

1. Relationship of the Proposed Action to Land Use Plans, Policies and Controls for the affected area.

Please expound on the paragraph on page 4-164. In accordance with Section 11-200-17(h), Hawai‘i Administrative Rules, please discuss if there are any conflicts or inconsistencies in the proposed project. If so, please discuss the reasons that you plan to proceed notwithstanding the absence of full reconciliation.

In Section 4.17.10 on page 4-164, pursuant to Section 11-200-17(j), Hawai‘i Administrative Rules, please discuss the extent to which the proposed project would foreclose future options and the extent to which the proposed project would narrow the range of beneficial uses of the environment or pose long-term risks to health and safety.

2. Status of Necessary Approvals

Table 4-37 on page 4-176 presents the list of necessary approvals. Pursuant to Section 11-200-17(h), Hawai‘i Administrative Rules, please also indicate the status of each approval.

3. Resources – Irreversible and Irretrievable Commitments

In Section 4.19 on page 4-175, pursuant to Section 11-200-17(k), Hawai‘i Administrative Rules, please expound on the existing text by considering “resources” only as “energy, construction materials, and labor.” The rule notes that “resources” also means natural and cultural resources committed to loss or destruction by the action.

4. Recommendation – Summary Table of Probable Unavoidable Adverse Environmental Effects

Section 11-200-17(l), Hawai‘i Administrative Rules states in pertinent part that “[t]he draft EIS shall address all probable adverse environmental effects which cannot be avoided. It would be helpful if the EIS included a table summarizing these unavoidable probable adverse environmental effects

5. Mitigation of Hazardous Materials or Wastes, Potential Toxic Tort Liability Issues

Pursuant to Section 11-200-17(m), Hawai‘i Administrative Rules, with respect to mitigation for impacts from hazardous materials and/or wastes, Section 4.11, on page 4-113, notes that the City would perform partial or complete Phase I Site Assessments in accordance with American Society for Testing and Materials protocol E1527-05. Please discuss what measures the City would take with respect to remediation and/or removal of the offending hazardous materials or wastes contamination prior to property acquisition.

6. Mitigation in General

With respect to mitigation measures in general, please discuss measures to reduce significant, unavoidable, adverse impacts to insignificant levels and the basis for considering these levels acceptable. Also, where a particular mitigation measure has been chosen from among several alternative mitigation measures, please discuss each alternative measure and disclose the reasons for choosing a particular one. Please discuss the timing of each step in any mitigation process. Please disclose what performance bonds (if any) may be posted, as well as provisions proposed to assure that the mitigation measures will be taken.

7. Summary of Unresolved Issues with Discussion

Pursuant to Section 11-200-17(p), Hawai'i Administrative Rules, please include in a separate and distinct section in the EIS that summarizes unresolved issues and contains either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the problems.