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Final Supplemental
Environmental Impact Statement

Makena-Keoneoio Road
Cul-de-sacs Plan
Makena, Island of Maui, Hawaii

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Seibu Hawaii, Inc.

June 1988

FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE
MAKENA-KEONEOIO ROAD
CUL-DE-SACS PLAN
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Makena, Maui, Hawaii
June 1988

Submitted Pursuant to Chapter 343, Hawaii Revised Statutes,
Environmental Impact Statement Regulations


F. J. Rodriguez, President
Environmental Communications, Inc.

Environmental Consultants for
Seibu Hawaii, Inc.

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CORRECTION

THE PRECEDING DOCUMENT(S) HAS
BEEN REPHOTOGRAPHED TO ASSURE
LEGIBILITY
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- A Archaeological Reconnaissance Survey of the Makena Road South Cul-De-Sac Area and the Old Makena School Site Makena, Maluaka, Makawao, Maui Island, TMK:2-1-05: 84 and por. 86 - Bishop Museum
- B Bishop Museum Letter of February 19, 1988 Re: Summary of Archaeological Sensitivity in the Proposed Beach Access No. 3 Area

I. SUMMARY

CHAPTER 343, HRS
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Action: Applicant

Project Name: Makena-Keoneoio Road Cul-de-sacs Plan

Project Description: The County of Maui Planning Commission has determined that a Supplemental Environmental Impact Statement is required for the Makena-Keoneoio Road Cul-de-sacs Plan. The Commission's determination; based on Subchapter 10 of Chapter 200, Title 11, Environmental Impact Statement Rules, declared that the subject action had changed significantly in scope from the previous planned improvements described in the Final Environmental Impact Statement for the Makena Keoneoio Road Cul-de-sacs Plan dated February 1987. Further, the addition of these improvements make the preparation of a Supplemental EIS necessary.

The proposed action consists of the construction of two (2) permanent cul-de-sacs, at the north and south ends of the Makena-Keoneoio road parcel, planned for closure comprised of an asphalt turn around surface and concrete curbs, along with the provision of thirty (30) paved and marked parking stalls on a portion of TMK: 2-1-05:84 south of the south cul-de-sac. The Applicant's property makai of the roadway

improvements to some existing features and will include some grading, but would not involve extensive cutting or grading within the existing sand dune area.

Existing roadways between Honoiki Street and the north cul-de-sac, and the south cul-de-sac to Makena Alanui will be widened and improved to Maui County Subdivision access road standards. The Honoiki Street to north cul-de-sac section will include approximately 2,110 feet of roadway and 800 feet of concrete sidewalk while the south cul-de-sac to Makena Alanui section will involve approximately 1,190 feet of road and 280 feet of concrete sidewalk.

Between these cul-de-sacs, for a length of 1,100 feet, a 20 foot stone-paved walkway is proposed to lie within the boundaries of the existing Makena-Keoneoio Road. A low lava rubble wall will define the boundary of the walkway on either side. The walkway area will be regraded, in order to promote positive water drainage and to mitigate current ponding in the north area.

A mauka-makai walkway will be located between the hotel and the shoreline. The concrete walk will be approximately 5 feet wide, and is intended to control pedestrian traffic over the sand dune and to help prevent erosion of the dune. A beach activities shelter will also be located along the walkway.

A public beach access near the south cul-de-sac will include a public comfort station, shower, picnic tables, and trash receptacles.

Project Location: Makena, Makawao District, Island of Maui
(Figure 1).

Tax Map Keys: 2-1-05: 84 and 86
2-1-06: 56, 57, and 59
2-1-06: Lot 1-B

Land Owners: Seibu Hawaii, Inc., Seibu Tetsudo K.K.
County of Maui

**State Land Use
Designation:** Urban

**Maui County Plan
Designation:** Hotel, Public, Open Space, and Cul-de-sac

Applicant: Seibu Hawaii, Inc.

Agent: Mr. Eric. T. Maehara, Esq.; Foley, Maehara,
Judge, and Nip for Seibu, Hawaii, Inc.

Accepting Authority: Planning Department and Mayor
County of Maui
200 S. High Street
Wailuku, Maui, Hawaii 96793

Prepared By: Environmental Communications, Inc.

**Summary of Impacts
and Mitigation:** No geological, soils or climatic impacts are
expected to occur as a result of the proposed
project. Topographic alterations will be

limited to construction of the cul-de-sacs roadway improvements and landscaping. Hydrological impacts will be improved by the grading plan which will help stabilize the sand dunes and improve drainage. No rare or endangered species of flora and fauna are expected to be impacted by the action.

Archaeological and cultural-historic studies, including subsurface investigations, have been undertaken for the proposed action in the makai road parcel. No evidence of any significant archaeological resource has been found in the area. If during any construction work within the area, further evidence is found, the normal practice of halting work and contacting the State Historic Preservation Office of the State Department of Land and Natural Resources will be complied with.

Alternatives
Considered:

The proposed alternative will result in the implementation of the subject action as previously described. The proposed alternative is preferred to the previous land improvements and alternatives described in the February 1987 EIS since it offers a comprehensive plan which integrates the cul-de-sacs, parking, pedestrian walkway, landscaping, and appurtenant improvements to the existing Maui Prince complex, while maintaining and enhancing the historical integrity of the site.

A no action alternative would result in the subject parcel remaining in its present unimproved state. This alternative is undesirable because it would result in continued limited makai access and would not be mutually beneficial to future users of the area.

Plans, Policies,
Permits:

The proposed project is consistent with State Land Use, Community Plan and County Zoning designations for the project site. A Special Management Area (SMA) Use Permit and a Shoreline Setback Approval will be required for the project.

II. PURPOSE

The original purpose of the proposed action is to terminate a 1,100' portions of the Makena-Keoneoio Road between the two (2) proposed cul-de-sacs. That segment of the road is presently privately owned by the landowner adjoining both sides of said road. The closure of the road would provide the landowner contiguity of property and the Maui Prince Hotel direct physical and visual access to the shoreline.

The County of Maui Planning Commission has determined that a Supplemental Environmental Impact Statement is required for the Makena-Keoneoio Road Cul-de-sacs Plan. The Commission's determination; based on Subchapter 10 of Chapter 200, Title 11, Environmental Impact Statement Rules, declared that the subject action had changed significantly in scope from the previous planned improvements described in the Final EIS of February 1987. Further, the addition of these improvements make the preparation of a Supplemental EIS necessary.

III. PROJECT DESCRIPTION AND STATEMENT OF OBJECTIVES

A. Project Location

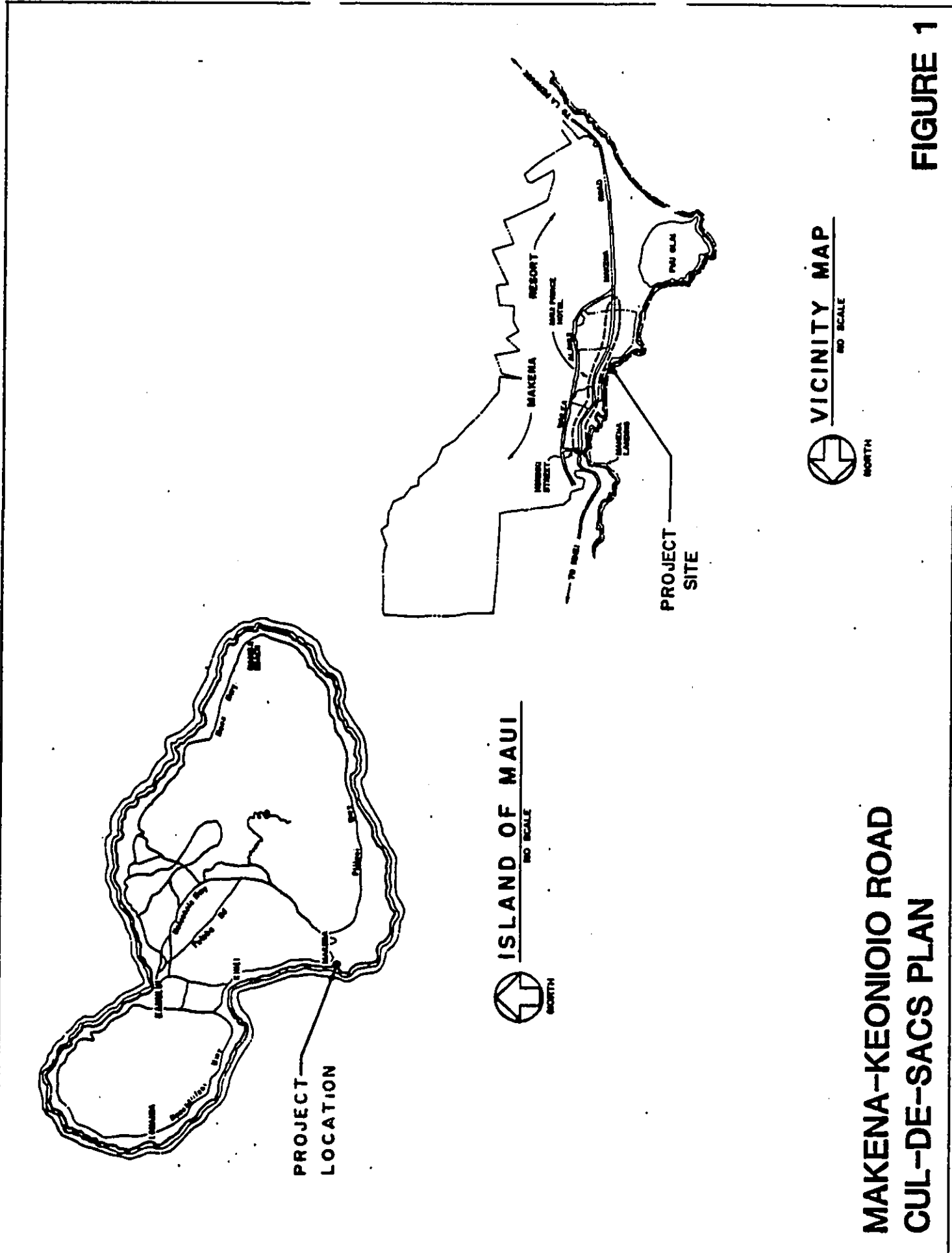
The proposed project is located on a portion of the original Makena-Keoneoio Road which is located in Makena, Maui (Figure 1 & 2). This parcel which was formerly owned by the County of Maui, has been transferred to the applicant. The site lies directly makai (west) of the Maui Prince Hotel.

The project is identified by the following tax map keys:

1. TMK 2-1-06:56, 57, and 59 (formerly a portion of TMK 2-1-06:59) - Proposed footpath from makai road parcel to shoreline landscape planting, beach activities center, and public beach access.
2. TMK 2-1-05:86 (formerly a portion of TMK 2-1-08:80) - Portion of the proposed north cul-de-sac;
3. TMK 2-1-06:56 (formerly a portion of TMK 2-1-06:59) - Portion of the proposed south cul-de-sac;
4. Makena-Keoneoio Road right-of-way - Proposed north cul-de-sac (portion) and south cul-de-sac (portion);
5. TMK 2-1-05:84 thirty (30) paved public parking stalls;
6. TMK 2-1-06: Lot 1-B of the Seibu Makena Hotel Subdivision (File No. 2.1582) (also referred to as the "makai road parcel") - Proposed stone paved walkway.

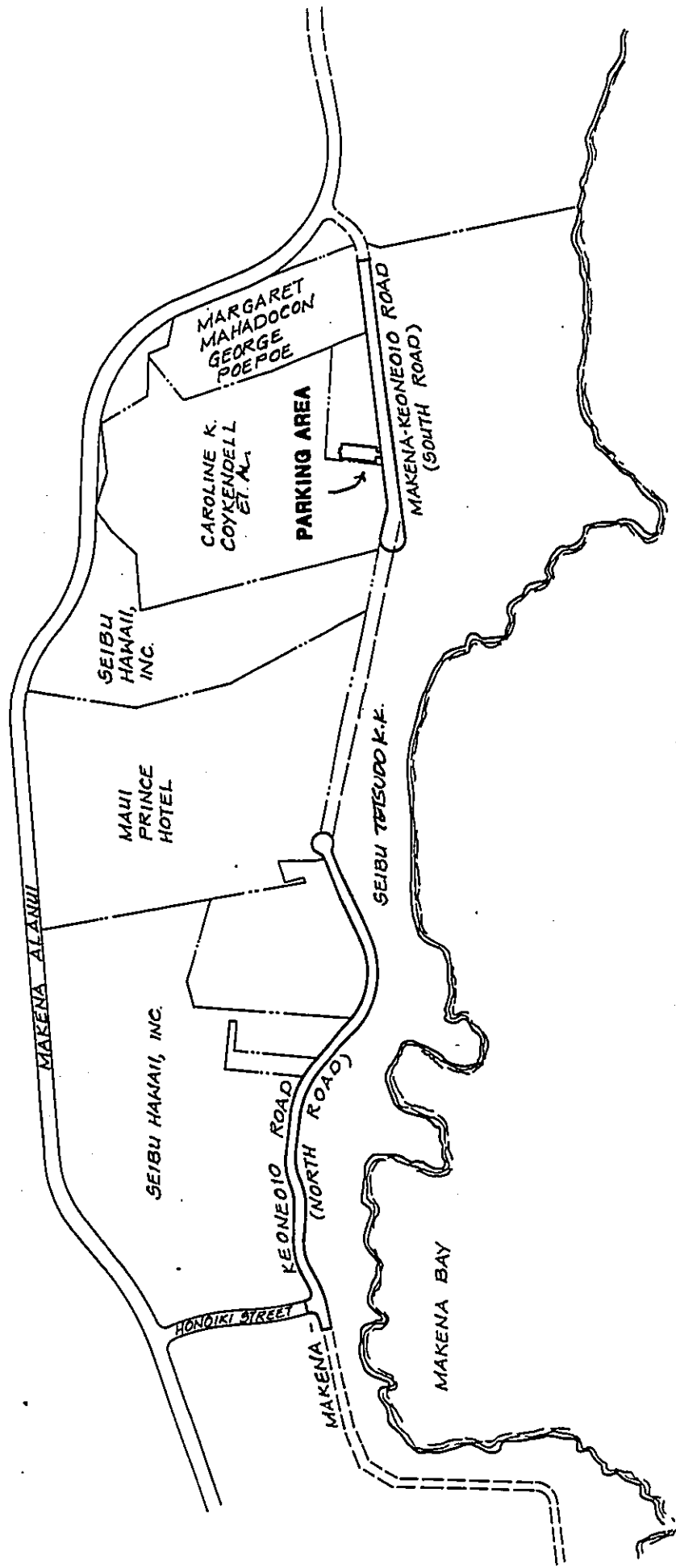
Ownership of the subject parcels are, as follows:

1. TMK 2-1-06:56, 57 and 59 - Seibu Hawaii, Inc.



**MAKENA-KEONIOIO ROAD
CUL-DE-SACS PLAN**

FIGURE 1



GENERAL SITE PLAN



**MAKENA-KEONIOIO ROAD
GENERAL SITE PLAN**

FIGURE 2

2. TMK 2-1-05:86 - Seibu Hawaii, Inc.
3. Makena-Keoneoio Road - County of Maui
4. TMK 2-1-06: Lot 1-B (makai road parcel) - Seibu Hawaii, Inc.
5. TMK 2-1-05:84 Seibu Hawaii, Inc.

The proposed action will take place on both private and public lands. A portion of the north cul-de-sac will be constructed on TMK: 2-1-05:86, owned by the applicant. The remainder of the north cul-de-sac will be constructed within the Makena-Keoneoio Road public right-of-way. A portion of the south cul-de-sac will be constructed on TMK: 2-1-06:56, owned by the applicant. The remainder of the south cul-de-sac will be constructed within the Makena-Keoneoio Road public right-of-way. Grading and landscape work on the makai road parcel will be done on lands owned by the applicant.

B. Technical Characteristics

The proposed action, which is the subject of this supplemental environmental impact statement, differs from the action proposed in the Makena-Keoneoio Road Cul-de-sacs Plan Final EIS of February 1987 in several details but not in general concept. The project consists of the closure of 1,100 feet of the Makena-Keoneoio Road fronting the Maui Prince Hotel with cul-de-sacs and parking near the termini. Paving of the closed portion of the Makena-Keoneoio Road is also a retained feature from the original Cul-de-sacs Plan (Figure 3).

A comparison of features from the original Cul-de-sacs Plan and the revised plan are presented below.

Former Proposal:

1. North cul-de-sac with 35' radius, concrete curb, and 20' wide roadway extended north approximately 127' to connect to existing road.

2. South cul-de-sac with 35' radius, concrete curb, and 24' wide roadway extended south approximately 120' to connect to existing road. Adjacent to south of cul-de-sac, 10 paved parking stalls on makai side of road.

Present Proposal:

1. North cul-de-sac with 45' radius, concrete curb and gutter, 5' wide concrete sidewalk, 24' wide roadway extended north approximately 2,110 feet to Honoiki Street, and 5' wide concrete sidewalk extended north approximately 800 feet to public restrooms and parking lot. Center of cul-de-sac designed as planter with 25' radius and cul-de-sac has been shifted slightly makai to accommodate larger radius and planter area. Roadway improvements from cul-de-sac to Honoiki Street will result in contiguous improvements to the Makena Alanui.

2. South cul-de-sac with 42' radius, concrete curb and gutter, 4' wide sidewalk, 24' roadway extended south approximately 1,190 feet to meet Makena Alanui roadway improvement, and 4' wide sidewalk extended approximately 280 feet south to proposed public parking lot. Ten paved parking stalls, adjacent to south cul-de-sac deleted, and in lieu 30 paved public parking stalls provided

on TMK 2-1-05: 84. Parking area provided on landowner's property closest to hotel district. A 12' X 75' loading/unloading zone provided at the cul-de-sac. Approximately 3300 sq. ft. planter area provided in the center of cul-de-sac.

3. Terminated portion of roadway approximately 1100' long, graded, filled, landscaped, and incorporated into Maui Prince Hotel grounds. Lawn grass to cover road parcel.

3. Between these cul-de-sacs, for a length of approximately 1,100 lineal feet, a 20 foot wide stone-paved walkway corridor for public use is proposed to replace this section of the existing Makena-Keoneoio Road. Low lava rock walls, approximately 10" to 12" high and 24" wide, will be constructed with hidden mortared joints and centered on the side boundaries of this 20 foot wide public pedestrian accessway. Wood posts will be installed at both ends of the walkway corridor to restrict vehicular access. A 12 foot wide concrete paved trail with a simulated stone surface will be constructed down the middle of the walkway corridor. The remainder of the walking area will be a surface layer of natural

volcanic cinders or small-size lava rocks, approximately 3 feet in width on both sides of the concrete paved trail. Informational signs and plaques about the stone-paved walkway will be installed within the walkway corridor.

The walkway corridor will be regraded with a 2% slope to promote positive surface water drainage and to alleviate the current ponding problem at the north area. Drainage inlets and dry well will be added to dispose of excess water run-off in this area.

4. The proposed foot-path was to be situated a minimum of 20 feet mauka of the shoreline (vegetation line) and measure 6-feet in width and approximately 1,300 feet in length. The footpath was situated within the County's Special Management Area. The proposed construction of the footpath involved limited grading work upon the sand dune situated between the shoreline and a makai road parcel.

4. The 6-foot wide beach walkway has been eliminated in favor of a new beach access plan which would utilize the existing north beach drop-off point and a revised south end access plan.

At the south end of the beach-side property which has been designated for public beach access and use, the area will be landscaped and a public comfort station with cesspool will be constructed to County of Maui standards

approximately 150 feet from the certified shoreline. A shower will be located nearby, as well as picnic tables and trash receptacles. A 5 foot wide concrete walk will connect the comfort station with the 20 foot wide stone-paved walkway and the beach. A low rock wall will be constructed to define the southern boundary of the public access property. An existing concrete slab will be retained and safety improvements will be made, including a safety railing along the makai edge and the repair of existing steps that allow access to the beach.

The area makai of the walkway corridor and mauka of the certified shoreline will be landscaped and maintained as hotel property for hotel guest use.

5. The applicant's property makai of the roadway landscaped. Landscaping along the beach walkway would consist of the infill planting of shrubs and

5. Existing trees, consisting primarily of kiawe trees and coconut palms, will be retained throughout the sand dune with additional coconut palms and coastal trees being

ground cover similar to existing vegetation in the area (e.g. naupaka; beach morning glory) between the shoreline and proposed beach walkway. This landscape planting work is situated within the minimum 20-foot shoreline setback area applicable to the parcel. The remainder of the sand dune would be maintained with lawn grass and existing kiawe trees, some of which would be selectively thinned.

planted, such as hala, wili-wili, kou and milo. Existing undesirable grasses and weeds will be cleared and replaced with common bermuda grass and groundcovers such as iceplant, beach morning glory, and beach naupaka.

Underground water pipes will be installed to service an automatic irrigation system for the sand dune landscape areas.

Other related improvements to stabilize and prevent erosion of the sand dune and to ensure pedestrian safety may be implemented as necessary.

At an elevation of approximately 22 feet, a wood frame beach activities shelter will be constructed on a concrete foundation. This shelter of approximately 250 square feet will house ocean related equipment for use by hotel guests, including water safety equipment, snorkeling gear, towels, umbrellas and related sundries. Nearby, a special activities gathering area will

be constructed of natural stone mortared to a below-grade concrete slab.

Connecting to the existing hotel walk near the pool deck will be a concrete walk, approximately 5 feet wide. This extension of the hotel walk will traverse the sand dune to the limit of the certified shoreline, to direct pedestrian traffic over the sand dune and to help prevent erosion of the dune. The hotel walk and lawn areas on the sand dune will be illuminated at night by low profile, low-level walkway lights, garden area lights and luau torches which will provide for the pedestrian safety of hotel guests. Underground electrical lines will service both low-level and safety area lights. An underground propane gas line will supply the torches with fuel.

C. Statement of Objectives

1. To implement the masterplan for the Makena Resort and provisions of the adopted Kihei Community Plan, pursuant to Ordinance No. 1490/Bill No. 85 (1984), and its predecessor Kihei-Makena Development Plan, relative to the

closure of a section of the former Makena-Keoneoio Road fronting the Maui Prince Hotel and;

2. To provide public access to the shoreline and beach resources of the area.
3. To maintain a contiguous area in continuity with the existing Maui Prince Hotel site and the shoreline.
4. To implement a culturally acceptable and historically compatible physical plan prepared in coordination with the Hui Alanui O Makena.

D. Funding and Phasing

The total cost of the proposed action is approximately \$1,236,500, all of which will be assumed by the developer. This figure consists of \$393,000 for hardscape and structures, \$57,000 for landscaping, \$125,000 for miscellaneous accessories, \$57,500 for contingency use, and \$604,000 for roadway improvements. The proposed improvements will not involve the use of county funds. The proposed project will be constructed in one (1) continuous phase with an estimated completion time of 180 days.

E. Historical and Archaeological Characteristics

The State Parks Administrator has indicated that the makai road parcel does not occur on historic properties that are listed on the Hawaii Register or the National Register of Historic Places, nor has it been deemed eligible for inclusion on the National Register of Historic Places.

The Hui Alanui O Makena has stated that the Makena-Keoneoio Road has evolved from the Piilani Trail built in the sixteenth

century and provides continuous access along the entire Makena coastline. The applicant has acknowledged this position and has subsequently submitted the proposed action which after review and discussion with the Hui Alanui O Makena, addresses its' concerns and needs.

IV. ALTERNATIVES CONSIDERED

1. Proposed Alternative

The proposed alternative would result in the implementation of the subject action as previously described. The proposed alternative is preferred since it offers a comprehensive plan which integrates the cul-de-sacs, parking, pedestrian walkway, landscaping, and appurtenant improvements to the existing Maui Prince complex. It should be noted that the final design of the proposed alternative has been developed with input and consultation from the Hui Alanui O Makena in acknowledgement of the Hui's position regarding the cultural integrity of the historic Piilani Trail.

2. Previous Makena Keoneoio Road Cul-de-sacs Plan

The previously proposed action described in the February 1987 EIS consisted of the closure of 1,100 feet of the Makena-Keoneoio Road and the construction of two (2) permanent cul-de-sacs at the north and south ends of the makai road parcel. These cul-de-sacs were comprised of an asphalt turn around surface and concrete curbs, along with the provision of ten (10) paved and marked parking stalls in the public right-of-way immediately adjacent to the south cul-de-sac. The makai road parcel itself was to be graded and landscaped. Further, a pedestrian footpath on the Applicant's property along the shoreline was planned to connect the two (2) cul-de-sacs. The footpath was six feet in width and approximately 1,300 feet in length.

This action as previously planned, has been improved upon in the current Cul-de-sacs Plan. Salient changes include the elimination of the shoreline walk, the increased number of parking stalls near the south cul-de-sac, provision of a public beach access, and improvements to Makena-Keoneoio Road from cul-de-sacs to the

Makena Alanui. Subsequently, the original cul-de-sacs plan has been replaced with the subject proposal.

3. Alternatives Previously Discussed

Several alternatives were evaluated and rejected in favor of the project described in the EIS of February 1987. These alternatives included: a pedestrian overpass; an underground tunnel; a 56-foot right-of-way which would lower the Makena-Keoneoio road below grade; a pedestrian underpass; a cobble stone roadway with sidewalks; and an improved roadway with pedestrian crossing signals.

4. No Action Alternative

This action would result in the subject parcel remaining in its present unimproved state. This alternative is undesirable because it would result in continued limited makai access and would not be mutually beneficial to future users of the area.

V. THE ENVIRONMENTAL SETTING

A. Geographical Characteristics

1. Topography

The site of the proposed two (2) cul-de-sacs, public beach access and public beach parking is situated on relatively flat land with gradual slope changes on the southern end of the area. The north cul-de-sac is approximately 4 feet above mean sea level while the south cul-de-sac is approximately 45 feet above mean sea level.

The existing Makena-Keoneoio Road is cut into the mauka side of the large sand dune that ranges in height from 1 to 30 feet above mean sea level. The makai side of the dune slopes down to a coral sand beach; the mauka side slopes down to the road at a maximum slope of 20 to 25 degrees. Existing vegetation consists of large kiawe trees and shrubs and weeds. This sand dune serves to stabilize the beach area and is prone to erosion during periods of high surf conditions.

2. Geology

The project site is situated near the southwestern rift zone of Haleakala and contains volcanic rocks and substrate of the Hana Volcanic Series which were produced by prehistoric aa and pahoehoe flows of basalt, picritic basalt, basaltic andesite and andesite (Stearns, 1946). Similar to other recent lava flows, the aa and pahoehoe substrate is relatively permeable.

3. Soils

There are two soil types in the project site (Soil Conservation Service, 1972). Along the shore, the soil type is identified as beaches; inland from the beaches, the soil is classified as Makena loam, stony complex, 3 to 15 percent slopes (MXC). The MXC soil type is described as having moderately rapid permeability (2.0 to 6.3 inches per hour) and high erodibility. The soil serves as good topsoil; however, it is not highly conducive for development purposes because of its erodibility and poor compaction characteristics.

4. Climate

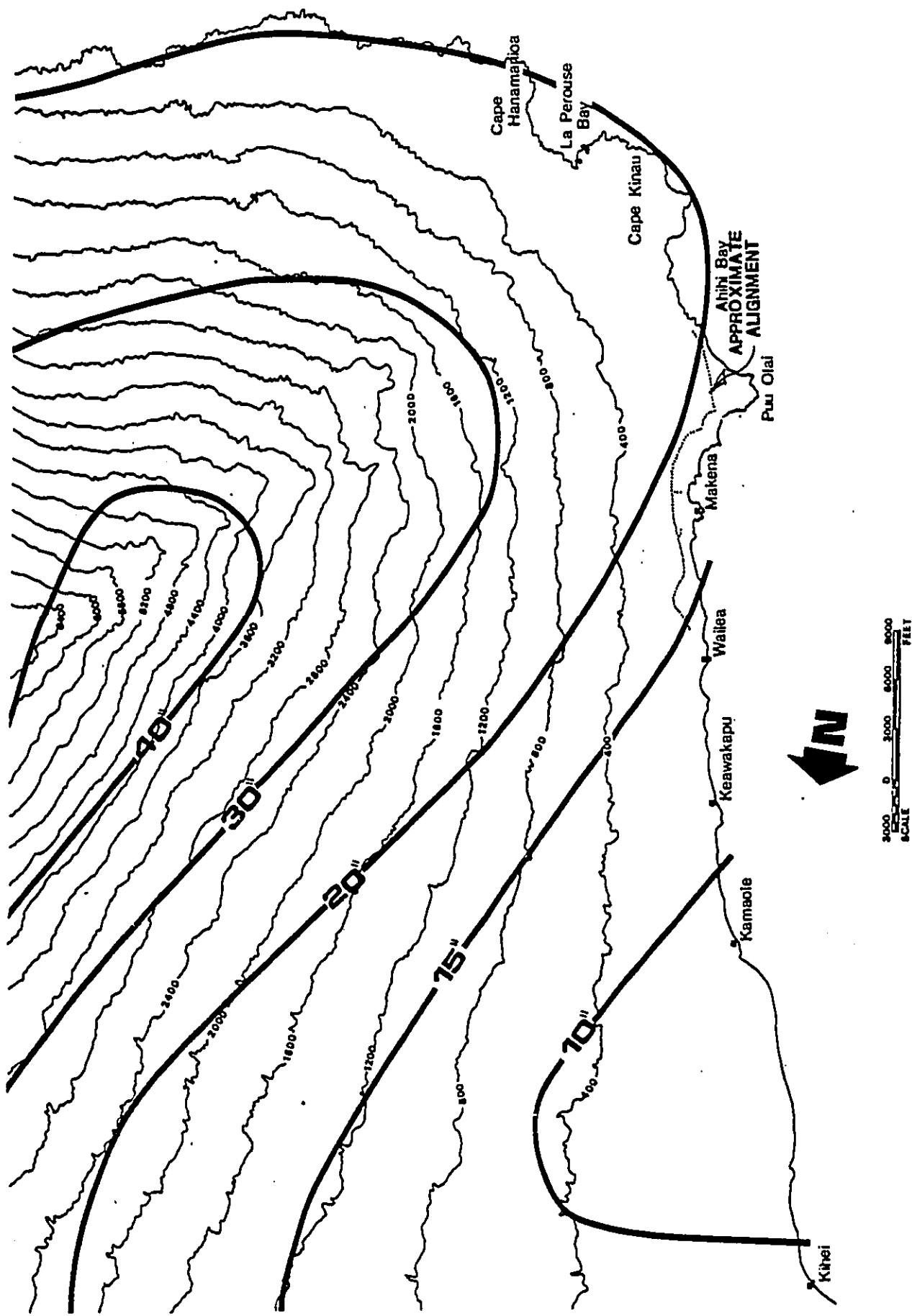
The rainfall along the Makena shoreline average from 10 to 30 inches per year (Figure 4), with the greatest amount of rainfall occurring from the months of November through January.

The mean annual temperature for Maui near sea level, applicable to the site is 72° to 75° Fahrenheit. Seasonal variation is approximately 5° to 8° different between the warmer months of August and September and the cooler months of January to March. The wind direction is predominantly from the northeast quadrant (Figure 5). With the exception of summer, when winds reach velocities of 15 to 18 knots, winds are generally less than 10 knots.

B. Hydrological Characteristics

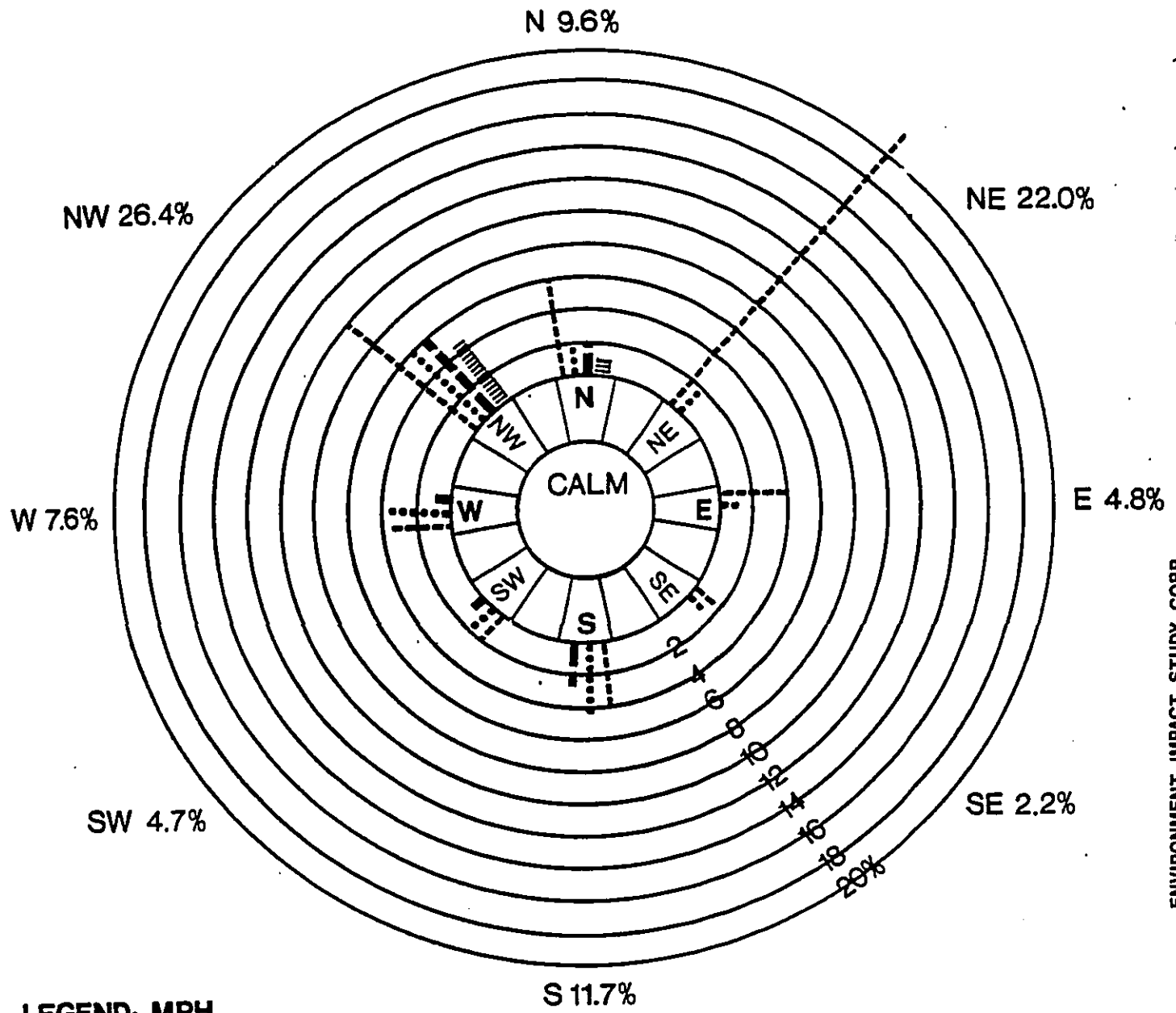
1. Surface Water

There are no perennial streams or surface water supplies in the area due to the arid climate caused by the lack of orographic effect.



MAKENA-KEONIOIO ROAD
ISOHYETS MAP

FIGURE 4



LEGEND: MPH
 ----- 3.0 - 7.0
 8.0 - 18.0
 - - - - 19.0 - 24.0
 ||||| OVER 24.0

Wind Rose - Wailea
 Period of record:
 August - December 1959

**MAKENA-KEONIOIO ROAD
 WIND ROSE**

FIGURE 5

ENVIRONMENT IMPACT STUDY CORP.

Although the area receives a low 10 to 30 inches of rainfall annually, there have been occasions when heavy rainfall is concentrated over a fairly short period. This previously caused flash flooding and runoff problems in the area.

2. Flood Insurance Study Designation

The project site lies within National Flood Insurance Program, Flood Insurance Rate Map Designation Zones A4 and C. Zone A4 is considered an area of 100-year flooding with determined base flood elevations and flood hazard factors. Zone C is considered an area of minimal flooding.

C. Biological Characteristics

1. Flora

The project site is located in an area designated as a beach zone which includes areas beyond the high-tide mark above the beach. This zone supports several species of indigenous plants common to most Pacific islands; namely, beach morning-glory, hau, scaevola, tree heliotrope and several introduced plants such as kiawe, slatbush, false mallow, sandbar and sow thistle. There are no known endemic or endangered species of plants within the project site.

2. Fauna

Birds more frequently seen in and inhabiting the area include the Common Noddy, Kolea or Pacific Golden Plover, Akekeke or Ruddy Turnstone, Wandering Tattler, Sanderling, Ring-Necked Pheasant, Indian Gray Francolin, Chukar Partridge, Rio-Grande Turkey, Spotted or Chinese Dove, Barred Dove or Zebra Dove, Barn Owl, Mockingbird, Common Mynah, Japanese White-Eye, House Finch or Linnet, Ricebird or Spotted Munia, House Sparrow, and the Cardinal.

The endemic Hawaiian bat might be found occasionally in the area. Introduced and common species of mammals found in the project area include the Roof rat or Black rat, Polynesian or Hawaiian rat, House mouse, and Small Indian Mongoose.

D. Archaeological and Historical Characteristics

The State Parks Administrator has indicated that the makai road parcel does not occur on historic properties that are listed on the Hawaii Register or the National Register of Historic Places, nor has it been deemed eligible for inclusion on the National Register of Historic Places.

The Hui Alanui O Makena has stated that the Makena-Keoneoio Road has evolved from the Piilani Trail built in the sixteenth century and provides continuous access along the entire Makena coastline. The applicant has acknowledged this position and has subsequently submitted the proposed action which after review and discussion with the Hui Alanui O Makena, addresses its concerns and needs.

1. Historical Characteristics

As stated in the EIS of February 1987, an examination of documents by the Bishop Museum did not provide any substantial evidence of prehistoric use of the Makena-Keoneoio Road in Makena, Maui. Specific references used in the search include various topographic maps, territorial survey maps, private land survey maps, aerial photographs, Land Court Awards, missionary and other early accounts, as well as various field notes and reports for previously conducted historical and archaeological research in this region of Maui.

References to the traditional Piilani Highway do not include this portion of the island in the catalogue of specific sections

CORRECTION

THE PRECEDING DOCUMENT(S) HAS
BEEN REPHOTOGRAPHED TO ASSURE
LEGIBILITY
SEE FRAME(S)
IMMEDIATELY FOLLOWING

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References to the traditional Piilani Highway do not include this portion of the island in the catalogue of specific sections

of the road, nor is there any reference to this portion when the road was constructed.

Searches were made of old maps to ascertain the historical usages of this portion of the road. The earliest reference to the next reference is an 1881 map showing an alignment, including this section, labeled "Kalepolepo Road." An 1885 map has this area labeled "road." A 1904 compilation of government maps shows a well-defined coastal alignment. The 1928 USGS map of the Makena quadrant shows a coastal alignment through this area. A 1950-51 USGS Aerial photo, Maui Series shows the coastal alignment is not well traveled. The 1954 USGS map for this same quadrant shows a coastal alignment but further inland. The 1983 USGS map shows the present alignment of the Makena Road. As indicated by these maps, there has been a defined road in this area since possibly 1845.

The information obtained so far, while not supporting prehistoric use of the Makena-Keoneoio Road in this area, does indicate substantial use in historic times. However, it appears that the alignment of this road, has undergone change throughout this period of time.

2. Archaeological Characteristics

The Bishop Museum has also indicated that no remains of a road or trail have been recorded in the project area. A field study conducted by the museum also produced no archaeological evidence of a Hawaiian trail on or beneath the makai road parcel (Appendix A, Makena-Keoneoio Road Cul-de-sacs Plan EIS, February 1987).

Additional work was conducted by the Bishop Museum in December of 1987 (Appendix A) at the south cul-de-sac and

public parking in the area. A summary of the recent survey findings is presented below.

The surface survey and two subsurface shovel pits yielded no archaeological remains in the makai road parcel. In general, due to the close proximity to the existing road, this parcel exhibits compounded extensive disturbance. The six shovel pits excavated in the Makena School Site parcel yielded similar negative results. The stratigraphy was generally uniform and reflected natural deposition of beachdune sand overlying the reddish-yellow Makena loam. In the northern half of the parcel the sand layer ranges in thickness from 0.3 to 0.5 meter. This overlying beach sand dissipates towards the higher standing southern half of this parcel.

Five surface features were located and recorded in this parcel; two are walls that define the boundary of the parcel, and three are stone structures located centrally within the northern third of the parcel where the proposed parking lot will be constructed. The parcel has been named the Makena School Parcel Historic Complex and assigned Bishop Museum site number 50-Ma-B8-252 and State No. 50-50-14-1007 to the whole parcel with feature numbers assigned to the surface remains.

The five surface archaeological features are:

- 1) A crude stacked wall roughly 80 meters long, 0.8 meter wide, and 0.5 meter high parallels the Makena road and forms the western boundary of the southern half of the parcel. The utilization of waterworn stones suggests modern origins. Also extensive past disturbance is indicated. According to a Territorial Survey Map (CSF No. 2809), this wall was in existence in 1936 and extended along the entire length of the western boundary of the parcel.
- 2) A core filled, double faced wall approximately 0.8 meter

wide, and ranging from 0.4 to 1.0 meter in height defines the northern boundary of this parcel. The northern parcel boundary is roughly 76 meters; however, the wall continues eastward beyond the limits of the parcel. The more diagnostic construction of this wall contrasts markedly with that of the Feature 1 wall and suggests a traditional land boundary.

3) A roughly square (3.0 by 2.7 meters) platform constructed of a single course of basalt boulders is 0.27 meter high along the western side and flush with the ground surface along the eastern side. A two by eight length of lumber is centrally incorporated into the structure, dividing it into east and west halves. The western half is boulder filled and the eastern half is a depression. Several square nails, 8 centimeters in length protrude from the lumber.

4) Another platform almost identical in construction with Feature 3 measures 3.3 by 3 meters. This structure also incorporates a depression and a length of lumber.

5) A large cement lined cistern, 4.5 meters in diameter and 3 meters deep is located west of the two platforms. Two irregular stone alignments appear to partially encircle the cistern. The Makena loam material resulting from the excavation of the cistern appear to be contained within the encircling alignment. At the top edge of the cistern are six slots that probably held a wooden cover.

In addition to the five features described above, two other concentrations of modern material were noted by the Bishop Museum at the old school site, one located just beyond the northeastern corner of the parcel and the other located within the southern third of the parcel.

The Bishop Museum has also stated that since the proposed

development in the public beach access site does not call for the removal of the existing concrete slab at the public beach access, no mitigation for any cultural deposits beneath it will be required (Appendix B).

E. Social Environment

The project area has experienced extensive development in recent years primarily through the construction of the Maui Prince Hotel. The surrounding region may experience future growth; however, this growth is expected to consist of resort development rather than residential expansion. Residential growth is not expected in the immediate project vicinity and the proposed project is not expected to have any impact on the immediate or regional area's growth.

The proposed project implements adopted County policies relative to the development of the Makena area, in particular that of the adopted Kihei-Makena Community Plan. Given the relatively "rural" environment of the Makena area today, it is reasonable to assume that the hotel and the proposed project contribute to perceptual changes in the physical environment and uses of the area. However, as previously noted, the proposed project is consistent with the adopted Kihei-Makena Community Plan, which identifies land use, social, economic, and environmental policies appropriate for the Makena area and implements the broad policies set forth in the adopted General Plan of the County of Maui, pursuant to Ordinance No. 1052 (1980).

F. Surrounding Land Uses

The project site is surrounded by the following land uses:

1. Area surrounding the proposed north cul-de-sac

- a) North - existing Makena-Keoneoio Road and single family residences;
 - b) East (mauka) - existing single family residences and undeveloped open area;
 - c) South - existing Makena-Keoneoio Road;
 - d) West (makai) - sand dune formation.
2. Area surrounding the proposed south cul-de-sac and public beach access
- a) North - existing Makena-Keoneoio Road;
 - b) East (mauka) - horse stables;
 - c) South - existing Makena-Keoneoio Road;
 - d) West (makai) - sand dune formation.
3. Area surrounding the proposed beach activities center and other improvements on the sand dune
- a) North - existing single family residence;
 - b) East (mauka) - existing Makena-Keoneoio Road and the Maui Prince Hotel.
 - c) South - undeveloped lands and portion of the Makena golfcourse;
 - d) West (makai) - shoreline.
4. Area surrounding the proposed public beach parking

The parking area is located in an undeveloped area with no improvements except the Makena-Keoneoio road located directly west of the site.

G. Related Projects

No related public or private projects are expected from the implementation of the proposed Cul-de-sacs Plan. The proposed project will transpire as a single and complete operation.

VI. RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS

The following agency actions are applicable to the proposed project and related improvements:

A. The proposed construction of the pedestrian footpath and installation of landscape planting is subject to the following agency actions:

1. Special Management Area (SMA) Use Permit, in accordance with Section 2-11 of Article II, SMA Rules and Regulations of the County of Maui.
2. Shoreline Setback Approval, in accordance with Section 13.e of Article III, Shoreline Setback Rules and Regulations of the County of Maui (NOTE: This action applies to the proposed landscape plantings and a portion of the mauka-makai walkway adjacent to the shoreline which requires the Planning Director's approval. Public beach access improvements require approval by the Planning Commission).

B. The proposed construction of the two (2) permanent cul-de-sacs, roadway improvements, public beach access and thirty (30) paved parking stalls are subject to the following agency actions:

1. Special Management (SMA) Use Permit, in accordance with Section 2-11 of Article II, SMA Rules and Regulations of the County of Maui.
2. Application for Permit to Perform Work Upon County Highway, in accordance with Chapter 12.04, Maui County Code.

C. The land use designations for project site are delineated, as follows in the adopted Kihei-Makena Community Plan, pursuant to Ordinance No. 1490 (1984):

1. The area involving the proposed north and south cul-de-sacs are so delineated on the community plan land use map.
 2. The area mauka of the shoreline between the bulbs of the proposed north and south cul-de-sacs and including the area of the proposed public parking stalls and the section of the Lower Makena Road proposed for closure are delineated for "Hotel" use in the community plan land use map.
 3. The area proposed for the beach activities center and landscape planting atop the sand dune are designated for "Hotel" use in the community plan map.
 4. The public beach access area is designated for Hotel/Open Space.
- D. The proposed project is considered to be in compliance with the Hawaii State Plan and the State Functional Plans. The plans with the most significance to the proposed project are the State Recreation Plan, the State Tourism Plan, and the State Transportation Plan.

SEC. 226-8 Objectives and Policies for the Economy-Visitor Industry.

The project area is designated for hotel, cul-de-sac, open space and public uses under current State and County land use regulations. The project under consideration will prove to be beneficial to the Maui Prince Hotel and consequently, the economy of the State's visitor industry.

SEC. 226-11 Objectives and Policies for the Physical Environment-Land-Based, Shoreline, and Marine Resources.

The beach fronting the project area is acknowledged as a valuable resource; and access to this resource will be

improved by the completion of the subject project. Continuity between the road parcel and the surrounding grounds will be enhanced with improved landscaping and maintenance. The shoreline will not be affected by the proposed project and the surrounding physical environment will not be adversely affected and, in fact, may be enhanced as a result of the elimination of vehicular traffic.

SEC. 226-12 Objective and Policies for the Physical Environment-
Scenic, Natural Beauty, and Historic Resources.

The proposed project is generally in conformance with the policies and objectives of this plan. The subject plan recognizes the cultural value of the area and is considered to enhance the area by preserving the Makena-Keoneoio road easement as a walkway.

SEC. 226-17 Objectives and Policies for Facility Systems-
Transportation.

The proposed project will not have significant impact on transportation considerations as a result of the cul-de-sacs/ road closure plan. Access along the Makena Alanui is significantly better than the Makena-Keoneoio Road when measured by current governmental standards. The impacts from the loss of direct point to point access will only affect those few residences located between the cul-de-sacs and the Makena Alanui. This impact is considered offset by the improved access along the Makena Alanui which serves approximately 90% of the current through traffic. Road improvements from the Makena-Keoneoio Road to the Makena Alanui also facilitates traffic through the area.

SEC. 226-25 Objectives and Policies for Socio-Cultural Advancement
Culture.

Historic use of the road parcel is acknowledged as is it's possible cultural value; however, the site is not considered by the Bishop Museum to be "culturally significant." The improvements to the Makena-Keoneoio Road are considered socio-cultural enhancements and are generally in conformance with the objectives and policies of this plan.

SEC. 226-103 Economic Priority Guidelines (b) Priority Guidelines to Promote the Economic Health and Quality of the Visitor Industry.

The subject project has been thoughtfully planned and it is felt that all concerns regarding the project have been thoughtfully considered. The Cul-de-sacs Plan would allow shoreline access to both hotel visitors and public residents; however, vehicular access between the cul-de-sacs would be eliminated. The project, which is properly setback from the shoreline, will allow good shoreline access; however, the loss of vehicular use along the parcel is noted as an offsetting impact.

SEC. 226-104 The Proposed Project May Have Some Indirect Effect on the Areas Economic Growth by Increasing the Desirability of the Maui Prince Hotel.

Regional growth in the future will occur as a result of additional resort growth. Access in the region is facilitated by the new Makena Alanui which serves as the major arterial. In this capacity, the Makena Alanui will divert most traffic away from the Makena-Keoneoio Road. This allows good shoreline access through the Cul-de-sacs Plan and the maintenance of a preserved, open environment without the concern of additional through traffic on the Makena-Keoneoio Road.

1. Conformance with the State Recreation Plan will be provided by improved access to the shoreline and the installation of public convenience facilities. Previously, access to the shoreline fronting the Maui Prince Hotel was restricted by fencing and lack of designated parking areas.
 2. The objectives of the State Tourism Plan will be facilitated by the proposed project through the creation of unimpeded access from the hotel to the shoreline, the mitigation of fugitive dust and noise, and allowing visual continuity of the landscaped area.
 3. The State Transportation Plan objectives state that the transportation needs of the State should promote the efficient, economical, safe, and convenient movement of people and goods. These objectives are considered to be addressed by the proposed project which will facilitate safe and efficient pedestrian travel to the shoreline. Vehicular traffic is also improved through use of the Makena Alanui which provides safe and efficient transport between the project termini.
- E. The General Plan of the County of Maui outlines objectives and policies similar to the State Plan. Sections relevant to the proposed project include: population, land use and the environments; economic activity; utility and facility systems; and human services.

Population, Land Use, and the Environment

No adverse impacts are expected on the physical environment. Scenic amenities and the physical environment will benefit from the proposed project while convenient access and parking to the beach will be enhanced.

Traditional lifestyles for a few may be altered by the road closure; however, convenient access will be available via the Makena Alanui. No impacts are expected on fragile environmental resources.

Economic Activity

The proposed project is expected to indirectly enhance the economic activity of the visitor industry by creating a more desirable environment for the hotel and resort.

Utility and Facility Systems

The subject project will support a transportation system which will enable people and goods to move safely, efficiently and economically. This will be promoted through the use of the Makena Alanui. The Makena Keoneoio Road is currently in substandard condition and the improvements provided by the subject project are felt to significantly improve traffic easement in the project area.

Human Services

The Cul-de-sacs Plan includes the use of improved public parking and restroom facilities which are in accordance with the objective of high-quality recreational facilities. Access to the beach is available to all by means of the north drop off area and the proposed public beach access near the south cul-de-sac.

VII. ANTICIPATED IMPACTS AND MITIGATIVE MEASURES

Impacts of the proposed project can be viewed in the short-and long-term. Short-term impacts, beneficial and adverse, generally result from construction-related activities. Consequently, these impacts are of short-term duration and should last no longer than the duration of the construction. Long-term impacts, beneficial and adverse, result from the implementation and operation of the proposed project.

As previously noted, the proposed action will involve construction or improvements within a portion of County lands, namely the Makena-Keoneoio Road right-of-way (also referred to as the Lower Makena Road), and within a portion of the 20-foot shoreline setback area. However, for purposes of evaluating potential project impacts, this Environmental Impact Statement will address the cumulative impacts of the project or that of the total project, as previously described, and not just the portion of the project area, subject to the provisions of Chapter 343, HRS.

A. Impact on Topographical Characteristics

The project involve some grading and filling along the walkway length to promote positive drainage and to mitigate ponding in the northern area. A preliminary grading and drainage report has been prepared for review by Maui County and a final report will be submitted when construction drawings are submitted for approval.

Improvements and landscaping will be planned to prevent sand dune erosion and to maintain a natural appearance.

In addition to the existing kiawe and palm trees, the existing plant inventory will be supplemented with hala, wiliwili, kou, milo, and more kiawe and palm. Noxious grasses and weeds will be cleared and replaced with iceplant and beach morning glory.

This plan represents a significant change over the original 1987 plan with the removal of the sand dune walkway. This deletion will eliminate excess deterioration of the sand dune from any walkway impacts. This change should result in a more stable and natural sand dune.

Appropriate measures shall be implemented during project construction to minimize the short-term impacts of the project relative to soil erosion from wind and rain and increased ambient noise levels from construction equipment. Project construction will be subject to applicable County building standards and construction impact mitigation measures.

B. Impact on Hydrological Characteristics

Physical alterations to the site are relatively minor and no impacts are expected on the hydrological characteristics in the area. Rainfall in the area is sparse; however, impacts occurring from occasional heavy rains should be adequately accommodated by drainage improvements outside of the project site. A storm water drainage plan has been prepared for the south cul-de-sac parking area and will be in conformance with applicable County building standards and applicable Department of Health regulations.

No significant increase in storm water runoff is expected from the addition of the shoreline access walkway and the sand dune stabilization landscaping.

The proposed project is expected to have fewer hydrological impacts than the original 1987 project, since the elimination of the sand dune walkway will result in less stormwater runoff and subsequent erosion.

C. Impacts on Biological Characteristics

Impacts on biological characteristics of the site will be limited to clearing of scrub along the road parcel, cul-de-sac and sand dune areas. No rare or endangered species of flora and fauna or associated major habitats are expected to be impacted by the action. There will be no change in biological impacts from the original proposal.

D. Impact on Archaeological Sites

All of the surface features located during December 1987 survey relating to proposed public parking (Appendix A) appear to date to the historic to modern periods, except for the Feature 2 wall which may have prehistoric origins. In addition, the eight shovel pits did not reveal any subsurface cultural deposits.

As stated in the archaeological reconnaissance survey for the south cul-de-sac area, the Territorial Survey Map (CSF No. 2809) shows the school building within the subject parcel. However, Features 3, 4, and 5 are not shown on this or any other map located during the archival research. In overlaying two maps (C.S.F. No. 2809 and the 1987 topographic map provided by the client) the school building overlaps portions of the Feature 5 cistern. These data suggests that the cistern was most likely not associated with the school and probably post-dates the abandonment of the school.

The interpretation of Features 3 and 4 is more difficult. The formal arrangement of these similar structures incorporating depressions, lumber, and low foundations, suggest the possible function as toilets. The presence of two such structures support the possibility that these may indeed be associated with the school as boys' and girls' toilets; however, further work is required to substantiate this interpretation.

No further work is recommended by the Bishop Museum for the cul-de-sac parcel. Although in sand dune environments the potential for unmarked burials is high, the sand in this particular area is shallow. Thus, although no monitoring is recommended during ground altering activities, should any cultural remains be encountered, activities should be temporarily halted in the vicinity until a qualified archaeologist can be retained to implement proper mitigation procedures.

The following recommendations are presented for the Makena School parcel:

- Feature 1) No further work is recommended for this western boundary wall remnant
- Feature 2) This wall should be preserved in situ and used as the north boundary wall for the parking lot. No further work is necessary, if in situ preservation is implemented.
- Feature 3) This platform will be destroyed by the parking lot if the current design configuration is retained. If destruction is imminent, intensive data recovery prior to construction is recommended to determine its' function.
- Feature 4) The second platform will be unaffected by the parking lot and thus should be preserved in situ. No further work is necessary, if in situ preservation is implemented.
- Feature 5) The cistern proper will not be directly affected by the current configuration which will impact the surrounding alignment on the northern side of the cistern. No further work is necessary. For safety considerations however, it should either be covered or filled.

In general, three of the features will be affected, but further work is recommended only for two features. Oral informant interviews are recommended prior to any further fieldwork since relevant data

(chronology and function) obtained from knowledgeable individuals may obviate the necessity for further fieldwork.

A review of the public park area (Bishop Museum February 1988, Appendix B), indicates that two features appear to be within the boundary of the beach access area.

Since the proposed development does not call for removal of the existing cement slab at site 237-1, the underlying cultural deposit, 237-2 will not be affected. Thus no further work is recommended directly within the project area. In the event that clearing and landscaping work exposes any subsurface features, a qualified archaeologist should be contacted to make a determination of any necessary mitigation procedures in coordination with the appropriate County and State agencies.

For the other shoreside remains in the vicinity, care should be taken during any construction related activities for the beach access, especially if any heavy equipment is involved, to stay within the project area boundaries to avoid affecting the nearby features.

Currently, there is moderate pedestrian traffic in the area from golfers, fishermen, and beach-goers within minimal observable adverse effects to these remains. The effect of increased traffic will have to be monitored following completion of the beach access. At that time, if warranted, appropriate mitigative procedures, such as fencing or data recovery should be implemented.

As stated in the EIS of February 1987, the State Parks Administrator, State Department of Land and Natural Resources, has advised that the Lower Makena Road and other areas of the project site do not involve historic properties that are listed on either the Hawaii or National Registers of Historic Places, or involve properties determined to be eligible for inclusion on the National or Hawaii Registers of Historic Places.

The Bishop Museum in a letter dated November 8, 1984 and February 2, 1987 has also indicated that no remains of a pre-historic road or trail have been located in the project area. A field study conducted by the museum also produced no archaeological evidence of a Hawaiian trail on, surrounding or beneath the section of the existing Makena-Keoneoio Road that is proposed for termination or within the adjacent sand dune area.

E. Impact on View Planes

Presently, there are limited view vistas or corridors from the makai road parcel due to the presence of large sand dune between the Lower Makena Road and the shoreline. The proposed action will leave the makai road as an open space walkway without any structures. Further, the realignment of traffic along the mauka Makena Alanui will provide pedestrians and vehicle occupants with view vistas of the shoreline and the offshore areas, although at a greater distance than that along the Makena-Keoneoio Road. There are no significant impact changes between the present proposal and the original cul-de-sacs plan.

F. Impact on the Sand Dune Formation

1. It is anticipated that there will be minimal adverse impacts on this resource. Construction will not involve any extensive earthwork within the sand dune. Also, the landscape planting plan for the area of the sand dune will involve infill planting of existing vegetative species and the planting of grass. The landscape planting will lessen any erosion of the sand dune and thus stabilize this formation. The only structures which would be built on or near the sand dunes are the mauka-makai beach access walkway and the beach activities shelter located on the walkway.

2. With the improvement of public beach access to this beach and operation by the Maui Prince Hotel, it is reasonable to assume that there will be increased public use of this area.

The Maui Prince Hotel complex is setback approximately 300 feet mauka from the shoreline and the sand beach area. With proper maintenance, increased public use of the area can be accommodated with minimal degradation of the shoreline environment. The proposed 1,100 foot long stone-paved walkway will provide improved pedestrian access within the area and also discourage people from walking over beach vegetation. The existing sand dune formation will remain intact as a coastal resource.

3. The deletion of the shoreline walkway offers significant benefits in maintaining sand dune stability. The previously proposed walkway may have adversely impacted the stability of the sand dune formation by causing unnatural erosion and affecting drainage patterns. The presently proposed plan, eliminate the walkway and any potential impacts resulting from its construction.

G. Social Aspects

The proposed project implements adopted County policies relative to the development of the Makena area, in particular that of the adopted Kihei-Makena Community Plan. Given the relatively "rural" environment of the Makena area today, it is reasonable to assume that the hotel and the proposed project contribute to perceptual changes in the physical environment and uses of the area. However, as previously noted, the proposed project is consistent with the adopted Kihei-Makena Community Plan, which identifies land use, social economic, and environmental policies appropriate for the Makena area and implements the broad policies set forth in the adopted General Plan of the County of Maui, pursuant to Ordinance

No. 1052 (1980). The proposed project has also been reviewed by the Hui Alanui O Makena.

H. Impact on the Shoreline Setback Area

1. Pursuant to Section 6.C. of the Shoreline Setback Rules and Regulations, the parcels, identified by TMK 2-1-05:57 and 59, proposed for portions of the landscape planting improvements qualify for a 20-foot shoreline setback, because the buildable area of the parcels are reduced to less than 50 percent of the parcel area after applying the 40-foot shoreline setback and other State and County requirements.

No significant impacts are expected from the mauka-makai beach access. The walkway will promote pedestrian traffic through an improved access which should mitigate pedestrian caused sand dune erosion and landscaping damage.

The deletion of the shoreline walkway as proposed in the February 1987 EIS, eliminates any unnecessary construction in the shoreline area.

I. Impact on Drainage and the Flood Hazard District

1. Based on comments from the Department of Public Works ("DPW"), it is noted that the agency will require the submittal of a detailed drainage plan, as part of its subsequent review of construction plans. According to DPW, given the nature of the proposed project, it is not expected that the project will result in significant impacts relative to drainage or flooding within the surrounding area.
2. The walkway corridor will be regraded with a 2% slope to promote positive surface water drainage and to alleviate the

current ponding problem at the north area. Drainage inlets and dry wells will be added to dispose of excess water run-off in this area.

3. Also, according to the DPW, the proposed project is a permitted development, pursuant to Chapter 19.32, Maui County Code relating to flood hazard districts.

J. Design Requirements

The DPW comments also specify various design requirements (e.g. installation of sidewalks; handicapped ramps etc.) that apply to the proposed project. According to the DPW, these requirements should be incorporated in the detailed plans required in terms of subsequent construction approvals.

K. Construction-Related Impacts

During construction, it is anticipated that the project will contribute, to short-term adverse impacts associated with dust, soil erosion, noise and traffic-related impacts. These impacts can be mitigated by implementing appropriate mitigation measures during construction. Mitigation measures may include watering and screening for fugitive dust and soil control, and adherence to governmental noise controls for construction related vehicles.

VIII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY AND IRRREVERSIBLE/IRRETRIEVABLE COMMITMENTS OF RESOURCES

The proposed project would remove the subject portion of the Makena-Keoneoio Road from existing vehicular use. This loss would not affect pedestrian access; however, it would terminate what is considered a portion of a continuous coastal access route.

It is anticipated that the construction of the proposed project will commit the necessary construction materials and human resources (in the form of planning, designing, engineering, construction labor, landscaping, and personnel for maintenance functions). No construction materials are likely to be reused. Labor expended for this development is not retrievable. However, labor will be compensated during the various stages of the project by the developer, commercial businesses, and the building's management.

The appearance of the project site will be altered from its arid, undeveloped appearance to that of an integrated landscaped, open space. The development will be highly visible as an open space integrated with the surrounding areas.

Air and noise quality will be improved by this proposed project. While ambient air and noise quality in the area is relatively good, the proposed development will eliminate vehicular access through the project area, resulting in no vehicular pollution and fugitive dust.

The project development will result in a commitment of land for a long-term period. Once open space use is established, it is unlikely that the land will be reverted to other development in the long-term future. Commitment of land for this purpose will likely foreclose certain future use options of the land.

The project development will, in the short- and long-term result in resort and recreational access uses which will likely benefit residents, resort guests, the landowner and private businesses. The coordinated planning effort with the Hui Alanui O Makena is considered to be culturally and historically sympathetic and should, therefore, be considered a valuable asset to the area.

IX. ANY PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

The following adverse environmental effects (both short- and long-term) cannot be avoided.

- (1) Vehicular access between the two cul-de-sacs on the existing road will be lost. This will eliminate the current practice of road side parking on the existing roadway; however, parking will be provided near both cul-de-sacs. This access has been redirected on the Makena Alanui. Pedestrian access along the Makena-Keoneoio Road will be redirected to the refinished, stone-paved walkway.
- (2) The site-clearing and construction work will result in temporary fugitive dust, some disruption to traffic, and noise.

X. SUMMARY OF UNRESOLVED ISSUES

The County of Maui Planning Commission has determined that the proposed Cul-de-sacs Plan represents a significant and substantive revision to the original scope of the Cul-de-sacs Plan described in the Final EIS of February 1987, and has therefore, required that the subject Supplemental Environmental Impact Statement be prepared.

At this time, there are no unresolved issues from the standpoint of potential physical impacts. A question of the cultural impact of the proposed action has been raised; however, no concurrence has been obtained on the actual value of the site in question. Alternatives to the proposed action were developed but were found to be less desirable than the subject project.

XI. AGENCIES AND ORGANIZATIONS CONSULTED FOR THE
 MAKENA-KEONEOIO ROAD CUL-DE-SACS PLAN
 SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE
 AND LIST OF PREPARERS

<u>Organization/Agencies</u>	<u>Date of Comment</u>	<u>Date Comment Received</u>	<u>Date of Response</u>
<u>State</u>			
OEQC	-----	-----	-----
Department of Accounting & General Services	12/22/87	12/23/87	NRN
Department of Agriculture	12/08/87	12/10/87	NRN
Department of Defense	-----	-----	-----
Department of Health	12/14/87	12/16/87	NRN
Department of Land & Natural Resources	-----	-----	-----
Department of Business & Economic Development	01/05/88	01/07/88	NRN
Department of Business & Economic Development- Housing Finance & Development Corp.	12/10/87	12/14/87	NRN
Department of Transportation	01/05/88	01/11/88	NRN
<u>University of Hawaii</u>			
Department of Anthropology	-----	-----	-----
Environmental Center	-----	-----	-----
Water Resources Research Center	-----	-----	-----
<u>Federal</u>			
Department of the Navy	11/27/87	12/30/87	NRN
Soil Conservation Service	12/18/87	12/22/87	NRN
U.S. Army Corps of Engineers	-----	-----	-----
U.S. Coast Guard	-----	-----	-----
U.S. Fish and Wildlife Service	12/03/87	12/07/87	NRN
U.S. Geological Survey	11/30/87	12/02/87	NRN
<u>County of Maui</u>			
Department of Parks and Recreation	-----	-----	-----
Department of Public Works	12/11/87	12/16/87	01/05/88
Department of Water Supply	-----	-----	-----

<u>Organizations/Agencies</u>	<u>Date of Comment</u>	<u>Date Comment Received</u>	<u>Date of Response</u>
Economic Development Agency	-----	-----	-----
Maui Community College Library	-----	-----	-----
Planning Department	-----	-----	-----
Kihei Community Library	-----	-----	-----
Maui Historical Society	-----	-----	-----
Hui Alanui O Makena	12/17/87	12/21/87	02/02/88
Office of Hawaiian Affairs	-----	-----	-----
Sierra Club, Hawaii Chapter	-----	-----	-----

LIST OF PREPARERS

Environmental Communications, Inc. - Technical Writers
 F. J. Rodriguez
 Taeyong M. Kim

Phillips, Brandt, Reddick - Landscape Architect
 Ron Mah
 Tod Black

Bishop Museum - Archaeological
 Aki Sinoto
 Paul L. Cleghorn
 Carol Kawachi

XII. COMMENTS AND RESPONSES DURING EIS PREPARATION NOTICE

JOHN WAHIEE
GOVERNOR



SUZANNE D. PETERSON
CHAIRPERSON, BOARD OF AGRICULTURE

DEPUTY TO THE CHAIRPERSON

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

Mailing Address:
P. O. Box 22159
Honolulu, Hawaii 96822-0159

(P)2115.7

December 8, 1987

DEC 22 1987

Mr. John Min
Maui County Planning Commission
200 South High Street
Wailuku, Maui 96793

Mr. John Min
Maui Planning Commission
Maui County
200 South High Street
Wailuku, Maui, Hawaii 96793

Subject: Supplemental Environmental Impact Statement
Preparation Notice (EISPN) for Makana-Keoneoio Road
Cul-De-Sacs Plan
Seibu Hawaii, Inc.
THK: 2-1-05: 84, 86
2-1-06: 56, 57, 59 Hakena, Maui

Dear Mr. Min:

Subject: Makana-Keoneoio Road Cul-De-Sacs Plan
Environmental Impact Statement
Preparation Notice (EISPN)

We have reviewed the subject document and have no
comments to offer.

Very truly yours,

TEUANE TOMINAGA
State Public Works Engineer

CI:jk
cc: Mr. F. J. Rodriguez

NO RESPONSE NEEDED

Dear Mr. Min:

The subject project is within the State Urban District and
is designated for Hotel, Public and Cul-de-Sac use. We are of
the opinion that the project will not affect the agricultural
resources of the area, nor the plans, programs and activities of
the Department of Agriculture.

Thank you for the opportunity to comment.

Sincerely,

SUZANNE D. PETERSON
Chairperson, Board of Agriculture

cc: Mr. F. J. Rodriguez, Environmental Communications, Inc.
OEQC

NO RESPONSE NEEDED

DEC 23 1987

DEC 10 1987

JOHN WAHIEE
GOVERNOR
ROGER A. ULVELING
DIRECTOR
MICHAEL E. TOWILL
DEPUTY DIRECTOR
BARBARA SIM STANTON
DEPUTY DIRECTOR



DEPARTMENT OF BUSINESS
AND ECONOMIC DEVELOPMENT

KAUNALAHU OFFICE, 200 SOUTH HIGH STREET, HONOLULU, HAWAII
TELEPHONE: 521-2100 FAX: 521-2101 TELETYPE: 521-2102

JOHN C. LEHMAN, M.D.
DIRECTOR OF HEALTH



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3379
HONOLULU, HAWAII 96811

December 14, 1987

Ref. No. P-7890

January 5, 1988

In reply, please refer to:
EPHSD

Mr. John Min
Maui Planning Commission
County of Maui
200 South High Street
Mailuku, Hawaii 96793

Dear Mr. Min:

Subject: Preparation Notice, Makena-Keonele Road Cul-De-Sacs Plan,
Supplemental Environmental Impact Statement

We have reviewed the subject preparation notice and do not have any
comments to offer relative to the Hawaii Coastal Zone Management (CZM)
objectives and policies.

Sincerely,

Murray E. Towill
for Roger A. Ulveling

cc: Mr. F.J. Rodriguez ✓
Environmental Communications, Inc.

NO RESPONSE NEEDED

MEMORANDUM

To: Mr. John Min, Maui Planning Commission
Maui County

From: Deputy Director for Environmental Health

Subject: Supplemental Environmental Impact Statement Preparation Notice for
Makena-Keonele Road Cul-De-Sacs Plan, Makena, Maui, Hawaii

We have no comments at this time.

Bruce S. Anderson
BRUCE S. ANDERSON, Ph.D.

cc: Mr. F. J. Rodriguez ✓

NO RESPONSE NEEDED

DEC 16 1987

JAN 7 1988



EDWARD Y. HIRATA
DIRECTOR

DEPUTY DIRECTOR
JOHN K. UCHIDA
RICHARD N. HIRANO
DANIEL KOON

IN REPLY REFER TO
STP 8-2587

JOHN WALKER
GOVERNOR

RUSSELL N. FUKUMOTO
Acting Executive Director

IN REPLY REFER
TO:



STATE OF HAWAII
Department of Business and Economic Development
Housing Finance and Development Corporation
P. O. BOX 17867
HONOLULU, HAWAII 96817

87:PING/5253JT

December 10, 1987



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
161 PUNAHONA STREET
HONOLULU, HAWAII 96813

January 5, 1988

Mr. R.J. Rodriguez
Environmental Communications, Inc.
P.O. BOX 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Makana Keoneoio Road Cul-De-Sacs
Plan EISPN

We have no comments to offer for the Makana Keoneoio Road
Cul-De-Sacs Plan since the project does not affect the State
Highway System.

Thank you for the opportunity to comment on your proposed
project.

Very truly yours,

Edward Y. Hirata
Edward Y. Hirata
Director of Transportation

NO RESPONSE NEEDED

JAN 11 1988

Mr. John Min
Maui Planning Commission
Maui County
200 S. High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

Subject: Makana Keoneoio Road Cul-De-Sacs
Plan Supplemental Environmental
Impact Statement Preparation Notice
(EISPN)

We have reviewed the subject EISPN and have no comments to
offer.

Sincerely,
ORIGINAL SIGNED

RUSSELL N. FUKUMOTO
Acting Executive Director

cc: Mr. F. J. Rodriguez

NO RESPONSE NEEDED

DEC 14 1987



DEPARTMENT OF THE NAVY
 COMMANDER
 NAVAL BASE PEARL HARBOR
 BOX 110
 PEARL HARBOR, HAWAII 96860-0110

IN REPLY REFER TO
 5090 (108)
 Ser NSB/21770

Environmental Communications, Inc.
 P. O. Box 536
 Honolulu, Hawaii 96809

Gentlemen:

SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
 PREPARATION NOTICE (EISPN) FOR THE
 MAKENA-KEONEOIO ROAD CUL-DE-SACS PLAN

The Supplemental EISPN for the Makena-Keoneoio Road Cul-De-Sacs Plan has
 been reviewed and we have no comments.

Thank you for the opportunity to review the Supplemental EIS Preparation
 Notice.

Please address future letters to Captain R. M. Gallen, Base Civil Engineer.

Sincerely,

R. M. GALLEN
 Captain, CEC USNavy
 Naval Base Pearl Harbor
 Pearl Harbor, Hawaii

NO RESPONSE NEEDED

NOV 30 1987

UNITED STATES
 DEPARTMENT OF
 AGRICULTURE

SOIL
 CONSERVATION
 SERVICE

P. O. BOX 50004
 HONOLULU, HAWAII
 96850

December 18, 1987

Mr. John Hira
 Maui Planning Commission, Maui County
 200 S. High Street
 Wailuku, Maui, Hawaii 96793

Dear Mr. Hira:

Subject: Makena Keoneoio Road Cul-De-Sacs Plan Supplemental
 Environmental Impact Statement Preparation Notice
 (EISPN)

We have no further comments to your letter of November 23, 1987, regarding
 the above subject matter.

Sincerely,

RICHARD H. DERICAR
 State Conservatologist
 cc: Mr. F.J. Rodriguez, Environmental Communications, Inc.,
 Honolulu, HI

NO RESPONSE NEEDED

DEC 22 1987



United States Department of the Interior

FISH AND WILDLIFE SERVICE
100 ALA MOANA BOULEVARD
P. O. BOX 50187
HONOLULU, HAWAII 96850

NO RESPONSE NEEDED
ES
Room 6307
DEC 3 1987

Mr. F. J. Rodriguez
1146 Fort Street Mall
Suite 200
Honolulu, Hawaii 96813

Re: Makana Keoneoio Road Cul-De-Sacs Plan Supplemental
Environmental Impact Statement Preparation Notice (EISPN)

Dear Mr. Rodriguez:

We have reviewed the referenced material and find that due to its nature, the proposed project will have no significant deleterious impact on fish and wildlife resources. Please do not hesitate to call on us if we may be of further assistance.

We appreciate this opportunity to comment.

Sincerely yours,

Ernest Kosaka

Ernest Kosaka, Field Supervisor
Environmental Services
Pacific Islands Office

cc: NMFS - WPPD
BLNR
EPA, San Francisco

NO RESPONSE NEEDED



DEC 7 1987

Save Energy and You Serve America!



United States Department of the Interior

GEOLOGICAL SURVEY
WATER RESOURCES DIVISION
P. O. Box 50166
Honolulu, Hawaii 96850

November 30, 1987

Mr. John Min
Maui Planning Commission
Maui County
200 S. High Street
Wailuku, Maui, Hawaii 96793

Subject: Makana Keoneoio Road Cul-De-Sacs Plan Supplemental
Environmental Impact Statement Preparation Notice

Dear Mr. Min:

We have reviewed the subject EISPN and have no comments. Thank you for the opportunity to review the notice.

Sincerely,

William Meyer

William Meyer
District Chief

cc: Mr. F.J. Rodriguez, Environmental Communications, Inc.

DEC 2 1987

NO RESPONSE NEEDED

HANNIBAL TAVARES
Mayor
ALVIN K. FUKUNAGA
Director
BRIAN WASHIRO, P.E.
Deputy Director
GEORGE MATA
Highways Division
FRED JARVIS, P.E.
Engineering Division
ESSIE MILLER, P.E.
Asset Management Division
AARON SHINMOTO, P.E.
LAND USE AND CODES ADMINISTRATION



COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS

200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793
December 11, 1987

Mr. John Min
Maui Planning Commission
200 S. High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:


SUBJECT: MAKENA-KEONEOIO ROAD CUL-DE-SACS PLAN

We have reviewed the supplemental environmental impact statement for the above subject matter and have the following comments to offer.

1. Page i-2. That concrete sidewalks be used instead of the asphaltic concrete sidewalk.
2. Page II-1. That concrete sidewalks be used instead of asphaltic concrete sidewalk.
3. Page III-2. That a final drainage and erosion control plan be submitted for review and approval.

Thank you for the opportunity to comment on this matter.

Very truly yours,


ALVIN K. FUKUNAGA
Director of Public Works

cc: Mr. F. J. Rodriguez

DEC 16 1987



MAKENA RESORT
SEIBU HAWAII, INC.

January 5, 1988

TO: Mr. Fred Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

FROM: Roy Figueiroa, Project Coordinator *RF*

RE: Makena-Keoneoio Road Cul-de-sacs Plan

In response to the December 11, 1987 comments submitted by Alvin K. Fukunaga, Director of Public Works, County of Maui we will change our construction plans to show concrete sidewalks instead of asphaltic concrete and will submit a final drainage and erosion control plan with final construction plans. A preliminary drainage and erosion control plan has been prepared and will be submitted with the S.M.A. permit application for Public Works review and comments.

The above would satisfy the concerns of the Department of Public Works as confirmed in my discussion today with Mr. Aaron Shinmoto, Administrator of Land Use and Codes, Department of Public Works.

cc: A. Shinmoto

JAN 6 1988

5415 MAKENA ALANUI KEHEI, MAUI, HAWAII 96753 TELEPHONE (808) 879-2455 FAX (808) 879-8530

ISAAC DAVIS HALL

ATTORNEY AT LAW
2087 WELLS STREET
WAILUKU, MAUI, HAWAII 96793
(808) 244-9017

December 17, 1987

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, HI 96809

Re: Request to be a consulting party

Dear Mr. Rodriguez:

We have noted that a preparation notice for the Supplemental Environmental Impact Statement ("SEIS") for the Makana-Keoneoio Road Cui-de-Sacs Plan has been published in the OEQC Bulletin. The deadline for requesting to be a consulting party is shown as December 23, 1987.

On behalf of Hui Alanui o Makena we request to be made a consulting party in the preparation of the SEIS. Our reason for doing so is based upon the same concerns which were stated to you in our letter dated September 19, 1987. These earlier stated concerns are hereby incorporated by reference based upon the September 19th letter which is attached.

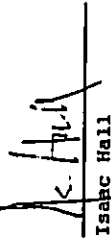
As a result of a Settlement Agreement between Hui Alanui o Makena and Seibu Hawaii, Inc., it has been agreed that a 1,100 foot section of Makana Road will be closed to vehicular traffic. In recognition of the historic and cultural importance of the road as a part of the Pi'ilani Trail and to ensure continued access, a trail will be constructed in the 20 foot wide right of way that has been reserved along the entire 1,100 foot length of roadway for public access. We will be working closely with Seibu on plans for the construction of the trail.

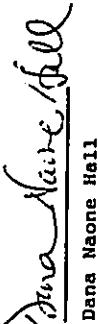
We are also particularly concerned about the proposed construction of interconnecting pathways, for hotel use only, on the sand dune makai of the road. These pathways, as shown in an attachment to the SEIS preparation notice, would have an adverse effect on the sand dune. It is our understanding, after talking with representatives of Seibu, that this system of pathways will not be constructed because of the potential adverse effects on the integrity of the sand dune. If this is so, we heartily concur. We look forward to consulting with you on the preparation of the SEIS.

Letter to Environmental Communications, Inc.
Page 2

If you have any questions, please do not hesitate to call.

Mālama Mākena,


Isaac Hall


Dana Maone Hall

DEC 21 1987

Page two -- HAOM Consulting Party

HUI ALANUI O MAKENA
200 East Kulaaha Road
Haiku, Hawaii 96708
September 19, 1986

Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Re: Request to be a Consulting Party

Dear Sirs,

Hui Alanui o Makena requests that it be made a consulting party in the preparation of the Environmental Impact Statement (EIS) which is being prepared through your office, on Seibu Hawaii, Inc.'s (Seibu) proposed project to construct cul-de-sacs on a portion of the Makena-Keoneolo Road. Seibu and the County of Maui have made every effort to focus solely on the purported benefits that will be obtained if a 1,100 foot section of the road is allowed to be closed. The EIS will be adequate only if it takes a hard look at all of the negative impacts that would flow from the proposed project.

The members of Hui Alanui o Makena are kama'aina of Makena and members of the native Hawaiian community, who are actively engaged in the study, protection and preservation of Hawaiian history and culture and who use the Makena-Honuoula area for traditional and customary practices related to fishing, shorelines gathering, recreation and other activities. The Makena-Keoneolo (Makena) Road and the access, including vehicular, that it provides is an integral and irreplaceable part of Hawaiian culture, and allows for the full and continued exercise of traditional and customary rights.

Our members are in the best position to consult with you on the disastrous impacts which flow from the proposed closing of a section of the road, and we would be happy to provide testimony and documents that will make these impacts clear.

We have the following comments on the environmental impacts of the project to help shape and give direction to the Draft EIS and we offer suggestions as to the data which needs to be collected, the research which should be undertaken and the studies which should be prepared in order to complete a competent and thorough analysis of the full range of environmental impacts that the project will generate:

1. Statement of Purpose and Need for the Project.

Documents submitted thus far define the purpose of Seibu's project as effectuating the Kihai-Makena Plan. This is a self-serving statement which does not truly identify the purpose of

the project. The most accurate statement for the purposes of environmental review is that the cul-de-sacing of the road will terminate the right of the public to travel in cars or walk along the coastline on the Makena Road in front of the Maui Prince Hotel. This should be the starting point of the EIS.

The need for the project must be accurately stated. Seibu claims that in order for the Maui Prince Hotel to be a "first class hotel" it must provide a private, exclusive area for its guests between the hotel and Naupaka Beach. Seibu further claims that the existence of a public road in this area jeopardizes its particular private economic interest.

It is important to acknowledge the true purpose and need for the project so that the adverse consequences can be properly balanced with this purpose and need in the EIS.

2. Environmental Setting/Existing Situation.

The EIS must describe what the area affected by the project is like before actions are taken to close the road. This means discussing the environmental impacts on the whole Makena-Honuoula area, the lifestyles of those living in the area and the use of the area by residents and native Hawaiians in particular. All cultural resources must be identified.

Since termination of public uses of the area are proposed, the EIS must thoroughly investigate historical -- including pre-historical, current and potential use(s) of the area with particular attention to the role of the Makena Road in the life of the community over time.

It will be necessary to do a thorough study of the historical and cultural importance of the roadway. Attention must be paid to the location of the road along the coast; its function in pre-historic and historic times; its use within the context of the Hawaiian land tenure system; its linking of ahupua'as, communities, and religious and cultural sites; its facilitation of traditional and customary native Hawaiian uses; the association of the roadway with important figures in Hawaiian history; its importance as a primary access route from which other access radiates ensuring more comprehensive access to coastal resources; the continuity of all of these uses over time; and the necessary evolution and development of meaningful access, contemporary with the times, from pedestrian to vehicular.

A traffic study and functional beach access study need to be prepared to determine the extent to which Maui residents require and prefer access along the old coastal roads, in this case the Makena Road, and the extent to which parking stalls and pedestrian pathways are adequate mitigations for the restriction of access caused by coastal road closures.

Finally, the EIS must address land ownership in the area. It should investigate Seibu's title to Grant #35 and the problem concerning the loss of ceded lands on both sides of the road.

3. Related Projects and Cumulative Impacts.

For centuries, this thoroughfare has permitted travel along the coastline around the entire island. The proposed closure and relocation of a portion of Makena Road is related to previous closures of the coastal road(s) on Maui, as well as contemplated closures which must be studied. Coastal road closures have occurred in Kanapali and Wailea, and the closing of another section of the Makena Road at Palaua is being considered (County commitments are being given by the Mayor and Planning Department personnel to a private developer at Palaua). Another related road closing is that of the Ulupalakua to Makena Landing Road.

In addition, related projects which should be studied are the construction of the Makena Alanui Road as a replacement for the Makena Road and other projects detailed in the Master Plan for Seibu's Makena resort; particularly as they disrupt existing systems of access in the area, make the area unrecognizable to the community and have, as a purpose, the removal of local residents from the area.

The development of a State park at Makena also should be studied in view of the provision for public uses there after curtailments of these uses in Wailea, Palaua and at Seibu's resort.

These related projects must be reviewed for their social and cumulative impacts and for their inter-relationship with Seibu's proposed closure of a 1,100 foot section of Makena Road.

Finally, this project should be viewed as part of the larger effort to close a portion of the road. The Special Management Area (SMA) permit to construct cul-de-sacs on the road is one of a series of actions necessary to close the road. The whole series of actions must be reviewed from the approval of the land exchange between the State of Hawaii and Seibu in 1984; the subdivision of the roadway by the County of Maui; the abandonment and disposition of the road by the Maui County Council and the deed of the 1,100 foot section of the road by Mayor Tavares. When the construction of the cul-de-sacs is part of a series of related government actions, all of the actions must be reviewed as a whole.

4. Relation to Plans.

The project must be reviewed in terms of other appropriate land use plans and not just in terms of the Kihai-Makena Community Plan. A review of the following plans should take place, with particular attention to the provisions that relate to the protection of coastal, historic, cultural and religious resources,

and provisions that relate to coastal and shoreline access and ways in which the interests of communities affected by development can be protected; State Plans and Functional Plans in Historic Preservation, Recreation, Transportation and Tourism; County Plans for Cultural Resources Management and Tourism; Access; and the Coastal Zone Management and Shoreline Access; and the Coastal Zone Management Plan.

5. Significant Adverse Impacts.

The EIS must address the consequences of the project and its impacts on the environment in the broadest sense. Impacts must be identified, then it must be determined if they are adverse, irreversible and significant. Considerable guidance is given in the applicable regulations concerning these determinations. We only note some of these regulations, which the Environmental Council has already agreed are significant when it reviewed the Environmental Assessment (EA) for the project.

(a) Commitment to loss or destruction of a historic, cultural and religious resource. Any thorough and professional study of the road will acknowledge its importance in Hawaiian history and culture. We strongly advise the scope of the review not be limited to the 1,100 foot section of the road. The road must be considered in its whole context, as part of the ancient coastal route that circled the island of Maui. The fact that some sections of the road have been closed in the past does not diminish the importance of sections that are still open, rather it increases the importance of the remaining portions.

The road has evolved over time and has always afforded full access as required by the times, which has been in making the appropriate transitions from pack-trail carriage and wagon cart and, finally, to four-wheeled access. The latter form of access is the most approved for our time. Hul Alanui o Makena would like to maintain continuous, unrestricted, meaningful access along Makena Road, and is not in favor of a restricted version plucked from the past.

(b) Curtailing the range of beneficial uses of the area. Current uses of the roadway by the public are unrestricted; the full range of beneficial uses is still possible. The EIS must address the impacts which would flow from the curtailment of these uses.

The EIS must study whether the mauka Makena Alanui Road replaces the coastal road and provides all of the benefits that use of the Makena Road provides.

6. Study of Unavoidable Impacts.

The EIS must acknowledge that what is proposed is a permanent,

XEROX COPY

ENVIRONMENTAL
COMMUNICATIONS
INC.

February 2, 1988

Mr. Isaac Davis Hall
Attorney at Law
2087 Welle Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Hall:

Subject: Supplemental Environmental Impact Statement Preparation
Notice for the Makena-Keoncolo Road Cul-de-sac Plan

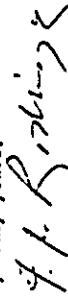
We have received your request dated December 17, 1987 to be a consulting party in the preparation of the Supplementary Environmental Impact Statement that is currently in process.

The final design of the proposed alternative has been developed with input and consultation from the Hui Alanui O Makena to preserve the cultural integrity of the historic Pillani Trail.

Your understanding is correct that the earlier proposed system of pathways on the sand dune will not be constructed.

Thank you for your continuing concern.

Very truly yours,



F. J. Rodriguez

FJR:ls

cc: Eric T. Machara
Roy Figueiroa

8. Mitigation Measures.

In suggesting mitigation measures, it should be remembered that the whole point of an environmental impact analysis is to reduce significant, unavoidable impacts to insignificant levels. It should be clearly noted that the members of our group and many other residents of Maui do not consider either the mauka alignment of the Makana Alanui Road or the construction of a footpath as appropriate, adequate or acceptable mitigating measures, since neither of the two, alone or in combination, provides the full range of benefits that have been afforded by the coastal road for centuries.

We want to work closely with you to help develop an EIS, which fully addresses and analyzes all of the environmental impacts that will be generated by Seibu's proposed project. We look forward to the preparation of an EIS which is in accordance with the EIS regulations of the State of Hawaii.

Makana Alanui,

Dana Neumeister

DANA NEUMEISTER

Isaac Hall

ISAAC HALL

irreversible closing of a section of Makana Road. The EIS should include an appropriate analysis of unavoidable impacts and identify the governmental interests that offset all unavoidable impacts.

7. Study and Analysis of Alternatives.

All known and reasonable alternatives must be studied:

(a) No action. The alternative of keeping the road open should be studied thoroughly. If this will harm Seibu, some competent, hard evidence should be required to substantiate in exactly what ways and to what extent Seibu will be hurt by keeping the road open.

(b) Alternatives achieving the same goal. Similar benefits could be achieved if Seibu constructed either a tunnel, the top of which could be landscaped to provide the ambience of exclusivity or an overpass or bridge(s) could be constructed to provide private and exclusive access from the hotel to the beach. In this way the road could remain open and Seibu could satisfy its desire for exclusivity and privacy.

Maintaining and improving the road, as an alternative to closing it, should also be explored. The road could be paved with cobblestones to give it an antique and finished look and would be an asset to the resort. Along with appropriate landscaping, the cobbling or stone paving of the road would add to the attractiveness of the area. In addition, the cobbled surface would limit the speed at which vehicles could travel over it.

Other ways in which vehicular traffic could be limited made safer include the construction of speed bumps, the posting of signs limiting vehicular speed and the prohibiting of commercial vehicles.

(c) Alternatives regarding vehicular and pedestrian access. The EIS should study alternate connecting routes between the mauka road and Makana Road. If the 1,100 foot section of Makana Road is closed off to vehicular traffic, a study should be made which considers connecting routes that travel directly mauka from the cul-de-sac to the Makana Alanui Road. As it is now planned, if the road is closed off, anyone travelling on Makana Road will have to double back some distance from either cul-de-sac before being able to loop up to the Makana Alanui Road and around the hotel.

Different combinations of all of the alternatives suggested above should be analyzed to determine which would entail the fewest adverse impacts so that the decision-maker can choose the best alternative(s).

XIII. AGENCIES AND ORGANIZATIONS CONSULTED DURING THE DRAFT
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT PERIOD AND
LIST OF PREPARERS

ORGANIZATIONS AND AGENCIES

<u>Agency</u>	<u>Date of Comment</u>	<u>Date Comment Received</u>	<u>Response to Comment</u>
<u>State</u>			
Department of Accounting & General Services	3/22/88	3/24/88	NRN
Department of Agriculture	5/05/88	5/09/88	NRN
Department of Defense	4/04/88	4/05/88	NRN
Department of Health	4/05/88	4/12/88	NRN
Department of Business & Economic Development	5/09/88	5/16/88	6/20/88
DBED Housing Finance & Development Corp.	3/30/88	4/05/88	NRN
Department of Land and Natural Resources	4/21/88	4/27/88	6/20/88
Department of Transportation Energy Office	-----	-----	-----
Land Use Commission	-----	-----	-----
Office of Hawaiian Affairs OEQC	3/22/88	4/27/88	NRN
<u>University of Hawaii</u>			
Environmental Center	5/09/88	5/10/88	6/20/88
Water Resources Research Center	-----	-----	-----
<u>County of Maui</u>			
Planning Department	-----	-----	-----
Department of Parks & Recreation	4/19/88	4/21/88	NRN
Department of Water Supply	3/23/88	4/27/88	NRN
Economic Development Agency	3/24/88	4/27/88	NRN
Department of Public Works	5/12/88	5/13/88	NRN

Organizations and Agencies Consulted (Continued)

<u>Federal</u>	<u>Date of Comment</u>	<u>Date Comment Received</u>	<u>Response to Comment</u>
U.S. Army Corps of Engineers	5/03/88	5/09/88	NRN
U.S. Geological Services	-----	-----	-----
U.S. Coast Guard	-----	-----	-----
Department of Navy	3/22/88	3/23/88	NRN
Soil Conservation Service	4/18/88	4/29/88	NRN
U.S. Fish & Wildlife Service	5/02/88	5/03/88	NRN
<u>Private Agencies/Individuals</u>			
American Lung Association	-----	-----	-----
Maui Electric Company, Inc.	3/29/88	3/31/88	6/20/88
Dana Hall	5/08/88	5/10/88	6/20/88

LIST OF PREPARERS

Environmental Communications, Inc. - Technical Writers
 F. J. Rodriguez
 Taeyong M. Kim

Phillips, Brandt, Reddick - Landscape Architect
 Ron Mah
 Tod Black

Bishop Museum - Archaeological
 Aki Sinoto
 Paul L. Cleghorn
 Carol Kawachi

NRN: No Response Needed

XIV. COMMENTS AND RESPONSES DURING THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT REVIEW PERIOD

JOHN WAIHEE
GOVERNOR



SUZANNE D. PETERSON
CHAIRPERSON, BOARD OF AGRICULTURE

ROBERT V. TSUYUMURA
ACTING DEPUTY
TO THE CHAIRPERSON

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 So. King Street
Honolulu, Hawaii 96814-2512

Mailing Address:
P. O. Box 22159
Honolulu, Hawaii 96822-0159

(P)1232.8

May 5, 1988

COPY

MAR 22 1988

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

Subject: Draft Supplemental Environmental
Impact Statement for the
Makana-Keoneoio Road Cul-de-sacs Plan

We have reviewed the subject document and have no
comments to offer.

Very truly yours,

J. Rodriguez
TEUANE TOHINAGA
State Public Works Engineer

SS:jk
cc: Mr. F. J. Rodriguez

NO RESPONSE NEEDED

Mr. Christopher L. Hart, Director
Planning Department
County of Maui
200 South High Street
Wailuku, Maui 96793

Attention: Mr. John Min

Dear Mr. Hart:

Subject: Draft Supplemental Environmental Impact Statement
(DSEIS) for the Makana - Keoneoio Road Cul-de-sacs
Plan
Seibu Hawaii, Inc.
TMK: 2-1-05: 84, 86
2-1-06: 56, 57, 59
2-1-06: lot 1B
Makana, Maui

The Department of Agriculture has reviewed the subject
DSEIS and has no comments to offer.

Thank you for the opportunity to comment.

Sincerely,

Suzanne D. Peterson

for SUZANNE D. PETERSON
Chairperson, Board of Agriculture

cc: Mr. F. J. Rodriguez, Environmental Communications, Inc.
OEQC

NO RESPONSE NEEDED

MAR 24 1988



MAY 9 1988

JOHN WILSON
DIRECTOR OF HEALTH



STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 2075
HONOLULU, HAWAII 96811

April 5, 1988

JOHN C. LEWIS, M.D.
DIRECTOR OF HEALTH

IN REPLY, PLEASE REFER TO:
EPI-80

Engineering Office

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

Draft Supplemental Environmental Impact Statement
for the Makana-Keoneoio Road Cul-de-sacs Plan
Makana, Maui, Hawaii

Thank you for providing us the opportunity to review the above subject project.

We have no comments to offer at this time regarding this project.

Sincerely,

Jerry M. Matsuda
Major, Hawaii Air
National Guard
Contr & Engr Officer

Enclosure

cc: Mr. P.J. Rodriguez

NO RESPONSE NEEDED

APR 5 1988

MEMORANDUM

To: Mr. John Min, Planning Department
County of Maui

From: Deputy Director for Environmental Health

Subject: Draft Supplemental Environmental Impact Statement (DSEIS) for the
Makana-Keoneoio Road Cul-De-Sacs Plan, Makana, Maui, Hawaii

Thank you for allowing us to review and comment on the subject DSEIS. We have no comments to add at this time.

Bruce S. Anderson
BRUCE S. ANDERSON, Ph.D.

cc: Mr. F. J. Rodriguez ✓

NO RESPONSE NEEDED

APR 12 1988

P. W. KING
BARBARA KIM STANTON
LESLIE WATKINS
JANET DUNN
JUDY HARTLEY

**DEPARTMENT OF BUSINESS
AND ECONOMIC DEVELOPMENT**

HAWAIIAN ECONOMIC DEVELOPMENT AUTHORITY
100 SOUTH HIGH STREET, SUITE 1000, HONOLULU, HAWAII 96813
TELEPHONE: (808) 535-1234 FAX: (808) 535-1235

Ref. No. P-8346

May 9, 1988

FAX TO Eric Medina
For Rey Figueroa

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, Hawaii 96793

Dear Mr. Min:

Subject: Draft Supplemental Environmental Impact Statement for
the Makena-Keonoho Road Qui-de-Sacs Plan

We have reviewed the subject document and offer the following
comments relative to Hawaii Coastal Zone Management (CZM) Program objectives
and policies.

COASTAL ECOSYSTEMS

It is a CZM policy to preserve valuable coastal ecosystems of
significant biological or economic importance. Makena Beach is supported by a
primary beach berm that buffers the erosive forces of wave and wind, protecting
the adjacent mauka development of the Maui Prince Hotel. Beachgoers traversing
the berm from the proposed walkway would trample and damage the strand
vegetation and thus destabilize the protective berm. The proposed mauka-makai
walk will help to limit this damage. However, other structures (e.g., wiring,
electrical fixtures, a beach activities shelter for the hotel) are being
designed to be situated on the berm and may have adverse impacts. Therefore,
the document should assess the need for and the impacts of these structures
and examine their suitable placement at other sites, particularly within the
hotel grounds mauka of the pedestrian walkway.

Relative to this same policy, there is also a concern that artificial
lighting too close to the ocean may adversely affect breeding sea turtle
populations. Hatchlings are known to orient to starlight as a means of finding
their way back to the sea. As illumination on the crest or makai of the berm
will alter the natural light pattern, sea turtles may become disoriented,
migrate in the wrong direction, and ultimately be mortally affected. The
document should assess the suitability and historical use of Makena Beach by
the sea turtles. If there is a finding of actual or potential use, the
document should also assess the effect of berm lighting on their habitat and
the means by which those impacts might be mitigated.

Mr. Jon Min
Page 2
May 9, 1988

COASTAL HAZARDS

A CZM objective is to reduce hazards to property from storm waves
and erosion. Waves and wind have shaped Makena Beach and the backing berm
into its present configuration. As these forces are in a constant state of
flux, it is important to consider the dynamics of coastal geomorphology when
designing and constructing shoreline structures. In this regard, there is a
question as to whether the proposed lighting and concrete walkway would be
appropriate uses. The document should assess this relationship for all of the
proposed structures to be sited on the beach or berm, and examine reasonable
alternatives to them.

We appreciate this opportunity to comment on the subject document.

Sincerely,
Roger A. Ulveling
Roger A. Ulveling

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

June 20, 1988

Mr. Roger A. Ulveling, Director
Department of Business and
Economic Development
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Ulveling:

Subject: Makana-Keoneolo Road Cul-de-sacs Plan Draft Supplemental
Environmental Impact Statement

We are in receipt of your department's comments dated May 9, 1988 on the Draft Supplemental Environmental Impact Statement prepared for the Makana-Keoneolo Road Cul-de-sacs Plan. We note that we were not provided a copy of your agency's comments as requested by the Office of Environmental Quality Control in their transmittal dated March 18, 1988. We regret our late response to your comments since we did not obtain your comments from John Min (Mau County Planning Office) until today, May 16, 1988.

The comments have been reviewed by the applicant and our office and we respond to your comments as follows:

1. Coastal Ecosystems

Seibu Hawaii, Inc. shares your concern over the fragile nature of the existing sand berm fronting the Mau Prince Hotel. The landscape architectural firm of Phillips, Brandt, Reddick has been retained to design the master planned landscaping to be implemented on the berm. There is equal concern shared by their staff on this valuable beach amenity and their recommendations for the landscape design and the construction methodology reflect this concern. Mr. Ron Mah (Phillips, Brandt, Reddick) advises that the light standards will be equal in size and bulb wattage (60 watts) to the lighting on footpaths on the hotel grounds proper. Further, Mah states that the footpath will aid in the stabilization of the sand dune by directing traffic to a defined pathway, as opposed to the current practice of random walkways throughout the entire berm. Finally, the depth of dune penetration for installation of underground wiring and pipelines will be limited to approximately 12 inches and should not impact the integrity of the dune.

Your staff may be assured that all proposed improvements will be designed to impact the beach sand dune in the most insignificant manner and not to penetrate the depths of the sand dune, thus maintaining the integrity of this

1146 Fort St Mall, Suite 200 • P. O. BOX 134 • HONOLULU HAWAII 96809 • TELEPHONE (808) 537-9391

Mr. Roger A. Ulveling
June 20, 1988
Page 2

valuable asset. On the subject of the proposed lighting for the foot paths, the candlepower of the lighting is not planned to be obtrusive or beacon-like; the light coloring will be a muted yellow-white and the shielding of the light standards will direct the light downward on the foot paths, and not reflect upward or towards the beach. This will mitigate impacts on the breeding sea turtle populations at Makana, if there are any. Telephone discussion with Andy Yuen of the Federal Fish & Wildlife Service on this subject did not reveal any findings of definitive proof of breeding sea turtles at Makana.

Discussions with Dr. Bill Gilmartin and Gene Nitta, National Marine Fisheries Endangered Species Experts provided little additional information. Interest expressed was on whether sea turtles did indeed frequent Makana Beach for breeding and nesting purposes. The National Marine Fisheries is unaware of turtle nesting along the shoreline fronting Makana. Sightings of turtles on shore have been reported on Kahoolawe and also further down the coastline at the beach area where nude sunbathing takes place. It was their collective judgement that by planning our footpath lighting to be behind the sand berm, and the lack of data on turtles actually breeding and nesting at Makana Beach, the artificial impacts would be negligible. (Dr. George Balass was on a cruise and not available.) It is Seibu Hawaii, Inc.'s position that with the combined landscape planning, specific attention to be paid to the strength of foot path lighting, and the dearth of data from agencies and authorities on the breeding habits of sea turtles at Makana, that the potential problem is adequately resolved.

Coastal Hazards

The concerns over the design and construction of the proposed improvements is commendable and we would assure your office that it is not the intent of Seibu Hawaii, Inc. to negatively impact their valuable beach frontage amenity. It is their position that the design as proposed by the landscape architects, will impact this site in a manner much less than exists on the shoreline of many beach front hotels throughout the State. We would welcome your review of the finished project to confirm our position.

Thank you for your comments and continuing concern.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:tl

JOHN WAINEL
Governor of Hawaii



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

P O BOX 621
HONOLULU, HAWAII 96808

WILLIAM W. PATY, CHAIRPERSON
Board of Land and Natural Resources

LIBERT S. LANGRISH
SECRETARY

AGRICULTURE DEVELOPMENT
NATURAL RESOURCES
CONSERVATION AND
ENVIRONMENTAL AFFAIRS
CONSERVATION AND
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DOC. NO.: 3207E
FILE NO.: 88-428

APR 21 1988

Mr. John Min
County of Maui
Department of Planning
200 South High Street
Wailuku, Maui 96793

Dear Mr. Min:

SUBJECT: Makana-Keoneolo Road Cul-de-Sacs Draft Supplemental
Environmental Impact Statement (EIS)

In response to your request, we have reviewed the document cited above and have the following comments to offer.

This Draft EIS includes a report on an archaeological surface and subsurface study conducted by Bishop Museum (Appendix A). It also includes a letter from the Bishop Museum regarding the archaeological sensitivity of the proposed beach access no. 3 (Appendix B).

Two historic sites are in the project area -- 1007 in the parking lot and 88-237 in the beach landscaping area. The surface survey and shovel probes in the cul-de-sac parcel indicate the absence of historic sites in this parcel.

It appears that the study has collected adequate information to tentatively assess the significance of site 1007 (Table 1 of Appendix A), and adequate information was previously collected to assess the significance of 88-237. We concur that site 1007 is significant, but the historic preservation laws require significance to be assessed for the site and not its constituent features. Thus, the consulting archaeologist's assessments need to be slightly revised. Also, we disagree on the criteria used. Based on the information available, we believe that site 1007 is significant only for its information content (d). Site 88-237 does not have its significance evaluated, but we believe it too is significant solely for its information content. The EIS should be revised to correct these assessments to be included under The Environmental Setting (V-7 - V-9).

Mr. John Min

- 3 -

DOC. NO.: 3207E

The Draft EIS indicates that only Feature 5 of site 1007 will be impacted and that 88-237 will not be impacted. We agree with the first conclusion. However, the landscaping and construction of the low lava rock wall appear likely to adversely affect the surface midden component of 88-237. We believe that the EIS should be revised to indicate that 88-237 will be affected.

The Draft EIS presents mitigation measures in which Feature 5 of 1007 will undergo archaeological data recovery. We agree with this plan. However, since 88-237 will be affected and since only surface collection of artifacts was conducted in 1978, we recommend that data recovery in the form of monitoring be conducted in 88-237 to the west of the concrete foundation. We believe that the recommendation that a professional archaeologist be contacted if subsurface features are exposed is unlikely to be a satisfactory mitigation approach, because construction crews will have problems adequately identifying archaeological subsurface features.

In sum, we recommend that the significance evaluations, the impact assessments, and the mitigation measures in the EIS be slightly revised to handle impacts to sites 1007 and 88-237. Importantly, mitigation should include the following work: 1) data recovery of Feature 3 in the proposed parking lot and 2) monitoring during landscaping work in the area west of the concrete foundation.

Thank you for the opportunity to comment on this project.

Very truly yours,

WILLIAM W. PATY, Chairperson
Board of Land and Natural Resources

cc: Historic Sites

APR 21 1988

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

June 20, 1988

Mr. William W. Paty, Chairperson
Department of Land and Natural
Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Paty:

Subject: Makena-Keoneo Road Cul-de-sacs Plan Draft Supplemental
Environmental Impact Statement

We are in receipt of your department's comments dated April 21, 1988 on the Makena-Keoneo Road Cul-de-sacs Draft Supplemental Environmental Impact Statement (DSEIS). We have reviewed these comments with the applicant and the retained archaeological consultant, the Bishop Museum which is included as follows: The report prepared by the Bishop Museum which is included as Appendix A has been revised to reflect the changes addressing the comments regarding the significance of evaluations for the site and the criteria. We are taking the liberty of enclosing these revised pages with this response, as well as including them in the Appendix A report.

Aki Sinoto from the Bishop Museum advises that regarding Site 237, Ms. Ann'e Griffin from your Historic Sites staff visited the site with Mr. Sinoto on Monday, April 11, 1988; further, this subject was also discussed with Ms. Griffin on May 4, 1988 and there was agreement that if the developmental activities consisted primarily of filling prior to utility related excavations, full-time monitoring would not be required since the midden scatter (Feature 2) is largely a surface scatter. It was felt, however, that if excavation below current surface is planned, monitoring should be conducted for those areas. Feature 1, the concrete slab will not be affected. The Museum's letter dated January 28, 1988 did address the mitigation concerns. There is agreement that Site 237 is significant based on the National Register Criterion D, the potential to yield more data.

The Museum notes for your information that the feature of Site 1007 impacted by the proposed parking lot and recommended for intensive data recovery is Feature 3, not 5.

Finally, in the 6th paragraph, the necessity for monitoring would be based on the nature and location of the proposed development activities. We would request on the recommendation of the Museum that your department view favorably the assignment of a non-archaeologist, with authority, to be the onsite monitor who stops construction work to notify the archaeologist. This request is consistent with the Museum's recommendations that the construction crews should not monitor their own work.

1146 Fort St Mall, Suite 200 - P O BOX 138 - HONOLULU HAWAII 96809 - TELEPHONE (808) 521 4381

Mr. William W. Paty
June 20, 1988
Page 2

We regret the delays in responding to your comments but we did not receive a copy of this advice to the Maui County Planning Department as required by the Office of Environmental Quality Control in their distribution transmittal dated March 18, 1988 to all reviewing agencies. Our copy was provided by John Min of Maui County Planning Department.

We trust that we responded adequately and thank you for your comments and continuing interest.

Very truly yours,



F. J. Rodriguez

FJR:ls
Enclosure

1987 topographic map provided by the client) the school building overlaps portions of the Feature 5 cistern (Fig. 3). These data suggest that the cistern was most likely not associated with the school and probably post-dates the abandonment of the school.

The interpretation of Features 3 and 4 is more difficult. The formal arrangement of these similar structures incorporating depressions, luaber, and low foundations, suggest possible function as toilets. The presence of two such structures support the possibility that these may indeed be associated with the school as boys' and girls' toilets, however, further work is required to substantiate this interpretation. Table 1 presents a summary of descriptive data and the recommended mitigation procedures for individual features and the Federal significance criteria. Site 1007 is evaluated as significant under Criterion D.

RECOMMENDATIONS

No further work is recommended for the cul-de-sac parcel. Although in sand dune environments, the potential for unmarked burials is high, the sand in this particular area is shallow. Thus, although no monitoring is recommended during ground altering activities, should any cultural remains be encountered, activities should be temporarily halted in the vicinity until a qualified archaeologist can be retained to implement proper mitigation procedures.

The following recommendations are presented for the Makena

School parcel:

- Feature 1) No further work is recommended for this western boundary wall remnant.
- Feature 2) This wall should be preserved in situ and used as the north boundary wall for the parking lot. No further work is necessary, if in situ preservation is implemented.
- Feature 3) This platform will be destroyed by the parking lot if the current design configuration is retained. If destruction is imminent, intensive data recovery

Table 1

SUMMARY OF FEATURES IN THE MAKENA SCHOOL PARCEL HISTORIC COMPLEX
 BISHOP MUSEUM SITE 50-Ma-88-252
 STATE SITE 50-50-14-1007

Feat. No.	Description/Function	Condition	Horizontal Extent	Estimated Age	Deposit Est. Depth	Affected by Prop. Devpt.	Recommendation/Mitigation
1	Stacked wall/boundary	Poor	c. 80m	Hist/Modern	N/-	Yes	--
2	Core-filled wall boundary	Good	76m+	Prehist/Hist	N/-	No	Preserve
3	Platform/Foundation for toilet	Fair	8.1 sq m	Hist/Modern	Y/ 0.30m	Yes	Intensive Data Recovery
4	Platform/Foundation for toilet	Fair	9.9 sq m	Hist/Modern	Y/ 0.30m	No	Preserve
5	Circular Cemented pit/Cistern	Good	100 sq m	Hist/Modern	N/-	Partially	Partial Preservation

National Register Significance Assessment Criteria:

Criterion A specifies association with events or broad patterns important in the history of an area (e.g., Contact, the development of the state system of government, the expansion of agriculture into upland areas).

Criterion B reflects association with persons important in the history of an area (e.g., Queen Lili'uokalani).

Criterion C applies to sites that reflect architectural achievements (e.g., extensive terracing, certain roads and historic-period buildings).

Criterion D specifies that the site has yielded or has the potential to yield information significant for our understanding of traditional culture, history, prehistory, and/or foreign influences on traditional culture and history.



JOSEPH K. CONANT
Executive Director

STATE OF HAWAII
Department of Business and Economic Development
Housing Finance and Development Corporation

P. O. BOX 17787
HONOLULU, HAWAII 96717

TO: 88:PING/1470JT

March 30, 1988

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

Re: Draft Supplemental Environmental Impact Statement
(EIS) for the Makena-Keoneoio Road Cul-de-sacs
Plan

Thank you for the opportunity to review the draft
supplemental EIS for the subject project. We have no comments
to offer.

Sincerely,

JOSEPH K. CONANT
Executive Director

cc: Mr. F. J. Rodriguez

NO RESPONSE NEEDED

APR 5 1988



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
100 LAKOLAH BLVD., SUITE 1300
HONOLULU, HAWAII 96813

(808) 548-9100
(808) 946-7642

March 22, 1988

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, HI. 96793

Dear Mr. Min:

SUBJECT: Draft Supplemental EIS: Makena-Keoneoio Road Cul-de-Sacs
Plan, Makena, Maui. TRK: 2-1-05: 84 and por. 86

Thank you for the opportunity to comment on the proposed undertaking.

The proposal indicates that additional archaeological study will be
done in the future. Please send our office a copy of the written report
that results.

Sincerely,

Kamaki A. Kanahela III
Administrator

NO RESPONSE NEEDED

APR 27 1988



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7101

May 9, 1988
RE:0496

Mr. John Min
Maui Planning Department
County of Maui
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

Draft Supplemental Environmental Impact Statement
Makena-Keoneoio Road Cul-de-sacs Plan
Makana, Maui

The Environmental Center has reviewed the above referenced Draft Supplemental Environmental Impact Statement (SEIS) with the assistance of Jon Matsuoka, Social Work; P. Bion Griffin, Anthropology; Lili Kame'elehewa, Hawaiian Studies; and Nancy Kanyuk, Environmental Center. The project proposes the construction of two permanent cul-de-sacs, at the north and south ends of the Makena-Keoneoio road parcel and includes an asphalt turn around surface, concrete curbs, and 30 paved and marked parking stalls on a portion of THK:2-1-05:84 south of the south cul-de-sac.

General Comments

We are aware that the "new" plan for the Makena-Keoneoio Road Cul-de-sacs has been developed as a way to continue pedestrian access along the Makana shoreline by creating a full public pedestrian walkway. This plan also has the advantage of reducing impacts to the sensitive dune area by eliminating the construction of a public walkway along the dunes.

Archaeology

The discussion of the archaeological significance of this area is inconsistent and therefore inadequate as presently drafted. The supplemental Draft EIS tends to beg the issue of archaeological and/or cultural concerns and neglects to include specific archaeological information germane to the discussion. For example, Marian Kelly's Background History of Alanui 'Aupuni Honua'ala, Maui should have been included, as it was in the original final EIS. It is only by overlooking

U-10-1-1988-05-09-001

AN EQUAL OPPORTUNITY EMPLOYER

MAY 10 1988

Mr. John Min

-2-

May 9, 1988

this comprehensive study of the Makana area that one could arrive at the conclusion that there is "lack of evidence" for the existence of the traditional Hawaiian trail known as the Pi'ilani Highway. The field study conducted by Bishop Museum in February 1987 (Appendix A) provides findings inconsistent with the study conducted by Marian Kelly in January 1987, that was included in the Final EIS. We can ascertain from maps, oral testimony and land deeds that a trail has existed since 1845, and most probably much earlier than that. Although the February 1987 archaeological reconnaissance survey yielded no archaeological evidence of a Hawaiian trail it would seem imprudent to deny the validity of other historical sources in assessing the project. Additionally, simply because many of the parcels exhibit "extensive disturbance" (p. V-8) is no reason to denigrate their potential archaeological importance.

Our reviewers would also question the decision that the site should not be considered "culturally significant" (p. VI-4) and would strongly recommend that a qualified archaeologist be on hand when any subsurface excavations are conducted. This is especially important when one recognizes that "in sand dune environments the potential for unmarked burials is high" (p. VII-4). Hence the plan to put underground electrical lines, gas lines, a concrete walkway, a beach activity center, and a water line as well as landscaping should be implemented only under the direct supervision of a qualified archaeologist.

Thank you for the opportunity to comment on this supplemental Draft EIS. We hope our comments will be helpful in preparing the final document.

Yours truly,

Jaquelin Miller
Jaquelin Miller
Associate Environmental Coordinator

cc: OEQC
L. Stephen Lau
Environmental Communications, Inc.
Jon Matsuoka
P. Bion Griffin
Lili Kame'elehewa
Nancy Kanyuk



ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

June 20, 1988

Ms. Jacquelin Miller
Associate Environmental Coordinator
Environmental Center
University of Hawaii at Manoa
Crawford 317
2550 Campus Road
Honolulu, Hawaii 96822

Dear Ms. Miller:

Subject: Makana-Keoneolo Road Cul-de-sacs Plan Draft Supplemental
Environmental Impact Statement

We are in receipt of your Center's comments dated May 9, 1988 on the Draft Supplemental Impact Statement (DSEIS) prepared for the Makana-Keoneolo Road Cul-de-sacs Plan. The comments have been reviewed by the applicant and the Bishop Museum who conducted the archaeological work for the project. Our responses reflect the collective thinking of the Museum and our office.

We share the Museum's position that your comments are not "germaine" to this Draft Supplemental EIS since neither Kelley's history report nor the Museum's February 1987 report were a part of the Draft Supplemental EIS. Furthermore, since this document is a supplement to the original EIS, no redundant effort was made to repeat everything in the original EIS. In fact, the archaeological undertakings concentrated only on the proposed parking lot, south cul-de-sac, and beach access/park areas. An examination of the maps provided would also show that major portion of the south cul-de-sac parcel, including the tested areas, is located west of the road alignment.

Regarding the allegation that archaeological importance was denigrated, the possible confusion over "archaeological importance" with "cultural importance" is perhaps responsible for the misunderstanding. The Museum is on record that they have never denigrated the archaeological importance of anything. From an objective archaeological perspective, due to the lack of archaeological evidence there is nothing to denigrate.

The Museum also takes exception to the practice of quoting incompletely from Museum material. The missing material left unquoted was, "the sand in this particular area is shallow." This is fact since Sinolo tested in the area, and knowing the sensitivity of the project, the Museum exercised extreme caution in pointing out the possibility of burials, as unlikely as they may be. There is consensus that an onsite monitor to stop work and notify the archaeologist is considered to be appropriate.

Ms. Jacquelin Miller
June 20, 1988
Page 2

We regret that misunderstandings exist of the veracity or understanding of the importance of the work performed for this Draft Supplemental EIS by the retained consultants, the Bishop Museum. We felt it necessary to make their position known in this response to your Center's comments.

Thank you for your comments and continuing interest.

Very truly yours,



F. J. Rodriguez

FJR:is
cc: L. Stephen Lau

HANNIBAL TAVARES
Mayor



COUNTY OF MAUI
DEPARTMENT OF PARKS AND RECREATION

1190 Keolu Avenue
Wailea, Maui, Hawaii 96793

April 19, 1988

Mr. John Min
Planning Department
County of Maui
200 South High Street
Waialuku, Maui, Hawaii 96793

Dear Mr. Min:

SUBJECT: DRAFT EIS FOR THE MAKENA-KEONEOIO
ROAD CUL-DE-SACS PLAN

We have reviewed the above referenced draft EIS and have no objections or comments to submit.

Thank you for the opportunity to review this matter.

Please feel free to contact me should you have any questions.

Very truly yours,

Marilyn Moniz-Kahoonohiano

MARILYN MONIZ-KAHOONOHIANO
Director of Parks & Recreation

cc: Mr. F. J. Rodrigues
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

NO RESPONSE NEEDED

APR 21 1988

MARILYN MONIZ-KAHOONOHIANO
Director

KEHA KAWAUCHI
County Director



DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI

P. O. BOX 1109
WAILUKU, MAUI, HAWAII 96793

March 23, 1988

Mr. John Min
Maui Planning Department
200 South High Street
Waialuku, Maui, Hawaii 96793

Dear Mr. Min:

Subject: Draft Supplemental Environmental Impact Statement
for the Makena-Keoneoio Road Cul-de-sacs Plan

Thank you for the opportunity to review and comment on the draft supplemental Environmental Impact Statement for the Makena-Keoneoio Road Cul-de-sacs Plan.

We are of the opinion that the proposed project will not affect our existing water system in the area.

If you have any question or require additional information, please feel free to contact us.

Sincerely,

Vince G. Baglyd, Jr.
Vince G. Baglyd, Jr., Director

VGB/ao

cc: DWS Engr.

NO RESPONSE NEEDED

"By Water All Things Find Life"

APR 27 1988



P. 3/3
J.P.H.

16 '88 08146 R. SATO & ASSOC. - HUI (688) 2445383

HANNIBAL TANARES
Mayor
UC



COUNTY OF MAUI
OFFICE OF ECONOMIC DEVELOPMENT
WAILUKU, MAUI, HAWAII 96793
TELEPHONE 244-7710

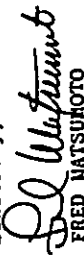
March 24, 1988

Mr. John Min
Planning Department
County of Maui
200 South High Street
Wailuku, HI 96793
Dear Mr. Min:

Subject: Draft Supplemental Environmental Impact Statement for the Makena-Keoneoio Road Cul-De-Sacs Plan

The Office of Economic Development have reviewed the Draft Supplemental Environmental Impact Statement and find that, in general it has adequately identified and assessed the major environmental impacts which can be anticipated to result from the proposed project.

We have no other comments to offer at this time; however, we thank you for the opportunity to review the Supplemental Environmental Impact Statement.

Sincerely,

FRED MATSUMOTO
Economic Development Coordinator

cc: Mr. F. J. Rodrigues
Environmental Communications, Inc. E.D.C.
P. O. Box 536
Honolulu, HI 96809

NO RESPONSE NEEDED

APR 27 1988

HANNIBAL TANARES
Mayor
ALVIN K. FUKUNAGA
Deputy Mayor
SALANI KASHIRO, P.E.
Deputy Director
GEORGE GUYA
Highway Division
FRED ANJAL, P.E.
Engineering Division
EASIE MILLER, P.E.
Waste Management Division
ASAOH SUKUMOTO, P.E.
Lands Use and Code Administration



COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
300 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793

May 12, 1988

MEMO TO: Christopher Hart, Planning Director
F R O M: Alvin K. Fukunaga, Director of Public Works
SUBJECT: Draft Supplemental Environmental Impact Statement for the Makena-Keoneoio Road Cul-de-sacs Plans at Makena, Maui.

We have reviewed the above request and have no comments to offer at this time.

AS/ms

NO RESPONSE NEEDED

RECEIVED
MAY 13 3 16 AM '88
COUNTY OF MAUI



DEPARTMENT OF THE ARMY
U. S. ARMY ENGINEER DISTRICT, HONOLULU
BUILDING 230
FT. SHAFTER, HAWAII 96859 -5440

May 3, 1988

REPLY TO
ATTENTION OF:

Planning Branch

Mr. John Min
Maui Planning Department
288 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement (DSEIS) for the Makena-Keoneolo Road Cul-de-sacs Plan, Makena, Maui, Hawaii. The following comments are offered:

- a. Since no work is to be performed in waters of the United States or adjacent wetlands, a Department of the Army permit is not required.
- b. The discussion of Flood Insurance Study designations in the DSEIS (page V-5, paragraph B.2) appears to be accurate.

Sincerely,

Clarence Fujii
Acting Chief, Engineering
Division

Copy furnished:

Mr. F.J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

NO RESPONSE NEEDED

MAY 9 1988



DEPARTMENT OF THE NAVY
COMMANDER
NAVAL BASE PEARL HARBOR
BOX 110
PEARL HARBOR, HAWAII 96860-5020

REPLY REFER TO

5090 (248)
Ser NSB/736

22 MAR 1988

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Min:

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
MAKENA-KEONEOLO ROAD CUL-DE-SACS PLAN

The Draft Supplemental Environmental Impact Statement for the Makena-Keoneolo Road Cul-de-sacs Plan has been reviewed and we have no comments to offer. Since we have no further use for the EIS, it is being returned to the Office of Environmental Quality Control.

Thank you for the opportunity to review the Draft.

Sincerely,

W. B. El
Lieutenant Colonel, Engineer
Department of the Navy

Enclosure

Copy to:
Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Office of Environmental Quality Control

NO RESPONSE NEEDED

MAR 23 1988

UNITED STATES
DEPARTMENT OF
AGRICULTURE

SOIL
CONSERVATION
SERVICE

P. O. BOX 50004
HONOLULU, HAWAII
96850

April 18, 1988



United States Department of the Interior

FISH AND WILDLIFE SERVICE
300 ALA MOANA BOULEVARD
P. O. BOX 50187
HONOLULU, HAWAII 96810

ES
Room 6307

MAY 2 1988

Mr. John Min
Maui Planning Department
200 South High Street
Wailuku, HI 96793

Dear Mr. Min:

Subject: Draft Supplemental Environmental Impact Statement (DEIS) -
Makana-Kaunaoa Road Cul-de-sacs Plan, Makana, Maui, Hawaii

We have no comments to offer at this time, however, we would appreciate the opportunity to review the final EIS.

Sincerely,

RICHARD N. DUNCAN
State Conservationist

cc: Mr. F. J. Rodriguez, Environmental Communications, Inc., P.O. Box 536,
Honolulu, HI 96809

NO RESPONSE NEEDED

Mr. John Min
Maui County Planning Department
200 South High Street
Wailuku, Hawaii 96793

Re: Draft Supplemental Environmental Impact Statement for the
Makana-Kaunaoa Road Cul-de-sacs Plan, Makana, Maui, Hawaii

Dear Mr. Min:

We have reviewed the referenced Draft Supplemental Environmental
Impact Statement, and have no comments to offer at this time.

We appreciate this opportunity to comment.

Sincerely yours,

Ernest Kosaka, Field Supervisor
Office of Environmental Services
Pacific Islands Office

cc: Environmental Communications, Inc.

NO RESPONSE NEEDED



APR 29 1988

MAY 3 1988

Save Energy and You Serve America!

Maui Electric Company, Ltd. • 210 West Kamehameha Avenue • PO Box 398 • Kahului, Maui, HI 96732-0398 • (808) 871-8461

ENV
M-W



March 29, 1988

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, HI 96809

Dear Mr. Rodriguez:

Subject: Draft Supplemental Environmental Impact Statement
for the Makana-Keoneolo Road Cul-de-sacs Plan

The following are our comments to the Draft Supplemental EIS for the subject project:

1. MECO has no facilities within the road closure area.
2. Pending receipt of civil plans for the road improvement to each cul-de-sac, MECO may have to relocate overhead, 4 kv distribution lines that are within the existing unimproved roads.

If you have any questions regarding this matter, please feel free to call Steve Kealoha at 871-8360.

Sincerely,

Calvin A. Kuwanoo
Manager, Engineering

CAK:rt

An HEI Company

MAR 31 1988

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

June 20, 1988

Mr. Calvin A. Kuwanoo
Manager, Engineering
Maui Electric Company, Ltd.
P.O. Box 398
Kahului, Maui, Hawaii 96732-0398

Dear Mr. Kuwanoo:

Subject: Draft Supplemental Environmental Impact Statement for the
Makana-Keoneolo Road Cul-de-sacs Plan

We have received your comments dated March 29, 1988 on the Draft Supplemental Environmental Impact Statement (DSEIS) prepared for the Makana-Keoneolo Road Cul-de-sacs Plan. We have provided these comments to the applicant and we respond as follows:

1. We acknowledge the advice that Maui Electric Company has no facilities within the road closure area.
2. Please be assured that final civil engineering plans will be provided to all affected parties including Maui Electric Company at the time formal construction permit applications are filed with the County.

Thank you for your timely comments and we trust that we have responded adequately.

Sincerely,

F. J. Rodriguez

FJR:ls
cc: Roy Figueiroa - Selbu Hawaii, Inc.

1146 Fort St Mall, Suite 200 • P O BOX 536 • HONOLULU HAWAII 96809 • TELEPHONE (808) 531-8381



ISAAC DAVIS HALL

ATTORNEY AT LAW
2087 WELLS STREET
WAILUKU, MAUI, HAWAII 96793
(808) 244-8017

May 8, 1988

Mr. F. J. Rodriguez
Environmental Communications, Inc.
PO Box 536
Honolulu, HI 96809

Re: Draft Supplemental Environmental Impact Statement
for Makena-Keoneoio Road Cul-de-sacs Plan

Dear Mr. Rodriguez:

In discussions with Mr. Roy Figueiroa, Project Coordinator for Seibu Hawaii, Inc., it was agreed that certain language contained in the Draft Supplemental Environmental Impact Statement ("Draft Supplemental the Makena-Keoneoio Road Cul-de-sacs Plan") for Hui Alanui o Makena requested that these changes be made in keeping with the Settlement Agreement entered into by Seibu Hawaii, Inc. and the Hui in July 1987. A copy of the text of the Settlement Agreement is attached to this letter as Exhibit "A".

The changes to be reflected in the Final Supplemental Environmental Impact Statement include the following:

- a) Page I-4, the second sentence of the paragraph in the middle of the page, which begins "No evidence...": delete the words "historical or prehistorical" from that sentence.
- b) Page V-6, subsection D. Archaeological and Historical Characteristics: the paragraph that appears at the top of page V-10 shall be moved to page V-6 and inserted as the second paragraph under subsection D. This paragraph reads in full:
"The Hui Alanui o Makena has stated that the Makena-Keoneoio Road has evolved from the Piliiani Trail built in the sixteenth century and provides continuous access along the entire Makena coastline. The applicant has acknowledged this position and has subsequently submitted the proposed action

which after review and discussion with the Hui Alanui o Makena, addresses its concerns and needs."

- c) Page V-6, subsection D. Archaeological and Historical Characteristics, 1. Historical Characteristics: the second sentence of the second paragraph ("In contrast to overland...") shall be deleted.
 - d) Page VIII-1, Section VIII. The Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity and Irreversible/Irretrievable Commitments of Resources: the second sentence of the first paragraph ("The portion of road...") shall be deleted.
 - e) Page X-1, section X. Summary of Unresolved Issues: the second sentence of the second paragraph ("It should be noted...") shall be deleted.
- In Appendix A to the Draft Supplemental EIS, on page 11, it is stated that "[o]ral informant interviews are recommended prior to any further fieldwork" on the old Makena School site. Hui Alanui o Makena concurs in this recommendation and members of the Hui who attended Makena School and are knowledgeable about the site have been identified in Marion Kelly's cultural study "Background History of Alanui Aupuni, Honua'ula, Maui", dated January 10, 1987 and included in full in the comments section of the Final EIS for the previous Makena-Keoneoio Road Cul-de-sacs Plan published in February 1987.
- Many of the comments submitted regarding the Draft EIS prepared earlier are still important criticisms of this Draft Supplemental EIS. Those comments which are not antithetical to the Settlement Agreement between Seibu and the Hui are hereby incorporated by reference, particularly the Kelly Report cited above.

- Malama Makena,

Dana Naone
Dana Naone Hall

MAY 10 1988

SETTLEMENT AGREEMENT

The following Settlement Agreement, entered into this _____ day of July, 1987, by and between HUI ALANUI O MAKENA, a Hawaii nonprofit corporation, CHARLES P. KEAU, EDWARD CHANG, ESTHER K. CAMPBELL, DANA HAONE HALL, NED I. GOODNESS, LESLIE KULOLOIO, HELEN PETERS, ALICE KULOLOIO, MAIPELA WONG, ALICE KAPOHAKIMOHEWA and HOKULANI HOLT PADILLA, all residents of the County of Maui, State of Hawaii (hereinafter said nonprofit corporation and individuals collectively referred to as the "Hui") and SEIBU HAWAII, INC., a Hawaii corporation, SEIBU FUDOSAN KABUSHIKI KAISHA and PRINCE HOTELS OF HAWAII, INC. (aka SEIBU HAWAII, INC.) (hereinafter collectively referred to as "Seibu").

W I T N E S S E T H :

WHEREAS, the Hui is made up of a number of concerned individuals either residents of or with ties to the Makena area on the Island of Maui;

WHEREAS, Seibu is the developer of the Makena Resort, a one thousand acre resort and residential destination area at Makena and is concerned with the proper and careful development of the same taking into consideration the concerns and recommendations of other parties with interest in Makena;

WHEREAS, for the past several years, the Hui and Seibu have disagreed in a number of areas regarding the development of the Makena Resort, specifically including, but not being limited to, the closure of a portion of the Makena-Keonecio Road fronting

the Maui Prince Hotel, and other land tenure and public access questions in the Makena area;

WHEREAS, the parties acknowledge that development of major resorts, such as Seibu's Makena project, generates impacts on areas which require cooperation between developers and the community to mitigate impacts and, if necessary, to avoid them;

WHEREAS, in 1969 the Kihei 701 Plan was adopted by the County of Maui, which Plan included recommendations for land utilization in the Kihei-Makena area;

WHEREAS, said conflicts have resulted in the following civil actions between the parties: (a) Civil No. 85-0053(1), Leslie Kuloio et al. vs. Department of Land and Natural Resources, State of Hawaii et al., (b) Civil No. 85-0187(1), Hui Alanui O Makena et al. vs. County of Maui et al., (c) Civil No. 86-0237(1), Hui Alanui O Makena et al. vs. Planning Commission, County of Maui et al., (d) Civil No. 86-0364(1), George P. Ferreira et al. vs. Seibu Hawaii, Inc. et al., (e) Civil No. 87-0153(1) Hui Alanui O Makena et al. v. Planning Commission, County of Maui et al., and (f) In the Matter of the Application of Seibu Hawaii, Inc. for a Special Management Area Permit before the County of Maui Planning Commission, 86/SHA-10.

WHEREAS, through the assistance and mediation efforts of the Honorable Elmer F. Cravalho, former Mayor of the County of Maui, the parties have negotiated in good faith and with a common concern and respect for the historic and cultural values of native Hawaiians in the Makena area; and

EXHIBIT A

WHEREAS, through the efforts of the mediator, the parties have hereto come to agreement on the future development of the Makana Resort and the protection and preservation of historic and cultural resources in the Makana area;

NOW, THEREFORE, the parties hereby agree as follows:

1. The Hui has stated that the Makana-Keoneolo Road has evolved from the Pilihi Trail built in the sixteenth century and provides continuous access along the entire Makana coastline, facilitating the exercise of fishing and shoreline gathering rights and is of cultural and historic importance to native Hawaiians. Seibu acknowledges and respects the position of the Hui and accordingly will take the following steps:

- (A) Seibu agrees that it will as soon as practicable improve to county subdivision standards that portion of the Makana-Keoneolo Road designated Part 1-A as set forth in Exhibit "A".
- (B) Seibu agrees that it will improve that portion of Makana-Keoneolo Road designated Part 1-B as set forth in Exhibit "A", by grading and placing gravel on it as soon as practicable.
- (C) Seibu further agrees that it shall not initiate nor support any efforts to abandon, dispose of, and/or close any further portions of the Makana-Keoneolo Road. Seibu further agrees that should such portions ever become the property

of Seibu, such portion(s) shall remain a public road and be retained as such.

It is further agreed between the parties:

(D) Seibu shall keep open the section of the Makana-Keoneolo Road designated Part 1-D as set forth in Exhibit "A" in perpetuity in its present location as a twenty foot wide, stone-paved walkway for public use at all times.

(E) The development and construction of the walkway shall include cul-de-sacs on its northern and southern ends and shall be determined in consultation with the Hui and shall be constructed at the sole cost of Seibu. Such cul-de-sacs shall be enlarged to practicable extents beyond the sizes presently planned by Seibu so as to provide vehicular turn around circles with landscaped centers and short term parking for beach drop-off.

(F) Further, the parties shall consult and agree upon language to be contained in signs and plaques about the road.

- (G) Such section shall be used as a walkway only.
2. To ensure public access to and use of Naupaka Beach, also known as Maluaka Beach, in addition to public beach access undertakings which Seibu has already agreed to and has or will develop, Seibu agrees to make available additional lands on its property at the south end of Naupaka Beach for public beach

Landing Road which traverses its property in Makena. If such road is opened, Seibu further agrees that it shall construct its portion of the road to County of Maui subdivision standards in the present alignment of the Ulupalakua-Makena Landing Road, as it may be modified by topography in the area and general plan and zoning boundaries.

4. A §501(c) non-profit Hawaii corporation shall be established which shall have the primary function of protecting and preserving native Hawaiian culture and traditions, particularly in Makena and the Honouliuli District of the Island of Maui (hereinafter referred to as the "Corporation"). The purposes of the Corporation are more particularly set forth in Exhibit "C". The Corporation shall be governed by a board of directors comprised of nine (9) persons, four (4) designated by the Hui, three (3) designated by Seibu, and the remaining two (2) to be mutually selected by Seibu and the Hui. In the event of a deadlock in the selection of mutually selected director(s) or any deadlock on the Board which shall give rise to statutory dissolution, the disputed item(s) shall be submitted to arbitration by the American Arbitration Association. Successor directors shall be chosen by the method described in this Paragraph. The Corporation shall be established and funded within sixty (60) days of the execution of this Agreement and 501(c) status will be applied for as soon as practicable.

5. Seibu agrees to dedicate certain lands in the Makena area to the Corporation for the development and operation

access and use, as shown on Exhibit "A" and in more detail on Exhibit "B" attached hereto and by this reference made a part hereof. Said lands shall be landscaped, designated for public use, and dedicated to the County of Maui. Access to such lands shall be by way of the walkway between the north and south cul-de-sacs.

In addition, Seibu agrees to provide a minimum of thirty and a maximum of fifty parking stalls for use by the public on T.M.K. 2-1-05:84 as close to the lands dedicated above as possible.

3. The parties hereto acknowledge that a publicly used mauka-makai access, the Ulupalakua-Makena Landing Road, has been closed. A portion of said Ulupalakua-Makena Landing Road traverses property owned by Seibu in Makena. The State of Hawaii plans to extend the Piilani Highway from Wailea to Ulupalakua as shown on the plans for the Piilani Highway in the offices of the Department of Transportation, State of Hawaii. To provide access between Ulupalakua and Makena Landing as soon as practicable, the parties agree to take all steps necessary to provide that the construction of the section of the proposed Piilani Highway extension from Ulupalakua to Makena Landing is given first priority. Seibu agrees that upon the reopening of that portion of the Ulupalakua-Makena Landing Road which traverses the lands owned by Ulupalakua Ranch, Inc. by the County of Maui and/or State for public access, Seibu will in like manner open and make available to public access that portion of the Ulupalakua-Makena

of a living cultural center to further the continued practice of native Hawaiian customs and traditions in the Makana area. Seibu agrees to dedicate by warranty deed an area of not less than three (3) acres, situated as shown on Exhibit "A" and in more detail on Exhibit "D" attached hereto and made a part hereof. In addition, Seibu agrees to provide for necessary utility hook-ups and will donate the amount of Four Hundred Seventy-Five Thousand and No/100 Dollars (\$475,000.00) as seed money for the Corporation.

6. At the election of the Hui, Seibu agrees to dedicate to the Hui for a living cultural center, in lieu of and in substitution for the lands described in Paragraph 5 hereof, a parcel of land not less than three (3) acres in size, situated in the area shown on Exhibit "E" upon the satisfaction of the following conditions:

a. Seibu elects and proceeds to relocate its 15th and 16th holes from the area makai of the Makana-Keoneoio Road to T.M.K. 2-105:83 and 85 (hereinafter collectively referred to as the "Poepoe Parcel");

b. An amendment to the Kihai-Makana Community Plan permitting the relocation of the 15th and 16th holes of the Makana Golf Course to the Poepoe Parcel and the redesignation of the area presently constituting the 15th and 16th holes from open space to hotel;

c. The obtaining of a state land use boundary reclassification designating the Poepoe Parcel for urban use and

a change of zoning in the area for the present 15th and 16th holes from golf course or open space zoning to hotel zoning; and

d. Seibu obtains a special management area permit for a hotel development makai of the Makana-Keoneoio Road in such area. To the extent feasible, the parties will cooperate to facilitate the concurrent granting of necessary permits and approvals; and

e. In the event the parcel described in Paragraph 5 has been placed into use by the Corporation, such parcel shall be left by the Corporation in reasonable condition.

7. If the Hui elects to waive its rights under Paragraph 6 hereof, the Hui may elect to exchange the lands dedicated to the Corporation under Paragraph 5 for lands situated in T.M.K. 2-1-06:22 and 30, presently held by the State of Hawaii. In the event the Hui so elects, Seibu and its attorneys

shall in good faith support such exchange, shall provide their full cooperation, and shall perform such reasonable acts of assistance to effectuate such exchange.

8. Seibu agrees to consult with the Board of Directors of the Corporation on a quarterly basis as to the planning of the future development and management of the Makana Resort and to work with the Board in the planning phases of the development to protect marine, coastal, cultural, historic, environmental and other resources.

9. The Hui claims that the predecessor in interest of the properties now owned by Seibu in the Makana area may not have

had complete title to all of the lands which it transferred to Seibu. Without admission by Seibu, the parties acknowledge that the possibility exists that there may be outstanding interests in the Seibu properties in Makana which exist in favor of persons other than Seibu. Accordingly, the parties agree that one of the projects of the Corporation will be to work with Seibu to locate persons who may have outstanding interest in lands presently held by Seibu and to allocate a portion of said lands owned by Seibu to these owners upon agreement by the parties or if necessary through a decision by a competent court determining an ownership interest.

10. Seibu acknowledges that certain members of the Hui, including Alice and Leslie Kulololo and Edward Chang, hold certain interests in two kuleanas, THK: 2-1-05:33 and 88, in the proximity of the Seibu properties. Seibu agrees to meet with the Kulololos and Edward Chang and to establish access over and across Seibu properties to these kuleanas. Seibu agrees to grant to the Kulololos and Chang a written right of entry providing for ingress and egress, for vehicles and necessary utility lines, from the nearest agreed upon public roadway to the Kulololos and Chang. Such right of entry may be moved from time to time upon further development of adjoining areas so long as it connects to the nearest agreed upon public roadway. In like manner, Seibu agrees to provide access over and across its properties to any other kuleanas or lands set aside pursuant to paragraph 9 hereinabove for other landowners in the Makana area.

11. In consideration of the foregoing undertakings and promises by Seibu, upon execution hereof, the Hui herein agrees to dismiss, with prejudice, against all defendants all of its claims contained in the lawsuits hereinabove described, being Civil Nos. 85-0053(1), 85-0187(1), 86-0237(1), 86-0364(1) and 87-0153(1), all filed and pending in the Circuit Court of the Second Circuit, State of Hawaii. Further, at such time the Hui and its members (excepting George Ferreira and other agreed to non-signing members) agree to terminate its participation in the Matter of the Application of Seibu Hawaii, Inc. for a Special Management Area Permit above-mentioned. Further, the parties hereto agree that in the event of any future conflicts or disagreements between the parties that they shall in good faith and with mutual respect for each other and the lands of Makana exhaust all efforts to resolve such conflicts and disagreements through the discussions and consultations to be entered into between the parties and the Board of Directors of the Corporation as described above.

Seibu agrees that it shall deposit within sixty days of execution hereof Four Hundred Seventy-Five Thousand and No/100 Dollars (\$475,000.00) in an interest bearing account with interest accruing to the Corporation with the First Interstate Bank, Mailuku-Branch, for the Corporation, which amount shall be held in deposit until 501(c) status has been obtained. During such time period, Seibu shall also pay to such entities or

persons designated by the Hui, Twenty-Five Thousand and No/100 Dollars (\$25,000.00) as and for attorneys' fees and costs.

12. From and after the execution of this Agreement, the Hui and its attorneys will not voluntarily provide to any person(s), organization, group, partnership, or any other entity that is not a party to this document or their agents or attorneys the attorney or litigation work product of the Hui, except that which may be mandated by court with appropriate jurisdiction or by the applicable rules of procedure.

13. Any pronoun used herein shall mean the masculine and the feminine, the singular or the plural, and individuals, corporations, partnerships or other entities, as the context shall require. This Settlement Agreement supersedes and cancels all prior negotiations, representations and agreements by and between the parties hereto, contains the entire agreement of the parties hereto with respect to the subject matter hereof, except as may be set forth in any separate instrument in writing executed by both parties, and no amendment or supplement to this Settlement Agreement shall be valid unless approved by both parties in writing.

14. The parties further understand and agree that this Settlement Agreement represents the compromise of a disputed claim, and that neither this Settlement Agreement nor the payment of any sum thereunder is to be construed as an admission of liability on the part of Saibu, by whom liability is expressly denied.

15. The parties hereto and their attorneys agree to execute all documents and in good faith to perform all acts, including the filing of motions and the provision of support, which may be required to promote and effectuate the purposes, terms and intent of this Agreement.

16. Should any dispute arise with respect to the terms or their performance of this Agreement, said dispute shall be submitted to mediation by The Honorable Elmer F. Cravalho. In the event such dispute cannot be resolved by mediation, it shall be returned to and resolved by The Honorable E. John McConnell, or should he be unavailable, to any judge of the Second Circuit, State of Hawaii, willing to hear the controversy for a binding, conclusive and final determination on such issue.

17. If a proceeding is commenced between the parties hereto in connection with the enforcement of any provision of this Agreement, the prevailing party in that action shall be entitled to recover its reasonable costs and expenses, including attorneys' fees.

18. This Agreement shall be subject to, governed by, and construed and enforced pursuant to the laws of the State of Hawaii.

19. This Agreement may be executed in any number of counterparts, each of which shall be deemed to be an original.

20. This Agreement shall be binding upon and shall inure to the benefit of each of the parties and their successors and assigns.

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

June 20, 1988

Ms. Dana Hall
2087 Wells Street
Wailuku, Maui, Hawaii 96793

Dear Ms. Hall:

Subject: Makana-Keoneolo Road Cul-de-sacs Plan Draft Supplemental
Environmental Impact Statement

We are in receipt of your comments dated May 8, 1988 on the Draft
Supplemental Environmental Impact Statement (DSEIS) prepared for the Makana-
Keoneolo Road Cul-de-sacs Plan.

As you have indicated in your initial paragraph, you have reached
agreement with Mr. Roy Figueiroa, Project Coordinator for Seibu Hawaii, Inc.
that certain language contained in the previously described Draft Supplemental
EIS would be deleted. These deletions have been accomplished in the requested
sections and we provide copies of these pages as enclosures.

Thank you for your comments and continuing interest.

Very truly yours,



F. J. Rodriguez

FJR:ls
Enclosure

limited to construction of the cul-de-sacs
roadway improvements and landscaping.
Hydrological impacts will be improved by the
grading plan which will help stabilize the
sand dunes and improve drainage. No rare
or endangered species of flora and fauna are
expected to be impacted by the action.

Archaeological and cultural-historic studies,
including subsurface investigations, have
been undertaken for the proposed action in
the makai road parcel. No evidence of any
significant archaeological resource has been
found in the area. If during any construction
work within the area, further evidence is found,
the normal practice of halting work and contact-
ing the State Historic Preservation Office of the
State Department of Land and Natural Resources
will be complied with.

Alternatives
Considered:

The proposed alternative will result in the
implementation of the subject action as pre-
viously described. The proposed alternative is
preferred to the previous land improvements
and alternatives described in the February 1987
EIS since it offers a comprehensive plan which
integrates the cul-de-sacs, parking, pedestrian
walkway, landscaping, and appurtenant improve-
ments to the existing Maul Prince complex, while
maintaining and enhancing the historical integrity
of the site.

The endemic Hawaiian bat might be found occasionally in the area. Introduced and common species of mammals found in the project area include the Roof rat or Black rat, Polynesian or Hawaiian rat, House mouse, and Small Indian Mongoose.

D. Archaeological and Historical Characteristics

The State Parks Administrator has indicated that the makai road parcel does not occur on historic properties that are listed on the Hawaii Register or the National Register of Historic Places, nor has it been deemed eligible for inclusion on the National Register of Historic Places.

The Hul Alanui O Makena has stated that the Makena-Keoneolo Road has evolved from the Pilihi Trail built in the sixteenth century and provides continuous access along the entire Makena coastline. The applicant has acknowledged this position and has subsequently submitted the proposed action which after review and discussion with the Hul Alanui O Makena, addresses its' concerns and needs.

1. Historical Characteristics

As stated in the EIS of February 1987, an examination of documents by the Bishop Museum did not provide any substantial evidence of prehistoric use of the Makena-Keoneolo Road in Makena, Maui. Specific references used in the search include various topographic maps, territorial survey maps, private land survey maps, aerial photographs, Land Court Awards, missionary and other early accounts, as well as various field notes and reports for previously conducted historical and archaeological research in this region of Maui.

References to the traditional Pilihi Highway do not include this portion of the island in the catalogue of specific sections

of the road, nor is there any reference to this portion when the road was constructed.

Searches were made of old maps to ascertain the historical usages of this portion of the road. The earliest reference to the next reference is an 1881 map showing an alignment, including this section, labeled "Kalepolepo Road." An 1885 map has this area labeled "road." A 1904 compilation of government maps shows a well-defined coastal alignment. The 1928 USGS map of the Makena quadrant shows a coastal alignment through this area. A 1950-51 USGS Aerial photo, Maui Series shows the coastal alignment is not well traveled. The 1954 USGS map for this same quadrant shows a coastal alignment but further inland. The 1983 USGS map shows the present alignment of the Makena Road. As indicated by these maps, there has been a defined road in this area since possibly 1845.

The information obtained so far, while not supporting prehistoric use of the Makena-Keoneolo Road in this area, does indicate substantial use in historic times. However, it appears that the alignment of this road, has undergone change throughout this period of time.

2. Archaeological Characteristics

The Bishop Museum has also indicated that no remains of a road or trail have been recorded in the project area. A field study conducted by the museum also produced no archaeological evidence of a Hawaiian trail on or beneath the makai road parcel (Appendix A, Makena-Keoneolo Road Cul-de-sacs Plan EIS, February 1987).

Additional work was conducted by the Bishop Museum in December of 1987 (Appendix A) at the south cul-de-sac and

VIII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY AND IRREVERSIBLE/IRRETRIEVABLE COMMITMENTS OF RESOURCES

The proposed project would remove the subject portion of the Makena-Keoneolo Road from existing vehicular use. This loss would not affect pedestrian access; however, it would terminate what is considered a portion of a continuous coastal access route.

It is anticipated that the construction of the proposed project will commit the necessary construction materials and human resources (in the form of planning, designing, engineering, construction labor, landscaping, and personnel for maintenance functions). No construction materials are likely to be reused. Labor expended for this development is not retrievable. However, labor will be compensated during the various stages of the project by the developer, commercial businesses, and the building's management.

The appearance of the project site will be altered from its arid, undeveloped appearance to that of an integrated landscaped, open space. The development will be highly visible as an open space integrated with the surrounding areas.

Air and noise quality will be improved by this proposed project. While ambient air and noise quality in the area is relatively good, the proposed development will eliminate vehicular access through the project area, resulting in no vehicular pollution and fugitive dust.

The project development will result in a commitment of land for a long-term period. Once open space use is established, it is unlikely that the land will be reverted to other development in the long-term future. Commitment of land for this purpose will likely foreclose certain future use options of the land.

X. SUMMARY OF UNRESOLVED ISSUES

The County of Maui Planning Commission has determined that the proposed Cul-de-sacs Plan represents a significant and substantive revision to the original scope of the Cul-de-sacs Plan described in the Final EIS of February 1987, and has therefore, required that the subject Supplemental Environmental Impact Statement be prepared.

At this time, there are no unresolved issues from the standpoint of potential physical impacts. A question of the cultural impact of the proposed action has been raised; however, no concurrence has been obtained on the actual value of the site in question. Alternatives to the proposed action were developed but were found to be less desirable than the subject project.

APPENDIX A

Archaeological Reconnaissance Survey of the
Makena Road South Cul-De-Sac Area and the
Old Makena School Site, Makena, Maluaka,
Makawao, Maui Island

TMK:2-1-05: 84 and por. 86

by
Applied Research Group
Bishop Museum

January 28, 1988

Ms. 012888

ARCHAEOLOGICAL RECONNAISSANCE SURVEY
OF THE MAKENA ROAD SOUTH CUL-DE-SAC AREA
AND THE OLD MAKENA SCHOOL SITE
MAKENA, MALUAKA, MAKAWAO, MAUI ISLAND
TMK:2-1-05: 84 and por.86

by

Paul L. Cleghorn
Carol Kawachi
Aki Sinoto

for

Seibu Hawaii, Inc.
5415 Makena Alanui
Kihei, Maui, Hawai'i 96753

January 28, 1988

Applied Research Group
Bishop Museum
Honolulu, Hawai'i

INTRODUCTION

Under contract, PA102887, to Seibu Hawaii, Inc., the Public Archaeology Section, Applied Research Group, Bishop Museum, conducted an archaeological reconnaissance survey of two areas designated for development in Makena, Maluaka ahupua'a, Makawao District, Maui Island. Fieldwork was performed on Monday, December 7, 1987 by Paul Cleghorn and Aki Sinoto. The literature search task and writeup was undertaken by Carol Kawachi both preceding and following the fieldwork.

Numerous archaeological surveys have been conducted in the Makena area (eg. Haun 1978a, 1978b; Cordy 1978a, 1978b; Dennison 1979a, 1979b, Dye 1979; Rogers-Jourdane 1979; Sinoto 1981; and Clark and Kelly 1985). These reports present environmental data, and synthesize previous archaeological work that have been undertaken. Rather than repeat this information here, the reader is referred to these reports for the general background information on the project area.

We appreciate the assistance of Mr. Roy Figueiroa of Seibu Hawai'i, Inc., during our fieldwork. We also extend our thanks to the following people for their time and assistance provided during the literature search: Mssrs. Charles Okino and Henry Fujita, Survey Division, State Department of Accounting and General Services; Mr. Roy Hirose, Maui District Office, Department of Education; Ms. Lynette Furukawa, Hawaiian and Pacific Collection, University of Hawaii Library; and Ms. Hokulani Holt-Padella, Maui Historical Society.

SCOPE OF WORK

The purpose of this survey was to determine the presence/absence and general nature of archaeological resources in the two areas, determine the preliminary significance of any remains located, and accordingly formulate recommendations for further work required prior to the commencement of development activities to mitigate any potential adverse effects.

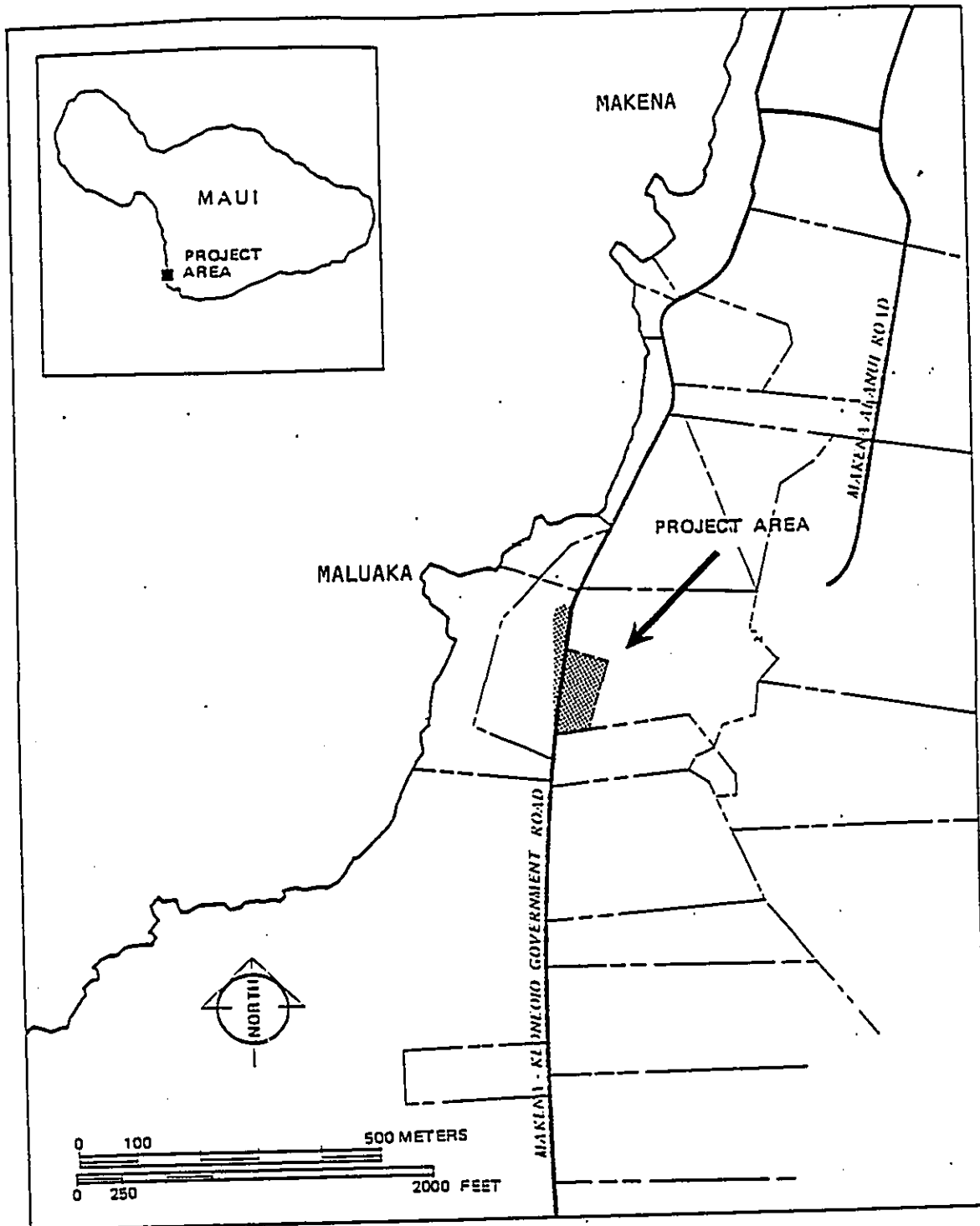


Fig. 1. PROJECT AREA.

The following work tasks as set forth in the contract were completed during the current project:

- 1) pre-field literature and documents search,
- 2) archaeological surface survey,
- 3) limited sub-surface survey, as warranted,
- 4) appropriate laboratory procedures, and
- 5) report writeup, review, editing, and production.

DEFINITION OF PROJECT AREA

The two specific study areas were:

- 1) A roughly two acre parcel situated along the eastern (mauka) edge of Makena Road, referred to as the "Makena School Site," which is slated to be partially developed into a public parking area; and
- 2) an approximately 800 square foot area along the western (makai) edge of and incorporating the existing road that will become the proposed Makena Road south cul-de-sac (Fig. 1 & 2).

FIELD METHODS

The entire areas of both survey parcels were traversed by foot. Surface coverage was complete except for a few dense stands of panini cactus (Opuntia megacantha) that hindered access. The other predominant vegetation consisted of koa haole (Leucaena glauca), kiawe (Prosopis pallida), and various shrubs and dry grasses. When archaeological features were encountered, measurements and descriptive notes were taken and the features were photographed on black and white film. In addition to the surface survey, eight stratigraphic shovel pits were excavated to determine the presence or absence of subsurface cultural deposits (Fig. 2). No artifacts or other samples were recovered. All original field notes, maps, and photographs are on file in the Anthropology Department, Bishop Museum.

SURVEY FINDINGS

The surface survey and two subsurface shovel pits yielded no

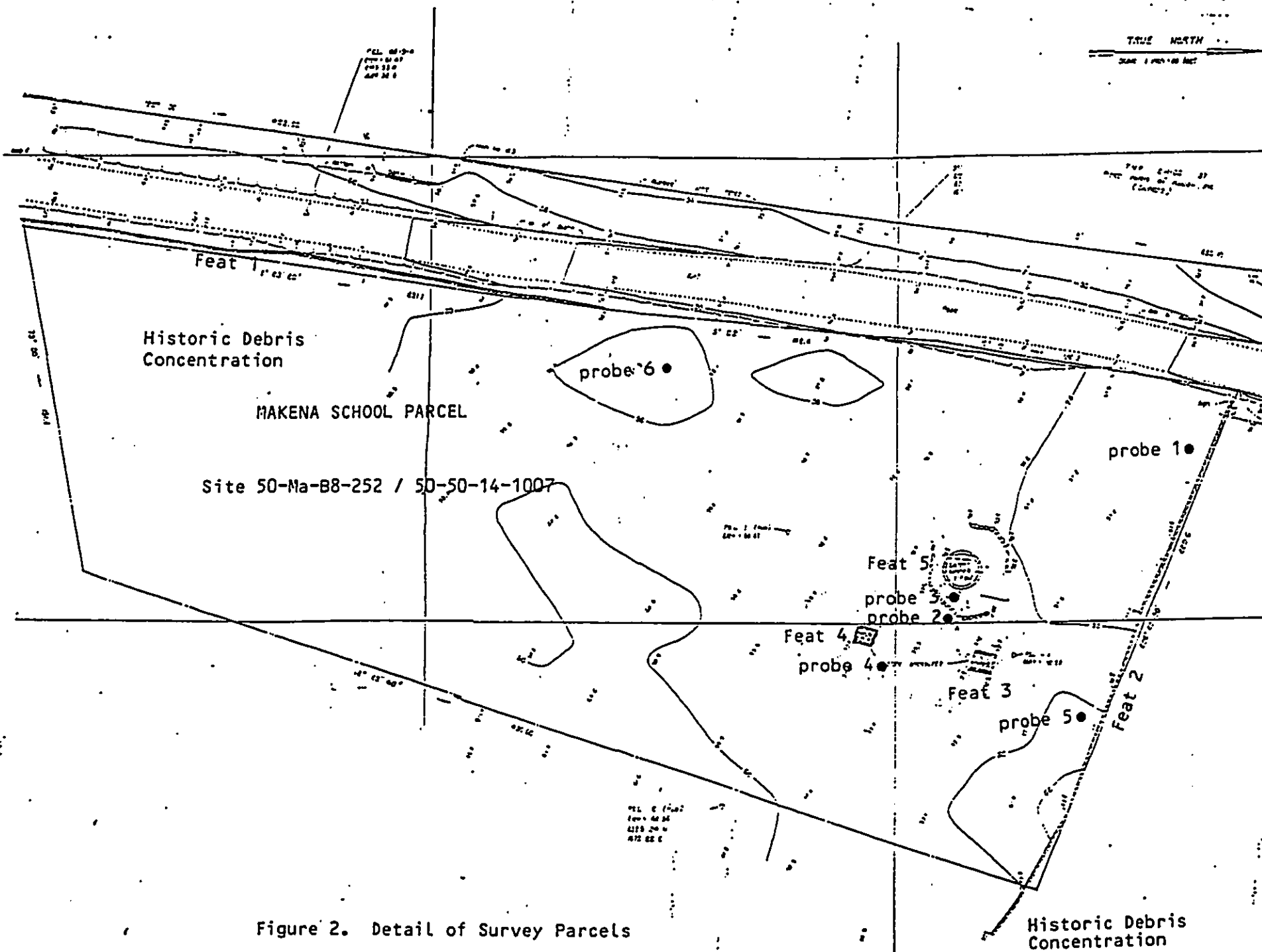


Figure 2. Detail of Survey Parcels

XEROX COPY

TRUE NORTH
SCALE 1 INCH = 80 FEET

TOP CORNER OF
WEST PART OF SECTION 20
(CANTON)

CELL 22-814
170' x 140'
1122 33' N
120-44' E

CUL-DE-SAC PARCEL

probe 1 ●

probe 7 ●

probe 8 ●

probe 5 ●

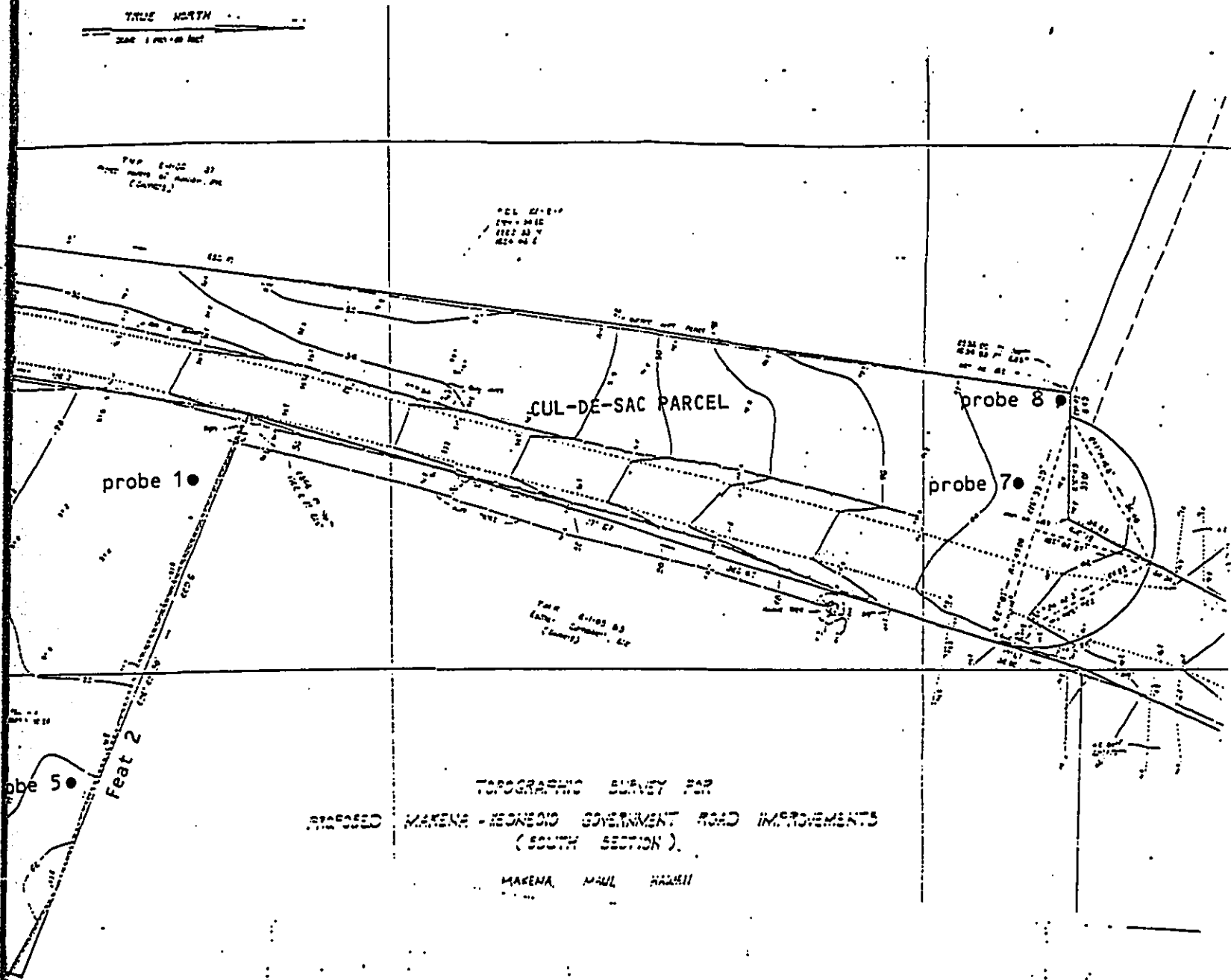
Feat 2

TOPOGRAPHIC SURVEY FOR

PROPOSED MAKENA - HONOLULU GOVERNMENT ROAD IMPROVEMENTS
(SOUTH SECTION).

MAKENA, MAUI, HAWAII

Historic Debris
Concentration



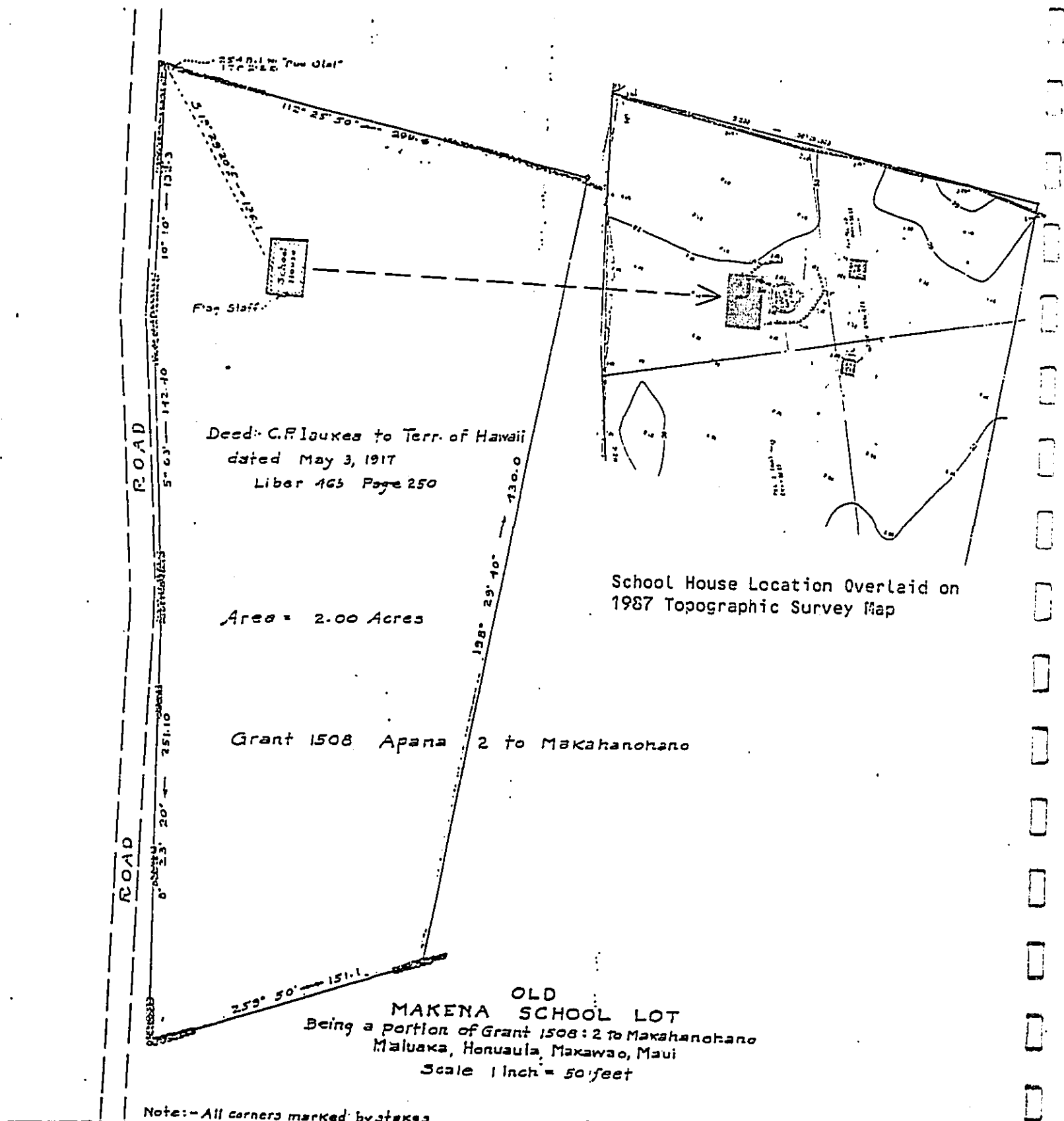
archaeological remains in the cul-de-sac parcel. In general, due to the close proximity to the existing road, this parcel exhibits compounded extensive disturbance. The six shovel pits excavated in the Makena School Site parcel yielded similar negative results. The stratigraphy was generally uniform and reflected natural deposition of beachdune sand overlying the reddish-yellow Makena loam. In the northern half of the parcel the sand layer ranges in thickness from 0.3 to 0.5 meter. This overlying beach sand dissipates towards the higher standing southern half of this parcel.

Five surface features were located and recorded in this parcel, two are walls that define the boundary of the parcel, and three are stone structures located centrally within the northern third of the parcel where the proposed parking lot will be constructed. The parcel has been named the Makena School Parcel Historic Complex and assigned Bishop Museum site number 50-Ma-B8-252 and State No. 50-50-14-1007 to the whole parcel with feature numbers assigned to the surface remains.

The five surface archaeological features are:

- 1) A crude stacked wall roughly 80 meters long, 0.8 meter wide, and 0.5 meter high parallels the Makena road and forms the western boundary of the southern half of the parcel. The utilization of waterworn stones suggests modern origins. Also extensive past disturbance is indicated. According to a Territorial Survey Map (CSF No. 2809), this wall was in existence in 1936 and extended along the entire length of the western boundary of the parcel (Fig. 3).

- 2) A core filled, double faced wall approximately 0.8 meter wide, and ranging from 0.4 to 1.0 meter in height defines the northern boundary of this parcel. The northern parcel boundary is roughly 76 meters, however, the wall continues eastward beyond the limits of the parcel. The more diagnostic construction of this wall contrasts markedly with that of the Feature 1 wall and suggests a traditional land boundary.



C. S. F. NO. 2309

SURVEY DEPARTMENT
TERRITORY OF HAWAII

T.C.R. 8/14/36

Figure 3. Map of Old School Lot with School House Location

6

3) A roughly square (3.0 by 2.7 meters) platform constructed of a single course of basalt boulders is 0.27 meter high along the western side and flush with the ground surface along the eastern side. A two by eight length of lumber is centrally incorporated into the structure, dividing it into east and west halves. The western half is boulder filled and the eastern half is a depression. Several square nails, 8 centimeters in length protrude from the lumber.

4) Another platform almost identical in construction with Feature 3 measures 3.3 by 3 meters. This structures also incorporates a depression and a length of lumber.

5) A large cement lined cistern, 4.5 meters in diameter and 3 meters deep is located west of the two platforms. Two irregular stone alignments appear to partially encircle the cistern. The Makena loam material resulting from the excavation of the cistern appear to be contained within the encircling alignment. At the top edge of the cistern are six slots that probably held a wooden cover.

In addition to the five features described above, two other concentrations of modern material were noted, one located just beyond the northeastern corner of the parcel and the other located within the southern third of the parcel.

HISTORICAL SUMMARY OF THE "OLD MAKENA SCHOOL"

The "Old Makena School" was located in the ahupua`a of Maluaka, inland of Malu`aka Point, in the Makawao (formerly Honuauia) District on the southwest coast of Maui. In 1840, all schools in Hawaii came under Government administration (Kuykendall 1947:347-348 in Barrere 1975:56). In June 1865, Abraham Fornander, as Inspector General of Schools, toured the Maui district schools (Barrere 1975:56-57). Keawakapu School was then on the premises of the Protestant Church, built with cobblestone walls, a pandanus leafed roof and an 'ili`ili floor. Although school was not in session, Fornander estimated approximately 40 pupils in attendance. The School Directory of 1897 (p.69, Table 14) listed

Keawakapu School Two years later, Makena School is listed with Keawakapu in parenthesis (p. 124, Table 14), probably to indicate that Keawakapu School was replaced by Makena School. But whether the "new" Makena School remained on the Protestant Church grounds is not known.

The parcel in which the "Old Makena School" was located was once part of the larger Grant 1508, bought by Makahanohano during the Great Mahele. A Hawaiian Government Survey map was done in 1885 and information was added in 1903 (Reg. No. 1268-A, Alexander, Dodge and Donn). On this map, a school is indicated in the area under present study. In January, 1917, Joel B. Cox surveyed the "Makena School Lot" and Curtis P. Iaukea conveyed it to the Territory of Hawaii by a deed dated May 3, 1917 (C.S.F. No. 2809). It is not known when the above Keawakapu/Makena School was moved to this location. When Handy was there in the 1930s, this Makena School had already been abandoned.

In summary then, a Makena School has existed at least since 1865 when it was on the Protestant Church grounds. It's name was changed from Keawakapu to Makena at the turn of the century. The present land parcel was deeded to the Territory of Hawaii in 1917. Makena school is on the USGS map of 1923. By the 1930s, this Makena School had been abandoned. No information regarding the cistern and the two platforms were found during the archival research.

DISCUSSION

All of the surface features located during this survey appear to date to the historic to modern periods, except for the Feature 2 wall which may have prehistoric origins. In addition, the eight shovel pits did not reveal any subsurface cultural deposits.

The Territorial Survey Map (CSF No. 2809) shows the school building within the subject parcel (Fig. 3). However, Features 3, 4, and 5 are not shown on this or any other map located during the archival research. In overlaying two maps (C.S.F. No. 2809 and the

1987 topographic map provided by the client) the school building overlaps portions of the Feature 5 cistern (Fig. 3). These data suggest that the cistern was most likely not associated with the school and probably post-dates the abandonment of the school.

The interpretation of Features 3 and 4 is more difficult. The formal arrangement of these similar structures incorporating depressions, lumber, and low foundations, suggest possible function as toilets. The presence of two such structures support the possibility that these may indeed be associated with the school as boys' and girls' toilets, however, further work is required to substantiate this interpretation. Table 1 presents a summary of descriptive data and the recommended mitigation procedures for individual features and the Federal significance criteria. Site 1007 is evaluated as significant under Criterion D.

RECOMMENDATIONS

No further work is recommended for the cul-de-sac parcel. Although in sand dune environments, the potential for unmarked burials is high, the sand in this particular area is shallow. Thus, although no monitoring is recommended during ground altering activities, should any cultural remains be encountered, activities should be temporarily halted in the vicinity until a qualified archaeologist can be retained to implement proper mitigation procedures.

The following recommendations are presented for the Makena School parcel:

- Feature 1) No further work is recommended for this western boundary wall remnant.
- Feature 2) This wall should be preserved in situ and used as the north boundary wall for the parking lot. No further work is necessary, if in situ preservation is implemented.
- Feature 3) This platform will be destroyed by the parking lot if the current design configuration is retained. If destruction is imminent, intensive data recovery

Table 1

SUMMARY OF FEATURES IN THE MAKENA SCHOOL PARCEL HISTORIC COMPLEX
 BISHOP MUSEUM SITE 50-Ma-B8-252
 STATE SITE 50-50-14-1007

Feat. No.	Description/Function	Condition	Horizontal Extent	Estimated Age	Deposit Est. Depth	Affected by Prop. Devpt.	Recommendation/Mitigation
1	Stacked wall/boundary	Poor	c. 80m	Hist/Modern	N/-	Yes	--
2	Core-filled wall boundary	Good	76m+	Prehist/Hist	N/-	No	Preserve
3	Platform/Foundation for toilet	Fair	8.1 sq m	Hist/Modern	Y/ 0.30m	Yes	Intensive Data Recovery
4	Platform/Foundation for toilet	Fair	9.9 sq m	Hist/Modern	Y/ 0.30m	No	Preserve
5	Circular Cemented pit/Cistern	Good	100 sq m	Hist/Modern	N/-	Partially	Partial Preservation

National Register Significance Assessment Criteria:

Criterion A specifies association with events or broad patterns important in the history of an area (e.g., Contact, the development of the state system of government, the expansion of agriculture into upland areas).

Criterion B reflects association with persons important in the history of an area (e.g., Queen Lili'uokalani).

Criterion C applies to sites that reflect architectural achievements (e.g., extensive terracing, certain roads and historic-period buildings).

Criterion D specifies that the site has yielded or has the potential to yield information significant for our understanding of traditional culture, history, prehistory, and/or foreign influences on traditional culture and history.

to determine function is recommended.

Feature 4) The second platform will be unaffected by the parking lot and thus should be preserved in situ. No further work is necessary, if in situ preservation is implemented.

Feature 5) The cistern proper will not be directly affected by the current configuration which will impact the surrounding alignment on the northern side of the cistern. No further work is necessary. For safety considerations however, it should either be covered or filled.

In general, three of the features will be affected, but further work is recommended only for two features. Oral informant interviews are recommended prior to any further fieldwork since relevant data (chronology and function) obtained from knowledgeable individuals may obviate the necessity for further fieldwork.

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MAPS

STATE SURVEY OFFICE

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1202 : Torbert's Map, Ulupalakua
1337 : Makena Bay (Jackson)
1763 : Honuaula, Maui

C.S.F. no. 2809 : Old Makena School Lot

UNITED STATES DEPT. OF THE INTERIOR

1923, Topographic Series 0707
1924

APPENDIX B

Bishop Museum Letter
February 19, 1988

Re: Summary of Archaeological Sensitivity in the Proposed
Beach Access No. 3 Area



B I S H O P M U S E U M

1525 BERNICE STREET • P.O. BOX 19000A • HONOLULU, HAWAII • 96817 0916 • (808) 847-3511

February 19, 1988

Mr. Fred J. Rodriguez, President
Environmental Communications, Inc.
1146 Fort Street Mall, Suite 200
P.O. Box 536
Honolulu, Hawai'i 96809

Dear Fred:

Subject: *Summary of Archaeological Sensitivity in the Proposed
Beach Access No. 3 Area*

Pursuant to Seibu's request of February 9, 1988, a review of previous work was undertaken. This letter presents a summary of still extant remains in the vicinity of the proposed development.

The results of our review indicate that of the three specific sites included in my letter of January 28, 1988, only one, B8-237 (Cordy, Ms.113078), is within the proposed project boundaries. Mitigation activities have taken place in the other sites. More specifically, since B8-237 is a complex, only two features, 237-1 and 2, appear to be within the boundary of the No. 3 Beach Access. (see attachment)

Since the proposed development does not call for removal of the existing cement slab at 237-1, the underlying cultural deposit, 237-2 will not be affected. Thus no further work is recommended directly within the project area. In the event that clearing and landscaping work exposes any subsurface features, a qualified archaeologist should be contacted to make a determination of any necessary mitigation procedures in coordination with the appropriate County and State agencies.

For the other shoreside remains in the vicinity, care should be taken during any construction related activities for Beach Access No. 3, especially if any heavy equipment is involved, to stay within the project area boundaries to avoid affecting the nearby features.

Currently, there is moderate pedestrian traffic in the area from golfers, fishermen, and beach-goers with minimal observable adverse effects to these remains. The effect of increased traffic will have to be monitored following completion of the Beach Access. At that time, if warranted, appropriate mitigative procedures, such as fencing or data recovery should be implemented.

If you have any further questions or comments, please contact either Dr. Paul Cleghorn or myself at 848-4110.

Sincerely,



Aki Sinoto
Public Archaeology Contract Manager
Applied Research Group

attachment

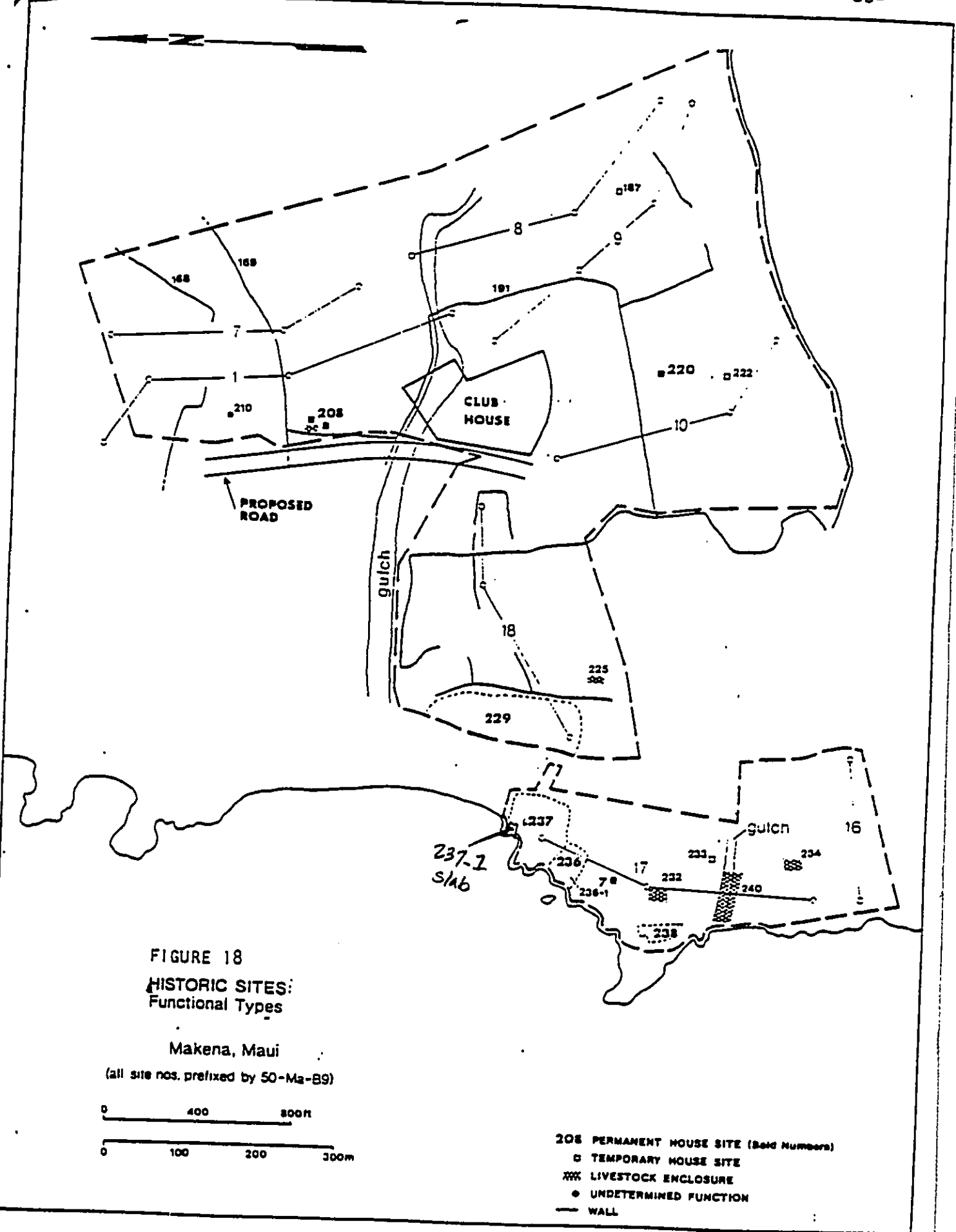
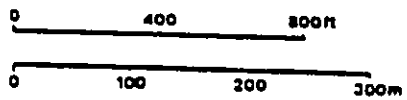


FIGURE 18
 HISTORIC SITES:
 Functional Types

Makena, Maui

(all site nos. prefixed by 50-Ma-89)



- 208** PERMANENT HOUSE SITE (Bold Numbers)
- TEMPORARY HOUSE SITE
- ▨ LIVESTOCK ENCLOSURE
- UNDETERMINED FUNCTION
- WALL

from Cordy