
fax 808-261-6918  
[www.castlefoundation.org](http://www.castlefoundation.org)



## *Hawaii's Thousand Friends*

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

August 19, 2020

Samuel Lemmo  
Administrator  
Office of Conservation and Coastal Lands  
[sam.i.lemmo@hawaii.gov](mailto:sam.i.lemmo@hawaii.gov)

Kimberly (Tiger) Mills  
Office of Conservation and Coastal Lands  
[Kimberly.mills@hawaii.gov](mailto: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 I

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.

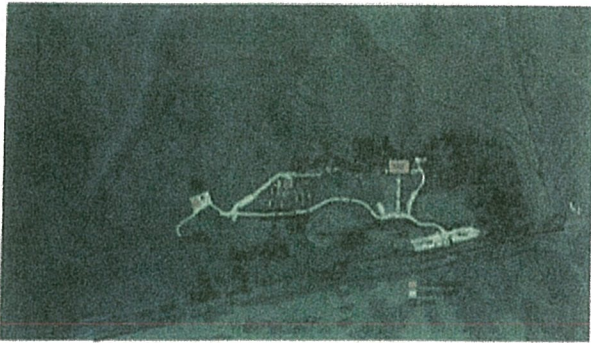
**Mills, Kimberly T**

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**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  
Phone/fax: 808-262-0682  
[www.hawaiis1000friends.org](http://www.hawaiis1000friends.org)



G70 | EXISTING SITE PLAN | 7



G70 | MASTER PLAN | 1



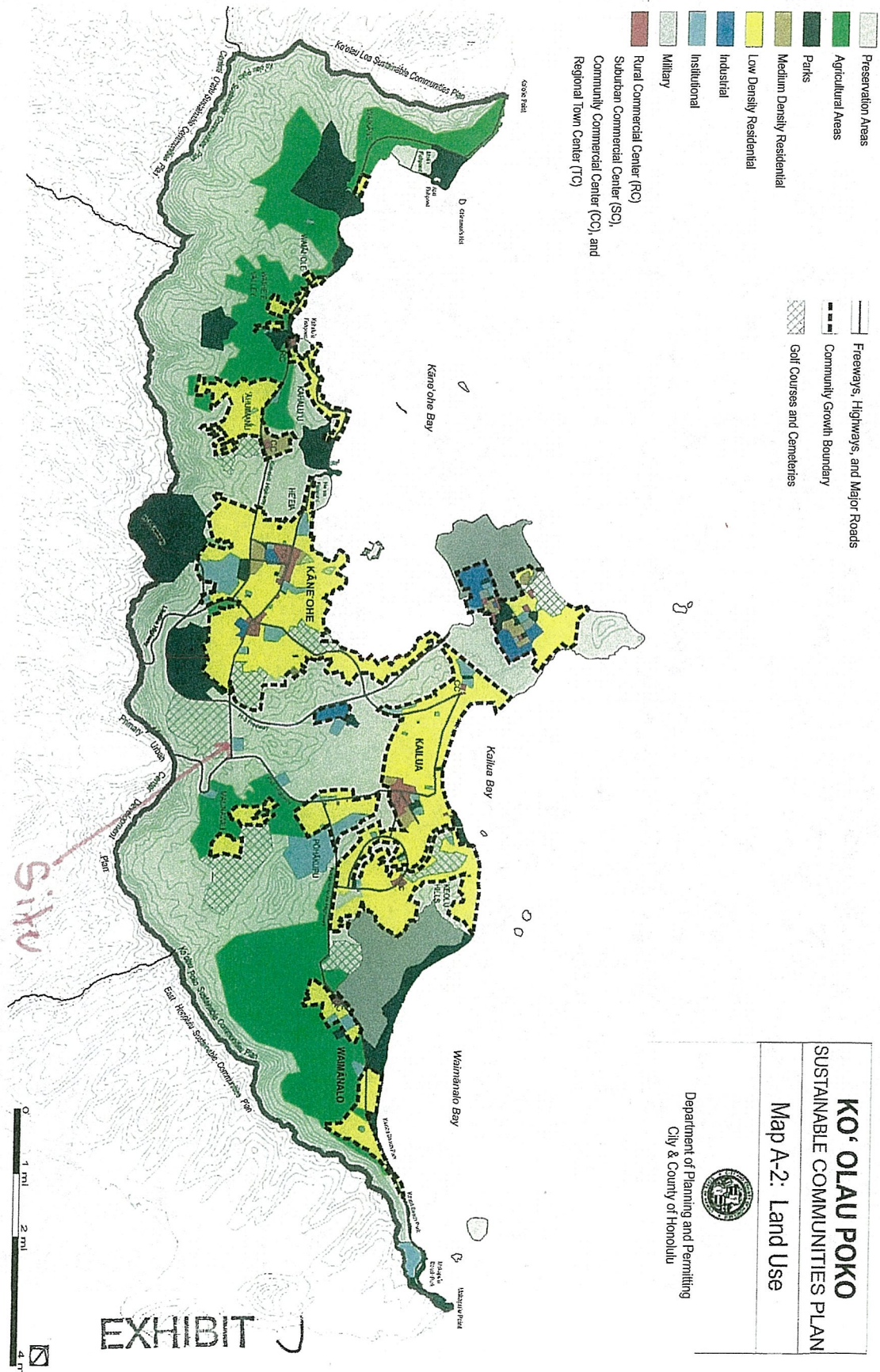


Figure 2 Streams in the vicinity of HPU as depicted by SCS (1998) and the HDX SR 048 (2004) stream shapefile

Donna Wong  
Executive Director  
Hawaii's Thousand Friends  
Phone/fax: 808-262-0682  
[www.hawaii1000friends.org](http://www.hawaii1000friends.org)

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

I-5



- Preservation Areas
- Agricultural Areas
- Parks
- Medium Density Residential
- Low Density Residential
- Industrial
- Institutional
- Military
- Rural Commercial Center (RC)
- Suburban Commercial Center (SC)
- Community Commercial Center (CC), and
- Regional Town Center (TC)

- Freeways, Highways, and Major Roads
- Community Growth Boundary
- Golf Courses and Cemeteries

**KO'OLAUPOKO**  
SUSTAINABLE COMMUNITIES PLAN

Map A-2: Land Use



Department of Planning and Permitting  
City & County of Honolulu

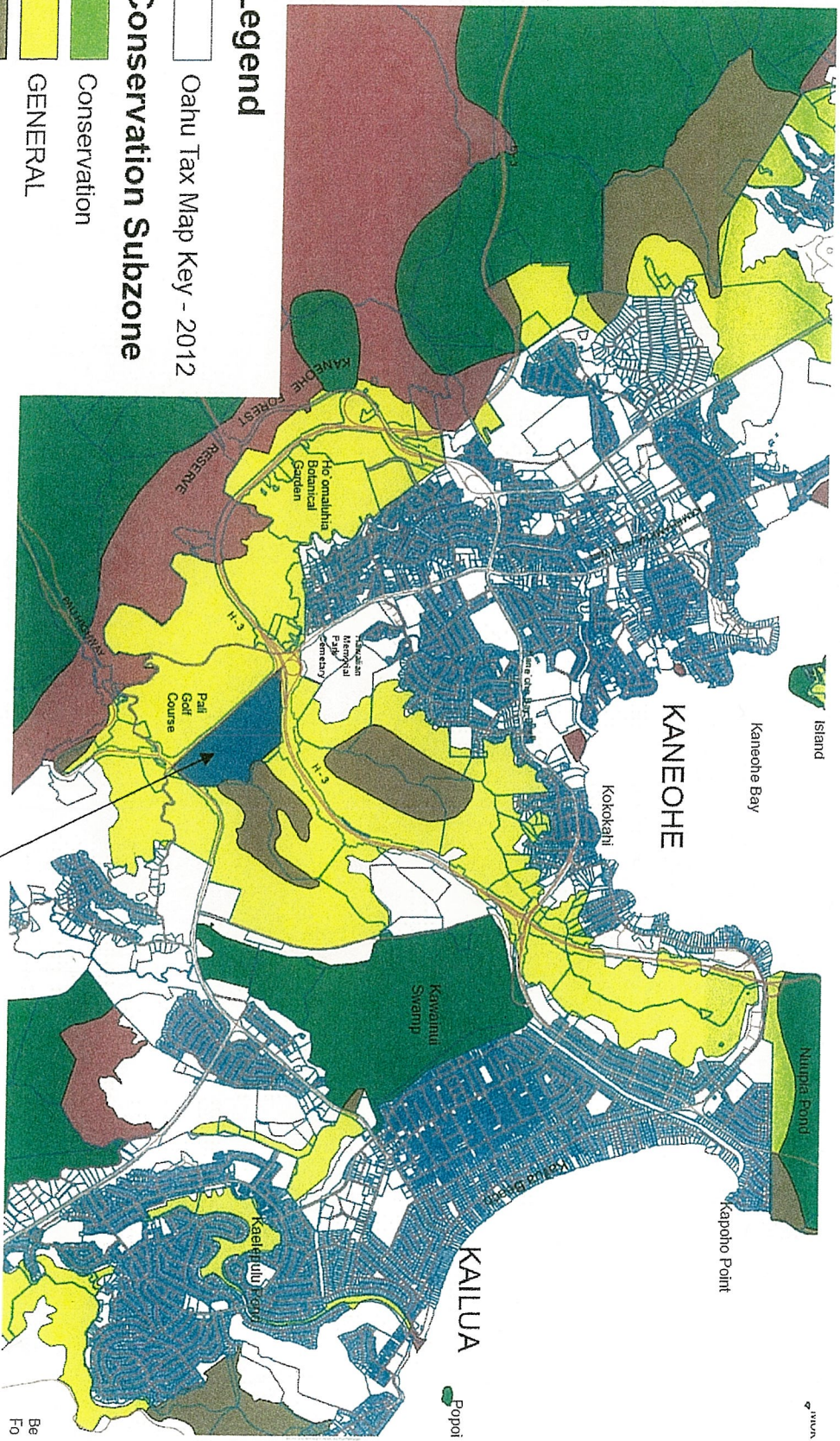
EXHIBIT





EXHIBIT K

- Legend**
- Oahu Tax Map Key - 2012
- Conservation Subzone**
- Conservation
  - GENERAL
  - LIMITED
  - PROTECTED
  - RESOURCE
  - SPECIAL



Hawaii Loa Special Subzone, TMK: (1) 4-5-035:010