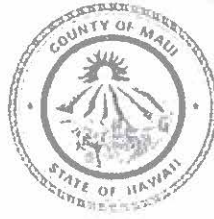


FILE COPY

MICHAEL P. VICTORINO
Mayor

LORI TSUHAKO
Director

LINDA R. MUNSELL
Deputy Director



MAY 23 2021



DEPARTMENT OF HOUSING
& HUMAN CONCERNS
COUNTY OF MAUI
2200 MAIN STREET, SUITE 546
WAILUKU, MAUI, HAWAII 96793
PHONE: (808) 270-7805

May 10, 2021

Dr. Keith Kawaoka, Acting Director
State of Hawai'i
Department of Health
Office of Environmental Quality Control
235 South Beretania Street, Room 702
Honolulu, Hawai'i 96813

Dear Dr. Kawaoka:

SUBJECT: Proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i; Publication of the Final Environmental Assessment and Finding of No Significant Impact Determination

With this letter, the County of Maui, Department of Housing and Human Concerns hereby transmits the Final Environmental Assessment and Finding of No Significant Impact determination (FEA-FONSI) for the Proposed Hōkūao 201H Housing Project at (2) 4-9-002:061 (por.), (2) 4-9-014:001 (por.) and 009 (por.) on the island of Lāna'i, for publication in the next available edition of the Environmental Notice.

Enclosed are an Adobe Acrobat PDF file of the FEA-FONSI and a zip file that contains the shapefile of the project's location map.

If there are any questions, please contact Buddy Almeida of the Housing Division at (808) 270-7351.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tshako".

LORI TSUHAKO, LSW, ACSW
Director of Housing and Human Concerns

Enclosures

cc: Keiki-Pua Dancil, Pūlama Lāna'i
Karlynn Fukuda, Munekiyo Hiraga
Buddy Almeida, Housing Administrator

From: webmaster@hawaii.gov
To: [HI Office of Environmental Quality Control](#)
Subject: New online submission for The Environmental Notice
Date: Friday, May 14, 2021 9:32:30 AM

Action Name

Proposed Hokuao 201H Residential Project

Type of Document/Determination

Final environmental assessment and finding of no significant impact (FEA-FONSI)

HRS §343-5(a) Trigger(s)

- (1) Propose the use of state or county lands or the use of state or county funds

Judicial district

Lānaʻi, Maui

Tax Map Key(s) (TMK(s))

(2)4-9-002:061 (por.), (2)4-9-014:001 (por.) and 009 (por.)

Action type

Applicant

Other required permits and approvals

County grading and building permits, County Subdivision Approval

Discretionary consent required

HRS 201H-38 Affordable Housing Approval by Maui County Council and District Boundary Amendment by State Land Use Commission

Approving agency

County of Maui, Department of Housing and Human Concerns

Agency contact name

Lori Tsuhako

Agency contact email (for info about the action)

director.hhc@mauicounty.gov

Email address or URL for receiving comments

planning@munekiyohiraga.com

Agency contact phone

(808) 270-7351

Agency address

2200 Main Street, Suite 546
Wailuku, HI 96793
United States
[Map It](#)

Applicant

Lanai Resorts, dba Pulama Lanai

Applicant contact name

Keiki-Pua Dancil

Applicant contact email

kdancil@pulamalanai.com

Applicant contact phone

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[Map It](#)

Was this submittal prepared by a consultant?

Yes

Consultant

Munekiyo Hiraga

Consultant contact name

Chris Sugidono

Consultant contact email

planning@munekiyohiraga.com

Consultant contact phone

(808) 244-2015

Consultant address

305 South High Street, Suite 104
Wailuku, Hawaii 96793
United States
[Map It](#)

Action summary

The proposed Hōkūāo Housing Project comprises approximately 76-acres of land in the Kamoku Ahupua'a of Lāna'i Island. Hōkūāo is proposed to be developed as an affordable housing project under the provisions of Chapter 201H (Hawai'i Revised Statutes). The Hōkūāo project proposes: 150-single family homes (76 affordable homes for rent, 74-market rate homes for rent); lot sizes will be generally 8,000 square feet; and all homes will reflect the existing design vernacular of Lāna'i City. Along the east edge bordering the school fields, the project provides a one-acre park, a 1,500-square foot community center for use by the Lāna'i community, and 60 parking stalls for intermittent parking. An existing drainage swale on the western boundary carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant (WWTP) with a 600-foot buffer between the closest lot at the WWTP edge.

Reasons supporting determination

See Chapter 6 - Determination with Findings and Reasons Supporting

Attached documents (signed agency letter & EA/EIS)

- [OEQC-DHHC-FONSI-Letter.pdf](#)
- [Hokuao_201H_Housing_Project_May-2021.Final-EA-Volume-I-of-II.pdf](#)
- [Hokuao_201H_Housing_Project_May-2021.Final-EA-Volume-II-of-II.pdf](#)

Shapefile

- The location map for this Final EA is the same as the location map for the associated Draft EA.

Action location map

- [Hokuao_201H_Housing_Project_TMks.shape.zip](#)

Authorized individual

Chris Sugidono

Authorization

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

VOLUME I OF II

Final Environmental Assessment

HŌKŪAO 201H HOUSING PROJECT LĀNA'I CITY, LĀNA'I, HAWAI'I

(TMK NO. (2)4-9-002:061(por.);
(2)4-9-014:001(por.);
(2)4-9-014:009(por.))

Prepared for:

Lanai Resorts, LLC,
a Hawai'i limited liability company
doing business as Pūlama Lāna'i

May 2021

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MUNEKIYO HIRAGA

Planning. Project Management. Sustainable Solutions.

VOLUME I OF II

Final Environmental Assessment

HŌKŪAO 201H HOUSING PROJECT LĀNA‘I CITY, LĀNA‘I, HAWAI‘I

**(TMK NO. (2)4-9-002:061(por.);
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May 2021

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Executive Summary

Project Name:	Hökūao 201H Housing Project
Type of Document:	Final Environmental Assessment
Legal Authority:	Chapter 343, Hawai'i Revised Statutes
Anticipated Determination:	Finding of No Significant Impact (FONSI)
Applicable Environmental Assessment review "Trigger":	Relocation of Existing Sewerline and Improvements to County Right-of-Way for Ninth and Twelfth Streets
Location:	Lāna'i Island Lāna'i City TMK Nos. (2)4-9-002:061 (portion) (2)4-9-014:001 (portion) (2)4-9-014:009 (portion)
Applicant & Landowner:	Lana'i Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i 733 Bishop Street, Suite 1500 Honolulu, Hawai'i 96813
Approving Agency:	County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793 Contact: Buddy Almeida Phone No.: (808) 270-7351
Consultant:	Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793 Contact: Chris Sugidono Phone: (808) 244-2015
Project Summary:	In response to the current and projected shortage of affordable housing on Lāna'i Island, Pūlama Lāna'i (Applicant) proposes to develop 76 affordable rental homes as part of a 150-single-family residential housing project in Lāna'i City, Lāna'i, Hawai'i. The subject

property is identified by (2) 4-9-002:061 (portion), (2) 4-9-014:001 (portion) and (2) 4-9-014:009 (portion), and covers an area of approximately 76 acres of land. The project site is located near the Lānaʻi Police Station and Dole Park to the northeast and will connect to Lānaʻi City via 9th Street and 12th Street extensions, which intersect with Fraser Avenue. Pūlama Lānaʻi Central Offices are located to the southeast of the project and the County Wastewater Treatment Plant is to the southwest. The proposed project site covers portions of three neighboring parcels owned by Lānaʻi Resorts, LLC, with most of the project located on former pineapple fields. TMK (2) 4-9-002:061 (por.) (Parcel 061) is a large parcel of approximately 16,124 acres that covers a significant portion of Lānaʻi Island and includes both undeveloped lands and most of the abandoned pineapple fields. TMK (2) 4-9-014:001 (por.) (Parcel 001) is approximately 84 acres and includes the Pūlama Lānaʻi Nursery, community gardens for residents and vacant lands. TMK (2) 4-9-014:009 (por.) (Parcel 009) comprises approximately 25.65 acres and includes the island's original power plant -- now demolished -- and a graded yard used to store shipping containers.

The Hōkūao 201H Housing Project proposes construction of 150-single-family homes, with 76-homes exclusively for rent to households falling within the HUD low-income guidelines, adjusted for Lānaʻi by the County of Maui Department of Housing and Human Concerns, and 74-homes to be rented at market rates. The project also includes a 1-acre park, a 1,500-square-foot community center for use by the Lānaʻi community, and 60-parking stalls for intermittent parking (e.g., community events at the community center, guests visiting residents of the Hōkūao residential units, etc.). Ninth and 12th Streets, both of which are currently dirt roads, will be improved as part of this project. The project site is designated "Urban" and "Agricultural" by the State Land Use Commission; "Park", "Open Space", "Road", "Mixed-Use Residential", and "Public/Quasi-Public" by the Lānaʻi Community Plan; and "Interim", "Open Space", "Active Open Space", "Road" and "Agricultural" by Maui County Zoning. The project area is not located in the Special Management Area (SMA) of the island of Lānaʻi. The Applicant proposes to seek approval from the Maui County Council through a Section 201H-38, Hawaiʻi Revised Statutes (HRS), application. Section 201H-38, HRS, promotes the delivery of affordable housing by exempting endorsed

projects from “all statutes, ordinances, charter provisions, and rules of any governmental agency relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of units thereon.” Among other exemptions, the Applicant will be seeking exemption from the Community Plan Amendment (CPA) and Change in Zoning (CIZ) approval processes, as well as County requirements, including public infrastructure fees.

It is anticipated that offsite improvements potentially affecting County of Maui Right-of-Way (ROW) lands and the relocation of an existing County sewerline will be required for the proposed project. As such, a Chapter 343, Hawai'i Revised Statutes (HRS) Environmental Assessment (EA) will need to be prepared due to use of County lands. The Chapter 343, HRS EA will serve as the primary technical supporting document for the 201H-38 housing application. As the 201H application will be the first discretionary approval sought for the project, Department of Housing and Human Concerns (DHHC) was determined to be the Approving Agency for the Chapter 343, HRS EA.

List of Acronyms

12-MAP	12-Month Moving Average
AIS	Archaeological Inventory Survey
ALISH	Agricultural Lands of Importance to the State of Hawai'i
AMI	Area Median Income
AOC	area of concern
bgs	below ground surface
BMPs	Best Management Practices
C-EHMP	Construction Specific Environmental Hazard Management Plan
cf	Cubic Feet
cfs	Cubic Feet per Second
CIA	Cultural Impact Assessment
CIZ	Change of Zoning
CMRP	Central Maui Regional Park
CO2 EQ	Carbon dioxide equivalent
COPCs	chemicals of potential concern
CPA	Community Plan Amendment
CRECs	controlled recognized environmental conditions
CWRM	Commission on Water Resource Management
CZM	Coastal Zone Management
DEM	Department of Environmental Management
DHHC	Department of Housing and Human Concerns
DLNR	Department of Land and Natural Resources
DOE	Department of Education
DOFAW	Department of Fish and Wildlife
DU	decision unit
EA	Environmental Assessment
EALs	Environmental Action Levels
EHE	Environmental Hazard Evaluation
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FONSI	Findings of No Significant Impact
FSAP	Final Sampling and Analysis Plan
GHG	Greenhouse Gases
GPD	Gallons per day
gpm	gallons per minute
GPS	Global Positioning System
HAR	Hawai'i Administrative Rules
HCZMP	Hawai'i Coastal Zone Management Program

HDOH	Hawai'i Department of Health
HECO	Hawaiian Electric Company, Ltd
HEER	Hawai'i Evaluation Emergency Response
HRS	Hawai'i Revised Statutes
HRWA	Hawai'i Rural Water Association
HTCO	Hawaiian Telcom
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
km	kilometer
kVA	kilo-volt Amperes
LCP	Lāna'i Community Plan
LOS	Level of Service
LSB	Land Study Bureau
LWAC	Lāna'i Water Advisory Committee
LWC	Lāna'i Water Company (LWC)
m	meters
MCC	Maui County Code
MECO	Maui Electric. Co.
MG	Million Gallons
mgd	Million Gallons per Day
MI	multi-increment
MIP	Maui Island Plan
mph	miles per hour
NFA	No Further Action
NPDES	National Pollutant Discharge Elimination System
PD	Project District
PER	Preliminary Engineering Report
PRV	pressure reducing valve
PUC	State Public Utilities Commission
RACR	Removal Action Completion Report
RAM	Robust Analytical Modeling
RAWP	Removal Action Work Plan
RECs	recognized environmental conditions
ROW	Right-of-Way
SAP	Sampling and Analysis Plan
SCR/EHE	Site Characterization Report & Environmental Hazard Evaluation
SHPD	State Historic Preservation Division
SMA	Special Management Area
SY	sustainable yield
TGM	Technical Guidance Manual
TIAR	Traffic Impact Analysis Report

TMK	Tax Map Key
TPH-D	Total Petroleum Hydrocarbons as Diesel
TPH-O	Total Petroleum Hydrocarbons as Oil
UGB	Urban Growth Boundary
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
WUDP	Water Use and Development Plans
WWRD	Wastewater Reclamation Division
WWRF	Wastewater Reclamation Facility



PROJECT OVERVIEW



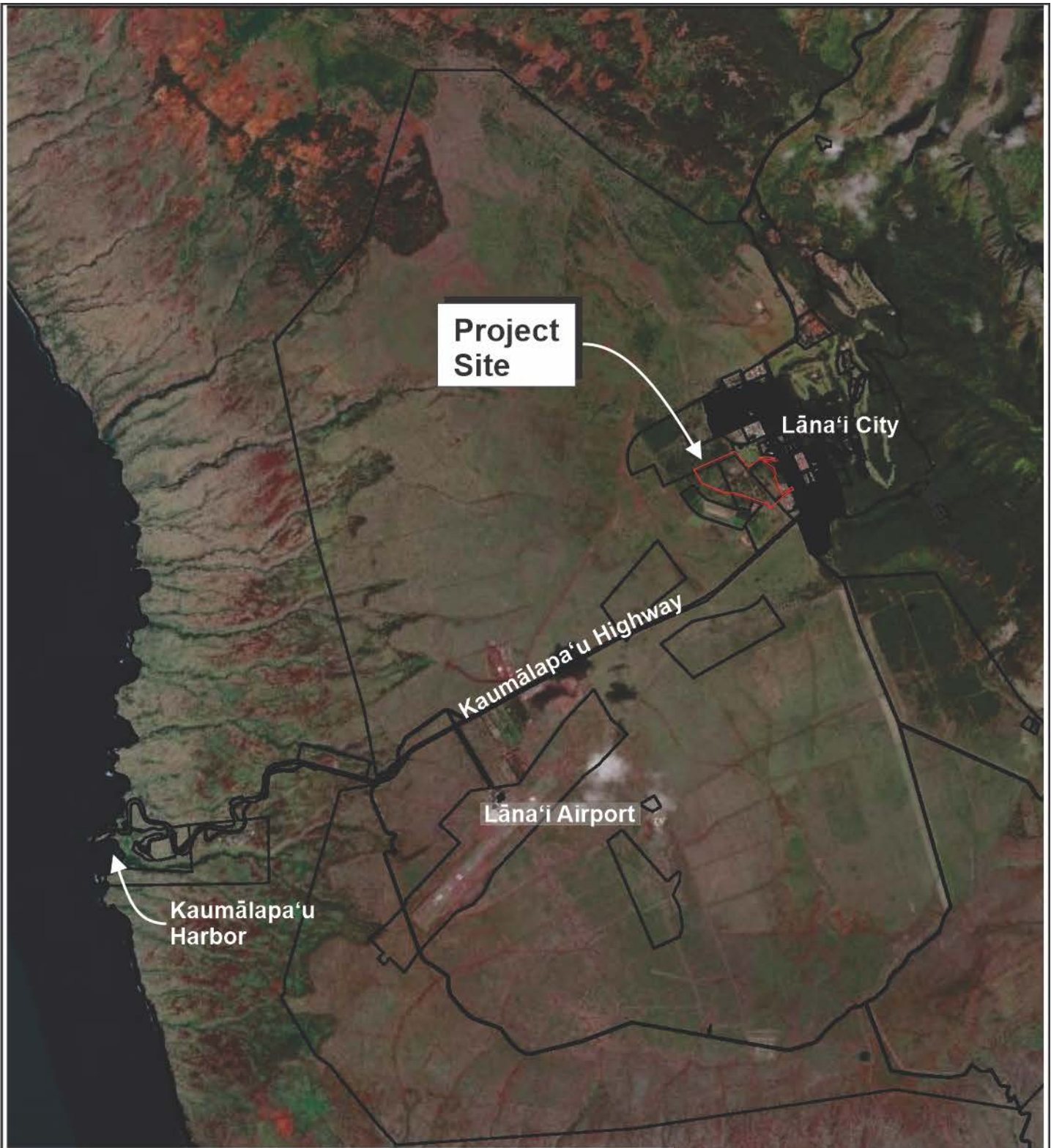
I. PROJECT OVERVIEW

A. PROPERTY LOCATION, EXISTING USE, AND LAND OWNERSHIP

In response to the current and projected shortage of affordable housing on Lānaʻi Island, Pūlama Lānaʻi (Applicant) proposes to develop 76 affordable rental homes as part of a 150-single-family residential housing project in Lānaʻi City, Lānaʻi, Hawaiʻi. See **Figure 1**. The subject properties are identified by Tax Map Key (TMK) parcel numbers (2)4-9-002:061 (portion), (2)4-9-014:001 (portion), and (2)4-9-014:009 (portion), and covers an area of approximately 76 acres of land (hereafter referred to as “project site”). See **Figure 2**. The project site is located near the Lānaʻi Police Station and Dole Park to the northeast and will connect to Lānaʻi City via 9th Street and 12th Street extensions, which intersect with Fraser Avenue. Pūlama Lānaʻi’s Central Offices are located to the southeast of the project and the County Wastewater Treatment Plant is located to the southwest. The proposed project site covers portions of three (3) neighboring parcels owned by Lānaʻi Resorts, LLC, with most of the project located on former pineapple fields. TMK (2)4-9-002:061 (por.) (Parcel 061) is a large parcel of approximately 16,124 acres that covers a significant portion of Lānaʻi Island and includes both undeveloped lands and most of the abandoned pineapple fields. TMK (2) 4–9–014:001 (por.) (Parcel 001) is approximately 84 acres and includes the Pūlama Lānaʻi Nursery, community gardens for residents and vacant lands. TMK (2) 4–9–014:009 (por.) (Parcel 009) comprises approximately 25.65 acres and includes the island’s original power plant -- now demolished -- and a graded yard used to store shipping containers.

B. PROPOSED ACTION

The Hōkūao 201H Housing Project proposes construction of 150-single-family homes, with 76-homes exclusively for rent to households falling within the Department of Housing and Urban Development (HUD) low income guidelines, adjusted for Lānaʻi by the County of Maui Department of Housing and Human Concerns, and 74-homes to be rented at market rates. The project’s affordable units are proposed to remain affordable in perpetuity. The project also includes a 1-acre park, a 1,500-square-foot community center for use by the Lānaʻi community, and 60-parking stalls for intermittent parking (e.g., community events at the community center, guests visiting residents of the Hōkūao residential units, etc.). See **Appendix “A”**. Ninth and 12th Streets, both of which are currently dirt roads in the project area, will be improved as part of this project. See **Figure 3**.



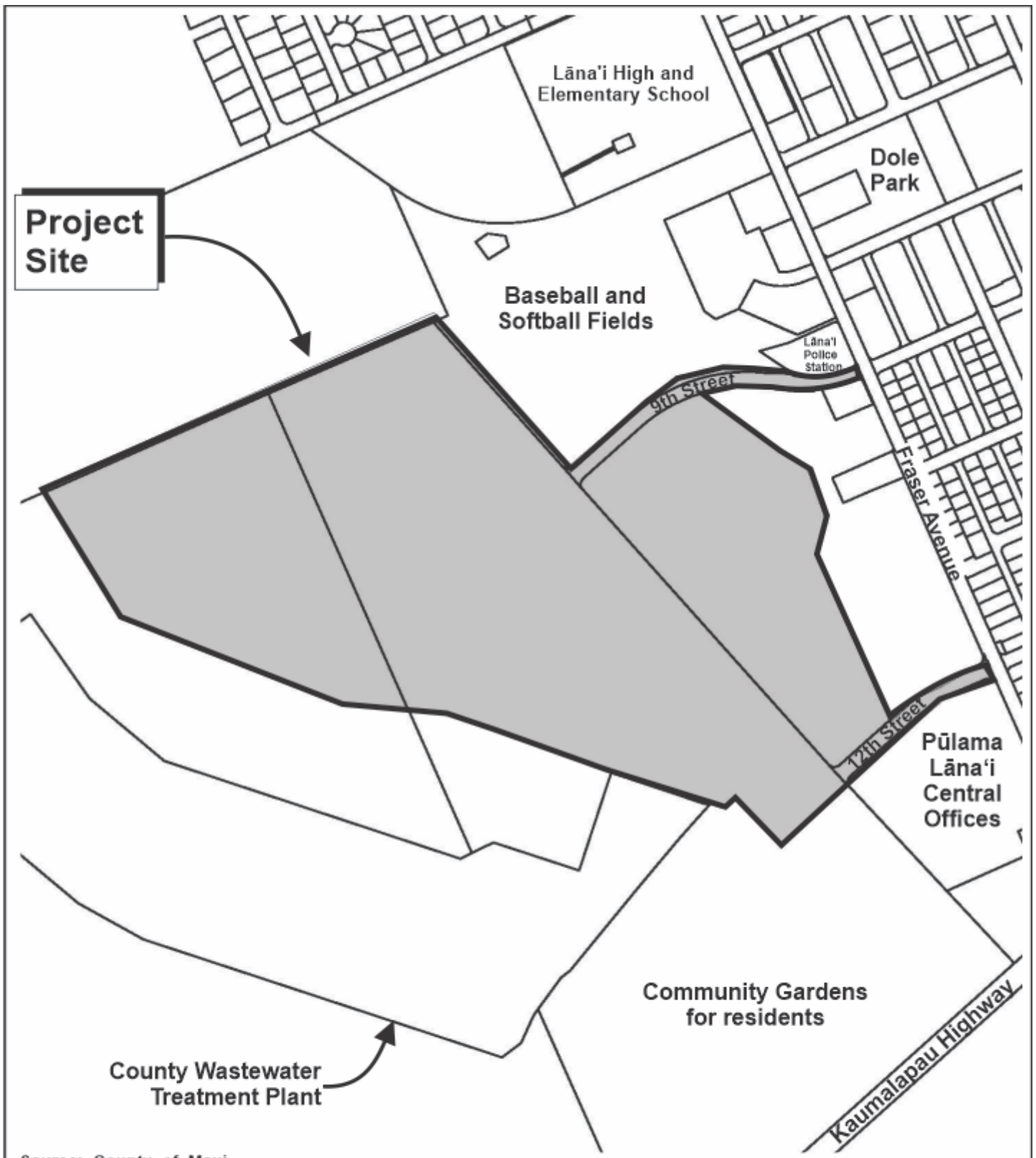
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Figure 1 Hōkuaō 201H Housing Project
Regional Location Map



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability Company doing business as Pūlama Lāna'i





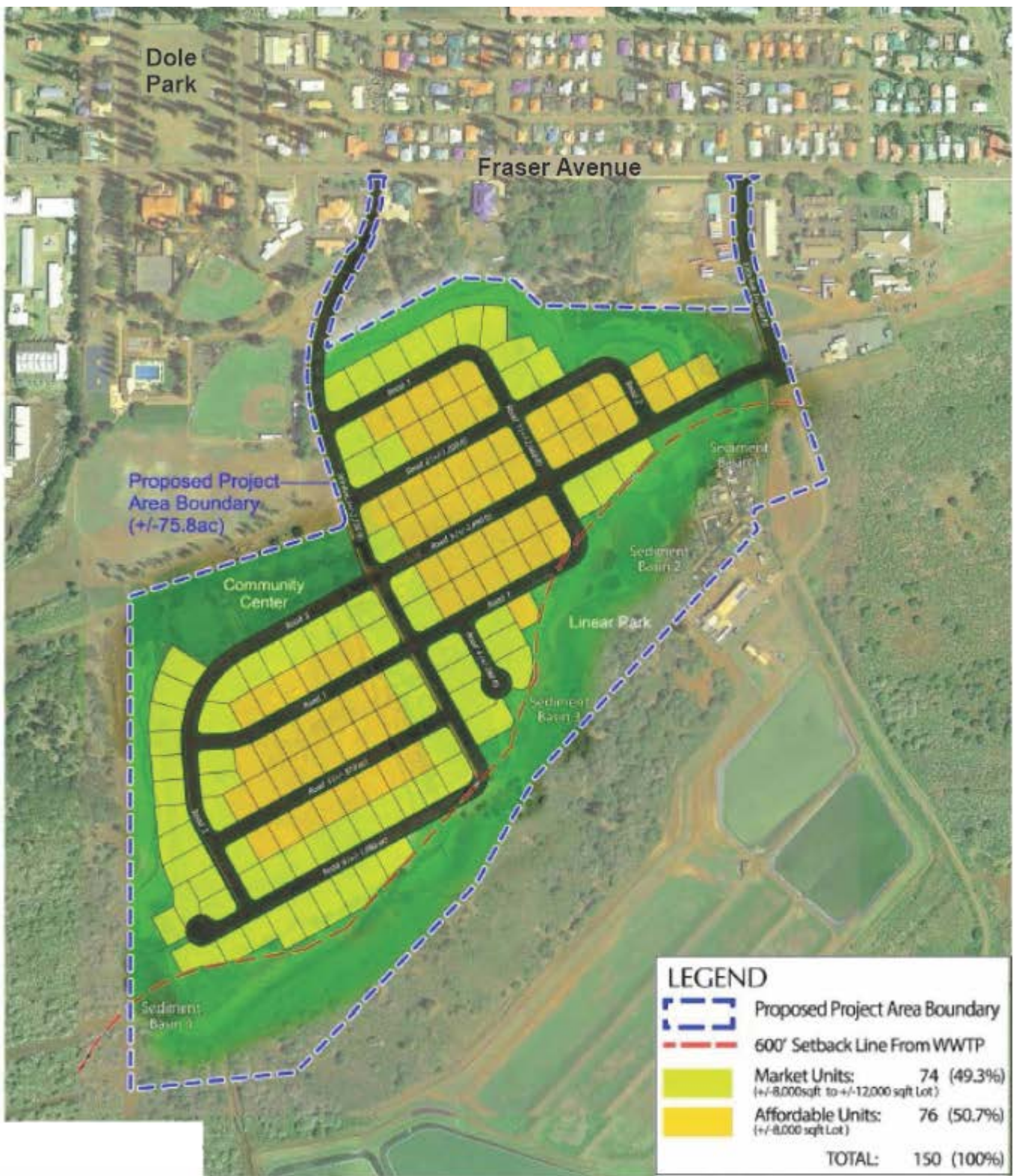
Source: County of Maui

Figure 2 Hōkūao 201H Housing Project Property Location Map



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability
Company doing business as Pūlama Lāna'i





Source: PBR Hawaii & Associates, Inc.

Figure 3 Hōkuaō 201H Housing Project
Conceptual Site Plan

NOT TO SCALE



The project's Draft EA included a summary of the proposed improvements, which noted that 135 2-bedroom units and 15 4-bedroom units were proposed. The 76 affordable units were proposed as 2-bedroom units, while the 74 market units would be a combination of 2-bedroom and 4-bedroom homes. However, due to recent substantial increases in construction costs, the project is proposing to utilize 2-bedroom homes for all units. The total number of units (150 units) and the unit counts for affordable and market units remain unchanged.

Adjustment of the unit size mix does not represent a material change in the proposed action. The analysis of impacts and mitigation measures associated with a development consisting of 150 2-bedroom units and a development consisting of 135 2-bedroom and 15 4-bedroom units is substantially the same, though it is recognized that a unit mix consisting entirely of 2-bedroom homes may have associated water and wastewater usage that is slightly lower than a unit mix that includes 15 4-bedroom units. Any difference in impacts and mitigation measures, however, would be negligible.

It is noted that the project's technical studies considered the impacts for a limited amount of the larger 4-bedroom homes as well as a greater number of total units (200 homes) than planned (150 homes).

The project site is designated "Urban" and "Agricultural" by the State Land Use Commission; "Park", "Open Space", "Mixed-Use Residential", and "Public/Quasi-Public" by the Lāna'i Community Plan; and "Interim", "Open Space", "Active Open Space", and "Agricultural" by Maui County Zoning. The project site is not located in the Special Management Area (SMA) of the island of Lāna'i.

C. CHAPTER 343, HAWAI'I REVISED STATUTES

The proposed project also involves improvements in the County right-of-way for 9th and 12th Streets as well as the relocation of an existing County of Maui, Department of Environmental Management sewerline. Use of County lands is a trigger for preparation of an Environmental Assessment (EA) pursuant to Chapter 343, Hawai'i Revised Statutes (HRS). As the proposed project is not able to meet the criteria for a Chapter 343, HRS exemption for affordable housing projects, an EA was prepared in support of the Section 201H application. As the Section 201H application will be the first discretionary approval sought for the project, the County of Maui, Department of Housing and Human Concerns (DHHC) was designated the Approving Agency for the Chapter 343, HRS EA.

D. SECTION 201H-38, HAWAI'I REVISED STATUTES

The Applicant proposes to seek a fast track affordable housing project approval from the Maui County Council pursuant to Section 201H-38, HRS. The Section 201H-38 approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning,

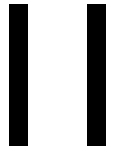
construction standards for subdivisions, development and improvement of land, and the construction of the units thereon provided that the project still meets the minimum requirements for health and safety. Among other exemptions, the Applicant will be seeking exemptions from Change in Zoning, Community Plan Amendment consistency, as well as waivers from design related requirements such as sidewalk widths and yard setbacks. Due to the project covering more than 15 acres, the Applicant will seek a District Boundary Amendment from the State Land Use Commission via the Section 201H-38, HRS process.

E. PROJECT TIME SCHEDULE AND COSTS

Construction of the proposed project will commence upon the Section 201H approval by the Maui County Council, approval of the 201H-38 HRS State District Boundary Amendment from the State Land Use Commission, and upon receipt of construction permit approvals. The project is anticipated to be completed within 10 years, subject to any significant delays that are not within the Applicant's control (e.g., global pandemic, etc.). The Applicant will be privately funding the project with assistance from the County on permitting and procedural requirements.



DESCRIPTION OF THE
EXISTING ENVIRONMENT,
POTENTIAL IMPACTS, AND
MITIGATION MEASURES



II. DESCRIPTION OF THE EXISTING ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION MEASURES

A. PHYSICAL SETTING

1. Surrounding Land Uses

a. Existing Conditions

The proposed project site covers portions of three neighboring parcels owned by Lanai Resorts, LLC, with most of the project located on former pineapple fields. Parcel 061 is a large parcel of approximately 16,124 acres that covers a significant portion of Lānaʻi Island and includes both undeveloped lands and most of the abandoned pineapple fields. Parcel 001 is approximately 84 acres and includes the Pūlama Lānaʻi Nursery, community gardens for residents and vacant lands. Parcel 009 comprises approximately 25.65 acres and includes the island's original power plant -- now demolished -- and a graded yard used to store shipping containers.

The project site is located near the Lānaʻi Police Station and Dole Park to the northeast and will connect to Lānaʻi City via 9th Street and 12th Street extensions, which intersect with Fraser Avenue. Pūlama Lānaʻi's Central Offices are located to the southeast of the project and the County Wastewater Treatment Plant is to the southwest.

b. Potential Impacts and Mitigation Measures

The proposed project is located adjacent to the existing urbanized areas of Lānaʻi. The proposed project is compatible with the surrounding existing residential uses of the area. In the context of surrounding land uses, the proposed project is not anticipated to have a significant adverse effect on the surrounding landscape. The proposed project will provide much needed affordable rental housing in an area central to commercial activity (e.g., businesses, markets, etc.) and community services (e.g., school, community center, churches, etc.).

2. Climate

a. Existing Conditions

Like most areas of Hawai'i, the climate of Lāna'i is relatively uniform year-round. The tropical latitude of Lāna'i, its position relative to storm tracts and the Pacific anticyclone, and the surrounding ocean combine to produce this stable climate. Variation in climate among different regions on Lāna'i is largely left to local terrain. Daily temperatures in the region range between an average low of 67.8 degrees and a high of 75.1 degrees Fahrenheit. Temperature data collected at the Lāna'i Airport station show that on average, January is the coolest month and August as the warmest month (County of Maui, Office of Economic Development, 2019). Recent rainfall gauge data was not available for Lāna'i Airport, however, past data shows that rainfall in the region is seasonal, with the wettest month being January and the driest month being July. Precipitation data for Lāna'i shows an average annual rainfall of 15.59 inches (County of Maui, Office of Economic Development, 2019).

b. Potential Impacts and Mitigation Measures

The proposed project involves the development of 150-single-family homes on approximately 76 acres of land. The project also includes a 1-acre park, a 1,500-square-foot community center for use by the Lāna'i community, and 60-parking stalls for use by the project residents. The proposed project will not adversely impact climatic conditions in and around the area.

3. Agricultural Lands

a. Existing Conditions

In 1977, the State of Hawai'i, Department of Agriculture developed a classification system to identify Agricultural Lands of Importance to the State of Hawai'i (ALISH), based primarily, though not exclusively, on soil characteristics of the underlying land. The three (3) classes of ALISH lands are "Prime", "Unique", and "Other Important" agricultural land, with the remaining non-classified lands termed "Unclassified". When utilized with modern farming methods, "Prime" agricultural lands have soil quality, growing season, and moisture supply needed to produce sustained crop yields economically; while "Unique" agricultural lands contain a combination of soil quality, growing season, and moisture supply to produce sustained yields of a specific crop. "Other Important" agricultural lands include those important agricultural lands that have not been rated as "Prime" or "Unique".

The project site is located on lands that are designated as “Unique” agricultural land by the ALISH map. See **Figure 4**.

Additionally, the University of Hawai‘i, Land Study Bureau (LSB) developed the Overall Productivity Rating, which classified soils according to five (5) levels, with “A” representing the class of highest productivity soils and “E” representing the lowest. The lands underlying the proposed project site are primarily rated “C”. See **Figure 5**.

CBRE Valuation and Advisory Services prepared an Agriculture Impact Assessment regarding the proposed Hōkūao 201-H Housing project to assess the affect the project will have, if any, on the agriculture land base and industry on the Island of Lāna‘i; complying with State of Hawai‘i guidelines associated with moving land within the State Land Use Agricultural District into another district. See **Appendix “B”**.

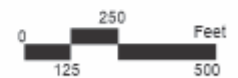
The agricultural, socio-economic conditions and public services and facilities in the region and in the project area, and the potential long-term socio-economic impacts of the proposed use were also reviewed. It should be noted that at the time the Agriculture Impact Assessment was written, the Hōkūao project was estimated to be approximately 50 acres. As the project has since developed to include retention ponds, an additional 26 acres was added to the project site. The additional 26 acres do not impact the analyses and conclusions in this section.

Once commonly referred to as the “Pineapple Island” the Dole Lāna‘i Plantation had sustained a cultivated area of some 13,000 acres, reportedly periodically reaching as high as 15,000 to 20,000 from its inception in the early 1920’s until active operations shut down in 1992. It is reported to have supplied up to 75 percent of the world’s pineapple crop at peak production.

The cultivation of pineapple began in Lāna‘i in 1910 by Charles and Louisa Gay with the first successfully crop. By 1917, the Gay family had a going-concern pineapple business focusing on lands near present-day Lāna‘i City. The crop was harvested and taken to Mānele Landing via truck for loading on boats to Maui for canning. The lack of infrastructure made the trip difficult resulting in the loss of much fruit due to bruising.



Figure 4 Hōkuaō 201H Housing Project
Agricultural Lands of Importance
to the State of Hawai'i Map



Prepared for: Lāna'i Resorts LLC, a Hawai'i Limited Liability Company doing business as Pūlama Lāna'i



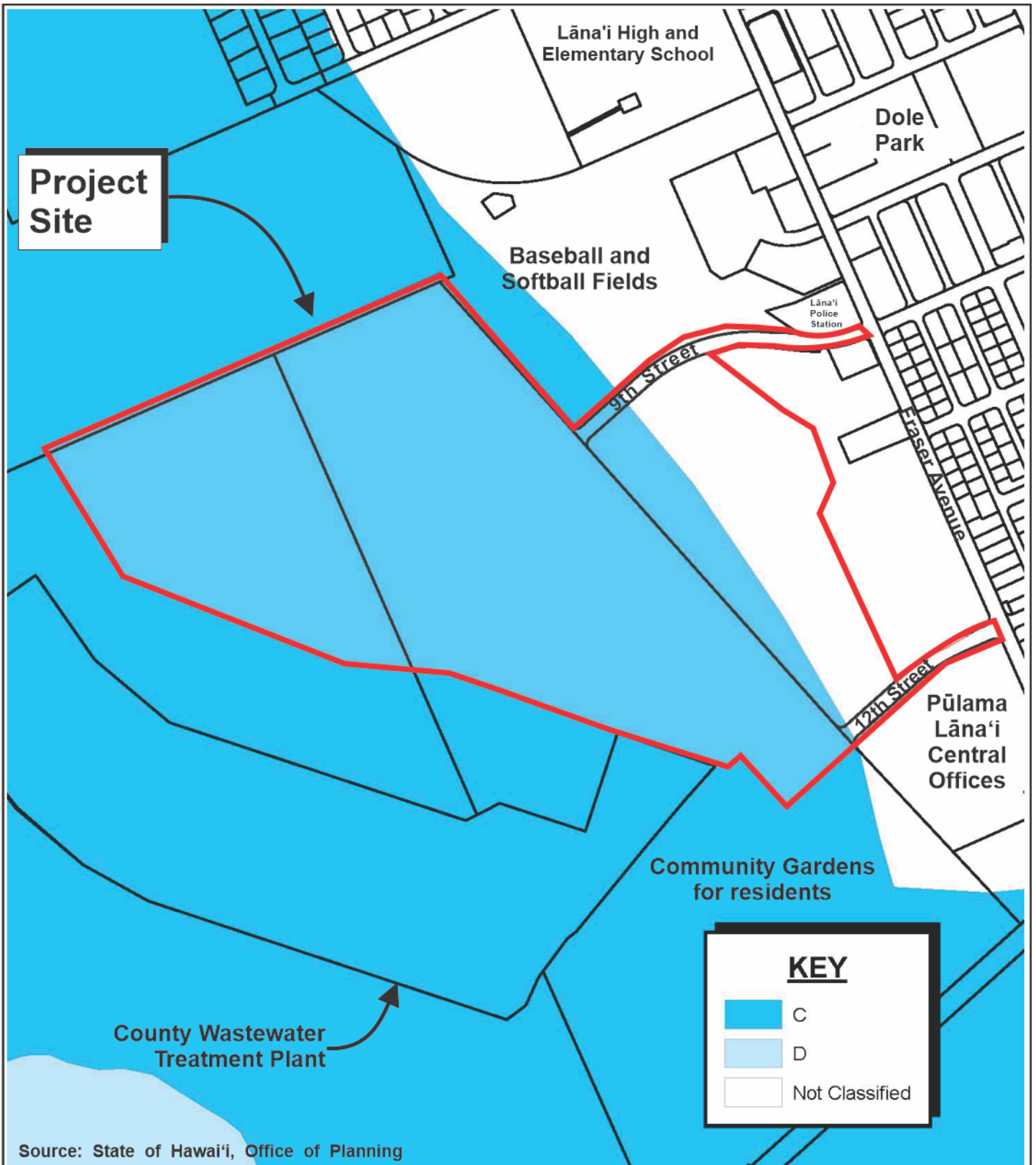
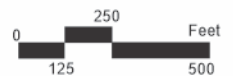


Figure 5 Hōkuaō 201H Housing Project
Land Study Bureau



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability Company doing business as Pūlama Lāna'i



In 1922, James Dole purchased much of Lānaʻi (which eventually became the Pūlama Lānaʻi lands). In 1923, the Dole Hawaiian Pineapple Company began operations of what would be the world's largest pineapple plantation. In 1985, David Murdock purchased Castle & Cooke, and began the evolution of company focus from pineapple cultivation to planning for new resort and residential development on Lānaʻi.

In 2012, Larry Ellison, Founder of Oracle Corporation, purchased 98-percent of Lānaʻi from Castle & Cooke, Inc; operations are under Lanai Resorts LLC. In July 2013, Lānaʻi Resorts began doing business as Pūlama Lānaʻi.

b. Potential Impacts and Mitigation Measures

The primary findings of the CBRE analysis are:

- A portion of the Hōkūao site was cultivated with pineapple as part of the larger Dole Lānaʻi Plantation for decades before production ceased in 1992.
- The site has lain fallow for 27 years with no plans forwarded for replanting with any crop.
- The site soils are primarily Lahaina and Waihuna Clay types which are suitable for pineapple, sugar cane, small scale truck farming or pasture uses, and wildlife habitats.
- Some of the classifications are specifically noted as being suitable for “homesites”.
- The site is classified on ALISH maps as “unique” which is defined as “land other than Prime Agricultural Land and is used for the production of specific high-value food crops”, a secondary classification to “prime”.
- The Hōkūao site represents an infinitesimal portion of the available agricultural lands on Lānaʻi, or about 0.38 percent of the 13,000+ acres of the previously cultivated pineapple plantation.
- The Hōkūao site is not a critical or unique agricultural site; its inclusion would not be critical to agricultural development elsewhere on the island or its exclusion would not diminish agricultural use elsewhere.

- There is no demonstrated market demand for agricultural use of the Hōkūao site and there is sufficient available supply to meet near to mid-term demand in existing, serviced agricultural subdivisions with some 105 cultivatable acres available for lease.
- The proposed subdivision will create more jobs and greater economic activity on the site than occurred under current agricultural use (0 jobs, \$0 economic activity) or historic pineapple use (maximum 5 jobs, \$350,000 economic activity).
- Agricultural use on the Hōkūao site could be in conflict with and/or deleterious to existing abutting residential use.
- There is an evident demand for the site being residentially-developed to house Lānaʻi households.

The project site consists of mostly abandoned pineapple fields and vacant lands. The proposed project will utilize the property for needed affordable rental housing. The proposed affordable housing development is considered an infill development, as the property is located adjacent to existing urbanized areas with other similar residential subdivisions, and nearby infrastructure systems. The proposed actions will occur on property that is currently agriculturally unproductive. As the lands are not currently actively cultivated, there are no anticipated adverse impacts to agriculturally productive lands as a result of the proposed action. Further, on the island of Lānaʻi, there are over 13,000 acres of available agricultural lands. As such, the use of 76 acres, or approximately 0.58 percent, of the available agricultural lands on Lānaʻi, and an even lesser fraction of approximately 0.38 percent of up to 20,000 potentially cultivatable acres for much needed affordable rental housing is not considered a substantial adverse impact in the context of the overall agricultural lands on the island. As such, significant adverse impacts to agricultural productivity are not anticipated as a result of the proposed project.

4. Topography and Soils Characteristics

a. Existing Conditions

Soils and vegetation adjacent to the roadway have been disturbed by previous flooding, grading, and sidecasting of asphalt and construction debris. The soils on the project area consist predominantly of silty clay and all are well drained (USDA 2014a). None of these soils series meet the definition of a hydric soil on the current Hydric Soil List (USDA 2014b).

The area is underlain by Pleistocene lava flows from the Lānaʻi shield volcano (Sherrod et al. 2007). Soils at the site are predominantly “Lahaina Silty Clay” types (LaA, 0 to 3 percent slopes; LaB, 3 to 7 percent slopes; and LaC, 7 to 15 percent slopes) and “Waihuna Clay” (WoA, 0 to 3 percent slopes) (NRCS 2013). See **Figure 6**. The area surrounding the Lānaʻi and Fraser Avenue culverts is underlain by Quaternary alluvial surficial deposits (Qa), and most of the area encumbered by the Lānaʻi City interceptor ditch is underlain by Lānaʻi basalts (QII) (Sherrod et al. 2007). See **Appendix “C”**.

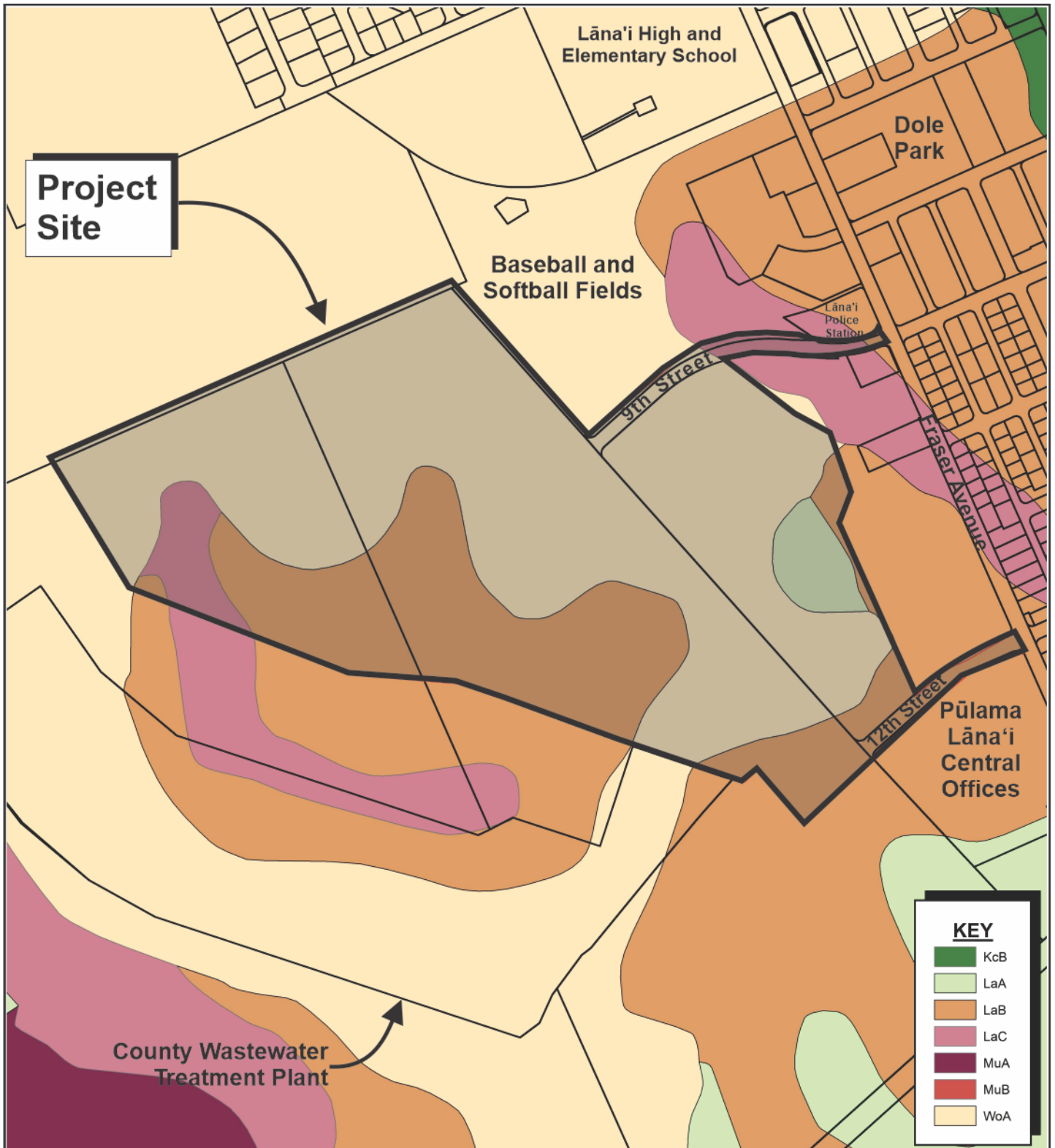
b. Potential Impacts and Mitigation Measures

Most of the project area's topography consists of flat to gently sloping open, patchy forest and scrub lands. An existing drainage swale on the western boundary of the site carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant with a 600-foot buffer between the closest lot and the wastewater facility boundary.

The proposed improvements will terrace the land to maintain characteristics which are very similar to the existing conditions. The general terrain of the developed condition will generally conform to the existing terrain, which slopes toward the south, and the tributary drainage area will remain the same as the existing.

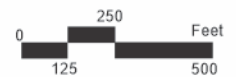
Grubbing and grading will be required for project implementation. The project will comply with Chapter 20.08, Soil Erosion and Sediment Control, of the Maui County Code. An erosion control plan will be prepared to minimize soil erosion from wind and rain, and, if applicable, a grading plan will be prepared and submitted for review and approval to the Development Services Administration, County Department of Public Works.

During the construction phase, Best Management Practices (BMPs) will be utilized, including temporary erosion control measures to minimize soil loss and erosion hazards. Upon completion of construction, adverse impacts to topography or soil characteristics are not anticipated.



Source: USDA Soil Survey Geographic Database and County of Maui, Department of Planning

Figure 6 Hōkuaō 201H Housing Project
Soil Classification Map



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability Company doing business as Pūlama Lāna'i



5. **Flood, Tsunami Hazards and Sea Level Rise**

a. **Existing Conditions**

As indicated by the Flood Insurance Rate Map for the County of Maui, the project site is located within Zone X. The Zone X designation corresponds to areas of minimal flood hazard, which are the areas outside the Special Flood Hazard Area and higher than the elevation of the 0.2-percent-annual-chance flood. See **Figure 7**.

The project site is located approximately 4.3 miles inland from the western shoreline and is not within the tsunami inundation zone. Additionally, it is noted that the proposed improvements are located outside of the projected 3.2-ft. sea level rise hazard area as identified in the Hawai'i Sea Level Rise Vulnerability and Adaptation Report published in 2017 by the Hawai'i Climate Change Mitigation and Adaptation Commission.

b. **Potential Impacts and Mitigation Measures**

Absence from flood risk, obviates the need for flood mitigation measures. The proposed project is intended to be beneficial as the proposed drainage improvements will provide protection to nearby properties from ongoing erosion and flooding due to severe weather events. The improvements are also located beyond the projected 3.2-ft. sea level rise hazard area for the property. As such, the project is not anticipated to be affected by flood and tsunami hazards.

6. **Streams and Wetlands**

a. **Existing Conditions**

Although historical evidence suggests the existence of perennial streams, no surface water resources currently exist on the island. There are also no wetlands located on or in the immediate vicinity of the proposed project site.

b. **Potential Impacts and Mitigation Measures**

During the short term, construction Best Management Practices (BMPs) will be carried out to ensure the proposed project will not adversely impact adjacent and downstream properties. Dust control fences and temporary drainage diversion channels will be constructed to prevent fugitive dust and stormwater runoff from entering adjacent properties. In the long term, the

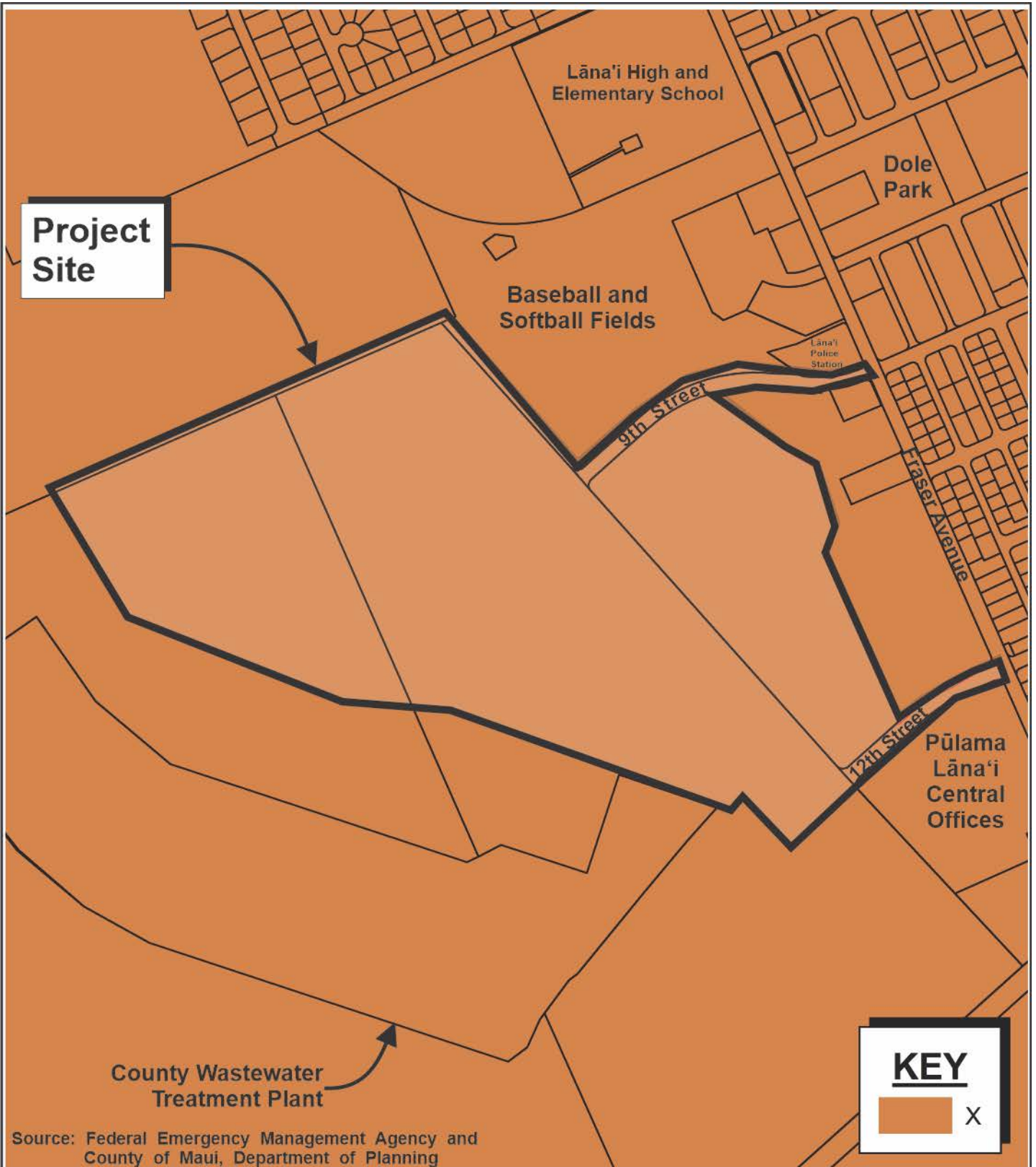
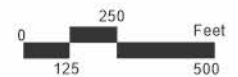


Figure 7 Hōkuaō 201H Housing Project
Flood Insurance Rate Map



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability Company doing business as Pūlama Lāna'i



proposed project is not anticipated to adversely impact adjacent properties, streams or wetlands in the vicinity of the project site.

7. **Flora and Fauna**

a. **Existing Conditions**

The analysis noted the occurrence of terrestrial plants and wildlife resources in a portion of Lānaʻi City, Hawaiʻi associated with a proposed action to establish a site plan for new homes. Cardno was tasked with conducting biological surveys and preparing a report of findings to address the results from this and previous surveys. See **Appendix “C”**.

The study area lies on the margin between developed portions of Lānaʻi City and former commercial pineapple fields. The site encompasses fallow pineapple fields, tree lines, graded weedy lots with vehicle tracks/dirt roads, an electrical power transfer station, stockpiled soil, green waste, construction debris, a plant nursery, and a community garden where chickens, pigs, and other livestock are maintained.

Terrestrial wildlife and vegetation surveys were conducted by biologists John Ford and Maya LeGrande. Prior to conducting field work, the biologists reviewed existing scientific literature, previously prepared environmental compliance documents, biological survey reports, topographic maps and images, and engineering drawings relevant to the proposed project, including previous surveys in the vicinity of the project by Bruner (2000), Char (2000), Guinther (2008), Hobdy (2008), ICF International (2013, 2014, and 2015), and Nagata (1986, 1990, and 1991).

All observed plant species were documented. Plant associations and distribution, disturbances, topography, substrate types, exposure, drainage, and related factors were noted.

Birds were identified visually with binoculars as well as by their vocalizations.

Observations of mammals, amphibians, reptiles, and insects were made incidental to the avian surveys and related surveys of vegetation. Visual observations of animals, animal vocalizations, tracks, and scat were tallied. No effort was made to develop quantitative estimates of animal populations within the survey areas.

Native plant habitats within the proposed project area have been highly modified by human activities, including agricultural activities, road building,

grading, residential construction, and the intentional and accidental introduction of alien species. The overwhelming abundance of non-native plant species throughout the project area is in direct correlation to disturbance over the last several hundred years.

The site consists largely of undeveloped lands and encompasses a commercial plant nursery and community gardens. A total of 156 plant species were observed within the proposed project area. One hundred fifty five (155) species are alien (introduced) and 3 are native (two indigenous and one endemic).

The undeveloped land to the west of the community gardens and to the north of the existing sewage treatment ponds is dominated by a mix of sourgrass (*Digitaria insularis*) and golden crown-beard (*Verbesina encelioides*) along with trees including Christmas berry (*Schinus terebinthifolius*), Formosa koa (*Acacia confusa*), and koa haole (*Leucaena leucocephala*).

Other weedy species observed scattered throughout the area included lantana (*Lantana camara*), apple of Sodom (*Solanum linnaeanum*), jimson weed (*Datura stramonium*), tree tobacco (*Nicotiana glauca*), balloon plant (*Asclepias physocarpa*), spiny amaranth (*Amaranthus spinosus*), and Guinea grass (*Panicum maximum*).

Two (2) native plant species commonly found within the undeveloped lands, included the indigenous 'uhaloa (*Waltheria indica*), which was scattered along existing dirt roadways, and a single endemic koa (*Acacia koa*) tree that was observed near the center of the survey area. Sections near the southern boundary of the survey area were colonized by a nearly impenetrable forest of Formosa koa and Christmas berry with Guinea grass understory.

The eastern section of the undeveloped lands lies just off Fraser Avenue. Ironwood (*Casuarina equisetifolia*) is the dominant tree species in the area with a thick understory of matted ironwood needles where little else grows.

Species observed along the edges of the forest include Guinea grass, balloon plant, lantana, spiny amaranth, prickly lettuce (*Lactuca serriola*), popolo (*Solanum americanum*), and Jamaican vervain (*Stachytarpheta jamaicensis*). Other tree species include African tulip (*Spathodea campanulata*), Chinese banyan (*Ficus microcarpa*), Formosa koa, and Christmas berry.

The plant nursery is located at the center of the overall survey area and is dominated by ornamental species. These species are not included in the overall species list so as to not skew the naturalized species data for the overall survey area. Weedy and/or naturalized species noted along the periphery of the nursery were included in the species list. These included laua'e (*Phymatosorus grossus*), Chinese banyan, African tulip, pigweed (*Portulaca oleracea*), and Guinea grass.

Many large ornamental trees are located within the nursery and have either become established by growing into the ground from their containers or appear to have been intentionally planted. Established tree species include Cook Island pines (*Araucaria columnaris*), orchid tree (*Bauhinia sp.*), kukui (*Aleurites moluccana*), coconut (*Cocos nucifera*), variegated hau (*Hibiscus tiliaceus*), magnolia, mango (*Mangifera indica*), jacaranda (*Jacaranda mimosifolia*), puakeniken, and Moreton Bay fig (*Ficus macrophylla*).

A community garden lies to the south east of the company nursery. It is composed of numerous small lots subdivided by makeshift fences and corrugated metal sheets and contains various structures that house farm animals such as goats and chickens. Many of the parcels have fruits and vegetables planted including papaya, banana, avocado, malangay, citrus species, and mulberry. The majority of the area is bare dirt with few weedy plants species growing within the parcels. The periphery of this area is dominated by Guinea grass, African tulip trees, and indigo (*Indigofera suffruticosa*).

During the study, thirteen (13) species of birds were observed and/or heard during four 8-minute point counts at representative locations within the proposed project area. Four (4) additional species of birds were observed incidentally within the proposed project area, including the rock pigeon (*Columba livia*), cattle egret (*Bulbulcus ibis*), wild turkey (*Meleagris gallopavo*), and gray francolin (*Francolinus pondicerianus*).

The most conspicuous species observed and/or heard throughout the project area during this survey was the common mynah (*Acridotheres tristis*). Species commonly observed/heard within densely vegetated areas include common mynahs, Japanese white-eye (*Zosterops japonicus*), Japanese bush warbler (*Horornis diphone*), and Northern cardinal (*Cardinalis cardinalis*).

In open and edge habitats, the most conspicuous species of birds observed/heard included common mynah (*Acridotheres tristis*), zebra dove

(*Geopelia striata*), and house sparrow (*Passer domesticus*). Wild turkey (*Meleagris gallopavo*) were occasionally seen around edge habitats.

Previous studies within the same general vicinity reported finding some species not seen, including the Pacific golden plover (*Pluvialis fulva*), wandering tattler (*Tringa incana*), ruddy turnstone (*Arenaria interpres*), sanderling (*Calidris alba*), red-crested cardinal (*Paroaria coronata*), barn owl (*Tyto alba*), Hawaiian short-eared owl or pueo (*Asio flammeus sandwichensis*), white-rumped shama (*Copsychus malabaricus*), northern mockingbird (*Mimus polyglottos*), and Java sparrow (*Padda oryzivora*), and nutmeg manikin (*Lonchura punctulata*).

All but three of the avian species observed within the study area were naturalized alien species. These findings are consistent with previous biological surveys in the vicinity of Lānaʻi City.

b. Potential Impacts and Mitigation Measures

Because the vegetation in this project area and in the surrounding urban neighborhoods is dominated by common non-native plants, and because there are no rare or protected native species in or near this area, there is little of botanical concern with regard to this project.

None of the project area is encumbered by proposed or designated critical habitat for endangered species (U.S. Fish and Wildlife Service 2013). Refer to **Appendix “C”**.

No listed threatened or endangered species of birds were found within the boundaries of the proposed project; however, should any night work occur for the project, outdoor lights will be shielded and directed downwards to avoid upward directed accent lighting in order to minimize impacts to seabirds.

No listed endangered Hawaiian hoary bats, or ‘ope‘ape‘a (*Lasiurus cinereus semotus*) were observed. Their populations on Lānaʻi are believed to be very low (Tetra Tech EC 2004), and scientists have speculated that bats found on Lānaʻi are probably itinerants from neighboring islands with higher elevations. Refer to **Appendix “C”**.

Although endangered Hawaiian petrels or ‘ua‘u (*Pterodroma sandwichensis*) do not nest within or near the study area, a breeding colony was found in 2006 (Tetra Tech 2008) at Lānaihale approximately three (3) miles to the east south east of the center of the proposed development.

'Ua'u attend the colony at night and nest in burrows in the ground, under dense uluhe ferns (Tetra Tech 2008). In studies conducted in 2007, Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) biologists found that petrels fledged from Lānaihale colony between early November and December. Fledgling petrels are known to be confused by bright lights and have collided with man-made structures (DOFAW 2005). Refer to **Appendix "C"**.

There is no federally delineated Critical Habitat for any species present on or adjacent to the project area. Thus, the proposed actions will not result in impacts to federally designated Critical Habitat. The nature of the land and its present and historical disturbances very much limit the natural botanical resources anticipated to occur here. The results of the Terrestrial, Vegetation and Wildlife surveys substantiate this prediction. The rare frequency of native plant species is an indication that because of constant disturbances (habitat modification, invasive plant species, feral ungulates), only species adapted to such conditions can survive, with few exceptions.

Care will be taken during construction to ensure that noxious weeds or other invasive alien species are not accidentally introduced to the construction site. If high-pressure water guns are used, unnecessary runoff should be avoided by applying only as much water as is needed.

All materials imported to the project site, including gravel, soil, rock, and sand, should be free of invasive plants. Graded sites should be re-vegetated as soon as practicable with plants from Lāna'i. Imported plants used in landscaping should first be quarantined in an enclosed location away from the project site.

All imported plants should be inspected to ensure that they are free from invasive species that could arrive inadvertently, such as coqui frogs (*Eleutherodactylus coqui*), little fire ants (*Wasmannia auropunctata*), and Miconia (*Miconia calvescens*) seedlings. A list of invasive plant and animal species of particular concern in Hawai'i may be found on the Hawai'i Invasive Species Council website: <http://dlnr.hawaii.gov/hisc/info/invasive-species-profiles/>.

If seed mixtures are to be applied by hydro-seeding and hydro-mulching, they should be free of non-native weeds. Any species of plants other than those intended to be in the hydro-seed/hydro-mulch should be removed. In particular, plant species that are not known to occur on Lāna'i and those that are actively being controlled on Lāna'i should be removed.

To the maximum extent possible, landscaping would be done with indigenous and endemic flora which are known from elevations and climate regimes on Lānaʻi and/or elsewhere in Hawaiʻi similar to that of the proposed project area. It would be beneficial to retain as many of these large mature trees within the study area as possible during the construction of the housing.

Industry-standard BMPs should be employed when working within drainage ways to minimize the risk of soil erosion into adjacent drainage ways. These may include but not be limited to the use of silt curtains, coir logs and/or blankets, sediment traps, slope and inlet protection, temporary stabilization, and dust control.

Maintenance of a 600 foot buffer from the existing sewage treatment ponds should be sufficient to prevent disturbance of listed endangered Hawaiian stilt and coot, and should not interfere with seasonal foraging by migratory shorebirds and waterfowl at the ponds. Additional fencing associated with the proposed housing development will help deter disturbance of the water birds at the sewage ponds by humans and house pets.

The project activity will comply with all County, State, and Federal laws and rules. The project will also follow Cardno's recommended mitigation measures to minimize impacts. As such, the project will not have a significant negative impact on any native botanical (flora or fauna) resources.

8. Archaeological Resources

a. Existing Conditions

Thomas Dye and Kepā Maly prepared an Archaeological Inventory Survey (AIS) (Log No.: 2019.00221) for the proposed Hōkūao 201H Housing Project at Lānaʻi City in 2018. Dye was assisted in the field by Zeth Kipi and Taz Del Rosario. The backhoe used for test excavations was operated by Terrence Sarme. See **Appendix "D"**.

On August 14, 2020, the State Historic Preservation Division (SHPD) accepted the AIS and the Field Inspection End-of-Fieldwork Summary Report with conditions and requested that Pūlama Lānaʻi submit an Archaeological Monitoring Plan (Log No. 2020.00018, Doc. No. 2008IK01, Archaeology, Architecture). See **Appendix "D-1"**.

Historical information indicates that the entire proposed Hōkūao 201H Housing Project area has been modified by the introduction of pineapple

agriculture to the island and the founding of Lānaʻi City in the 1920s. Most of the project area, except for the sloping lands adjacent to Fraser Avenue, can be characterized as abandoned pineapple fields. An aerial photograph from the 1920s shows the sloping lands adjacent to Fraser Avenue recently worked by heavy machinery.

Only one (1) historic property was assigned a State Inventory of Historic Places site number, Site 50–40–98–6649, a historic-era culvert head wall located just outside the northern boundary of the proposed project. The culvert was determined eligible for listing on the Hawaiʻi Register of Historic Places under Criterion D, “because of the potential to yield information important for understanding the history of the region”. However, no further historic preservation work for the site was recommended. Refer to **Appendix “D-1”**.

Based on this historical information, potentially significant surface structural remains were not anticipated in the proposed Hōkūao 201H Housing Project area.

In this situation, archaeological interest in surface survey turns to the discovery and identification of secondarily deposited artifact scatters that might indicate locations of past human activity and the presence of significant buried deposits. Archaeological survey of a 100–150 ft. wide corridor through the proposed Hōkūao 201H Housing Project area in 1993, shortly after the area went out of pineapple cultivation and surface visibility was excellent, did not observe any artifact scatters.

Now, more than two decades since the pineapple fields were abandoned, fallow growth of grasses, herbs, lantana, and Christmas berry trees is vigorous, which makes surface visibility poor throughout the proposed Hōkūao 201H Housing Project area.

Pedestrian survey of the project area was completed at a low level of intensity on July 18, 2016. Two north–south transects of the western portion of the project area, west of the Pūlama Lānaʻi Nursery and the Community Gardens, were completed. Two north–south transects of the eastern portion of the project area, one on the slope adjacent to Fraser Avenue and the other on the flatland at the base of the slope, were also completed. In these two areas, vigorous vegetation growth made surface visibility poor.

Open plots within the Pūlama Lānaʻi Nursery were investigated for the presence or absence of secondarily deposited cultural material. The northern portion of the project area, north of the Pūlama Lānaʻi Nursery, is

the site of ongoing green waste disposal and propane gas storage. It was not traversed during the pedestrian survey.

The bulk of the inventory survey effort was directed to test excavation using a backhoe. The test excavations were designed to determine whether or not the proposed Hōkūāo 201H Housing Project area included places where potentially significant cultural deposits might be buried.

A backhoe with a blade fitted to the bucket, rather than teeth, excavated 25 test trenches typically 2 meters (m) long, 0.8 m wide, and more than 1 m deep. In each case, excavation ended within the natural subsoil. These excavations were carried out over a period of two and a half days on July 19–21, 2016.

Each trench was photographed and described. A sample was taken of each sediment layer exposed in the excavations and returned to the laboratory for standard description using a Munsell soil color chart and a flowchart to determine texture by feel.

Test excavation locations were determined with a handheld Global Positioning System (GPS) rover with post-processing for differential correction. Differentially corrected GPS points typically achieved horizontal precision less than 2 m.

They were plotted on publicly available base maps using geographic information system software. Because no sites were found, a method to determine site boundaries was not employed.

The collections made during the archaeological inventory survey were limited to soil sediment samples, which were analyzed and discarded.

The following is a summary listing of some of the prior uses of the site:

- The project area was once part of the Lānaʻi Ranch lands;
- The project area was taken over by the pineapple industry which ended in 1992;
- The project area is currently overgrown with tall grasses, shrubs and trees;
- The now defunct Power Plant was previously operating in a section of the project area; it has been demolished;

- The Company Nursery and Community Gardens will be relocated; the majority of the gardens houses fighting chickens;
- A kukui tree in the project area may have been harvested by an interviewee's father so there is an interest in preserving it;
- There are two 'historic' structures that were relocated to the project area, but are currently neglected and in disrepair surrounded by overgrown vegetation;
- A row of historic Cook pine trees were planted as wind break and now mauka of the Community Gardens

Results of Present Archaeological Analysis:

The AIS included surface survey and test excavations with a backhoe. Three potentially significant historic properties were identified during the surface survey, all of which are historic-era artifacts that were transported into the project area for preservation. Two (2) wood-frame buildings from the Kō'ele School complex, in poor condition a decade ago, have now been overgrown by vegetation and lack the integrity of condition to be listed on the Hawai'i Register of Historic Places.

A pineapple harvester, "Machine 1," in the possession of the Lāna'i Culture & Heritage Center, possesses sufficient integrity to be significant under Criterion "A" due to its association with the commercial pineapple fields that for seven decades were the primary economic pursuit on the island.

At the time of the AIS, "Machine 1" was situated on the Hōkūao site and it was recommended that it be moved away from the proposed Hōkūao 201H Housing Project area prior to any construction activities and that funds for its restoration and interpretive display be pursued.

No potentially significant historic properties were found in the test excavations. The plow zone with pieces of black plastic mulch that was found throughout the western portion of the proposed Hōkūao 201H Housing Project area was actively farmed into the 1990s and does not meet the age criterion for a historic property. The negative results of the test excavations are typical for the former pineapple fields.

b. Potential Impacts and Mitigation Measures

The AIS included surface survey and test excavations with a backhoe. Three potentially significant historic properties were identified during the

surface survey, all of which are historic-era artifacts that were transported into the project area for preservation. Two wood-frame buildings from the Kō'ele School complex, in poor condition a decade ago, have now been overgrown by vegetation and lack the integrity of condition to be listed on the Hawai'i Register of Historic Places.

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The AIS recommended that "Machine 1" should be moved away from the proposed Hōkūao 201H Housing Project at Lāna'i City prior to any construction activities and that funds for its restoration and interpretive display be pursued.

No potentially significant historic properties were found in the test excavations. The plow zone with pieces of black plastic mulch that was found throughout the western portion of the proposed Hōkūao 201H Housing Project area was actively farmed into the 1990s and does not meet the age criterion for a historic property. The negative results of the test excavations are typical for the former pineapple fields.

The property owner will comply with all applicable Federal, State, and County laws and rules regarding the treatment of archaeological and historic sites.

In addition, mitigation measures include monitoring during construction and establishing a visible 10 ft-radius buffer around the perimeter of the historic culvert headwall (SIHP #-6649). These measures will mitigate potentially adverse effects of the residential development of Hōkūao 201H Housing project. Subsequent to mitigation, the project will have a less than significant impact.

Further, per consultation with the SHPD, the Applicant submitted an Archaeological Monitoring Plan for review and approval by the SHPD. See **Appendix "D-2"**. Said Monitoring Plan would be adhered to during ground-altering activities at the project site.

9. Cultural Resources

a. Existing Conditions

Maria Orr prepared a Cultural Impact Assessment (CIA) for the proposed project site. See **Appendix “E”**. No legendary/mythical entities or ali'i nui were directly connected to the project area, but two (2) post-contact konohiki were mentioned in the literature. No Contact or Historic people were directly connected to the project area, other than in relation to lands used in the brief Mormon colonizing period, the ranching era, and the pineapple industry.

Various resource use patterns are often physically evident as well as recounted in the literature. The physical evidence remains in the form of landmarks, stone ruins that are fortunate to have been preserved relatively intact and cultural material remains (surface and sub-surface). Clues regarding function and use can sometimes be extrapolated from the stories, songs, chants, and ethno-historical observations that were also fortunately recorded or passed on; and the continuing cultural practices of today's people of Kamoku.

Ancient Use:

There is no current evidence of ancient use in the project area although it can be assumed that it was once part of the ancient ahupua'a system.

Post-Contact/Historic Land Use:

The following is a summary listing of some of the prior uses of the site:

- The project area was once part of the Lāna'i Ranch lands.
- The project area was taken over by the pineapple industry which ended in 1992.
- The project area is currently overgrown with tall grasses, shrubs, and trees.
- The now defunct Power Plant was previously operating in a section of the project area; it has been demolished.
- The Company Nursery and Community Gardens will be relocated; the majority of the gardens houses fighting chickens.
- A kukui tree in the project area may have been harvested by an interviewee's father; there is an interest in preserving it.

- There are two (2) “historic” structures that were relocated to the project area, but both are currently neglected and in disrepair surrounded by overgrown vegetation.
- A row of historic Cook pine trees were planted as a wind break and now sit mauka of the Community Gardens.

b. Potential Impacts and Mitigation Measures

According to the Environmental Council (EC) Guidelines, the types of cultural practices and beliefs subject to assessment may include subsistence, commercial, residential, agricultural, access-related, recreational, religious, and spiritual customs. The following actions were taken to meet the EC Guidelines Criteria for conducting this CIA based on the statement of work:

- Conduct historical and other culturally related documentary research.

Documentary research, particularly on identifying traditional and cultural uses of the area, was completed. Much of what is known about the traditional and cultural uses of the area comes from written records that tell of its prehistory (e.g., mo’olelo and 19th century ethnographic works), the stories associated with early coastal and upland area uses by early Hawaiians, and scientific studies (i.e., archaeological, botanical, geological, and biological).

- Identify individuals with knowledge of the types of cultural resources, practices, and beliefs found within the broad geographical area (e.g., district or ahupua’a), or with knowledge of the area potentially affected by the proposed action (e.g. past/current oral histories).

The project lands have been in continual use since ancient times, however, not in exclusive kanaka maoli use since Contact. The interviewees were selected because of their use and knowledge of the project area.

- Identify and describe the cultural resources, practices, and beliefs located within the potentially affected area.

Archival research in the Cultural and Historical Background Review and ethnographic research (Ethnographic Data Review and Analysis) produces the data utilized to identify and describe the cultural resources, practices, and beliefs located within the potentially affected area in the Summary of Findings above. There were no identified cultural resources or practices connected to the project area.

- Assess the impact of the proposed action on the cultural resources, practices, and beliefs identified.

The CIA concluded that as there were no cultural resources, practices, and beliefs identified in or connected to the proposed project area, the proposed project will not create any cultural impacts. Refer to **Appendix “E”**.

10. Air Quality

a. Existing Conditions

An Air Quality Study for the Proposed Hōkūao 201H Housing Project was prepared by B. D. Neal & Associates and finalized in January 2019. See **Appendix “F”**. The ambient air quality of the project site is typically clean and subject to the prevailing on shore winds. There are no major sources of air pollution in the immediate vicinity such as agricultural burning, manufacturing plants, and incinerators.

Potential impacts on the project could occur from the nearby Lāna‘i City Wastewater Treatment Plant. Wastewater treatment plants generally are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds. The types and amounts of compounds in the air are generally not considered hazardous to human health, but when they occur at sufficiently high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses. There were no measurable concentrations at any location along the plant perimeters. Further, there was no noticeable odor present at any location along the plant perimeters.

Short-term impacts from fugitive dust will likely occur during the project construction phases. To a lesser extent, exhaust emissions from stationary and mobile construction equipment, from the disruption of traffic, and from workers' vehicles may also affect air quality during the period of construction.

After construction, motor vehicles coming to and from the proposed development will result in a long term increase in air pollution emissions in the project area.

To assess the impact of emissions from these vehicles, a computer modeling study was undertaken to estimate current ambient concentrations of carbon monoxide at intersections in the project vicinity and to predict future levels both with and without the proposed project. During worst-case

conditions, model results indicated that present 1-hour and 8-hour carbon monoxide concentrations are well within both the state and the national ambient air quality standards.

In approximately 10-years (estimated build-out) without the project, carbon monoxide concentrations were predicted to remain unchanged. With the project, after full build-out, carbon monoxide concentrations compared to the without-project case were projected to remain nearly unchanged or increase very slightly, and worst-case concentrations should remain well within air quality standards.

Project-related traffic should have no measurable impact on air quality in the project area. Implementing any mitigation measures for traffic-related air quality impacts is probably unnecessary and unwarranted.

Winds at the site can be expected to be predominantly trade winds from the northeast with speeds in the 10 to 25 mph range. The prevalent “fresh” winds could potentially promote volatilization at the plant, but they will also tend to enhance the dilution and dispersion of the emissions at downwind locations. With trade wind conditions, which occur about 80 percent of the time, emissions will be carried toward locations to the southwest. The proposed project will be situated to the northeast of the wastewater treatment facility and thus will be upwind most of the time.

From an atmospheric dispersion perspective, it is probable that the worst case for offsite odor impacts will occur during nighttime situations when the trade winds are weak or absent and dispersion conditions are poor. Occasional light winds from the south or southwest, which occur less than about 1 percent of the time, will tend to carry airflow over the wastewater treatment facility and toward the proposed project.

On October 26, 2016, representative of B. D. Neal & Associates made a site visit to the Lānaʻi City Wastewater Treatment Plant, and the entire perimeters of both the main plant and the auxiliary facility were surveyed using a Jerome Model 631-X portable hydrogen sulfide analyzer. The Jerome Model 631-X is a very sensitive instrument and capable of measuring ambient concentrations of hydrogen sulfide as low as 0.003 ppm. (Hydrogen sulfide smells like rotten eggs at low concentration levels in the air and at high concentration levels, it has a sickening sweet odor.)

Wind conditions during the survey were typical moderate trade winds from the northeast at about 10 to 15 mph. Hydrogen sulfide measurements were collected during mid-morning all along the plant perimeters, which included both upwind and downwind locations.

b. Potential Impacts and Mitigation Measures

In summary, the Air Quality Study found that there were no measurable hydrogen sulfide concentrations at any location along the wastewater treatment plant perimeters, i.e., the Jerome analyzer continuously displayed less than 0.003 ppm. Further, there was no noticeable odor present at any location along the plant perimeters.

The B. D. Neal & Associates Air Quality Study suggested, “While existing conditions suggest that offsite odor nuisance is not an issue, it may be prudent for the proposed project to maintain a buffer distance of at least 300 to 600 feet from the wastewater treatment plant boundary.”

In response to this suggestion, the Hōkūao project was purposefully placed 600 feet from the wastewater treatment facility. The project is not anticipated to have a significant adverse impact on air quality or climate.

Best management practices that include performing construction-related activities in strict compliance with all applicable air regulations will mitigate any temporary impacts. Contractors will be required to comply with Hawai‘i Administrative Rules, Chapter 11-60.1, “Air Pollution Control.”

It should be noted that at the time the Air Quality Study was written, the Hōkūao project was intended to be a 200-unit housing development. Since then, the unit count has decreased to a 150-unit 201H housing development, nonetheless the footprint of the development has remained the same. The estimated long term air pollution should be lower, and the recommendations proposed remain valid.

11. Greenhouse Gas Considerations

a. Existing Conditions

Hawai‘i Greenhouse Gas Emissions Report for 2016 was prepared for the State Department of Health in December 2019. The report noted the State’s information analysis and efforts to reduce greenhouse gas emissions. Greenhouse gases (GHG) (carbon dioxide, methane, nitrous oxide, and fluorinated gases) trap heat in the earth’s atmosphere. In the context of climate and ocean warming, increases in levels of atmospheric GHG have been attributed to human activity (IPCC, 2017). Within the State of Hawai‘i, the energy sector (including fossil fuel burning to produce electricity, transportation, waste incineration, and natural gas systems) is identified as the source of 89.7 percent of GHG emissions (Hawai‘i Department of Health, 2019). Other sources of GHG emissions include

industrial facilities, agriculture and forestry, and waste treatment, such as landfills, composting, and wastewater treatment.

The Federal Greenhouse Gas Reporting Program (40 CFR Part 98) requires mandatory reporting of GHG emissions from sources that emit 25,000 metric tons or more of carbon dioxide equivalent (CO₂ EQ) per year in the United States. Categories of use which are generally associated with this level of reporting include power plants, petroleum and natural gas systems, refineries and other heavy manufacturing processes. On Lānaʻi, there are no facilities operating at or above the 25,000 metric ton level (U.S. EPA, 2019)

b. Potential Impacts and Proposed Mitigation Measures

The introduction and 50-year period of protecting non-native grazing herbivores, such as cattle and sheep, on Lānaʻi between 1780 and 1830 had denuded much of the native forest on Lānaʻi, thereby reducing the island's ability to absorb carbon dioxide. As part of the effort to redefine Lānaʻi as a sustainable community, Pūlama Lānaʻi itself, and in partnership with other organizations, is managing and protecting Lānaʻi's natural resources with projects such as, but not limited to, native reforestation.

Additionally, in keeping with its vision of sustainability, Pūlama Lānaʻi has incorporated energy efficiency and energy conservation in its numerous renovations and redevelopments on the island. They have also been a leader in recycling.

Pūlama Lānaʻi sponsors rural recycling collection events for hard to recycle items, including appliances, small scrap metal, vehicles, and vehicle batteries and tires. The County has recycling programs for computers/electronics and household batteries. DOH, in conjunction with Maui Disposal, provides refundable glass and can recycling. Pūlama Lānaʻi provides green waste recycling with subsequent compost available to residents. It also compresses cardboard for shipment to the H-Power plant on Oʻahu.

The carbon footprint of the proposed project will be typically less than other sustainably sensible 201H developments. Pūlama Lānaʻi will ensure that the development incorporates, to the extent feasible and practicable, measures to promote energy conservation, sustainable design, environmental stewardship, and protection of the area's natural and cultural resources.

Moreover, Pūlama Lānaʻi, as landowner of 97 percent of the island and the island's foremost employer, will encourage and promote the use of products that minimize or reduce carbon emissions such as electric vehicles by installing electric vehicle (EV) charging infrastructure and EV charging stations at the parking lot near the community center for use by Hōkūao residents.

Pūlama Lānaʻi has demonstrated its commitment to be responsible. It currently has 70 electric vehicles in its light fleet of 350 vehicles. As electric pickup trucks and freight tractor trucks become available, these will replace the existing gasoline power vehicles in the light car fleet.

Although the development of the proposed project will add to the island's carbon footprint, the scale of the impact is insignificant. Pūlama Lānaʻi has made, and will continue to make, strides in minimizing and mitigating the island's overall carbon footprint.

Residential development of Hōkūao 201H Housing at Lānaʻi City will require minor commitments of both renewable and nonrenewable energy and material resources. Nonrenewable resources that will be used during the project include fuel, water and other resources necessary for the proposed activities.

Pūlama Lānaʻi is also evaluating the option to install photovoltaic and battery solutions for each residential unit that will be designed to provide most of the energy demand for each residential unit. This will significantly reduce the nonrenewable fuel resources for the project (e.g., oil for HECO's power plant), therefore decreasing the total carbon footprint for the project.

Resources that are irreversibly or irretrievably committed to a project are those that are typically used on a long-term or permanent basis; however, those used on a short-term basis that cannot be recovered (e.g., non-renewable resources) also are irretrievable.

All uses in the proposed project will conform to applicable County, State and Federal laws, codes, ordinances, rules and regulations.

Implementation of the proposed action will not result in significant impacts that will not be able to be mitigated, to any environmental resource area. Therefore, the proposed action, in conjunction with other actions on and in the vicinity of residential development of Hōkūao 201H Housing at Lānaʻi City, is not anticipated to result in significant impacts relative to GHG emissions.

12. Noise

a. Existing Conditions

Noise within Hōkūao 201H Housing at Lānaʻi City's regional vicinity is primarily derived from:

1. The natural environment (wind, rain, etc.)
2. Traffic from neighboring roadways
3. Community sounds related to people, animals/pets, etc.
4. Nearby aircraft in flight to/from the Lānaʻi Airport.

b. Potential Impacts and Mitigation Measures

During construction, there will likely be unavoidable noise impacts associated with operation of heavy construction machinery, paving equipment and material transport vehicles. Proper mitigating measures will be employed to minimize construction-related noise impacts and comply with all Federal and State noise control regulations.

Increased noise activity due to construction will be limited to daytime hours and persist only during the construction period. Noise from construction activities will be short-term and will comply with DOH noise regulations (HAR, Chapter 11-46, Community Noise Control). When construction noise exceeds, or is expected to exceed the DOH's allowable limits, a permit must be obtained from the DOH. Specific permit restrictions for construction activities are:

- No permit shall allow any construction activities that emit noise in excess of the maximum permissible sound levels before 7:00 a.m. and after 6:00 p.m. of the same day, Monday through Friday.
- No permit shall allow any construction activities that emit noise in excess of the maximum permissible sound levels before 9:00 a.m. and after 6:00 p.m. on Saturday.
- No permit shall allow any construction activities that would emit noise in excess of the maximum permissible sound levels on Sundays and holidays.

Hōkūao is not expected to cause a significant noise impact following completion of construction, and no mitigation measures beyond

compliance with applicable regulations, requirements, and standards, are required.

It is expected that residential development of Hōkūao 201H Housing at Lānaʻi City will result in a negligible increase in noise that will result in a less than significant impact.

13. **Hazardous Materials**

a. **Existing Conditions**

A Phase I Environmental Site Assessment (ESA) and subsequent testing were conducted on the site and nearby property by TRC Environmental Corporation. See **Appendix “G”**. It has been determined that in 1948, a portion of a nearby property was developed with a power plant building that was operated by the Dole Company for pineapple plantation activities until 1988. Further discussion of historical uses on the project site are included in **Appendix “E”**.

Pineapple fields, operated by the Dole Company, appear to have encompassed the remaining portions of the Site until approximately 1991. In 1992, the Lānaʻi City Nursery and community gardens were developed in the central portion of the Site, adjacent to overgrown vegetation adjoining the Wastewater Treatment Plant.

The ESA identified four (4) recognized environmental conditions (RECs) where additional investigation was recommended. These RECs included the following:

- Former pesticide storage shed;
- 55-gallon diesel fuel drum;
- Former emulsion plant; and
- Former Maui Electric Co. (MECO) power plant.

In addition to these four (4) RECs, it was decided to also assess former agricultural areas of the Site where historic pineapple growing operations occurred and a concrete pad was used to wash down agricultural equipment.

As a result of the Phase I ESA, including but not limited to visual observation of the Site; review of historical information, environmental databases, and information provided by the User; interviews with current Site representative(s); and the professional judgment of the preparer,

several RECs and controlled recognized environmental conditions (CRECs) associated with the Site, as defined by the ASTM E 1527-13 standard were identified.

The *Final Site Characterization Report & Environmental Hazard Evaluation* (SCR/EHE) was submitted to State of Hawai'i, Department of Health (HDOH) on February 10, 2021. The conclusions of the Final SCR and EHE provide final results for all areas of concern (AOCs), with the exception of the former Maui Electric Co. (MECO) Power Plant AOC.

HDOH completed its review of the SCR/EHE and notified Pūlama Lāna'i and TRC via a letter dated March 23, 2021. The letter stated that "*HDOH HEER has reviewed the subject report and has no additional comments at this point*" and looks forward to receiving the Removal Action Completion Report (RACR) once all removal has been completed. See **Appendix "G-1"**.

The following section includes information from executive summary of the *Final Site Characterization Report & Environmental Hazard Evaluation* that was submitted to HDOH on February 10, 2021:

Background: The site characterization and environmental hazard evaluation was conducted by Pūlama Lāna'i with the objective to characterize surface soils within the defined project boundary to determine if the Site is suitable for residential use. In advance of planned construction activities at the Site, surface soil samples were collected according to guidance provided in the State of Hawai'i Department of Health (HDOH) Hazard Evaluation and Emergency Response (HEER) Office Technical Guidance Manual (TGM [HDOH, 2017]) to evaluate the nature and extent of potential contamination due to historical operations, including the use of a large portion of the Site as pineapple growing fields. This Site Characterization Report and Environmental Hazard Evaluation documents all sampling activities, laboratory analysis, data validation, additional stockpile characterization, and soil removal actions performed to achieve the overall objective that concentrations of chemicals of potential concern (COPCs) in surface soils are below screening levels. Screening levels used for the Site Characterization are the HDOH HEER Tier 1 Environmental Action Levels (EALs) for unrestricted/residential (unrestricted) land use for a site where groundwater is a potential drinking water resource and surface water is greater than 150 meters (approximately 500 feet) from the site boundary (Tier 1 EAL) (HDOH,

2017); or if there is no Tier 1 EAL, the Region 9, United States Environmental Protection Agency Regional Screening Levels for residential soil (EPA RSLs) (EPA, 2019).

Summary of Work: The site characterization was performed by TRC on behalf of Pūlama Lānaʻi and the documented work scope was proposed in the Final Sampling and Analysis Plan (FSAP), Lanai City Expansion, Lanai City, Hawaii (TRC, 2017). The HDOH is providing regulatory oversight for this project and approved FSAP in correspondence dated December 20, 2017.

The site characterization was conducted according to guidance provided in the HDOH Hazard HEER Office TGM. Each area of concern (AOC) was subdivided into several decision units (DUs) and sampled using multi-increment (MI) methodology. Soil samples were analyzed for specific COPCs based on the AOC being characterized.

Summary of Results: Soil Sampling: With the exception of the former MECO Power Plant and the former Pesticide Shed, the results of the MI sampling indicate residual levels of COPCs are not present in surface soil at concentrations above screening levels and the Site is suitable for unrestricted/residential use.

One (1) of three (3) DUs from the pesticide shed (PS-DU2) and seven (7) of eleven DUs from the former MECO Power Plant, resulted in concentrations above the Tier 1 EALs. The remainder of the Site soils have no other exceedances of screening levels for the COPCs analyzed.

Additional Investigations and Removal Action:

Site-wide stockpile investigation

Over the course of the site characterization, multiple stockpiles were discovered throughout the Site. Some of these stockpiles restricted access to DUs within the former agricultural area. These site-wide stockpiles were comprised of raw construction materials (gypsum, cinder, or mulch) and some were a combination of soil, construction debris, and refuse. No laboratory data was available for the stockpiles containing soil; therefore, sampling and laboratory analysis was performed to properly characterize prior to relocation or disposal.

Results of laboratory analysis were compared to the Tier 1 EALs and EPA RSLs for unrestricted/residential use. Concentrations of COPCs

from the site-wide stockpiles were below screening levels for the COPCs analyzed.

Former MECO Power Plant – Demolition and Soil Sampling

Demolition activities associated with the decommissioning of the former MECO Power Plant resulted in the discovery and subsequent excavation of concrete footings beneath the plant structure. Previous investigations in this area indicated the presence of hydrocarbon-impacted soil beneath the building which may have been removed during these excavation activities.

TRC collected MI samples from the base and sidewalls of the excavation. Laboratory analysis resulted in concentrations exceeding the Tier 1 EAL for total petroleum hydrocarbons as diesel (TPH-D) and TPH as motor oil (TPH-O) in the MI sample collected from the base of the excavation DU. No other exceedances were observed as concentrations were below screening levels for other samples collected from the former MECO Power Plant excavation.

The final excavation was measured at approximately 4,122 square feet (ft²) to 10 feet below ground surface (bgs). A total of approximately 500 CY of excavated soil was placed into seven stockpiles ranging from approximately 36 CY to 128 CY.

Soil stockpile samples collected resulted in concentrations exceeding the Tier 1 EAL for TPH-D and TPH-O in two (2) stockpiles sampled. The remaining stockpile samples were below the screening levels.

Following the discussions with HDOH personnel, excavation backfill initially consisted of the stockpiled soil from the former MECO Power Plant that exceeded Tier 1 EALs. Soil from the site-wide stockpiles located north of the commercial nursery was used to complete the backfill. Backfilled soil was placed to a depth of 10 feet bgs.

Pesticide Shed Removal Action

Based on laboratory results of the MI sampling at the Pesticide Shed AOC, a removal action was implemented to address impacted soil in one (1) DU. Prior to the removal action, discrete-depth soil samples were collected at 1-foot intervals to a depth of five (5) feet bgs to pre-characterize the depth of the excavation.

Based on the results of the subsurface soil samples, the impacted DU was excavated to a depth of approximately 2.5 feet bgs and

approximately 25 cubic yards (CY) of soil was loaded directly into an onsite container for off-island disposal. Following completion of the excavation, confirmation soil sampling was performed on the base and the sidewalls of the excavation. Laboratory analysis of all confirmation soil samples resulted in concentrations below Tier 1 EALs.

Environmental Hazard Evaluation (EHE)

An EHE was performed to identify potential environmental hazards associated with contaminant concentrations in soils through comparisons with established Tier 1 EALs for specific hazards and transport mechanisms. The evaluation of the MI soil data resulted in seven (7) surface DUs at the former MECO Power Plant being flagged as potential hazards due to concentrations exceeding COPC Tier 1 EALs for either gross contamination, potential for leaching to soil or groundwater, or human direct exposure. Additionally, three (3) MI soil samples collected from the base of the MECO excavation and MECO stockpiles also exceeded COPC Tier 1 EALs.

Construction Specific Environmental Hazard Management Plan (C-EHMP)

Potentially unacceptable risks and hazards identified in the EHE must undergo removal action or be managed with a site-specific C-EHMP. While most of the Site poses no environmental hazards for a proposed residential scenario, potential gross contamination, direct exposure, and leaching hazards are present at the former MECO Power Plant AOC. Hazards previously identified in the former Pesticide Shed area were subsequently addressed with the removal action and require no C-EHMP.

Based on planned future use, these hazards require either corrective action, or land use controls and long-term management of contaminated soil. During construction or site activities which pose a potential risk of exposure for workers to contaminated soil, work must be supervised and performed by properly trained and certified personnel. Those working in areas with a potential for contact and exposure shall have current Hazardous Waste Operations and Emergency Response training. Potentially impacted soil handling during future construction activities within the former MECO Power Plant AOC, will need to be managed with a C-EHMP, as necessary. Soil to be removed should be evaluated for reuse, recycling, or disposal options.

Conclusions and Recommendations: Except for the former MECO Power Plant AOC, the remainder of the 85-acre site has been fully assessed for the purposes of residential redevelopment based on the results of this investigation. Concentrations of potential COPCs identified in the FSAP for each AOC are either below Tier 1 EALs, EPA RSLs, or below laboratory detection limits and should have no restrictions for future use.

It is recommended that impacted DUs within the former MECO Power Plant AOC undergo additional assessment and a removal action be conducted to adequately address hazards identified during this investigation. Additionally, hydrocarbon-affected soil at 9 to 10 feet bgs within the former MECO Power Plant excavation should be assessed for possible vapor migration to the surface and risks to human health.

b. Potential Impacts and Mitigation Measures

Pūlama Lāna'i will continue to work with TRC to complete the recommendations from the Final Site Characterization Report & Environmental Hazard Evaluation (SCR/EHE) stated above.

Further, while the Final SCR/EHE was being prepared, TRC continued to work with HDOH to address the conclusions and recommendations for the MECO Power Plant moving forward. Following COVID delays in 2020, the confirmation sampling began in August 2020 and continued through February 2021. Preliminary results have indicated that samples collected along the southern fence line of the former MECO Power Plant are below Tier 1 EAL for Diesel.

TRC will submit a draft Removal Action Completion Report (RACR) to HDOH summarizing the removal action activities at the former MECO plant, results of the confirmation sampling, and documentation of soil disposal. Once the RACR is finalized, that will complete the initial recommendation for removal action of the surface hazards outlined in the SCR/EHE.

Pūlama Lāna'i is working with TRC (in consultation with and guidance from HDOH) to commence a soil vapor survey to assess risk for this area. A report will be incorporated in a final Environmental Hazard Management Plan for submission and project closure to HDOH. HDOH is expecting no issues, the homes incorporate a pier and beam construction, no exposure to the ground soils.

Construction activities on the Hōkūao 201H Housing Project will not commence until the Removal Action Completion Report is accepted and/or approved by the HDOH or other applicable regulatory authority has issued a No Further Action (NFA) letter or other similar closure document.

Therefore, the level of the impact due to findings of the Environmental Site Assessment with the incorporation of HDOH approved mitigation measures, is anticipated to be not significant.

14. Scenic and Open Space Resources

a. Existing Conditions

The irregularly shaped project area is located immediately west of and downslope from Lānaʻi City. The project site is bounded on the east by Fraser Avenue and two (2) church parcels; on the north by Ninth Street and a dirt road following TMK boundaries. Most of the western boundary is marked by the chain-link fence boundary of the wastewater treatment plant, while the southern boundary follows Twelfth Street and Awalua Avenue.

Most of the project area topography consists of flat to gently sloping open, patchy forest and scrub lands. An existing drainage swale on the western boundary of the site carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant with a 600-foot buffer between the closest lot and the WWTP edge.

Adjoining is Lānaʻi City and the variety of residential, commercial, industrial and public uses.

b. Potential Impacts and Mitigation Measures

The project site is not part of a scenic corridor and the project will not affect scenic vistas and view planes. The proposed project will not involve significant alteration of the existing topographic character of the site.

The character of the homes will reflect the existing design vernacular of Lānaʻi City; the houses will have hipped roofs, gracious lanais, board and batten siding, large trim profiles, and other design details matching Lānaʻi City building characteristics.

Hōkūao is designed to perpetuate the site-planning and architectural character already present throughout Lānaʻi City. As an intact plantation town, and with a unique town center seen nowhere else in the islands, this

strong and attractive vernacular serves as the design basis for Hōkūao. And in its expansion westward of Fraser Avenue, this development will also serve as a model for future private and public housing projects proposed in the immediate vicinity.

With most of the plantation structures laid out and built within a short time frame as part of a company housing provision, a discernable character for Lānaʻi City was established. These include: rectilinear street patterns; small lot size, lots enlarging as one moves away from Dole Park; and small/uniform residential homes scale.

A similarly concentrated commercial core replicates the scale and character of nearby residences. This gives the city a cohesive, balanced appearance throughout the community. Hōkūao will reiterate these in the new development and are in keeping with proposed design guidelines.

The mitigation for the impacts to visual and aesthetic resources is incorporated into the project's design are designed to have the additional housing blend in with the existing housing.

Therefore, the level of the visual impact after mitigation is anticipated to be less than significant.

15. Beach and Mountain Access

a. Existing Conditions

The project is located approximately 8.5 miles from the nearest beach and approximately 3.5 miles from the peak of Lānaʻihale – the highest point on the island. The CIA conducted for the proposed project concluded that there are no activities related to gathering, access, or other customary activities occurring in the project vicinity. Refer to **Appendix “E”**.

b. Potential Impacts and Mitigation Measures

There are no traditional access trails identified in close proximity to the proposed project area. Accordingly, there are no anticipated adverse impacts to beach and mountain access from the proposed project.

B. SOCIO-ECONOMIC ENVIRONMENT

1. Population and Demography

a. Existing Conditions

The proposed project is located in Lānaʻi City, Lānaʻi, within the Lānaʻi Community Plan region.

Maui County’s population in 2019 was approximately 167,500, an increase of approximately eight (8) percent since 2010, when the population stood at 154,930 (U.S. Census Bureau, 2019). The population on Lānaʻi was 3,135 people in 2010 – a decrease of 91 people from 2000 (U.S. Census Bureau, 2000 and 2010). In 2020, CBRE prepared a Market Study Economic Impact Analysis & Public Cost Benefit Assessment for the proposed Hōkūao 201H Housing at Lānaʻi City. See **Appendix “H”**. The study provided an estimate of 3,000 residents currently living on Lānaʻi due to out-migration tied to the onset of COVID and associated loss of employment. The population is projected to reach between 3,433 and 3,486 persons by 2035.

b. Potential Impacts and Mitigation Measures

The proposed project is not anticipated to have significant adverse impact on population or demographic trends of Lānaʻi. It is anticipated that the inhabitants of the proposed project currently reside on Lānaʻi and in Maui County and will be relocating over-crowded residences and/or older units.

2. Economy

a. Existing Conditions

According to the data from the State Department of Labor and Industrial Relations, there were 1,600 (annual average) non-agricultural jobs on Lānaʻi in 2019 (Department of Labor and Industrial Relations, 2019). Jobs in the retail trade industry accounted for less than 50 (annual average) of the total jobs on the island, and jobs in the leisure and hospitality industry accounted for 700 (annual average) jobs, or 43.8 percent (Department of Labor and Industrial Relations, 2019).

Hawaiʻi’s economy through 2019 was strong, with record-setting visitor arrivals and low unemployment. However, the COVID-19 pandemic will have far reaching impacts on the economy on Maui, in Hawaiʻi, and across the nation and world. Stay-at-home regulations and travel quarantines

aimed to curb the spread of COVID-19 virus in Hawai'i have caused many businesses to shut down or drastically reduce operations. Unemployment in Maui County and the State reached record levels. In March 2021, statewide unemployment was 8.6 percent, compared to just 2.1 percent in March 2020 (prior to the COVID-19 pandemic). Unemployment in Maui County was the second highest county in the State. In March 2021, unemployment in Maui County stood at 12.2 percent. In March 2021, unemployment on Lāna'i was 4.9 percent (Department of Labor and Industrial Relations, 2021).

b. Potential Impacts and Mitigation Measures

On a short-term basis, the project will support construction and construction-related employment. Over the long term, the proposed rental housing community provides an affordable alternative to residents who qualify for affordable rentals and homes. The project is not anticipated to have significant adverse impacts on labor conditions due to the nature of the proposed improvements.

Market Study, Economic Impact Analysis & Public Cost Benefit

In 2020, CBRE prepared a Market Study Economic Impact Analysis & Public Cost Benefit Assessment for the proposed Hōkūao 201H Housing at Lāna'i City. Refer to **Appendix "H"**.

It should be noted that at the time the Market Study, Economic Impact Analysis & Public Cost Benefit Assessment was written, the Hōkūao project was intended to include 135 2-bedroom units (76 affordable units and 59 market rate units) and 15 4-bedroom market rate units. Since then, the project has been updated to include only 2-bedroom units, nonetheless, the number of affordable (76 units) and market rate (74 units) homes remain the same.

Market Study

Existing Conditions

- Prior to the onset of the COVID-19 Pandemic, the State of Hawai'i had steadily rebounded from the 2008-09 recession and associated down-cycle in the real estate market with an extended-term favorable economic period featuring gradually and consistently strengthening property sectors.
- Sales activity, volume, and prices all showed meaningful post-recession recovery/stabilization on Lāna'i; in many cases reaching

near to full recovery to the levels achieved during the 2004-07 peak market years. The state economy had one of its best years ever in 2019 and the first three months of 2020 were showing signs of an even stronger year. However, the global pandemic has erased any economic gains of 2020 and has pushed the state into a recession due to a state mandated 14-day quarantine.

- The July unemployment rate on Lānaʻi was at 4.8 percent (near peak recession levels), and some 752 employees of the Four Season Resorts were issued furlough and lay-off notices in August after the second shutdown of interisland travel by the Governor, which could increase unemployment several fold; although concurrent with the report date plans were announced to re-open the resort in October and begin ramp-up and re-staffing. Prior to COVID, and indicative of long-term job market potentials, the unemployment rate had dropped to about 0.5 percent (effective full employment). Per capita income in Maui County grew at 3.9 percent compounded annually over the past decade and Lānaʻi was experiencing generally positive economic activity and stable tourism until March 2020. There was some \$124.5 million in visitor spending last year on the island, with a statewide-leading Per Person Per Day Spending of \$457, more than double any other island. Total Visitor Arrivals and Total Visitor Days also reached new all-time highs in 2019.
- As with most in Hawaiʻi, the Lānaʻi residential real estate market has generally weathered the COVID Pandemic well, a function of generationally-low mortgage interest rates, chronic housing shortages, and limited inventory. 2020 is on pace to have the highest single family “Sales volume” (total dollars spent) since record-setting 2014; the “number of sales” for the year will be well above annual averages for the past decade; and stable; and, relatively high median prices are being maintained.
- Though difficult to accurately estimate, the population of the island has declined in recent years and is now likely below the 3,335 persons counted in the 2010 census. The most recent (2018) Census estimate was at 2,802 persons, down from the 3,356 average count since 2010. Further with the onset of COVID and associated loss of employment there has been some out-migration. CBRE used a conservative estimate of 3,000 residents on Lānaʻi as of mid-2020, reaching between 3,433 and 3,486 persons by the end of their projection modeling period, as shown below.

- There are an estimated 1,463 “housing units” on Lāna‘i; there have been no major additions over the past two years but some individual homes have been built. CBRE estimated the 2020 housing unit count is about 1,480, of which 13 are identified as vacation rentals, resulting in 1,467 available housing units. **Table 1** notes the quantification of housing unit demand for Lāna‘i for 2020 to 2035.

Table 1. Quantification of Housing Unit Demand for Lāna‘i for 2020 to 2035.

Scenario	Current 2020	Projected Lanai Resident Population		
		2025	2030	2035
<i>One: Based on Historic Growth Trend 1980 to 2020</i>				
Resident Population	3,000	3,138	3,282	3,433
<i>Two: Maximum Based on Extrapolated/Adjusted County Planning Department Technical Forecasts</i>				
Resident Population	3,000	3,154	3,316	3,486

Source: CBRE, 2020

- The current average Lāna‘i resident household size is about 2.48 persons and is forecast to decline in coming decades as a result of evolving family/household trends and an increasingly diverse mix of unit types of new development. By 2035, the average household size in the study area is anticipated to lower to 2.30 to 2.34 persons.
- In 2018 (most recent data), some 43.6% of the occupied housing units on the island were “Renter-Occupied”; which is generally consistent with statewide (41.7% of total units) and Maui County (39.8%). The percent of rented units on Lāna‘i has decreased in recent years, averaging 46.6% annually from 2010 through 2018. However, the efficacy of this metric is limited by the small size of the Lāna‘i City market and concentrated land use/ownership, as the “market” does not provide the opportunity for supply to accurately reflect demand desires.
- There is a scarcity of homes on the island available for long-term residential rental. As of the publication date, there were a cumulative total of four such units listed on rent.com, Zillow.com, apartment.com, craigslist, and lanai96793.com, as shown below.
- This is insufficient to provide for general market demands, meeting a diversity of specific tenant needs, and a vacancy allowance capable of servicing the community.
- Maui County/HUD 2020 “affordable” housing pricing guidelines set rents for two-bedroom units at from \$603 monthly (households at

50% of the Lānaʻi Median Household Income - MHI) to \$1,688 monthly (140% of Lānaʻi MHI). Affordable rents for four-bedroom units ranges from \$777 (50% of MHI) to \$2,176 (140% of MHI). The average monthly rent in Maui County for long-term residential tenancy was \$1,406 in 2018.

- There have been numerous long-term proposed developments on Lānaʻi over the past decade, most by Pūlama Lānaʻi. The projects controlled by Pūlama Lānaʻi are generally on-hold and subject to unit count change. Further, the County Lānaʻi City Housing Project (with up to 400+ units) is onhold pending selection of a new developer and 105 units will be in a restricted Department of Hawaiian Home Lands (DHHL) subdivision. CBRE considers it unlikely that all of the proposed units will be manifest for many decades and have estimated only some 113 non-subject units will likely be built before 2035.

Economic Impact Analysis

CBRE constructed a model depicting the economic impact of the Hōkūao projects on the Lānaʻi and Statewide community during the course of its “lifespan” from anticipated groundbreaking in 2021, through absorption (2029), to build-out 2030, and stabilized “operations thereafter.

- The development of Hōkūao will bring in an estimated \$115.2 million of new, direct capital investment with significant unquantified indirect expenditures into the island's real estate market and generate: \$166.3 million in total new economic activity island-wide during its build-out over a 10-year period (forecast from 2021 through 2030). It will contribute some \$8.3 million in annual economic activity on a stabilized basis thereafter. Included in the economic impact analysis was the number of full-time equivalent employment positions directly and indirectly created by the project, as well as the economic impact of supplies purchased for the project and the tax impacts related to the proposed project. Refer to **Appendix “H”**.

Potential Impacts and Mitigation Measures

The Market Study, Economic Impact Analysis and Public Cost Benefit Assessment report concluded that the Hōkūao Project will have positive economic impacts on jobs, earnings, and tax revenues for Lānaʻi and Maui County. These impacts include direct, indirect, and induced economic outputs. Overall there will be 687 person-years of employment produced

over the course of the project. It will produce an estimated \$52 million in earnings, \$19.5 million in state taxes, and nearly \$7 million in county taxes.

Based on the market analysis, CBRE concluded that new housing units in Lānaʻi should be generally priced/rented within the following ranges:

- 21.6 percent affordable price or rent, according to affordability guidelines for a household earning 80 percent of the County median household income ("Low Income");
- 37.4 percent affordable for households earning 80 percent to 120 percent of the County median household income ("Below Moderate" to "Gap Income" categories);
- 41 percent at market prices/rents with household earning above 120 percent of the County median household income.

The 76 two-bedroom workforce/affordable homes at Hōkūao will have rents set according to prevailing HUD/County formula at the time of construction, with rents ranging from \$603 to \$1,688 per month in 2020 dollars based on the 2020 HUD guidelines as adjusted for Lānaʻi.

It is anticipated the 74 market homes at Hōkūao will likely be rented at over \$1,800 monthly (based on 2020 dollars, subject to change based on market conditions).

Based on absorption analysis, CBRE estimates the full-absorption of the subject residential component will require about 8 years to be fully absorbed following commencement of pre-leasing (tentatively anticipated for 2021), with the final homes being spoken for by 2029 and built-out by 2030.

No socio-economic or public service/facilities will be negatively impacted through the proposed use.

C. PUBLIC SERVICES

1. Police and Fire Protection

a. Existing Conditions

The project site is within the service area of the Maui Police Department's District II Lānaʻi patrol district which services the island of Lānaʻi. The Lānaʻi Police Station is located at 855 Fraser Avenue, Lānaʻi City which borders the project site to the northeast. The district includes two (2)

motorized beats, each patrolled by one officer. There are 11-full time officers on Lānaʻi including one Lieutenant and two Sergeants and a School Resource Officer. They work out of an 8,000-square-foot facility that includes three jail cells, a juvenile cell, and office space.

Fire prevention, suppression, and protection services for the island of Lānaʻi are provided by the County Department of Fire and Public Safety's Lānaʻi Fire Station. The Lānaʻi Station neighbors the project site to the south and is located at 1345 Fraser Avenue, Lānaʻi City. The station includes a total staffing of 18 personnel. Three captains, six Firefighter III, and nine Firefighter I. Lānaʻi Station houses one Engine Company and one Tanker. There are six personnel on duty daily (Fire's latest posted Annual Report 2014-2015).

b. Potential Impacts and Mitigation Measures

Construction activities are not anticipated to adversely impact police or fire prevention and safety services. At the request of the Fire Department, Pūlama Lānaʻi will incorporate a fire break of approximately 30-feet around the subdivision.

From a long-term perspective, the proposed project is not anticipated to affect the capabilities of police and fire services. The existing operational limits of police and fire services will not be extended or affected by implementation of the proposed project.

2. Medical Services

a. Existing Conditions

On July 1, 2017, Maui Memorial Medical Center, Maui Memorial Medical Center Outpatient Clinic, Kula Hospital, Kula Clinic, and Lānaʻi Community Hospital became part of Maui Health System, which is affiliated with Kaiser Permanente. These facilities will continue to operate as vital community hospitals, open to everyone regardless of health coverage.

Lānaʻi Community Hospital is the only hospital on the island of Lānaʻi. It is the sister hospital to Kula Hospital and Maui Memorial Medical Center. It has limited 24-hour emergency care, acute care and diagnostic imaging. It also provides long-term care (including skilled and intermediate nursing care).

b. Potential Impacts and Mitigation Measures

The proposed project will not adversely affect medical services in the area. During project construction, detour routes will not be necessary. As such, medical responders and services will continue to have access to the areas surrounding the project site.

3. Solid Waste

a. Existing Conditions

The Lānaʻi Landfill on Kaumālapaʻu Highway accepts municipal solid waste and construction debris dropped-off from commercial and residential customers. In addition, personal delivery to the landfill of municipal solid waste, green waste, and trash is available.

Pūlama Lānaʻi also sponsors rural recycling collection events for hard to recycle items including: appliances, small scrap metal and vehicle batteries & tires. The County has recycling programs for computers/electronics and household batteries.

Pūlama Lānaʻi also provides green waste recycling with subsequent compost available to residents.

HDOH, in conjunction with Maui Disposal, provides refundable glass and can recycling.

The County, through the Department of Environmental Management, provides residential application- based refuse pick up and disposal services on Lānaʻi. Fees for Residential Solid Waste Services are \$192 for Lānaʻi per year and are billed semi-annually in June and December.

b. Potential Impacts and Mitigation Measures

During the initial short-term construction phase of the project, the contractor will develop and implement a construction-generated waste disposal plan. Appropriate construction debris will be taken to the landfill.

Pūlama Lānaʻi will contract with a private entity (e.g., Maui Disposal) for solid waste residential pick up for residents in the project.

The handling of solid waste, as proposed, will ensure that the project will have a less than significant impact in regards to solid waste management.

4. **Education Facilities**

a. **Existing Conditions**

Lānaʻi High and Elementary School consists of seventeen permanent structures, nine portable classrooms, two parking areas, and faculty housing spread over the 10.39 acre campus. Capacity is indicated as 700-students. Present and recent enrollment has been relatively steady with at around 550 to 575 students.

It is the largest of six (6) kindergarten through grade 12 public schools in the Hawaiʻi Department of Education (DOE) system. It is the only school that serves educational needs on the island of Lānaʻi. One of the unique features of the school is the availability of faculty housing on-campus consisting of eight buildings with a capacity of 26 units.

The DOE has prepared a Lānaʻi High and Elementary School Master Plan to guide the physical expansion and development of the school over the next 25+ years. The Master Plan encompasses the existing school facilities and grounds and approximately 50.017 acres makai or to the west of the school. The 50+ acres, while being listed in the master plan, are still owned by the County of Maui and consideration for future uses will need to be a cooperative effort. That master plan incorporates Pre- school, Elementary School, Middle School, High School, and Community College components on one campus.

The Master Plan is predicated on a design enrollment of 700-students. The design enrollment by schools is 320-students for high school (Grades 9-12), 170-students for middle school (Grades 6-8), and 210- students for elementary school (Grades K-5). (Information is from a Final EA for the school master plan (2011) and School Status and Improvement Report (2017)).

b. **Potential Impacts and Proposed Mitigation Measures**

The proposed project and associated improvements are not anticipated to generate population growth since most of the future residents of the affordable housing project are anticipated to already be residing on Lānaʻi in Maui County, but may redistribute population from one area within Lānaʻi City to the project site. As such, adverse impacts on educational facilities are not anticipated.

5. **Recreational Resources**

a. **Existing Conditions**

Public parks and recreational facilities are administered and maintained by the Maui County Department of Parks and Recreation, as well as associated with the Lānaʻi public school. County parks and facilities in Lānaʻi City include: the Lānaʻi Community Center, the Lānaʻi Gym and Tennis Courts, the Lānaʻi Little League Field, Fraser Avenue Park, and Kaumālapaʻu Highway/Fraser Avenue Park.

The use of the schools' athletic ball fields by entities other than the DOE is determined by the Principal through Use of Facility requests. The Lānaʻi High and Elementary School Master Plan Environmental assessment notes plans for replacement/additional recreational facilities.

There are also a number of Pūlama Lānaʻi-owned and maintained recreational facilities that are available for public use. Situated in Lānaʻi City, Dole Park is a Pūlama Lānaʻi-owned park utilized by the public. Additional Pūlama Lānaʻi-owned parks utilized by the public include Olopuia Woods Park and Waialua Park in Lānaʻi City and Hulopoe Beach Park near Mānele Small Boat Harbor.

The Lānaʻi Recreation Center is a Pūlama Lānaʻi-owned and maintained recreational complex which is utilized by the public. The Center encompasses a heated swimming pool, basketball court, exercise track, fitness course, softball fields, football field, recreational building, and playground.

Other Pūlama Lānaʻi-owned recreational facilities on Lānaʻi include the 18-hole championship golf course at Mānele Resort. Pūlama Lānaʻi also owns the 9-hole Cavendish Golf Course, which provides recreational opportunities for Lānaʻi residents at no cost.

Hökūao 201H Housing Project proposes to add a 1-acre park, a 1,500-square foot community center for use by the Lānaʻi community, and 60 parking stalls for intermittent parking (e.g., community events at the community center, guests visiting residents of the Hōkūao residential units, etc.).

b. **Potential Impacts and Mitigation Measures**

The proposed project is not expected to have significant adverse impact to public recreational opportunities. As noted above, most of the future

residents of the affordable housing project are anticipated to already be residing on Lānaʻi. As such, the proposed project may redistribute population from one area within Lānaʻi City to the project site, rather than an increase of the overall population. As such, no significant adverse impacts to recreational opportunities are anticipated.

D. INFRASTRUCTURE

1. Roadways

a. Existing Conditions

This section discusses the traffic in the region and the specific project area, the potential impacts of the project on traffic, and the mitigation measures to mitigate potential impacts.

It should be noted that at the time the Traffic Impact Analysis Report (TIAR) was written, the Hōkūao project was intended to be a 200-unit 201H housing development. Since then, the unit count has decreased to a 150-unit 201H housing development, nonetheless, the footprint of the development has remained the same. The estimated traffic should be lower, and the analyses and conclusions remain valid. The TIAR was included within the Preliminary Engineering Report. See **Appendix “I”**.

The traffic analysis, conducted by Austin Tsutsumi & Associates, considered the proposed Hōkūao 201H Housing at Lānaʻi City. The following are brief descriptions of the existing roadways studied within the vicinity of the Project:

Kaumālapaʻu Highway is an east-west, two-way, two-lane roadway that runs perpendicular to Fraser Avenue. This roadway begins to the west at the Fuel Depot and terminates to the east at its intersection with Lānaʻi Avenue/Queens Street. The speed limit along Kaumālapaʻu Highway is 45 mph near Lānaʻi City and changes to 30 mph to the east, after the Lānaʻi Airport.

Fraser Avenue is a north-south, two-way, two-lane roadway in the vicinity of the study intersections and provides access through Lānaʻi City. This roadway begins to the south at a T-intersection with Kaumālapaʻu Highway and terminates to the north as an outlet. The posted speed limit along this roadway in the vicinity of the Project is 20 miles per hour (mph). This roadway serves as one of the main roadways through the city and provides access to Lānaʻi Elementary and High School, churches, park, and other smaller

streets that have access to restaurants and retail.

Ninth Street is an east-west, two-way, two-lane roadway that runs perpendicular to Fraser Avenue. This roadway begins to the west at a T-intersection with Awalua Avenue and terminates to the east at a T- intersection with Kauna Oa Drive. The posted speed limit was not observed along the roadway.

Tenth Street is an east-west, two-way, two-lane roadway that runs perpendicular to Fraser Avenue. This roadway begins to the west at a T-intersection with Fraser Avenue and terminates to the east at a T- intersection with Queens Street. The posted speed limit was not observed along the roadway.

Twelfth Street is an east-west, two-way, two-lane roadway that runs perpendicular to Fraser Avenue. This roadway begins to the west at a T-intersection with Fraser Avenue and terminates to the east at a T- intersection with Ilima Ave. The street continues to the east as a T-intersection with Lānaʻi Avenue and terminates to the east as a T-intersection with Queens Street. The posted speed limit was not observed along the roadway.

Thirteenth Street is an east-west, two-way, two-lane roadway that runs perpendicular to Fraser Avenue. This roadway begins to the west at a T-intersection with Fraser Avenue and terminates to the east at a T- intersection with Lānaʻi Avenue. The posted speed limit was not observed along the roadway.

Manele Road is a north-south, two-way, two lane roadway. This roadway begins at its intersection with Kaumālapaʻu Highway and terminates to the south at the Manele Small Boat Harbor. The posted speed limit on Manele Road is 35 mph.

Analyses for the study intersections were performed using the traffic analysis software Synchro, which is able to prepare reports based on the methodologies described in the Highway Capacity Manual. These reports contain control delay results as based on intersection lane geometry, signal timing, and hourly traffic volumes. Based on the vehicular delay at each intersection, a Level of Service (LOS) is assigned to each approach and intersection movement as a qualitative measure of performance.

These results, as confirmed or refined by field observations, constitute the technical analysis that will form the basis of the recommendations

LOS is a qualitative measure used to describe the conditions of traffic flow at intersections, with values ranging from free-flow conditions at LOS A to congested conditions at LOS F.

b. Potential Impacts and Mitigation Measures

The Institute of Transportation Engineers (ITE) publishes a book based on empirical data compiled from a body of more than 4,250 trip generation studies submitted by public agencies, developers, consulting firms, and associations. This publication, titled Trip Generation Manual, 10th Edition, provides trip rates and/or formulae based on graphs that correlate vehicular trips with independent variables.

The Project is forecast to generate approximately 147(221) trips during the AM(PM) peak hours of traffic.

Under existing conditions, all intersections currently operate at LOS B or better during the AM and PM Peak hour of traffic. No significant delays or queuing were observed at any of the intersections during the peak hours of traffic.

Traffic projections were formulated by applying a defacto growth rate to the existing 2016 traffic count volumes as well as trips generated by known future developments in the vicinity of the Project.

The traffic analysis was performed using standard traffic analysis techniques. Based on the vehicular delay at each intersection, a LOS is assigned to each approach and intersection movement as a qualitative measure of performance. These results, as confirmed or refined by field observations, constitute the technical analysis that will form the basis of the recommendations outlined in the traffic report.

All study intersections are forecast to operate at conditions similar to Base Year 2024 traffic conditions, with all manual turning movements operating at LOS C or better during the AM and PM peak hours of traffic.

No significant delays or queuing were observed at any of the intersections during the peak hours of traffic.

The traffic analysis noted, "No intersection improvements are recommended as a result of the Project." Refer to **Appendix "I"**.

2. Water

a. Existing Conditions

R. M. Towill Corporation prepared a Preliminary Engineering Report (PER) for the Hōkūāo 201H Housing Project. Refer to **Appendix “I”**. The following water section is from this report, as well as the Draft Environmental Assessment for the project, which was prepared by Ho‘okuleana LLC. See **Appendix “I-1”**. It should be noted that at the time the PER was written, the Hōkūāo project was intended to be a 200-unit 201H housing development. Since then, the unit count has decreased to a 150-unit 201H housing development, nonetheless, the footprint of the development has remained the same. The estimated water amounts should be lower, and the recommendations proposed remain valid.

Water Sources

The following is from the Lāna‘i Water Use and Development Plan (2011). Lāna‘i lies in the rain-shadow of Maui and Moloka‘i. The island has no major surface water sources. The sustainable yield (SY) of Lāna‘i is estimated at 6 million gallons per day (MGD). Virtually all of this is located in the Central aquifer sector which is divided into two (2) aquifer systems with 3 MGD each. Withdrawals come primarily from eight (8) wells, with the exception of about 2,000 gallons per day (GPD). The Commission on Water Resource Management (CWRM) in 2019, reviewed all the Hawai‘i Counties’ SY and increased/decreased/no change as a result of further water analysis entitled Robust Analytical Modeling (RAM). On Lāna‘i, they allowed for the possibility that there are seven (7) additional aquifers that could provide water to Lāna‘i with up to a SY of 36 MGD. Further research is needed and then accepted by CWRM to change the SY from 6 MGD.

The Lāna‘i Water Company privately owns the domestic water system on Lāna‘i. The water for this system is provided by existing groundwater sources and the water quality has met all State of Hawai‘i regulations for drinking water.

The water system for Lāna‘i is divided into nine (9) aquifer systems for the island. The Project falls within the Leeward Aquifer; however, water to support the project is intended to come from the Leeward and Windward aquifers.

Lāna‘i has five (5) water supply systems, including two (2) public drinking water systems, two (2) reclaimed water systems, and a brackish water

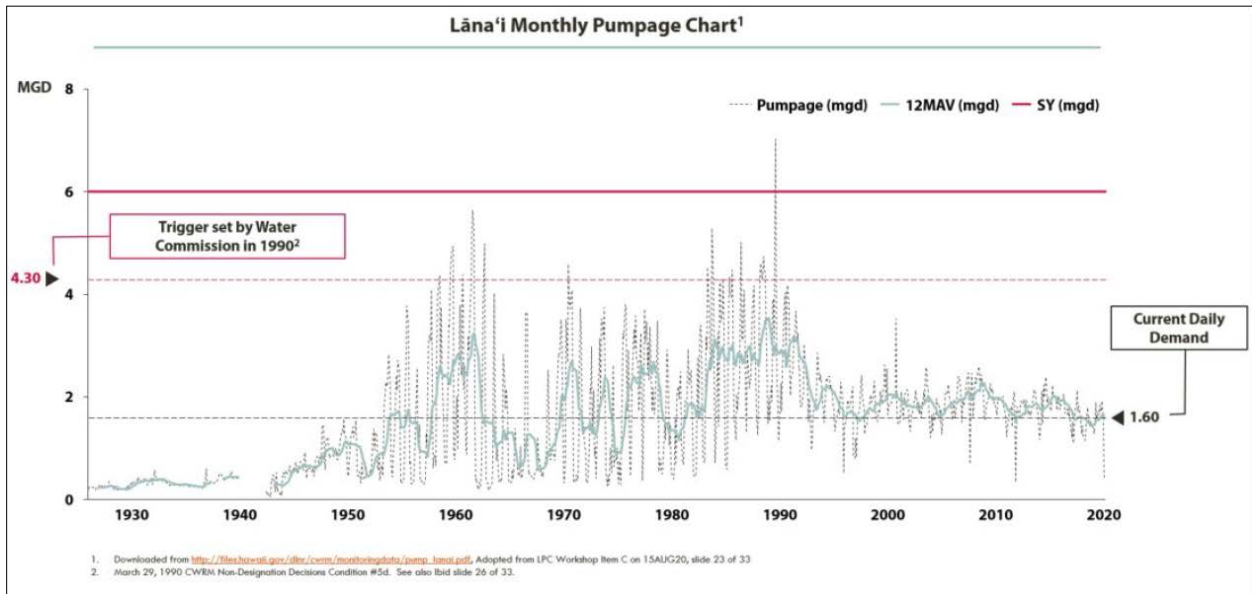
system. All are owned and operated by wholly owned subsidiaries of Pūlama Lānaʻi. See **Figure 8**.

Collectively, these systems include about 79 miles of active pipe, 35 MG of storage, of which about 4.8 MG is potable, and about 6.394 MGD installed well capacity of which 5.04 MGD is potable.

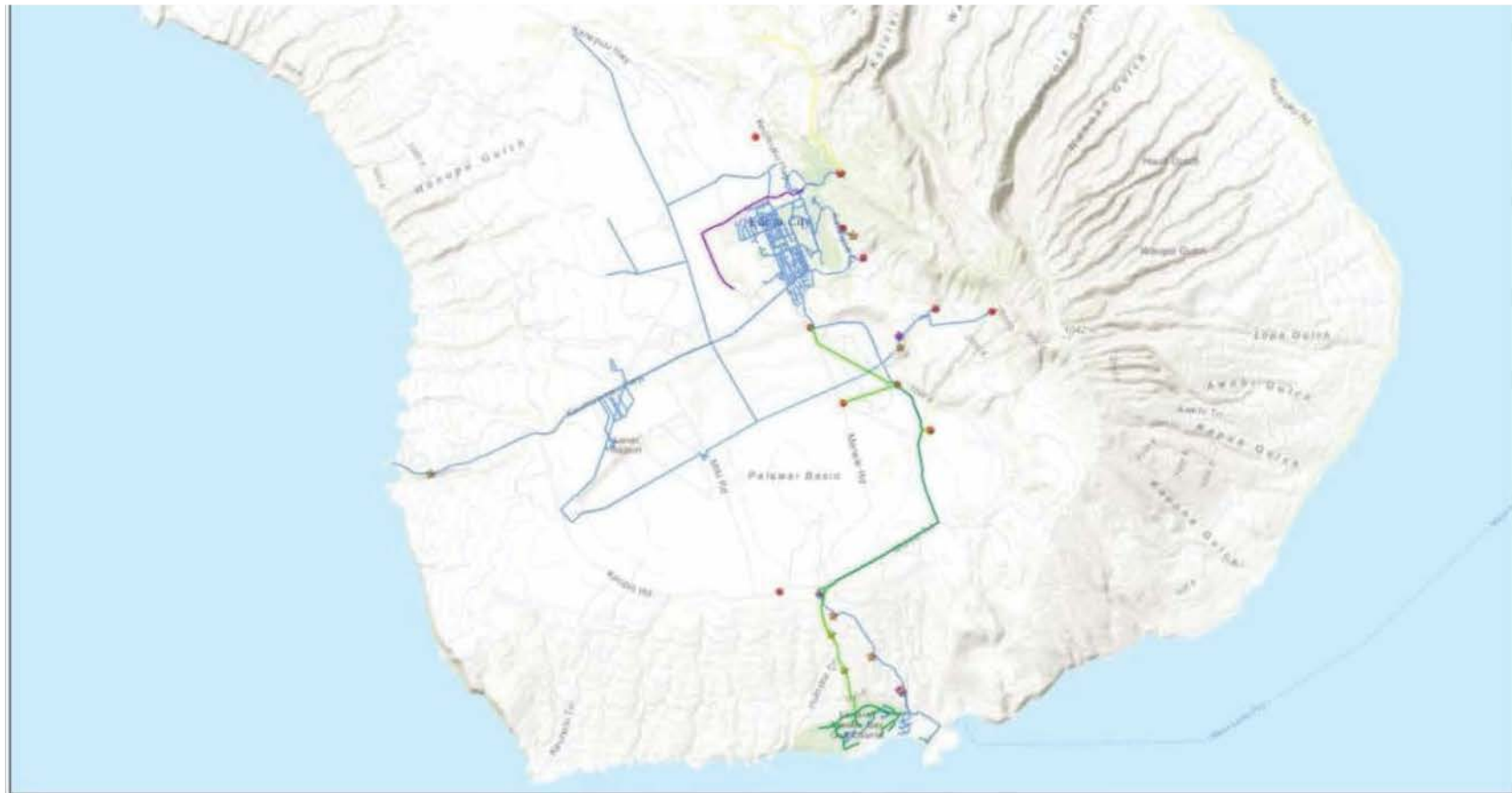
No surface water sources remain on Lānaʻi.

Table 2 notes the monthly pumpage and 12-month moving average for Lānaʻi wells from 1926 through early 2020. The table also notes the trigger (red line) set by the Lanai Water Commission is lower than the SY for the island.

Table 2. Lānaʻi Monthly Pumping Chart

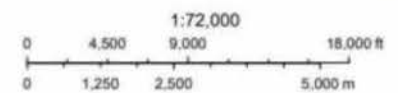


Monthly Pumpage (blue) – 12-month moving average (green) and Sustainable Yield (red) for Lānaʻi wells (CWRM)
 (Note peak withdrawal years in the 1950s to early 1990s were during the pineapple cultivation on the island.)
 (Source: Commission on Water Resource Management)



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- Drinking Water — LASR * Reservoirs
- Brackish Main • Wells
- Lanai City R1 * Tanks



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Source: Peter Young, Ho'okuleana LLC. Hōkūāo 201H Housing Project Draft Environmental Assessment (October 2020)

Pūlama Lāna'i
State Land Use Commission, Feb 2012 | Esri, HERE, Garmin, USGS, METI/NASA, NGA, EPA, USDA |

Figure 8

Hōkūāo 201H Housing Project Existing Water Service Map

NOT TO SCALE



Prepared for: Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i

Hökūao Water Demand Estimated below 121,700 GPD

The R. M. Towill Corporation Preliminary Engineering Report for the Hōkūao 201H Housing Project included information related to the water demands and supply for the project.

The “Water System Standards” for the four (4) respective counties in Hawai‘i estimates that the Average Daily Demand for water per residential unit (whether single-family or multi-family) in Hawai‘i County is 400 gallons per unit; Kauai – 500 gallons/unit; Maui – 600 gallons/unit and Oahu – 500 gallons/unit.

Conformance with the County standards provides accepted criteria for water system planning and design, although the water system, inclusive of water source, storage, and piping, will remain privately-owned and will not be subject to all County requirements.

Using the County of Maui Department of Water Supply Standards of 600 gallons per day per single-family unit and 1,700 gallons per acre for a park as guides, the proposed average daily domestic water demand for the 200 single-family units and the 1-acre park with future 1,500 square foot pavilion with comfort stations and parking is estimated to be 121,700 GPD. As previously mentioned, the project has been adjusted to 150 homes versus the 200 homes that the calculations were based on, as such, the estimated water demand is expected to be lower than the calculated 121,700 GPD.

The Lāna‘i Water Company has indicated that:

...the project will have a long-term, reliable supply of water in accordance with Chapter 14.12, Water Availability, Maui Code, upon completion of new source development.

The Lāna‘i Company is in the process of permitting the development of Well #7 which is anticipated to be the source of water for the project.

This estimated demand of 121,700 GPD plus recent 12-month moving average for the entire island of 1.60 MGD (Mar 2020) results in total estimated overall usage of approximately 1.721 MGD.

Water Supply for Hōkūao 201H Housing Project

Well 7 was drilled in 1987, and will be the water source for the Hōkūao project. Well 7 is at ground level of 2,100 feet; the well depth is 1,650 feet.

The well is expected to average sustainable pumping of 300,000 GPD; as noted in the following, the estimated water demand is lower than 121,700 GPD. The project fits within the Lānaʻi WUDP.

Well 7 has never been in regular use. Activating and using Well 7 has been identified as the planned source for domestic water needs at Hōkūao 201H Housing Project.

This is consistent with the Lānaʻi WUDP that included in its examination of new supply resource options the recommissioning of Well 7 in the Leeward Aquifer.

As noted in the Lānaʻi WUDP, “Well 7 could provide both reliability and improved distribution of withdrawals on the north end of the Leeward aquifer. Well 7 has the advantage of being situated such that, with transmission improvements, it could serve either Lānaʻi City or the Irrigation Grid.” See **Figure 9**.

Proposed Water Supply and Distribution System

The Lānaʻi Water Company privately owns the domestic water system servicing the proposed project. The existing regional schematic water system consists of a 12-inch waterline on Fraser Avenue.

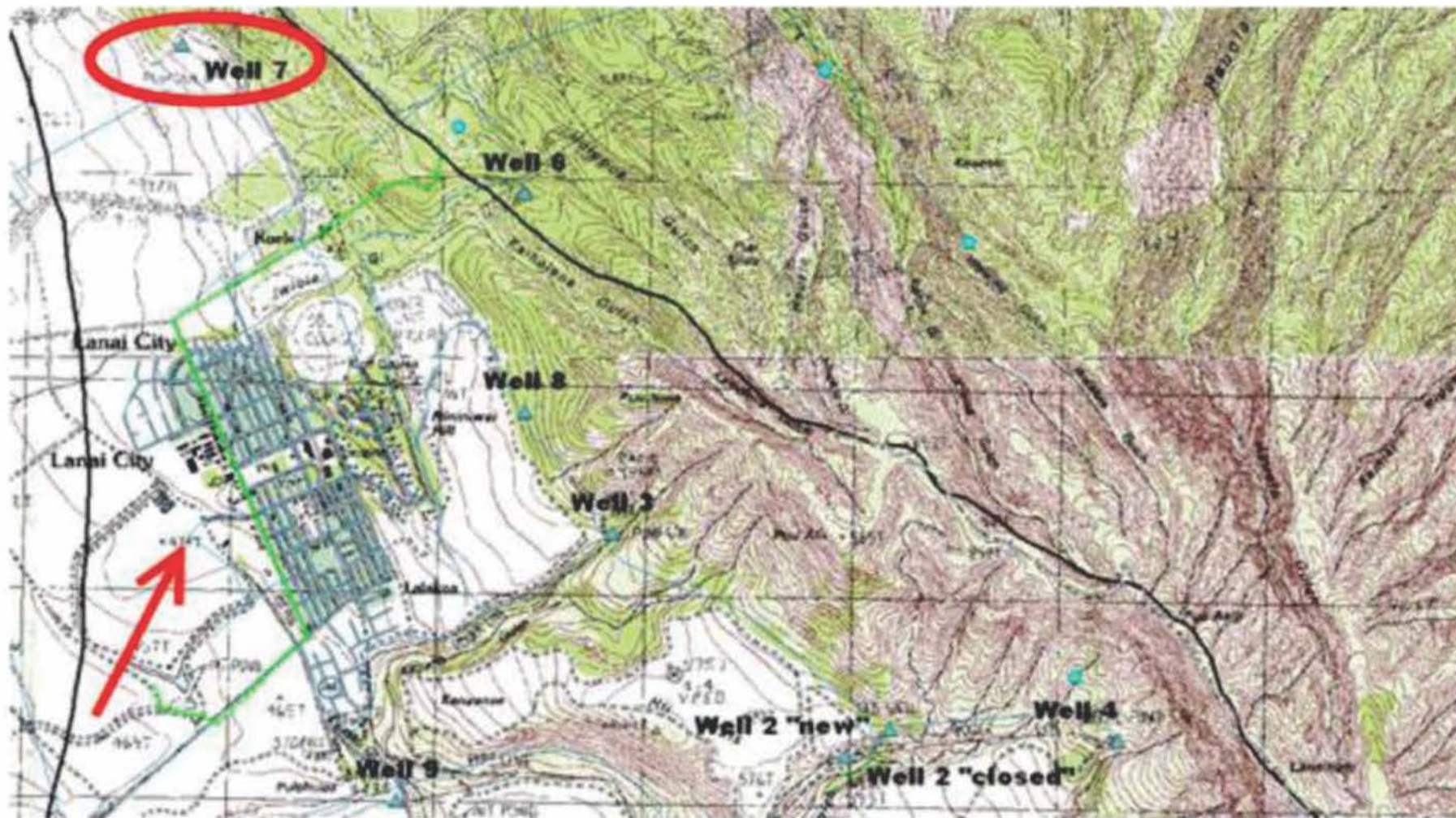
The existing domestic water system will provide water service to the project through a new connection to the 12-inch water main on Fraser Avenue.

Proposed water distribution mains along the new roads will be 8-inch to 12-inch in diameter to ensure adequate fire protection flows can be provided. Water pressure exceeds 80 psi in some areas of this system and individual pressure reducing valves are required. Refer to **Appendix “I”**.

Addressing Water Demands for Other Proposed Developments

The Lānaʻi Community Plan, approved in 2016, identifies a number of additional proposed projects across the Island.

The Draft Environmental Assessment for the Hōkūao 201H Housing Project provides further discussion about near-term anticipated water demands. This includes projects in the process of land entitlements or have been discussed at monthly community information meetings hosted by Pūlama Lānaʻi and have not been submitted to agencies for permitting and entitlement. Refer to **Appendix “I-1”**.



Mapping noting Well 7 (red ellipse) and general location of the Hōkūāo 201H Housing Project (red arrow)

Source: Peter Young, Ho'okuleana LLC. Hōkūāo 201H Housing Project Draft Environmental Assessment (October 2020)

Figure 9

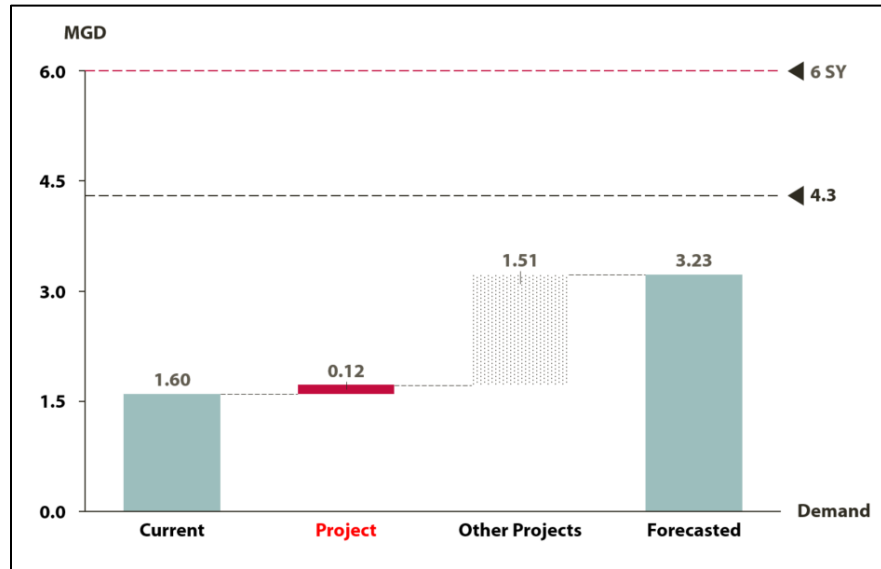
Hōkūāo 201H Housing Project Well 7 Location Map

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Table 3. Forecasted Daily Demand



Graphical representation of the current, estimated project, estimated other projects, and forecasted daily water demand in comparison to the 4.3 MGD trigger set by the Water Commission and the island's SY of 6 MGD. Source: Pūlama Lāna'i, 2020.

b. Potential Impacts and Mitigation Measures

Pūlama Lāna'i has made significant progress in reduction of leaks, conservation efforts, and changes to existing projects resulting in reduced water demands and usage.

Amendments have also been recently proposed to the Kō'ele Project District to reduce its scale, densities, and number of units. A reduction in the number of hotel units at Mānele Hotel was completed as part of the recent refresh of the resort.

Likewise, at Mānele, Pūlama Lāna'i reduced the irrigation and pool water usage for the pool area changes. They changed types of plantings and left large areas to be in a natural state, rather than grass; so there is no irrigation needed. The pool area uses artificial turf rather than grass and Mānele has two (2) pools, rather than the proposed three (3).

With the activation of Well 7 by Lanai Water Company, the proposed project will have access to a reliable long-term supply of water for the project. Additionally, as previously noted, with the anticipated water demand for the Hokuao 201H Housing project, the island of Lāna'i will still be well below the 4.3 MGD limit set by the CWRM.

3. Wastewater

a. Existing Conditions

Lānaʻi's municipal wastewater collection system is situated in and around Lānaʻi City. See **Figure 10**.

Based on as-built plans of the Lānaʻi Sewerage System and Waialua Annex Subdivision, sewer mains are located in Fraser Avenue, as well as the County's major sewer collector lines which are located through the proposed project. Existing 10-inch and 12-inch sewerlines route sewage from the existing residential subdivision along Fifth Street to the 15-inch interceptor sewer which discharges to the wastewater reclamation facility west of the project site. Refer to **Appendix "I"**.

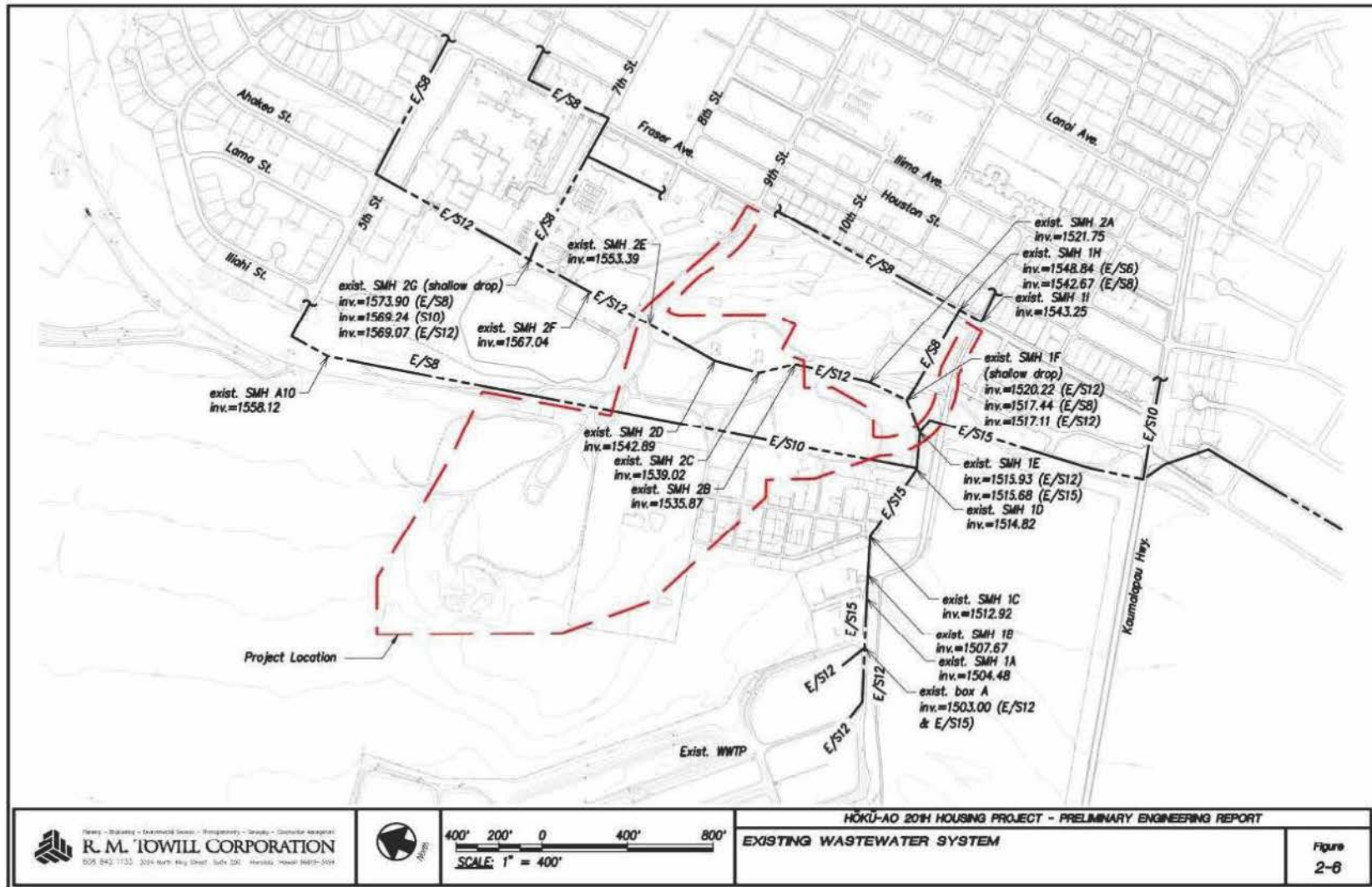
The existing main along Fraser Avenue consists of an 8-inch pipe of unidentified material, and the collector lines are a 10-inch vitrified clay pipe, and a 12-inch pipe of unidentified material. The 8-inch main serves the portion of Lānaʻi City below Ilima Avenue, between Eighth and Twelfth Streets. The 10-inch collector line serves the entire half of Lānaʻi City to the north of Seventh Street. The 12-inch collector line serves the western portion of Lānaʻi City, below Fraser Avenue. The collector lines merge and flow to the Lānaʻi Wastewater Reclamation Facility (WWRF).

The existing 10-inch and 12-inch collector lines will need to be relocated within proposed street right-of-ways and connected back to the 15-inch interceptor sewer going to the WWRF. Easements within privately owned residential lots will not be accepted by the County.

Per the County's Department of Environmental Management, Wastewater Reclamation Division, the capacity of the Lānaʻi WWRF is 0.50 million gallons per day (MGD). The actual average daily flow is approximately 0.315 MGD, and additional allocations totaling .080 MGD have been granted to existing development, for a total allocation of 0.395 MGD. The project is located just north of the boundary of the WWRF.

Pūlama Lānaʻi will conform with the requirements of Department of Health and County of Maui as they relate to installation, inspection and maintenance of individual wastewater systems in handling wastewater on the site.

On the western flank, the project sets back from the existing wastewater treatment plant with a 600 foot buffer between the closest lot and the WWTP edge.



Source: Peter Young, Ho'okuleana LLC. Hōkūāo 201H Housing Project Draft Environmental Assessment (October 2020)

Figure 10

Hōkūāo 201H Housing Project Existing Wastewater System

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The proposed wastewater demand estimates and wastewater system design were derived from the County of Maui's Wastewater Reclamation Division WWRD Flow Standards (Reference 6), or WWRD approved Sewer Studies for similar facilities where practicable.

Per capita usage set at 80 GPD for single-family or duplex based on County of Maui Standards of the Water Reclamation Division (Standards use 4 capita per single-family or duplex unit which equates to 320 gallons per day per unit). Per capita usage set at 5 for park and capita per car set at 4 based on the approved Central Maui Regional Park Sewer Study (the park study used 4 capita per vehicle which equated to 20 gallons per day per parking stall and 50 percent usage at any given time).

Based on the proposed 200 single-family unit and a 1-acre park with the future 1,500 square foot pavilion with comfort stations and 60 parking stalls, using the design standard of 4 persons per single-family unit at 80 gallons per capita per day and 20 gallons per parking stall, the proposed average wastewater demand generated by the project is estimated at 0.064 MGD for the single-family units and 0.02 MGD for the park or 0.066 MGD. This estimate is used for the hydraulic calculations.

As previously mentioned, the project has been adjusted to 150 homes versus the 200 homes that the calculations were based on, as such, the estimated wastewater usage per day is expected to be lower than the calculated 0.064 MGD.

The 20 gallons per parking stall used to estimate the wastewater demand was approved by the County of Maui for the Central Maui Regional Park (CMRP) and is based on 4 persons per vehicle and 5 gallons per capita. The CMRP also estimated that no more than 50 percent of the parking would be in use at any time so a 50 percent reduction in wastewater demand was allowed. As most of the parking is for non-park use, a conservative average wastewater demand for the park is 0.001 MGD at the treatment plant is estimated at 0.065 MGD.

The new onsite wastewater system will collect wastewater generated by the new homes and convey the wastewater to the existing Lāna'i Wastewater Reclamation Facility. The new wastewater collection system will be designed for the residential units and the future park, pavilion and parking stalls and constructed within the new roads.

The wastewater demand of the project is estimated to be lower than 0.065 MGD of which 0.064 MGD is for the proposed housing demand and 0.001 MGD is for the 1-acre park demand. The Preliminary Engineering Report

Lānaʻi City Auxiliary Wastewater Treatment Facility report done in 1993 by Belt Collins & Associates states that the Lānaʻi City Wastewater Treatment Plant was designed to treat wastewater generated by Lānaʻi City and the Koele Project District.

The Lānaʻi Wastewater Reclamation Facility is currently servicing an average daily flow of approximately 0.315 MGD. Additional development allocations totaling 0.080 MGD have been granted.

The proposed development will yield an average daily flow of less than .070 MGD, for a total average daily flow of 0.465 MGD, therefore there is currently sufficient capacity at the WWRF to serve the project.

b. Potential Impacts and Mitigation Measures

The new onsite wastewater system will collect wastewater generated by the new homes and convey the wastewater to the existing Lānaʻi WWRF. The new wastewater collection system will be designed for the residential units and the future park, community center and parking stalls. Improvements will be constructed within the new roads. Refer to **Appendix “I”**.

The Lānaʻi Wastewater Reclamation Facility is currently servicing an average daily flow of approximately 0.315 MGD. Additional development allocations totaling 0.080 MGD have been granted.

The proposed development will yield an average daily flow of less than 0.070 MGD, for a total average daily flow of 0.465 MGD, therefore, there is currently sufficient capacity at the WWRF to serve the project.

The project’s civil engineering consultant will coordinate with the Department of Environmental Management (DEM) in regards to the relocation of the previously noted major sewer collector lines which are within the project area. The sewerlines will allow for continued wastewater service to the WWRF.

Pūlama Lānaʻi will conform with the requirements of the County of Maui Department of Environmental Management and other regulatory entities as it relates to installation, inspection and maintenance of wastewater systems associated with the project.

The impact of the proposed project on wastewater infrastructure is anticipated to have a less than significant impact.

4. Drainage

a. Existing Conditions

Most of the project area's topography consists of flat to gently sloping open, patchy forest and scrub lands. An existing drainage swale on the western boundary of the site carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant with a 600-foot buffer between the closest lot and the wastewater facility boundary. Refer to **Appendix "I"**.

The proposed improvements will terrace the land to maintain characteristics which are very similar to the existing conditions. The general terrain of the developed condition will generally conform to the existing terrain, which slopes toward the south, and the tributary drainage area will remain the same as the existing.

Runoff from the land mauka of the project is conveyed by drain pipes and along Fraser Avenue, and streets parallel to Fraser Avenue, to the ditch along Kaumālapa'u Road that turns south, mauka of Manele Road, and which flows to Kapano Gulch. Kapano Gulch runs along the south side of Lāna'i City and drains into two dry, abandoned reservoirs before entering Palawai Basin through a series of abandoned irrigation ditches.

The Palawai Basin is a large plateau area, approximately 4.5 miles in diameter, which floods for prolonged periods of time during the rainy season.

Runoff from the site generally sheet flows to the south-southwest, following the existing ground slope towards the wastewater treatment facility and then towards Kaumālapa'u Highway. The northern areas flow towards Fifth Street.

b. Potential Impacts and Mitigation Measures

The project's Preliminary Engineering Report noted that the 50-year, 1-hour storm, the calculated increase in peak flow is 32.38 cubic feet per second (cfs) to the north towards the extension of Fifth Street and Iwiolo Gulch, 25.52 cfs mauka of the WWRF and 39.87 cfs towards Kaumālapa'u Highway due to the proposed improvements.

Three (3) retention basins will mitigate the increase in runoff and flow and will have no impact on existing regional drainage infrastructure. Other than the wastewater treatment facility, there are no downstream properties that

would be adversely impacted by the resulting increases in runoff. A new swale will direct runoff away from the wastewater treatment facility.

During grading and construction measures will be taken to prevent erosion and soil from leaving the site. Special precaution will be taken to protect the downstream lands from the project sites as well as the existing wastewater facility to the west.

All exposed and graded areas within the project site will be covered with pavements and grass to prevent soil erosion. To provide storm water quality treatment, runoff will continue to be directed into grassed swales or 2 large detention basins prior to discharge off the property.

Applicable law will be followed to minimize soil movement, erosion, compaction and drainage during all project actions.

Surface drainage improvements will consist of shallow cutoff swales between the new residential units and Fraser Avenue to capture as much runoff as possible and direct the flow around the project or into new project drainage systems.

Roadway drains will be provided along the new roadways towards the proposed retention basins. Residential roads will consist of grassed shoulder swales without curb and gutter that route runoff to the underground drainage system. The collector roads along Ninth and Twelfth Streets will consist of curb and gutter and/or grassed swales to route runoff to the underground drainage system.

Both short-term construction and long-term maintenance BMPs will be included in any permit conditions. Implementation of Best Management Practices (BMPs) will ensure that the alterations to the terrain minimize erosion, water quality degradation and other environmental impacts.

With the implementation of the outlined drainage improvements, the proposed 201H housing development will mitigate impacts for project improvements.

5. Electricity, Telephone Systems, and Cable Television Services

a. Existing Conditions

The sole electric utility serving the island of Lānaʻi is Hawaiian Electric Company, Limited (HECO) which operates and is regulated under a tariff approved by the State Public Utilities Commission (PUC). HECO's existing

generation system, on the Island of Lānaʻi, is currently capable of providing approximately 9.4 Megawatts of power (based on HECO's 30 January 2018 Availability of Supply letter). In 2017, peak demand on the Island of Lānaʻi was 5.4 Megawatts.

Hawaiian Telcom (HTCO) operates and is regulated under a tariff approved by the PUC and was the sole provider of telecommunications services until the advent of cable television. Subsequently, Spectrum (fka Oceanic Time Warner Cable), which is not regulated by the State PUC but is a franchisee of the Department of Commerce and Consumer Affairs, has become a competitor to HTCO and, similar to HTCO, can offer broadband, cable television and telephone signals.

It should be noted that at the time the PER was written, the Hōkūao project was intended to be a 200-unit 201H housing development. Refer to **Appendix "I"**. Since then, the unit count has decreased to a 150-unit housing development, nonetheless, the footprint of the development has remained the same. The estimated power and communication requirements should be lower, and the recommendations proposed remain valid.

b. Potential Impacts and Mitigation Measures

The total anticipated electrical demand load for the proposed Lānaʻi 200 Subdivision Development is approximately 1,000 kilo-Volt Amperes (kVA) or 1.0 MVA and is based on a diversified peak demand load of 5 kVA per residential unit.

Hawaiian Electric Co.'s (HECO) on-island distribution system consists of both 2.4 kV and 12.47 kV primary overhead and underground lines. The proposed subdivision would be connected to HECO's 12.47 kV distribution system. Although HECO's Lānaʻi generating facilities have sufficient capacity to support the development, the existing 12.47 kV overhead lines may require upgrades.

A HECO 12.47-2.4 kV substation and incoming and outgoing overhead lines are currently situated within the proposed subdivision footprint. This substation and the 2.4 kV overhead lines currently provide service to the existing Lānaʻi City residences and must be relocated outside of the proposed subdivision prior to development occurring.

HECO has indicated that should this project trigger the required upgrades, some or all of the cost for the upgrades may need be allocated to this

development. HECO cannot indicate what the budget costs might be without further design on their part.

A proposed site for the relocated substation has been submitted to HECO and a budget cost for the relocation is being prepared by HECO to Pūlama Lānaʻi. The overhead poles and lines, for the most part, are covered by a “one-time relocation” clause included in the original Lānaʻi Company grant of easement to HECO.

Proposed alignments for the 12.47 kV lines and a temporary alignment for the 2.4 kV line is proposed to facilitate subdivision roadway construction. Eventually, the 2.4 kV lines are intended to be placed underground within the proposed subdivision.

HECO will require a new grant of easement for the relocated 12.47 kV lines. As a possible alternative, HECO is evaluating whether to up-convert the existing Lānaʻi City distribution system to 12.47 kV which would eliminate the need for the substation relocation and temporary overhead 2.4 kV relocation.

Based on preliminary information received from Pūlama Lānaʻi underground utility infrastructure is proposed for service to the single-family lots and ancillary buildings. It should be noted HECO would require that pad-mounted transformers be installed and may require the installation of one or more pad-mounted switchgears to provide sectionalizing of their underground circuits.

HECO’s underground infrastructure would consist of a combination of 2-inch, 3-inch, 4-inch and 5-inch PVC conduits, encased in concrete jackets and concrete handholes in sizes varying from 2 feet x 4 feet to 6 feet x 11 feet which act as cable pulling and splicing points and transformer and lot service vaults.

Because HECO owns and maintains the street lights on public rights-of-ways within Maui County, it will need to be determined whether HECO would also provide the street lights for this project or whether the project contractor would provide these street lights. Refer to **Appendix “I”**.

If provided under the construction contracts, luminaires selected will be specified with conformance with Act 287 and be designed to minimize glare and provide illumination levels in conformance with requirements imposed by the environmental permitting documents.

Both HTCO's and Charter's on-island distribution system consists of cables attached to the joint utility pole lines or, if underground, cables routed through duct systems for owned and maintained by the respective utility company. The cable types consist of copper, twisted pair, coaxial, and fiber optic cables.

Based on their current practice, both HTCO and Charter will likely extend fiber optic cable infrastructure to provide service to this development. Due to the anticipated revenue anticipated and based on their respective tariff and franchise rules, it is not anticipated that this development would bear any cost for off-site improvements of either HTCO or Charter facilities.

HTCO's and Spectrum's underground infrastructure would consist of a combination of 2-inch and 4-inch conduits with handholes varying in size from 2 feet x 4 feet to 5 feet x 10.5 feet which act as cable pulling and splicing points and lot service vaults.

If necessary HTCO and/or Spectrum may request a hub equipment site which is approximately 8 feet x 8 feet in size. Refer to **Appendix "I"**.

The project is not anticipated to have a significant impact on the electrical, telephone, and cable television infrastructure.

E. CUMULATIVE AND SECONDARY IMPACTS

Cumulative impacts are defined by Title 11, Chapter 200.1, Hawai'i Administrative Rules (HAR), Environmental Impact Statement Rules as:

...the impact on the environment which results from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

A "secondary impact" or "indirect effect" is defined by Title 11, Chapter 200.1, HAR as:

...effects which are caused by the action and later in time or farther removed in distance, but is still reasonably foreseeable.

Another context for analyzing secondary and cumulative impacts is defined by the time horizon within which "reasonably foreseeable" conditions may occur. From a local planning standpoint, the future context for development is established by the Maui County General Plan (General Plan). The General Plan defines parameters for growth. The document plans for the horizon year 2030 and "reasonably foreseeable" conditions may be considered within this future context.

The Maui County General Plan, as set forth in Chapter 2.80.B of the Maui County Code, provides for the update of the County General Plan. The General Plan is a long-term, comprehensive blueprint for the physical, economic, environmental development, and cultural identity of the County through 2030. The components of the General Plan include the following:

- The Countywide Policy Plan provides broad policies and objectives which portrays the desired direction of the County's future. It includes a countywide vision, statement of core principles, and objectives and policies for population, land use, the environment, the economy, and housing.
- The Lāna'i Community Plan (LCP) identifies fostering a robust and diversified economy as a critical component to establishing a sustainable and resilient future for Lāna'i. The LCP explains:

This requires diversifying the tourism industry, supporting agriculture, encouraging new industries, expanding education and support services for small businesses, and providing necessary infrastructure, land, and affordable sea and air transportation options. Lowering energy costs by reducing dependence on fossil fuels and increasing renewable energy is also key to providing stronger economic opportunities and becoming more sustainable.

This will be achieved by increasing the generation and use of renewable energy sources, promoting the use of electric vehicles, and exploring options for biofuels, biodiesel, and waste-to-energy technology. Water resources will be used in a sustainable and economic manner by recycling one hundred percent of wastewater for irrigation and exploring options for reuse of household graywater for lawn and garden irrigation. (LCP, p. 2 12)

- The nine (9) Community Plans provide implementing actions based on consistency with the Countywide Policy Plan and MIP's vision, goals, objectives, and policies.

A discussion of how the proposed project is consistent with specific goals, objectives, and policies of the Countywide Policy Plan, Hawai'i State Plan, and Lāna'i Community Plan (LCP) is presented in Chapter III of this EA document.

Whereas the Countywide Policy Plan covers planning goals and objectives at the broadest levels, the regional Community Plans consider specific regional needs and opportunities:

Communities typically have a range of residential uses, single-family, multi-family in individual and low and even high-rise buildings. Lāna'i City is generally made up of individual homes, with limited multi-family, and no high rises.

In 2012, 97 percent of the land area of Lānaʻi was purchased by Larry Ellison, and Pūlama Lānaʻi was created to manage, preserve and protect Lānaʻi's precious land and natural resources, and to redefine Lānaʻi as a sustainable community.

In Hawaiian, pūlama means to cherish or treasure; Pūlama Lānaʻi seeks to cherish the unique beauty and deep spirit of aloha on Lānaʻi by creating sustainable practices, cultural connections, and economic opportunities that support the island and community.

In keeping with this vision of sustainability, Pūlama Lānaʻi will ensure that implementation of the proposed project will incorporate, to the extent feasible and practicable, measures to promote energy conservation, sustainable design, environmental stewardship, and protection of the area's natural and cultural resources. The nine (9) Community Plans provide implementing actions based on consistency with the Countywide Policy Plan and MIP's vision, goals, objectives, and policies.

The assessment of cumulative and secondary impacts is undertaken in the context of planned growth recommended by the General Plan. As such, the proposed project is located in an area identified to be suitable for urban uses, including multi-family residential development. The assessment of the environmental, historic, cultural, and socio-economic parameters included investigation of background and cumulative conditions pertaining to cultural, traffic and drainage impacts, and mitigative measures to minimize or avoid adverse long-term impacts. The proposed project will provide affordable and market rate homes for rental on Lānaʻi. It is anticipated that a large portion of the future tenants would be existing Lānaʻi residents. The proposed project would provide an opportunity for the existing residents to move to a larger space for their family or to mitigate their multi-generational living situation, if desired.

In summary, the proposed project is not anticipated to have a significant adverse impact on the physical environment and is not anticipated to result in significant adverse secondary or cumulative impacts.

RELATIONSHIP TO
GOVERNMENTAL PLANS,
POLICIES, AND CONTROLS



III. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS

A. STATE LAND USE DISTRICTS

Pursuant to Chapter 205, Hawai'i Revised Statutes (HRS), all lands in the State have been placed into one (1) of four (4) major land use districts by the State Land Use Commission. These land use districts are designated "Urban", "Rural", "Agricultural", and "Conservation". The project site is designated "Urban" and "Agricultural" by the State Land Use Commission. See **Figure 11**. The Applicant proposes to seek approval from the State Land Use Commission through a Section 201H-38, Hawai'i Revised Statutes (HRS), District Boundary Amendment application. Section 201H-38, HRS, promotes the delivery of affordable housing by exempting endorsed projects from "*all statutes, ordinances, charter provisions, and rules of any governmental agency relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of units thereon.*" Pursuant to Chapter 205, HRS, the "Urban" districts shall include uses or activities provided by ordinances or regulations of the County in which the "Urban" district is located. Section E below, outlines the County of Maui's zoning regulations that are applicable to the proposed project.

B. HAWAI'I STATE PLAN

Chapter 226, HRS, also known as the Hawai'i State Plan, is a long-range comprehensive plan which serves as a guide for the future long-term development of the State by identifying goals, objectives, policies, and priorities, as well as implementation mechanisms. The Plan consists of three (3) parts. Part I includes the Overall Theme, Goals, Objectives, and Policies; Part II includes Planning, Coordination, and Implementation; and Part III establishes Priority Guidelines. Part II of the State Plan covers its administrative structure and implementation process. An analysis of the project's applicability to Part I and Part III of the Hawai'i State Plan is provided in **Appendix "J-1"**.

The overall theme of the Hawai'i State Plan is governed by the following general principles.

1. Individual and family self-sufficiency
2. Social and economic mobility
3. Community or social well-being

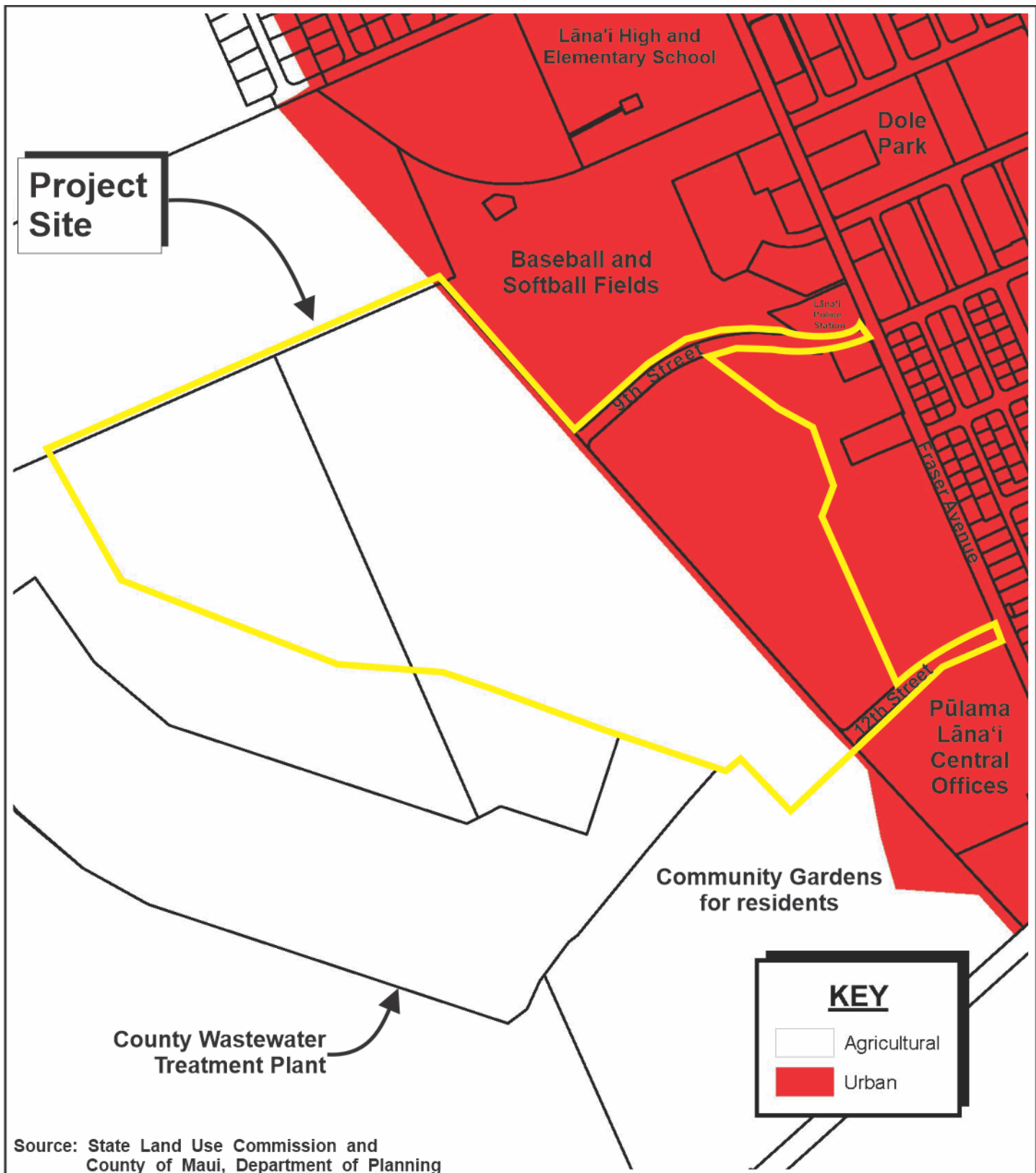
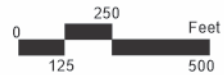


Figure 11 Hōkuaō 201H Housing Project
State Land Use Designation Map



In consonance with the foregoing principles, the Hawai'i State Plan identifies three (3) clarifying goals:

1. A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai'i's present and future generations.
2. A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.
3. Physical, social, and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring, and of participation in community life.

This section of the environmental assessment examines the applicability of the proposed action as it relates to the objectives, policies, and priority guidelines of the Hawai'i State Plan, as set forth in HRS Sections 226-5 through 226-27.

A summary of the project's relationship to the Hawai'i State Plan, as detailed in **Appendix "J-1"** is provided below. The methodology for the analysis involves examining the project's applicability to the Hawai'i State Plan's goals, objectives, and policies. "Applicability" refers to a project's need, purpose and effects, and how these advance or promote a particular set of goals, objectives and priority guidelines. In assessing the relationship between a proposed action and the Hawai'i State Plan, an action may be categorized in one of the following groups:

1. **Directly applicable**: the action and its potential effects directly advances or promotes the objective, policy or priority guideline.

Example: A county project to develop a new water source and related transmission facilities would be directly applicable to the objectives and policies for Facility Systems-Water (HRS 226-16) which states "(5) *Support water supply services to areas experiencing critical water problems*".

2. **Indirectly applicable**: the action and its potential effects indirectly supports or advances the objective, policy or priority guideline.

Example: The county water source project cited above supports other related objectives and policies for the economy (HRS 226-6, General), which, by example, states: "(9) *Strive to achieve a level of construction activity responsive to, and consistent with, state growth objectives*". In this case, the principle purpose of the project was not to create new construction activities, but nonetheless, supports this policy by creating temporary construction activity during the implementation of the

project. In this instance, the proposed action may be deemed to be indirectly applicable to the objective and policy of the Hawai'i State Plan.

3. **Not applicable**: the action and its potential effects have no direct or indirect relationship to the objectives and policies of the Hawai'i State Plan.

Example: That same county water source improvement project referenced above, may not have direct or indirect linkage to objectives and policies for the economy-Federal Expenditures (HRS 226-9) which states: *(1) Encourage the sustained flow of federal expenditures in Hawaii that generates long-term government civilian employment.* From the standpoint of the agency proposing the water system improvement, and assuming no Federal Funding for the project, there is an unlikely intent that the proposed water source project would be connected to or reliant upon the foregoing policy. Hence, from the standpoint judiciously applied policy analysis, the proposed action would be considered not applicable to the policy.

In general, a proposed action's applicability to the objectives, policies and priority guidelines of the Hawai'i State Plan is judged on the basis of the action's direct or indirect relationship to the respective objectives, policies and priority directions. It is recognized that the categorization of "applicability" is subject to interpretation and should be appropriately considered in the context of local and regional conditions.

The assessment presented below summarizes the objective(s) for each policy/planning category of the Hawai'i State Plan, followed by a response which consolidates the assessments provided in **Appendix "J-1"**. The responses examines whether the proposed action is directly applicable, indirectly applicable or not applicable to the respective Hawai'i State Plan objectives, policies and priority guidelines.

HRS 226-4 State Goals

In order to guarantee, for the present and future generations, those elements of choice and mobility that insure that individuals and groups may approach their desired levels of self-reliance and self determination, it shall be the goal of the State to achieve:

1. *A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawaii's present and future generations.*
2. *A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.*
3. *Physical, social, and economic well-being, for individuals and families in Hawaii, that nourishes a sense of community responsibility, of caring, and of participation in community life.*

Response: Residential development of Hōkūao 201H Housing at Lānaʻi City will support the State economy, provide housing opportunities and enhance the social stability and well-being for the people of Lānaʻi.

HRS 226-5 Objective and policies for population

The Hawaii State Plan's objective for population is to guide population growth to be consistent with the achievement of physical, economic, and social objectives of HRS 226.

Response: Residential development of Hōkūao 201H Housing at Lānaʻi City will support the State economy, provide housing opportunities and enhance the social stability and well-being for the people of Lānaʻi.

HRS 226-6 Objectives and policies for the economy--in general

In summary, planning for the State's economy in general shall be directed to increased and diversified employment, income and job choice opportunities, and a growing and diversified economic base.

Response: Residential development of Hōkūao 201H Housing at Lānaʻi City will support the State economy, provide housing opportunities and enhance the social stability and well-being for the people of Lānaʻi.

HRS 226-7 Objectives and Policies for the economy—agriculture

The objectives for agriculture seek to sustain the viability of sugar and pineapple industries, ensure growth and development of diversified agriculture, and ensure that the agriculture industry continues as an essential component of the State's well-being.

Response: Residential development of Hōkūao 201H Housing at Lānaʻi City will support the State economy, provide housing opportunities and enhance the social stability and well-being for the people of Lānaʻi.

The proposed project will utilize agricultural lands for residential development, however, there are large acreages of land available for agricultural purposes on Lānaʻi.

HRS 226-8 Objective and policies for the economy—visitor industry

The visitor industry objective recognizes that the visitor industry constitutes a major component of Hawai'i's steady economic growth.

Response: Residential development of Hōkūao 201H Housing at Lānaʻi City will support the State economy, by providing housing opportunities and enhance the social stability and well-being for the people of Lānaʻi.

However, the objective and policies for the visitor industry are not directly or indirectly applicable to the project.

HRS 226-9 Objective and policies for the economy—federal expenditures

This objective seeks a stable federal investment base as an integral component of Hawai'i's economy.

Response: Residential development of Hōkūāo 201H Housing at Lāna'i City will not involve the expenditure of Federal funds.

HRS 226-10 Objective and policies for the economy—potential growth and innovative activities

The objective for potential growth and innovative activities is directed towards the development and expansion of the economy to increase and diversify Hawai'i's economic base.

Response: Residential development of Hōkūāo 201H Housing at Lāna'i City is not directly or indirectly applicable to the objective and policies for potential growth and innovative activities.

HRS 226-10.5 Objectives and policies for the economy—information industry

The objective for the information industry recognizes that broadband and wireless communication capability and infrastructure are foundations for an innovative economy which will position Hawai'i as a leader in this field in the Pacific region.

Response: Residential development of Hōkūāo 201H Housing at Lāna'i City will have no negative effect on the information industry.

HRS 226-11 Objectives and policies for the physical environment--land-based, shoreline, and marine resources

The objectives for land-based, shoreline, and marine resources seeks the prudent use of land-based, shoreline, and marine resources, and the effective protection of Hawai'i's unique and fragile environmental resources.

Response: The proposed use is similar to surrounding uses. Residential development of Hōkūāo 201H Housing at Lāna'i City will provide housing opportunities, as well as recreational opportunities with a 1-acre park, a 1,500-square foot community center for use by the Lāna'i community, and 60 parking stalls for intermittent parking (e.g., community events at the community center, guests visiting residents of the Hōkūāo residential units, etc.).

HRS 226-12 Objective and policies for the physical environment- scenic, natural beauty, and historic resources

With regard to scenic, natural beauty and historic resources, it is the State's objective to enhance scenic assets, natural beauty and multi-cultural/historical resources.

Response: Residential development of Hōkūao 201H Housing at Lāna'i City will not adversely affect cultural or historic resources. The character of the homes will reflect the existing design vernacular of Lāna'i City. Houses will have hipped roofs, spacious lanais, board and batten siding, large trim profiles, and other design details matching historic Lāna'i City building characteristics. Should any archaeologically significant artifacts, bones, or other indicators be uncovered, Pūlama Lāna'i is committed to strict compliance with State laws and rules. The project site is not part of a scenic corridor and the project will not affect scenic vistas and view planes. The proposed project will not involve significant alteration of the existing topographic character of the site and will not affect public views.

HRS 226-13 Objectives and policies for the physical environment--land, air, and water quality

The objectives for land, air, and water quality is directed at the maintenance and pursuit of improved quality of Hawai'i's land, air and water resources, and greater public awareness and appreciation of Hawai'i's environmental resources.

Response: The proposed use is similar to the surrounding uses and the character of the homes will reflect the existing design vernacular of Lāna'i City. It is anticipated that water will be serviced by connection with the Lāna'i Water Company's water systems.

HRS 226-14 Objective and policies for facility systems—in general

Having water, transportation, waste disposal, and energy and telecommunications systems that support Statewide social, economic, and physical objectives is the focus of this planning category.

Response: The proposed use is similar to the surrounding uses. It is anticipated that water will be serviced through connection with the Lana'i Water Company's water system, wastewater disposal will be treated at the County's Lana'i Wastewater Reclamation Facility, and solid waste disposal will be collected by a private contract service and disposed at the Lana'i Landfill.

HRS 226-15 Objectives and policies for facility systems--solid and liquid wastes

The objectives for solid and liquid waste addresses the maintenance of basic public health and sanitation standards relating to the treatment and disposal of solid and liquid wastes, and the provision of adequate sewerage facilities in keeping with housing, employment, mobility and related needs.

Response: The proposed use is similar to the surrounding uses. The proposed development includes construction of a new onsite wastewater system that will collect wastewater generated by the new homes and convey the wastewater to the existing Lānaʻi Wastewater Reclamation Facility. The new wastewater collection system will be designed for the residential units and the future park, pavilion and parking stalls, and constructed within the new roads. The applicant will conform with the requirements of the Commission on Water Resource Management, Department of Health, County of Maui and other regulatory entities as it relates to installation, inspection and maintenance of water and wastewater systems associated with the project.

HRS 226-16 Objective and policies for facility systems—water

The objective for water is to adequately accommodate domestic, agricultural, commercial, industrial, recreational and related needs within resource capabilities.

Response: The proposed use is similar to the surrounding uses. It is anticipated that water will be serviced through connection with the Lānaʻi Water Company's water system.

HRS 226-17 Objectives and policies for facility systems—transportation

An integrated multi-modal transportation system that meets statewide needs and promotes the efficient, economic, safe and convenient movement of people and goods, and which will accommodate planned growth is the objective for facility systems—transportation.

Responses: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. It is situated adjoining the existing Lānaʻi City.

HRS 226-18 Objectives and policies for facility systems—energy

The objective for energy is multi-pronged, seeking dependable, efficient, and economic statewide energy systems; increased energy security and self-sufficiency; greater diversification of energy generation; reduction, avoidance or sequestration of greenhouse gas emissions, and prioritizing utility customers from a social and financial interest standpoint.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. It is situated adjoining the existing Lānaʻi City. The use of renewable energy and battery storage systems will not only assist in resource protection, but also serve as a demonstration for others.

HRS 226-18.5 Objectives and policies for facility systems—telecommunications

A dependable, efficient and economical statewide telecommunications system along with adequate, reasonably priced, and dependable telecommunications services to accommodate demand are the objectives for telecommunications.

Response: The project site is not served by telecommunication systems, and thus, will not have a negative effect of the State's telecommunication systems.

HRS 226-19 Objectives and policies for socio-cultural advancement--housing

The objectives for housing encompass greater opportunities for Hawai'i's people to secure reasonably priced, safe, sanitary and livable homes; the orderly development of residential areas sensitive to community needs and other land uses; and the development and provision of affordable rental housing.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. It is situated adjoining the existing Lānaʻi City. The project has been designed to reflect the existing architecture and sense of place of Lānaʻi City.

HRS 226-20 Objectives and policies for socio-cultural advancement—health

Fulfillment of basic individual health needs, maintenance of sanitary and environmentally healthful community conditions; and elimination of health disparities by identifying and addressing the social determinants of health are the objectives for health.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. It is situated adjoining the existing Lānaʻi City. The project will conform to all State and County sanitation standards.

HRS 226-21 Objective and policies for socio-cultural advancement—education

The provision of a variety of educational opportunities that enable individuals to fulfill their needs, responsibilities and aspirations is the objective for education.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. The proposed project is not directly or indirectly applicable to the objective and policies for education.

HRS 226-22 Objective and policies for socio-cultural advancement--social services

The objective for social services is improved public and private social services and activities that enables individuals, families and groups to become more self-reliant and confident to improve their well-being.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. The proposed project is not directly or indirectly applicable to the objective and policies for social services.

HRS 226-23 Objective and policies for socio-cultural advancement—leisure

The objective for leisure is the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. The proposed project is not directly or indirectly applicable to the objective and policies for leisure.

HRS 226-24 Objective and policies for socio-cultural advancement--individual rights and personal well-being

The individual rights and personal well-being objective seeks to increase opportunities and protection of individual rights to enable achievement of socio-economic needs and aspirations.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. The proposed project is not directly or indirectly applicable to the objective and policies for individual rights and personal well-being.

HRS 226-25 Objective and policies for socio-cultural advancement--culture

Enhancement of cultural identities, traditions, values, customs, and arts of Hawaiʻi's people reflects the objective for culture.

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. The EA document includes a CIA report which documented the history and culture of the area.

HRS 226-26 Objectives and policies for socio-cultural advancement--public safety

The objectives for public safety seek to provide assurance of public safety and adequate protection of life and property for all people; optimum organizational readiness and capability in emergency management during civil disruptions, wars, natural disasters, and other major disturbance; and promotion of a sense of community responsibility for the welfare and safety of Hawai'i's people.

Response: Hōkūao 201H Housing at Lāna'i City will provide much needed affordable housing, as well as market housing. The proposed project is not directly or indirectly applicable to the objective and policies for public safety.

HRS 226-27 Objectives and policies for socio-cultural advancement--government

The objective for government encompasses efficient, effective and responsive government services and fiscal integrity, and responsibility, and efficiency in state and county governments.

Response: Hōkūao 201H Housing at Lāna'i City will provide much needed affordable housing, as well as market housing. The proposed project will undergo governmental reviews at various stages of the project.

Priority Guidelines

"Priority guidelines" means those guidelines which shall take precedence when addressing areas of statewide concern. This section addresses applicability criteria to the priority guidelines set forth in HRS 226-103.

Priority guidelines of the Hawai'i State Plan covers the economy, population growth and land resources, crime and criminal justice, affordable housing, quality education, sustainability, and climate change adaptation. Applicability assessment for each of the foregoing issue areas are presented below:

1. Economic Priority Guidelines

Response: Overall there will be 687 person-years of employment produced over the course of the project. It will produce an estimated \$52 million in earnings, \$19.5 million in state taxes, and nearly \$7 million in county taxes.

2. Population Growth and Land Resources Priority Guidelines

Response: Residential development of Hōkūao 201H Housing at Lāna'i City conforms with the State Land Use classification of Urban. As

previously noted, a DBA via the HRS 201H-38 process will be sought from the State Land Use Commission.

3. Crime and Criminal Justice Priority Guidelines

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. It is situated adjoining the existing Lānaʻi City.

4. Affordable Housing Priority Guidelines

Response: Hōkūao 201H Housing at Lānaʻi City will provide much needed affordable housing, as well as market housing. It is situated adjoining the existing Lānaʻi City.

5. Quality Education Priority Guidelines

Response: Hōkūao 201H Housing Project at Lānaʻi City is essentially an extension of similar kinds of uses and activities of the adjoining Lānaʻi City. Residential development of Hōkūao 201H Housing at Lānaʻi City will have no negative effect of the educational programs of the State. It is anticipated that many of the future residents at Hōkūao are existing Lānaʻi residents and, as such, the project will not increase the number of students on Lānaʻi. Pūlama Lānaʻi recognizes the importance of education on Lānaʻi and is a strong supporter. Since 2013, Pūlama Lānaʻi has funded various initiatives at Lānaʻi High and Elementary School (LHES), including but not limited to, the very successful dual-credit program with UH Maui College.

6. Sustainability Priority Guidelines

Response: Pūlama Lānaʻi will ensure that the residential development of Hōkūao 201H Housing at Lānaʻi City, incorporate, to the extent feasible and practicable, measures to promote renewable energy generation, electrification of transportation, energy conservation, sustainable design, environmental stewardship, and protection of the area's natural and cultural resources.

7. Climate Change Adaptation Priority Guidelines

Response: The proposed Project indirectly supports the climate change priority guidelines as it will be implemented in an area that is outside of natural landscape features such as flood zones as well as the 3.2-

foot projected sea level rise exposure area in order to avoid impacts related to climate change. In part, the proposed project will help demonstrate appropriate land use and development that supports the State economy and enhances the social stability and well-being for the people of Lānaʻi.

C. STATE FUNCTIONAL PLANS

A key element of the Statewide Planning System is the Functional Plans which set forth the policies, statewide guidelines, and priorities within a specific field of activity. There are 13 Functional Plans which have been developed by the state agency primarily responsible for a given functional area. Together with the County General Plans, the State Functional Plans establish more specific strategies for implementation. In particular, State Functional Plans provide for the following:

- Identify major Statewide priority concerns
- Define current strategies for each functional area
- Identify major relationships among functional areas
- Provide direction and strategies for departmental policies, programs, and priorities
- Provide a guide for the allocation of resources
- Coordinate State and County roles and responsibilities in the implementation of the Hawaiʻi State Plan

Table 4 provides an assessment of the relationship between the proposed action and each of the 13 Functional Plans.

Table 4. Relation Between the Hōkūao 201H Housing Project and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
1	Agriculture Functional Plan (1991)	Department of Agriculture	Continued viability of agriculture throughout the State	The proposed project will be developed on mostly abandoned pineapple fields and vacant lands. Currently on the island of Lānaʻi, there are over 13,000 acres of available agricultural lands. As such, the use of 76 acres, or approximately 0.38 percent, of the available agricultural lands on Lānaʻi, and an even lesser fraction of approximately 0.25 percent of up to 20,000 potentially cultivatable acres for much needed affordable rental housing will not contravene the objectives and policies of this functional plan.
2	Conservation Lands State Functional Plan (1991)	Department of Land and Natural Resources	Addresses issues of population and economic growth and its strain on current natural resources; broadening public use of natural resources while protecting lands and shorelines from overuse; additionally, promotes the aquaculture industry	The proposed project will not utilize any State Conservation lands. Similarly, the project is located inland, and not near the coastline. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
3	Education State Functional Plan (1989)	Department of Education	Improvements to Hawaiʻi's educational curriculum, quality of educational staff, and access to adequate facilities	Lānaʻi is not identified as part of a school impact district, however, Pūlama Lānaʻi has completed a demand analysis and the current demand for the project can be met by existing residents of Lānaʻi. Therefore, it is not anticipated that there will be an additional strain on public school facilities from the project. Pūlama Lānaʻi has also been a strong supporter of improving public education on the island. Since 2013, Pūlama Lānaʻi has funded various initiatives at LHES, including but not limited to, the very successful dual-credit program with UH Maui College. These cumulative annual education contributions to LHES are well in excess of a one-time student impact fee per household for the project and exceeds any assessment for school impact fee for Maui County identified school impact districts (e.g., Wailuku, Makawao, or Lahaina \$/unit). The proposed action is not anticipated to contravene the objectives and policies of this functional plan.

Table 4. Relation Between the Hōkūao 201H Housing Project and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
4	Employment State Functional Plan (1990)	Department of Labor and Industrial Relations	Improve the qualifications, productivity, and effectiveness of the State's workforce through better education and training of workers as well as efficient planning of economic development, employment opportunities, and training activities	The proposed action will result in the creation of construction jobs throughout the development period. This will provide local residents with opportunities to successfully compete in the workforce. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
5	Energy State Functional Plan (1991)	Department of Business, Economic Development and Tourism	Lessen the reliance on petroleum and other fossil fuels in favor of alternative sources of energy so as to keep up with the State's increasing energy demands while also becoming a more sustainable island state; achieving dependable, efficient, and economical statewide energy systems	The proposed project will include site lighting that is low-energy consumptive. Homes will be designed to maximize natural air flow. Homes will incorporate Energy Star fixtures, LED lighting, interior fans and on-demand hot water heaters. Homes will be constructed to include R-19 insulation, solar roof ventilators, and reflective roof heat barriers. Homes may also include solar photovoltaic on-site generation with individual home battery storage systems. The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
6	Health State Functional Plan (1989)	Department of Health	Improve health care system by providing for those who don't have access to private health care providers; increasing preventative health measures; addressing 'quality of care' elements in private and public sectors to cut increasing costs	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
7	Higher Education Functional Plan (1984)	University of Hawai'i	Prepare Hawai'i's citizens for the demands of an increasingly complex world through providing technical and intellectual tools	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
8	Historic Preservation State Functional Plan (1991)	Department of Land and Natural Resources	Preservation of historic properties, records, artifacts and oral histories; provide public with information/education on the ethnic and cultural heritages and history of Hawai'i	A previous archaeological inventory survey (AIS) was done on the 76-acre site. Archaeological monitoring is proposed for project-related ground disturbing activities. Consultation with the State Historic Preservation Division has been initiated pursuant to Chapter 6E, HRS. A Cultural Impact Assessment (CIA) was prepared for the proposed project and concluded that adverse impacts to cultural resources are not anticipated. The proposed action is in consonance with this functional plan.

Table 4. Relation Between the Hōkūao 201H Housing Project and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
9	Housing State Functional Plan (2017)	Hawai'i Housing Finance and Development Corporation	Based largely on joint public/private efforts to finance, build, and maintain an adequate supply of affordable housing. It will be a working tool to guide the State, the counties, as well as the private sector in meeting the overall goal that every Hawai'i resident will have the opportunity to live in a safe, decent and affordable home.	The proposed project provides additional affordable rental housing to households earning up to 140 percent of AMI in close proximity to transit and various public, recreational, and commercial services. In addition, the project will be implemented into a developed area with existing infrastructure and services in Lāna'i City. The proposed action is in consonance with this functional plan.
10	Human Services State Functional Plan (1989)	Department of Human Services	Refining support systems for families and individuals by improving elderly care, increasing preventative measures to combat child/spousal abuse and neglect; providing means for 'self-sufficiency'	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
11	Recreation State Functional Plan (1991)	Department of Land and Natural Resources	Manage the use of recreational resources via addressing issues: (1) ocean and shoreline recreation, (2) mauka, urban, and other recreation opportunities, (3) public access to shoreline and upland recreation areas, (4) resource conservation and management, (5) management of recreation programs/facilities/areas, and (6) wetlands protection and management	The proposed action is not anticipated to contravene the objectives and policies of this functional plan. The proposed project includes a 1-acre park as well as a community center for use by Lana'i residents.
12	Tourism State Functional Plan (1991)	Department of Business, Economic Development and Tourism	Balance tourism/economic growth with environmental and community concerns; development that is cognizant of the limited land and water resources of the islands; maintaining friendly relations between tourists and community members; development of a productive workforce and enhancement of career and employment opportunities in the visitor industry	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
13	Transportation State Functional Plan (1991)	Department of Transportation	Development of a safer, more efficient transportation system that also is consistent with planned physical and	The proposed project will be implemented in proximity to existing State and County roadway facilities. A Traffic Impact Analysis Report (TIAR) has been prepared to assess the projected increase in traffic on these roadways.

Table 4. Relation Between the Hōkūao 201H Housing Project and the State Functional Plans

No.	State Functional Plan	State Coordinating Agency	Purpose	Analysis
			<p>economic growth of the state; construction of facility and infrastructure improvements; develop a transportation system balanced with new alternatives; pursue land use initiatives which help reduce travel demand</p>	<p>The TIAR that was prepared determined that the project will have minimal impact on area roadways. No significant delays or queuing were observed at any of the intersections near the project area during the peak hours of traffic. The traffic analysis also noted that intersection improvements are not recommended as a result of the project.</p>

D. **GENERAL PLAN OF THE COUNTY OF MAUI**

As indicated by the Maui County Charter, the purpose of the general plan shall be to:

... indicate desired population and physical development patterns for each island and region within the county; shall address the unique problems and needs of each island and region; shall explain opportunities and the social, economic, and environmental consequences related to potential developments; and shall set forth the desired sequence, patterns and characteristics of future developments. The general plan shall identify objectives to be achieved, and priorities, policies, and implementing actions to be pursued with respect to population density, land use maps, land use regulations, transportation systems, public and community facility locations, water and sewage systems, visitor destinations, urban design, and other matters related to development.

Chapter 2.80B of the Maui County Code, relating to the General Plan and Community Plans, implements the foregoing Charter provision through enabling legislation which calls for a Countywide Policy Plan and a Maui Island Plan.

1. **Countywide Policy Plan**

The Countywide Policy Plan was adopted in March 2010 and is a comprehensive policy document for the islands of Maui County to the year 2030. The plan replaces the General Plan of the County of Maui 1990 Update and provides the policy framework for the development of the Maui Island Plan as well as for updating the nine (9) detailed Community Plans. The Countywide Policy Plan provides broad goals, objectives, policies and implementing actions that portray the desired direction of the County's future. Goals are intended to describe a desirable condition of the County by the year 2030 and are intentionally general. Objectives tend to be more specific and may be regarded as milestones to achieve the larger goals. Policies are not intended as regulations, but instead provide a general guideline for County decision makers, departments, and collaborating organizations toward the attainment of goals and objectives. Implementing actions are specific tasks, procedures, programs, or techniques that carry out policy. Discussion of the proposed project's applicability to the relevant goals, objectives, policies, and implementing actions of the Countywide Policy Plan is provided in **Appendix "J-2"**.

As with the Hawai'i State Plan, the methodology for assessing a project's relationship to the Countywide Policy Plan involves examining the project's applicability to the Plan's goals, objectives, and policies. "Applicability" refers to a project's need, purpose and effects, and how they advance or promote a particular set of goals, objectives and policies. In assessing the relationship between a

proposed action and the Countywide Policy Plan, an action may be categorized in one of the following groups:

1. **Directly applicable:** the action and its potential effects directly advances, promotes or affects the relevant goal, objective, or policy.

Example: Using the same example as that provided for the Hawai'i State Plan, that of a County project to develop a new water source and related transmission facilities, such an action would be directly applicable to improving physical infrastructure. The relevant objective states: *"Improve water systems to assure access to sustainable, clean, reliable, and affordable sources of water"* (Objective I.1). A policy within this objective category states: *"Ensure that adequate supplies of water are available prior to approval of subdivision or construction documents"* (Policy I.1.a).

In this instance, the proposed action is considered to be directly applicable to the cited objective and policy.

2. **Indirectly applicable:** the action and its potential effects indirectly supports, advances or affects the objective, policy or priority guideline.

Example: The county water source project cited above supports the objective to: *Improve land use management and implement a directed-growth strategy* (Objective J.1). A related policy encompassed by this objective states: *"Direct new development in and around communities with existing infrastructure and service capacity, and protect natural, scenic, shoreline, and cultural resources"* (Policy J.1.h). In this case, the principle purpose of the project is not to create source specifically intended to improve land use management. Nonetheless, the proposed action indirectly supports the Countywide Policy Plan's directives relating to appropriate locations for new development.

3. **Not applicable:** the action and its potential effects have no direct or indirect relationship to the objectives and policies of the Countywide Policy Plan.

Example: The county water source improvement project referenced above, may not have direct or indirect linkage to Objective D.1, which states: *"In cooperation with the Federal and State governments and nonprofit agencies, broaden access to social and healthcare services and expand options to improve the overall wellness of the people of Maui County"*. Hence, from a policy analysis and linkage standpoint, the proposed action would be considered not applicable to this set of objectives and policies.

It is recognized that policy analysis is subject to interpretation and is best considered in the context of the proposed action's local and regional conditions.

The assessment presented below restates the goal for each policy/planning category followed by a response which consolidates and summarizes the assessments provided in **Appendix "J-2"**. The responses examine whether the proposed action is directly applicable, indirectly applicable or not applicable to the respective Countywide Policy Plan objectives, policies and implementing actions.

(A) PROTECT THE NATURAL ENVIRONMENT

Goal:

Maui County's natural environment and distinctive open spaces will be preserved, managed, and cared for in perpetuity.

Response: The proposed project indirectly improves the opportunity for Lāna'i families to experience, live, and thrive in the natural beauty of our island home. This land will be managed and maintained for years to come while also providing much needed affordable housing. The project has been carefully designed taking into consideration building profiles and massing so as to not adversely impact scenic views and vistas. The proposed buildings will blend into the surrounding urban landscape.

The proposed project will utilize BMPs to ensure that natural resources such as the coastal environment is not impacted by construction activities. The use of BMPs also ensures compatibility between land-based and water-based functions, resources, and ecological systems. The biological resources study conducted as part of the environmental review process represents an effort to protect any rare and endangered plant and animal species, and their habitats that may be present in the vicinity of the proposed action.

(B) PRESERVE LOCAL CULTURES AND TRADITIONS

Goal:

Maui County will foster a spirit of pono and protect, perpetuate, and reinvigorate its residents' multi-cultural values and traditions to ensure that current and future generations will enjoy the benefits of their rich island heritage.

Response: This development is an appropriate development in an area away from culturally sensitive areas. A CIA was prepared for the proposed project as part of the environmental review process. The CIA fosters increased knowledge of native Hawaiian cultural practices, as well as the history of the project area. In this context, the proposed action advances the objective and policies related to preserving local cultures and traditions.

Archaeological investigations were conducted and archaeological monitoring will be carried out during ground altering activities to ensure no historic or cultural properties are adversely impacted. Consultation is ongoing with the State Historic Preservation Division pursuant to Chapter 6E, HRS.

(C) IMPROVE EDUCATION

Goal:

Residents will have access to lifelong formal and informal educational options enabling them to realize their ambitions.

Response: Lānaʻi is not identified as part of a school impact district, however, Pūlama Lānaʻi has completed a demand analysis and the current demand for the project can be met by existing residents of Lānaʻi. Therefore, it is not anticipated that there will be an additional strain on public school facilities from the project. Pūlama Lānaʻi has also been a strong supporter of improving public education on the island. Since 2013, Pūlama Lānaʻi has funded various initiatives at LHES, including but not limited to, the very successful dual-credit program with UH Maui College. These cumulative annual education contributions to LHES are well in excess of a one-time student impact fee per household for the project and exceeds any assessment for school impact fee for Maui County identified school impact districts (e.g., Wailuku, Makawao, or Lahaina \$/unit). The proposed project will afford many families the opportunity to be closer in proximity to schools and services that can support their educational experience.

(D) **STRENGTHEN SOCIAL AND HEALTHCARE SERVICES**

Goal:

Health and social services in Maui County will fully and comprehensively serve all segments of the population.

Response: Indirectly, this proposed project will support access to services. By providing affordable housing to families in a centrally located area, they will have easier access to utilize social and healthcare services, if needed.

(E) **EXPAND HOUSING OPPORTUNITIES FOR RESIDENTS**

Goal:

Quality, island-appropriate housing will be available to all residents.

Response: The proposed project provides additional affordable rental housing opportunities for Lānaʻi families in an area that is close to businesses, school, and government services. In addition, the project will be implemented in proximity to a developed area with existing infrastructure and services on Lānaʻi.

(F) **STRENGTHEN THE LOCAL ECONOMY**

Goal:

Maui County's economy will be diverse, sustainable, and supportive of community values.

Response: During construction, the proposed project will provide job opportunities. After completion, families residing in the project will support the businesses surrounding them, thus indirectly impacting the economy in a positive way.

(G) **IMPROVE PARKS AND PUBLIC FACILITIES**

Goal:

A full range of island-appropriate public facilities and recreational opportunities will be provided to improve the quality of life for residents and visitors.

Response: The proposed residential project will indirectly support the goal, objective, and policies of expanding access to recreational opportunities and community facilities to meet the needs of residents. The central location of the site of this project will provide easy access to existing recreational activities and community facilities. The project will also incorporate an onsite 1-acre park and multi-purpose building for residents.

(H) DIVERSIFY TRANSPORTATION OPTIONS

Goal:

Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Response: The TIAR prepared for this project determined that the impact of this project on existing and projected traffic is minimal. No significant delays or queuing were observed at any of the intersections near the project area during the peak hours of traffic. The traffic analysis noted that intersection improvements are not recommended as a result of the project.

(I) IMPROVE PHYSICAL INFRASTRUCTURE

Goal:

Maui County's physical infrastructure will be maintained in optimum condition and will provide for and effectively serve the needs of the County through clean and sustainable technologies.

Response: The proposed project indirectly supports the physical infrastructure objective and related policies as it is located in an area that is serviced by existing private (Lana'i Water Company) water and County wastewater infrastructure. Coordination will be undertaken with the DEM regarding wastewater connection. Construction waste will be disposed at the Lāna'i Landfill or appropriate construction recycling centers located off-island. The proposed project will include site lighting that is low-energy consumptive. Homes may also include solar photovoltaic on-site generation with individual home battery storage systems.

(J) **PROMOTE SUSTAINABLE LAND USE AND GROWTH MANAGEMENT**

Goal:

Community character, lifestyles, economies, and natural assets will be preserved by managing growth and using land in a sustainable manner.

Response: The proposed project will be developed on vacant land on Lānaʻi, within the “Park”, “Open Space”, “Road”, “Mixed-Use Residential”, and “Public/Quasi-Public” as designated by the Lānaʻi Community Plan. The project is located in a developed area in Lānaʻi City, in proximity to existing infrastructure and services. The project will be developed in an area outside of the projected 3.2-foot sea level rise exposure area.

The proposed project was designed to reflect the character of Lānaʻi City including street scape and architecture of the homes. Additionally, sustainable design features are included in the proposed home design including use of natural elements (ventilation, shading, etc.) and use of ENERGY STAR appliances and energy efficient features.

(K) **STRIVE FOR GOOD GOVERNANCE**

Goal:

Government services will be transparent, effective, efficient, and responsive to the needs of residents.

Response: The permitting and environmental review processes involves opportunities for the public to provide input throughout the environmental review process and the Section 201H-38, HRS, affordable housing approval process. Public meetings and requests for comments were included, pursuant to the environmental assessment review process, which provided the opportunity for public for engagement and feedback opportunities. The Lānaʻi Planning Commission provided comments on the Draft EA for the project at its January 20, 2021 meeting and the most recent community meeting on the project was held virtually on February 22, 2021. See **Appendix “K”**.

2. **Lānaʻi Community Plan**

The project site is located in the Lānaʻi Community Plan region which is one (1) of nine (9) Community Plan regions established in the County of Maui. Planning for each region is guided by the respective Community Plans, which are designed to implement the Maui County General Plan. Each Community Plan contains recommendations and standards which guide the sequencing, patterns, and characteristics of future development in the region.

The Lānaʻi Community Plan was adopted by the County of Maui through Ordinance No. 4343 which took effect on July 26, 2016.

Land use guidelines are set forth by the Lānaʻi Community Plan Land Use Map. See **Figure 12**. The project site is designated as “Park”, “Open Space” and a small portion of “Public/Quasi-Public”, and “Mixed-Use Residential” by the Community Plan. The project is consistent with the following objectives and policies of the Lānaʻi Community Plan:

CULTURAL, HISTORIC, AND SCENIC RESOURCES

Goal: Lānaʻi’s diverse cultural, archaeological, and historic resources and practices, and scenic resources will be protected for future generations.

Policy:

9. Require developments to mitigate their impacts on historic, cultural, natural, and scenic resources.

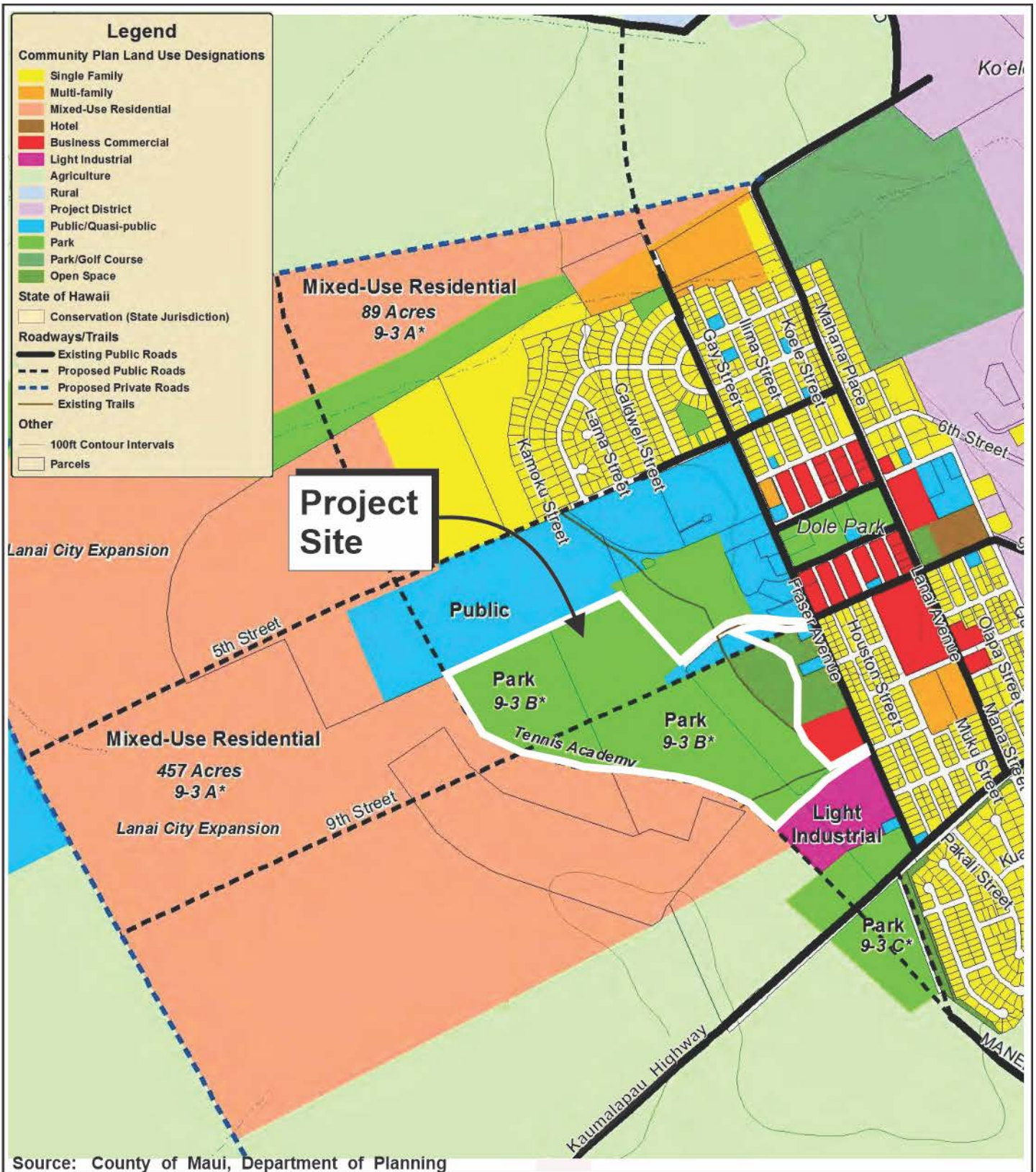
Analysis: The proposed project has been designed so as to not impede scenic views from upland areas. Furthermore, a Chapter 6E, HRS submittal has been prepared and submitted to the State Historic Preservation Division (SHPD) with a recommendation that archaeological monitoring occur during ground altering activities. The Applicant will abide by the recommendations and requirements from the SHPD.

INFRASTRUCTURE AND UTILITIES (ENERGY)

Goal: Lānaʻi will have a sufficient supply of potable and non potable water provided in an environmentally sustainable and cost effective manner.

Policy:

1. Improve the long term efficiency reliability and capacity of the island's water infrastructure.



Source: County of Maui, Department of Planning

Figure 12 Hōkuaō 201H Housing Project
Lāna'i Community Plan Map

NOT TO SCALE



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability Company doing business as Pūlama Lāna'i



Analysis: As previously noted in Chapter 2 of this EA document, there are a variety of water sources that Lanai Water Company can utilize for the proposed project, including recommissioning Well #7. Additionally, water conservation efforts are being applied island-wide for the Applicant's projects. To the extent feasible, water efficient fixtures will also be utilized for the proposed project.

Goal: An efficient effective and environmentally sound wastewater system that meets the population's needs.

Policy:

1. Provide a sustainable and sufficient level of wastewater service that complies with environmental regulations.

Analysis: The proposed development includes construction of a new onsite wastewater system that will collect wastewater generated by the new homes and convey the wastewater to the existing Lānaʻi Wastewater Reclamation Facility. The new wastewater collection system will be designed for the residential units and the future park, community center, and parking stalls and constructed within the new roads. The applicant will conform with the requirements of the Commission on Water Resource Management, Department of Health, County of Maui and other regulatory entities as it relates to installation, inspection and maintenance of water and wastewater systems associated with the project.

Goal: Efficient environmentally sound and comprehensive solid waste management that aids residents and businesses on Lānaʻi to effectively reduce reuse and recycle as much as possible.

Policy:

1. Reduce the amount of solid waste that is sent to the landfill through effective waste reduction and recycling programs.

Analysis: During the initial short-term construction phase of the proposed development, the contractor will develop and implement a construction-generated waste disposal plan. Pūlama Lānaʻi will contract with a private entity (e.g., Maui Disposal) for solid waste residential pick up for residents in the project. The Applicant sponsors rural recycling collection events for hard to recycle items including: appliances, small scrap metal, vehicle batteries and tires, and provides green waste recycling with subsequent compost available to residents. The Applicant also partners with the County on recycling programs for computers/electronics and household batteries.

Goal: Increase the proportion of electricity that is generated from renewable sources to reduce electricity costs and Lānaʻi's dependence on fossil fuels.

Policy:

1. *Support the increased use of renewable energy sources.*

Analysis: The proposed development features homes constructed to include R-19 insulation, solar roof ventilators, and reflective roof heat barriers. Homes may also include solar photovoltaic on-site generation with individual home battery storage systems. Where appropriate and to the extent feasible and practicable, the project will utilize EPA ENERGY STAR Program concepts in the master planning and development of the project.

LAND USE

Goal: Lānaʻi will have an efficient and sustainable land use pattern that protects agricultural lands, open space, natural systems, and rural and urban character.

Policy:

2. *Limit new residential, commercial, or industrial development to existing communities and proposed expansion areas as shown on the Lānaʻi Community Plan land use maps.*

Analysis: The proposed development will seek an exemption from the CPA and CIZ requirements in order to provide much needed residential housing for the island of Lānaʻi. The 201H application process provides for an opportunity to expedite the provision of housing through the exemption of State and County regulations that do not compromise public health and safety.

Goal: A diverse supply of housing that meets the needs of all Lānaʻi residents.

Policy:

1. *Support regulations to keep all affordable housing affordable in perpetuity.*

Analysis: The development's 76 affordable rental units are proposed to remain affordable in perpetuity.

Policy:

2. *Expedite the permit process for housing projects that are safe, affordable, environmentally sustainable and community oriented.*

Analysis: The proposed project is sited close to Dole Park to take advantage of its walkable proximity to shops, groceries, educational, and entertainment venues. Hōkūāo is designed to perpetuate the site-planning and architectural character already present throughout Lānaʻi City. This plantation town, and with a unique town center seen nowhere else in the islands, has strong and attractive vernacular and serves as the design basis for Hōkūāo. The location was ideal because it provided accessibility to the school and center of town. The incorporation of walking and bike paths, a community pavilion and comfort stations, park, and extra parking areas were positive amenities of the project design.

Policy:

5. Encourage development of a mix of quality multifamily and single-family housing units to expand housing choices and price points.

Analysis: The proposed action includes 76 2-bedroom affordable rental housing units to households with incomes at or below 140 percent of the area median income (AMI). The proposed action also includes 74 market rate lease units.

E. COUNTY ZONING

The land underlying the proposed project site are zoned “Interim”, “Open Space”, “Active Open Space”, “Road” and “Agricultural” by the Maui County Zoning. See **Figure 13**. As noted previously, the Section 201H-38, HRS, approval will allow the Applicant to amend or waive certain conditions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of the units thereon. Among exemptions, the Applicant will be seeking exemptions from the Change of Zoning (CIZ) approval processes, as well as County requirements, including public infrastructure and design standard elements. The exemption will allow the project to proceed with the “Single Family” and “Park” uses as proposed. Discussion of the Section 201H-38, HRS, exemptions from the Maui County Code (MCC) is provided in Section H of this Chapter.

F. PROPOSED SECTION 201H-38, HRS, EXEMPTIONS FROM THE MAUI COUNTY CODE (MCC)

The Applicant will be seeking an affordable housing approval from the Maui County Council pursuant to Section 201H-38 of the Hawai‘I Revised Statutes (HRS). The Section 201H application process will allow exemptions relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of dwelling units thereon to support the development of affordable housing. The proposed

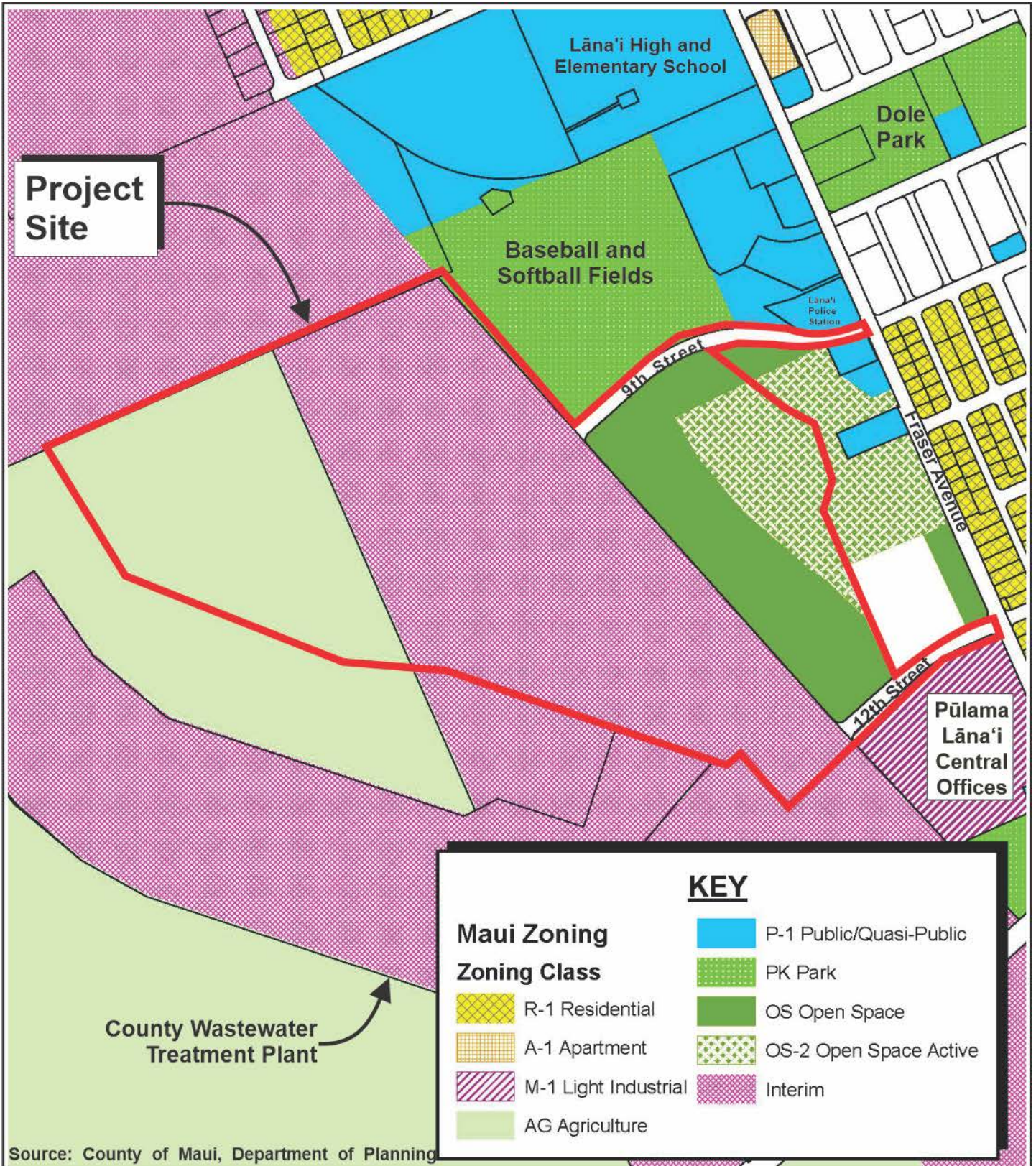
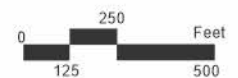


Figure 13 Hōkuaō 201H Housing Project
Maui County Zoning Map



Prepared for: Lanai Resorts LLC, a Hawaii Limited Liability Company doing business as Pūlama Lāna'i



exemptions that will be requested as part of the Section 201H approval are presented below.

Proposed Section 201H-38, HRS, Exemptions from the MCC

1. Exemptions from Title 2, MCC, Administration And Personnel

- a. An exemption from Chapter 2.80B, MCC, General Plan and Community Plans, shall be granted to permit the project to proceed without obtaining a community plan amendment. The project site is designated as “Park”, “Open Space” and/or OS-1 and/or OS-2, “Mixed-Use Residential”, and “Public/ Quasi-public” in the Lāna‘i Community Plan Map. The exemption will allow the project to proceed with the “Single Family” and “Park” uses as proposed.

2. Exemption from Title 12, Streets, Sidewalks And Public Places

- a. Exemption from Section 12.24A.070D MCC, Planting of Street Trees, shall be granted to allow flexibility in the number, species, and location of street trees in the Hōkūao Housing project. The Conceptual Landscape Plan prepared by a licensed architect, attached here as **Exhibit “A”**, shall be reviewed by the Department of Public Works prior to approval.

3. Exemptions from Title 16, MCC, Buildings And Construction

- a. An exemption from Chapters 16.04C, MCC, Fire Code, 16.18B, Electrical Code, 16.20B, Plumbing Code, and 16.26B, Building Code, shall be granted to exempt the 76 affordable housing units from fire, electrical, plumbing, and building permit fees, as well as plan review and inspection fees. This exemption shall not apply to the market-rate units in the project.
- b. The project shall conform to Chapters 16.04C, MCC, Fire Code, 16.08A, Residential Code, and 16.26B, Building Code, as stated at the time of the filing of the 201H-38 application, despite any subsequent amendments to Chapters 16.04C, 16.08A, or 16.26B, MCC, or any updates to the Fire Code, Residential Code, or Building Code adopted prior to the issuance of the last building permit for the project.

4. Exemptions from Title 18, MCC, Subdivisions

- a. An exemption from Section 18.04.030, MCC, Administration, and related land use consistency and conformity requirements of Title 18, shall be granted to exempt the project from obtaining a change in zoning and/or



Hokuao Homes 201H Housing

Landscape Amenities Plan

02/16/2021



EXHIBIT "A"

community plan amendment to enable subdivision approval and for the project to be developed to the standards outlined in this exemption list.

- b. An exemption from Section 18.16.050, MCC, Minimum Right of Way and Pavement Widths, shall be granted to allow the following roadway standards within the project:
- 41 ft. right of way with 20 ft. of pavement at Ninth Street and Fraser Avenue, and for approximately 250 ft. along the Ninth Street Extension, then 50 ft. right of way with 20 ft. of pavement for the balance of Ninth Street Extension. 20 ft. of pavement and 10 ft. of paved parallel parking spaces for all interior roadways. 50 ft. right of way with 20 ft. of pavement for the Twelfth Street Extension from Fraser Avenue.

The proposed exemption will allow the roads within the residential development to mirror the existing roadways within Lānaʻi City. Further, the proposed roadway standards meet the Complete Streets format for “Country Road” as well as meet the policies of the Lānaʻi Community Plan to provide complete and safe streets and maintain and enhance Lānaʻi City’s rural character.

- c. An exemption from Section 18.16.320, MCC, Parks and Playgrounds, shall be granted. The project shall contain a 1-acre park in addition to the community center and comfort stations, totaling 2.10 acres. The park shall be open to the public and privately owned and maintained.
- d. An exemption from Section 18.16.320 (3), MCC, Parks and Playgrounds, shall be granted to exempt the project from the requirement to enter into a park assessment agreement.
- e. An exemption from Section 18.20.070, MCC, Sidewalks, shall be granted to allow the following sidewalk standards within the project:
- 5.5 feet sidewalk starting from Ninth Street and Fraser Avenue for approximately 250 feet, then to a 7.5 ft. wide sidewalk for the balance of the Ninth Street Extension. 8 feet wide sidewalk for the Twelfth Street Extension from Fraser Avenue to the project roadways.
- f. An exemption from Section 18.20.080, MCC, Curbs and Gutters, shall be granted to allow grass swales within the Project.

5. **Exemptions from Title 19, MCC, Zoning**

- a. An exemption from Chapter 19.02A, MCC, Interim Zoning; Chapter 19.07 Open Space Districts; and Chapter 19.30A, Agriculture District; shall be granted to permit the development and use of the parcel for single-family and park purposes, including supporting infrastructure requirements. Further, this exemption shall allow the subdivision of the property in the conceptual plat configuration shown in **Exhibit “B”**, which may be amended by the Director of Public Works. The following zoning standards shall apply to the proposed development.

It is further noted that the proposed uses described below will be limited to the Residential and Park areas indicated in **Exhibit “B”**.

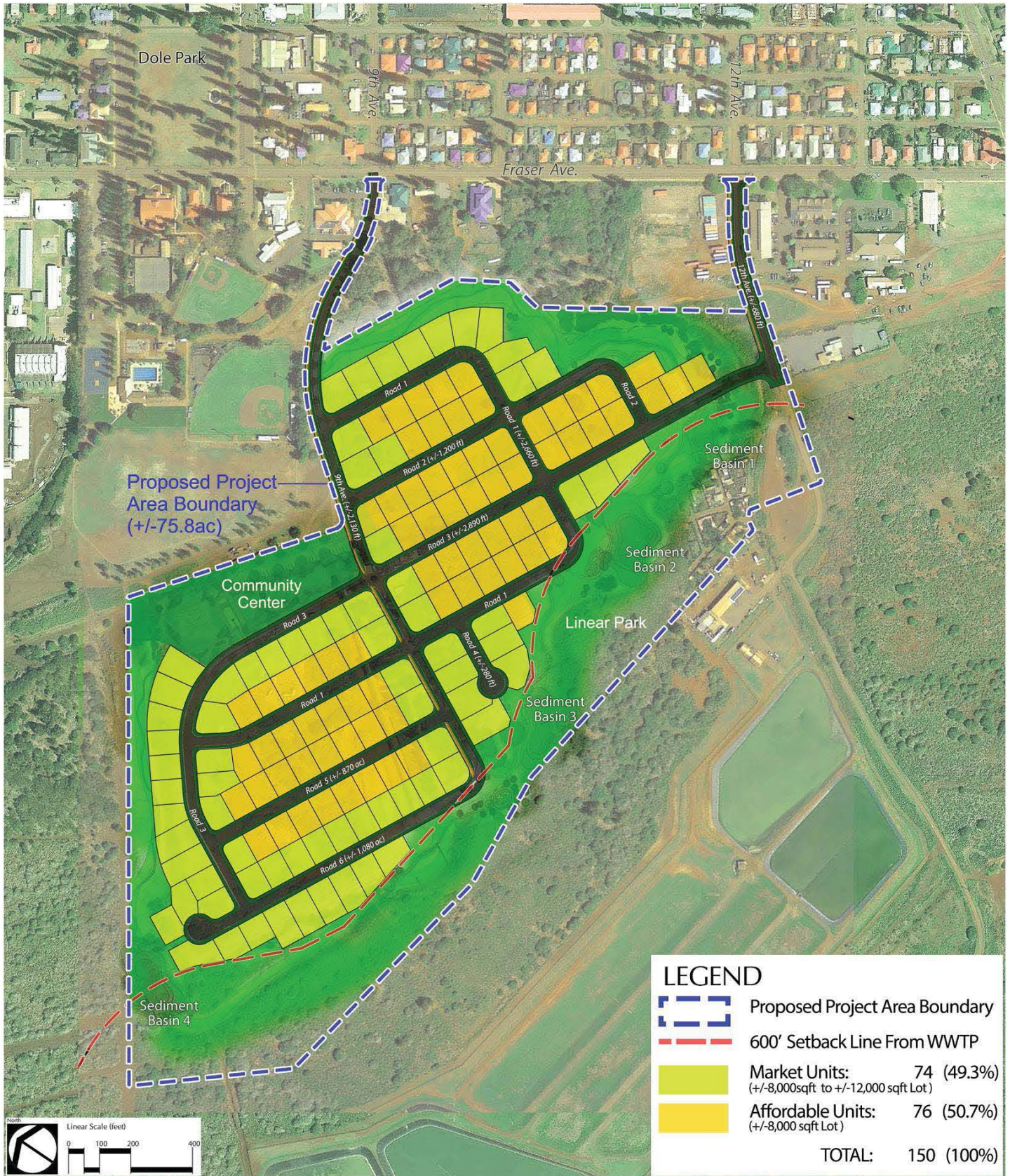
Residential Use:

- Minimum lot area 8,000 square feet
Height: No building shall exceed two-stories or 30 feet in height, measured from finished grade
- Setback: Five (5) feet front yard
Six (6) feet side and rear yard; except one zero lot line may be permitted on an adjacent property boundary.
- Reduction of front yard setback will allow greater separation between opposing houses, increasing the back yard space for enhanced usability.

Park Use:

- Minimum lot area: One (1) acre
Height: No building shall exceed two-stories or forty-five (45) feet in height, measured from finished grade
- Setback: Ten (10) feet front yard
Ten (10) feet side and rear yard

- b. An exemption from Sections 19.02A.030 Interim District, 19.07.030 Open Space District, and 19.30A, Agriculture District, MCC, Permitted Uses, shall be granted to allow the following principal uses: 1) single-family units; and 2) accessory structures such as carports and private garages; parking areas; energy systems, small-scale; fences and walls; storage sheds; and



Hokuao Homes 201H Housing
 Conceptual Lot Plan
 10/16/2020



EXHIBIT "B"

park recreational buildings and structures, including, but not limited to gazebo, pavilions, courts, and pools.

- c. Uses permitted in Chapter 19.08 Residential District, 19.09 R-0 Zero Lot Line Residential District, and 19.12 Apartment District would be permitted in the areas noted for residential use in **Exhibit “B”** and 19.27A.030 Park Districts, except GC Golf Course District, shall be permitted for the portion of the project area noted for Park use in **Exhibit “B”**; including the following additional uses:
 - Utility facilities, minor; and
 - Utility services
- d. An exemption from Section 19.30A.040, MCC, Limitations on Resubdivision, shall be granted to allow for the residential, infrastructure, and public facility use on lots to be created relative to lands included in County of Maui Subdivision File No. 6.180.

G. HAWAI‘I COASTAL ZONE MANAGEMENT PROGRAM

The Coastal Zone Management Area as defined in Chapter 205A, HRS, includes all the lands of the State. As such, the proposed activities lie within the Coastal Zone Management Area.

The relevant objectives and policies of the Hawai‘i Coastal Zone Management (CZM) Program along with a detailed discussion of how the proposed actions do not conflict with these objectives and policies, is discussed below.

Land uses are required to comply with the provisions and guidelines contained in Chapter 205A, Hawai‘i Revised Statutes (HRS), entitled “Coastal Zone Management,” as described below:

- 1) ***Recreational resources:*** *Provide coastal recreational opportunities accessible to the public.*
 - A) *Improve coordination and funding of coastal recreational planning and management; and*
 - B) *Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:*
 - i) *Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;*
 - ii) *Requiring restoration of coastal resources that have significant recreational and ecosystem value, including but not limited to*

coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes, when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable;

- iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;*
- iv) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;*
- v) Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;*
- vi) Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;*
- vii) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and*
- viii) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting that dedication against the requirements of section 46-6;*

Response:

Pūlama Lānaʻi is proposing an approximate 150-unit residential development of Hōkūao at Lānaʻi City. Most of the project area topography consists of flat to gently sloping open, patchy forest and scrub lands.

The project also includes a one-acre park, a 1,500-square foot community center, comfort stations, and 60-parking stalls. Ninth and Twelfth Streets, both of which are currently dirt roads, will be improved as part of this project.

The proposed project will not impact coastal recreational resources, nor will it affect public shoreline access and activities.

2) Historic resources:

- A) *Identify and analyze significant archaeological resources;*
- B) *Maximize information retention through preservation of remains and artifacts or salvage operations; and*
- C) *Support state goals for protection, restoration, interpretation, and display of historic resources;*

Response:

Archaeological investigations were conducted and an Archaeological Monitoring Plan (AMP) was submitted to the State Historic Preservation Division (SHPD) for review and approval in November 2020, however, due to the new SHPD Hawai'i Cultural Resource Information System (HICRIS) intake system, the AMP was not uploaded into the online system until March 2021. Refer to **Appendix "D-2"**. The Applicant will comply with the approved monitoring plan. In conjunction with any ground-altering work, a qualified monitor will be present to monitor all subsurface construction activities.

3) Scenic and Open space resources:

- A) *Identify valued scenic resources in the coastal zone management area;*
- B) *Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;*
- C) *Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and*
- D) *Encourage those developments that are not coastal dependent to locate in inland areas;*

Response:

The project site is not part of a scenic corridor and the project will not affect scenic vistas and view planes. The proposed project will not involve significant alteration of the existing topographic character of the site and will not affect public views to and along the shoreline.

Most of the project area topography consists of flat to gently sloping open, weedy and scrub lands.

Hökūāo 201H Housing Project at Lānaʻi City is essentially an extension of similar kinds of uses and activities of the adjoining Lānaʻi City.

With most of the plantation structures laid out and built within a short time frame as part of a company housing provision, a discernable character for Lānaʻi City was established. These include: rectilinear street patterns; small lot size, lots enlarging as one moves away from Dole Park; and small/uniform residential homes scale. A similarly concentrated commercial core replicates the scale and character of nearby residences.

This gives the city a cohesive, balanced appearance throughout the community. Hōkūao will reiterate these in the new development and are in keeping with the proposed Lānaʻi City Country Town Business District Design guidelines approved in 2020.

While the visual character of the project area will be modified by the proposed project, it will not have an adverse effect upon scenic resources or view corridors.

4) Coastal ecosystems:

- A) *Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;*
- B) *Improve the technical basis for natural resource management;*
- C) *Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;*
- D) *Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and*
- E) *Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures;*

Response:

There are no rare, threatened or endangered plants or animal species on the project site nor is there critical habitat. As such, no adverse impacts are anticipated on significant habitats.

The proposed project is not expected to have an adverse effect upon the region's coastal ecosystem. Appropriate Best Management Practices (BMPs) and erosion control measures will be implemented to minimize the effects of stormwater runoff during implementation of the project and to ensure that coastal ecosystems are not adversely impacted by construction activities.

5) Economic uses:

- A) *Concentrate coastal dependent development in appropriate areas;*
- B) *Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area; and*
- C) *Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when:*
 - i) *Use of designated locations is not feasible;*
 - ii) *Adverse environmental effects and risks from coastal hazards are minimized; and*
 - iii) *The development is important to the State's economy;*

Response:

The project site and the lands in the vicinity of the project site are either existing or planned for future urban related development.

Hökūāo 201H Housing Project at Lānaʻi City is essentially an extension of similar kinds of uses and activities of the adjoining Lānaʻi City.

With most of the plantation structures laid out and built within a short time frame as part of a company housing provision, a discernable character for Lānaʻi City was established. These include: rectilinear street patterns; small lot size, lots enlarging as one moves away from Dole Park; and small/uniform residential homes scale. A similarly concentrated commercial core replicates the scale and character of nearby residences.

This gives the city a cohesive, balanced appearance throughout the community. Hökūāo will reiterate these in the new development and are in keeping with the proposed Lānaʻi City Country Town Business District Design guidelines approved in 2018.

While the visual character of the project area will be modified by the proposed project, it will not have an adverse effect upon scenic resources or view corridors.

The intent is to develop affordable housing within walking distance to the core services and facilities of Lānaʻi City.

The County establishes its affordability threshold for projects as those projects that primarily are affordable to households with incomes at or below 140% of area median income.

Section 201H-38, HRS, provides a process whereby an affordable housing project may be granted exemptions from any statutes, ordinances and rules of any governmental agency relating to planning, zoning and construction standards that do not negatively affect the health and safety of the general public.

Particular exemptions requested through the 201H process are generally processed through the appropriate county agencies.

Affordable housing projects are eligible if at least fifty-one percent (51%) of the units are made affordable to income target groups established by City rules, based on guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

The target groups are defined as a percentage (usually 60-140 percent) of the median income as determined by HUD. Projects must contain at least 50 dwelling units. Projects which are developed only for persons with special living needs are not subject to this requirement.

6) Coastal hazards:

- A) *Develop and communicate adequate information about the risks of coastal hazards;*
- B) *Control development, including planning and zoning control, in areas subject to coastal hazards;*
- C) *Ensure that developments comply with requirements of the National Flood Insurance Program; and*
- D) *Prevent coastal flooding from inland projects;*

Response:

The project site is located in Zone "X", an area of minimal flooding and does not lie in an area which is subject to tsunami evacuation.

7) Managing development:

- A) *Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;*
- B) *Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and*
- C) *Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process;*

Response:

The proposed use is similar to the surrounding uses and the broader Lānaʻi City community.

Pūlama Lānaʻi is committed to strict compliance with State laws and rules. The subject property and the lands in the vicinity of the project site are either planned or designated for urban and related development.

The intent is to develop affordable housing within walking distance to the core services and facilities of Lānaʻi City.

The County establishes its affordability threshold for projects as those projects that primarily are affordable to households with incomes at or below 140% of area median income.

Section 201H-38, HRS, provides a process whereby an affordable housing project may be granted exemptions from any statutes, ordinances and rules of any governmental agency relating to planning, zoning and construction standards that do not negatively affect the health and safety of the general public.

Particular exemptions requested through the 201H process are generally processed through the appropriate county agencies.

Affordable housing projects are eligible if at least fifty-one percent (51%) of the units are made affordable to income target groups established by City rules, based on guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

The target groups are defined as a percentage (usually 60-140 percent) of the median income for Maui County as determined by HUD. Projects which are developed only for persons with special living needs are not subject to this requirement.

8) *Public participation:*

- A) *Promote public involvement in coastal zone management processes;*
- B) *Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and*
- C) *Organize workshops, policy dialogues, and sitespecific mediations to respond to coastal issues and conflicts;*

Response:

As part of the early consultation process for the preparation of the Draft EA, letters describing the proposed project and requesting comments on the project were sent to various government agencies and others.

Public community meetings were held on Lānaʻi on August 8, 2016 (approximately 102 participants) November 12, 2018 (approximately 65-people attended) and most recently on February 22, 2021. Additionally, the Lānaʻi Planning Commission reviewed and commented on the Draft EA for the project at its regular meeting on January 20, 2021, which was open to the public. The project was explained, and questions were asked and answered. Refer to **Appendix “K”**.

Opportunities for public awareness, education, and participation in coastal management are provided through these entitlement processes, as well as through the environmental assessment process.

This environmental assessment and the subsequent permitting processes are part of the opportunity for ongoing public participation.

9) Beach protection:

- A) *Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;*
- B) *Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;*
- C) *Minimize the construction of public shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;*
- D) *Minimize grading of and damage to coastal dunes;*
- E) *Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner’s vegetation in a beach transit corridor; and*
- F) *Prohibit private property owners from creating a public nuisance by allowing the private property owner’s unmaintained vegetation to interfere or encroach upon a beach transit corridor; and*

Response:

Hökūao 201H Housing Project area lies between 1,500 and 1,600 ft. above sea level at Lānaʻi City, miles from any shoreline. As such, no adverse impacts to public beach use and recreation are expected to occur.


10) Marine and coastal resources:

- G) *Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;*
- H) *Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;*
- I) *Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;*
- J) *Promote research, study, and understanding of ocean and coastal processes, impacts of climate change and sea level rise, marine life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources; and*
- K) *Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.*

Response:

The proposed project does not involve the direct use or development of marine resources. By incorporating site-specific erosion and sedimentation control measures during and after construction, adverse impacts to near shore waters from runoff and pollution are not expected.

From this perspective, the proposed project is not expected to have a significant impact on coastal or marine resources.



UNAVOIDABLE ADVERSE
ENVIRONMENTAL EFFECTS
AND IRREVERSIBLE AND
IRRETRIEVABLE
COMMITMENTS OF
RESOURCES

IV

IV. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

In the short term, the proposed project will result in unavoidable construction-related impacts, including air quality impacts during construction and noise impacts generated by construction equipment and activities. Air quality impacts will be mitigated by following Best Management Practices (BMPs) during construction to minimize air quality impacts to surrounding properties such as dust screens around active construction areas, and regular sprinkling of water to reduce dust. In addition, there may be temporary noise impacts associated with construction equipment and vehicles. These noise and air quality impacts will be temporary in nature, occurring only during the construction period, and will be mitigated to the extent practicable through implementation of BMPs.

Residential development of Hōkūāo 201H Housing at Lānaʻi City will require minor commitments of both renewable and nonrenewable energy and material resources. Nonrenewable resources that will be used during the project include fuel, water, and other resources necessary for the proposed activities.

Resources that are irreversibly or irretrievably committed to a project are those that are typically used on a long-term or permanent basis; however, those used on a short-term basis that cannot be recovered (e.g., non-renewable resources) also are irretrievable. All uses in the proposed project will conform to applicable County, State and Federal laws, codes, ordinances, rules, and regulations.

The proposed project is intended to have a positive effect on the delivery of 76 perpetually affordable workforce housing rental units in Maui County to those residents earning 140 percent or less of the Area Median Income.



ALTERNATIVES TO THE
PROPOSED ACTION



V. ALTERNATIVES TO THE PROPOSED ACTION

Alternatives to the “preferred alternative”, which is the proposed action, include the “no action alternative”, “existing zoning alternative”, and “design alternatives”. These alternatives are discussed below.

A. PREFERRED ALTERNATIVE

The preferred alternative, is to proceed with the proposed project with exemptions as allowed under the 201H program. Generally described, the project would include:

- 150-single-family homes
 - 76-affordable homes for rent (rates according to 201H guidelines)
 - 74-market-rate homes for rent
- Lot sizes will generally be approximately 8,000-square feet (s.f.)
- House sizes are anticipated to be:
 - 2-bedroom (150 homes) units will be approximately 1,150-1,175 s.f. interior, 370-375 s.f. lanai and may include a carpark pad or carport (subject to change based on final construction design)
- All homes (affordable and market) will:
 - Reflect the existing design vernacular of Lāna‘i City
 - Hipped roofs, gracious lanais, board and batten siding, large trim profiles, and other design details matching Lāna‘i City building characteristics

Along the east edge bordering the school fields, the project provides a 1-acre park, a 1,500-square foot community center for use by the Lāna‘i community, and 60 parking stalls for intermittent parking (e.g., community events at the community center, guests visiting residents of the Hōkūao residential units, etc.).

B. NO ACTION ALTERNATIVE

Under the “no action” alternative, the project site would remain “as is”. The “no action” alternative is not considered to be in the best interest of Lāna‘i residents as the “no action” alternative would not provide new workforce housing opportunities. In this context, the proposed project is considered the most appropriate alternative.

C. EXISTING ZONING ALTERNATIVE

Under the existing zoning alternative, only uses permitted under the County’s “Open Space”, “Active Open Space”, “Agriculture”, “Road”, and “Interim” zoning are considered.

In addition to “Open Space”, “Active Open Space”, and “Agriculture”, permitted uses under existing zoning allow uses on a portion of the project site that include:

One single-family dwelling per six thousand square feet of land; Duplex dwellings (with minimum land areas of 12,000 square feet;) Hospitals and/or sanitariums, and/or convalescent homes, day care facilities, museums, churches, libraries, kindergartens, elementary schools, intermediate schools, high schools, universities, publicly owned buildings, public utility uses, and tower structures in support of a utility;

The construction of new, or the expansion of existing parks, playgrounds, community centers or public/quasi-public facilities, owned or operated by private or governmental agencies, and tower structures in support of a utility; provided that the utility services the new or expanded park, playground, community center or public/quasi-public facility; Agricultural uses; and Bed and breakfast homes and Short-term rental homes (subject to additional provisions.)

While the ‘Interim’ designation allows for the development of homes, the Open Space and Agriculture uses do not. Further, it is noted that only a portion of the project site is zoned “Interim” and, as such, the number of homes that could be constructed would be less than what is proposed. The intent is to develop workforce housing within walking distance to the core services and facilities of Lāna‘i City.

Because the existing zoning alternative does not meet Pūlama Lāna‘i’s objectives, this alternative has been rejected.

D. DESIGN ALTERNATIVES

The project’s Draft EA contemplated a project layout which included a development program consisting of 135 2-bedroom homes and 15 4-bedroom homes. All of the 76 affordable units were proposed as 2-bedroom homes. The 4-bedroom homes were proposed as part of the 74 market rate unit count. As previously noted, due to increasing construction costs, the Applicant is not considering any 4-bedroom homes at this time and has instead proposed that all 150 units for the Hokuao project will be 2-bedroom units. The 76 affordable homes will be rented, in perpetuity, to households with incomes at or below 140 percent of the AMI (as adjusted for Lāna‘i). There are additional permits and approvals that the project will need to receive in order to proceed.

Adjustment of the unit size mix does not represent a material change in the proposed action. The analysis of impacts and mitigation measures associated with a development consisting of 150 2-bedroom units and a development consisting of 135 2-bedroom and 15 4-bedroom units is substantially the same, though it is recognized that a unit mix consisting entirely of 2-bedroom homes may have associated water and wastewater usage that is slightly lower than a unit mix that includes 15 4-bedroom units. Any difference in impacts and mitigation measures, however, would be negligible.

It is noted that the project's technical studies considered the impacts for a limited amount of the larger 4-bedroom homes, as well as a greater number of total units (200 homes) than planned (150 homes).



SIGNIFICANCE CRITERIA
ASSESSMENT

VI



VI. SIGNIFICANCE CRITERIA ASSESSMENT

The proposed project involves the development of 150 single-family homes, with 76 homes exclusively for rent to households falling within the HUD low-income guidelines, adjusted for Lānaʻi by the County of Maui Department of Housing and Human Concerns, and 74 homes to be rented at market rates. The project also includes a 1-acre park, a 1,500 square foot community center for use by the Lānaʻi community, and 60 parking stalls for intermittent parking (e.g., community events at the community center, guests visiting residents of the Hōkūao residential units, etc.).

Pursuant to Chapter 343, Hawaiʻi Revised Statutes (HRS), and Chapter 200.1 (Title 11), Environmental Impact Statement Rules, Hawaiʻi Administrative Rules (HAR), the proposed action, its expected primary and secondary consequences, and the cumulative as well as the short-term and long-term effects of the action have been evaluated in accordance with the Significance Criteria of Section 11-200.1-13 of the Administrative Rules. Discussion of project conformance to the Significance Criteria is as follows:

1. **Irrevocably commit a natural, cultural, or historic resource.**

There are no known rare, threatened, or endangered species of flora, fauna, avifauna, or important habitats located within the project site. As noted earlier, an Archaeological Inventory Survey (AIS) and Terrestrial Vegetation and Wildlife Surveys have been carried out on the project site.

An Archaeological Monitoring Plan associated with ground disturbing subsurface activities for the proposed project has been prepared in accordance with the rules of the State Historic Preservation Division (SHPD) to ensure that if human skeletal remains are identified during subsurface work, that the protocol concerning the inadvertent discovery of human remains pursuant to the HAR is followed. The Archaeological Monitoring Plan will be reviewed and accepted by the SHPD and will be implemented during construction to identify, document, and record any historic properties inadvertently identified, and to provide appropriate mitigation methods, as necessary. Refer to **Appendix “D-2”**.

The proposed project is not anticipated to involve an irrevocable commitment to loss or destruction of any natural or cultural resource.

2. **Curtail the range of beneficial uses of the environment**

The vegetation within the project area is dominated by non-native weedy species, including sourgrass and golden crown-beard, as well as non-native trees such as Christmas berry, Formosa koa, and koa haole.

There are no significant adverse impacts to climate, topography, or soils anticipated to result from the proposed project. There are also no known rare, threatened, or endangered species of flora, fauna, or avifauna located within the project site. Refer to **Appendix “C”**.

The proposed project will be implemented adjacent to existing residential developments, and the commitment of land resources for the proposed action will not curtail the range of beneficial uses of the environment. On the island of Lānaʻi, there are over 13,000 acres of available agricultural lands. The proposed project includes the use of 76 acres, or approximately 0.38 percent of the available agricultural lands on Lānaʻi, and an even lesser fraction of approximately 0.25 percent, or up to 20,000 potentially cultivatable acres of land. The proposed use of the site for development of affordable housing is compatible with adjacent residential uses and will not curtail the beneficial use of the project area.

3. Conflict with the State’s environmental policies or long-term environmental goals established by law.

The proposed project involves the development of 150 single-family homes and related improvements. An Environmental Assessment was prepared for the project to ensure the proposed action does not have adverse environmental impacts. As such, the proposed project does not conflict with the State’s Environmental Policy and Guidelines as set forth in Chapter 344, HRS.

Section 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 Hawai’i.*

4. Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community or State.

The proposed project will directly benefit low income families that are earning 140 percent or less of the AMI by providing affordable housing for this target group. In addition, the proposed project will have a positive impact on the local economy by providing construction and construction-related employment. Therefore, the proposed project will have a positive short-term effect on economic and social welfare. From a long-term perspective, the proposed project will ensure affordable housing and will be available for residents earning 140 percent or less of the AMI in perpetuity.

The cultural impact assessment did not identify any ongoing traditional or cultural practices occurring within the project site.

No substantial adverse long-term economic or social welfare impacts to the community, County or State are anticipated.

5. **Have a substantial adverse effect on public health.**

The project is not anticipated to result in long-term air or noise impacts. Furthermore, the proposed action is not anticipated to create significant direct or indirect foreseeable greenhouse gas (GHG) emissions, and does not fall within the threshold of mandatory GHG reporting. As such, no adverse impact to public health or welfare is anticipated as a result of the proposed action.

During the construction period, appropriate BMPs will be implemented to mitigate potential air quality and noise impacts. Following construction, long-term adverse public health impacts resulting from the proposed project are not anticipated.

6. **Involve adverse secondary impacts, such as population changes or effects on public facilities.**

The proposed project will provide needed additional affordable housing units for Lānaʻi residents. It is anticipated that many of the future residents of Hōkūāo will be existing Lānaʻi residents who will move to the Hōkūāo project as an opportunity to provide a larger living area for their families. As such, the project is not anticipated to involve substantial secondary impacts due to population change. Secondary impacts on public facilities are not anticipated. The Applicant will provide the necessary onsite and offsite infrastructure to support the proposed project. No substantial changes or effects on public facilities are expected with project implementation.

As such, the project is not anticipated to result in significant adverse secondary impacts. The proposed infrastructure improvements are not anticipated to significantly adversely impact public facilities or services.

7. **Involve a substantial degradation of environmental quality.**

No substantial degradation of environmental quality resulting from the action is anticipated. Best Management Practices (BMPs) and appropriate erosion control measures will be utilized during the construction period. Drainage system improvements will be constructed in accordance with applicable regulatory design standards to ensure that surface runoff will not have an adverse effect on adjacent or downstream properties. Any potential short-term impacts to air and noise quality during the construction phase of the project will be mitigated through employing BMPs. In the long term, the project will not adversely impact air quality and ambient noise.

As previously discussed in Chapter II of this EA document, significant adverse impacts to natural resources, cultural resources, and the natural environment are not anticipated.

8. Be individually limited but cumulatively has substantial adverse effect upon the environment or involves a commitment for larger actions.

The proposed Hōkūāo 201H Housing Project and related improvements are not anticipated to cumulatively have a significant negative impact on the physical environment and does not represent a commitment for larger action. See **Chapter II, Section E**.

9. Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat.

Rare, threatened or endangered species of flora, fauna, avifauna or their habitats are not expected to be adversely affected by the proposed project as none were identified in the biological resources survey conducted for the project. Refer to **Appendix “C”**.

10. Have a substantial adverse effect on air or water quality or ambient noise levels.

Construction activities will result in short-term air quality and noise impacts. BMPs for dust control measures, such as temporary diversion channels and retention basin, regular watering and sprinkling, and erection of dust screens will be implemented to minimize construction-related air quality impacts, as warranted. Equipment mufflers or other noise attenuating equipment, as well as proper equipment and vehicle maintenance and other BMPs are anticipated to mitigate noise from construction activities. Erosion control measures implemented during construction will reduce the amount of silt and stormwater runoff flowing downstream. Refer to **Appendix “I”**.

Based on the discussion provided above, the proposed project is not anticipated to significantly detrimentally affect air or water quality or ambient noise levels.

11. Have a substantial adverse effect on or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

The project site is situated inland and is not anticipated to have any adverse impact upon coastal waters or resources, beaches, estuaries, or other fresh water bodies.

According to the Federal Emergency Management Agency’s Flood Insurance Rate Maps currently in effect, the project site falls within Zone X (unshaded), an area of minimal flooding. The project site is located outside of the tsunami inundation zone. In addition, the project site is located outside of the 3.2-foot projected sea level rise exposure area.

12. **Have a substantial adverse effect on scenic vistas and viewplanes, during day or night, identified in county or state plans or studies.**

The proposed project is low-profile, with a maximum building height of one story and is not located within a scenic view corridor. As such, the proposed project is not anticipated to adversely affect scenic view corridors.

13. **Require substantial energy consumption or emit substantial greenhouse gases.**

The proposed action will involve the short-term commitment of fuel for equipment, vehicles, and machinery during construction activities. However, this use is not anticipated to result in a substantial consumption of energy resources or substantial emission of greenhouse gases. In the long term, the project will create an additional demand for electricity. However, Pūlama Lāna'i is also evaluating the option to install photovoltaic and battery solutions for each residential unit that will be designed to provide most of the energy demand for each residential unit. This will significantly reduce the nonrenewable fuel resources for the project (e.g., oil for HECO's power plant), therefore decreasing the total carbon footprint for the project and overall greenhouse gas emissions.

Based on the aforementioned findings, the Department of Housing and Human Concerns has determined that the proposed project will result in Finding of No Significant Impact (FONSI).



LIST OF PERMITS
AND APPROVALS

VII



VII. LIST OF PERMITS AND APPROVALS


The following permits and approvals will be required prior to the implementation of the project:

State of Hawai'i

1. Chapter 343 Hawai'i Revised Statutes, Environmental Assessment
2. National Pollutant Discharge Elimination System (NPDES), as applicable
3. Community Noise Permit, as applicable
4. Hawai'i Revised Statutes, Section 201H-38 State Land Use District Boundary Amendment Approval (Land Use Commission)

County of Maui

1. Hawai'i Revised Statutes, Section 201H-38 Affordable Housing Approval
2. Construction Permits (Grading, Building, Electrical, and Plumbing)
3. Subdivision process



PARTIES CONSULTED
DURING THE
PREPARATION OF THE
DRAFT ENVIRONMENTAL
ASSESSMENT; LETTERS
RECEIVED AND
RESPONSES TO
SUBSTANTIVE
COMMENTS

VIII



VIII. PARTIES CONSULTED DURING THE PREPARATION OF THE DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED AND RESPONSES TO SUBSTANTIVE COMMENTS

The following agencies were consulted during the early consultation in preparation of the Draft Environmental Assessment (EA). Agency comments and responses to substantive comments are included herein.

Federal Agencies

1. U. S. Fish and Wildlife Service
300 Ala Moana Blvd., Rm. 3-122
Honolulu, HI 96850

8. Legislative Reference Bureau Library
State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

State Agencies

2. State of Hawai'i
Department of Health
Office of Environmental Quality Control
235 S. Beretania Street, Suite 702
Honolulu, HI 96813

9. State Library Office
415 S. Beretania Street, Room 005
Honolulu, HI 96813

3. State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813

Maui County Agencies

10. County of Maui
Department of Environmental Management
2050 Main Street, Suite 2B
Wailuku, HI 96793

4. State of Hawai'i
Office of Hawaiian Affairs
560 N. Nimitz Highway, Suite 200
Honolulu, HI 96817

11. County of Maui
Department of Fire and Public Safety
200 Dairy Road
Kahului, HI 96732

5. State of Hawai'i
Department of Health
Environmental Health Administration
P.O. Box 3378
Honolulu, HI 96801

12. County of Maui
Department of Housing and Human
Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

6. State of Hawai'i
Department of Business, Economic
Development & Tourism
Office of Planning
235 S. Beretania Street, 6th Floor
Honolulu, HI 96813

13. County of Maui
Department of Parks and Recreation
700 Halia Nakoia Street, Unit 2F
Wailuku, HI 96793

7. State of Hawai'i
Department of Land and Natural Resources
P. O. Box 621
Honolulu, HI 96809

14. County of Maui
Maui Police Department
55 Mahalani Street
Wailuku, HI 96793

15. County of Maui
Department of Planning
2200 Main Street, Suite 315
Wailuku, HI 96793
16. County of Maui
Department of Public Works
200 South High Street
Wailuku, HI 96793
17. County of Maui
Department of Transportation
David Trask Building, Suite 102
2145 Kaohu Street
Wailuku, HI 96793
18. County of Maui
Department of Water Supply
200 South High Street, 5th Floor
Wailuku, HI 96793



DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

JAN SHEESHOO
Deputy Director

200 SOUTH HIGH STREET • WAILUKU, HAWAII 96793 • PHONE (808) 270-7805 • FAX 270-7165 • EMAIL director.hhc@mauicounty.gov

December 28, 2018

Mr. Peter T. Young
President
Ho'okuleana LLC
1539 Kanapun'u Drive
Kailua, Hawaii 96734

Dear Mr. Young:

SUBJECT: PRE-ASSESSMENT CONSULTATION AND SCOPING FOR DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED HOKU-AO 201H HOUSING PROJECT AT TMK: (2) 4-9-002:061 POR., TMK: (2) 4-9-014:001 POR., TMK: (2) 4-9-014:009 POR., AND 4-9-014:011 POR. LANAI CITY, LANAI, HAWAII

The Department has reviewed the proposed Draft Environmental Request for the above subject project. Based on our review, we have determined that the project is subject to Chapter 2.96, Maui County Code, and must comply with all applicable regulations.

Please contact Mr. Buddy Almeida, Housing Administrator, at (808) 270-7355 if you have any questions.

Sincerely,

WILLIAM R. SPENCE
Director of Housing and Human Concerns

xc: Buddy Almeida, Housing Administrator

TO SUPPORT AND EMPOWER OUR COMMUNITY TO REACH ITS FULLEST POTENTIAL
FOR PERSONAL WELL-BEING AND SELF-RELIANCE

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Department of Housing and Human Concerns
County of Maui
200 South High Street
Wailuku, Hawaii 06793

April 15, 2019

Sent only via e-mail to director.hhc@mauicounty.gov

Re: Hōkūao 201H Housing Project - Draft Environmental Assessment

Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above reference project.

We acknowledge your comment that the project is determined to be subject to Chapter 2.96, Maui County Code.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC

Peter T Young
President

Do well by doing good.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

JAN 29 2019

19315
SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER
AGRICULTURE
BOATING AND RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Peter T. Young
1539 Kanapu'u Drive
Kailua, HI 96734

Dear Mr. Young:

The Department of Land and Natural Resources Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding the Draft Environmental Assessment for the proposed Hōkū-ao 201H Housing Project in Lāna'i City, Lāna'i, TMKs: (2) 4-9-002:061 por., (2) 4-9-014:001 por., (2) 4-9-014:009 por., and (2) 4-9-014:011 por. The proposed project would include construction of 200 single-family homes, a one-acre park, a 1,500 square foot community center, comfort stations, and 100 parking stalls over approximately 50 acres of flat and gently sloping open scrub lands.

The State and Federal listed Hawaiian Hoary Bat (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of the project area and may roost in trees. To avoid the potential for impacts to this tree-roosting species, site clearing should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). If this cannot be avoided woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW. Barbed wire should be avoided for any construction because bat mortalities have been documented as a result of becoming ensnared by barbed wire during flight.

We note that artificial lighting can adversely impact seabirds that may pass through the area at night causing disorientation that could result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required at the facility, DOFAW recommends that any lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea.

The State and Federal listed Blackburn's Sphinx Moth (BSM; *Manduca blackburni*) has a historic range that encompasses the project area. Larvae of BSM feed on many nonnative hostplants that include tree tobacco (*Nicotiana glauca*) which grows in disturbed soil. We recommend contacting our Maui DOFAW office at (808) 984-8100 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM.

DOFAW recommends surveying for rare and endangered plants that historically occur in the area. If any of these species are found, please notify our Maui DOFAW office at (808) 984-8100.

We recommend using native plant species for landscaping that are appropriate for the area (i.e. climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (<https://sites.google.com/site/weedriskassessment/home>).

You should avoid moving soil or other plant material within the island due to the potential presence of pathogens. We recommend consulting the Hawai'i Interagency Biosecurity Plan at <http://dlnr.hawaii.gov/hisc/plans/hibp/> in planning, design, and construction of the project.

DOFAW is concerned about attracting vulnerable birds to areas that may host non-native predators such as cats, rodents, and mongoose. Additionally, the construction of a community park and an associated increase in park users may generate more trash. We recommend taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Jim Cogswell, Wildlife Program Manager at (808) 587-4187 or James.M.Cogswell@hawaii.gov.

Sincerely,

DAVID G. SMITH
Administrator

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, Hawaii 96813

April 15, 2019

Sent only via e-mail to James.M.Cogswell@hawaii.gov

Re: Hōkūao 201H Housing Project - Draft Environmental Assessment

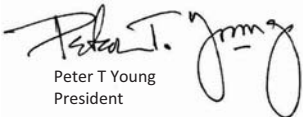
Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above reference project.

We acknowledge your comments that the Hawaiian Hoary Bat has the potential to occur in the vicinity of the project area and may roost in trees, your concern for artificial lighting, Blackburn's Sphinx Moth range and your recommendation to survey for rare and endangered plants that historically occur in the area.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC



Peter T Young
President



DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

December 14, 2018

Ho'okuleana LLC
Attention: Mr. Peter Young
1539 Kanapu'u Drive
Kailua, Hawaii 96734

via email: PeterYoung@Hookuleana.com

Dear Mr. Young:

SUBJECT: Pre-Assessment Consultation and Scoping for Draft Environmental Assessment for the Proposed **Hoku-ao 201H Housing Project** located on the Island of Lanai; TMK: (2) 4-9-002:061 and (2) 4-9-014:001, 009, and 011 on behalf of Lanai Resorts, LLC

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division, (b) Commission on Water Resource Management, (c) Office of Conservation & Coastal Lands, and (d) Land Division – Maui District on the subject matter. Should you have any questions, please feel free to call Darlene Nakamura at (808) 587-0417. Thank you.

Sincerely,



Russell Y. Tsuji
Land Administrator

Enclosures
cc: Central Files

Do well by doing good.

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji

Ref: Pre-Assessment Consultation and Scoping for Draft Environmental Assessment for the Proposed Hoku-ao 201H Housing Project, Island of Lanai; TMK: (2) 4-9-002:061 and (2) 4-9-014:001, 009, and 011

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiifip.org/FHAT>).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- o Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- o Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- o Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4846.

Signed: 
CARTY S. CHANG, CHIEF ENGINEER

Date: 12/11/16

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Hawaii Department of Land and Natural Resources
Engineering Division
P. O. BOX 621
Honolulu, HI 96809

April 15, 2019

Sent only via e-mail to carty.s.chang@hawaii.gov

Re: Hōkūāo 201H Housing Project - Draft Environmental Assessment

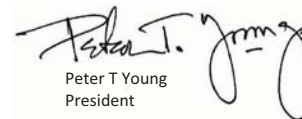
Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above referenced project.

We acknowledge your comments concerning the National Flood Insurance Program. Issues related to flood zones will be incorporated in to the EA.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC


Peter T Young
President

Do well by doing good.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

December 3, 2018

REF: RFD.4985.5

SUZANNE D. CASE
CHAIRPERSON

BRUCE S. ANDERSON, PH.D.
WILLIAM D. BALFOUR, JR.
KAMANA BEAMER, PH.D.
MICHAEL G. BUCK
NEIL J. HANNAHS
PAUL J. MEYER

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR

Mr. Russell Tsuji
Page 2
December 3, 2018

TO: Mr. Russell Tsuji, Administrator
Land Division

FROM: Jeffrey T. Pearson, P.E., Deputy Director *[Signature]*
Commission on Water Resource Management

SUBJECT: Pre-Assessment Consultation and Scoping for Draft Environmental Assessment for the Proposed Hoku-ao 201H Housing Project

FILE NO.: RFD.4985.5
TMK NO.: (2) 4-9-002:061 and (2) 4-9-014:001, 009, and 011

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrm>.

Our comments related to water resources are checked off below.

- 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/lw-impact-development/>
- 6. We recommend the use of alternative water sources, wherever practicable.
- 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at

- 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- 11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
- 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- 14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- OTHER: The Draft Environmental Assessment should discuss the projected water demands for the project, both potable and non-potable, and provide the calculations used to estimate demands. The Draft Environmental Assessment should identify the proposed water source(s) to support the project, and include a discussion of the potential impacts on water resources and other public trust uses of water, and describe any proposed mitigation measures. Water conservation and efficiency measures to be implemented should be discussed. The consistency of this project with the Lanai Water Use and Development Plan (2011) should also be discussed.

If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Hawaii Department of Land and Natural Resources
Commission on Water Resource Management
P. O. BOX 621
Honolulu, HI 96809

April 15, 2019

Sent only via e-mail to Lenore.N.Ohve@hawaii.gov

Re: Hōkūāo 201H Housing Project - Draft Environmental Assessment

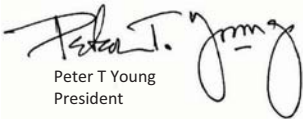
Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above referenced project.

We acknowledge your comments concerning the projected water demands for the project. These will be incorporated into the EA.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC



Peter T Young
President

Do well by doing good.




Doc Reviews (5) RFD.4981.8 Pacific Spaceport; RFD.4983.3 Ala Wai Canal Bridge Alternatives Analysis; RFD.4984.5 Pulama Lanai Miki Basin 200-Acre Industrial Area; RFD.4211.8 Six-Lot Residential Agricultural Subdivision; RFD.4985.5 Hoku-ao 201H Housing Proj

Adobe Sign Document History

12/03/2018

Created:	12/03/2018
By:	Kathy Yoda (kathy.s.yoda@hawaii.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAawX4bNg3niLiGD4my2xLdYY6POjppDd7d

"Doc Reviews (5) RFD.4981.8 Pacific Spaceport; RFD.4983.3 Ala Wai Canal Bridge Alternatives Analysis; RFD.4984.5 Pulama Lanai Miki Basin 200-Acre Industrial Area; RFD.4211.8 Six-Lot Residential Agricultural Subdivision; RFD.4985.5 Hoku-ao 201H Housing Proj" History

 Document created by Kathy Yoda (kathy.s.yoda@hawaii.gov)
12/03/2018 - 10:29:31 AM HST - IP address: 132.160.239.30

 Document emailed to Jeffrey Pearson (jeff.pearson@hawaii.gov) for signature
12/03/2018 - 10:39:30 AM HST

 Document viewed by Jeffrey Pearson (jeff.pearson@hawaii.gov)
12/03/2018 - 8:23:12 PM HST - IP address: 174.239.9.207





DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 23, 2018

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division – Maui District
 Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Pre-Assessment Consultation and Scoping for Draft Environmental Assessment for the Proposed **Hoku-ao 201H Housing Project**

LOCATION: Island of Lanai; TMK: (2) 4-9-002:061 and (2) 4-9-014:001, 009, and 011

APPLICANT: Ho'okuleana LLC on behalf of Lanai Resorts, LLC

2018 NOV 23 A 11:04
 RECEIVED
 LAND DIVISION
 STATE OF HAWAII

Transmitted for your review and comment is information on the above-referenced subject matter. We would appreciate your comments by **December 13, 2018**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Darlene Nakamura at 587-0417. Thank you.

Attachments

- We have no objections.
- We have no comments. *
- Comments are attached.

Signed: [Signature]
 Print Name: K. Tyler Mills
 Date: 11-23-2018

cc: Central Files

*Not in the Conservation District

Core: MA 19-89

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT



DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

November 23, 2018

MEMORANDUM

TO: **DLNR Agencies:**
 Div. of Aquatic Resources
 Div. of Boating & Ocean Recreation
 Engineering Division
 Div. of Forestry & Wildlife
 Div. of State Parks
 Commission on Water Resource Management
 Office of Conservation & Coastal Lands
 Land Division – Maui District
 Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Pre-Assessment Consultation and Scoping for Draft Environmental Assessment for the Proposed **Hoku-ao 201H Housing Project**

LOCATION: Island of Lanai; TMK: (2) 4-9-002:061 and (2) 4-9-014:001, 009, and 011

APPLICANT: Ho'okuleana LLC on behalf of Lanai Resorts, LLC

2018 NOV 26 PM 2:49
 RECEIVED
 MAUI DISTRICT
 LAND DIVISION

Transmitted for your review and comment is information on the above-referenced subject matter. We would appreciate your comments by **December 13, 2018**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Darlene Nakamura at 587-0417. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: [Signature]
 Print Name: Daniel Ornelas
 Date: 11/28/18

cc: Central Files

Sm 12/18

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

In reply, please refer to:
File:
2018-353 IV

November 20, 2018

Sent Via e-mail

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i, 96734

Subject: Comments Regarding Hōkū-ao 201H Housing Project

Dear Mr. Young:

The Hawaii Department of Health (HDOH), Hazard Evaluation and Emergency Response (HEER) Office provides the following comments regarding the planned Hōkū-ao 201H Housing Project.

- 1) The HEER Office has two open environmental investigations in the project area under the following site names:
 - a. Former Emulsion Plant- Fraser Development Site
 - b. Lanai City Expansion 200 Housing Units

Site Assessment is currently ongoing, and remediation and site close-out activities are pending. 1,2- Dichloropropane (DCP), pesticide, and dioxin contamination associated with the Former Emulsion Plant operations have been detected in the eastern/south-eastern portion of the "Open Space" area (depicted on the Conceptual Lot Plan) west of 12th Street. This area should not be included in any residential development or used for other sensitive use such as a daycare center, playground, school, hospital etc.

PCB and petroleum contamination are suspected to be encountered on the western side of the Open Space area because this was the location of a former power plant. Between the former power plant and the Former Pesticide Emulsion plant is a suspected dumping area.

The area outlined in blue in the Conceptual Lot Plan is currently being investigated by this office under the site name Lanai City Expansion 200 Housing Units. The area is in the Site Assessment stage and results are pending, but pesticide and other contamination (e.g., metals such as arsenic) are suspected in the area due to previous historical use for pineapple and other commercial operations. Should the results show concentrations of contaminants of concern exceeding unrestricted (residential) Environmental Action Levels (EALs), further assessment of subsurface soil and remediation to unrestricted EALs may need to be conducted.

Mr. Young
November 20, 2018
Page 2 of 2

For further detailed information on the type of contamination residing or potentially residing at the property, please submit a request for the full records for these two sites.

Unless all contamination is removed prior to construction, an Environmental Hazard Management Plan (EHMP) will be required for the site(s). The EHMP must be followed during construction to avoid exposure of construction workers and nearby populations to contaminants, and to properly manage the contaminated soil. A Post-Construction update of the EHMP may also be necessary. Adherence to the EHMP and proper disposal of waste according to HDOH Solid and Hazardous Waste Branch (SHWB) rules will be required for any redevelopment of the site. Any potential soil movement and encountered solid waste in this area should be reported to the HDOH HEER Office and SHWB.

- 2) If this project will require Federal funding through the U.S. Department of Housing and Urban Development (HUD), then please be aware that HUD's regulations under the National Environmental Policy Act (NEPA) require that "all property proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gasses, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property." [24 CFR 50.3(i) and 24 CFR 58.5(i)(2)]. Please contact HUD directly concerning any restrictions they may have for this project.
- 3) Please contact the HEER Office at least 90 days prior to the start of construction to review the required environmental plans and documents.

If you have any questions regarding these comments, feel free to contact me at 808-586-4653 or iris.vanderzander@doh.hawaii.gov.

Sincerely,

Iris van der Zander, Ph.D.
Remedial Project Manager
Hazard Evaluation and Emergency Response Office
Hawaii Department of Health

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Hawaii Department of Health (HDOH)
Hazard Evaluation and Emergency Response (HEER) Office
P. O. BOX 3378
Honolulu, HI 96801-3378

April 15, 2019

Sent only via e-mail to iris.vanderzander@doh.hawaii.gov

Re: Hōkūao 201H Housing Project - Draft Environmental Assessment

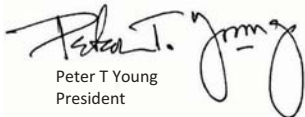
Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above referenced project.

We acknowledge your comments that the HEER Office has two open environmental investigations at the Former Emulsion Plan and the subject project (formerly referred to as Lanai City Expansion 200 Housing Units). No federal funds are anticipated.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC



Peter T Young
President

Do well by doing good.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
SAFE DRINKING WATER BRANCH
ULLUAKUPU BLDG. 4
2385 WAIMANO HOME ROAD, SUITE 110
PEARL CITY, HAWAII 96782-1400

December 11, 2018

BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

In reply, please refer to
File: SDWB
Young01.docx

Mr. Peter T. Young
1539 Kanapuu Drive
Kailua, Hawaii 96734
[via PeterYoung@Hookuleana.com only]

Dear Mr. Young:

SUBJECT: Pre-Assessment consultation and Scoping for Draft Environmental Assessment
Hoku'ao 201H Housing Project – 200-Housing Units (51% Affordable)
TMK: Portions of (2) 4-9-002:061, 4-9-014:001, 009, and 011
Lanai City, Lanai, Hawaii

The Department of Health (DOH), Safe Drinking Water Branch (SDWB) has reviewed the subject document received via email from Dr. Bruce S. Anderson, Director of Health (Director) on November 14, 2018, and has the following comments:

1. It is unclear what the drinking water source will be for the proposed development. Will it be connected to the existing Public Water System (PWS) 237 Lanai City System or will a new source be proposed? Please provide more information on this so the SDWB may review and comment.
2. Depending on the drinking water source, this project may qualify as a new public water system. Federal and state regulations define a public water system as a system that serves 25 or more individuals at least 60 days per year or has at least 15 service connections. All public water system owners and operators are required to comply with Hawaii Administrative Rules (HAR), Chapter 11-20, "Rules Relating to Public Water Systems."
3. All new public water systems are required to demonstrate and meet minimum capacity requirements prior to their establishment. This requirement involves demonstration that the system will have satisfactory technical, managerial and financial capacity to enable the system to comply with safe drinking water standards and requirements in accordance with HAR Section 11-20-29.5, "Capacity demonstration and evaluation."

4. Projects that propose development of new sources of drinking water serving or proposed to serve a public water system must comply with the terms of HAR Section 11-20-29, "Use of new sources of raw water for public water systems." This section requires that all new public water system sources be approved by the Director prior to its use. Such approval is based primarily upon the submission of a satisfactory engineering report which addresses the requirements set in HAR Section 11-20-29.
5. The engineering report must identify all potential sources of contamination and evaluate alternative control measures which could be implemented to reduce or eliminate the potential for contamination, including treatment of the water source. In addition, water quality analyses for all regulated contaminants, performed by a laboratory certified by the State Laboratories Division of the State of Hawaii, must be submitted as part of the report to demonstrate compliance with all drinking water standards. Additional parameters may be required by the Director for this submittal or additional tests required upon his or her review of the information submitted.
6. All sources of public water systems must undergo a source water assessment which will delineate a source water protection area. This process is preliminary to the creation of a source water protection plan for that source and activities which will take place to protect the source of drinking water.
7. Projects proposing to develop new public water systems or proposing substantial modifications to existing public water systems must receive approval by the Director prior to construction of the proposed system or modification in accordance with HAR Section 11-20-30, "New and modified public water systems." These projects include treatment, storage and distribution systems of public water systems. The approval authority for projects owned and operated by a County Board or Department of Water or Water Supply has been delegated to them.
8. All public water systems must be operated by certified distribution system and water treatment plant operators as defined by HAR Chapter 11-25, "Rules Relating to Certification of Public Water System Operators."
9. All projects which propose the use of dual water systems or the use of a non-potable water system in proximity to an existing drinking water system to meet irrigation or other needs must be carefully designed and operated to prevent the cross-connection of these systems and prevent the possibility of backflow of water from the non-potable system to the drinking water system.

- The two (2) systems must be clearly labeled and physically separated by air gaps or reduced pressure principle backflow prevention devices to avoid contaminating the drinking water supply. In addition, backflow devices must be tested periodically to assure their proper operation. Further, all non-potable spigots and irrigated areas should be clearly labeled with warning signs to prevent the inadvertent consumption on non-potable water. Compliance with HAR Chapter 11-21, "Cross-Connection and Backflow Control" is also required.
10. All projects which propose the establishment of a potentially contaminating activity (as identified in the Hawai'i Source Water Assessment Plan) within the source water protection area of an existing source of water for a public water supply should address this potential and activities that will be implemented to prevent or reduce the potential for contamination of the drinking water source.
 11. For further information concerning the application of capacity, new source approval, operator certification, source water assessment, backflow/cross-connection prevention or other public water system programs, please contact the SDWB at 586-4258.

The SDWB Underground Injection Control (UIC) Program has the following comments:

12. The project is located mauka of the UIC line. Areas mauka of the UIC line are considered to overlie underground sources of drinking water. Therefore, no new subclass A injection wells, such as sewage injection wells that receive greater than 1000 gallons per day, will be allowed to be constructed.
13. If your project involves the construction of a drainage injection well (subclass C injection well), you must first obtain the DOH written approval to construct the drainage injection well before any construction commences. HAR Chapter 11-23, UIC's primary purpose is to protect underground sources of drinking water from injection well contamination. Written approval is obtained by filing an application for a UIC permit. You may submit your permit application via electronic filing through the DOH website at <http://eha-cloud.hawaii.gov/epermit> or submit a hard copy permit application to this address: Safe Drinking Water Branch, Uluakupu Bldg. 4, 2385 Waimano Home Road, Suite 110, Pearl City, Hawaii 96782-1400.
14. New drainage injection well construction must be sited beyond one-quarter mile of a drinking water well. If you intend to construct a drinking water well, be careful to site all drainage injection wells at least one-quarter mile away from the drinking water source well.

Mr. Peter T. Young
December 11, 2018
Page 4

15. If you have any questions regarding the UIC rules or the UIC permitting process, please contact the SDWB UIC Program at (808) 586-4258. Additional UIC Program information can be found at <http://health.hawaii.gov/sdwb/underground-injection-control-program/>.

If there are any questions, please call Ms. Joan S. Corrigan of the SDWB Engineering Section at 586-4258.

Sincerely,



JOANNA L. SETO, P.E., CHIEF
Safe Drinking Water Branch

JC:cw

c: Mr. Keith Kawaoka [via keith.kawaoka@doh.hawaii.gov only]

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Hawaii Department of Health (HDOH)
Safe Drinking Water Branch
Uluakupu Bldg. 4
2385 Waimano Home Road, Suite 110
Pearl City, Hawaii 96782-1400

April 15, 2019

Sent only via e-mail to Joan.Corrigan@DOH.Hawaii.Gov

Re: Hōkūāo 201H Housing Project - Draft Environmental Assessment

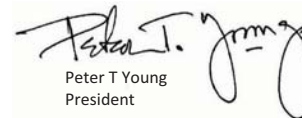
Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above referenced project.

We acknowledge your comments addressing safe drinking water issues. Of note, in response, the project will be connecting to PWS 237. PWS 237 will be seeking approval of a new source water well. Pūlama Lāna'i will complete a source water assessment, as well as address issues you raised in the letter. Likewise, the project will be connecting with the nearby wastewater facility.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC



Peter T Young
President

Do well by doing good.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

In reply, please refer to:
File:

LUD - 2 4 9 002 061 etc Hokuao 201H
Housing Project PreAssmntHD4419

December 24, 2018

Mr. Peter T. Young, President
Ho'okuleana LLC
1539 Kanapu'u Drive
Kailua, Oahu, Hawaii 96734
Email: PeterYoung@Hookuleana.com

Dear Mr. Young:

Subject: Pre-Assessment Consultation and Scoping for Draft Environmental Assessment
Hoku'ao 201H Housing Project - 200 Housing Units (51% Affordable)
TMK: Portions(2) 4-9-002: 061, 4-9-014: 001, 4-9-014: 009 and 4-9-014: 011
Lanai City, Lanai, Hawaii

Thank you for allowing us the opportunity to provide comments for the subject project. The project consists of 200 single family homes. Connection to a wastewater treatment plant will be required for the subject project. The construction of new wastewater treatment plants shall comply with applicable provisions of Hawaii Administrative Rules, Chapter 11-62, Wastewater Systems.

Please be informed that the proposed wastewater systems for the subdivision/development may have to include design considerations to address any effects associated with the construction of and/or discharges from the wastewater systems to any public trust, Native Hawaiian resources or the exercise of traditional cultural practices.

Should you have any questions, please call Mr. Mark Tomomitsu of my staff at 586-4294.

Sincerely,

SINA PRUDER, P.E., CHIEF
Wastewater Branch

LM/MST:lmj

c: Mr. Roland Tejano, DOH-WWB's Maui Staff, via email

Ho'okuleana LLC

... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Hawaii Department of Health (HDOH)
Wastewater Branch
P. O. BOX 3378
Honolulu, HI 96801-3378

April 15, 2019

Sent only via e-mail to mark.tomomitsu@doh.hawaii.gov

Re: Hōkūāo 201H Housing Project - Draft Environmental Assessment

Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above referenced project.

We acknowledge your comments that connection to a wastewater treatment plant will be required. It is intended that the project will connect with the nearby wastewater facility.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC

Peter T Young
President

Do well by doing good.

Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health

If your proposed project:

Requires an Air Pollution Control Permit

You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.

Includes construction or demolition activities that involve asbestos

You must contact the Asbestos Abatement Office in the Indoor and Radiological Health Branch.

Has the potential to generate fugitive dust

You must control all fugitive dust. Note that construction activities that occur near to existing residences, business, public areas and major thoroughfares exacerbate potential dust problems. It is recommended that a dust control management plan be developed which identifies and addresses all activities that may generate fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential dust problems.

Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance problems.

You should provide adequate measures to control dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:

- a) Planning the different phases of construction, focusing on minimizing the amount of dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Providing an adequate water source at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing dust from shoulders and access roads;
- e) Providing adequate dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling dust from debris being hauled away from the project site.

If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch

Clean Air Branch (808) 586-4200 cab@doh.hawaii.gov	Indoor Radiological Health Branch (808) 586-4700
--	---

Ho'okuleana LLC
... to take responsibility ...

Peter T. Young
1539 Kanapu'u Drive
Kailua, Hawai'i 96734
(808) 226-3567 (Cell Phone)
PeterYoung@Hookuleana.com
www.Hookuleana.com



Hawaii Department of Health (HDOH)
Clean Air Branch

April 15, 2019

Sent only via e-mail to cab@doh.hawaii.gov

Re: Hōkūāo 201H Housing Project - Draft Environmental Assessment

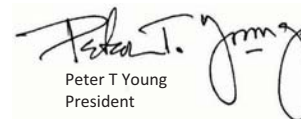
Gentlemen:

Thank you for your response to our Pre-Assessment Consultation and Scoping request for the above referenced project.

We acknowledge your comments addressing best management practices and other clean air matters. BMPs will be incorporated during construction.

A draft Environmental Assessment is being prepared and we will be sending you a copy for your review.

Thanks,
HO'OKULEANA LLC



Peter T Young
President

Do well by doing good.

Peter T Young

From: Peter T Young <peteryoung@hookuleana.com>
Sent: Tuesday, November 20, 2018 1:08 PM
To: 'Kurt Wollenhaupt'
Cc: 'Ann Cua'; 'Clayton Yoshida'
Subject: RE: Lanai Hoku-ao 201 H Housing Project, Carbon Copy Sent

Thank you for your response. We will extend your scoping and pre-assessment consultation response into January.

In addition, in early-January, we would like to meet with you and others at the Planning Department to discuss this project.

May we schedule a time now for early-January? Do you have any preferred dates and times?

Thanks,
Peter.

Peter T. Young, President



1539 Kanapu'u Drive
Kailua, Hawai'i 96734

(808) 226-3567 (Cell Phone)

PeterYoung@Hookuleana.com
www.Hookuleana.com

Do well by doing good.



Save paper, save money - you may not need to print this e-mail.

From: Kurt Wollenhaupt <Kurt.Wollenhaupt@co.maui.hi.us>
Sent: Saturday, November 17, 2018 1:23 PM
To: peterYoung@hookuleana.com
Cc: Ann Cua <Ann.Cua@co.maui.hi.us>; Clayton Yoshida <Clayton.Yoshida@co.maui.hi.us>
Subject: Re: Lanai Hoku-ao 201 H Housing Project, Carbon Copy Sent

Dear Peter

I see Ho'okuleana LLC is preparing the environmental documents for the 200 housing unit 201H project on Lanai and I am in receipt of your request for comment.

Thank you for requesting EA preparation comments on this large and complex project.


As I need to coordinate with Long Range Planning, Plan Implementation Development and Zoning and Enforcement Divisions and due to my leave from the office for most of December, comments will be forthcoming most likely in early January.

I believe that having a meeting with you or one of your staff to acquaint the Department with this project would be useful and of course assist in our comment preparation. Of course the detailed comments will come in the EA review process; however, the coordination of such a large project with all Divisions of the Planning Department is very important.

Coordination of large issues at the outset is important and I need to become more familiar with the project than can be done in just a couple of pages from the request for comment so look forward to a meeting with your staff.

Thank you.

Kurt Wollenhaupt
Planning Department
County of Maui



PARTIES CONSULTED DURING
THE 30-DAY COMMENT
PERIOD FOR THE DRAFT
ENVIRONMENTAL
ASSESSMENT; LETTERS
RECEIVED; AND RESPONSES
TO SUBSTANTIVE COMMENTS

IX



IX. PARTIES CONSULTED DURING THE 30-DAY COMMENT PERIOD FOR THE DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED; AND RESPONSES TO SUBSTANTIVE COMMENTS

The Draft EA was published in the Office of Environmental Quality Control's The Environmental Notice on December 23, 2020. The following agencies, organizations and individuals received a copy of the Draft EA for review and comment during the 30-day comment period. Comment letters received and responses to substantive comments are included in this Chapter.

Federal Agencies

1. U. S. Fish and Wildlife Service
300 Ala Moana Blvd., Rm. 3-122
Honolulu, HI 96850
2. State of Hawai'i
Department of Health
Office of Environmental Quality Control
235 S. Beretania Street, Suite 702
Honolulu, HI 96813
3. State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813
4. State of Hawai'i
Office of Hawaiian Affairs
560 N. Nimitz Highway, Suite 200
Honolulu, HI 96817
5. State of Hawai'i
Department of Health
Environmental Health Administration
P.O. Box 3378
Honolulu, HI 96801
6. State of Hawai'i
Department of Business, Economic
Development & Tourism
Office of Planning
235 S. Beretania Street, 6th Floor
Honolulu, HI 96813
7. State of Hawai'i
Department of Education
P.O. Box 2360
Honolulu, HI 96804
8. State of Hawai'i
Department of Agriculture
1428 South King Street
Honolulu, HI 96814-2512
9. State of Hawai'i
Department of Land and Natural Resources
P. O. Box 621
Honolulu, HI 96809
10. State Land Use Commission
P.O. Box 2359
Honolulu, HI 96804

Maui County Agencies

11. County of Maui
Department of Environmental Management
2050 Main Street, Suite 2B
Wailuku, HI 96793
12. County of Maui
Department of Fire and Public Safety
200 Dairy Road
Kahului, HI 96732
13. County of Maui
Department of Housing and Human
Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

14. County of Maui
Department of Parks and Recreation
700 Halia Nako Street, Unit 2F
Wailuku, HI 96793
15. County of Maui
Maui Police Department
55 Mahalani Street
Wailuku, HI 96793
16. County of Maui
Department of Planning
2200 Main Street, Suite 315
Wailuku, HI 96793
17. County of Maui
Department of Public Works
200 South High Street
Wailuku, HI 96793
18. County of Maui
Department of Transportation
David Trask Building, Suite 102
2145 Kaohu Street
Wailuku, HI 96793
19. County of Maui
Department of Water Supply
200 South High Street, 5th Floor
Wailuku, HI 96793
20. Maui County Council
Honorable Riki Hokama
200 South High Street
Wailuku, HI 96793
21. Maui County Council
Honorable Tasha Kama
200 South High Street
Wailuku, HI 96793
22. Maui County Council
Honorable Alice Lee, Council Chair
200 South High Street
Wailuku, HI 96793
23. Maui County Council
Honorable Gabe Johnson
200 South High Street
Wailuku, HI 96793



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

January 20, 2021

Ms. Lori Tsuhako
Director
Department of Housing and Human Concerns
County of Maui
2200 Main Street, Suite 546
Wailuku, Hawaii 96793

Attention: Mr. Buddy Almeida, Housing Administrator

Dear Ms. Tsuhako:

Subject: Draft Environmental Assessment (EA)
Proposed Hokuao 201H Housing Project
Lanai City, Hawaii
Tax Map Key: (2) 4-9-002:061 (Por.); 4-9-014:001 (Por.) and 009 (Por.)

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject Draft EA and understands Pulama Lanai is proposing to develop a 150-unit single family residential development on approximately 76 acres of land in Lanai City, Lanai. The project is proposed to consist of 76 affordable homes for lease, and 74 market-rate homes for lease, a community center, park, and other improvements.

HDOT has the following comments:

Airports Division (HDOT-A)

1. The proposed housing project is located approximately 8,030 feet from the property boundary of Lanai Airport (LNY). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at the following link:

http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf

2. Prior to construction, Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet.

Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website:

<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

3. Due to the proximity to the airport, the developer and future residents should be aware of potential single event noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location.
4. The HDOT-A recommends that the landscaping plan take into consideration the maturity heights of trees and ensure they do not become obstructions to aircraft approach and departure operations at LNY or create a hazardous wildlife attractant. If the tree(s) become an obstruction or a hazardous wildlife attractant to aircraft operations, the landowner shall be prepared to immediately mitigate the obstruction or hazard upon notification by the HDOT-A and/or FAA.
5. The HDOT-A is concerned about the potential of wildlife attracted to the four proposed detention basins due to standing water and its close proximity to the wastewater treatment plant. We recommend that the developer incorporates appropriate measures to minimize hazardous wildlife attractants.

Stormwater detention ponds should be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and to remain completely dry between storms. Please review the [FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports](#) for guidance.

If the project results in a wildlife attractant, these effects shall be immediately mitigated by the developer upon notification by the HDOT-A and/or FAA.

6. Although the use of solar panels is not mentioned as part of the proposed building architecture, be aware that photovoltaic (PV) systems located in or near the approach path of aircrafts, can create a hazardous condition for pilots because of possible glint and glare reflected from the PV array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the HDOT-A and/or FAA.

PV systems have also been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the HDOT-A and/or FAA.

Highways Division (HDOT-HWY)

The HDOT-HWY has reviewed the Draft EA and Traffic Impact Analysis Report (TIAR) dated November 2, 2018 and have the following comments:

1. Based on the trip generation and conclusion of the TIAR, HDOT-HWY find that the project will not have any significant traffic impacts to Kaunalapau Highway (State route 440).
2. The TIAR and the Draft EA should correct the discrepancy in the total number of proposed housing units with the Draft EA indicating 150 units, whereby the TIAR was based on 200 units.
3. If there are any unexpected traffic issues attributed to the project, the applicant shall mitigate them to the satisfaction of the HDOT-HWY, Maui District Engineer at no cost to the State.
4. The applicant shall coordinate with the HDOT-HWY, Maui District Engineer on any further State roadway related requirements or permits.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,



JADE T. BUTAY
Director of Transportation

c: Peter Young, Hookuleana LLC
Karlynn Fukuda, Munekiyo Hiraga

May 17, 2021

Jade T. Butay, Director
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, Hawai'i 96813-5097

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i, DIR 1123, STP 8.3103

Dear Mr. Butay:

Thank for your letter dated January 20, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)
Kevin Mendes, RM Towill (w/attachment)
Michael Garris, Belt Collins Hawai'i (w/attachment)
Tyler Fuiwara, ATA (w/attachment)

K:\DATA\Pulama Lanai\Lanai City Expansion 1939\Applications\Draft EA\IDEA response letters\IDEA Responses\EXT responses\State of Hawaii Dept of Transportation.docx

* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Airports Division

Comment 01: The proposed housing project is located approximately 8,030 feet from the property boundary of Lanai Airport (LNY). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at the following link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf

Response 01:

The applicant recognizes the comment and will review the TAM and obtain the necessary permits and/or approvals for the Hōkūāo 201H Housing Project.

Comment 02: Prior to construction, Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet.

Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>

Response 02:

The applicant recognizes the comment and will review the FAA requirements and obtain the necessary approvals for the Hōkūāo 201H Housing Project.

Comment 03: Due to the proximity to the airport, the developer and future residents should be aware of potential single event noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location

Response 03:

The applicant recognizes the comment and will inform residents of the Hōkūāo 201H Housing Project of this potential impact, likely through the rental agreement.

Comment 04: The HDOT-A recommends that the landscaping plan take into consideration the maturity heights of trees and ensure they do not become obstructions to aircraft approach and departure operations at LNY or create a hazardous wildlife attractant. If the tree(s) become an obstruction or a hazardous wildlife attractant to aircraft operations, the landowner shall be prepared to immediately mitigate the obstruction or hazard upon notification by the HDOT-A and/or FAA.

Response 04:

The applicant recognizes the comment and will ensure that the landscaping plan proposed for the Hōkūāo 201H Housing Project does not become an obstruction to aircraft approaches and departures from LNY.

Further, the applicant recognizes the comment and will ensure that the landscaping plan proposed for the Hōkūāo 201H Housing Project does not create a hazardous wildlife attractant.

Comment 05: The HDOT-A is concerned about the potential of wildlife attracted to the four proposed detention basins due to standing water and its close proximity to the wastewater treatment plant. We recommend that the developer incorporates appropriate measures to minimize hazardous wildlife attractants. Storm water detention ponds should be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and to remain completely dry between storms. Please review the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports for guidance. If the project results in a wildlife attractant, these effects shall be immediately mitigated by the developer upon notification by the HDOT-A and/or FAA.

Response 05:

The applicant recognizes the comment and will review the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports with its civil engineering consultant, for guidance. If the project results in a wildlife attractant, these effects shall be immediately mitigated by the applicant upon notification by the HDOT-A and/or FAA.

Comment 06: Although the use of solar panels is not mentioned as part of the proposed building architecture, be aware that photovoltaic (PV) systems located in or near the approach path of aircrafts, can create a hazardous condition for pilots because of possible glint and glare reflected from the PV array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the HDOT-A and/or FAA. PV systems have also been known to emit radio frequency interference (RFI) to aviation dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the HDOT-A and/or FAA.

Response 05:

Should the applicant move forward with on-site renewable energy generation as contemplated in multiple sections of the DEA, the applicant will ensure applicable permits and or approvals are obtained for PV systems, including potential RFI systems, within the Hōkūāo 201H Housing Project .

Highways Division

Comment 01: Based on the trip generation and conclusion of the TIAR, HDOT-HWY find that the project will not have any significant traffic impacts to Kaunalapau Highway (State route 440).

Response 01:

The applicant recognizes the confirmation from the Highways Division that the traffic associated with the Hōkūao 201H Housing Project will not have any significant impacts to Kaumālapa'u Highway (State route 440).

Comment 02: The TIAR and the Draft EA should correct the discrepancy in the total number of proposed housing units with the Draft EA indicating 150 units, whereby the TIAR was based on 200 units.

Response 02:

At the time the TIAR (Exhibit G in DEA), the Hōkūao 201H Housing Project was intended to include 200 single family homes.

Several community meetings¹ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūao 201H Housing Project over the last five years. The applicant evaluated many factors, including but not limited to comments and feedback, completed studies, laws, and current market conditions² in the design and offering for the Hōkūao 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

Due to the aforementioned reasons, the number of homes was decreased to 150. Nonetheless the footprint of the development has remained the same and the estimated traffic should be lower (e.g., reduced number of homes should result in lower number of trips associated with the project). The applicant and traffic consultant believe the original TIAR analyses and conclusions remain valid.

The applicant has reflected these changes in the Draft EA, however the studies were completed using 200 homes.

Comment 03: If there are any unexpected traffic issues attributed to the project, the applicant shall mitigate them to the satisfaction of the HDOT-HWY, Maui District Engineer at no cost to the State.

Response 03:

The applicant recognizes and confirms that should any unexpected traffic issues arise from the Hōkūao 201H Housing Project, the applicant will mitigate the issues to the satisfaction of the HDOT-HWY, Maui District Engineer at no cost to the State.

¹ Pūlama Lāna'ī Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

² Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'ī.

Comment 04: The applicant shall coordinate with the HDOT-HWY, Maui District Engineer on any further State roadway related requirements or permits.

Response 04:

The applicant recognizes and confirms that they will coordinate with the HDOT-HWY Maui District Engineer on any further State roadway related requirements or permits.

Chris Sugidono

From: Keiki-Pua Dancil <kdancil@pulamalanai.com>
Sent: Wednesday, January 13, 2021 10:36 AM
To: Karlynn Fukuda; Chris Sugidono
Cc: Olivia Simpson
Subject: FW: DOH Clean Air Branch on EA for Hokuauo 201H Residential Project

From: Cab General [mailto:Cab.General@doh.hawaii.gov]
Sent: Wednesday, January 13, 2021 9:35 AM
To: Keiki-Pua Dancil <kdancil@pulamalanai.com>; peteryoung@hookuleana.com
Subject: DOH Clean Air Branch on EA for Hokuauo 201H Residential Project

Aloha,

Thank you for the opportunity to provide comments on the subject project.
Please see our standard comments at:

<https://health.hawaii.gov/cab/files/2019/08/Standard-Comments-Clean-Air-Branch-2019.pdf>

Please let me know if you have any Questions.

Lisa M.M. Wallace
EHS QA Officer
Clean Air Branch
Environmental Health Office
Hilo, Hawaii 96720

**Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health**

If your proposed project:

Requires an Air Pollution Control Permit

You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.

Includes construction or demolition activities that involve asbestos

You must contact the Asbestos Abatement Office in the Indoor and Radiological Health Branch.

Has the potential to generate fugitive dust

You must control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near to existing residences, business, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.

Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance complaints.

You should provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:

- a) Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Providing an adequate water source at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing airborne, visible fugitive dust from shoulders and access roads;
- e) Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling airborne, visible fugitive dust from debris being hauled away from the project site.

If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch

Clean Air Branch (808) 586-4200 cab@doh.hawaii.gov	Indoor Radiological Health Branch (808) 586-4700
--	---

April 1, 2019

May 17, 2021

Via Email: cab@doh.hawaii.com

Clean Air Branch
State of Hawai'i
Department of Health

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Reviewing Agency:

Thank for your letter dated January 13, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

K:\DATA\Pulama Lanai\Lanai City Expansion 1939\Applications\Draft EA\DEA response letters\DEA Responses\EXT responses\Clean Air Branch.docx

* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: If your proposed project: Requires an Air Pollution Control Permit, you must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.

Response 01:

The applicant will comply with all applicable conditions and requirements as related to Air Pollution Control Permits.

Comment 02: If your proposed project: Includes construction or demolition activities that involve asbestos, you must contact the Asbestos Abatement Office in the Indoor and Radiological Health Branch.

Response 02:

The applicant will comply with all applicable conditions and requirements as related to construction or demolition activities that involve asbestos.

Comment 03: If your proposed project: Has the potential to generate fugitive dust, you must control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near to existing residences, business, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does not require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.

Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance complaints.

You should provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:

- a) Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
- b) Providing an adequate water source at the site prior to start-up of construction activities;
- c) Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d) Minimizing airborne, visible fugitive dust from shoulders and access roads;
- e) Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
- f) Controlling airborne, visible fugitive dust from debris being hauled away from the project site.

Response 03:

In Section 4.13 of the DEA (starting on page 152), and in the Air Quality Study, by B.D. Neal & Associates, included as Exhibit D, there is a discussion of short-term impacts from fugitive dust and the corresponding mitigation measures.

The applicant will implement best management practices and comply with all applicable conditions and requirements as related to fugitive dust.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 3, 2021

County of Maui
Department of Housing and Human Concerns
Attn: Mr. Buddy Almeida
2065 Main Street, Suite 108
Wailuku, Hawaii 96793

via email: buddy.almeida@co.maui.hi.us

Dear Mr. Almeida:

SUBJECT: Draft Environmental Assessment for the Proposed **Hokuao 201H Residential Project** located at Lanai City, Island of Lanai; TMKs: (2) 4-9-002:061 (por.), (2) 4-9-014:001 (por.) and 009 (por.) on behalf of Lanai Resorts, dba Pulama Lanai

Thank you for the opportunity to review and comment on the subject matter. In addition to our previous comments dated January 20, 2021, enclosed are comments from the Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosures

cc: Ho'okuleana LLC w/copies
Attn: Mr. Peter Young (via email: peteryoung@hookuleana.com)
Munekiyo Hiraga w/copies
Attn: Ms. Karlynn Fukuda (via email: planning@munekiyohiraga.com)
Central Files




STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

February 2, 2021

REF: RFD.5561.5

TO: Mr. Russell Tsuji, Administrator
Land Division

FROM: M. Kaleo Manuel, Deputy Director 
Commission on Water Resource Management

SUBJECT: Draft Environmental Assessment for the Proposed Hokuao 201H Residential Project

FILE NO.: RFD.5561.5

TMK NO.: (2) 4-9-002:061, (2) 4-9-014:001, (2) 4-9-014:009

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrn>.

Our comments related to water resources are checked off below.

- 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- 6. We recommend the use of alternative water sources, wherever practicable.
- 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.

9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a steam channel.
16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- OTHER: Planning: Please coordinate with the respective Planning Department and/or Department of Water Supply to incorporate this project into the county water use and development plan. The final EIS should acknowledge that the Lanai Water Company conducts annual water audits to assess their Lanai City system water losses.

If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.

May 17, 2021

M. Kaleo Manuel, Deputy Director
State of Hawai'i
Department of Land and Natural Resources
Commission on Water Resource Management
P. O. Box 621
Honolulu, Hawai'i 96809

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Manuel:

Thank for your letter dated February 03, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)
Kevin Mendes, RM Towill (w/attachment)
Michael Garris, Belt Collins Hawai'i (w/attachment)

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* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.

Response 01:

The Applicant will coordinate with the County Department of Water Supply (DWS) to incorporate this project into the Lāna'i Water Use and Development Plan ("LWUDP"). We note that the DWS was consulted as part of the Draft Environmental Assessment ("DEA") review and provided comments on the project.

Comment 02: We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>

Response 02:

On pages 125 to 127 of the Draft Environmental Assessment ("DEA"), there is a discussion on various water conservation measures that will be incorporated in the project.

To the extent possible, the Applicant will incorporate water efficient fixtures and water efficient practices throughout the development. Lāna'i Water Company was the first water utility in the state to deploy 100% smart meters to its customers. All meters in the Hōkūao 201H Housing Project will have a smart water meter.

Comment 03: We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>

Response 03:

The project will incorporate storm water BMPs and low impact development practices where possible. The project will comply with all County of Maui rules for storm water management and environmental protection. The construction drawings and drainage report(s) will illustrate such compliance and would be submitted as part of the building permit review process.

Comment 04: We recommend the use of alternative water sources, wherever practicable.

Response 04:

To the extent possible, the Applicant will evaluate alternative water sources (e.g., rainwater harvesting, surface water reuse, etc.) where possible.

The Applicant is in the process of permitting the development of Well 7 (an existing source), which will be connected to the Lāna'i City distribution system along with Wells 6, 8 and 3. Well 7 will provide additional source capacity and reliability. This is consistent with the LWUDP, and there is significant discussion in the DEA on pages 102-103 regarding Well 7.

Comment 05: We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.

Response 05:

To the extent possible, the Applicant will incorporate irrigation conservation best management practices throughout the development.

Comment 06: There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.

Response 06:

The project will comply with all State Department of Health recommendations relating to water quality.

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

January 20, 2021

County of Maui
Department of Housing and Human Concerns
Attn: Mr. Buddy Almeida
2065 Main Street, Suite 108
Wailuku, Hawaii 96793

via email: buddy.almeida@co.maui.hi.us

Dear Mr. Almeida:

SUBJECT: Draft Environmental Assessment for the Proposed **Hokuao 201H Residential Project** located at Lanai City, Island of Lanai; TMKs: (2) 4-9-002:061 (por.), (2) 4-9-014:001 (por.) and 009 (por.) on behalf of Lanai Resorts, dba Pulama Lanai

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division – Maui District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosures

cc: Ho'okuleana LLC w/copies
Attn: Mr. Peter Young (via email: peteryoung@hookuleana.com)
Munekiyō Hiraga w/copies
Attn: Ms. Karlynn Fukuda (via email: planning@munekiyohiraga.com)
Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 31, 2020

MEMORANDUM

TO: **DLNR Agencies:**
 ___ Div. of Aquatic Resources
 ___ Div. of Boating & Ocean Recreation
 X Engineering Division (DLNR.ENGR@hawaii.gov)
 X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
 ___ Div. of State Parks
 X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
 ___ Office of Conservation & Coastal Lands
 X Land Division – Maui District (daniel.l.ornellas@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
 SUBJECT: Draft Environmental Assessment for the Proposed **Hokuao 201H Residential Project**
 LOCATION: Lanai City, Island of Lanai; TMKs: (2) 4-9-002:061 (por.), (2) 4-9-014:001 (por.) and 009 (por.)
 APPLICANT: Maui County Department of Housing and Human Concerns on behalf of Lanai Resorts, dba Pulama Lanai

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **January 20, 2021**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on The Environmental Notice in the middle of the page.)

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: *[Signature]*
 Print Name: Daniel Ornello
 Division: Land - MDLO
 Date: 1/7/21

Attachments
cc: Central Files

May 17, 2021

Russell Y. Tsuji, Land Administrator
State of Hawai'i
Department of Land and Natural Resources
Land Division
P. O. Box 621
Honolulu, Hawai'i 96809

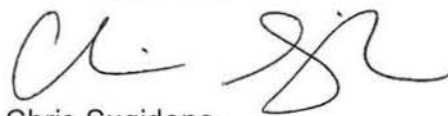
SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Tsuji:

Thank for your letter dated January 20, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we acknowledge that the Department of Land and Natural Resources, Land Division has no comments to offer at this time as the proposed project does not impact any of the Department of Land and Natural Resources, Land Division projects or existing facilities.

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 31, 2020

FROM:

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division (DLNR.ENGR@hawaii.gov)
- Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- Div. of State Parks
- Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- Office of Conservation & Coastal Lands
- Land Division – Maui District (daniel.i.omellas@hawaii.gov)

TO:

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
SUBJECT: Draft Environmental Assessment for the Proposed **Hokuao 201H Residential Project**
LOCATION: Lanai City, Island of Lanai; TMKs: (2) 4-9-002:061 (por.), (2) 4-9-014:001 (por.) and 009 (por.)
APPLICANT: Maui County Department of Housing and Human Concerns on behalf of Lanai Resorts, dba Pulama Lanai

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **January 20, 2021**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on The Environmental Notice in the middle of the page.)

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

- () We have no objections.
- () We have no comments.
- () Comments are attached.

Signed: *Carty S. Chang*
 Print Name: Carty S. Chang, Chief Engineer
 Division: Engineering Division
 Date: Jan 15, 2021

Attachments
cc: Central Files

May 17, 2021

Email: DLNR.ENGR@hawaii.gov

Carty S. Chang, Chief Engineer
State of Hawai'i
Department of Land and Natural Resources, Engineering Division
P. O. Box 621
Honolulu, Hawai'i 96809

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H
Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001
(POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Chang:

Thank for your letter dated January 20, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we acknowledge that the Department of Land and Natural Resources, Engineering Division has no additional comments to offer at this time as the proposed project does not impact any of the Department of Land and Natural Resources, Engineering Division projects or existing facilities.

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



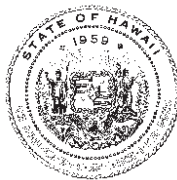
Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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DAVID Y. IGE
Governor



DANIEL E. ORODENKER
Executive Officer

MIKE MCCARTNEY
Director

LAND USE COMMISSION

Department of Business, Economic Development & Tourism
State of Hawai'i

January 21, 2021

Mr. Buddy Alameida
Housing Administrator
County of Maui, Housing Division
Department of Housing and Human Concerns
2299 Main Street, Suite 546
Wailuku, Maui, Hawai'i 96793

Re: Proposed Hōkūao 201H Housing Project (TMK: (2)4-9-002:61 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna`i City, Hawai'i

Dear Mr. Alameida,

Mahalo for the opportunity to provide comments for the Draft Environmental Assessment for the proposed Hōkūao 201H Housing Project.

The Applicant and Property Owner, Pūlama Lāna`i, proposes to develop 150 single family homes of which 76 will be affordable homes for lease (rates according to 201H guidelines) and 74 will be market-rate homes for lease, with a one-acre park, a 1,500-square foot community center for use by the Lāna`i community and 60-parking stalls for use by the Hōkūao project residents.

The project is situated on approximately 76 acres of land in the Kamoku Ahupua`a of Lāna`i Island with most of the project area's topography consisting of flat to gently sloping open scrub lands. An existing drainage swale on the western boundary of the site carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant with a 600-foot buffer between the closest lot and the wastewater treatment plant edge.

Ninth and Twelfth Streets, both of which are currently dirt roads, will be improved as part of this project to facilitate access continuing the existing street grid pattern into the new development. Ninth Street will also have a wide concrete bike/walk path connecting the community to Fraser Avenue. Most of the proposed housing project area is located on former pineapple fields.

The Applicant proposes an affordable housing project to be built under Chapter 201H (Hawai'i Revised Statutes, HRS) which authorize the Hawaii Housing Finance and Development Corporation (HHFDC) and the Counties to develop or assist in the

development of housing projects. The Hōkūao 201 H Housing Project will be processed through Maui County and under 201H-38, there are certain exemptions from the Maui County Code (MCC)- Title 2 Administration and Personnel, Title 12 Streets, Sidewalks and Public Places, Title 16 Building and Construction, Title 18 Subdivisions, Title 19 Zoning and Title 20 Environmental Protection.

The Land Use Commission (LUC) has the following comments to offer:

1. A number of permits or other approvals will be required, and several were identified in the EA. A State Land Use District Boundary Amendment will need to be obtained from the State Land Use Commission. Also, the County of Maui County Council, and County of Maui Department of Public Works are the County regulatory agencies from whom the Applicant will need to obtain exemptions, approvals and permits. Additional permits might be identified subsequently if warranted by modifications, mitigation measures or refinements in the final design.
2. The proposed project appears to meet Hawaii Revised Statutes (HRS) Chapter 226 which serves as a guide for long-term development for the State and provides 1) goals, objectives, and policies; 2) the allocation of resources for the State through planning, coordination and implementation efforts; and 3) priority guidelines for the State. The proposed project also appears to support the Maui 2030 General Plan Countywide Policy Plan, the Lāna`i 2016 Community Plan, and the Lāna`i City Country Town Business District Design guidelines (proposed).
3. Although the EA states on page 102 that there is adequate water supply for the proposed project, it relies heavily on Well 7 which was drilled in 1987 for its water source, even if it has not been regularly used. Pūlama Lāna`i may need to seek other water sources to conform with the requirements of the Commission on Water Resource Management, Department of Health, County of Maui and other regulatory entities as it relates to installation, inspection, and maintenance of water and wastewater systems associated with the project if Well 7 fails to meet expectations.
4. The Lāna`i Water Use and Development Plan (WUDP) includes a list of potential supply options to meet the forecast land use demands and include recommissioning old wells, drilling new wells, desalination, and other source options (see information from Chapter 5 of the Lāna`i WUDP). The construction of the planned desalination plant was halted on September 12, 2014 and in 2015, the Chief Operating Officer of Pūlama Lāna`i stated that the company had not given up on the plant but was reassessing its plans. With the limited water supply options available, the viability of the proposed project currently relies solely on the successful development of Well 7 and an update on Pūlama Lāna`i's desalination plant plans and other alternate considerations may be in order to assure that this development can continue if Well 7 does not perform as expected.

Mr. Buddy Alameida
January 21, 2021
Page 2

5. On page 124, the EA includes mention of the Project District Application Findings of Fact, Conclusions of Law and Decision and Order signed January 21, 2015, where it appears that the Lāna`i Planning Commission issued a Special Use Permit to be valid till June 17, 2029 (it had a 15 year term) and will require a timely review for future requests for time extensions beyond this limit. The applicability and remaining lifespan of this permit to the proposed project needs to be clarified to ensure that any current or future required permitting compliance is met.
6. In 2018, the Lāna`i Planning Commission changed the island's special management boundary to include the entire island, which was the first island-wide boundary change in the state since SMA boundaries were adopted in the 1970s. The EA addresses how the relevant objectives and policies of the Hawai`i Coastal Zone Management (CZM) Program and the proposed actions do not conflict and describes how the proposed project is essentially an extension of similar kinds of uses and activities of the adjoining Lāna`i City. Additional changes or modifications to the proposed development will need to receive similar consideration and approvals if necessary.
7. The EA notes that the initial plans called for 200 single family home units and was adjusted downward to 150 units after initial water demand estimates were established and that the proposed project would still have a long-term reliable water supply. The water demand based on actual consumption rates should be monitored to ensure that the projections were accurate and are within the capacity of Well 7 to fulfill.

Please contact me or the LUC Chief Clerk, Riley Hakoda if you have any further questions at (808) 587-3824.

Sincerely,



Daniel Orodener
Executive Officer

May 17, 2021

Daniel Orodener, Executive Officer
State of Hawai'i
Department of Business, Economic Development & Tourism
Land Use Commission
P. O. Box 2359
Honolulu, Hawai'i 96804

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Mr. Orodener:

Thank for your letter dated January 21, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

K:\DATA\Pulama Lanai\Lanai City Expansion 1939\Applications\Draft EA\DEA response letters\DEA Responses\EXT responses\State Land Use Commission.docx

* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: A number of permits or other approvals will be required, and several were identified in the EA. A State Land Use District Boundary Amendment will need to be obtained from the State Land Use Commission. Also, the County of Maui County Council, and County of Maui Department of Public Works are the County regulatory agencies from whom the Applicant will need to obtain exemptions, approvals and permits. Additional permits might be identified subsequently if warranted by modifications, mitigation measures or refinements in the final design.

Response 01:

The applicant recognizes the comment and will obtain the necessary approvals from the various agencies before construction begins for the Hōkūao 201H Housing Project. The applicant and its attorney are in communication with the State Land Use Commission (SLUC) regarding the Hawai'i Revised Statutes (HRS) 201H District Boundary Amendment process.

Comment 02: The proposed project appears to meet Hawaii Revised Statutes (HRS) Chapter 226 which serves as a guide for long-term development for the State and provides 1) goals, objectives, and policies; 2) the allocation of resources for the State through planning, coordination and implementation efforts; and 3) priority guidelines for the State. The proposed project also appears to support the Maui 2030 General Plan Countywide Policy Plan, the Lāna`i 2016 Community Plan, and the Lāna`i City Country Town Business District Design guidelines (proposed).

Response 02:

The applicant recognizes confirmation by the State Land Use Commission regarding compliance with the aforementioned guidelines and Plans stated in Comment 02.

Comment 03: Although the EA states on page 102 that there is adequate water supply for the proposed project, it relies heavily on Well 7 which was drilled in 1987 for its water source, even if it has not been regularly used. Pūlama Lāna`i may need to seek other water sources to conform with the requirements of the Commission on Water Resource Management, Department of Health, County of Maui and other regulatory entities as it relates to installation, inspection, and maintenance of water and wastewater systems associated with the project if Well 7 fails to meet expectations.

Response 03:

The applicant is in the process of permitting the development of Well 7 (an existing source), which will be connected to the Lāna`i City distribution system along with Wells 6, 8 and 3. Well 7 will provide additional source capacity and reliability. This is consistent with the Lanai Water Use and Development Plan (LWUDP), and there is significant discussion in the DEA on pages 102-103, regarding Well 7.

If Well 7 fails to meet expectations, the applicant will comply with all regulatory requirements and coordinate with the appropriate agencies as needed to add necessary capacity and reliability for the Hōkūao 201H Housing Project.

Comment 04: The Lāna`i Water Use and Development Plan (WUDP) includes a list of potential supply options to meet the forecast land use demands and include recommissioning old wells, drilling new wells, desalination, and other source options (see information from Chapter 5 of the Lāna`i WUDP). The construction of the planned desalination plant was halted on September 12, 2014 and in 2015, the Chief Operating Officer of Pūlama Lāna`i stated that the company had not given up on the plant but was reassessing its plans. With the limited water supply options available, the viability of the proposed project currently relies solely on the successful development of Well 7 and an update on Pūlama Lāna`i's desalination plant plans and other alternate considerations may be in order to assure that this development can continue if Well 7 does not perform as expected.

Response 04:

Please see the response to Comment 03. We also note the SLUC's suggestion to consider alternative water sources for the project if Well 7 is determine unsuitable to service the proposed project.

Comment 05: On page 124, the EA includes mention of the Project District Application Findings of Fact, Conclusions of Law and Decision and Order signed January 21, 2015, where it appears that the Lāna`i Planning Commission issued a Special Use Permit to be valid till June 17, 2029 (it had a 15 year term) and will require a timely review for future requests for time extensions beyond this limit. The applicability and remaining lifespan of this permit to the proposed project needs to be clarified to ensure that any current or future required permitting compliance is met.

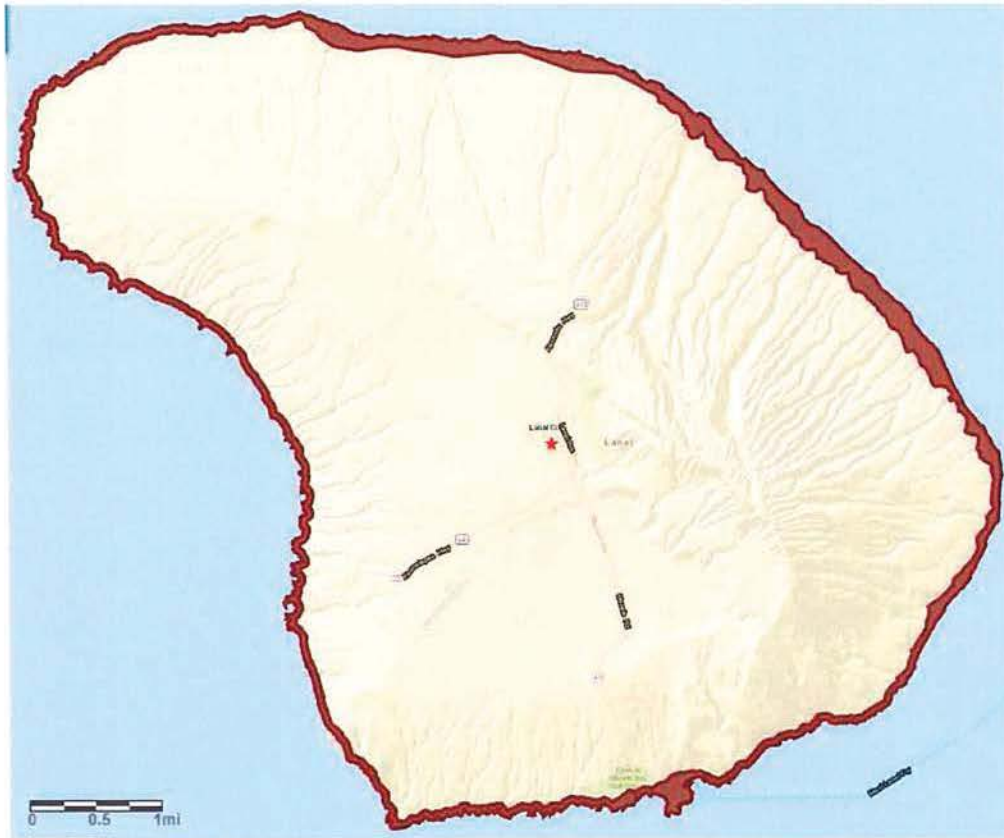
Response 05:

The applicant recognizes that Comment 05 is in reference to the desalination plant. At this time the applicant is not considering the desalination plant for the Hōkūao 201H Housing Project. Should the applicant need to consider another water source, the applicant will comply with any permits and approvals necessary for the development of the water source.

Comment 06: In 2018, the Lānaʻi Planning Commission changed the island's special management boundary to include the entire island, which was the first island-wide boundary change in the state since SMA boundaries were adopted in the 1970s. The EA addresses how the relevant objectives and policies of the Hawaiʻi Coastal Zone Management (CZM) Program and the proposed actions do not conflict and describes how the proposed project is essentially an extension of similar kinds of uses and activities of the adjoining Lānaʻi City. Additional changes or modifications to the proposed development will need to receive similar consideration and approvals if necessary.

Response 06:

We note the comment regarding the SMA boundaries for the island of Lānaʻi. It is our understanding that the Lānaʻi Planning Commission (LPC) did amend the SMA boundaries in 2018, but it does not include the entire island. Please see the graphic below with the current SMA boundary indicated for the island of Lānaʻi in a "rust" color. The proposed project area is located outside of the amended SMA boundary for Lānaʻi. The Hōkūāo 201H Residential Project location is indicated by a red star in the center of the graphic.



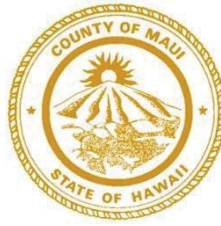
Source: <https://histategis.maps.arcgis.com/>

Comment 07: The EA notes that the initial plans called for 200 single family home units and was adjusted downward to 150 units after initial water demand estimates were established and that the proposed project would still have a long-term reliable water supply. The water demand based on actual consumption rates should be monitored to ensure that the projections were accurate and are within the capacity of Well 7 to fulfill.

Response 07:

Please see response to Comment 03. The Lanai Water Company is required to submit monthly pumpage reports on its website and also provides the same information on a quarterly basis to the Commission on Water Resource Management. As such, there is an existing mechanism to monitor the water consumption rates on Lāna'i.

MICHAEL P. VICTORINO
Mayor
DAVID C. THYNE
Fire Chief
BRADFORD K. VENTURA
Deputy Fire Chief



DEPARTMENT OF FIRE & PUBLIC SAFETY
FIRE PREVENTION BUREAU
COUNTY OF MAUI
313 MANEA PL.
WAILUKU, HI 96793

January 8, 2021

Department of Housing & Human Concerns
Attn: Buddy Almeida, Housing Administrator
2200 Main Street, Suite 546
Wailuku, HI 96793

SUBJECT: PROPOSED HOKUAO 201H HOUSING PROJECT
TMK: (2) 4-9-002:061 (POR), (2) 4-9-014:001 (POR), AND 009 (POR)

Dear Buddy,

Thank you for allowing our office to provide comment on the proposed project. As per your request, comments are provided below:

- At this time, there are no comments in regards to the Draft Environmental Assessment (EA) for the proposed Hokuao 201H Housing Project.
- Our office does reserve the right to comment on the proposed project during the building permit review process should detailed plans for this project be routed to our office for review. At that time, fire apparatus access, water supply for fire protection, and fire and life safety requirements associated with the subject project will be formally reviewed.

If there are any questions or comments, please feel free to contact me at (808) 876-4693 or by email at ryan.otsubo@mauicounty.gov.

Sincerely,

A handwritten signature in black ink that reads "Ryan Otsubo".

Ryan Otsubo, Captain - Fire Prevention Bureau

cc: Peter Young, Ho'okuleana LLC
Karlynn Fukuda, Munekiyo Hiraga (201H Preparer)

May 17, 2021

Ryan Otsubo, Captain
County of Maui
Department of Fire and Public Safety
Fire Prevention Bureau
313 Manea Place
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H
Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001
(POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Otsubo:

Thank for your letter dated January 08, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we acknowledge that the Department of Fire and Public Safety, Fire Prevention Bureau has no comments to offer at this time. We recognize that the Department of Fire and Public Safety, Fire Prevention Bureau reserves the right to comment on the proposed project during the building permit review process.

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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MICHAEL P. VICTORINO
MAYOR

OUR REFERENCE
YOUR REFERENCE

POLICE DEPARTMENT

COUNTY OF MAUI

55 MAHALANI STREET
WAILUKU, HAWAII 96793
(808) 244-6400
FAX (808) 244-6411

January 12, 2021



TIVOLI S. FAAUMU
CHIEF OF POLICE

DEAN M. RICKARD
DEPUTY CHIEF OF POLICE

Mr. Buddy Almeida
Housing Administrator
County of Maui
Department of Housing
and Human Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

Dear Mr. Almeida:

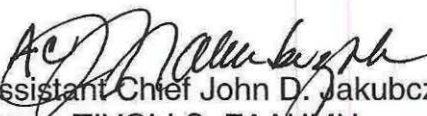
SUBJECT: Proposed Hokuao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR and 009 (POR.)), Lanai City

This is in response to your letter dated December 21, 2020, requesting comments on the above subject.

We have reviewed the application for this project and have no comments at this time.

Thank you for giving us the opportunity to comment on this project.

Sincerely,


Assistant Chief John D. Jakubczak
for: TIVOLI S. FAAUMU
Chief of Police

c: Peter Young, Ho'okuleana LLC
✓ Karlynn Fukuda, Munekiyo Hiraga (201H Preparer)

May 17, 2021

John D. Jakubczak, Assisant Chief
County of Maui
Police Department
55 Mahalani Street
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Jakubczak:

Thank for your letter dated January 12, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we acknowledge that the Police Department has no comments to offer at this time as the proposed project does not impact any of the Police Department projects or existing facilities.

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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MICHAEL P. VICTORINO
Mayor
MICHELE CHOUTEAU MCLEAN, AICP
Director
JORDAN E. HART
Deputy Director



DEPARTMENT OF PLANNING
COUNTY OF MAUI
ONE MAIN PLAZA
2200 MAIN STREET, SUITE 315
WAILUKU, MAUI, HAWAII 96793

January 22, 2021

Mr. Buddy Almeida, Housing Administrator
County of Maui, Housing Division
2065 Main Street, Suite 108
Wailuku, Hawaii 96793

Dear Mr. Almeida:

SUBJECT: REQUEST FOR COMMENTS REGARDING THE PREPARATION OF AN ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED HOKUAO 201H-38 HOUSING PROJECT, LOCATED IN LANAI CITY, ISLAND OF LANAI, HAWAII; TMKS: (2) 4-9-002:61 (POR.), (2) 4-9-014:001 (POR.), AND (2) 4-9-014:009 (POR.) (EAC 2020/0015)

The Department of Planning (Department) is in receipt of the proposed Hokuao 201H-38 Residential Housing Project Request for Comments in preparation of the Draft Environmental Assessment (DEA). The Department understands from the project précis that the proposed Hokuao Housing Project comprises approximately 76-acres of land in Lanai City. Hokuao is proposed to be developed as an affordable housing project under the provisions of Hawaii Revised Statutes (HRS) Chapter 201H. The Hokuao project proposes: 150 single family homes (76 affordable homes for lease, 74 market rate homes for lease); lot sizes will be generally 8,000 square feet; and homes will reflect the existing design vernacular of Lanai City. Along the east edge bordering the school fields, the project provides a one-acre park, a 1,500 square foot community center for use by the Lanai community, and 60 parking stalls for use by the Hokuao project residents. An existing drainage swale on the western boundary carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant (WWTP) with a 600 foot buffer between the closest lot at the WWTP edge.

Further, the Department understands that the use of County lands for the relocation of existing sewer lines and improvements in the County right-of-way for Ninth and Twelfth Streets is the HRS 343 trigger for the preparation of an EA. The approving agency for the EA is the Department of Housing and Human Concerns, County of Maui. The EA covers actions for the State Land Use Commission District Boundary Amendment review and the Maui County Council 201H affordable housing application review.

The Department offers the following comments.

1. The Department notes split land use designations for the parcel with regards to County Community Plan designations and County Zoning. Overlay the detailed project site plan on maps/diagrams showing each of these plan and zoning designations and the "splits" for the project site in the DEA.

2. The Applicant requests an exemption from Section 20.070 Maui County Code (MCC), Sidewalks. Many traffic-related tragedies, including those involving pedestrians, can be prevented by taking a proactive and preventive approach to roadway safety. In line with Vision Zero, Complete Street principles are also paramount to healthy and safe communities. Complete Streets are designed and operated to enable safe access for all users including pedestrians, bicyclists, motorists and transit riders (e.g. DOE, MEO) of all ages and abilities. Communities that are designed and constructed with these fundamental and critical planning principles provide for socially equitable, convenient, safe and healthy living opportunities for all residents. Statistics indicate that pedestrian and bicycle related fatalities and injuries occur on both urban and rural roadways and in some cases there are more pedestrian deaths in rural areas than in urban areas. Maui County is currently in the process of developing a Vision Zero Maui Action Plan, with input from the Vision Zero Advisory Group, community members and partners, to identify strategies that will eliminate preventable traffic deaths and injuries. In light of the foregoing, the Department asks the Applicant to consider dedicated pedestrian connectivity throughout the project via walkways/sidewalks made of grasscrete, asphalt or concrete that connect to the project entry main points. It is difficult to ascertain if such sidewalks are proposed within the project between dwellings.
3. A 1,500 square foot community center for use by the Lanai community and 60 parking spaces for use by the Hokuao project residents are proposed. Are there parking spaces dedicated for non-Hokuao residents who will be using the community center? Please elaborate on the facilities inside the center and the process of administration and reservations for use.
4. The development proposes a reduction in the front-yard setback to five feet from the normally required 15 feet in residential districts in order to expand the usable area of the back yard and to promote greater separation between houses. Please elaborate if this really promotes a safe pedestrian experience and if a reduction to a five foot front yard setback is excessive, given that the lots average 8,000 square feet.
5. Evaluate the mix and location of market rate and affordable rate dwellings in order to prevent a segregation of units by rental price within the project.
6. Further elaborate on the affordable rental rate program and how such a program will work if qualified affordable rental candidates cannot readily be found. Is there a tiered approach to rental similar to that in a for-purchase project? What priorities and procedures, if any, will be used to determine allocation of rental dwellings?
7. When is the trigger to build the community center and one-acre park? These amenities should be completed prior to the occupancy of the first dwelling unit.

8. Provide adequate storage space on-site for lawn and other equipment to maintain the property.
9. Provide a detailed site plan showing trash enclosure areas, all 60 parking spaces available to project residents, sidewalks and connectivity patterns from Ninth and Twelfth Streets, proposed house types on each lot, architectural design of the community center, and proposed signage for the project.
10. Do the units include a washer and dryer? If not, the Applicant should consider an onsite laundry facility for its residents (similar to Lahaina Surf, Front Street Apartments, Hale Mahaolu Kulamalu, Luana Gardens, etc.).
11. The Department is concerned about the project's proximity to the WWTP and requests the Applicant to assess wind patterns and smells with regards to the project location. Are there alternative site plans to reduce this possible nuisance?
12. Estimates of project absorption run into eight years in the future, depending upon the timeline of other residential project buildouts on Lanai. As the DEA anticipates the 76 for rent workforce homes will be oversubscribed, discuss the merits and concerns about increasing the ratio of affordable to market rate rentals for the project.
13. Good design is always critical, especially in affordable communities. Provide a series of streetscapes that demonstrates the look of homes along a typical street section. The Department requests that multiple dwelling elevations be mixed throughout the community to enhance visual interest.
14. Discuss the pros and cons of adding carports to the homes with slab parking and whether such carports could be used for the installation of photovoltaic panels.
15. Discuss installing photovoltaic panels on the roofs of the project houses to help offset energy demands and costs.
16. Are there fence separations between homes on the side and backyards? If so what materials will be used for these fences?
17. Landscaping is frequently difficult to maintain. How will lawn maintenance and landscaping be done? Will individuals be able to personalize their dwellings with plantings?
18. What is the proposal for project lighting, especially with regards to pedestrian safety and dark skies?
19. The landscaping plan should consider the incorporation and the use of grass swales or bio swales, tailored to native plants, to capture and naturally filter urban storm water runoff from the parking lot for the 60 vehicles.

Mr. Buddy Almeida, Housing Administrator
January 22, 2021
Page 4

Thank you for the opportunity to comment on the preparation of the DEA for the Hokuao 201H Residential Project. Should you require further clarification, please contact the Planning Department at planning@mauicounty.gov or at (808) 270-8205.

Sincerely, *



MICHELE MCLEAN, AICP
Planning Director

xc: Jordan E. Hart, Deputy Director (PDF)
Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)
John S. Rapacz, Planning Program Administrator (PDF)
Kurt F. Wollenhaupt, Staff Planner (PDF)
Kathleen Aoki, Planning Program Manager (PDF)
Pam Eaton, Planning Program Administrator (PDF)
Paul Critchlow, Staff Planner (PDF)
Keiki-Pua Dancil, Pulama Lanai (PDF)
Peter Young, Consultant (PDF)
Buddy Almeida, Housing Administrator, DHHC (PDF)
Karlynn Fukuda, President, Munekiyo Hiraga (PDF)
Project File

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May 17, 2021

Michele McLean, Planning Director
County of Maui
Department of Planning
2200 Main Street, Suite 315
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Ms. McLean:

Thank for your letter dated January 22, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibits "A" and "B"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Attachments

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachments)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachments)
Olivia Simpson, Pūlama Lāna'i (w/attachments)
Calvert Chipchase, Cades Schutte (w/attachments)
Molly Olds, Cades Schutte (w/attachments)

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* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: The Department notes split land use designations for the parcel with regards to County Community Plan designations and County Zoning. Overlay the detailed project site plan on maps/diagrams showing each of these plan and zoning designations and the "splits" for the project site in the DEA.

Response 01:

Although the comment is not within the scope of the draft Environmental Assessment (DEA), the applicant recognizes the comment regarding the request and will provide the Department with information in **Exhibit "B"**. The following table is provided to assist in the "splits."

TMK No.	Zoning: Community Plan	Zoning: County
[2] 4-9-002:061 (por)	Park	AG Agriculture
[2] 4-9-014:001 (por)	Park	Interim
	Public/ Quasi-public	Interim
	Mixed-Use Residential	Interim
	Open Space	Road
	Park	Road
		Road
[2] 4-9-014:009 (por)	Open Space	OS 2 Active Open Space
	Public/ Quasi-public	OS Open Space
	Park	OS Open Space

Comment 02: The Applicant requests an exemption from Section 18.20.070 Maui County Code (MCC), Sidewalks. Many traffic-related tragedies, including those involving pedestrians, can be prevented by taking a proactive and preventive approach to roadway safety. In line with Vision Zero, Complete Street principles are also paramount to healthy and safe communities. Complete Streets are designed and operated to enable safe access for all users including pedestrians, bicyclists, motorists and transit riders (e.g. DOE, MEO) of all ages and abilities. Communities that are designed and constructed with these fundamental and critical planning principles provide for socially equitable, convenient, safe and healthy living opportunities for all residents. Statistics indicate that pedestrian and bicycle related fatalities and injuries occur on both urban and rural roadways and in some cases there are more pedestrian deaths in rural areas than in urban areas. Maui County is currently in the process of developing a Vision Zero Maui Action Plan, with input from the Vision Zero Advisory Group, community members and partners, to identify strategies that will eliminate preventable traffic deaths and injuries. In light of the foregoing, the Department asks the Applicant to consider dedicated pedestrian connectivity throughout the project via walkways/sidewalks made of grasscrete, asphalt or concrete that connect to the project entry main points. It is difficult to ascertain if such sidewalks are proposed within the project between dwellings.

Response 02:

On page 14 in the Draft Environmental Assessment ("DEA"), there is a discussion about the master planning for the Hōkūāo 201H Housing Project, which highlights the pedestrian connectivity throughout the the Hōkūāo 201H Housing Project. (See **Figure 1**).

- Along Ninth Street (extension), one of the primary ingress/egress roads, there will be curb/gutter and pedestrian sidewalks connecting the the Hōkūāo 201H Housing Project to Lāna'i City.
 - The extension will have no parking signs along both sides for the first 250 feet.
 - The Ninth Street (extension) sidewalk will start at Fraser Avenue being 5.5 feet wide, then after the first 250 feet, it will be 7.5 feet wide, then go to 8 feet wide to the end of the roadway.
- The Twelfth Street (extension), the other primary ingress/egress road, sidewalk will be 8 feet wide throughout.

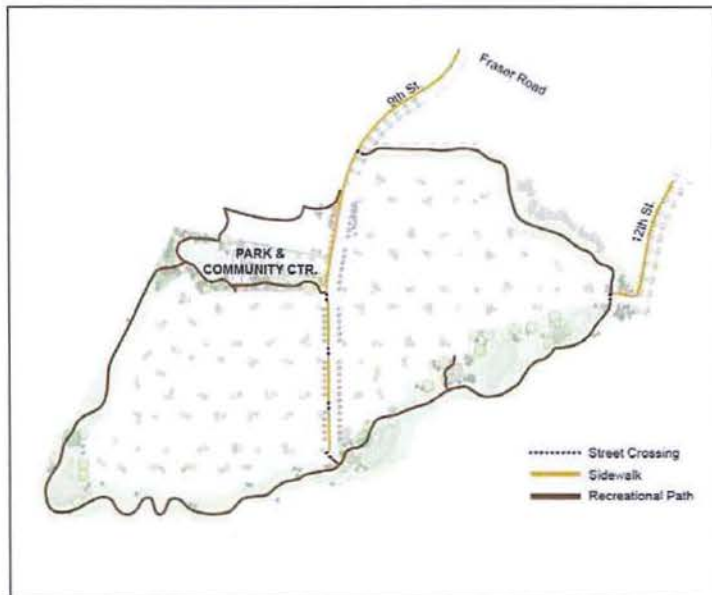


Figure 1: Sidewalk and Recreational path diagram for the Hōkūāo 201H Housing Project (see legend).

Comment 03: A 1,500 square foot community center for use by the Lanai community and 60 parking spaces for use by the Hokuao project residents are proposed. Are there parking spaces dedicated for non-Hokuao residents who will be using the community center? Please elaborate on the facilities inside the center and the process of administration and reservations for use

Response 03:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the parking stalls located near the community center, details regarding facilities inside the center, and the process of administration and reservation for use.

The parking lot is intended to be used by community members (residents of Hōkūāo and non-residents of Hōkūāo) when visiting the community center or park.

The detailed design of the community center has not been finalized. The process of administration and reservation for use will be managed by Pūlama Lāna'i, this process has not been finalized as well.

Comment 04: The development proposes a reduction in the front-yard setback to five feet from the normally required 15 feet in residential districts in order to expand the usable area of the back yard and to promote greater separation between houses. Please elaborate if this really promotes a safe pedestrian experience and if a reduction to a five foot front yard setback is excessive, given that the lots average 8,000 square feet.

Response 04:

See response to Comment 02. In addition, see the graphic below of streetscape renderings of a "typical" residential street. (See Figure 2).

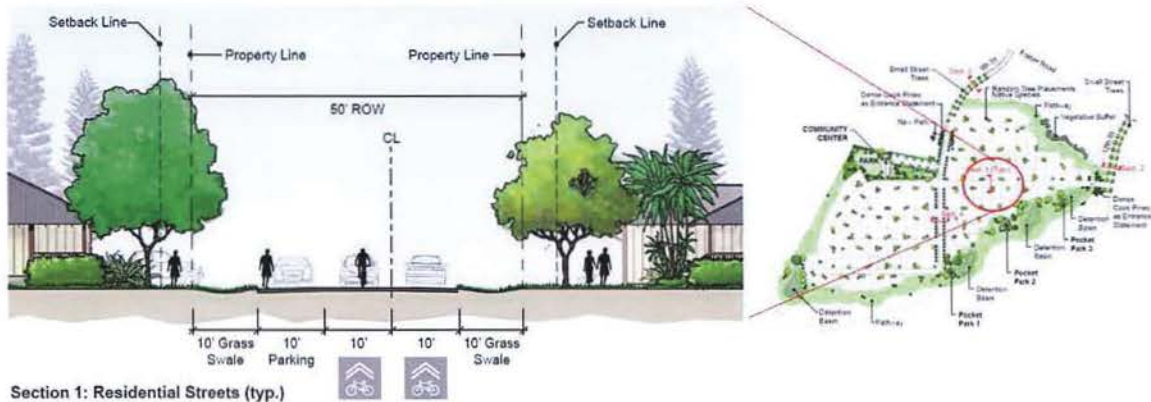
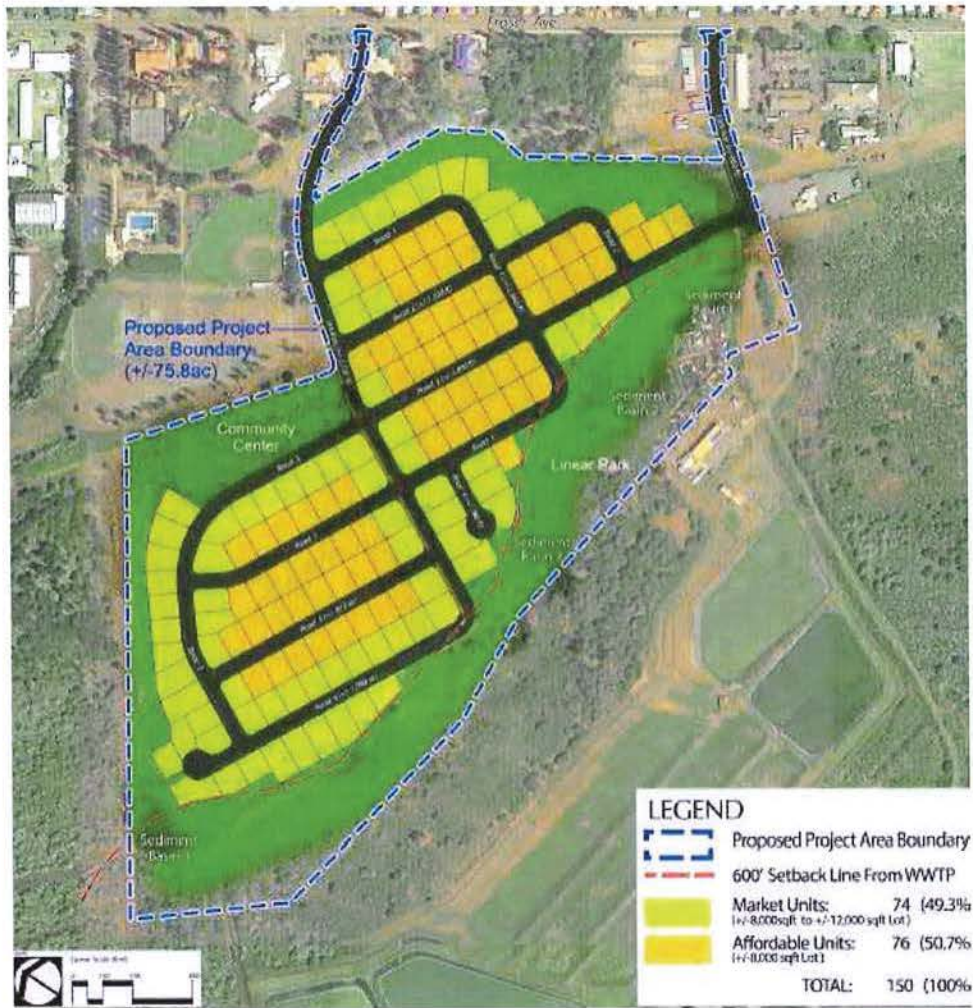


Figure 2: The graphic on the left is a "typical" streetscape in the residential streets, the graphic on the right shows you where this typical street is located within the Hōkūāo 201H Residential Project.

Comment 05: Evaluate the mix and location of market rate and affordable rate dwellings in order to prevent a segregation of units by rental price within the project.

Response 05:

The Hōkūāo 201H Housing Project is compliant to the 201H guidelines, at least 51% of the proposed units would be rented at affordable rates as outlined by the County guidelines for Lānaʻi. In the DEA on page 29, the project site plan is shown (conceptual lot plan). The market units surround the perimeter of the project and the affordable units comprise the center of the project site. There is no segregation of units by rental price within the project. (See **Figure 3**). Additionally, the affordable units and 2 bedroom market units are proposed to utilize the same plans and would therefore, be indistinguishable.



**Hokuao Homes 201H Housing
Conceptual Lot Plan**
10/16/2020



Figure 3: Market units are identified as "neon" green on the perimeter of the site plan and affordable units are identified as "orange" in the interior of the site plan.

Comment 06: Further elaborate on the affordable rental rate program and how such a program will work if qualified affordable rental candidates cannot readily be found. Is there a tiered approach to rental similar to that in a for-purchase project? What priorities and procedures, if any, will be used to determine allocation of rental dwellings?

Response 06:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the affordable rental program. Several community meetings¹ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūāo 201H Housing Project over the last five years. The applicant evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions² in the design and offering for the Hōkūāo 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

The applicant manages many rental units for the workforce on Lāna'i. The Hōkūāo 201H Housing Project will add an additional 150 units, which is needed on the island. The applicant has visibility into the workforce on Lāna'i (demand) and is confident that there will be qualified candidates for the affordable units. The applicant has not finalized the rental application process at this time.

Comment 07: When is the trigger to build the community center and one-acre park? These amenities should be completed prior to the occupancy of the first dwelling unit.

Response 07:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding schedule and timing for building the community center and one-acre park relative to the occupancy of the first dwelling unit.

Comment 08: Provide adequate storage space on-site for lawn and other equipment to maintain the property.

Response 08:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the request to provide adequate storage space on-site for lawn and other equipment to maintain the property.

¹ Pūlama Lāna'i Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

² Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'i.

Comment 09: Provide a detailed site plan showing trash enclosure areas, all 60 parking spaces available to project residents, sidewalks and connectivity patterns from Ninth and Twelfth Streets, proposed house types on each lot, architectural design of the community center, and proposed signage for the project.

Response 09:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment.

In the DEA the following illustrations can be located:

- Page 20: conceptual architectural drawings of the site plan, front elevation, and side elevation for the two bedroom home
- Page 21: conceptual architectural drawings of the site plan, front elevation, and side elevation for the four bedroom home
- Page 28: sample landscape plan outlining the connectivity of Ninth and Twelfth Street from Fraser Avenue to the proposed project
- Page 69: conceptual rendering of site plan of two bedroom row of homes
- Page 70: conceptual rendering of site plan of four bedroom cul-de-sac of homes

The detailed design of the community center and associated parking lot has not been finalized. Conceptual drawings of the landscape plan show the general location of the community center and associated parking on page 68 of the DEA.

The proposed signage for the project has not been finalized. The applicant will comply with regulations in the Maui County Code regarding signage.

Comment 10: Do the units include a washer and dryer? If not, the Applicant should consider an onsite laundry facility for its residents (similar to Lahaina Surf, Front Street Apartments, Hale Mahaolu Kulamalu, Luana Gardens, etc.).

Response 10:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding inclusion of a washer and dryer or on-site laundry facilities.

The homes will include a washer and dryer.

Comment 11: The Department is concerned about the project's proximity to the WWTP and requests the Applicant to assess wind patterns and smells with regards to the project location. Are there alternative site plans to reduce this possible nuisance?

Response 11:

Site selection

The project location was selected due to the proximity to Lāna'i City (extension of the City) and community amenities (e.g., school, market, businesses, etc.). It is close enough that future residents of the Hōkūao 201H Housing Project could walk to these establishments.

Proximity to the Wastewater Treatment Plant ("WWTP")

Exhibit D and Section 4.12 Air Quality (starting on page 152) of the DEA includes an extensive discussion regarding the air quality impacts of the project area. A study by B.D. Neal & Associates, included as Exhibit D, described the methodology and findings of potential short and long term air quality impacts that could occur as a result of construction and use of the proposed development and suggested mitigation measures to reduce any potential air quality impacts where possible and appropriate. Potential impacts on the proposed development from the nearby wastewater treatment facility (aka WWTP) was also evaluated. The study utilized both national and state ambient air quality standards ("AAQS").³

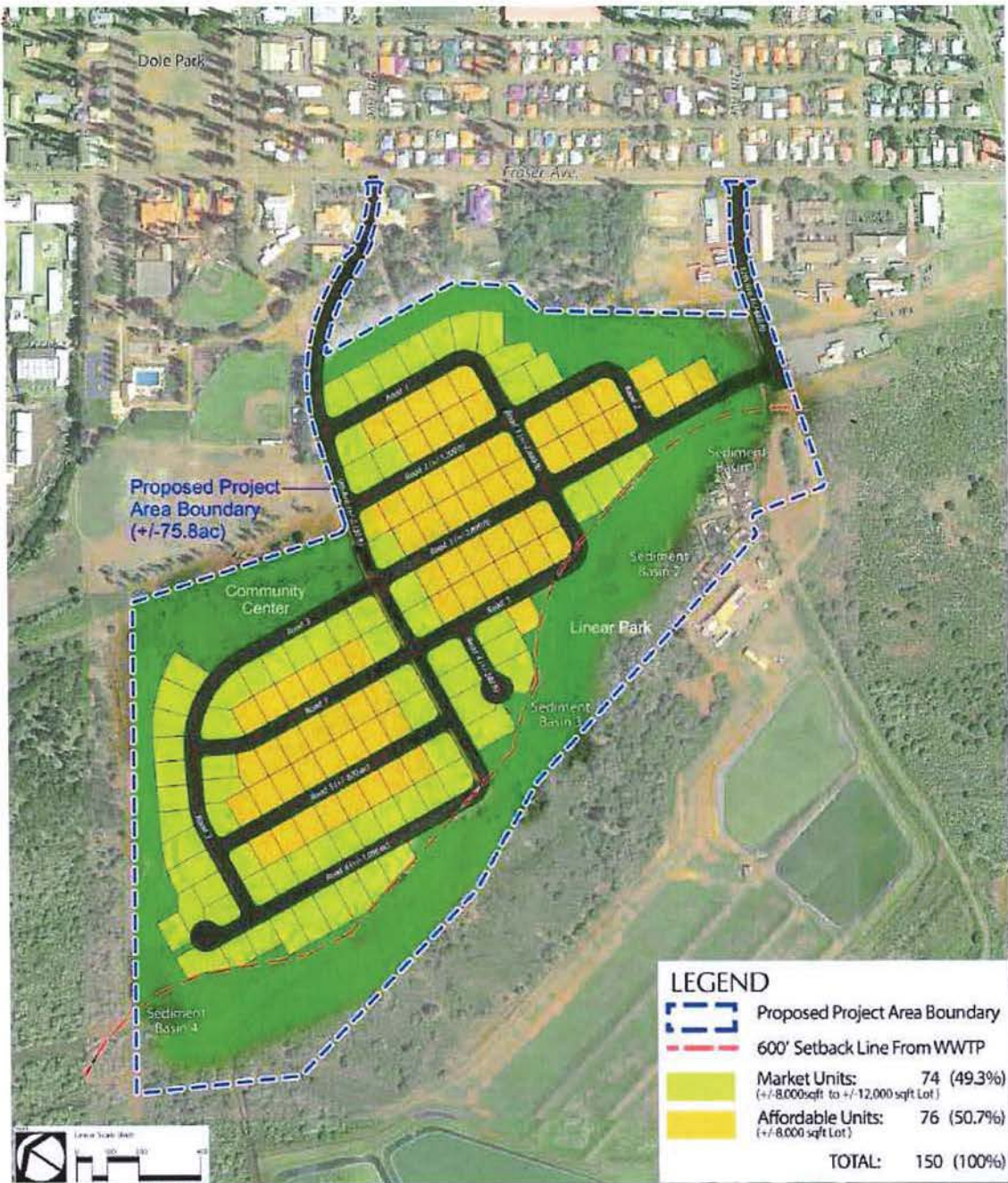
As detailed in Section 8 in Exhibit D, generally WWTPs are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds.⁴ It is further stated that these types and compounds in the air are generally not considered hazardous to human health, but when they occur in high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses.

A study was conducted and described in Section 8. Hydrogen sulfide measurements were collected, there were no measurable hydrogen sulfide concentrations at any location along the plant perimeter. It was recommended by the consultant that it would be prudent for the proposed project to maintain a buffer distance at least 300 to 600 feet from the WWTP boundary.⁵ The Hōkūao 201H Housing Project implemented the maximum recommendation buffer of 600 feet from the WWTP boundary (see **Figure 4**).

³ National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations, while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1 in Exhibit D summarizes the standards.

⁴ Exhibit D Section 8 Waste Water Treatment Plant

⁵ Exhibit D Section 9 Conclusions and Recommendations



Hokuao Homes 201H Housing
Conceptual Lot Plan
10/16/2020



Figure 4: Dotted red line depicts the 600 foot setback line from the WWTP.

Comment 12: Estimates of project absorption run into eight years in the future, depending upon the timeline of other residential project buildouts on Lanai. As the DEA anticipates the 76 for rent workforce homes will be oversubscribed. Discuss the merits and concerns about increasing the ratio of affordable to market rate rentals for the project.

Response 12:

Although the comment is not within the scope of the Draft Environmental Assessment (“DEA”), the applicant recognizes the comment increasing the ratio of affordable to market rate rentals. Several community meetings⁶ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūao 201H Housing Project over the last five years. The applicant has evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions⁷ in the design and offering for the Hōkūao 201H Housing Project. The applicant’s proposed project is the collective outcome of these considerations.

According to the 2019 American Community Survey,⁸ Lāna’i has the lowest poverty rate in the County (see **Figure 5**). The applicant also has visibility into the income of their workforce. The applicant is concerned that the homes in the affordable category will sit empty if the ratio is increased to a higher proportion, due to income qualifications. Lāna’i is different than Maui. The main issue is the lack of inventory, not necessarily the “affordability” of homes. On Lāna’i, multi-generations live in one home because there is a lack of inventory, not because they cannot afford to relocate. As stated above, the applicant’s proposed project, including the current ratio of affordable to market units, is the collective outcome of many considerations.

Poverty Rate

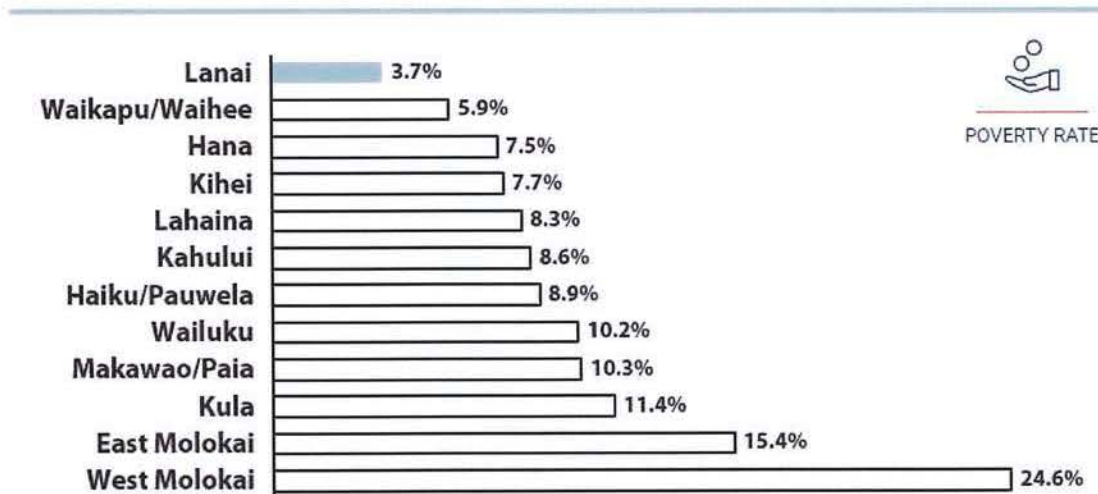


Figure 5: Poverty rate for Maui County according to 2019 American Community Survey.

⁶ Pūlama Lāna’i Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.
⁷ Global pandemic, the impact of the Coronavirus has affected the world, including Lāna’i.
⁸ Data downloaded on 16JAN21 from <https://data.census.gov>, 2019 American Community Survey

Comment 13: Good design is always critical, especially in affordable communities. Provide a series of streetscapes that demonstrates the look of homes along a typical street section. The Department requests that multiple dwelling elevations be mixed throughout the community to enhance visual interest.

Response 13:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment.

In the DEA the following illustrations can be located:

- Page 69: conceptual rendering of site plan of two bedroom row of homes
- Page 70: conceptual rendering of site plan of four bedroom cul-de-sac of homes

In addition, see **Figure 6** for an illustrative rendering of a street view of two bedroom homes. The homes are similar in vernacular to the Lāna'i City homes.



PERSPECTIVE 01
STREET VIEW: GROUP OF HOMES
HOKŪAO SUBDIVISION
NOVEMBER 23, 2020



UPPER WORKS

Figure 6: Illustrative street view on the corner of 9th Street and a row (depicted as red in the site plan located in the bottom right of Figure).

Comment 14: Discuss the pros and cons of adding carports to the homes with slab parking and whether such carports could be used for the installation of photovoltaic panels.

Response 14:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding adding carports to the homes to support the installation of photovoltaic panels.

There are multiple references regarding solar energy production on-site, including home battery storage, for the homes in the Draft Environmental Assessment ("DEA").⁹ The applicant is also evaluating the potential to install a solar roof on the homes, which would include a battery energy storage system. The applicant believes that this is the better option for on-site renewable energy.

Comment 15: Discuss installing photovoltaic panels on the roofs of the project houses to help offset energy demands and costs.

Response to 15:

See response to Comment 14.

Comment 16: Are there fence separations between homes on the side and backyards? If so what materials will be used for these fences?

Response 16:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding fencing between homes on the side and backyards.

The applicant has not finalized the detailed site plan at this time. Should fencing be installed, the applicant will comply with rules and regulations regarding the installation and construction of fencing.

Comment 17: Landscaping is frequently difficult to maintain. How will lawn maintenance and landscaping be done? Will individuals be able to personalize their dwellings with plantings?

Response 17:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment landscaping on each home site.

The rental agreements and homeowners association documents have not been finalized, details regarding landscaping and maintenance will be included in the aforementioned documents and agreements.

⁹ DEA Pages 191, 209, Exhibit D Page 27, and Exhibit F Page 15.

Comment 18: What is the proposal for project lighting especially with regards to pedestrian safety and dark skies?

Response 18:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding lighting with regards to pedestrian safety and dark skies.

Upon approval, the applicant will comply with all rules and regulations regarding lighting and dark skies.

Comment 19: The landscaping plan should consider the incorporation and the use of grass swales or bio swales tailored to native plants, to capture and naturally filter urban storm water runoff from the parking lot for the 60 vehicles

Response 19:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the landscaping plan for the community center parking lot.

See response to Comment 02.

In addition, there are multiple references to the use of grass swales in the DEA. Regarding drainage, see section 4.6.2 on page 87-89, the discussion includes grass swales.

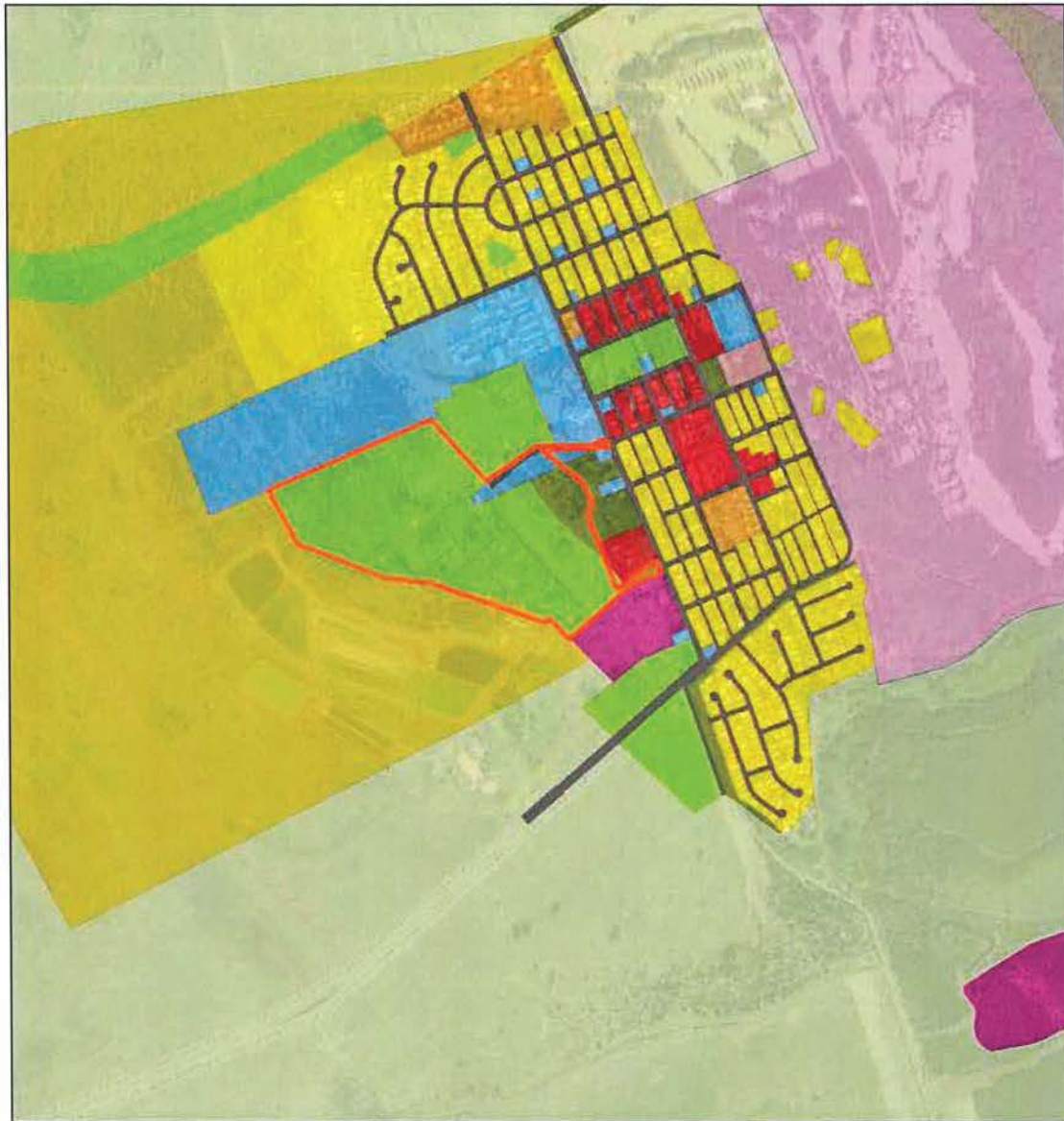
Also on page 28 of the DEA, there are multiple detention basins and references to native species in the proposed landscape plan. See **Figure 7**, included here for visual convenience.



Figure 7: Conceptual Landscape Plan included in DEA.



Lāna'i Community Plan with Hōkūao 201H Residential Project



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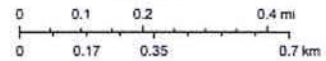
Hokuao Project Boundary for GIS 2 - Project Boundary

Community Plan Authoritative

- Agriculture
- Commercial
- Hotel
- Light Industrial
- Mixed-Use Residential
- Multi-Family

- Open Space
- Park
- Park-Golf Course
- Project District
- Public/Quasi Public
- Road
- Single Family
- State Land Use Conservation

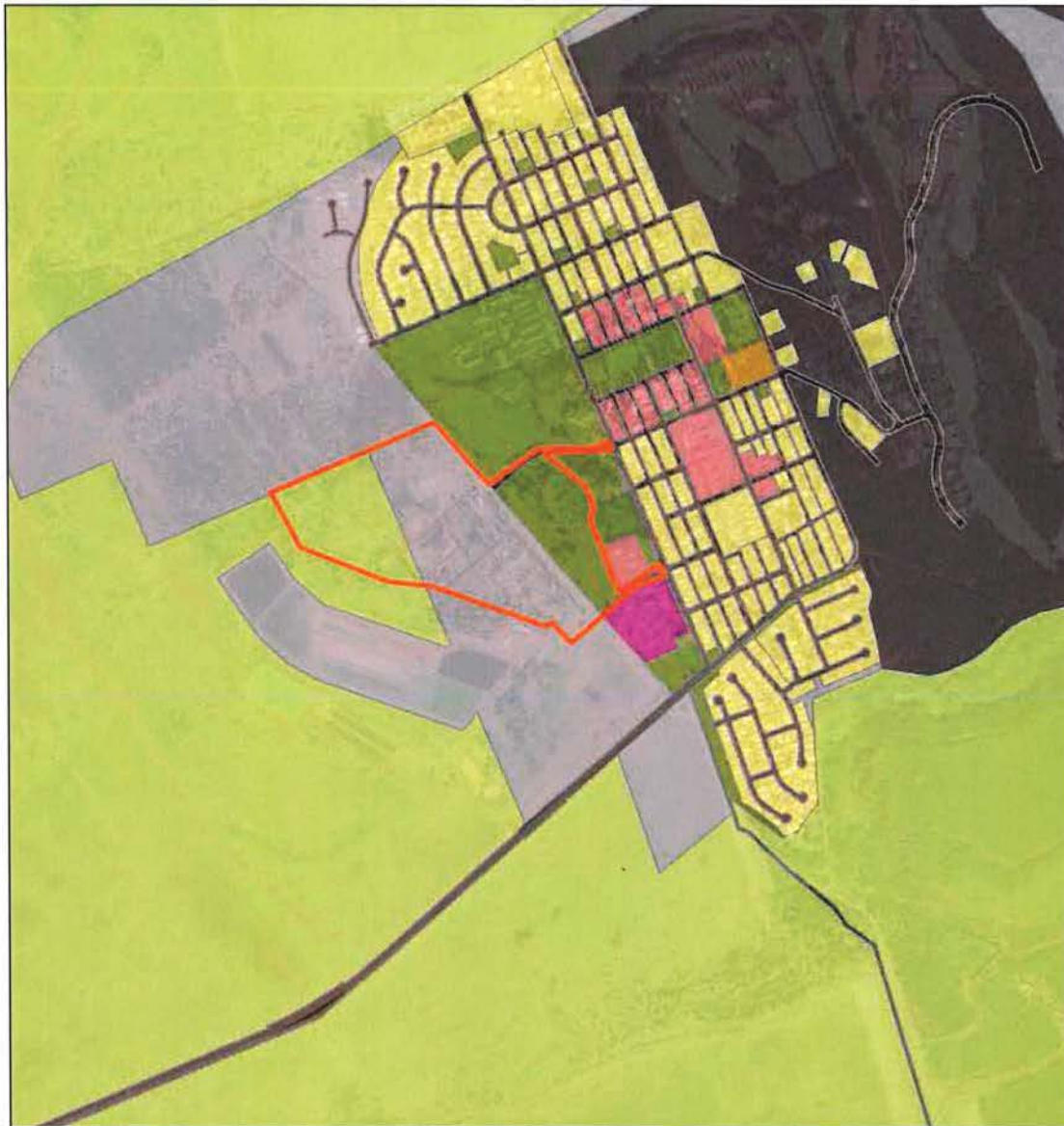
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Resource Mapping Hawaii, GeoEye, Maxar

Pūlama Lāna'i
State Land Use Commission, Feb 2012 | Resource Mapping Hawaii, GeoEye, Maxar |

Maui County Zoning with Hōkūāo 201H Residential Project



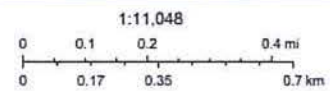
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Hokuao Project Boundary for GIS 2 - Project Boundary

Lanai Zoning Authoritative

- AG Agriculture
- R-1 Residential
- R-2 Residential
- R-3 Residential
- A-1 Apartment
- PD Project District
- B-CT Business-Country Town

- P-1 Public/Quasi-Public
- OS Open Space
- OS-2 Active Open Space
- PK Park
- M-1 Light Industrial
- H-1 Hotel
- Road
- INT Interim



Resource Mapping Hawaii, GeoEye, Maxar

MICHAEL P. VICTORINO
Mayor
MICHELE CHOUTEAU MCLEAN, AICP
Director
JORDAN E. HART
Deputy Director



DEPARTMENT OF PLANNING
COUNTY OF MAUI
ONE MAIN PLAZA
2200 MAIN STREET, SUITE 315
WAILUKU, MAUI, HAWAII 96793

January 22, 2021

Mr. Buddy Almeida, Housing Administrator
County of Maui, Housing Division
2065 Main Street, Suite 108
Wailuku, Hawaii 96793

Dear Mr. Almeida:

SUBJECT: REQUEST FOR COMMENTS REGARDING THE PREPARATION OF AN ENVIRONMENTAL ASSESSMENT (EA) FOR THE PROPOSED HOKUAO 201H-38 HOUSING PROJECT, LOCATED IN LANAI CITY, ISLAND OF LANAI, HAWAII; TMKS: (2) 4-9-002:61 (POR.), (2) 4-9-014:001 (POR.), AND (2) 4-9-014:009 (POR.) (EAC 2020/0015)

The Lanai Planning Commission (LPC) received the proposed Hokuao 201H-38 Residential Housing Project Request for Comments of the Draft Environmental Assessment (DEA) transmitted by the County of Maui Department of Planning. The LPC understands that the proposed Hokuao Housing Project comprises approximately 76-acres of land in Lanai City. Hokuao is proposed to be developed as an affordable housing community under the provisions of Hawaii Revised Statutes (HRS) Chapter 201H. The Hokuao project proposes: 150 single family homes (76 affordable homes for lease, 74 market rate homes for lease); lot sizes will be generally 8,000 square feet; and homes will reflect the existing design vernacular of Lanai City. Along the east edge bordering the school fields, the project provides a one-acre park, a 1,500 square foot community center for use by the Lanai community, and 60 parking stalls for use by the Hokuao project residents. An existing drainage swale on the western boundary carries storm water away from the existing town and community center. On the western flank, the project sets back from the existing wastewater treatment plant (WWTP) with a 600 foot buffer between the closest lot at the WWTP edge.

Further, the LPC understands that Applicant/Petitioner notes the use of county lands for the relocation of existing sewer lines and improvements in the County right-of-way for Ninth and Twelfth Streets is the HRS 343 trigger for the preparation of an EA. The approving agency for the EA is the Department of Housing and Human Concerns, County of Maui. The EA covers actions for the State Land Use Commission District Boundary Amendment review and the Maui County Council 201H affordable housing application review.

The LPC offers the following comments.

1. The LPC requests that the Applicant explain why the focus on providing affordable housing to the Lanai community appears to have shifted from a for-sale model to this 100% rental community, as was described in prior community meetings and in appendices of the DEA. Although the Commission recognizes the urgent need for housing on Lanai and supports a range of residential products, it recognizes the

- hopes and expectations of community members that new housing projects would be available for fee simple ownership. Explain this shift to developing rental housing, rather than for-sale housing.
2. The LPC brought up a housing list which likely consists of people waiting for affordable housing. Will this list and names be used during the selection process for affordable rentals at this project? And if so, how would the list be used?
 3. Part of the role of an EA is to explore alternatives to the project. While some discussion is noted in the DEA, the LPC would like to see alternative scenarios discussed as follows:
 - a. Analyze the alternative of developing a rent-to-own plan for some or the entire project.
 - b. Analyze the alternative of making this project a for sale affordable project.
 - c. Analyze the alternative of making some of the affordable homes “for sale” rather than only “for rent.”
 - d. Analyze the alternative of making some of the affordable homes either a four or three bedroom dwelling, under for rent or for sale scenarios. None of the affordable homes are four bedrooms, yet many large families on Lanai are expected to be significantly under-housed due to the typical small size of dwelling units on the island of Lanai.
 4. The LPC recognizes the legal and administrative challenges of targeting the affordable rental homes to specific groups such as teachers, nurses, long-time Lanai residents, longtime Lanai renters, small business owners, etc.; however, the LPC requests a discussion in the FEA of criteria for rental selection and methods that may be employed to assist in targeting this affordable rental community to high priority groups as previously mentioned. In particular, the LPC requests the Applicant clarify how this project will specifically support long-time Lanai residents/families who intend to live here long-term but have not been able to afford their own home. Please clarify the intent to whom this housing will be targeted, and the role Pulama Lanai will play in the renter selection process if any. Discuss potential lease terms for renters.
 5. Please respond to the concern expressed that the proposed project would be used to house construction workers arriving from off-island for future projects, rather than for existing, qualifying residents in need of housing.
 6. Clarify that Lanai Housing and Urban Development guidelines for affordable income limits for rental units will be employed for this project, recognizing the higher cost of living on Lanai. What are the target ranges of AMI to be considered for this project and associated rental rates?

7. Page 102 of the DEA states, *“Well 7 was drilled in 1987, it will be the water source for the Hokuao project. Well 7 is at ground level of 2,100 feet; the well depth is 1,650 feet. The well is expected to average sustainable pumping of 300,000 GPD; as noted in the following, the estimated water demand is lower than 121,700 GPD. The project fits within the Lanai WUDP. Well 7 has never been in regular use. Activating and using Well 7 has been identified as the planned source for domestic water needs at Hokuao 201H Housing Project.”*

The LPC would like the FEA to describe the current status of Well 7, when the water was last tested at Well 7 and what the results were, and what the anticipated date of activation and use of Well 7 are.

8. Page 209 of the DEA states, *“Homes may include solar photovoltaic on-site generation with individual home battery.”* Who would pay for such an installation on rental units? How would energy savings be passed through to the renter? What criteria would be used to determine which units could have PV installed?
9. Discuss the applicability of **HRS §196-6.5 Solar water heater system required for new single-family residential construction** for this project and any proposed applications for a variance from this requirement.
10. Local experience indicates that Kona winds will result in odor from the WWTP south/southwest of the Project. Please explain the methodology of determining that odors from the WWTP would only be a minor issue, and who made that determination.
11. Page 139 of the DEA states, *“At build-out the average daily de facto population of the community will be some 418 fulltime residents. The cumulative resident household income during the first 10 years of occupancy will total \$70.4 million, and will stabilize at \$12.1 million annually thereafter.”* Discuss why the Applicant believes such estimates of household income are important for this project review. Is an increase in median income anticipated? If so, will that increase be driven by an increase in wages of current residents, or new residents to the island? Does the Applicant believe this new income will be generated by off-island residents moving to Lanai? If the homes are for people who are already on Lanai, does it make sense to discuss the total household income of the community when potential tenants may just be moving from another part of town to this new rental project?
12. Further elaborate on water usage and provide data that shows the project’s proposed water demand, plus the island’s current water usage combined with the approved water allocation for entitled projects. Plot this data graphically against the threshold set by the Commission on Water Resource Management. This data should be shown in an easily read graphical format. Please state the level of approved water consumption where the need for a well on the windward side of

the island will be triggered in the context of the current level of approved water consumption.

13. Page 9 of the DEA states, *“The project also includes a one-acre park, a 1,500 square foot community center for use by the Lanai community, and 60-parking stalls for use by the Hokuao project residents.”* What are these 60 parking stalls for project residents intended to be used for? Are residents allowed to park extra vehicles in these stalls? Are these stalls to be used by residents when they are using the community center? Where are non-project residents to park when they make use of the community center?
14. Where are resident’s guests to park when visiting? What provision for parking is made for residents who have more than two cars? Is there adequate off-street parking for additional cars for residents and/or visitors?

Thank you for the opportunity to comment on the preparation of the EA for the Hokuao 201H Residential Project. Should you require further clarification, please contact the Planning Department at planning@mauicounty.gov or at (808) 270-8205.

Sincerely,



MICHELE MCLEAN, AICP
Planning Director

xc: Jordan E. Hart, Deputy Director (PDF)
Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)
John S. Rapacz, Planning Program Administrator (PDF)
Kurt F. Wollenhaupt, Planner (PDF)
Kathleen Aoki, Planning Program Manager (PDF)
Pam Eaton, Planning Program Administrator (PDF)
Paul Critchlow, Staff Planner (PDF)
Keiki-Pua Dancil, Pulama Lanai (PDF)
Peter Young, Consultant (PDF)
Buddy Almeida, Housing Administrator, DHHC (PDF)
LoriAnn Tshako, Director, DHHC (PDF)
Karlynn Fukuda, President, Munekiyo Hiraga (PDF)
Leilani Ramoran (PDF)
Members of the Lanai Planning Commission (PDF) to be sent by Leilani Ramoran
Project File

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K:\WP_DOCS\Planning\EAC\2020\0015_Hokuao201HHousing\LPC Hokuao 201H Comment Letter

May 17, 2021

Michele McLean, Planning Director
County of Maui
Department of Planning
Lāna'i Planning Commission
2200 Main Street, Suite 315
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Ms. McLean:

Thank for your letter dated January 22, 2021 providing the Lāna'i Planning Commission comments, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

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* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

The applicant recognizes that the Maui County Planning Department solicited feedback from the Lānaʻi Planning Commission ("LPC") on the Draft Environmental Assessment ("DEA").¹ The applicant appreciates the time that the LPC spent on soliciting feedback from residents. The comments below do not represent the comments on the project from the public at the January 20, 2021 LPC meeting, and the applicant would like to recognize those comments by referencing the seven (7) letters of written support² and ten (10) residents that provided oral testimony in support of the project.³

Comment 01: The LPC requests that the Applicant explain why the focus on providing affordable housing to the Lanai community appears to have shifted from a for-sale model to this 100% rental community, as was described in prior community meetings and in appendices of the DEA. Although the Commission recognizes the urgent need for housing on Lanai and supports a range of residential products, it recognizes the hopes and expectations of community members that new housing projects would be available for fee simple ownership. Explain this shift to developing rental housing, rather than for-sale housing.

Response 01:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the adjustment from a for sale model to a rental product. Several community meetings⁴ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūāo 201H Housing Project over the last five years. The applicant has evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions⁵ in the design and offering for the Hōkūāo 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

Affordable housing is needed on Lānaʻi, and this topic has been discussed at numerous venues for over several decades. The Hōkūāo 201H Housing Project is a complement to other residential housing projects, such as the proposed Lānaʻi City Maui County Affordable Housing Project ("County Project")^{6 7 8 9} and the future residential development for the State of Hawaiʻi Department of Hawaiian Home Lands ("DHHL").

According to news reports,¹⁰ the infrastructure cost impeded the progress of the County Project (e.g., land locked and far from current infrastructure). The Hōkūāo 201H Housing Project is sited adjacent to the County Project (See **Figure 1**). Completing the Hōkūāo 201H Housing Project would bring the infrastructure closer to the property line of the proposed County Project site. This could bring down the cost of the infrastructure of the County Project (e.g., shorten the distance to install new infrastructure).

¹ Agenda Item C1 on January 20, 2021: <https://www.mauicounty.gov/ArchiveCenter/ViewFile/Item/27895>

² Written testimony on Item C1 on January 20, 2021:

https://www.mauicounty.gov/DocumentCenter/View/125526/012021_Testimony-Combined-1-13?bidId=

³ Public testimony on Item C1 on January 20, 2021 on pages 12 to 20 of the LPC minutes

<https://www.mauicounty.gov/ArchiveCenter/ViewFile/Item/27988>

⁴ Pūlama Lānaʻi Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

⁵ Global pandemic, the impact of the Coronavirus has affected the world, including Lānaʻi.

⁶ <https://www.mauicounty.gov/DocumentCenter/View/8995/Lanai-City-Affordable-Housing-Project-Power-Point?bidId=>

⁷ <http://mauicounty.us/wp-content/uploads/2018/02/Maui-Affordable-Housing-Implementation-Plan-FINAL.pdf> (pages 106 - 108)

⁸ <https://www.hawaiinewsnow.com/story/30613200/affordable-housing-project-stalls-on-lanai/>

⁹ <https://www.mauinews.com/news/local-news/2015/10/lanai-residents-grill-arakawa-on-stalled-affordable-housing-project/>

¹⁰ Ibid



Figure 1: Aerial map from Google Earth of Lānaʻi City with red outline for the Hōkūāo 201H Residential project, yellow outlines identified here for the County Project, future school expansion, and DHH future residential development.

Comment 02: The LPC brought up a housing list which likely consists of people waiting for affordable housing. Will this list and names be used during the selection process for affordable rentals at this project? And if so, how would the list be used?

Response 02:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the rental application process and a possible "waitlist."

The applicant is working on the details regarding the qualification, verification, and rental application process for the affordable homes. Should this project receive approvals from the County Council and State Land Use Commission, the details will be finalized and shared with the community on Lānaʻi.

The applicant does not maintain a waitlist for existing market rate rental inventory.

Comment 03: Part of the role of an EA is to explore alternatives to the project. While some discussion is noted in the DEA, the LPC would like to see alternative scenarios discussed as follows:

- Analyze the alternative of developing a rent-to-own plan for some or the entire project.
- Analyze the alternative of making this project a for sale affordable project.
- Analyze the alternative of making some of the affordable homes "for sale" rather than only "for rent."
- Analyze the alternative of making some of the affordable homes either a four or three bedroom dwelling, under for rent or for sale scenarios. None of the affordable homes are four bedrooms, yet many large families on Lanai are expected to be significantly under-housed due to the typical small size of dwelling units on the island of Lanai.

Response 03:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment of exploring alternatives regarding the product offering. Several community

meetings¹¹ and smaller focus group meetings have occurred regarding the Hōkūao 201H Housing Project over the last five years. The applicant has evaluated many factors, included but not limited to comments and feedback, completed studies, laws, and current market conditions¹² in the design and offering for the Hōkūao 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

Comment 04: The LPC recognizes the legal and administrative challenges of targeting the affordable rental homes to specific groups such as teachers, nurses, long-time Lanai residents, longtime Lanai renters, small business owners, etc.; however, the LPC requests a discussion in the FEA of criteria for rental selection and methods that may be employed to assist in targeting this affordable rental community to high priority groups as previously mentioned. In particular, the LPC requests the Applicant clarify how this project will specifically support long-time Lanai residents/families who intend to live here long-term but have not been able to afford their own home. Please clarify the intent to whom this housing will be targeted, and the role Pūlama Lanai will play in the renter selection process if any. Discuss potential lease terms for renters.

Response 04:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment of the application selection process.

The applicant is working on the details regarding the application process for the affordable homes and will coordinate with DHHC on the details of said process. Should this project receive approvals from the County Council and State Land Use Commission, the details will be finalized and shared with the community on Lānaʻi.

In the DEA, there are multiple references to workforce housing.¹³ The homes will be provided to the workforce on Lānaʻi, which will include employees of Pūlama Lānaʻi and affiliate companies and other entities that are necessary to maintain essential operations on Lānaʻi (e.g., teachers, police officers, TSA agents, nurses, etc.).

Comment 05: Please respond to the concern expressed that the proposed project would be used to house construction workers arriving from off-island for future projects, rather than for existing, qualifying residents in need of housing.

Response 05:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding construction workers living in the Hōkūao 201H Housing Project.

¹¹ Pūlama Lānaʻi Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

¹² Global pandemic, the impact of the Coronavirus has affected the world, including Lānaʻi.

¹³ DEA pages 133, 137-139, and Exhibit F.

Comment 06: Clarify that Lanai Housing and Urban Development guidelines for affordable income limits for rental units will be employed for this project, recognizing the higher cost of living on Lanai. What are the target ranges of AMI to be considered for this project and associated rental rates?

Response 06:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding target ranges of AMI and associated rental rates to be considered for this project.

The ranges of AMI and associated rental rates to be considered for this project, as well as other affordable housing projects, are reviewed and set by the Maui County Department of Housing and Human Concerns ("DHHC") Housing Division on an annual basis. The AMI and associated rental rates are published every May. The information published on the DHHC website for 2020 specifically for Lānaʻi¹⁴ was included on page 24 in the DEA.

Based on the market analysis (Exhibit F of the Draft EA), for the affordable homes, it was concluded that the following should be generally considered (pages 137 to 138 of the DEA): 21.6% for low income; 37.4% for below moderate to moderate income; and 41% above moderate income.

Comment 07: The LPC would like the FEA to describe the current status of Well 7, when the water was last tested at Well 7 and what the results were, and what the anticipated date of activation and use of Well 7 are.

Response 07:

The applicant is in the process of permitting the development of Well 7 (an existing source), which will be connected to the Lānaʻi City distribution system along with Wells 6, 8 and 3. Well 7 will provide additional source capacity and reliability. This is consistent with the LWUDP, there is significant discussion in the DEA on pages 102-103 regarding Well 7.

We anticipate the activation and use of Well 7 to occur no later than the time the first occupant moves into their home at the proposed project. Prior to any connection to the public water system, the well is required to be approved by the Safe Drinking Water Branch and undergo new source water testing. The compounds that will be tested can be found here:

<https://health.hawaii.gov/sdwb/files/2019/07/ContaminantsTestNewSources2019.pdf>

¹⁴ See page 29 of 39 for the income limits for rental units and affordable rent guidelines for Lānaʻi:
<https://www.mauicounty.gov/DocumentCenter/View/121898/2020-Workforce-Housing---Affordable-Sales-Guidelines?bidId=>

Comment 08: Page 209 of the DEA states, "Homes may include solar photovoltaic on-site generation with individual home battery." Who would pay for such an installation on rental units? How would energy savings be passed through to the renter? What criteria would be used to determine which units could have PV installed?

Response 08:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding costs associated with on-site renewable energy generation.

The applicant is the sole investor in the Hōkūao 201H Housing Project, all associated costs with the development of the Hōkūao 201H Housing Project are part of the investment, including the potential on-site renewable energy generation for all the homes.

Comment 09: Discuss the applicability of HRS §196-6.5 Solar water heater system required for new single-family residential construction for this project and any proposed applications for a variance from this requirement.

Response 09:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the applicability of HRS §196-6.5 Solar water heater system required for new single-family residential construction and whether the applicant will be applying for a variance.

HRS §196-6.5 Solar water heater system required for new single-family residential construction, is applicable to the Hōkūao 201H Housing Project, by definition (new single family residential construction). There are also list of variances that are applicable, in particular §196-6.5 (a) (3): a renewable energy technology system, as defined in section 235-12.5, is substituted for use as the primary energy source for heating water.¹⁵

There are multiple references regarding solar energy production on-site, including home battery storage, for the homes in the Draft Environmental Assessment ("DEA").¹⁶ The applicant is also evaluating the potential to install a solar roof on the homes, which would include a battery energy storage system. These renewable energy systems would provide power to the home, therefore the hot water heater would also be powered by renewable energy sources.

Given the aforementioned, it is possible that the applicant will be seeking a variance as allowed per *HRS §196-6.5 (a) (3)*.

¹⁵ See extensive discussion here: <https://energy.hawaii.gov/resources/solar-water-heater-variance>

¹⁶ DEA Pages 191, 209, Exhibit D Page 27, and Exhibit F Page 15.

Comment 10: Local experience indicates that Kona winds will result in odor from the WWTP south/southwest of the Project. Please explain the methodology of determining that odors from the WWTP would only be a minor issue, and who made that determination.

Response 10:

Proximity to the Wastewater Treatment Plant ("WWTP")

Exhibit D and Section 4.12 Air Quality (starting on page 152) of the DEA includes an extensive discussion regarding the air quality impacts of the project area. A study by B.D. Neal & Associates, included as Exhibit D, described the methodology and findings of potential short and long term air quality impacts that could occur as a result of construction and use of the proposed development and suggested mitigation measures to reduce any potential air quality impacts where possible and appropriate. Potential impacts on the proposed development from the nearby wastewater treatment facility (aka WWTP) was also evaluated. The study utilized both national and state ambient air quality standards ("AAQS").¹⁷

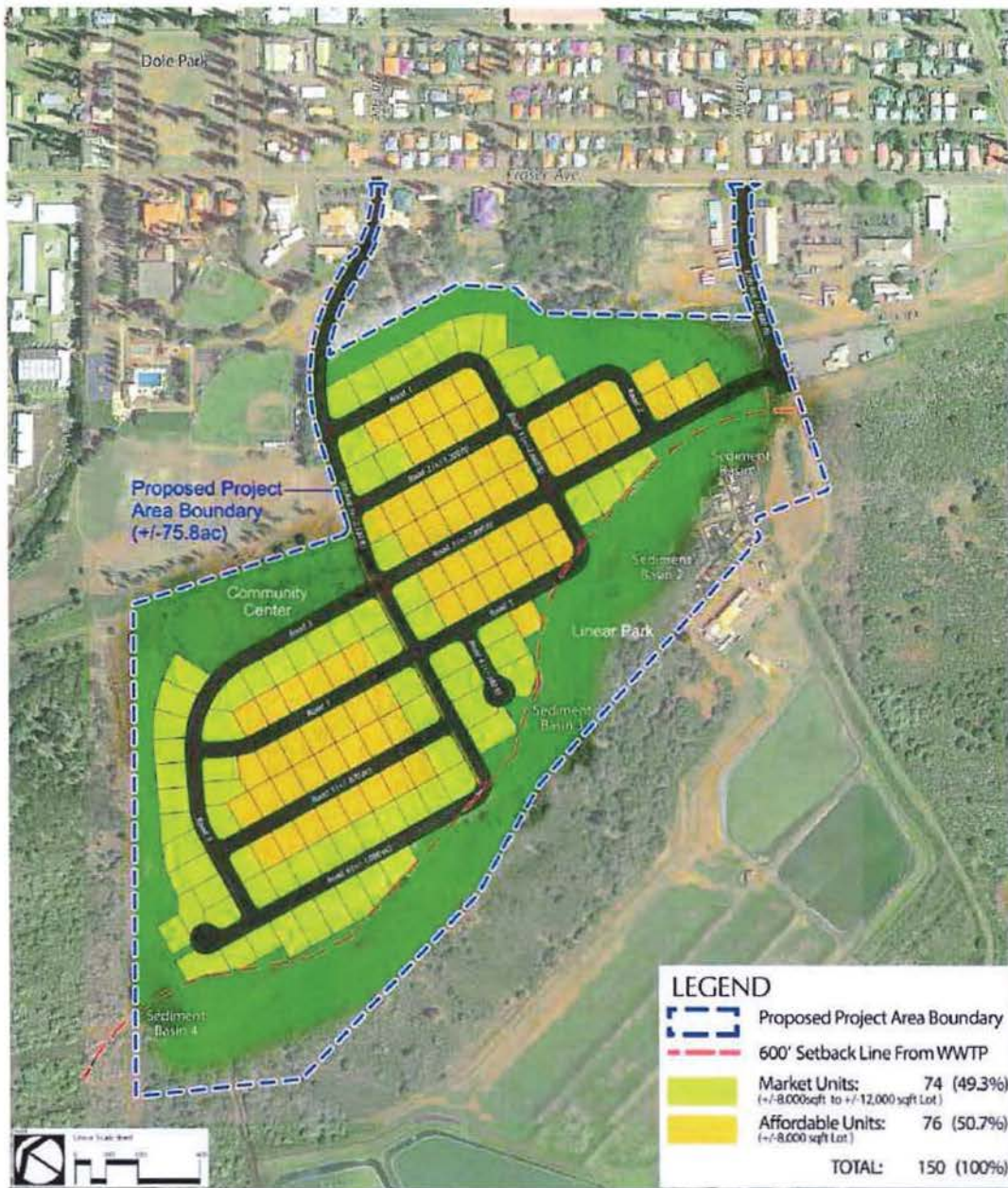
As detailed in Section 8 in Exhibit D, generally WWTPs are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds.¹⁸ It is further stated that these types and compounds in the air are generally not considered hazardous to human health, but when they occur in high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses.

A study was conducted and described in Section 8. Hydrogen sulfide measurements were collected, there were no measurable hydrogen sulfide concentrations at any location along the plant perimeter. It was recommended by the consultant that it would be prudent for the proposed project to maintain a buffer distance at least 300 to 600 feet from the WWTP boundary.¹⁹ The Hōkūāo 201H Housing Project implemented the maximum recommendation buffer of 600 feet from the WWTP boundary (see **Figure 2** below).

¹⁷ National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations, while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1 in Exhibit D summarizes the standards.

¹⁸ Exhibit D Section 8 Waste Water Treatment Plant

¹⁹ Exhibit D Section 9 Conclusions and Recommendations



Hokuao Homes 201H Housing
Conceptual Lot Plan
10/16/2020



Figure 2: Dotted red line depicts the 600 foot setback line from the WWTP.

Comment 11: Page 139 of the DEA states, "At build-out the average daily de-facto population of the community will be some 418 fulltime residents. The cumulative resident household income during the first 10 years of occupancy will total \$70.4 million and will stabilize at \$12.1 million annually thereafter." Discuss why the Applicant believes such estimates of household income are important for this project review. Is an increase in median income anticipated? If so, will that increase be driven by an increase in wages of current residents, or new residents to the island? Does the Applicant believe this new income will be generated by off-island residents moving to Lanai? If the homes are for people who are already on Lanai, does it make sense to discuss the total household income of the community when potential tenants may just be moving from another part of town to this new rental project?

Response 11:

CBRE (consultant) completed Exhibit F Market Study Economic Income Analysis for the Hōkūao 201H Housing Project. The calculations and tables presented in Exhibit F and discussed in Section 4.9 of the DEA is standard for these types of reports.

As stated in the DEA, Exhibit F, Table A-5, footnote (1): Average resident households were estimated at 150% of Lanai household income average of \$53,590 in 2020; or \$80,385 (150% * \$53,590).

When discussing this question with the consultant (CBRE), they indicated that the 150% of median income estimate is the weighted average based on the unit mix and type of workforce/affordable and market-rent homes. The household income for the workforce/affordable component is set at between 80% to 120% of median household income for Lanai (per HUD guidelines) and the market-rent units at 160% to 220% (and potentially higher). The increase is not attributed to "new residents to the island."

Comment 12: Further elaborate on water usage and provide data that shows the project's proposed water demand, plus the island's current water usage combined with the approved water allocation for entitled projects. Plot this data graphically against the threshold set by the Commission on Water Resource Management. This data should be shown in an easily read graphical format. Please state the level of approved water consumption where the need for a well on the windward side of the island will be triggered in the context of the current level of approved water consumption.

Response 12:

In Section 4.7, on page 101 of the DEA, the Lānaʻi Monthly Pumpage chart²⁰ was presented. It is replicated in **Figure 3** for convenient discussion purposes. At the time of the DEA, the current daily demand was 1.6 MGD.

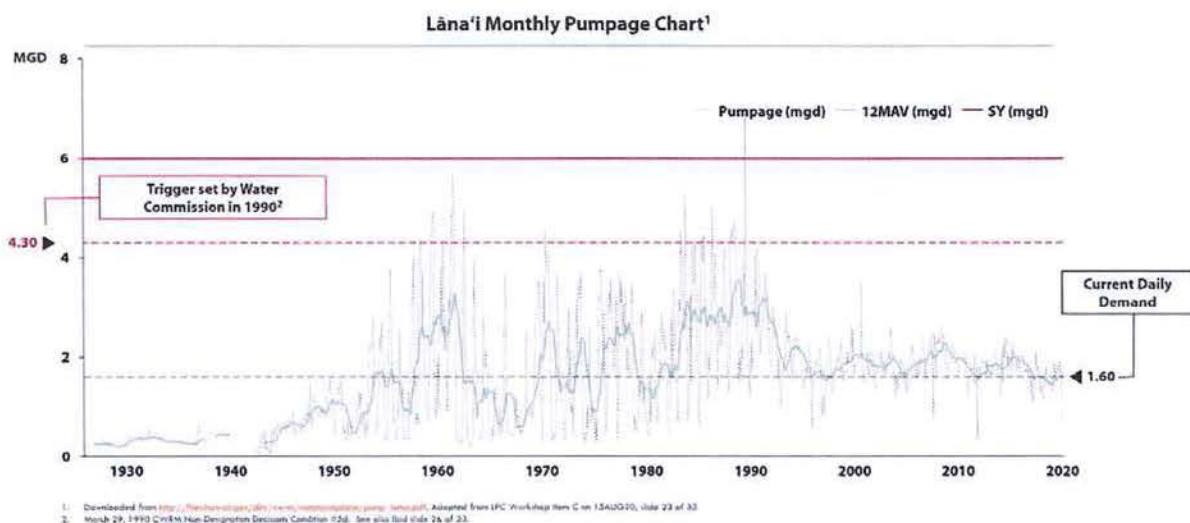


Figure 3: Duplication of chart on page 101 in the DEA. The solid light aqua blue line shows the 12-month moving average, the dotted gray line is the monthly Pumpage, the solid red line is the sustainable yield (“SY”) for Lānaʻi at 6 million gallons per day (“MGD”), and the red dotted line is pegged at 4.3 MGD, which is the trigger set by the Water Commission in 1990.

As stated on page 99 of the DEA, when the actual water use exceeds 4.3 MGD (see **Figure 3**, dotted red line trigger), the Chairperson of the Water Commission is authorized to re-institute water management-area designation proceedings and, hence re-evaluations of the ground water conditions would commence. The current daily demand in **Figure 3** is 1.6 MGD, which is 73.3% less than the sustainable yield (“SY”) and 62.8% less than the trigger set by the Water Commission. **Figure 4** was created using the information from **Figure 3** to aid in these calculations.

²⁰ The data set used to create this graphic was downloaded from https://files.hawaii.gov/dlnr/cwrm/monitoringdata/pump_lanai.pdf.

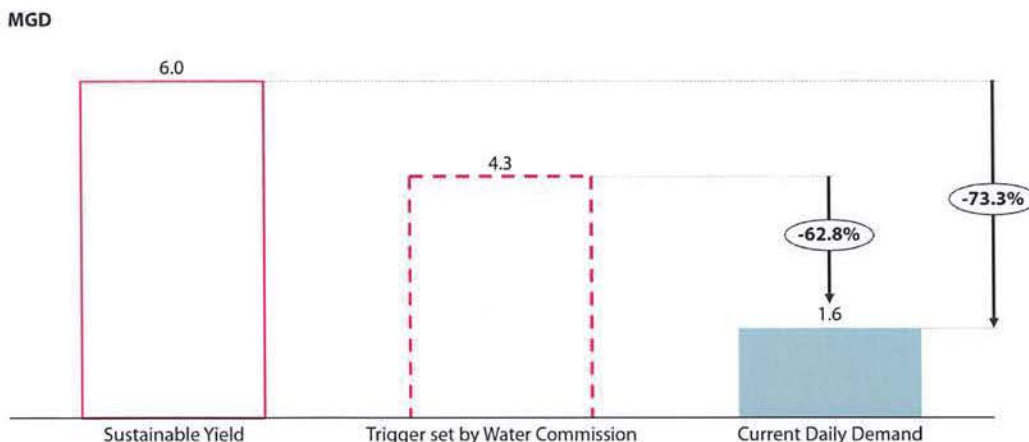


Figure 4: Graphical representation to aid in the comparison of the current water daily demand, the trigger set by the Water Commission, and the Sustainable Yield for Lānaʻi.

The preliminary engineering report ("PER") that estimated the daily water demand was conducted by RM Towill Corporation; the full PER is included as Exhibit G in the DEA. It should also be noted that the PER was conducted for 200 homes not 150 homes. Therefore, the daily water demand presented in the DEA is conservative at an estimated daily demand of 121,700 gallons per day (GPD). Actual water usage for the proposed 150 homes is anticipated to be less than the 121,700 GPD.

Utilizing an additional 121,700 GPD would not trigger the 4.3 MGD or exceed the 6 MGD SY. Further, as previously noted, the proposed project is anticipated to be less than the 121,700 GPD as the water usage was calculated for 50 more homes than planned.

Comment 13: Page 9 of the DEA states, "The project also includes a one-acre park, a 1,500 square foot community center for use by the Lanai community, and 60-parking stalls for use by the Hokuao project residents." What are these 60 parking stalls for project residents intended to be used for? Are residents allowed to park extra vehicles in these stalls? Are these stalls to be used by residents when they are using the community center? Where are non-project residents to park when they make use of the community center?

Response 13:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the parking stalls located near the community center.

The parking lot is intended to be used by community members (residents of Hōkūāo 201H Housing Project and non-residents of Hōkūāo 201H Housing Project) when visiting the community center or park.

Residents of the Hōkūāo 201H Housing Project will each have two parking stalls on their rental property as well as on-street parking available to them. On-street parking is also available for their guests.

The rental agreements and association documents have not been finalized, details regarding on-street parking will be included in the aforementioned documents and agreements.

Comment 14: Where are resident's guests to park when visiting? What provision for parking is made for residents who have more than two cars? Is there adequate off-street parking for additional cars for residents and/or visitors?

Response 14:

See response to Comment 13.

MICHAEL P. VICTORINO
Mayor

ROWENA M. DAGDAG-ANDAYA
Director

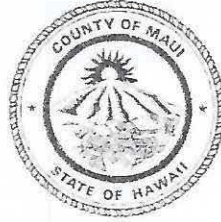
JORDAN MOLINA
Deputy Director

GLEN A. UENO, P.E., L.S.
Development Services Administration

RODRIGO "CHICO" RABARA, P.E.
Engineering Division

JOHN R. SMITH, P.E.
Highways Division

Telephone: (808) 270-7845
Fax: (808) 270-7955



COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM 434
WAILUKU, MAUI, HAWAII 96793

January 27, 2021

Mr. Buddy Almeida, Housing Administrator
COUNTY OF MAUI
Department of Housing and Human Concerns
2200 Main Street, Suite 546
Wailuku, Maui, Hawaii 96793

Dear Mr. Almeida:

**SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT REVIEW
HOKUAO 201H HOUSING PROJECT; TMK: (2) 4-9-002:061
(POR.), (2) 4-9-014:001 (POR.), AND 009 (POR.)**

We reviewed the subject application and have the following comments:

Comments from the Engineering Division:

1. Upon submittal of the construction drawings and drainage report, please ensure compliance with the following:
 - Title MC-15, Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui";
 - Title MC-15, Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices"; and
 - Title 20, Chapter 20.08, "Soil Erosion and Sedimentation Control".
2. Figure 4-4 Proposed Drainage System:

It shows 18" drainlines as some of the main lines within the subdivision. Per §15-04-06(15)(b)(1)(B), 18" diameter drainlines are only allowed for

laterals not exceeding 50 l.f. connecting drainage structures to the main line. Please ensure the drainage system is designed to comply with the rule.

3. Analyze and address the effects of point discharge at each of the proposed detention basins to downstream properties.
4. Identify adjacent drainageways in both the report and project construction plans. If applicable, include information regarding the flooded width, flow rates, and conveyance calculations.
5. The project drainage report should demonstrate that post-development discharge along the property line will not adversely affect downstream properties and conveyances. Provide analysis of pre-developed and post-developed conditions for discharge locations along the property line and the resulting effects of post-developed conditions.
6. Provide information on offsite runoff if it enters the project site. Please note that the recurrence interval is based on the drainage area and not the developed area. Review the drainage area contributing to the project site and select the criteria and design methodology accordingly.
7. Please provide the following information with the project drainage report:
 - Verification that the proposed drainage improvements are in compliance with any existing development master plans;
 - Compliance with drainage master plans;
 - Stormwater quality requirements, as applicable;
 - Flooded width calculations for roadways;
 - Hydraulic grade lines on drainline profiles;
 - Backwater calculations;
 - Sizing of drainage structures; and
 - Calculations for sizing of all drainage systems (i.e., bioretention strips, underground detention systems, and detention basin).

Mr. Buddy Almeida, Housing Administrator
January 27, 2021
Page 3

8. Include proposed typical roadway sections in the Environmental Assessment review.
9. Provide discussion on why sidewalks proposed in this project are not uniform in width.
10. Include an exhibit showing the network of sidewalks proposed in this project.

Comments from the Highways Division:

11. Highways recommends that the project incorporates the use of stormwater conveyance and drainage systems, to protect the integrity of properties, roadways and shoulders. This will minimize impact erosion of these areas.

Please call Jordan Molina at 270-7845 if you have any questions regarding this letter.

Sincerely,



FOR

ROWENA M. DAGDAG-ANDAYA
Director of Public Works

RMDA:JM:da

xc: Highways Division
Engineering Division
Peter Young, Ho'okuleana LLC
Karlynn Fukuda, Munekiyo Hiraga

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May 17, 2021

Rowena M. Dagdag-Andaya, Director
County of Maui
Department of Public Works
200 S. High Street
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Mrs. Dagdag-Andaya:

Thank for your letter dated January 27, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)
Kevin Mendes, RM Towill (w/attachment)

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* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Engineering Division

Comment 01: Upon submittal of the construction drawings and drainage report, please ensure compliance with the following:

- Title MC-15, Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui";
- Title MC-15, Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices"; and
- Title 20, Chapter 20.08, "Soil Erosion and Sedimentation Control"

Response 01:

The project will comply with all county rules for storm water management and environmental protection. The project's civil engineer will ensure that the construction drawings and drainage report(s) will illustrate such compliance under the permit process.

Comment 02: Figure 4-4 Proposed Drainage System: It shows 18" drainlines as some of the main lines within the subdivision. Per §15-04-06(15)(b)(1)(B), 18" diameter drainlines are only allowed for laterals not exceeding 50 l.f. connecting drainage structures to the main line. Please ensure the drainage system is designed to comply with the rule.

Response 02:

The referenced Figure 4-4 is schematic and intended for illustrative purposes. Your comment has been forwarded to the project's civil engineering consultant. The consultant confirmed that the drainage system design will comply with the county rules.

Comment 03: Analyze and address the effects of point discharge at each of the proposed detention basins to downstream properties.

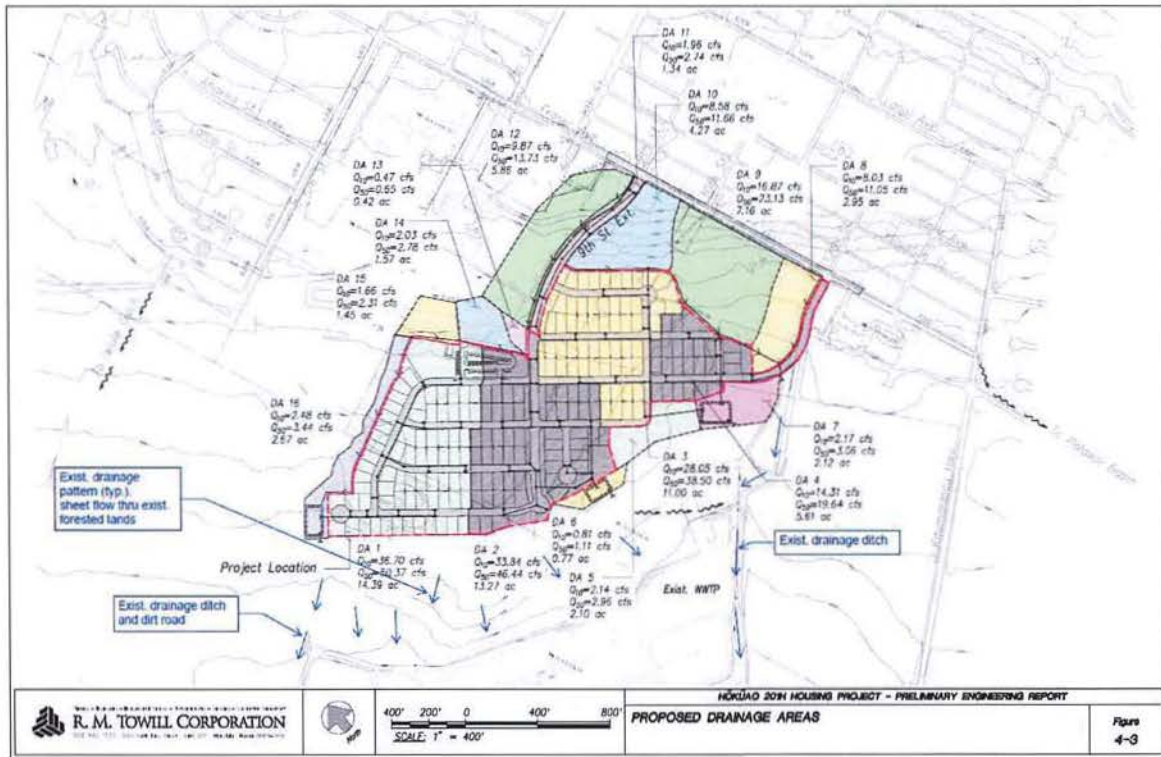
Response 03:

The project's civil engineer noted that the intent is to design each of the detention basins and peripheral park spaces to mitigate storm water runoff impacts to downstream properties due to the development. During the design phase of the project, the construction plans and drainage study will address point discharges from the basins and ensure the intent is met.

Comment 04: Identify adjacent drainageways in both the report and project construction plans. If applicable, include information regarding the flooded width, flow rates, and conveyance calculations.

Response 04:

During the design phase of the project, the project's civil engineer will prepare construction plans and a drainage study which will address existing and proposed storm flow characteristics downstream of the project site. Below, the Applicant has included notes to the Draft Environmental Assessment (DEA) Exhibit G, Figure 4-3 with added comments (in blue) for clarification of the existing drainage patterns, which will be maintained.



Comment 05: The project drainage report should demonstrate that post-development discharge along the property line will not adversely affect downstream properties and conveyances. Provide analysis of pre-developed and post-developed conditions for discharge locations along the property line and the resulting effects of post-developed conditions.

Response 05:

During the design phase of the project, the project's civil engineer confirmed that the drainage study will demonstrate that post-development discharges will not adversely impact downstream properties and conveyances or otherwise propose improvements to mitigate impacts.

Comment 06: Provide information on offsite runoff if it enters the project site. Please note that the recurrence interval is based on the drainage area and not the developed area. Review the drainage area contributing to the project site and select the criteria and design methodology accordingly.

Response 06:

Fraser Avenue is improved with curbs and intercepts the majority of offsite tributary areas, as Exhibit G, Preliminary Engineering Report (prepared by RM Towill Corporation) Section 2.7 and Figures 2-8 and 2-9 suggests in the DEA. However, during the design phase of the project, a detailed study will be conducted and offsite runoff will be addressed in the drainage report. The project may include onsite diversion or conveyance facilities where necessary, in accordance with the county's drainage rules.

Comment 07: Please provide the following information with the project drainage report:

- Verification that the proposed drainage improvements are in compliance with any existing development master plans;
- Compliance with drainage master plans;
- Stormwater quality requirements, as applicable;
- Flooded width calculations for roadways;
- Hydraulic grade lines on drainline profiles;
- Backwater calculations;
- Sizing of drainage structures; and
- Calculations for sizing of all drainage systems (i.e., bioretention strips, underground detention systems, and detention basin).

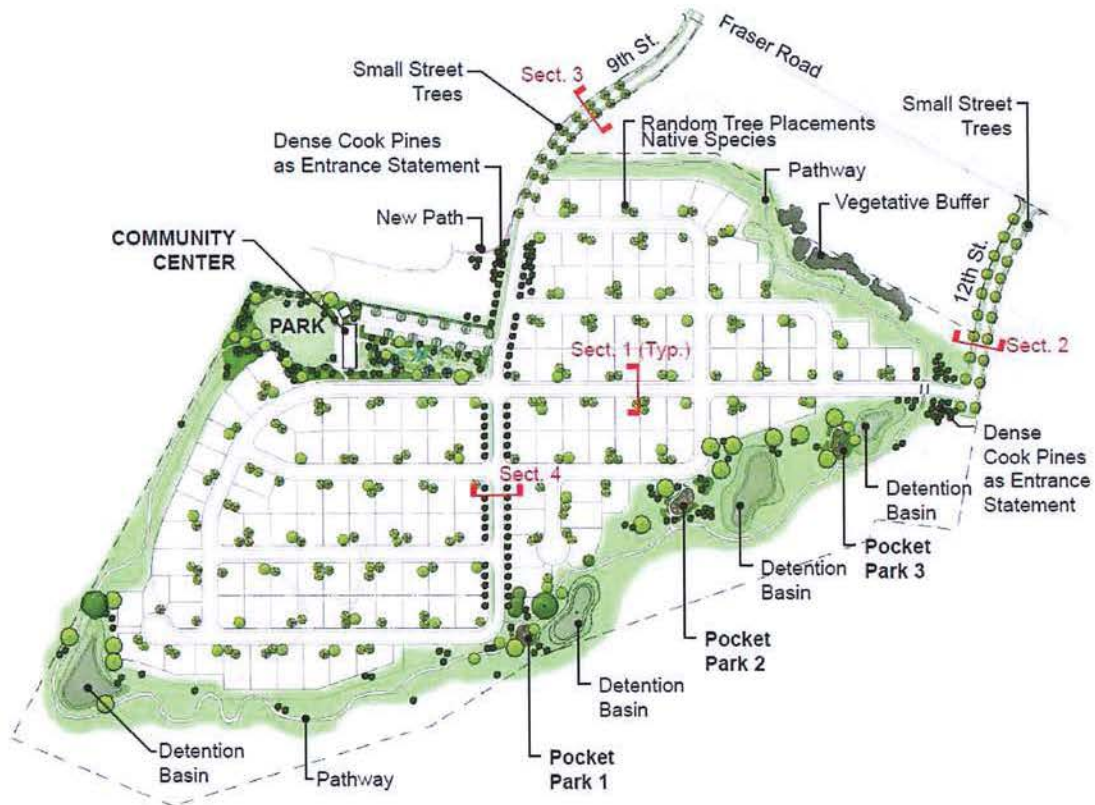
Response 07:

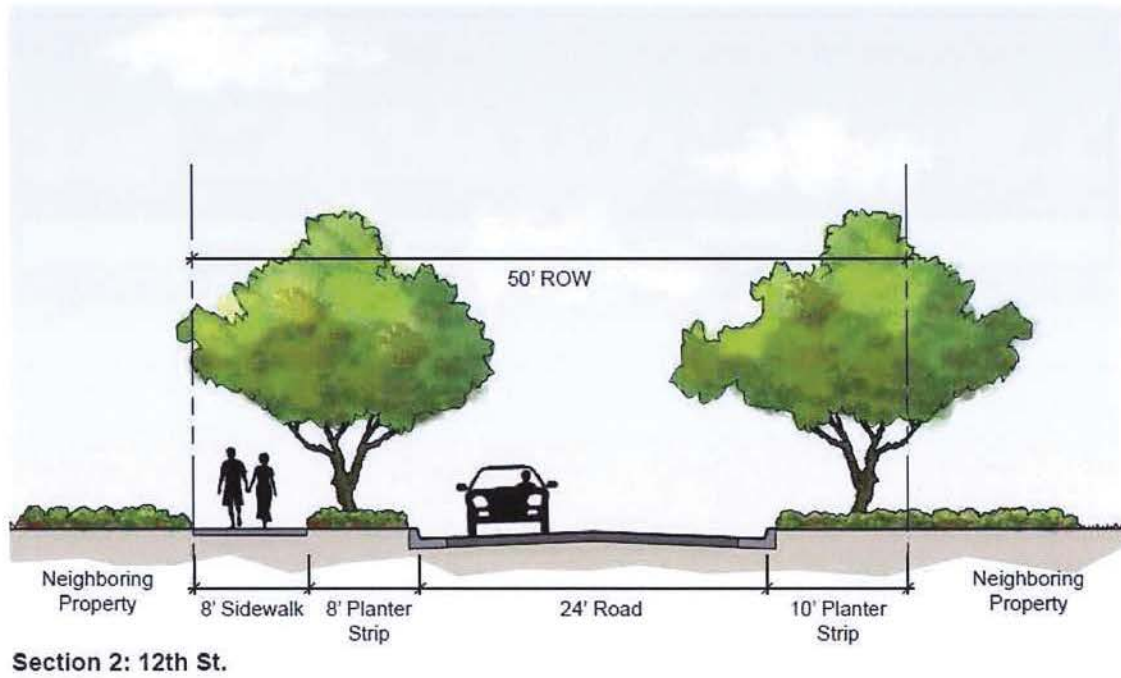
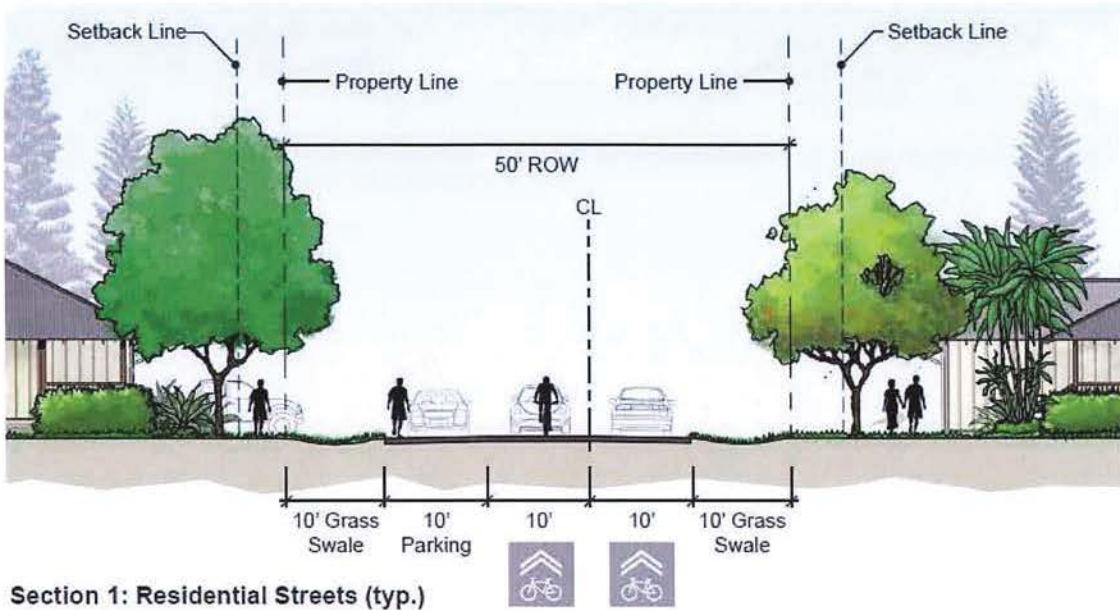
The requested information is noted and will be provided with the permit application(s) in the project's drainage report.

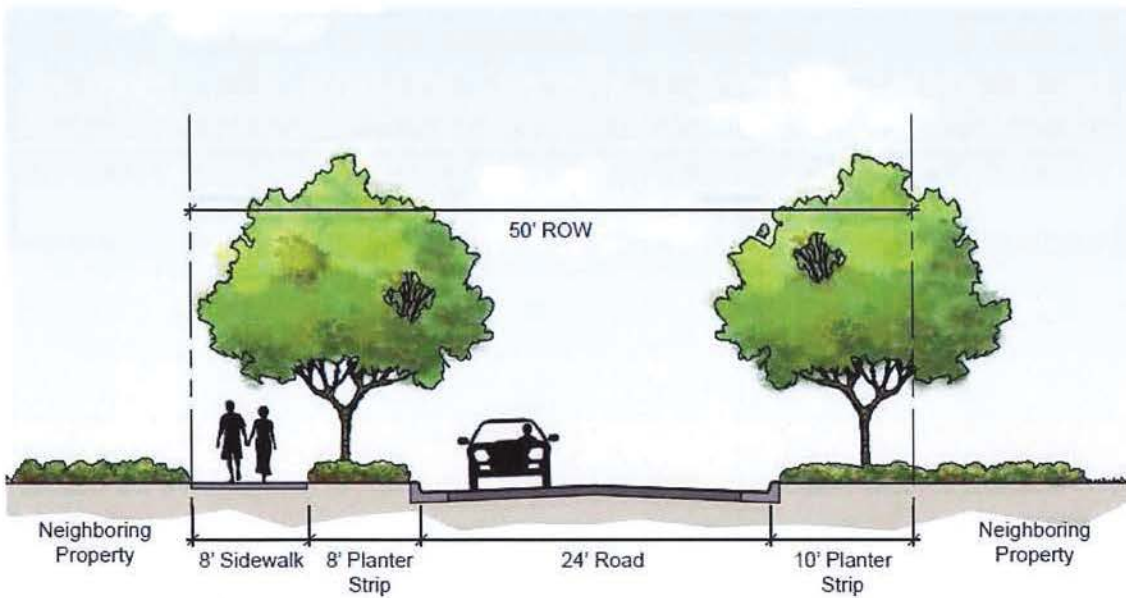
Comment 08: Include proposed typical roadway sections in the Environmental Assessment review

Response 08:

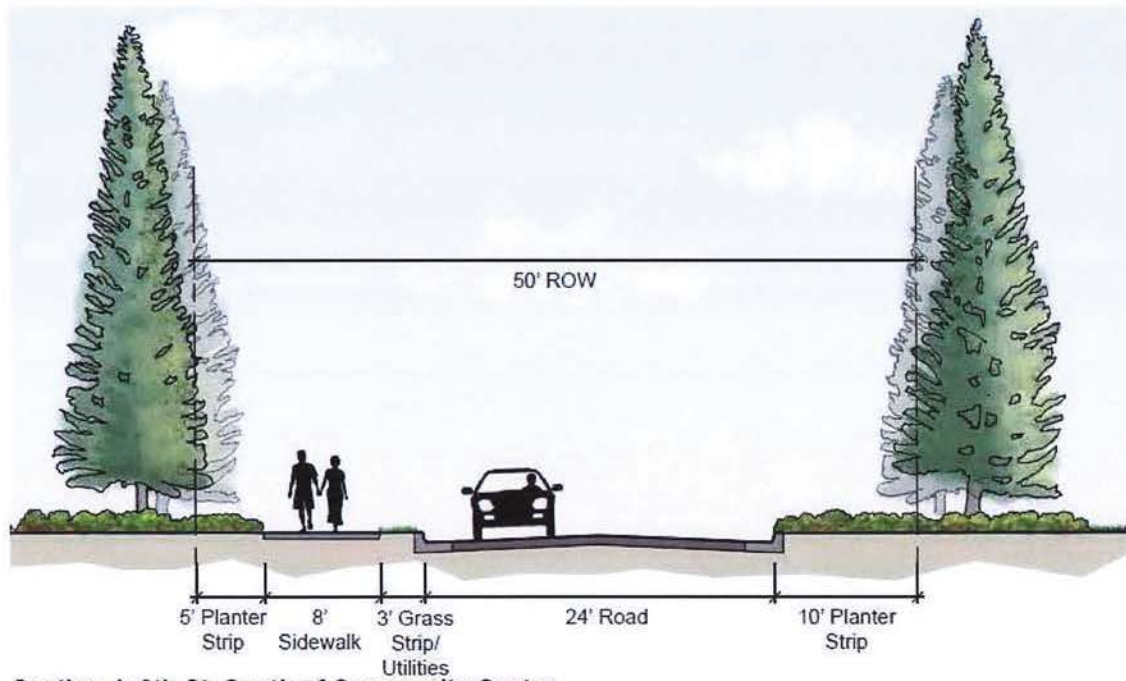
The graphic below is located on page 28 of the DEA. We've indicated typical roadway sections (Sect. #) in red in the graphic. The subsequent conceptual graphics provide a close-up view of those sections.







Section 3: 9th St. North of Community Center



Section 4: 9th St. South of Community Center

Comment 09: Provide discussion on why sidewalks proposed in this project are not uniform in width.

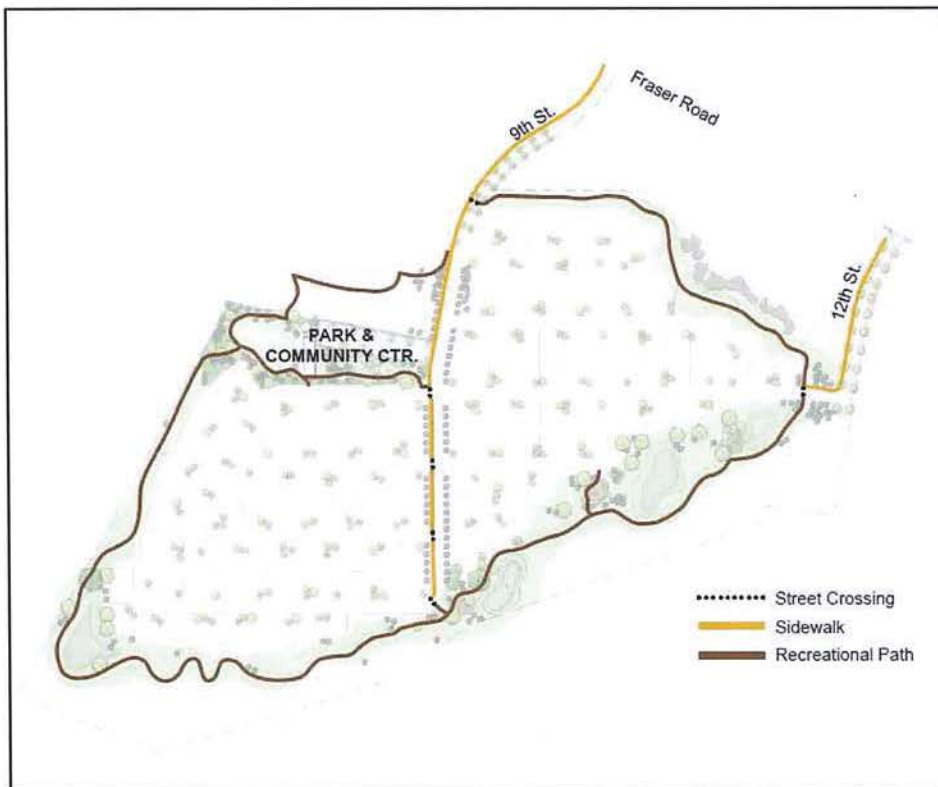
Response 09:

A uniform 8-foot wide sidewalk is proposed along the north shoulder of both 9th Street and 12th Street. Due to constrictions from adjacent parcels within 250 feet of Fraser Avenue, the existing 9th Street Right of Way (ROW) varies in width between 40-feet, 48-feet and 56-feet. Therefore, the proposed 9th Street sidewalk width may vary within this 250-foot length of roadway.

Comment 10: Include an exhibit showing the network of sidewalks proposed in this project.

Response 10:

The graphic below is the same graphic from Response 8, however, the network of sidewalks are highlighted as indicated in the legend. The rust colored line is the recreation path, mustard colored line is the sidewalks, and the dotted line is the street crossing.



Highways Division

Comment 11: Highways recommends that the project incorporates the use of stormwater conveyance and drainage systems, to protect the integrity of properties, roadways and shoulders. This will minimize impact erosion of these areas.

Response 11:

The applicant acknowledges the comment and will incorporate such systems into the design.

JAN - 8 2021

MICHAEL P. VICTORINO
Mayor

MARC I. TAKAMORI
Director

MICHAEL B. DU PONT
Deputy Director



DEPARTMENT OF TRANSPORTATION
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793
TELEPHONE: (808) 270-7511
FAX: (808) 270-7505

December 31, 2020

Buddy Almeida, Housing Administrator
County of Maui, Housing Division
2065 Main Street, Suite 108
Wailuku, HI 96793

SUBJECT: Proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi

Dear Mr. Almeida,

Thank you for the opportunity to review and comment on this project. At this time, we do not have any comments.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Takamori", is located below the word "Sincerely,".

Marc Takamori
Director

cc: Peter Young, Ho'okuleana LLC
Karlynn Fukuda, Munekiyo Hiraga

May 17, 2021

Marc Takamori, Director
County of Maui
Department of Transportation
Maui County Service Center
110 Ala'ihi Street, Suite 210
Kahului, Hawai'i 96732

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Takamori:

Thank for your letter dated December 31, 2020, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we acknowledge that the Department of Transportation has no comments to offer at this time as the proposed project does not impact any of the Department of Transportation projects or existing facilities.

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

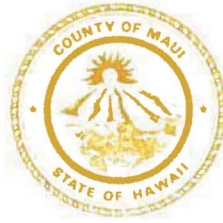
Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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MICHAEL P. VICTORINO
Mayor

JEFFREY T. PEARSON, P.E.
Director

HELENE KAU
Deputy Director



DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.mauicounty.gov/water

February 9, 2021

Buddy Almeida, Housing Administrator
County of Maui, Housing Division
2065 Main Street, Suite 108
Wailuku, Hawaii 96793

Dear Mr. Almeida:

RE: Hōkūao 201H Housing Project Draft Environmental Assessment (DEA)
TMK: (2) 4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna`i City, Hawai`i

The County of Maui Department of Water Supply (MDWS) thanks you for the opportunity to offer the following comments on the Hōkūao 201H Housing Project DEA.

Source

According to the Commission on Water Resource Management (CWRM), Lāna`i has a sustainable yield (SY) of 6 million gallons per day (MGD). Fresh water is found solely in the high-level Central Aquifer Sector. The entire Island of Lāna`i is served by the Lāna`i Water Company (LWC), a private water utility company regulated by the Public Utilities Commission.

Consumption

The Applicant states that the project's average daily water demand is estimated to be below the 121,700 gallons per day (gpd) stated in the Preliminary Engineering Report (PER). This figure was based on Water System Standards, 2002, State of Hawai`i for Maui County, using the formerly proposed 200 Single-Family (SF) units at 600 gpd and a one acre park, with a projected demand of 1,700 gpd. The current project proposes 150 SF units, 50 SF units less than when the PER calculated the 121,700 gpd water demand.

Lāna`i Water Use and Development Plan, 2011 (Lāna`i WUDP)

The Hōkūao Project components that appear to be within the guidelines set forth in the Lāna`i WUDP, 2011 are listed in the table that follows.

"By Water All Things Find Life"

Hökūāo 201H Housing Project DEA Elements within Lāna`i WUDP, 2011 Guidelines

Provision Type/Strategy Lāna`i WUDP, 2011	Provision Type/Strategy Goal/Objective Lāna`i WUDP, 2011 (Page #)	Hökūāo 201H Housing Project Strategy Implementation of Lāna`i WUDP, 2011 (Page #)
Conservation-- wastewater recycling/reuse	Implement water recycling and conservation programs targeting landscaping/irrigation (30)	All project wastewater will be reclaimed (125, 209)
Conservation-- education/supporting measures	Education and supporting measures to encourage planting of low-water-use plants for new landscaping (30)	The LWC promotes conservation messages on its website, in public meetings and is developing and implementing a conservation program. (125)
Conservation--use of low-water-use plants	The County and public utilities should implement education and supporting measures to encourage planting of low-water-use plants for new and existing landscaping (30)	Use of native species and drought-tolerant plants requiring less irrigation (125, 209) The LWC promotes conservation ads in the monthly newspaper, has several roadside irrigation xeriscaping projects and is working to reduce water use and best practice uses for customers. (126)
Conservation--indoor use	Water conservation targeting indoor uses, efficient use to reduce waste (30)	Low-flow fixtures will be utilized (125, 209) Smart meters will be utilized and they will provide notifications if there appears to be a leak (125)
Conservation--reduce "Unaccounted for" water leaks	Replacement of deteriorated Pālāwai grid pipeline (30)	The LWC has replaced the entire section from Hi`i to Miki pipeline with new PVC pipe (126)
	Replace &/or repair deteriorating or leaking supply pipes (30)	The LWC has budgeted amounts for future years to replace sections of pipe each year (126)
	Implement programmatic leak detection/repair programs (30)	The LWC has an "unaccounted for" water program to find unmetered water and leaks (126) Pālāwai Ag System installed a pressure reducing valve station, reducing leaks significantly (126)
Conservation--reduce "Unaccounted for" water losses	The WUDP Island-wide Projections for 2030 calls for a "reasonable" goal of 15% and a "better" goal of 12% for unaccounted for water on the island between pumping and billing (Figure 1-9, (13))	The LWC has reduced the overall "unaccounted for" water on the island between pumping and billing to approximately 15% presently (126)
	Install floating or Hypalon ball type cover on existing 15MG brackish water reservoir (30)	This option is presently being assessed against the "blanket" type cover (126)
	Install blanket type cover on existing 15MG brackish water reservoir (page 30)	The LWC conducted a test of a Monolayer technology to inhibit water evaporation but was not as effective as hoped for (126)
Alternative Water Resources--non-potable irrigation, brackish well water use, desalination, new wells	"A 2009 CCR proposal included projects...which...1.209 MGD was to be met by reclaimed water" (12)	The new onsite wastewater system will collect wastewater generated by the new homes and will include the future park, pavilion and parking stalls and constructed within the new roads (128)
	"A 2009 CCR proposal included projects...which 0.834 MGD was to be met by pumping...brackish water 'alternative' sources" (12)	Pūlama Lāna`i developed a non-potable water system for irrigation purposes that utilizes brackish well water (127)
	New Brackish Well 15 in the Leeward Aquifer: Used with/without additional desalinization (14)	New Brackish Well 15 in the Leeward Aquifer: Used without and without additional desalinization (114, 121)
	Desalination offers unlimited source capacity (Chapter 5, Supply Options, page 5-38)	Pūlama Lāna`i, said that LWC had not given up on developing a desalination plant, and the company had substantial investment (122, 125)
Watershed Protection	Development of a new publicly reviewed and supported comprehensive watershed protection plan incorporating the watershed protection provisions identified in Chapter 6 of the Supporting Documentation (29)	Pūlama Lāna`i submitted a report to LWAC on fencing/hunting issues. In 2018, Pūlama Watershed Report was submitted to DLNR DOFAW. A 2019 island-wide Natural Resources Management Plan is expected (99)

Construction Best Management Practices for Pollution Prevention

To protect ground and surface water resources as well as our coastal areas, we recommend that in addition to any required Best Management Practices (BMPs) the following measures be implemented during construction:

- Prevent cement products, oil, fuel and other toxic substances from falling or leaching into the ground. Remove all construction debris and toxic substances daily to prevent entry into the ocean.
- Maintain vehicles and equipment to prevent oil or other fluids from leaking. Concrete trucks and tools used for construction should be rinsed off-site.
- Properly install and maintain erosion control barriers such as silt fencing or straw bales.
- Disturb the smallest area possible.
- Retain ground cover until the last possible date. Stabilize denuded areas by sodding or planting as soon as possible. Use high seeding rates to ensure rapid stand establishment. Apply biocides only during dry periods of low rainfall to minimize chemical run-off.
- Keep run-off on site.
- Dust control: Reclaimed water for dust control is available from the Wastewater Treatment plant at a reasonable cost. If feasible, it should be considered as an alternative source of water for dust control during construction.

Conservation BMPs - Indoor

DWS recommends the following indoor conservation measures be implemented:

- Use EPA WaterSense labeled plumbing fixtures.
- Install flow reducers and faucet aerators in all plumbing fixtures wherever possible.
- Install dual flush toilets with high efficiency models that use 1.28 gallons per flush or less.
- Install showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 pounds per square inch (psi).
- Install bathroom sink faucets with fixtures that do not exceed 1 gpm at 60 psi.
- Laundry facilities and/or individual unit machines should use Energy Star labeled washers.

Outdoor

DWS recommends the following outdoor conservation measures be implemented:

- Use Smart Approved WaterMark irrigation products. Examples include evapotranspiration irrigation controllers, drip irrigation, and water saving spray heads.
- After plants are established, avoid fertilizing and pruning to stimulate excessive growth. Time watering to occur in the early morning or evening to limit evaporation. Limit turf to as small an area as possible.
- We are pleased to note the use of native climate-adapted plants for landscaping. The DEA states that native plants adapted to the area conserve water. Native plants also protect the watershed from degradation due to invasive alien species.
- We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawai'i at https://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf

We hope you find this information useful. Should you have any questions, please contact staff planner Alex Buttarro at (808) 463-3103 or alex.buttaro@mauicounty.gov.

Sincerely,



Jeffrey T Pearson, P.E.

Director

BAB

cc: MDWS Engineering, Peter Young, Ho'okuleana LLC, Karylynn Fukuda, Munekiyo Hiraga

File location S:\PLANNING\Permit_Review\Projects Review\planning review\EA-EIS\Hökūao 201H Housing DEA Letter

May 17, 2021

Jeffrey T. Pearson, P.E., Director
County of Maui
Department of Water Supply
200 South High Street
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Mr. Pearson:

Thank for your letter dated February 09, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)
Kevin Mendes, RM Towill (w/attachment)
Michael Garris, Belt Collins Hawai'i (w/attachment)

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* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Pūlama Lānaʻi recognizes the Maui County Department of Water Supply ("DWS") letter dated February 9, 2021 on the Hōkūao 201H Housing Project Draft Environmental Assessment ("DEA").

We note that DWS confirmed in the table on page two of the letter, that the components of the Hōkūao 201H Housing Project appear within the guidelines set forth in the Lānaʻi Water Use and Development Plan ("LWUDP").

Comment 01: We recommend that in addition to any required Best Management Practices (BMPs) the following measures be implemented during construction:

- Prevent cement products, oil, fuel and other toxic substances from falling or leaching into the ground. Remove all construction debris and toxic substances daily to prevent entry into the ocean.
- Maintain vehicles and equipment to prevent oil or other fluids from leaking. Concrete trucks and tools used for construction should be rinsed off-site.
- Properly install and maintain erosion control barriers such as silt fencing or straw bales.
- Disturb the smallest area possible.
- Retain ground cover until the last possible date. Stabilize denuded areas by sodding or planting as soon as possible. Use high seeding rates to ensure rapid stand establishment. Apply biocides only during dry periods of low rainfall to minimize chemical run-off.
- Keep run-off on site.
- Dust control: Reclaimed water for dust control is available from the Wastewater Treatment plant at a reasonable cost. If feasible, it should be considered as an alternative source of water for dust control during construction.

Response 01:

The Applicant will incorporate required BMPs during construction. To the extent possible, the Applicant will comply with the recommended listed BMPs listed above.

Comment 02: DWS recommends the following indoor conservation measures be implemented:

- Use EPA WaterSense labeled plumbing fixtures.
- Install flow reducers and faucet aerators in all plumbing fixtures wherever possible.
- Install dual flush toilets with high efficiency models that use 1.28 gallons per flush or less.
- Install showerheads with a flow rate of 1.5 gallons per minute (gpm) at 60 pounds per square inch (psi).
- Install bathroom sink faucets with fixtures that do not exceed 1 gpm at 60 psi.
- Laundry facilities and/or individual unit machines should use Energy Star labeled washers.

Response 02:

The project will comply with all applicable State and County rules related to conservation measures.

To the extent possible, the Applicant will incorporate water efficient fixtures and water efficient practices throughout the development. Lānaʻi Water Company was the first water utility in the state to deploy 100% smart meters to its customers. All meters in the Hōkūao 201H Housing Project will have a smart water meter.

Comment 03: DWS recommends the following outdoor conservation measures be implemented:

- Use Smart Approved WaterMark irrigation products. Examples include evapotranspiration irrigation controllers, drip irrigation, and water saving spray heads.
- After plants are established, avoid fertilizing and pruning to stimulate excessive growth. Time watering to occur in the early morning or evening to limit evaporation. Limit turf to as small an area as possible.
- We are pleased to note the use of native climate-adapted plants for landscaping. The DEA states that native plants adapted to the area conserve water. Native plants also protect the watershed from degradation due to invasive alien species.
- We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawai'i at [https://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH Irrigation Conservation BMPs.pdf](https://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf)

Response 03:

On pages 125 to 127 of the Draft Environmental Assessment ("DEA"), there is a discussion on various water conservation measures that will be incorporated in the project.

To the extent possible, the Applicant will incorporate irrigation conservation best management practices throughout the development.

Council Chair
Alice L. Lee

Vice-Chair
Keani N.W. Rawlins-Fernandez

Presiding Officer Pro Tempore
Tasha Kama

Councilmembers
Gabe Johnson
Kelly Takaya King
Michael J. Molina
Tamara Paltin
Shane M. Sinenci
Yuki Lei K. Sugimura



Director of Council Services
Traci N. T. Fujita, Esq.

COUNTY COUNCIL
COUNTY OF MAUI
200 S. HIGH STREET
WAILUKU, MAUI, HAWAII 96793
www.MauiCounty.us

January 22, 2021

Director Ms. Lori Tsuhako
County of Maui
Department of Housing and Human Concerns
2200 Main Street, Suite 546
Wailuku, HI 96793

Dear Ms. Tsuhako:

SUBJECT: COMMENTS ON THE DRAFT EA FOR THE HŌKŪAO
AFFORDABLE HOUSING PROJECT

Please find below my comments on the draft EA for the Hōkūao affordable housing project. These comments are a combination of the concerns of Lānaʻi residents collected through outreach and my own.

Points contained in this letter address possible significant effects on the environment caused by this project according to the criteria outlined in the Hawaiʻi Environmental Policy.

Irrevocably commit a natural, cultural, or historic resource

There are wide concerns that the sheer scope of the project will impact the socio-cultural fabric of Lānaʻi. Half of the units will be market price. There are concerns that those units will attract, and possibly only be cost-accessible to, renters who do not currently live on Lānaʻi. While affordable workforce units are sorely needed on Lānaʻi, granting exemptions to and allowing the building of 74 market price units, in order to facilitate the development of 76 affordable units, runs the risk of permanently changing the make-up of Lānaʻi's population. We have genuine concerns that the market rate units will be attractive to people who will work remotely from Lānaʻi, who likely make far more than the average current Lānaʻi resident, and who may end up driving up Lānaʻi's Area Median

Income. This scenario would have detrimental long term effects on the cost of housing on Lāna‘i, as HUD recommendations reflect these increases.

Additionally, due to the proximity of the open ponds of the sewer plant, there will be potential damages to the native bird population that visit the sewer plant ponds. Specifically, the Hawaiian Stilt, (ae‘o), the Hawaiian Coot (‘alae kea) and the Hawaiian horey bat (ope‘ape‘a) are all known to visit and reside at the sewer ponds.

Have a substantial adverse effect on public health

A large number of Lāna‘i residents have expressed concern over the proximity of this project to the sewage treatment facility. On days when there are no trade winds, many residents report a strong odor wafting out of the facility and into where Hōkūao is planned to be built. In some cases, that odor is enough to make one’s eyes water. The draft EA touched on air quality issues and expects a FONSI, but many residents wonder if any investigation on air quality from the sewage treatment facility was done on days absent of trade winds. The EA mentions of 3 specific areas are of major concern for residents: the 55 gallon diesel drum that was found, the old pesticide shed, and the old power plant. All three areas had to be excavated. Many are concerned that the excavation didn’t go deep enough and there still may be remnant chemicals that are unsafe to the community.

Involve adverse secondary impacts, such as population changes or effects on public facilities

I must reiterate the numerous concerns I received from Lāna‘i residents about the high number of market rate units. It is not in our community’s best interest to approve housing that will bring in remote workers from off-island and increasing the population of Lāna‘i. Considering the very public vision of Larry Ellison that Lāna‘i be an oasis for remote workers from locations all over the world, residents are concerned of their place in this vision.

At the very least, we must insert a requirement that in order to qualify for an affordable unit, one member of the household must work on the island of Lāna‘i for a total of 30 hours a week or more.

The majority of questions I received from Lāna‘i residents were asking how many of the units would be leased to off-island/new residents. We must address this

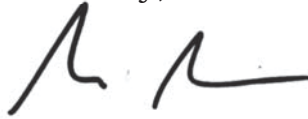
January 22, 2021
Page 3

concern, especially considering the large number of market rate units relative to the total number of existing units on Lānaʻi.

Many of our residents are upset that the units are for rent and not for sale. Presently, we have at least 2 low income apartments for rent, Iwiolo Hale, and the Courts. There is huge demand on the island for truly affordable homes for sale. This project does not address this fact.

Thank you for your consideration of my comments on the draft EA for the Hōkūao affordable housing project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gabe Johnson', with a stylized, cursive script.

GABE JOHNSON
Committe Chair, Affordable Housing

May 17, 2021

Gabe Johnson, Committee Chair, Affordable Housing
County of Maui
County Council
200 S. High Street
Wailuku, Hawai'i 96793

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Mr. Johnson:

Thank for your letter dated January 22, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
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* In accordance with Hawai'i Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: There are wide concerns that the sheer scope of the project will impact the socio-cultural fabric of Lānaʻi. Half of the units will be market price. There are concerns that those units will attract, and possibly only be cost-accessible to, renters who do not currently live on Lānaʻi. While affordable workforce units are sorely needed on Lānaʻi, granting exemptions to and allowing the building of 74 market price units, in order to facilitate the development of 76 affordable units, runs the risk of permanently changing the make-up of Lānaʻi's population. We have genuine concerns that the market rate units will be attractive to people who will work remotely from Lānaʻi, who likely make far more than the average current Lānaʻi resident, and who may end up driving up Lānaʻi's Area Median Income. This scenario would have detrimental long term effects on the cost of housing on Lānaʻi, as HUD recommendations reflect these increases.

Response 01:

In the DEA, there are multiple references to workforce housing.¹ The homes will be provided to the workforce on Lānaʻi, which will include employees of Pūlama Lānaʻi and affiliate companies and other entities that are necessary to maintain essential operations on Lānaʻi (e.g., teachers, police officers, TSA agents, nurses, etc.).

Comment 02: Additionally, due to the proximity of the open ponds of the sewer plant, there will be potential damages to the native bird population that visit the sewer plant ponds. Specifically, the Hawaiian Stilt (ae'o), the Hawaiian Coot ('ālae kea) and the Hawaiian horey bat (ope'ape'a) (*sic*) are all known to visit and reside at the sewer ponds.

Response 02:

The applicant engaged consultants and experts with applicable certifications and professional degrees to conduct the studies included in the Draft EA ("DEA"). As stated on page 67 of the DEA, taken from Page 12 of Exhibit C, Terrestrial Vegetation and Wildlife Surveys for Hōkūāo 201H Housing Project, maintenance of a 600-foot buffer from the existing sewage treatment ponds should be sufficient to prevent disturbance of listed endangered Hawaiian stilt and coot and should not interfere with seasonal foraging by migratory shorebirds and waterfowl at the ponds. Additional fencing associated with the Hōkūāo 201H Housing Project will help deter disturbance of the water birds at the sewage ponds by humans and house pets.

Comment 03: A large number of Lānaʻi residents have expressed concern over the proximity of this project to the sewage treatment facility. On days when there are no trade winds, many residents report a strong odor wafting out of the facility and into where Hōkūāo is planned to be built. In some cases, that odor is enough to make one's eyes water. The draft EA touched on air quality issues and expects a FONSI, but many residents wonder if any investigation on air quality from the sewage treatment facility was done on days absent of trade winds.

Response 03:

The applicant engaged consultants and experts with applicable certifications and professional degrees to conduct the studies included in the Draft EA ("DEA").

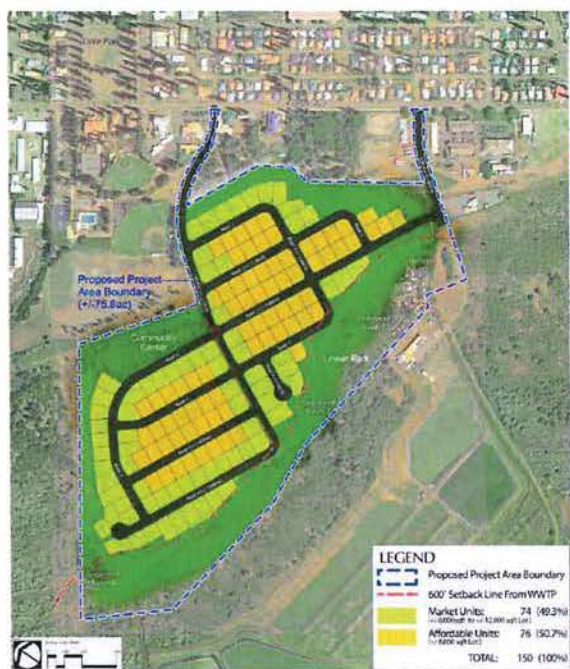
¹ DEA pages 133, 137-139, and Exhibit F.

Proximity to the Wastewater Treatment Plant (“WWTP”)

Exhibit D and Section 4.13 Air Quality (starting on page 152) of the Draft Environmental Assessment (“DEA”) includes an extensive discussion regarding the air quality impacts of the project area. A study by B.D. Neal & Associates, included as Exhibit D, described the methodology and findings of potential short and long term air quality impacts that could occur as a result of construction and use of the proposed development and suggested mitigation measures to reduce any potential air quality impacts where possible and appropriate. Potential impacts on the proposed development from the nearby wastewater treatment facility (aka WWTP) was also evaluated. The study utilized both national and state ambient air quality standards (“AAQS”).²

As detailed in Section 8 in Exhibit D, generally WWTPs are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds.³ It is further stated that these types and compounds in the air are generally not considered hazardous to human health, but when they occur in high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses.

A study was conducted and described in Section 8. Hydrogen sulfide measurements were collected, there were no measurable hydrogen sulfide concentrations at any location along the plant perimeter. It was recommended by the consultant that it would be prudent for the proposed project to maintain a buffer distance at least 300 to 600 feet from the WWTP boundary.⁴ The Hōkūāo 201H Housing Project implemented the maximum recommendation buffer of 600 feet from the WWTP boundary (see **Figure 1**).



Hokuao Homes 201H Housing
Conceptual Lot Plan
10/16/2020



Figure 1: Dotted red line depicts the 600 foot setback line from the WWTP.

² National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations, while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1 in Exhibit D summarizes the standards.
³ Exhibit D Section 8 Waste Water Treatment Plant
⁴ Exhibit D Section 9 Conclusions and Recommendations

Comment 04: The EA mentions of 3 specific areas are of major concern for residents: the 55 gallon diesel drum that was found, the old pesticide shed, and the old power plant. All three areas had to be excavated. Many are concerned that the excavation didn't go deep enough and there still may be remnant chemicals that are unsafe to the community.

Response 04:

The applicant engaged consultants and experts with applicable certifications and professional degrees to conduct the studies included in the Draft EA ("DEA"). TRC completed the assessment and mitigation recommendations discussed extensively in section 4.4 starting on page 72.

As stated on page 79 of the DEA, construction activities on the proposed project will not commence until the Removal Action Completion Report is accepted and approved, and the Hawaii Department of Health or other applicable regulatory authority has issued a No Further Action (NFA) letter or similar closure document.

Comment 05: I must reiterate the numerous concerns I received from Lāna'i residents about the high number of market rate units. It is not in our community's best interest to approve housing that will bring in remote workers from off-island and increasing the population of Lāna'i. Considering the very public vision of Larry Ellison that Lāna'i be an oasis for remote workers from locations all over the world, residents are concerned of their place in this vision.

At the very least, we must insert a requirement that in order to qualify for an affordable unit, one member of the household must work on the island of Lāna'i for a total of 30 hours a week or more.

The majority of questions I received from Lāna'i residents were asking how many of the units would be leased to off-island/new residents. We must address this concern, especially considering the large number of market rate units relative to the total number of existing units on Lāna'i.

Response 05:

See response to Comment 01.

Comment 06: Many of our residents are upset that the units are for rent and not for sale. Presently, we have at least 2 low income apartments for rent, Iwiolo Hale, and the Courts. There is huge demand on the island for truly affordable homes for sale. This project does not address this fact.

Response 06:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment of home ownership. Several community meetings⁵ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūāo 201H Housing Project over the last five years. The applicant has evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions,⁶ in the

⁵ Pūlama Lāna'i Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

⁶ Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'i.

design and offering for the Hōkūāo 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

Affordable housing is needed on Lāna'i, this topic has been discussed at numerous venues for over several decades. The Hōkūāo 201H Housing Project is a complement to other residential housing projects, such as the proposed Lāna'i City Maui County Affordable Housing Project ("County Project")^{7 8 9 10} and the future residential development for the State of Hawai'i Department of Hawaiian Home Lands ("DHHL").

According to news reports,¹¹ the infrastructure installation costs impeded the progress of the County Project (e.g., land locked and far from current infrastructure). The Hōkūāo 201H Housing Project is sited adjacent to the County Project (See **Figure 2**). Completing the Hōkūāo 201H Housing Project would bring the infrastructure closer to the property line of the proposed County Project site. This could potentially benefit the County Project, by bringing down the cost of the infrastructure of the County Project (e.g., shorten the distance to install new infrastructure). However, if the County would be interested in pursuing this option, further discussion would be needed.

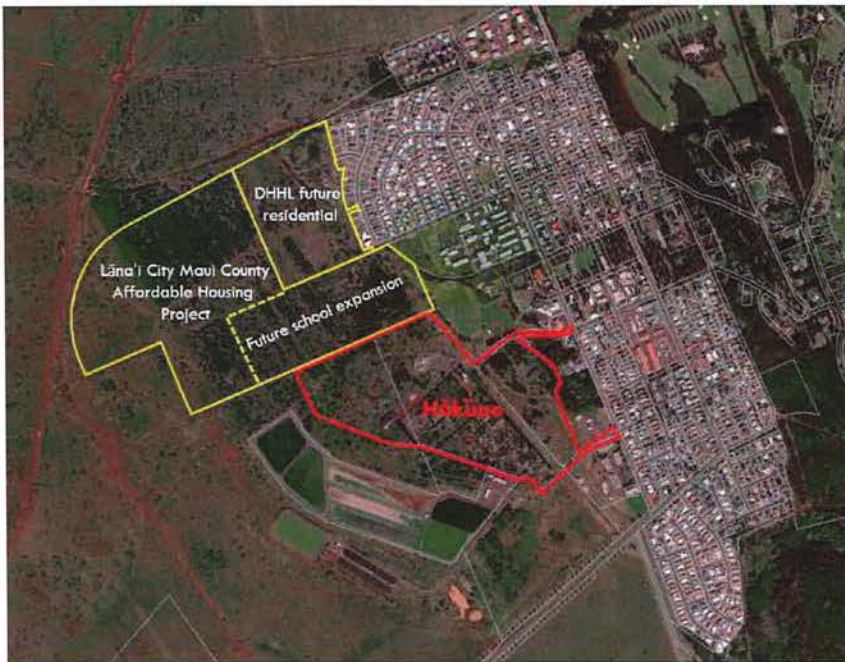


Figure 2: Aerial map from Google Earth of Lāna'i City with red outline for the Hōkūāo 201H Residential project, yellow outlines identified here for the County Project, future school expansion, and DHHL future residential development.

The opportunity for home ownership has been and will continue to be available. According to Multiple Listing Services ("MLS"), there have been 139 single family homes sold in Lāna'i City between 2013 and 2020. More than half of the homes were purchased by Lāna'i residents, 25% were purchased by neighbor

⁷ <https://www.mauicounty.gov/DocumentCenter/View/8995/Lanai-City-Affordable-Housing-Project-Power-Point?bidId=>

⁸ <http://mauicounty.us/wp-content/uploads/2018/02/Maui-Affordable-Housing-Implementation-Plan-FINAL.pdf> (pages 106 - 108)

⁹ <https://www.hawaiinewsnow.com/story/30613200/affordable-housing-project-stalls-on-lanai/>

¹⁰ <https://www.mauinews.com/news/local-news/2015/10/lanai-residents-grill-arakawa-on-stalled-affordable-housing-project/>

¹¹ Ibid

island residents, and the remaining 19% purchased by out of state persons.¹² This data set is illustrated in Figure 3. During this tenure, the applicant purchased five homes in Lāna'i City, or 3.6% of the homes.

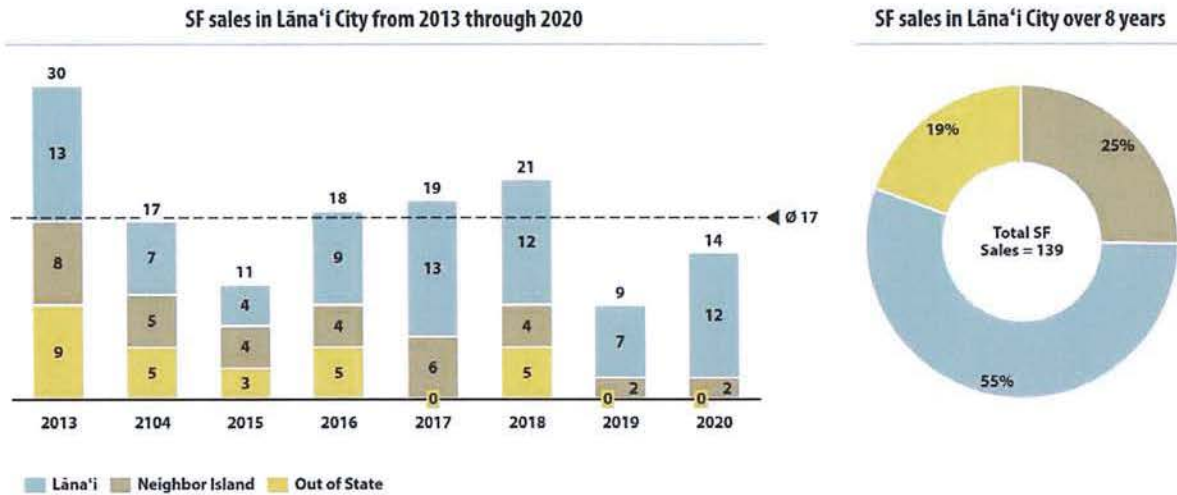


Figure 3: Internal analyses of MLS data for single family (SF) sales in Lāna'i City from 2013 through 2020.

There are¹³ and will be homeownership opportunities, including the County Project and other future for sale options by the applicant of homes in Lāna'i City. According to the 2019 American Community Survey Housing data set, the housing tenure on Lāna'i for occupied units is 40% renter occupied and 60% owner occupied (see Figure 4).¹⁴ There is diversity in the community regarding tenure of occupied units.

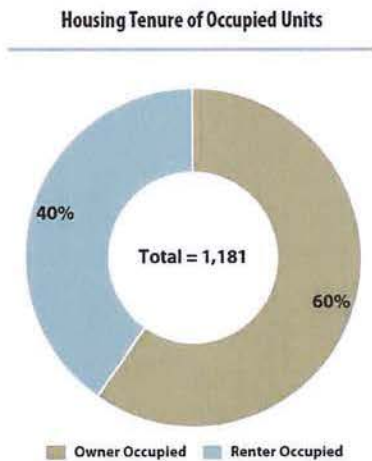


Figure 4: Diversification exists between owner occupied and renter occupied units on Lāna'i.

¹² Internal analysis of MLS data from 2013 to 2020.

¹³ MLS data as of 27JAN21 shows seven Single Family units for sale in Lāna'i City.

¹⁴ Data downloaded on 16JAN21 from <https://data.census.gov>, 2019 American Community Survey, Data set: ACSDP5Y2019, Table DP04 Housing

BUTCH GIMA
P.O. Box 630400
Lana'i City, HI 96763-0400

January 14, 2021

Lori Tshako, Director
Department of Housing & Human Concerns
County of Maui
200 S. High St.
Wailuku, HI 96793

RE: Draft Environmental Assessment (EA)
Hokuao 201-H Housing Project

Dear Lori,

Conceptually, I am in favor of increasing the housing supply on Lana'i. Nevertheless, I feel the Draft EA is incomplete specific to Water. Notwithstanding the variety of benefits the proposed project could bring to our community, I believe a FONSI is a premature conclusion given the following:

1. There was no specific reference to how this project conforms or does not conform to Lanai's Water Use and Development Plan and/or Community Plan.
2. Specifically, there was no reference to whether the project's proposed water use is within or exceeds the island's allocation and/or the categorical allocation.
3. Most importantly, the EA does not specify whether the project's proposed water demand plus the island's current water use plus the approved water allocation for entitled projects exceeds the 4.3MGD threshold set by the Commission on Water Resource Management. The EA only talks about the project's anticipated water use instead of the totality of water use (current, project projection and approved allocations of projects not yet built). It's irresponsible to mention only the former when the latter is the important figure.

As a side note, Pulama Lana'i (PL) could have saved a lot of time and energy had they vetted this project with the Lana'i Water Advisory Committee (LWAC) as had been done many times before over the last 25+ years. The aforementioned issues would have been discussed and ultimately consensus would've been reached and/or a recommendation offered as it's been done with the Lana'i Planning Commission.

However, PL has not participated in the LWAC since May 2017.

To summarize, the Final EA is missing critical water data and information, thus my statement about issuing a FONSI prematurely. Until the aforementioned issues are addressed an informed decision about the project's impact on our water cannot be responsibly made.

Thank you for considering my input.

Sincerely,

/s/ Butch Gima

May 17, 2021

Butch Gima
Lānaʻi Resident
P. O. Box 630400
Lānaʻi City, Hawaiʻi 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Mr. Gima:

Thank for your letter dated January 14, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lānaʻi (w/attachment)
Olivia Simpson, Pūlama Lānaʻi (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)
Kevin Mendes, RM Towill (w/attachment)

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* In accordance with Hawaiʻi Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: There was no specific reference to how this project conforms or does not conform to Lanai's Water Use and Development Plan and/or Community Plan.

Response 01:

Lāna'i Water Use and Development Plan ("LWUDP")

The Hōkūāo 201H Housing Project conforms with the LWUDP. Section 4.7 Water Resources & Wastewater of the Draft EA ("DEA") has extensive references to the LWUDP. Discussion on the LWUDP occurs on pages 90 through 99 and pages 120 to 121.

The applicant is in the process of permitting the development of Well 7, which will be connected to the Lāna'i City distribution system along with Wells 6, 8 and 3. Well 7 will provide additional source capacity and reliability. This is consistent with the LWUDP, there is significant discussion in the DEA on pages 102-103 regarding Well 7.

Lāna'i Community Plan ("LCP")

We believe it is clear that the Hōkūāo 201H Residential Project conforms with the LCP, referring to pages 34-35 in the DEA. The discussion references the LCP extensively, in particular the "*stated desire for rural lifestyle and need for affordable housing.*"

In addition, on page 116 of the DEA, there is a chart from the LCP¹ that identifies Lāna'i City Expansion, which includes the proposal to incorporate the Lāna'i City Maui County Affordable Housing Project ("County Project")^{2 3 4 5}. The Hōkūāo 201H Housing Project is sited adjacent to the proposed County Project, as illustrated in **Figure 1** and outlined in red. The Hōkūāo 201H Housing Project is an extension of Lāna'i City via 9th and 12th Streets.

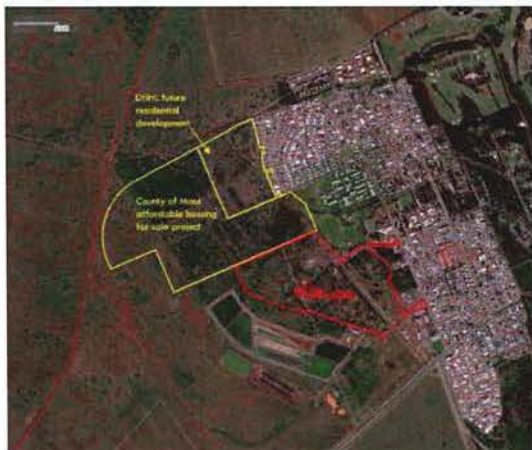


Figure 1: Aerial map from Google Earth of Lāna'i City with red outline for the Hōkūāo 201H Residential project, yellow outlines identified here for the County Project, and Department of Hawaiian Homelands (DHHL) future residential development.

¹ LCP Table 9.2 that describes the acreage by growth area and land use designation

² <https://www.mauicounty.gov/DocumentCenter/View/8995/Lanai-City-Affordable-Housing-Project-Power-Point?bidId=>

³ <http://mauicounty.us/wp-content/uploads/2018/02/Maui-Affordable-Housing-Implementation-Plan-FINAL.pdf> (pages 106 - 108)

⁴ <https://www.hawaiinewsnow.com/story/30613200/affordable-housing-project-stalls-on-lanai/>

⁵ <https://www.mauinews.com/news/local-news/2015/10/lanai-residents-grill-arakawa-on-stalled-affordable-housing-project/>

Comment 02: Specifically, there was no reference to whether the project's proposed water use is within or exceeds the island's allocation and/or the categorical allocation.

Response 02:

The LWUDP⁶ does not include allocations, rather it provides a resource development strategy. In Section 4.7, on page 101 of the DEA, the Lāna'i Monthly Pumpage chart⁷ was presented. It is replicated in **Figure 2** for convenient discussion purposes. At the time of the DEA, the current daily demand was 1.6 MGD.

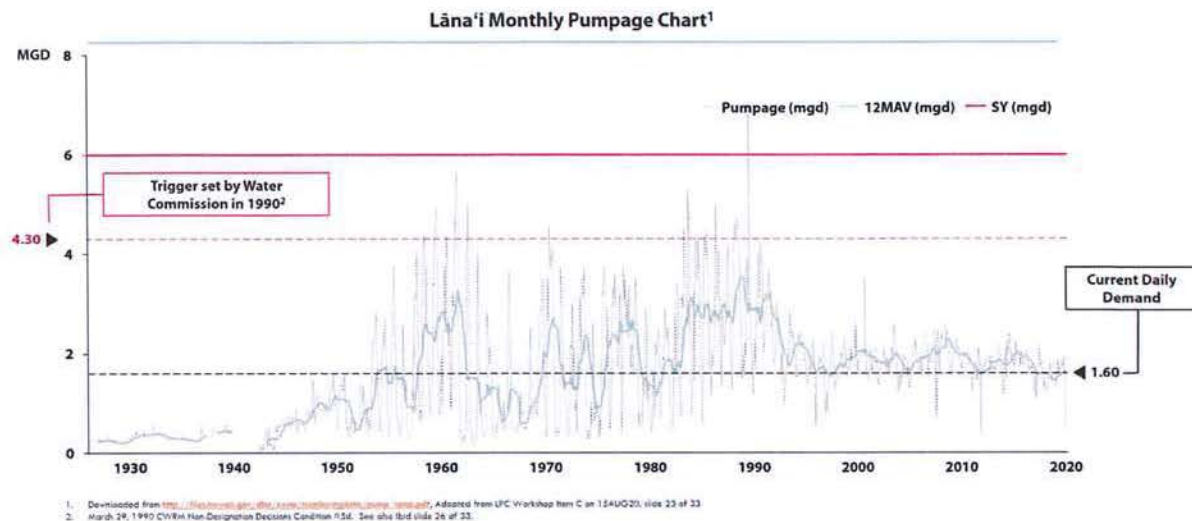


Figure 2: Duplication of chart on page 101 in the DEA. The solid light aqua blue line shows the 12-month moving average, the dotted gray line is the monthly Pumpage, the solid red line is the sustainable yield ("SY") for Lāna'i at 6 million gallons per day ("MGD"), and the red dotted line is pegged at 4.3 MGD, which is the trigger set by the Water Commission in 1990.

As stated on page 99 of the DEA, when the actual water use exceeds 4.3 MGD (see **Figure 2**, dotted red line trigger), the Chairperson of the Water Commission⁸ is authorized to re-institute water management-area designation proceedings and, hence re-evaluations of the ground water conditions would commence. The current daily demand in **Figure 2** is 1.6 MGD, which is 73.3% less than the sustainable yield ("SY") and 62.8% less than the trigger set by the Water Commission. **Figure 3** was created using the information from **Figure 2** to aid in these calculations.

⁶ See the Dept of Water Amended Draft Letter from the Director, page 3 item (3)(b), which states "The Proposed Allocation Plan tables in Chapter 7 of the BWS draft and related text, that could be interpreted to allocate water according to specific schedules or triggers, have been removed. The Proposed Allocation Plan tables have been relabeled, moved, and reframed as part of the Resource Development Strategy explained in the main text and Chapter 5 of the Supporting Documentation. Alternative language regarding land entitlements is provided in the *Lanai Island Water Plan Provisions* section of the main text.

⁷ The data set used to create this graphic was downloaded from https://files.hawaii.gov/dlnr/cwrm/monitoringdata/pump_lanai.pdf.

⁸ Lāna'i Planning Commission Regular Meeting Minutes August 19, 2020 at Page 36. Presentation by Roy Hardy, Commission on Water Resource Management.

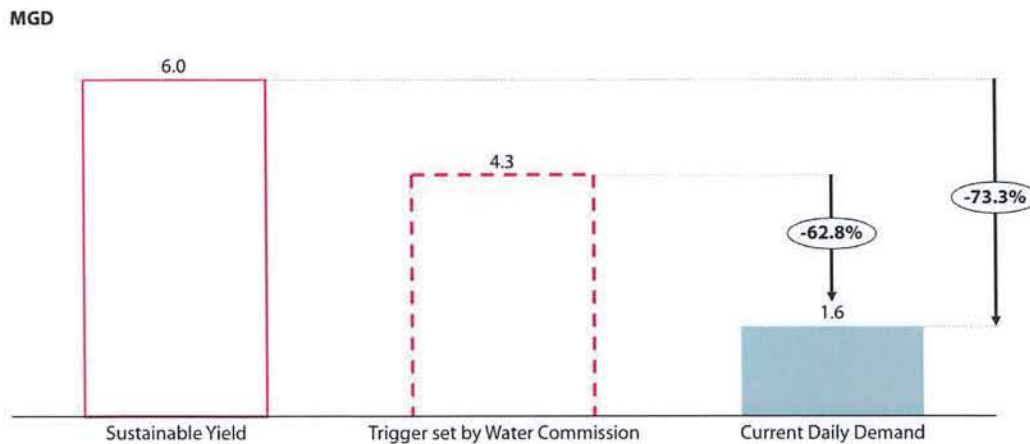


Figure 3: Graphical representation to aid in the comparison of the current water daily demand, the trigger set by the Water Commission and the Sustainable Yield for Lānaʻi.

The preliminary engineering report ("PER") that estimated the daily water demand was conducted by RM Towill Corporation; the full PER is included as Exhibit G in the DEA. It should also be noted that the PER was conducted for 200 homes not 150 homes. Therefore, the daily water demand presented in the DEA is overstated at an estimated daily demand of 121,700 gallons per day (GPD). Actual water usage for the proposed 150 homes is anticipated to be less than the 121,700 GPD.

Utilizing an additional 121,700 GPD would not trigger the 4.3 MGD or exceed the 6 MGD SY. Further, as previously noted, the proposed project is anticipated to be less than the 121,700 GPD as the water usage was calculated for 50 more homes than planned.

Comment 03: Most importantly, the EA does not specify whether the project's proposed water demand plus the island's current water use plus the approved water allocation for entitled projects exceeds the 4.3MGD threshold set by the Commission on Water Resource Management. The EA only talks about the project's anticipated water use instead of the totality of water use (current, project projection and approved allocations of projects not yet built). It's irresponsible to mention only the former when the latter is the important figure.

Response 03:

On page 102 in the DEA, there is discussion about the estimated water demand for the Hōkūao 201H Housing Project. On page 101, the graph shows the current water demand for Lānaʻi. On pages 108 to 115 of the DEA, there is discussion about near-term anticipated water demands. These include projects in the process of land entitlements⁹ or have been discussed at monthly community informational meetings hosted by Pūlama Lānaʻi and have not been submitted to agencies for permitting and entitlement.¹⁰

⁹ <https://luc.hawaii.gov/pending-petitions-2/boundary-amendments/a19-809-lanai-resorts-llc-dba-pulama-lanai/a19-809-lanai-resorts-llc-dba-pulama-lanai-miki-basin-enviromental-assessment-2020/>

¹⁰ <https://lanai96763.com/wp-content/uploads/2019/09/Koele-Project-District-flyer-09-23-19.pdf>

Figure 4 is a graphical representation to show the forecasted daily demand in comparison to the 4.3 MGD trigger set by the Water Commission and the 6 MGD SY. The red bar "Project" is the Hōkūāo 201H Housing Project.¹¹ The "Other Projects" are tabulated on pages 114 and 115 of the DEA and represented as a dotted bar. It is clear from this graph that the forecasted demand is below the 4.3 MGD trigger.

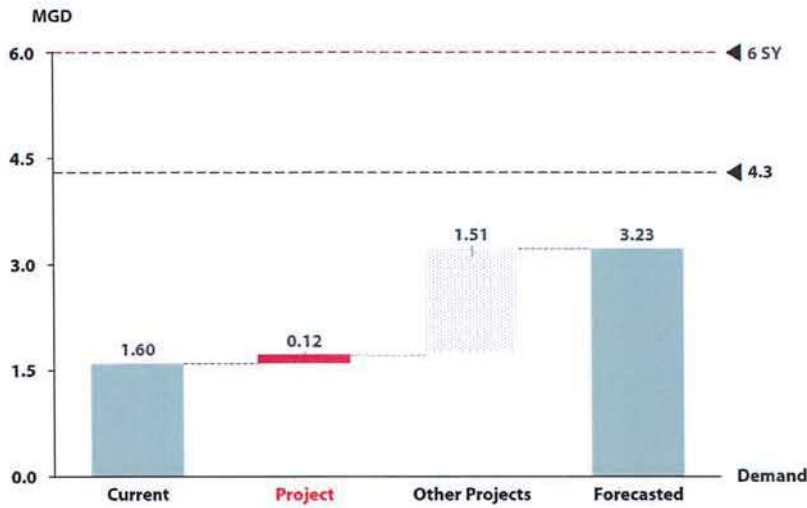


Figure 4: Graphical representation of the current, estimated project, estimated other projects, and forecasted daily water demand in comparison to the 4.3 MGD trigger set by the Water Commission and the island's SY of 6 MGD.

¹¹ Please note that this is a conservative estimate as the PER in Exhibit G (Table 4-1) in the DEA contemplated 200 homes, the project is 150 homes, 25% less.

>>> Robin Kaye <rkayelny@gmail.com> 1/13/2021 7:20 AM >>>

Aloha:

Please find my attached comments on this draft EA:
**Proposed Hokuao 201H Housing Project at TMKs (2)4-9-002:061
(POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lana'i City, Hawai'i;
Publication of the Draft Environmental Assessment and Anticipated Finding of No Significant Impact**

An acknowledgement of their receipt would be appreciated.

Mahalo,

Robin Kaye

--

Robin Kaye
P.O. Box 631313
Lana'i City, HI 96763
808-559-6124 (m)
rkayelny@gmail.com

January 13, 2021

Comments regarding:

Proposed Hokuao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lana'i City, Hawai'i.

Publication of the Draft Environmental Assessment and Anticipated Finding of No Significant Impact.

Housing on Lana'i has long been a major community challenge. With Maui County's inexplicable delays — and apparent abandonment — of its long-awaited and way-overdue housing project, Pulama Lana'i has determined to provide an alternative. The proposed Hokuao Housing Project will offer affordable and market rate rental homes to Lana'i residents. That is a good thing.

There are several issues that are, however, concerning and worrisome:

- All of these 150 single-family homes will be rentals; there is no provision for purchase. While this is a valuable addition to the community's housing stock, it misses an opportunity to support home ownership and long-term commitment to building a more diverse community.
- These units will be located, according to the draft EA's maps, a mere 600 feet from the waste water treatment plant. On page 137, CBRE "*...concluded that although there are some concerns regarding the proximity of the existing waste water treatment plant to the project site (which we determined was of only a minor issue)...*" It is a puzzlement as to why this housing project is sited so close to that plant. Clearly, when the Kona winds prevail, the waste water treatment plant will become a significant — and no doubt detrimental — component of the project's environment.
- Will there be priorities assigned for allocating these rental homes? Will employees receive first choice? Kupuna? Long-time residents? Off-island residents seeking to live on Lana'i?

- The draft EA includes multiple mentions of a “Community Center,” but there are no descriptions or information regarding its components. It is listed as having a footprint of 1500 square feet — the equivalent size of less than two of the projects’ combined affordable lease units. This appears to be way too small for the projected population of this housing project.

Thank you for the opportunity to comment.

Robin Kaye

Robin Kaye
Lana’i Resident

May 17, 2021

Email: rkayelny@gmail.com

Robin Kaye
Lāna'i Resident
P. O. Box 631313
Lāna'i City, Hawai'i 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City,
Hawai'i.

Dear Mr. Kaye:

Thank for your letter dated January 13, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lāna'i (w/attachment)
Olivia Simpson, Pūlama Lāna'i (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

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Comment 01: All of these 150 single-family homes will be rentals; there is no provision for purchase. While this is a valuable addition to the community's housing stock, it misses an opportunity to support home ownership and long-term commitment to building a more diverse community.

Response 01:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of home ownership. Several community meetings¹ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūāo 201H Housing Project over the last five years. The applicant evaluated many factors, including but not limited to comments and feedback received from community meetings, completed studies, laws, and current market conditions² in the design and offering for the Hōkūāo 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

Affordable housing is needed on Lāna'i, this topic has been discussed at numerous venues for over several decades. The Hōkūāo 201H Housing Project is a complement to other residential housing projects, such as the proposed Lāna'i City Maui County Affordable Housing Project ("County Project")^{3 4 5 6} and the future residential development for the State of Hawai'i Department of Hawaiian Home Lands ("DHHL").

According to news reports,⁷ the infrastructure installation costs impeded the progress of the County Project (e.g., land locked and far from current infrastructure). The Hōkūāo 201H Housing Project is sited adjacent to the County Project (See **Figure 1**). Completing the Hōkūāo 201H Housing Project would bring the infrastructure closer to the property line of the proposed County Project site. This could potentially benefit the County Project, by bringing down the cost of the infrastructure of the County Project (e.g., shorten the distance to install new infrastructure). However, if the County would be interested in pursuing this option, further discussion would be needed.



Figure 1: Aerial map from Google Earth of Lāna'i City with red outline for the Hōkūāo 201H Residential project, yellow outlines identified here for the County Project, future school expansion, and DHHL future residential development.

¹ Pūlama Lāna'i Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.
² Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'i.
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⁴ <http://mauicounty.us/wp-content/uploads/2018/02/Maui-Affordable-Housing-Implementation-Plan-FINAL.pdf> (pages 106 - 108)
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⁶ <https://www.mauinews.com/news/local-news/2015/10/lanai-residents-grill-arakawa-on-stalled-affordable-housing-project/>
⁷ Ibid

The opportunity for home ownership has been and will continue to be available. According to Multiple Listing Services ("MLS"), there have been 139 single family homes sold in Lāna'i City between 2013 and 2020. More than half of the homes were purchased by Lāna'i residents, 25% were purchased by neighbor island residents, and the remaining 19% purchased by out of state persons.⁸ This data set is illustrated in Figure 2. During this tenure, the applicant purchased five homes in Lāna'i City, or 3.6% of the homes.

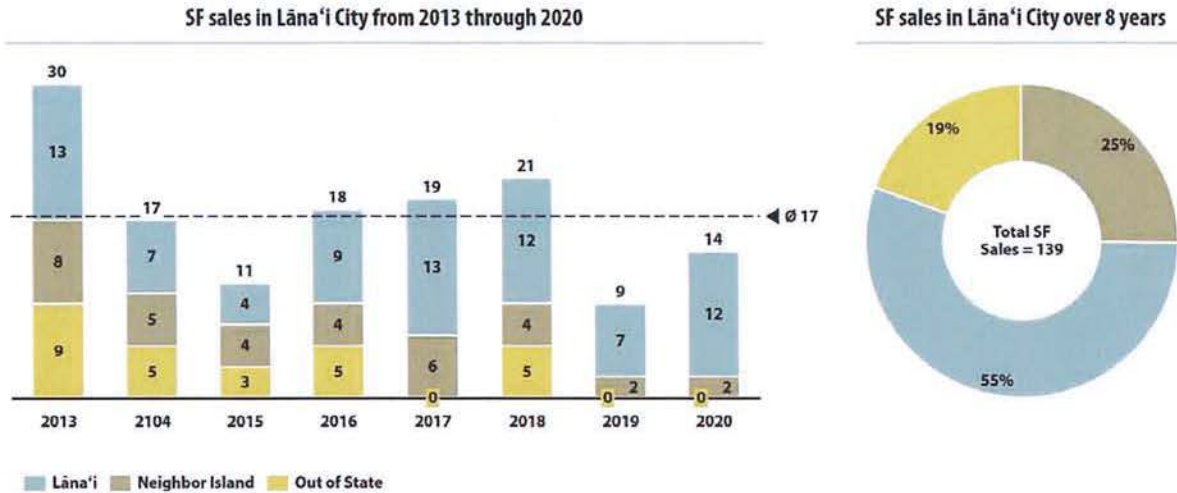


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There are⁹ and will be homeownership opportunities, including the County Project and other future for sale options by the applicant of homes in Lāna'i City. According to the 2019 American Community Survey Housing data set, the housing tenure on Lāna'i for occupied units is 40% renter occupied and 60% owner occupied (see Figure 3).¹⁰ There is diversity in the community regarding tenure of occupied units.

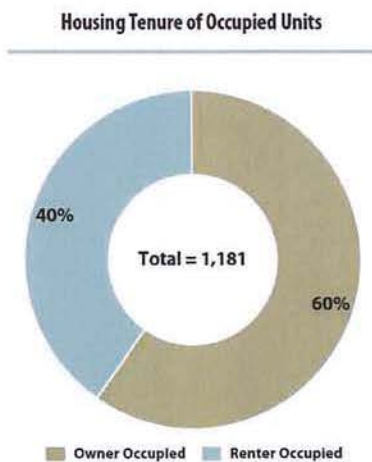


Figure 3: Diversification exists between owner occupied and renter occupied units on Lāna'i.

⁸ Internal analysis of MLS data from 2013 to 2020.

⁹ MLS data as of 27JAN21 shows seven Single Family units for sale in Lāna'i City.

¹⁰ Data downloaded on 16JAN21 from <https://data.census.gov>, 2019 American Community Survey, Data set: ACSDP5Y2019, Table DP04 Housing

Comment 02: These units will be located, according to the draft EA's maps, a mere 600 feet from the waste water treatment plant. On page 137, CBRE "...concluded that although there are some concerns regarding the proximity of the existing waste water treatment plant to the project site (which we determined was of only a minor issue)..." It is a puzzlement as to why this housing project is sited so close to that plant. Clearly, when the Kona winds prevail, the waste water treatment plant will become a significant — and no doubt detrimental — component of the project's environment.

Response 02:

Site selection

The project location was selected due to the proximity to Lāna'i City (extension of the City) and community amenities (e.g., school, market, businesses, etc.). It is close enough that future residents of the Hōkūao 201H Housing Project could walk to these establishments.

Proximity to the Wastewater Treatment Plant ("WWTP")

Exhibit D and Section 4.12 Air Quality (starting on page 152) of the DEA included an extensive discussion regarding the air quality impacts of the project area. A study by B.D. Neal & Associates, included as Exhibit D, described the methodology and findings of potential short and long term air quality impacts that could occur as a result of construction and use of the proposed development and suggested mitigation measures to reduce any potential air quality impacts where possible and appropriate. Potential impacts on the proposed development from the nearby wastewater treatment facility (aka WWTP) was also evaluated. The study utilized both national and state ambient air quality standards ("AAQS").¹¹

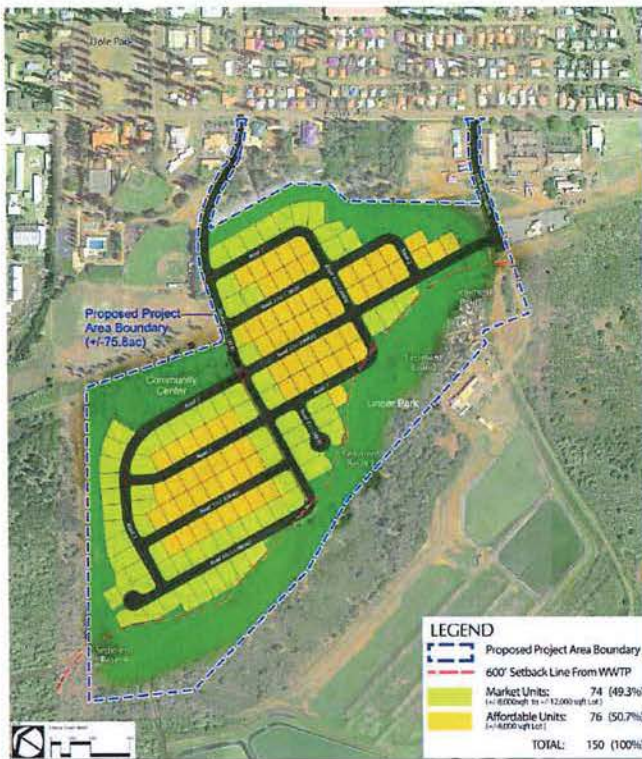
As detailed in Section 8 in Exhibit D, generally WWTPs are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds.¹² It is further stated that these types and compounds in the air are generally not considered hazardous to human health, but when they occur in high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses.

A study was conducted and described in Section 8 of Exhibit D. Hydrogen sulfide measurements were collected; there were no measurable hydrogen sulfide concentrations at any location along the plant perimeter. It was recommended by the consultant that it would be prudent for the proposed project to maintain a buffer distance at least 300 to 600 feet from the WWTP boundary.¹³ The Hōkūao 201H Housing Project implemented the maximum recommendation buffer of 600 feet from the WWTP boundary (see **Figure 4**).

¹¹ National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations, while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1 in Exhibit D summarizes the standards.

¹² Exhibit D Section 8 Waste Water Treatment Plant

¹³ Exhibit D Section 9 Conclusions and Recommendations



Hokuao Homes 201H Housing
Conceptual Lot Plan
10/16/2020



Figure 4: Dotted red line depicts the 600 foot setback line from the WWTP.

Comment 03: Will there be priorities assigned for allocating these rental homes? Will employees receive first choice? Kūpuna? Long-time residents? Off-island residents seeking to live on Lāna'i?

Response 03:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of prioritization of allocation of units. Several community meetings¹⁴ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūāo 201H Housing Project over the last five years. The applicant evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions¹⁵ in the design and offering for the Hōkūāo 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

The applicant is working on the details regarding the application process for the affordable homes. Should this project receive approvals from the County Council and State Land Use Commission, the details will be finalized and shared with the community on Lāna'i.

¹⁴ Pūlama Lāna'i Community Information Meetings 01AUG16 (Former DHHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

¹⁵ Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'i.

January 21, 2021

Lori Tshako, Director
County of Maui Department of Housing & Human Concerns
2200 Main St., Suite 546
Wailuku, HI 96793

RE: Draft Environmental Assessment (EA) Proposed Hōkūao 201H Housing Project, Lānaʻi

Ms. Tshako:

Please accept the following comments and questions that the above-referenced EA should address:

At a public meeting of the Lānaʻi Planning Commission on January 20, 2021, the overwhelming consensus of those attending/testifying was that the island of Lānaʻi needs more housing opportunities. The testifiers were divided, however, on whether the need/desire for “for-sale” opportunities outweighed a need for more rental units.

- Please clarify how many rental units currently exist on island (*i.e.*, the Courts, Iwiolo, the Quads, and other units under the applicant’s control); how many units are planned for the current construction at Koele and for whom intended; and how many individuals, if any, are on any waiting list for existing units.
- A number of supporting studies and docs included in the EA (*see e.g.* Exhibit G, 1-2) assumed there would be 200 units for sale, but reduced this number to 150 and to all rentals – please explain the shift in focus, why it occurred and whether the applicant will consider offering half of the units as rent-to-own (lease option) opportunities to Lānaʻi residents. If not, why not.

HRS §196-6.5 requires solar water heating systems for all new single-family residential construction after 2010.

- Please explain why this requirement is not included or addressed in the proposed Hōkūao project draft EA.
- On 11/9/2020 Urban Works Inc. applied for an exemption on behalf of Pulama Lānaʻi with DBEDT’s energy office (https://energy.hawaii.gov/wp-content/uploads/2020/09/SWHV-List_Jan_12_2021.pdf). Please confirm whether this exemption applies to the Hōkūao proposal and on what basis was the exemption sought.
- The draft EA at p. 209 states “Homes may include solar photovoltaic on-site generation with individual home battery storage.” Please explain this statement.
- The draft EA at p. 191 states “The use of solar energy production as the primary energy source will not only assist in resource protection, but also serve as a demonstration for others.” Please explain this statement and what it is referencing.

Please address how the leasing system envisioned for the proposal would avoid high turnover.

- For example, a construction company could sign the minimal 6-month lease, but individual workers could move in and out frequently, negatively impacting an otherwise residential neighborhood.

Many residents do not believe the HUD/CoM guidelines accurately reflect the economic reality of Lānaʻi prices and economics.

- Please discuss why the project can't offer 75% of the units as affordable.

There are several references to past chemical saturation in the proposed Hōkūāo area (P. 74-79) and proposed remedial actions taken and planned.

- "Dioxins/furans were found to exceed the HDOH EAL in one of two samples collected around the perimeter of the former Emulsion Plant. Therefore, it was recommended additional surface soil sampling be performed in the area around Sample EP-SS1 to further assess the area." (p. 74) Please address whether this has been done and what were the findings.
- "Full details and laboratory results of the removal action will be presented in TRC's forthcoming *Removal Action Completion Report* planned for late 2020" (p. 78) and "Construction activities on the Hōkūāo 201H Housing Project will not commence until the Removal Action Completion Report is accepted and approved, and the Hawaii Department of Health or other applicable regulatory authority has issued a No Further Action (NFA) letter or other similar closure document." (p. 79) Please provide a status of this Report and identify which "other applicable regulatory" authorities are referenced.

The draft EA at p. 92 states that "The Project falls within the Leeward Aquifer; however, water to support the project is intended to come from the Leeward and Windward aquifers." Please explain what source in the Windward aquifer is referenced and whether it is an existing or future source.

The draft EA at p. 209 states that "Homes will incorporate ... on-demand hot water heaters." Assuming structures will not have solar hot water infrastructure, please explain why an "on-demand" hot water heater is more energy efficient than traditional electric hot water systems.

The CBRE market analysis (Exhibit F at p. 24) states "Acknowledging the long-term trend towards smaller households, the impact of non-resident renters (moving from between 13 percent to 25 percent by 2035), and a vacancy allowance moving up to 3 percent to achieve a stable market, we have quantified the total mid-point demand for new housing inventory in Lānaʻi at 465 units between late-2020 and the end of 2035."

- Please explain what is meant by "non-resident renters," why it is anticipated they will expand to ¼ of the island's population, and for what purposes they would be on island but not residing here.

Thank you for your consideration of the above.

/s/ Sally Kaye

P.O. Box 631313
Lānaʻi City, HI 96763
808-565-6276
skaye@runbox.com

May 17, 2021

Email: skaye@runbox.com

Sally Kaye
P. O. Box 631313
Lānaʻi City, Hawaiʻi 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Ms. Kaye:

Thank for your letter dated January 21, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab
Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lānaʻi (w/attachment)
Olivia Simpson, Pūlama Lānaʻi (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

K:\DATA\Pulama Lanai\Lanai City Expansion 1939\Applications\Draft EA\DEA response letters\Substantive Letter Template.docx

* In accordance with Hawaiʻi Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: Please clarify how many rental units currently exist on island (i.e., the Courts, Iwiolo, the Quads, and other units under the applicant's control); how many units are planned for the current construction at Koele and for whom intended; and how many individuals, if any, are on any waiting list for existing units.

Response 01:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of understanding the rental housing inventory on island.

Pūlama Lāna'i does not "control" all of the rental units, there are others that offer rentals on island. Currently, the applicant rents out 230 single family units ranging from one to four bedrooms and 220 multifamily units ranging from studio to three bedrooms.

On January 15, 2020 at the Lāna'i Planning Commission ("LPC") meeting, the LPC waived their review of the Phase III Project District for a 20-unit residential project. These units will be used for workforce housing to support on island operations.¹

A waitlist does not exist for market rate rentals.

Comment 02: A number of supporting studies and docs included in the EA (see e.g. Exhibit G, 1-2) assumed there would be 200 units for sale, but reduced this number to 150 and to all rentals – please explain the shift in focus, why it occurred and whether the applicant will consider offering half of the units as rent-to-own (lease option) opportunities to Lāna'i residents. If not, why not.

Response 02:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of 200 units in the project studies versus the 150 units proposed in the Draft EA. Several community meetings² and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūāo 201H Housing Project over the last five years. The applicant evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions³ in the design and offering for the Hōkūāo 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

The studies were completed over a period of time and the project evolved based on the aforementioned reasons. When the decision was made on the final parameters of the project, the technical studies prepared were re-evaluated to determine whether the reduction in units would have an impact on the study area. It was determined that since the number of units were being reduced, the overall project impacts would also be reduced. As such, the studies were viewed as a conservative evaluation of the project's potential impacts.

¹ <https://www.mauicounty.gov/ArchiveCenter/ViewFile/Item/27013>

² Pūlama Lāna'i Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

³ Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'i.

Comment 03: HRS §196-6.5 requires solar water heating systems for all new single-family residential construction after 2010. Please explain why this requirement is not included or addressed in the proposed Hōkūāo project draft EA.

Response 03:

Although the comment is not within the scope of the draft Environmental Assessment ("DEA"), the applicant recognizes the comment regarding the applicability of HRS §196-6.5 Solar water heater system required for new single-family residential construction and whether the applicant will be applying for a variance.

HRS §196-6.5 Solar water heater system required for new single-family residential construction, is applicable to the Hōkūāo 201H Housing Project, by definition (new single family residential construction). There are also list of variances that are applicable, in particular §196-6.5 (a) (3): a renewable energy technology system, as defined in section 235-12.5, is substituted for use as the primary energy source for heating water.⁴

There were multiple references regarding potential solar energy production on-site, including home battery storage, for the homes in the Draft Environmental Assessment ("DEA").⁵ The applicant is also evaluating the potential to install a solar roof on the homes, which would include a battery energy storage system. These renewable energy systems would provide power to the home, therefore, the hot water heater would also be powered by renewable energy sources.

Given the aforementioned, it is possible that the applicant may be seeking a variance as allowed per HRS §196-6.5 (a) (3).

Comment 04: On 11/9/2020 Urban Works Inc. applied for an exemption on behalf of Pulama Lāna'i with DBEDT's energy office (https://energy.hawaii.gov/wp-content/uploads/2020/09/SWHV-List_Jan_12_2021.pdf). Please confirm whether this exemption applies to the Hōkūāo proposal and on what basis was the exemption sought.

Response 04:

Confirmed, the application (OL2020-11-09-05) noted in Comment 04 that was approved by the State Energy Office at the Department of Business Development & Tourism ("DBEDT"), is **not** for the Hōkūāo 201H Housing Project. Application OL2020-11-09-05 is associated with an unrelated project. The exemption for this unrelated project was sought because the hot water heater will be powered by a renewable photovoltaic source, which is the reason DBEDT approved the application.

⁴ See extensive discussion here: <https://energy.hawaii.gov/resources/solar-water-heater-variance>

⁵ DEA Pages 191, 209, Exhibit D Page 27, and Exhibit F Page 15.

Comment 05: The draft EA at p. 209 states "Homes may include solar photovoltaic on-site generation with individual home battery storage." Please explain this statement.

Response 05:

Please see response to Comment 03.

Comment 06: The draft EA at p. 191 states "The use of solar energy production as the primary energy source will not only assist in resource protection, but also serve as a demonstration for others." Please explain this statement and what it is referencing.

Response 06:

Please see response to Comment 03. Further, we note that there are a limited number of 201H projects that have deployed on-site renewable generation at the scale that the applicant is contemplating. Should the applicant proceed with this option for Hōkūāo, it would be an example for others to consider similar renewable resources in their housing projects.

Comment 07: Please address how the leasing system envisioned for the proposal would avoid high turnover. For example, a construction company could sign the minimal 6-month lease, but individual workers could move in and out frequently, negatively impacting an otherwise residential neighborhood.

Response 07:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of understanding more about the terms of the rental agreement. The applicant has not finalized the rental agreement for the Hōkūāo 201H Housing Project, which is a 100% workforce housing project.

Comment 08: There are several references to past chemical saturation in the proposed Hōkūāo area (P. 74-79) and proposed remedial actions taken and planned.

Response 08:

TRC (environmental consultant) prepared a Sampling and Analysis Plan ("SAP") dated on December 5, 2017, outlining in detail the necessary steps to address and assess the previously identified data gaps. On pages 75 to 79 in the DEA, there was an extensive discussion on the steps that have occurred regarding the testing. The applicant is awaiting the final reports from TRC, which was initially planned to be submitted to the applicant in late 2020. Due to COVID travel restrictions there were delays in completing some of the work for these reports. TRC is scheduled to complete the final samplings in the first quarter of 2021, the Removal Action Completion Report will be forthcoming thereafter.

As stated on page 79 of the DEA, construction activities on the proposed project will not commence until the Removal Action Completion Report is accepted and approved, and the Hawaii Department of Health or other applicable regulatory authority has issued a No Further Action (NFA) letter or similar closure document.

Comment 09: The draft EA at p. 92 states that "The Project falls within the Leeward Aquifer; however, water to support the project is intended to come from the Leeward and Windward aquifers." Please explain what source in the Windward aquifer is referenced and whether it is an existing or future source.

Response 09:

The applicant is in the process of permitting the development of Well 7 (an existing source), which will be connected to the Lāna'i City distribution system along with Wells 6, 8 and 3. Well 7 will provide additional source capacity and reliability. This is consistent with the Lanai Water Use and Development Plan ("LWUDP") and there is significant discussion in the DEA on pages 102-103 regarding Well 7.

Comment 10: The draft EA at p. 209 states that "Homes will incorporate ... on-demand hot water heaters." Assuming structures will not have solar hot water infrastructure, please explain why an "on-demand" hot water heater is more energy efficient than traditional electric hot water systems.

Response 10:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of asking for an explanation on why an "on-demand" hot water heater is more energy efficient than traditional electric water systems. An "on-demand" water heater or "point of use" water heater is a tankless water heater. According to the Department of Energy, a tankless or "on demand" heater is more energy efficient than a "traditional" storage tank water heater. Both need electricity to operate.⁶ Traditional storage tank water heaters have standby heat losses, energy is wasted to keep the water in the tank heated to the set temperature. On-demand water heaters provide a constant supply of hot water and are 8-34% more energy efficient than traditional storage water heaters. Further, please see the applicant's response to Comment 03.

Comment 11: The CBRE market analysis (Exhibit F at p. 24) states "Acknowledging the long-term trend towards smaller households, the impact of non-resident renters (moving from between 13 percent to 25 percent by 2035), and a vacancy allowance moving up to 3 percent to achieve a stable market, we have quantified the total mid-point demand for new housing inventory in Lāna'i at 465 units between late-2020 and the end of 2035." Please explain what is meant by "non-resident renters," why it is anticipated they will expand to ¼ of the island's population, and for what purposes they would be on island but not residing here.

Response 11:

Exhibit F page vii of the Draft EA expands on the term used by CBRE (real estate consultant) as "second/vacation home buyer demographic." The aforementioned demographic is not the target market for the Hōkūāo 201H Residential Project. The market for the Hōkūāo 201H Residential Project is 100% workforce.

⁶ <https://www.energy.gov/articles/new-infographic-and-projects-keep-your-energy-bills-out-hot-water>

Fairfax (Pat) Reilly
468 Ahakea Street
P.O. Box 630111
Lanai City, HI 96763-0111
Email: kimchi508@outlook.com

To: planning@mauicounty.gov

Shelly Preza, Chair and Members of the Lana'i Planning Commission

Re: COMMENTS REGARDING HOKUAU 201H HOUSING PROJECT DRAFT EA

Position: **MODIFY THE PROPOSAL**

Aloha Chair Preza and Members,

Happy New Year. Thank you for the opportunity to comment on this important proposal. Your work in reviewing the EA is appreciated.

1. Request sufficient time to review and accept community input prior to concluding final comments on the plan.
2. The project should conform to Chapter 11, Housing of the Lana'i Community Plan, updated in 2016 which reflects the opinion of the broad Lana'i community via several years of work by the Community Plan Advisory Committee and accepted by the Lana'i Planning Commission.
3. The HOKUAU Project needs to address the needs of resident families working for Federal, State, County, healthcare, private businesses, non-profit organizations who have been preparing to purchase homes for years.
4. The County and Pulama conducted multiple community meetings which confirmed a desire to purchase a home was expressed.
5. Mortgage interest rates are at historic lows presenting perhaps a once-in-a-lifetime opportunity for long-term residents to save thousands of dollars over a thirty-year mortgage contract.
6. A variety of financing models were discussed along with models for maintaining low construction and sales costs.
7. Employees in the service and support sectors wish to remain on Lana'i and to raise families thus establishing a stable community.
8. I have included a web address of a study conducted by SMS for the Hawaii Housing Finance and Development Corporation.

Mahalo for your time.

<https://hi-mauicounty2.civicplus.com/DocumentCenter/View/105983/2016-Lanai-Community-Plan-?bidId=>

https://dbedt.hawaii.gov/hhfdc/files/2020/01/FINAL-State_Hawaii-Housing-Planning-Study.pdf

May 17, 2021

Email: kimchi508@outlook.com

Fairfax (Pat) Reilly
468 Ahakea Street
P. O. Box 630111
Lānaʻi City, Hawaiʻi 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City,
Hawaiʻi.

Dear Mr. Reilly:

Thank for your letter dated January 19, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lānaʻi (w/attachment)
Olivia Simpson, Pūlama Lānaʻi (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

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* In accordance with Hawaiʻi Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: Request sufficient time to review and accept community input prior to concluding final comments on the plan.

Response 01:

The applicant will be reviewing comment letters on the Draft Environmental Assessment (DEA) and incorporating any appropriate changes within the Final Environmental Assessment (FEA). A copy of your comment letter and this response will also be included in the FEA. Additionally, as noted at the January 20, 2021 Lanai Planning Commission ("LPC") meeting, the Hōkūāo project also has a Hawai'i Revised Statutes (HRS) 201H Affordable Housing application that will be publicly reviewed by the Maui County Council.

Comment 02: The project should conform to Chapter 11, Housing of the Lāna'i Community Plan, updated in 2016 which reflects the opinion of the broad Lāna'i community via several years of work by the Community Plan Advisory Committee and accepted by the Lāna'i Planning Commission.

Response 02:

Lāna'i Community Plan ("LCP")

The Hōkūāo 201H Residential Project conforms with the Lāna'i Community Plan ("LCP"). There is complete alignment that affordable housing is in the LCP". On pages 30-31 in the DEA, there is extensive discussion on the "stated desire for rural lifestyle and need for affordable housing found in the LCP. In these aforementioned pages, there are multiple references to the LCP, noting subsequent chapters and page numbers of the LCP (e.g., Lāna'i Community Plan, 10-1).

In addition, on page 116 of the DEA, there is a chart from the LCP¹ that identifies Lāna'i City Expansion, which includes the proposal to incorporate the Lāna'i City Maui County Affordable Housing Project ("County Project")^{2 3 4 5}. The Hōkūāo 201H Housing Project is sited adjacent to the County Project, as illustrated in **Figure 1** and outlined in red the Hōkūāo 201H Housing Project is an extension of Lāna'i City via 9th and 12th Street.



Figure 1: Aerial map from Google Earth of Lāna'i City with red outline for the Hōkūāo 201H Residential project, yellow outlines identified here for the County Project, and Department of Hawaiian Homelands (DHHL) future residential development.

¹ LCP Table 9.2 that describes the acreage by growth area and land use designation

² <https://www.mauicounty.gov/DocumentCenter/View/8995/Lanai-City-Affordable-Housing-Project-Power-Point?bidId=>

³ <http://mauicounty.us/wp-content/uploads/2018/02/Maui-Affordable-Housing-Implementation-Plan-FINAL.pdf> (pages 106 - 108)

⁴ <https://www.hawaiinewsnow.com/story/30613200/affordable-housing-project-stalls-on-lanai/>

⁵ <https://www.mauinews.com/news/local-news/2015/10/lanai-residents-grill-arakawa-on-stalled-affordable-housing-project/>

Comments 03 to 07: The HOKUAU Project needs to address the needs of resident families working for Federal, State, County, healthcare, private businesses, non-profit organizations who have been preparing to purchase homes for years.

The County and Pūlama conducted multiple community meetings which confirmed a desire to purchase a home was expressed.

Mortgage interest rates are at historic lows presenting perhaps a once-in-a-lifetime opportunity for long-term residents to save thousands of dollars over a thirty-year mortgage contract.

A variety of financing models were discussed along with models for maintaining low construction and sales costs.

Employees in the service and support sectors wish to remain on Lana'i and to raise families thus establishing a stable community.

Response 03 to 07:

Although the comment is not within the scope of the Draft Environmental Assessment ("DEA"), the applicant recognizes the comment of home ownership. Several community meetings⁶ and smaller focus group meetings, facilitated by the applicant, have occurred regarding the Hōkūao 201H Housing Project over the last five years. The applicant has evaluated many factors, including but not limited to comments and feedback received from the community, completed studies, laws, and current market conditions⁷ in the design and offering for the Hōkūao 201H Housing Project. The applicant's proposed project is the collective outcome of these considerations.

⁶ Pūlama Lāna'i Community Information Meetings 01AUG16 (Former DHHC Director Carol Reinmann was an invited guest presenter), 12NOV18, and 22FEB21.

⁷ Global pandemic, the impact of the Coronavirus has affected the world, including Lāna'i.

>>> Pat Reilly <kimchi508@outlook.com> 1/21/2021 12:52 PM >>>

Director Tsuhakuo, please accept my response regarding the HOKUAU DRAFT EA. Mahalo, Pat Reilly, Lana'i

Fairfax (Pat) Reilly
468 Ahakea Street
P.O. Box 630111
Lanai City, HI 96763-0111
Email: kimchi508@outlook.com

director.hhc@mauicounty.gov

To: Lori Tshako, Director
County of Maui
Department of Housing and Human Concerns

Re: LANA'I: HOKUAU 201H HOUSING PROJECT DRAFT EA RESPONSE

Position: SIGNIFICANT IMPACTS NOTED

Aloha Director Tshako,

1. 4.13 Air Quality, PP152+: DISAGREE:

- Testing was not determinative due to length of study.
- During periods of cleaning of settlement ponds, especially during week-long periods of Kona winds during the end of the calendar year and rainy season, odors are strong throughout Lana'i City.
- A better data set would be a community survey of residents in the city.
- I have been a resident for 42 years. The odor is sufficient to bring tears and a running nose
- Persons with breathing issues are affected.
- The proposed buffer will not mitigate the odor.
- While prevailing trade winds blow a majority of days, when the wind shifts the odor is significant.

2. 4.6 Geology, Soils & Drainage, PP82+: DISAGREE:

- Run-off, especially during periods of heavy rainfall, results in significant ponding in this area.
- R.M. Towill spent hours with resident groups to collect anecdotal information as to drainage throughout Lanai City.
- The elevation drop from Ko'ele through the city brings significant run-off during periods of heavy rain.
- Paving will increase the flow to this area.
- Often weeks pass before all water evaporates.

3. **The project should conform to Chapter 11, Housing of the Lana'i Community Plan**, updated in 2016 which reflects the opinion of the broad Lana'i community via several years of work by the Community Plan Advisory Committee and accepted by the Lana'i Planning Commission.

Fairfax (Pat) Reilly
468 Ahakea Street
P.O. Box 630111
Lanai City, HI 96763-0111
Email: kimchi508@outlook.com

4. The HOKUAU Project needs to address the needs of resident families working for Federal, State, County, healthcare, private businesses, non-profit organizations who have been preparing to purchase homes for years.
5. The County and Pulama conducted multiple community meetings which confirmed a desire to purchase a home was expressed.

May 17, 2021

Email: kimchi508@outlook.com

Fairfax (Pat) Reilly
468 Ahakea Street
P. O. Box 630111
Lānaʻi City, Hawaiʻi 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūāo 201H Housing Project at
TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City,
Hawaiʻi.

Dear Mr. Reilly:

Thank for your letter dated January 21, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lānaʻi (w/attachment)
Olivia Simpson, Pūlama Lānaʻi (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

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* In accordance with Hawaiʻi Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: 4.13 Air Quality, PP152+: DISAGREE:

Response 01:

Proximity to the Wastewater Treatment Plant ("WWTP")

Exhibit D and Section 4.13 Air Quality (starting on page 152) of the Draft Environmental Assessment ("DEA") includes an extensive discussion regarding the air quality impacts of the project area. A study by B.D. Neal & Associates, included as Exhibit D, described the methodology and findings of potential short and long term air quality impacts that could occur as a result of construction and use of the proposed development and suggested mitigation measures to reduce any potential air quality impacts where possible and appropriate. Potential impacts on the proposed development from the nearby wastewater treatment facility (aka WWTP) was also evaluated. The study utilized both national and state ambient air quality standards ("AAQS").¹

As detailed in Section 8 in Exhibit D, generally WWTPs are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds.² It is further stated that these types and compounds in the air are generally not considered hazardous to human health, but when they occur in high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses.

A study was conducted and described in Section 8. Hydrogen sulfide measurements were collected, there were no measurable hydrogen sulfide concentrations at any location along the plant perimeter. It was recommended by the consultant that it would be prudent for the proposed project to maintain a buffer distance at least 300 to 600 feet from the WWTP boundary.³ The Hōkūāo 201H Housing Project implemented the maximum recommendation buffer of 600 feet from the WWTP boundary (see **Figure 1**).



Figure 1: Dotted red line depicts the 600 foot setback line from the WWTP.

¹ National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations, while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1 in Exhibit D summarizes the standards.

² Exhibit D Section 8 Waste Water Treatment Plant

³ Exhibit D Section 9 Conclusions and Recommendations

Comment 02: 4.6 Geology, Soils & Drainage, PP82+: DISAGREE:

Response 02:

Exhibit G and Section 4.6 Geology, Soils & Drainage (starting on page 82) of the DEA includes an extensive discussion regarding the air quality impacts of the project area. A preliminary engineering report conducted by certified licensed engineers at R.M. Towill Corporation, included as Exhibit D, included a drainage report. Section 4.5 in Exhibit G, describes the estimated runoff, the proposed drainage system, erosion control measures, and impacts to regional drainage facilities.

The study concluded the following:

- Runoff generated by the project will remain tributary to the low sump area next to the waste water treatment facility. To provide storm water quality treatment, runoff will continue to be directed into the grassed swales or two large detention basins prior to discharge off the property.
- Proposed Drainage System (See **Figure 2**)
 - Consist of shallow cutoff swales between the new residential units and Fraser Avenue to capture as much runoff as possible and direct the flow around the project or into the new project drainage systems.
 - Roadway drains will be provided along the new roadways towards the proposed retention basins

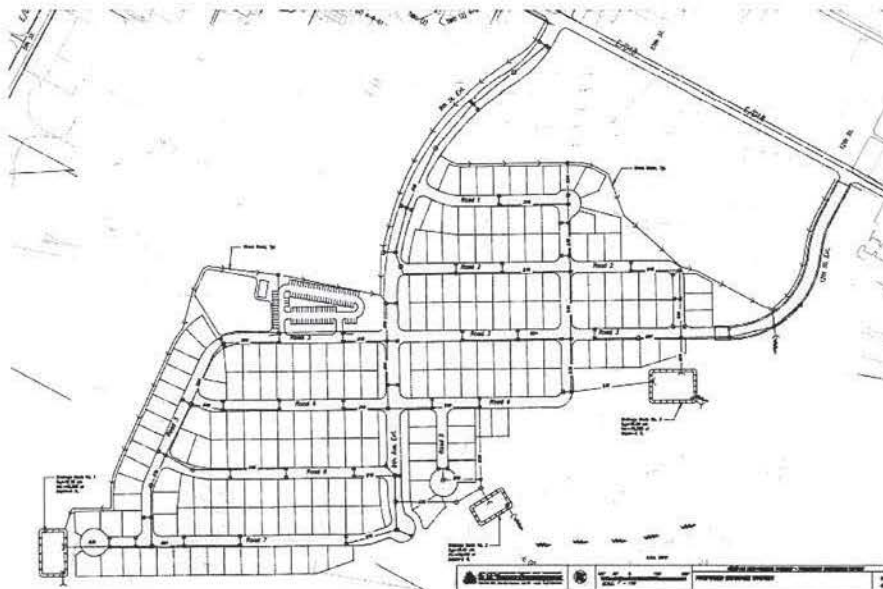


Figure 2: Proposed drainage system for the project

From: [STAN RUIDAS](#)
To: [director hhc](#); Gabe.Johnson@mauicounty.us
Subject: Environmental Assessment
Date: Friday, January 22, 2021 2:26:02 PM

January 21, 2021

To whom it may concern,

My name is Stan Ruidas. I am a lifetime resident of the island of Lanai and my family has been living here close to 100 years. I DO NOT SUPPORT the Hokuao housing project on the basis that it doesn't meet the criteria of public safety and health. I've been on numerous boards and commissions, and in planning this housing project we have to look at the history of the land. In this proposed housing development you will find that there was an open sewer plant, power plant, nursery, old pineapple fields, chemical storage areas, salvage yard, dumpsite and tons of buried vehicles and equipment.

This area is not suitable and safe for a housing project. There needs to be an independent deep soil testing protocol, up and not limited to five hundred feet. (examples - see page 806, DOH and page 638, TRC) Test sampling of only 5 feet is irresponsible. Archeological survey of 26 test pits at 115 CENTIMETERS is also insufficient, deep surveys up to and not limited to 100 FEET is necessary (see page 304). Air quality tests of ground emissions over a long period of time is also necessary to monitor gases that rise up through the layers of soil during the cooling and heating of the ground surfaces. The close proximity of the Maui County Wastewater Treatment Plant is also a large environmental hazard of an air pollutant. On a West to Southwest wind day, or even a still misty morning will bring a constant air of methane and other harmful gasses to the housing project. The engineering design of 600 feet is irresponsible.

It is a constant fact and daily reminder of Lanai's high rate of cancer, kidney problems, birth defects, miscarriages, ect...Department of Health and public records can verify this. As stewards of this land, we cannot let this project move forward in this location. Alternative sites would be on the Southwest area of Manele and Kaunalapau Highway or North of Olopua Woods and DHHL Hawaiian Homes.

In conclusion, we need Affordable Housing for Lanai residents and some Transient rental units. But this proposed location for Hokuao is definitely not in the confines of the Public's Health and Safety guidelines and laws. Mahalo and Aloha.

Respectfully Submitted,

Stanley Ruidas
352 Mahana Place
PO Box 631256
Lanai City, Hawaii 96763
damagicjuice@gmail.com
808-563-1125

May 17, 2021

Email: damaqicjuice@gmail.com

Stanley Ruidas
Lānaʻi Resident
352 Mahana Place
P. O. Box 631256
Lānaʻi City, Hawaiʻi 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Mr. Ruidas:

Thank for your letter dated January 21, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we are providing responses in the attached **Exhibit "A"**. The responses follow in the order of the comments in your letter.*

We appreciate your input and will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Attachment

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns (w/attachment)
Keiki-Pua Dancil, Pūlama Lānaʻi (w/attachment)
Olivia Simpson, Pūlama Lānaʻi (w/attachment)
Calvert Chipchase, Cades Schutte (w/attachment)
Molly Olds, Cades Schutte (w/attachment)

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* In accordance with Hawaiʻi Administrative Rules Chapter 11 section 200.1-20 subsections (c) and (d), 2, the rules require our responses to be provided in the Final EA. Further, per subsection (d), subpart (2), we are providing a separate and distinct response to your comment letter herein as Exhibit A. Of note, per subsection (c) we endeavored to respond to "substantive" comments, giving careful "...consideration to the validity, significance, and relevance of the comment to the scope, analysis, or process of the EA, bearing in mind the purpose of this chapter and chapter 343, HRS."

Comment 01: In this proposed housing development you will find that there was an open sewer plant, power plant, nursery, old pineapple fields, chemical storage areas, salvage yard, dumpsite and tons of buried vehicles and equipment. This area is not suitable and safe for a housing project. There needs to be an independent deep soil testing protocol, up and not limited to five hundred feet. (examples - see page 806, DOH and page 638, TRC) Test sampling of only 5 feet is irresponsible. (*sic*)

Response 01:

The applicant engaged consultants and experts with applicable certifications and professional degrees to conduct the studies included in the Draft EA ("DEA"). TRC completed the assessment and mitigation recommendations discussed extensively in section 4.4 starting on page 72 in the DEA. The applicant initiated work to remove and remediate soils that were determined to be contaminated in the area. The plan for the remediation work was prepared by a qualified consultant and approved by the State Department of Health, prior to proceeding with the work.

As stated on page 79 of the DEA, construction activities on the proposed project will not commence until the Removal Action Completion Report is accepted and approved, and the Hawaii Department of Health or other applicable regulatory authority has issued a No Further Action (NFA) letter or similar closure document.

Comment 02: Archeological survey of 26 test pits at 115 CENTIMETERS is also insufficient, deep surveys up to and not limited to 100 FEET is necessary (see page 304). (*sic*)

Response 02:

The applicant engaged consultants and experts with applicable certifications and professional degrees to conduct the studies included in the Draft EA ("DEA"). Honua Consulting completed the archaeological inventory survey and archaeological monitoring plan, per guidelines set forth by the State of Hawaii and guidance from the State Historic Preservation Archaeology Division ("SHPD"). This was discussed extensively in section 4.2 of the DEA and Exhibit A.

In particular, Exhibit A includes the letter from SHPD accepting the archaeological inventory survey ("AIS") report as specified by HAR § 13-276-5 and further requested an archaeological monitoring plan. The applicant has provided SHPD with the archaeological monitoring plan and is awaiting review and approval by SHPD.

Comment 03: Air quality tests of ground emissions over a long period of time is also necessary to monitor gases that rise up through the layers of soil during the cooling and heating of the ground surfaces. The close proximity of the Maui County Wastewater Treatment Plant is also a large environmental hazard of an air pollutant. On a West to Southwest wind day, or even a still misty morning will bring a constant air of methane and other harmful gasses to the housing project. The engineering design of 600 feet is irresponsible. (*sic*)

Response 03:

The applicant engaged consultants and experts with applicable certifications and professional degrees to conduct the studies included in the Draft EA ("DEA").

Proximity to the Wastewater Treatment Plant ("WWTP")

Exhibit D and Section 4.12 Air Quality (starting on page 152) of the DEA included an extensive discussion regarding the air quality impacts of the project area. A study by B.D. Neal & Associates, included as Exhibit D, described the methodology and findings of potential short and long term air quality impacts that could occur as a result of construction and use of the proposed development and suggested mitigation measures to reduce any potential air quality impacts where possible and appropriate. Potential impacts on the proposed development from the nearby wastewater treatment facility (aka WWTP) was also evaluated. The study utilized both national and state ambient air quality standards ("AAQS").¹

As detailed in Section 8 in Exhibit D, generally, WWTPs are not considered significant sources of air pollution, but they can result in the release of small amounts of airborne odorous compounds.² It is further stated that these types and compounds in the air are generally not considered hazardous to human health, but when they occur in high concentrations at offsite locations, they can be detected by smell and potentially constitute a nuisance for nearby residents and businesses.

A study was conducted and described in Section 8. Hydrogen sulfide measurements were collected and there were no measurable hydrogen sulfide concentrations at any location along the plant perimeter. It was recommended by the consultant that it would be prudent for the proposed project to maintain a buffer distance at least 300 to 600 feet from the WWTP boundary.³ The Hōkūāo 201H Housing Project implemented the maximum recommendation buffer of 600 feet from the WWTP boundary (see **Figure 1**).

Further stated on page 153 of the DEA, B. D. Neal & Associates concluded winds at the site can be expected to be predominantly trade winds from the northeast with speeds in the 10 to 25 mph range. The prevalent "fresh" winds could potentially promote volatilization at the plant, but they will also tend to enhance the dilution and dispersion of the emissions at downwind locations. With trade wind conditions, which occur about 80 percent of the time, emissions will be carried toward locations to the southwest. The proposed project will be situated to the northeast of the wastewater treatment facility and thus will be upwind most of the time.

¹ National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations, while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1 in Exhibit D summarizes the standards.

² Exhibit D Section 8 Waste Water Treatment Plant

³ Exhibit D Section 9 Conclusions and Recommendations

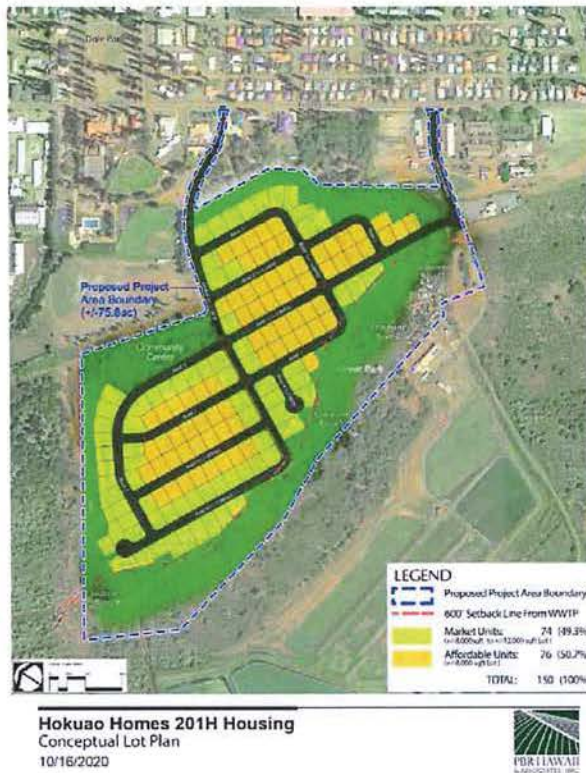


Figure1: Dotted red line depicts the 600 foot setback line from the WWTP.

Comment 04: It is a constant fact and daily reminder of Lanai’s high rate of cancer, kidney problems, birth defects, miscarriages, ect...Department of Health and public records can verify this. As stewards of this land, we cannot let this project move forward in this location. Alternative sites would be on the Southwest area of Manele and Kaunalapau Highway or North of Olopuia Woods and DHHL Hawaiian Homes. (*sic*)

Response 04:

As previously noted, a Phase 1 Environmental Site Assessment study was completed for the project area (Exhibit E of the DEA). The report analyzed the existing conditions of the project area and provided recommendations for remediation of the soils found to be contaminated in the area. The remediation plan was developed by the project consultant TRC and submitted to the DOH for review and approval. No construction activities would occur at the site until the DOH has reviewed and approved the final report on remediation work.

Site selection

The project location was selected due to the proximity to Lāna’i City (extension of the City) and community amenities (e.g., school, market, businesses, etc.). It is close enough that future residents of the Hōkūāo 201H Housing Project could walk to these establishments.

The other sites proposed as alternate locations for the project, (e.g., southwest area of Mānele and Kaunalapā’u Highway or North of Olopuia Woods and DHHL Hawaiian Homes) include similar former uses (e.g., pineapple fields) as the Hōkūāo 201H Housing Project.

Further, see responses to Comment 01 and 03, herein.

From: [Camille Kirk](#)
To: planning@mauicounty.gov planning
Subject: Hokuao Testimony
Date: Sunday, January 17, 2021 8:33:49 PM

To Whom it May Concern,

I am writing to express my concerns regarding the planned affordable rentals that have been proposed in Lanai City. It is unfortunate that the most recent project would not fit my family's goal of being able to invest in our future by being able to own a home. Please reconsider the rental project and allow this housing development to be rent to own or homes that families can purchase.

I appreciate your consideration in this matter.

Thank you,
Camille Kirk

May 17, 2021

Via Email: cammy808@hotmail.com

Camille Kirk
Lānaʻi Resident

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Ms. Kirk:

Thank for your letter dated January 17, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: [kaweka55](#)
To: planning@mauicounty.gov planning
Subject: Hokoau housing
Date: Monday, January 18, 2021 8:27:27 AM

Shelly preza, chair,
Appose
No sales not for none company workers.
Mahalo David Embrey

May 17, 2021

Via Email: kaweka54@gmail.com

Dave Embrey
Lānaʻi Resident

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Mr. Embrey:

Thank for your letter dated January 18, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: [kuniz kunimitsu](#)
To: [planning](#)
Subject: Testimony
Date: Monday, January 18, 2021 5:20:26 AM

Aloha,

Currently we are struggling dealing with the lack of opportunity to rent a home on lana'i. Specifically a 2 or 3 bedroom is seemingly impossible. Currently there are many local family's that are stuck living in a one bedroom home, including my family. I have been noticing that when homes open up for rental it's already reserved for someone who is not a resident on Lana'i. Understanding yes they save those for non resident because a company needs to fill a specific position and need to house them. We need more rentals! And we need more homes to own! I know for a fact we are all waiting and waiting for this to happen. This community needs homes for the community, not for non resident. There is a huge difference between the culture, the people that are here and now. Please hear me out my family needs a bigger place. It's 4 of us in a one bedroom apartment.

Mahalo!

May 17, 2021

Via Email: kuniz4lyph@gmail.com

Kuniz Kunimitsu
Lāna'i Resident

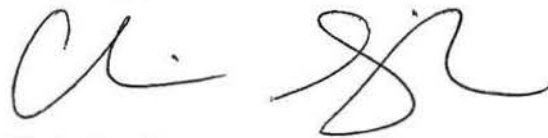
SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Ms. Kunimitsu:

Thank for your letter dated January 18, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we appreciate your letter of support to build additional affordable housing for the Lāna'i community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: [Maxine Figuerres](#)
To: [planning](#)
Subject: Hokuao 201H project
Date: Sunday, January 17, 2021 2:20:10 PM

To whom it may concern,

I am writing in regards to the Hokuao 201H Project here on Lana'i, and I can tell you straight forward, that myself, friends and family do not support this housing project that Pulama Lana'i is proposing.

Why would we be supporting something that doesn't quite benefit us long term residents?

Why would we anticipate and wait so long to invest and become homeowners so that our family will always have a place to come and call home to, but instead be under the control of renting from Pulama for the rest of our lives!

So what is the future of Lana'i?

Only the rich will be able to purchase homes and live here? Four Seasons and Pulama Lana'i will be bringing in their own people to run business? is that why only part of the housing project is affordable?

They will be housing their own special people?

Everyone was anticipating, planning and awaiting for the purchase of the affordable home project, what happened to it?

For the protection of my privacy I will not disclose my name but I will tell you that I am a third generation Lana'i born and have lived here all of my life.

May 17, 2021

Via Email: xima77@jcloud.com

Maxine Figuerres
Lānaʻi Resident

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Ms. Figuerres:

Thank for your letter dated January 17, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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FOUR SEASONS
RESORTS
LĀNA'I

January 18, 2021

Maui County Planning Department
planning@mauicounty.gov

Dear Councilmembers:

I am writing today in support of the proposed Hōkūao 201H Residential Project, which will provide affordable workforce housing for the residents in our community who choose to call Maui County home as they work, live and even raise families.

Please accept my testimony as a current Lāna'i City resident and General Manager of Four Seasons Resorts Lanai. Tourism is an integral part of Lāna'i's economy and our two properties - Four Seasons Resort Lāna'i and Sensei Lāna'i, A Four Seasons Resort - directly employ over 800 people, a significantly large segment of the local community. The vast majority of our workforce lives on Lāna'i. This number does not include the supporting elements of local business owners and tour operators that play an active role as ambassadors to everyone that visits our beautiful island as well as the many other members of the community that choose to make Lāna'i home.

It is vital for projects like this to move forward, so our residents, and those who would like the opportunity to live in the community, have access to a choice of available housing.

The proposed development would add 150 new single-family homes for lease with just over half the units set aside as affordable units, allowing for a variety of pricing options to accommodate a range of residents, no matter where they are on their life path. The additional elements of a Community center with parking, a park, and pocket parks along the south border will serve to enhance the overall project.

I thank you for the opportunity to share my perspective as you gather the viewpoints of the various stakeholders - from county officials, community members, neighborhood homeowner's associations, local business and immediate neighbors and know that we all are working towards making Maui County, our home, the best it can be for us all.

Once again, please accept this letter in support for the Hōkūao 201H Residential Project.

Alastair McAlpine

May 17, 2021

Alastair McAlpine, General Manager
Four Seasons Resorts Lana'i
P. O. Box 631380
Lāna'i City, Hawai'i 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. McAlpine:

Thank for your letter dated January 18, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we appreciate your letter of support to build additional affordable housing for the Lāna'i community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: Alberta de Jetley [<mailto:adejetley@gmail.com>]
Sent: Friday, January 22, 2021 8:13 PM
To: director.hcc@mauicounty.gov
Cc: Keiki-Pua Dancil <kdancil@pulamalanai.com>; PeterYoung@hookuleana.com
Subject: Affordable rental housing on Lana'i

Testimony for:

Lana'i Hokuao Affordable Housing Project

Dept. of Housing and Human Concerns
Director.hcc@mauicounty.gov.

Cc: Kdancil@pulamalanai.com
Cc: PeterYoung@hookuleana.com

Lana'i residents have been waiting for more than 30 years for an affordable housing project. Now that we are on the cusp of having a project built by Pulama Lana'i, Maui County is once again saying they are on the verge of building one. We have waited long enough! If Pulama Lana'i is able to move forward to build it now, they should receive the permits they need to proceed with it.

It would have been great if this project had houses that could be purchased by our island's residents. However, we are experiencing a severe shortage of rental units. People need clean, safe, and affordable rental units to live in NOW, not some time in the distance future.

I personally would have liked to see multi-family rental units similar to the Kanepu'u units with studio, one bedroom, and two-bedroom units. I would have also liked to see some three-bedroom, two bath units included. However, the lot size proposed for the Hokuao project will give tenants space to have a home garden and a bit more privacy than in a multi-family project such as Iwiolo.

Please help to make this project a reality. It may not be exactly what we want, but it definitely fill a great need for affordable rental housing in our community.

Alberta de Jetley, Private citizen
330 Fraser Avenue, Lana'i City, HI 96763
Email: adejetley@gmail.com ph. 808-649-0808

May 17, 2021

Alberta de Jetley
Lānaʻi Resident
330 Fraser Avenue
Lānaʻi City, Hawaiʻi 96763

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Ms. de Jetley:

Thank for your letter dated January 22, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your letter of support to build additional affordable housing for the Lānaʻi community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: Alice Granito <Alice_Granito@hotmail.com>
To: "planning@mauicounty.gov" <planning@mauicounty.gov>
Date: 1/20/2021 3:59 PM
Subject: Hokuao Affordable Rental Housing Development written testimony

To whom it may concern,

I am writing in support of the Hokuao Affordable Rental Housing Development project on Lanai.

My name is Alice Granito and I have been a resident of Lanai since 2003. I worked at the only licensed preschool on the island for 14 years. Currently, I work for the State of Hawaii - Child Welfare Services. When I first moved here, I was ok with living with my significant other and his family. As time went on, more family members joined the household. With 8 people, we live in an old plantation home with 1 bathroom. Usually this living situation is interesting to say the least, but during this pandemic it has been difficult living in a multi-generational home with one bathroom. We have all had to make extra sacrifices in order to care for everyone else in our household. With only one bathroom there is no option for isolation in the event anyone was to get sick.

During my time here I've applied for housing through Castle and Cooke and then Pulama Lanai at various times. The first time I applied, I was called for housing, but at the time I was unable to afford living expenses plus the higher rent on my own versus living at home. Most recently, I applied for housing with Pulama Lanai and my application was accepted. I waited two months for an answer before I was finally notified that they were unable to offer me housing. The notice also stated that Pulama Lanai was not accepting any applications until further notice. This was a letdown as it is difficult to live on your own here with limited resources for housing. Private rentals are expensive and limited as well.

Although it is a disappointment that this project would not be offering homes for sale, it is great to know that units will be available for rent. This will ease stress to families living in multi-generational and multi-family homes. I personally look forward to having the option to move into a single-family home on my own.

Thank you,
Alice Granito

May 17, 2021

Via Email: Alice Granito@hotmail.com

Alice Granito
Lāna'i Resident

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Ms. Granito:

Thank for your letter dated January 20, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we appreciate your letter of support to build additional affordable housing for the Lāna'i community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
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Molly Olds, Cades Schutte

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From: [Jon Dillehay](#)
To: planning@mauicounty.gov planning
Subject: Hokuao housing project Written Testimony
Date: Tuesday, January 19, 2021 12:19:39 PM

To whom it may concern,

I am writing in support of the Hokuao housing project for Lana'i. I have lived and worked on Lana'i since May 2018 in the pursuit of food security. In my humble opinion, housing availability has been one of the most significantly limiting factors in respect to the growth and development goals of the island. I believe a project such as this one is necessary to incentivize the return of folks born Lana'i and the retention of experienced labor.

Hawaii, as a state, imports far more food than is produced locally. Sustainable, reliable, local food production is critical in reducing this dependence, and Lana'i has the potential to contribute greatly to that effort.

Additionally, taking property values into consideration, renting is the only viable housing option (at least for people in situations similar to mine). Buying a house is well out of budget, so availability of rentals is critical. For these reasons, I think the Hokuao housing project is the correct step forward and is very important.

Thank you for your time,
Jon Dillehay

May 17, 2021

Via Email: jon@sensei.aq

Jon Dillehay
Sensei Farms

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Mr. Dillehay:

Thank for your letter dated January 19, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your letter of support to build additional affordable housing for the Lānaʻi community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: Larry Nixon [<mailto:larry@sensei.ag>]

Sent: Friday, January 15, 2021 4:47 PM

To: planning@mauicounty.gov

Subject: Hōkūao 201H Housing Project

All,

I appreciate the opportunity to offer my excitement over this housing project here on Lanai. As somebody who has dreamt of living and farming on Lanai for some time, it is nice to see affordable housing that is new and unique, coming to the island. As a mid-size group of greenhouses, we are hiring mostly young locals from Lanai, it is nice to know there are homes for them to start their lives in! Sensei stands on food security, building people and securing futures, and this project speaks to that. I was so impressed with the park space, and even the look of each house, it just looks like Lanai. While having only lived here less than a year, I have wanted to be on Lanai half my life, I am careful with how this land is treated in and around the greenhouses, and I know this project will do the same. Be blessed and confident in your support for this wonderful opportunity for all of Lanai. Stay Safe.

Larry Nixon
General Manager

Cell: 808.853.0065 | Office: 808.999.8716

larry@sensei.ag

<http://www.sensei.ag/>

May 17, 2021

Via Email: larry@sensei.aq

Larry Nixon, General Manager
Sensei Farms

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Mr. Nixon:

Thank for your letter dated January 15, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your letter of support to build additional affordable housing for the Lānaʻi community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
Calvert Chipchase, Cades Schutte
Molly Olds, Cades Schutte

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From: Rama Di Luzio [<mailto:rama@sensei.ag>]
Sent: Monday, January 18, 2021 11:53 AM
To: planning@mauicounty.gov
Cc: Leinani Zablan <lzablan@pulamalanai.com>
Subject: Hōkūao 201H Housing Project

Dear Maui County Planning Department,

I am writing to show my support for the Hokuao 201H Housing Project.

I had recently moved to Lanai and I am aware of the lack of affordable housing. I believe this project will bring a lot of growth and jobs for the islanders.

Thank you in advance.

Yours truly,

Rama Di Luzio
Assistant Grower

808.379.6637 | rama@sensei.ag
<http://www.sensei.ag/>

SENSEI Ag

May 17, 2021

Via Email: rama@sensei.ag

Rama Di Luzio, Assistant Grower
Sensei Farms

SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lānaʻi City, Hawaiʻi.

Dear Ms. Di Luzio:

Thank for your letter dated January 18, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawaiʻi limited liability company doing business as Pūlama Lānaʻi, we appreciate your letter of support to build additional affordable housing for the Lānaʻi community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lānaʻi
Olivia Simpson, Pūlama Lānaʻi
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Molly Olds, Cades Schutte

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From: [Scott Ashworth](#)
To: planning@mauicounty.gov planning
Subject: Hokuao 201H Housing Project
Date: Monday, January 18, 2021 9:29:42 AM

Good morning,

I am writing this note to show support for the Hokuao 201H Housing project. We are in desperate need of more housing on Lanai for our current residents as well as future residents. With the two Resorts being the main economic engine on Lanai, we need new, affordable housing for our future employees and to ensure the continued success of the Resorts here on Lanai.

Please support this important Project.

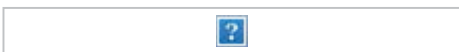
Mahalo,
Scott

Scott Ashworth, PGA
Director of Golf

Four Seasons Resorts Lanai
One Manele Bay Road, Lanai City, Hawaii

Voice: (808) 565-2225
scott.ashworth@fourseasons.com
<https://fourseasons.com/lanai>

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Elevate your experience. Travel via Oahu on [Lanai Air](#) included with all qualifying reservations made by December 15, completed by June 30, 2021.

May 17, 2021

Via Email: scott.ashworth@fourseasons.com

Scott Ashworth, Director of Golf
Four Seasons Resorts Lana'i

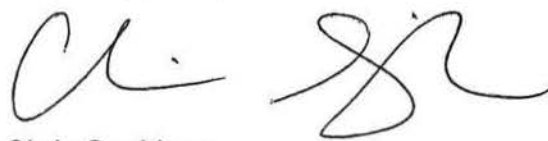
SUBJECT: Draft Environmental Assessment for proposed Hōkūao 201H Housing Project at TMKs (2)4-9-002:061 (POR.), (2)4-9-014:001 (POR.) and 009 (POR.), Lāna'i City, Hawai'i.

Dear Mr. Ashworth:

Thank for your letter dated January 18, 2021, on the subject project. On behalf of Lanai Resorts, LLC, a Hawai'i limited liability company doing business as Pūlama Lāna'i, we appreciate your letter of support to build additional affordable housing for the Lāna'i community.

Mahalo for your input and we will include a copy of your comment letter and this response in the Final Environmental Assessment (FEA). Should you have any questions or require further information regarding the proposed action, please contact me at (808) 244-2015, extension 221.

Very truly yours,



Chris Sugidono
Senior Associate

CEJS:ab

Cc: Buddy Almeida, County of Maui, Department of Housing and Human Concerns
Keiki-Pua Dancil, Pūlama Lāna'i
Olivia Simpson, Pūlama Lāna'i
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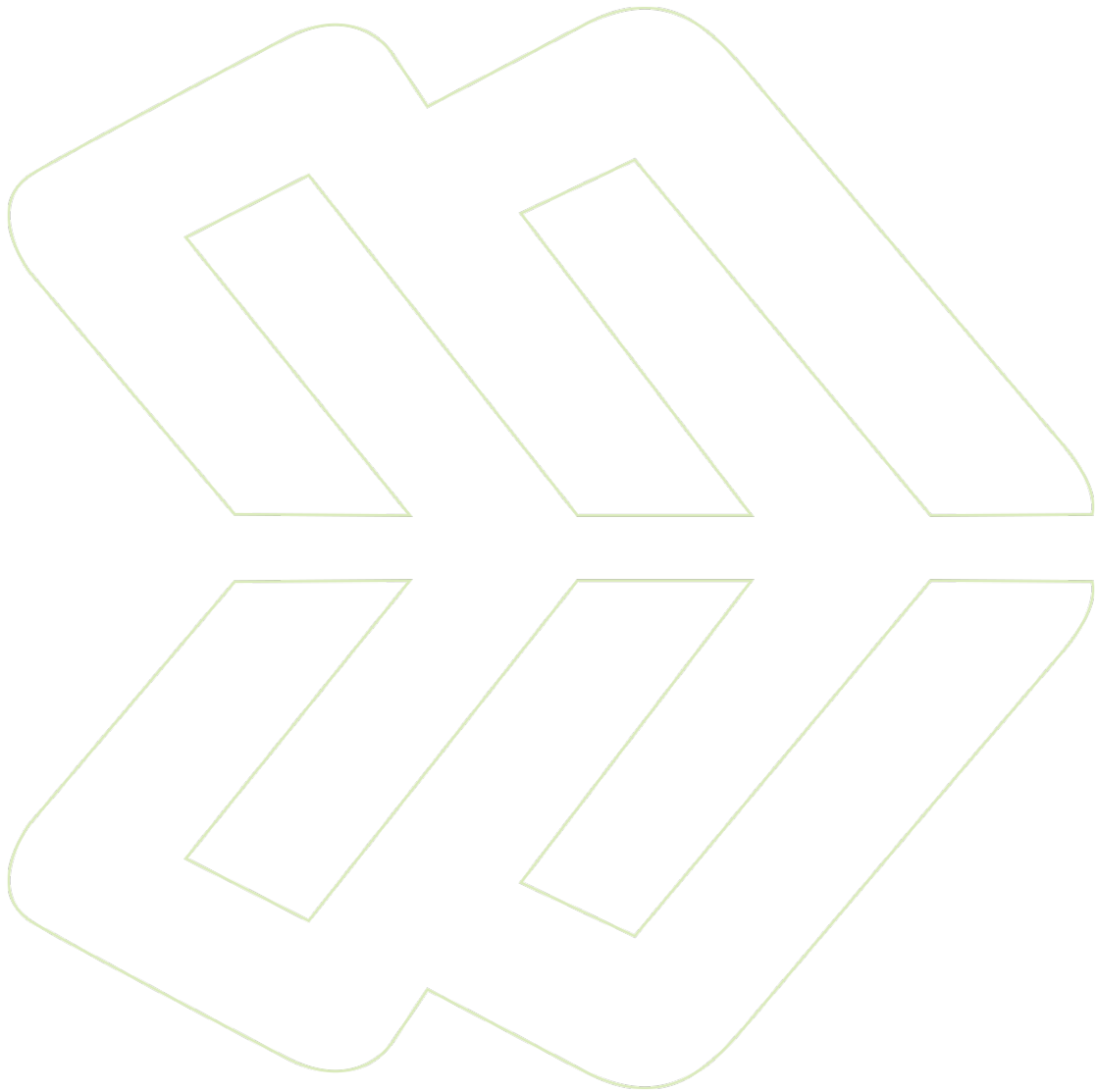
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MUNEKIYO HIRAGA

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