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**FINAL
ENVIRONMENTAL IMPACT STATEMENT**

VOLUME V OF V

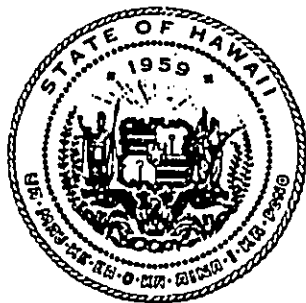
**KAHULUI AIRPORT IMPROVEMENTS
KAHULUI, MAUI, HAWAII**

State Project No. AM1011-07

U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

and

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION



GOVERNOR, BENJAMIN CAYETANO

September 1997

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**
As lead Federal Agency pursuant to the National Environmental Policy Act of 1969

STATE OF HAWAII, DEPARTMENT OF TRANSPORTATION
As lead State Agency pursuant to the Hawaii Revised Statutes, Chapter 343

FINAL ENVIRONMENTAL IMPACT STATEMENT

**KAHULUI AIRPORT
PROPOSED AIRPORT MASTER PLAN IMPROVEMENTS
KAHULUI, MAUI, HAWAII**

This Environmental Impact Statement (EIS) addresses the potential environmental impacts of the proposed airport master plan improvements including: extending and strengthening Runway 2-20; construction of a parallel Runway 2R-20L; land acquisition; new airport access roadway; commercial and general aviation facilities such as aircraft parking aprons, taxiways, navigational aids, etc.; jet blast protection; and an interim helicopter facility. The EIS also addresses the required information necessary for the State of Hawaii to obtain federal assistance for the development of surface access around the airport from the U.S. Federal Highway Administration, through the Intermodal Surface Transportation Efficiency Act (ISTEA). The EIS is submitted for review pursuant to the following public law requirements: Section 102(2)(c) of the National Environmental Policy Act of 1969; Hawaii Revised Statutes, Chapter 343; and 49 USC 47106.(c)(B) and (C) of the Airport and Airway Improvement Act of 1982, as amended.

VOLUME V of V: APPENDIX V (continued)

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**ENVIRONMENTAL IMPACT STATEMENT
KAHULUI AIRPORT IMPROVEMENTS**

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U N I V E R S I T Y O F C A L I F O R N I A



REGULARLY CAYETANO
GOVERNOR



KAJUHAYASHIDA
DIRECTOR
IN CHARGE
CLEMILU OKIMOTO
Brian K. Minsal

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

WRIFY REFER TO
AIR-EN
97.1000

August 20, 1997

2441 Lilikoai Road
Haiku, Maui, Hawaii 96708
(808) 572-1804

18 May 96

David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

RE: TESTIMONY: KAHULUI AIRPORT EXPANSION (Amended from 5/8/96)

Dear sir:
As a long term resident of Maui and small farm owners, we support the "no Action" alternative regarding runway lengthening and a parallel runway. Although we have not read in depth the six volumed DEIS on the Kahului Airport, we nevertheless feel compelled to respond. The fact that the draft never addresses the internationalization issue nor the consequences of introducing alien species leads us to request another study which specifically treats these concerns. We here do not need a larger airport with international flights. Alien species and introduced pests already threaten us. Furthermore, traffic and overdevelopment even now threaten tourism. More fuel shipment and storage could jeopardize our shorelines. The hospital facilities are woefully inadequate to handle any jumbo jet crash. Increased urbanization is an obvious result of runway lengthening, tied inextricably to internationalization. An urban Maui will generate more crime, encourage more land speculation, and sooner or later destroy the very Maui that continues to charm residents and visitors alike. All the negative impacts have been made clear many times before. We are looking to a local sustainable economy, which in no way necessitates a bigger airport. Let's recognize our great good fortune of having the chance to preserve a quality of life that all the world may envy. Let's preserve Maui's rural life style. Please.

Sincerely,
Diana Dahl
Diana Dahl, Bd of Directors - Hawaii Organic Farmers Association (HOFA)
member - Maui County Farm Bureau (MCFB),
- Hawaii Tropical Fruit Growers (HTFG),
- Native Plant Society, Maui Tomorrow,
owner - Melody Farm
for
Chuck Boerner, owner - Ono Organic Farms, Inc.
Ed of Directors - HOFA,
President - MCFB
Erik Frye, member - HOFA,
President - Hawaii Tropical Fruit Growers, Maui Chapter
partner - Ola Pono Health Farm
Chris Gebb, Ho'ola'wa Community Association,
small farm owner
Lee Lopez, owner - Ola Pono Health Farm,
member - HOFA, HTFG, MCFB
Roy Smith, manager - Melody Farm,
member - HOFA & HTFG
Richard Sylva, owner - Pulehunui Organic Farm
member - HOFA
land steward - Haleakala Ranch
Steve Wilson, owner - Haleakala Organic Produce,
Board of Directors - HOFA

RECEIVED
MAY 22 1996
TOWARD K. HOFA & ASSOCIATES

cc: Owen Miyamoto, Governor Ben Cayetano, and Brian Ishii

Ms. Diana Dahl
Board of Directors
Hawaii Organic Farmers Association
2441 Lilikoai Road
Haiku, Hawaii 96708

Dear Ms. Dahl:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 18, 1996, on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DD-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

See Comment DD-2
See Comment DD-1
BD-1 and DD-1
See Comment DD-1

to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT DD-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to adversely be affected by the proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the

FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DD-3 - Effect of Proposed Project on Shorelines

The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will have insignificant effects on the marine environment offshore of the Kahului Airport.

COMMENT DD-4 - Growth Inducing Impacts of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport After Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ms. Diana Dahl
Page 6
August 20, 1997

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Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Dear Sirs:

I am writing as a concerned citizen and caring steward of this aina that we occupy on the island of Maui. I have lived here since 1981. In that short time period, I have witnessed the deterioration in the quality of life that expansion and development have brought to this island — the increase of crime, stress, noise and air pollution; the economic stress created by short-term gain real-estate-development-based economies.

In 1983-1984 I worked a brief time with a man named Jim Jordan, owner/operator of a native plant nursery called Maluhia Farms. Mr. Jordan is responsible for creating a native Hawaiian re-introduction garden along the shoreline at Wailea Point, as well as other private projects. He has since closed his nursery and moved to the mainland — his business struggling to promote the cultivation and conservation of native plant species against many odds, some economic, but more to the point, some environmental.

It was very clear to me then by observation, and is now common knowledge, that native species plants are more likely to be attacked by alien species insects than are exotic species plants. They do not have the defense mechanisms within their structures, nor in their environments (helper insects) to survive these attacks.

Mr. Jordan was forced to see pests used to control this problem. With the goal in mind of improving by preserving the native natural environment, poisons are obviously counter-productive.

With the current expansion plan of the Kahului Airport breathing down our necks, I feel an urgency to speak out and take action!

The current Environmental Impact Statement does not adequately address the most serious issue: the risk of introducing non-native species. This is unacceptable. Non-native species such as ants and others can easily travel directly to our precious natural "tourist attractions" such as IAO Valley and Haleakala State Park via bus baggage compartments, trunks of cars etc.

For the volume of tourist/visitors we currently have arriving in Maui, our inspection and quarantine facilities are a joke. Add to that international flights coming from many biodiverse areas and what you have is a disaster. We have an insect-friendly environment here on Maui — from the ocean up to Haleakala (a mere 15 miles from the airport). We do not have the kind of climate changes that keep species under control in other locations. This Garden "what we who live here love so much is very vulnerable for this reason.

see Comment BDA-1

see Comment BDA-2

Ms. Darci D'Anna
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Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien

Ms. Darci D'Anna
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August 20, 1997

AIR-EN
97.1002

species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DDA-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

JUN 10 1996

BENJAMIN J. CAYEIANO
GOVERNOR



KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
CELESTIAL OKAMOTO
BRYAN K. MINAMI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

WHERE REFER TO
AIR-EN
97-1232

August 20, 1997

June 7, 1996

David Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850-0001

Attention David Welhouse,

Dear Sir:

Please enter my approval for the longer runway at the Kahului
Airport.

YES YES YES YES

Sincerely,

James L. Davenport
James L. Davenport
3120 Waakea Place
Wailea Hawaii 96753
808-874-8088

Mr. James L. Davenport
3120 Waakea Place
Wailea, Hawaii 96753

Dear Mr. Davenport:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your support in your letter of June 7, 1997 for the
proposed Kahului Airport Improvements. Your comments will be
made available to the decision makers prior to a final decision
on the Proposed Project.

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

c: Federal Aviation Administration (D. Welhouse)

the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including

information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT BDB-2 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of HDOT and the FAA.

MAUI 1 3 1006

RENUANUJ CAVETHAO
DIRECTOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAUAI HAWAII
DIRECTOR
DEPT. DIRECTOR
CLEMENS OMAHOYO
Brian K. Mizal

WAIKAI REFER TO
AIR-EN
97-899

August 20, 1997

May 9, 1006
Comment D-1

REGARDING MAUI AIRPORT EXPANSION:

I am concerned because the EIS for the Maui Airport does not address the question of introduction of alien species. While our airports are not the only source of introductions, they clearly are a point where we should be carefully monitoring the introduction of non-natives. Maui in particular offers a wide spectrum of habitats to the invaders, and also is the site of severely threatened indigenous plants and animals. The airport expansion should be linked to strong procedures to inspect and, where necessary, seize or quarantine.

David J. Wellhouse
Federal Aviation Office
Box 50244
Honolulu HI 96850
Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd. #700
Honolulu, HI 96819

Dorothy Deimel
45-020 Malulani St.
Kaneohe HI 96744

Ms. Dorothy Deimel
45-020 Malulani Street
Kaneohe, Hawaii 96744

Dear Ms. Deimel:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 8, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DD-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

Ms. Dorothy Deimel
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August 20, 1997

was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DD-2 - Inspection and Quarantine Procedures

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Ms. Dorothy Deimel
Page 2

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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information

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DEPARTMENT OF TRANSPORTATION
AIR-EN
97.1029



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

DEPARTMENT OF TRANSPORTATION

Dear Committee/ Board Members:

In reviewing the DEIS for the proposed Kahului Airport Expansion it is very clear that in spite of its vast volume this is a seriously flawed document. The report concludes that the lengthening of runway 20-2 to a span which can accommodate larger international aircraft will have insignificant impact on Maui's social and environmental well being. The DEIS also asserts that any impacts which might result, especially those having to do with Maui's greater exposure to escaped alien species, are insignificant or would occur anyway. Common sense and actual past experience tell us otherwise.

The report dismisses Haleakala National Park (15 miles away), one of the world's premier ecological resources, as too far away to be affected by any changes in the airport's size or use. If Park biological research personnel would have been allowed to consult on the DEIS, (as they requested) its authors would have been given a very clear understanding of how many invasive species have found their way into the park from a 15-20 mile range and beyond.

Local ornithologists observe that expansion of the runway and the addition of a parallel runway could have a negative impact on the protected birdlife of neighboring Kanaha Pond Wildlife Sanctuary. The DEIS does not address this. Several public schools and other facilities are already adversely affected by noise generated by current Kahului flights. The DEIS does not see a need to address the impact expanded airport use might have on these facilities. Local agriculture and native flora and fauna are very susceptible to alien organisms especially from Asia and the Pacific Rim. Yet the DEIS does not specifically weigh the impacts of airport internationalization on the introduction of alien species into Maui's environment. It naively assumes some vaguely promised plan will take care of the problem.

It is quite apparent to any realist that the expansion proposed for Kahului Airport over the next 14 years is entirely premature. Until the State can put an efficient monitoring system in place to detect and intercept alien organisms, animals, plants and diseases at the Honolulu International Airport and demonstrate its effectiveness over the span of years, there should be no further discussion of expanding Kahului Airport.

We urge the Department of Transportation to reject this DEIS. We recommend that further efforts to address the true impacts this project would have on the whole island of Maui (not just the few square miles surrounding the immediate airport) include input from the qualified staff of Haleakala National Park and the National Biological Service. We further propose that the "no build" alternative so blithely dismissed in the current DEIS be actually researched and presented as a viable option.

Sincerely,
Lucienne de Naie
Lucienne de Naie, Conservation Committee
Sierra Club, Maui Group
P.O. Box 2000, Kahului, HI 96732

Ms. Lucienne de Naie
Conservation Committee
Sierra Club, Maui Group
P. O. Box 2000
Kahului, Hawaii 96732

Dear Ms. de Naie:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT LBN-1 - Social and Environmental Effects of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an

See Comment LBN-3 and LBN-2

See Comment LBN-3 and LBN-4

See Comment LBN-5, LBN-6, LBN-7, and LBN-8

See Comment LBN-9

See Comment LBN-10

are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this Project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this Project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the Hawaii Department of Transportation's (HDOT) "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT LDN-2 - Introduction of Alien species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP

Increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there

Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the

Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT LDN-3 - Effect of Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other state agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

COMMENT LDN-7 - Potential Effects of Proposed Project on Public Facilities

The potential effects of the Proposed Project on Public Facilities, Infrastructures and Service, and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated in the Draft EIS, in general, the Proposed Project will have a beneficial effect on infrastructure components such as the road way system in and around the airport or not have an appreciable effect on infrastructure components, such as the electrical power generation, wastewater collection, treatment and disposal system, or potable water system of the island. As indicated in Section 2 of the Draft EIS, the Proposed Project is in response to existing and forecast increase in aircraft operations and passenger levels. These increases will occur regardless of the Proposed Project.

COMMENT LDN-8 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in section 8.2.1. International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis. Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

COMMENT LDN-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOF, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process.

The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOF, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead+ agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT LDN-5 - Effects of Proposed Project on Kanaha Pond Wildlife Sanctuary

The potential effects of the Proposed Project on Kanaha Pond Wildlife Sanctuary are discussed in Sections 3.11.2.2 and 3.12 of the Draft EIS. As indicated in the Draft EIS, the Proposed Project will not adversely affect the Pond or the Wildlife Inhabiting or frequenting the Pond.

COMMENT LDN-6 - Potential Noise Effects of Proposed Project

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS. As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the

Ms. Lucienne de Maie
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If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Ms. Lucienne de Maie
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August 20, 1997

to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the DOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT IDN-9 - Alternatives

Various alternatives to the Proposed Project, including alternative airport sites, are discussed in Section 4 of the Draft EIS. As indicated in the Draft EIS, the present airport site has been in use as an airport for several decades. The development of another airport at another site would be prohibitive and relocate potential noise, traffic and other effects to another area of the island.

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs are discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

May 20, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, the National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,



c: DOT - Airports Division
c: DOH - Office of Environmental Q.C.

AIR-EN
96.497

Ms. Misha Dieguez
Mailing Address Unknown

Dear Ms. Dieguez:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MD-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate

its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT MD-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the Hawaii Department of Transportation (HDOT) is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the

Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be

included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT MD-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process.

The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT MD-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extensions, increase the population, number of jobs, economic

activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses

Ms. Misha Dieguez
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the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT MD-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and aviation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Ms. Misha Dieguez
Page 6

to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT MD-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT MD-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the Proposed Project. The Proposed Project, when compared to

has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

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Ms. Val Dieguez
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Implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

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Ms. Val Dieguez
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of the Proposed Project. The Proposed Project, when compared to the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

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In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and avigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

MAY 21 1996

REPUBLIC OF HAWAII
GOVERNMENT



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
858 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAZU HAYASHIDA
DIRECTOR
GURUPAN OKAMOTO
Brian K. Minali

WIRELESS
AIR-EN
97-958

Herbert P. Dixon
Jo Ann Dixon
The Mahana #819
110 Kaanapali Shores Place
Lahaina, Maui, HI 96761
(808) 667-6161

May 21, 1996

REF: Extension of the runway at
Maui Kahului Airport

Mr. David Welhouse
FAA Administration
Airports District Office
Box 50244
Honolulu, HI 96850-0001

Dear Mr. Welhouse,

My wife and I are six year residents of Maui and have owned property here since 1978. We fly frequently to the mainland and are concerned about the safety and modernization of the airport facilities in Maui.

It has been our experience that each aircraft landing takes the full length of the runway, including a strong braking of the aircraft because of the short runway. When we are flying to Chicago or the East coast it is also very inconvenient to have to fly into Honolulu because the large wide bodied jets cannot take off with a full load of fuel.

Our recommendation would be to build two parallel runways of approximately 1500 feet each to serve the current and future needs of Maui.

I'm sure you are aware of the small, but very vocal minority which are trying to stop all progress here, but every survey and local elections have proved that the majority of people in Maui favor extension of the current runway and, we're sure would favor an additional runway also.

Thank you for the opportunity for comment.

Sincerely,

Herbert P. Dixon
Jo Ann Dixon
Mr. & Mrs. HERBERT P. DIXON

August 20, 1997

Mr. and Mrs. Herbert P. Dixon
The Mahana No. 819
110 Kaanapali Shores Place
Lahaina, Hawaii 96761

Dear Mr. and Mrs. Dixon:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 21, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT HPD-1 - Use of Existing Runway

You are correct in stating arriving overseas aircraft utilize the entire length of the existing runway when landing. These aircraft are also unable to takeoff from the existing runway when fully loaded due to the short length of the runway.

Consequently, for the airport to operate more efficiently and allow fully loaded overseas aircraft to take off and land safely and efficiently, the Proposed Project includes extending and strengthening the existing Runway 2-20 to approximately 9,600 feet. A parallel runway is also planned to accommodate future aviation demand. However, this runway will only be constructed when demand indicates it is required.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

See Comment HPD-1

KLAHANI RESORTS CORPORATION
505 FRONT STREET #129
LAHAINA, HAWAII 96761
1-800-669-MAUI
1-808-667-2712

4/22/96

Mr. David Welhouse
US Department of Transportation
Federal Aviation Administration
Honolulu Airport District Office
Honolulu, HI, 96850

Dear David,

I am writing to you in favor of the runway strengthening and extension of Runway 2-20 and related improvements at Kahului Airport.

Although we agree with the study that Airport improvements, do not, in and of themselves create more visitors or a boom for tourism, we do feel that these improvements will greatly benefit all but a very small minority of the residents of our beautiful island.

Our company is involved in a variety of aspects in regards to the visitor industry. We are licensed Real Estate Brokers, Condo-hotel operators, we market activities and inter-island trips and are a full service travel agency.

Tourism is the primary industry on Maui with 53% of Maui county workers holding jobs in the visitor industry. Unemployment is growing on Maui above the state wide average. We are missing out when we cannot safely accommodate the landing and take-off of direct flights, to and from our island paradise.


Many of our visitors are repeat guests coming back to Maui year after year. As condo-hotel operators, we love them but they do very little to boost the economy or support our primary industry. They consider themselves part-time residents, demand Kaamaina discounts, eat out

only occasionally and do not go to luau's, book helicopter tours or ocean and other related activities.

On the other hand, as Travel Agents, we talk to first time visitors to Hawaii and tour operators who often pass us by because of the lack of direct flights. They may only be on our Islands for 3 or 4 days but they spend money. So often they are reluctant to spend part of their first day traveling inter-island and part of their last day returning to Honolulu.

In conclusion, we do not believe that a safe and improved airport will create a Waikiki on Maui. Nor is this the desire of most. We do believe, however, that since Tourism is our primary industry accounting for over 50% of our gross county product, we should have the proper facilities so that we can attract the best possible visitors—i.e. visitors who spend money and keep our industry healthy and people employed.

Sincerely,
Klahani Resorts Corporation


Jerry Downer
President

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTOR
CLEVINU OKIMOTO
Brian K. Minsat

WIRE/TELETYPE TO
AIR-EN
97-934

August 20, 1997

Mr. Jerry Downer
Kiahani Resorts Corporation
505 Front Street, No. 129
Lahaina, Hawaii 96761

Dear Mr. Downer:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comments on the Draft EIS for the proposed Kahului Airport Improvements. Your support in your letter of April 22, 1996 is appreciated. The purpose of the Proposed Project is stated in Section 2.3 of the Draft EIS. Your comments and this response will be appended to the Final EIS for review by the decision makers.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Handwritten text, possibly a signature or name, oriented vertically on the left side of the page.



May 3, 1996

Dear Mr. David J. Wellhouse:

We are writing in regards to the plans to expand Maui's Kahului Airport. While an Environmental Impact Statement (EIS) was conducted, we believe the EIS does not adequately address the issue of introducing non-native species to Maui, Hawaii. The EIS fails to establish inspection and quarantine procedures for the airport. Further, the National Park Services was excluded from discussions amongst the Federal Aviation Administration and the Hawaii Department of Transportation. The National Park Services strives to ensure that our land and resources at Haleakala are protected and should be included in any discussions.

PLEASE, protect Hawaii's beauty and environment. We need to preserve what little there is left, for the sake of our children and future generations.

Thank you for your time.

Sincerely,
Luisa Edralin
Lynette Y. Yamada
J. Peter Ellison
Yolanda Akana
Chana Medin
Seane Lopez
Sherry H. Garcia
Marky Zottin

cc: Owen Miyamoto
Department of Transportation, airports

Ms. Luisa Edralin, et al
Mailing Address Unknown

Dear Ms. Edralin:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 3, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT LB-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and

See Comment LB-1
in EIS and EIS-1

designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its

regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT LE-2 - Inspection and Quarantine Facilities

Inspection and quarantine procedures at Kahului Airport are discussed in Section 3.11.3.4 of the Draft EIS. As indicated, the HDOT, Airports Division, is committed to continuing to work with the Hawaii Department of Agriculture (HDOA) and the U.S. Department of Agriculture (USDA) to deter the introduction of alien species through the State airport system. Additionally, HDORA is committed to incorporating into the new air cargo building to be constructed at Kahului Airport the facilities and equipment recommended by HDOA and USDA that are necessary to deter the introduction of alien species into Maui. This action is one of the mitigation measures developed during the preparation of the Alien Species Biological Assessment as noted in the response to Comment LE-1, above.

COMMENT LE-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien

Ms. Luisa Edralin, et al
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species issue. The NPS is a member of the Biological Assessment
Technical Panel and has provided scientific reference materials
as well as direct experience in the area of alien species impacts
and control.

has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT BE-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the

biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT SE-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOF, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOF, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT SE-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic and Economic Impacts); and Section 6.0 (Induced Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an

increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

Implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the STAR, in addition to evaluating the "most probable" growth inducing impacts of the proposed project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the STAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the STAR's initial conclusion that the proposed project would have little or no impact on growth. The STAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the proposed project and international flight operations, please consult the STAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The STAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT BR-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT BR-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result

of the proposed project. The proposed project, when compared to the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the proposed project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT BR-7 - Noise

The noise impacts of the proposed project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and aviation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

CORRECTION

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

Implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

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For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

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U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

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The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will not directly impact the marine environment and there will be insignificant or no effects on water quality or runoff.

COMMENT ME-2 - Increase in Traffic Problems

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project will have positive impacts on several of the existing intersections within the Airport Area. However, other existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

COMMENT ME-3 - Increased Pollution

The potential effects of the Proposed Project on the air quality of the project area are discussed in Section 3.7 of the Draft EIS. Both air quality factors with aircraft and surface transportation (vehicles) are discussed. The fundamental test regarding the Proposed Project's potential air quality impacts is whether the present airport facility, together with the Proposed Project improvements will meet national and state ambient air quality standards. Exceedences of these standards would constitute a significant environmental impact. Emissions that do not exceed the standards would be insignificant. Based on the analyses performed for the Draft EIS, short-term emissions during construction are not expected to exceed air quality standards and, therefore, will be insignificant. The analysis shows that the Proposed Project without the parallel runway would cause 12 exceedences of the State 1-hour standard for carbon monoxide, 23 fewer exceedences than under the No-Action Alternative; and the Proposed Project with the parallel runway will not cause any exceedences of the 1-hour or 8-hour carbon monoxide standards.

With regard to air quality impacts at off-airport roadway intersections, the analyses indicated that the Proposed Project (with or without the parallel runway) would have positive impacts on roadway carbon monoxide emissions because it reduces the emissions at intersections of Hana Highway/Dairy Road and Hana Highway/Haleakala Highway; although the Proposed Project's emissions are forecast to be less than those forecast for the No-Action Alternative, they will still exceed both the national and state standards for carbon monoxide; and the Proposed Project will have insignificant impacts for all other pollutants, including nitrogen oxides.

COMMENT ME-4 - Increase in Population and Social Problems

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and

incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there

are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT ME-5 - Noise Pollution

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS. As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant

increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

COMMENT ME-6 - Airport Safety

We agree, the present airport is safe for large planes to land. However, large planes (B-747, DC-10, etc.) are unable to take off fully loaded due to the length of the present runway. This imposes a cost penalty on the flying public and causes the airport to operate inefficiently, which is a cost penalty to the residents of the State. As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands.

COMMENT ME-7 - Shuttle Flights

The analysis in the Draft EIS shows that there will be very little, if any, increase in the passenger levels at Kahului Airport with the Proposed Project. The analysis agrees with your statement that the shuttle flights are not a deterrent to visitors to Maui. The analysis is summarized in Sections 3.5 and 3.6 of the Draft EIS, and the entire analysis is presented in Appendix E.

The alien species introduction problem, as noted in the DEIS, is a statewide problem, but as has been said many times before, Kahului Airport and Maui Island are especially vulnerable because of the surrounding agriculture lands and valuable watersheds. I have watched large bodied ~~plants~~ ~~insects~~ ~~and~~ ~~other~~ ~~critter~~ ~~hiding~~ ~~in~~ ~~the~~ ~~wheel~~ ~~covering~~ ~~could~~ ~~drop~~ ~~out~~ ~~and~~ ~~not~~ ~~be~~ ~~to~~ ~~the~~ ~~airport~~. ~~A~~ ~~snake~~ ~~and~~ ~~other~~ ~~critter~~ ~~hiding~~ ~~in~~ ~~the~~ ~~wheel~~ ~~covering~~ ~~could~~ ~~drop~~ ~~out~~ ~~and~~ ~~not~~ ~~be~~ ~~seen~~ ~~for~~ ~~years~~ ~~as~~ ~~it~~ ~~and~~ ~~its~~ ~~off~~ ~~spring~~ ~~slither~~, ~~thrive~~, ~~and~~ ~~multiply~~! The international flights now coming from Canada are not apt to carry pests that would flourish here, as would flights from South East Asia ~~which~~ ~~the~~ ~~climate~~ ~~is~~ ~~much~~ ~~like~~ ~~our~~ ~~own~~. The Hawai'i Visitors Bureau recently signed a contract with a Bangkok based travel firm to sell Hawai'i in Thailand, Hong Kong, Singapore, Malaysia, Indonesia, Brunei, Sri Lanka, Myanmar, and Vietnam. All tropical countries with climates similar to Hawai'i's are rife with pests and diseases would flourish here. Millions of potential tourists to visit Hawai'i's economy but at what cost to Hawai'i's environment, and its people. Hawai'i's economy is totally dependent on our clean, beautiful environment, and healthy climate and no amount of hard-sell by the EFB could overcome the devastation that the wrong pest or disease would cause. The Alien Species problem is not only a Statewide issue it is a global issue. Hawai'i has an opportunity to use Maui as an example of how a program can be set in place to reduce the introduction of unwanted alien species. We must put in place now the very best equipment available and personnel to inspect all incoming planes, passengers, baggage, and cargo. The State's program at Kahului Airport today is shamefully inadequate. The final EIS should show what is going to be done or has been done by the time the final is completed. Safeguards must be done NOW.

Many proposed projects are not evaluated in the DEIS "the potential impacts or proposed mitigation measures will be addressed in a future environmental analysis and required documentation". The entire project and all bits and pieces of it should be evaluated in its entirety. This appears to be segmentation of the projects - we don't want surprises later on. One such concern of mine is the fuel line from the harbor to the airport. A line that is in a tsunami zone and will run along Kamaha Pond perimeter.

Water. The airport receives all its water from the I'ao aquifer and that aquifer is being tapped almost beyond its sustainable yield. Pipes on the airport property have been leaking and deteriorating for years and the amount of water loss is unknown. When will these pipes be replaced. The use of non-potable water needs to be required for both landscaping purposes and rental car washing. Landscaping should be done using native species that require little or no water. Conservation of water can and should be done now.

Wastewater. Here again broken and leaking pipes cause storm waters to infiltrate the wastewater system and overburden the sewage plant. This also has been a problem for years. Let's improve what we have now.

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT: Kahului Airport Improvements
Submitted by: Mary M. Evanson, P.O. Box 694, Makawao, Maui 96768

Mary M. Evanson

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT: Kahului Airport Improvements. May 1996
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Submitted by: Mary M. Evanson P.O. Box 694, Makawao, Maui, HI 96768

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DIRECTOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
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IN REPLY REFER TO:
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COMMENT ME-2 - Traffic Impacts

The discussion of the closure of Pulehu Road and the realignment of Hansen Road is included as part of the Airport Access Road and is shown on Figure 1-1 and discussed in Section 2.3 and 2.4 of the Draft EIS. We disagree with your opinion that the analysis for this element of the Proposed Project was not "adequately" addressed in the Draft EIS. The closure of Pulehu Road and Hansen Road was addressed in Section 3.22.8, Appendices M and P of the Draft EIS.

The cloverleaf interchange was analyzed in Section 3.22.8 and Appendices M and P of the Draft EIS. Alternatives for the cloverleaf were discussed in 4.6 and Appendices M and P of the Draft EIS. The alternatives studied included an: at-grade intersection, at-grade intersection with travel demand management, diamond interchange, single loop partial cloverleaf, and a full cloverleaf.

The traffic impacts of opening Alahao Street for permanent use is discussed in Section 8.1.1 and in Appendix M of the Draft EIS. The analysis discussed in Section 3.22.8 for the Year 2010 and in Appendix M includes both the Upcountry-Kihei Road and Puunene Bypass as part of the future roadway network.

COMMENT ME-3 - Glossary

Your comments have been incorporated into the glossary, and are as follows:

ASAP - Alien Species Action Plan.
INS - Immigration and Naturalization Services.
ISTEA - Intermodal Surface Transportation Efficiency Act.

COMMENT ME-4 - Road Names

The road names within the airport environs are shown on the figures pertaining to surface transportation, especially Figure 2-4 of the Draft EIS. However, the following road names have been added to other figures, as appropriate:

- Aalele St., Aiai St., Ala Luna, Alahao Street, Alamaha St., Amala Place, Aoloa Pl., Dairy Road, E. Hawaii St., E. Kauai St., E. Papa Ave., East Kanehamaha Ave., Eehia St., Eena St., Haleakala Hwy., Hana Highway, Hanakai St., Hanamau St., Hansen Road, Hemaloa St., Hobron Avenue, Hokuea Pl., Hoohana

Ms. Mary M. Evanson
P. O. Box 694
Makawao, Hawaii 96768

Dear Ms. Evanson:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT ME-1 - Purpose of the Runway Extension

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and state; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

The principal purpose for the runway extension is stated in Section 2.3.2, and is to: "(i) better accommodate those air carriers which currently serve destinations outside of the State of Hawaii, including mid-west, east coast and future international hubs; (ii) better accommodate future projected increases in passengers and cargo leaving Maui for destinations outside the State of Hawaii; and (iii) improve the efficiency and flexibility of aircraft use at the Airport and within the State."

St., Hukilike St., Kaa St., Kaahumanu Ave., Kahale, Kahiki St., Kala Road, Kaonawai Place, Kauwa St., Kele St., Keolani Place, Koheke St., Koloh St., Kuhea St., Kuihelani Highway, Kuula St., Lahou St., Lalo Place, Laoulu St., Leioni Pl., Lono Ave., Old Stable Road, Pashana Pl., Papa Place, Power Plant Road, Puaou St., Puakaia Pl., Puaolu St., Pulehu Road, Puunene Ave., S. Lanai St., W. Kauai St., and Waka Ave.

COMMENT ME-5 - National Park Service (NPS)

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the Federal Aviation Administration (FAA) and State of Hawaii, Department of Transportation (HDOT), Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process.

The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control. Also please refer to the response COMMENT ME-6 below.

COMMENT ME-6 - Alien Species

The alien species issue is summarized in Sections 3.11.1.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior NPS, Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the

HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic or international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations, general economic conditions, and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction

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may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS (see attachment "mitigation measures").

COMMENT ME-7 - Segmentation

The various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and long-term (Phase 3). The categorization of the projects is based on the existing and forecast demand. Obviously, the Phase 1 improvements are needed to meet existing demands and deficiencies, and the Phase 2 and Phase 3 projects to meet the aviation demands anticipated for that time frame. At this point in time, it is certain that the fuel pipeline may be a project beyond the Year 2010 planning horizon. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. As stated in Section 1.5.1, these long-range projects are analyzed in this Draft EIS to determine the individual and cumulative impacts as required by HRS Chapter 343 and NEPA.

However, given that the construction of these projects will occur, if at all, after the Year 2006, and, more likely near or after the Year 2016, the Draft EIS could provide an impact analysis for foreseeable impacts both individually and

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cumulatively. At this point in time, any more detailed analysis would be highly speculative and prone to error, for it is very likely that each of these long-term projects will undergo substantial changes over the next ten to fifteen years. For example, the scope, size, location and timing of the projects may be altered should air travel to and from Maui evolve and take shape differently than originally anticipated.

If and when the parallel runway, transient apron, helicopter facilities and fuel pipeline are defined in detail and submitted as projects to be implemented, each will be subjected to a more in-depth environmental review as required by state and federal law, e.g., Environmental Assessments, Findings Of No Significant Impacts (FONSIS) or Environmental Impact Statements.

The fact that the Draft EIS cannot provide a comprehensive environmental review of the long-term projects does not mean that the Draft EIS is deficient. Under NEPA, multi-stage projects such as this one can be "segmented" so long as the portions of the project that are fully analyzed in the Draft EIS meet the following criteria: (i) they have substantial independent utility, (ii) they do not foreclose the opportunity to consider alternatives to the more speculative, long-term projects that will be studied later, and (iii) they do not irretrievably commit federal funds for these projects.

The short-term (Phase 1) and medium-term (Phase 2) projects proposed for Kahului Airport and analyzed in the Draft EIS meet these three criteria. Each has substantial and independent utility. In fact, even if the Phase 3 projects were never implemented, the Phase 1 and Phase 2 projects would still be necessary and would still serve their intended purposes. The Phase 1 and Phase 2 projects also do not foreclose the opportunity to consider alternatives to the Phase 3 project proposals.

It is anticipated that the design, size, timing, location and need for the parallel runway, transient apron, helicopter facilities and fuel pipeline may change in the next ten to fifteen years. Because the Phase 1 and Phase 2 projects possess their own, self-contained utility, they in no way prevent the consideration of alternatives to the Phase 3 projects.

Lastly, the Phase 1 and Phase 2 projects do not irretrievably commit federal funds for the Phase 3 projects. Indeed, one of the reasons that the Phase 3 projects is speculative is that

- According to Council on Environmental Quality (CEQ) regulation 1508.28(b), tiering should be used to, "help the lead agency focus on issues that are ripe for decision and exclude from consideration issues already decided or not yet ripe." (emphasis added) Therefore, the Draft EIS focused on the short-term (Phase 1) and medium-term (Phase 2) projects, and deferred detailed analysis of the Phase 3 projects until a later date when they could be defined with greater precision and when the environmental effects could be determined more reliably and accurately.
- Due to public concern and as required by the Court-ordered stipulation, the Draft EIS also analyzes the impacts of realigning, widening and improving Alahao Street and extending it to the northeast to Hana Highway as a road open for public use and providing through traffic along the coastal side of Kahului Airport; and international flight operations including permanent and temporary (interim) international facilities. Note, however, that such international arrival facilities is not part of the Proposed Project.

COMMENT ME-8 - Fuel Pipeline

The potential impacts of the proposed alignment of the pipeline from Kahului Harbor to the Airport Bulk Fuel Tanks, as well as mitigation measures to minimize those impacts, are discussed in the following sections of the Draft EIS: Section 3.4 (Geology, Physiography, Soils, Agricultural Potential and Earthquakes); Section 3.8 (Water Quality); Section 3.10 (Historical, Architectural, Archaeological and Cultural Resources); Section 3.13 (Hydrology Floodplain Management and Drainage); and Section 3.20 (Solid Waste, Hazardous/Toxic Waste and Waste Wash Water).

If and when the fuel pipeline is constructed, it will be installed and operated by the Airline's fuel consortium, the Hawaii Fueling Facilities Corporation. As currently proposed, the pipeline would be aligned on the ocean side (north) of Kanaha Pond. Given this location, there is a potential for a significant impact on Kanaha Pond and coastal water quality should a leak or line break occur. However, the pipeline will be designed to include a "quick flush" system, double walled pipes, leak detection sensors and will meet applicable federal and state guidelines at the time of construction to minimize this risk.

The primary purpose of the proposed fuel pipeline is to reduce dependency on the fleet of fuel tanker trucks which currently

federal funding for such airport improvements is not and cannot be guaranteed decades into the future. Because the Phase 1 and Phase 2 projects are independent of the Phase 3 projects, funding for the former does not commit funding for the latter.

The following information is provided to further clarify this issue. (See attachment "segmentation")

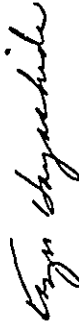
- The transient apron will be constructed, if at all, after the Year 2006. The parallel runway, long-term relocation of the helicopters, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks will be constructed, if at all, after the Year 2010.
- The Phase 1 and Phase 2 projects have utility apart from and independent of the parallel runway, transient apron, long-term relocation of the helicopters and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. Similarly, these Phase 3 projects have independent utility and are not reliant on the implementation of the Phase 1 and Phase 2 projects.
- If and when the time approaches that the parallel runway is required to prevent substantial deterioration of service at Kahului Airport, the FAA will prepare the required environmental documentation pursuant to applicable federal law addressing the proposed runway's environmental effects. Currently, it is anticipated that Kahului Airport will not require the parallel runway, if at all, until the Year 2010. Environmental documentation prepared closer to that time when the parallel runway would actually be constructed ensures that the environmental analysis will be more accurate and relevant.
- In addition, the State of Hawaii, pursuant to HRS Chapter 343, will prepare its own environmental documents for the long-term, Phase 3 projects at a later date closer to the actual implementation of the project. These documents will be either supplemental to this Draft EIS or independent studies. Again deferring study of the future projects to a later date increases the accuracy of the environmental analysis. It is also very likely that this Draft EIS, prepared in 1996, will be considered out of date and unreliable in the Year 2010, thus necessitating the preparation of a new environmental document at that time. Especially, due to the high probability that the long-range actions will change in size, scope, location, or timing.

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If you have any questions, please contact Mr. Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachments: as referenced above
c: Federal Aviation Administration (D. Welhouse)

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convey fuel to the Airport from storage facilities at Kahului Harbor. These trucks must travel along Hana Highway, Haleakala Highway, Kala Road and Eena Street to reach the Airport. Once the trucks arrive at the Airport, they must carry fuel cargo across Runway 2-20 to reach the air carrier aircraft parking apron adjacent to the passenger terminal. This requires clearance from the FAA Air Traffic Control Tower. It is generally accepted that fuel pipelines provide safer, more environmentally sound fuel conveyance system than that provided by tanker trucks traveling along public roads and across runways.

Due to the long-term, speculative nature of the fuel pipeline from Kahului Harbor to the Airport storage tanks, the EIS can only discuss potential impacts of this project in general terms. If and when the pipeline project is considered for construction, additional environmental documentation is required. However, at this time, we can state that the pipeline and all accessory equipment will be designed to meet seismic and tsunami hazards that may be experienced on Maui in general and specifically the facility location. This information will be included in the Final EIS. (See attachment "pipeline")

Lastly, in regard to the 1996 fuel line spill in Pearl Harbor, we note that the fuel line that failed was over 40 years old. Present technology and design standards are much more stringent than they were when the failed pipeline was designed and installed.

COMMENT ME-9 - Water Supply

The issue of the Proposed Project's impact on Maui's water supply is addressed in Sections 2.4.9, 3.22.1 and 5.1-5.2, and Appendix L. The Proposed Project does incorporate replacing of the older leaking lines, and a non-potable landscape irrigation system. In addition, the proposed mitigation measures incorporate the use of plant species that are salt tolerant and drought resistant, and the recycling of washwater for the rental car facilities.

COMMENT ME-10 - Wastewater

The impacts of the Proposed Project on wastewater is discussed in Sections 2.4.9 and 3.22.2.3, and Appendix L. The Proposed Project does include new wastewater lines and also provisions to abandon the use of the existing cesspools on the East Ramp.

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American Lung Association
of Hawaii
245 N. Kukui Street
Suite 100
Honolulu, HI 96817-3921
Fax: (808) 537-5971
Phone: (808) 537-5966



May 17, 1996

David J. Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850-0001

Dear Mr. Welhouse:

On behalf of the American Lung Association of Hawaii, I have reviewed the air quality impacts of the proposed improvements to Kahului Airport on Maui as discussed in the Draft Environmental Impact Statement (EIS).

We support the recommended Airport Master Plan as the preferred alternative. This plan calls for the addition of a second runway at Kahului Airport and related road improvements. It appears to lower air pollution markedly compared to the no-action alternative. We also support the plan to move commercial jets away from the terminal with "mules," as that will reduce hydrocarbon emissions around the terminal.

Please note an error in the last paragraph on page 3-69 of Volume I. The fifth and sixth sentences of this paragraph suggest that the carbon monoxide (CO) emissions from the proposed project "would be well within State and National standards." This is misleading, because these standards apply to ambient CO concentrations, not to emissions. The sentences should state that projected concentrations from estimated CO emissions comply with those standards.

Thank you for the opportunity to comment on this important project.

Sincerely yours,

Peter G. Flachsbert, Ph.D.
Director, Environmental Health Committee

PGF/nd

When You Can't
Breathe,
Nothing Else
Matters®

Founded in 1904, the American Lung Association includes affiliated associations throughout the U.S., and a medical section, the American Thoracic Society.

MAY 22 1996

DEPARTMENT OF TRANSPORTATION
GOVERNMENT



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Peter G. Flachsbert, Ph.D.
Director, Environmental Health Committee
American Lung Association of Hawaii
245 N. Kukui Street, Suite 100
Honolulu, Hawaii 96817-3921

Dear Dr. Flachsbert:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your letter of May 17, 1995 in support of the proposed Kahului Airport improvements. Your letter and this response will be appended to the Final EIS for review by the decision makers.

COMMENT ALA-1 - CO CONCENTRATIONS

The error noted in the last paragraph on page 3-69 of the Draft EIS will be corrected in the Final EIS per your suggestion (see attached).

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Attachment 1

Change to page 3-69 of the Draft EIS

The analysis shows that with the Proposed Project, the projected concentration from the estimated carbon monoxide emissions would comply with State and national standards and are substantially less than the emissions from the diamond interchange and the at-grade intersections. The emission levels at the intersections of Airport Access Road/Dairy Road, and Hana Highway/Spine Road/Hansen Road were forecast to meet the national standards but exceed the more stringent State standards.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

1517

DEJUAN/J. CAVETANO
DIRECTOR

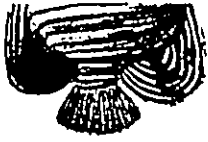


STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAZUMASA
DIRECTOR
DEPUTY DIRECTORS
GLENN O. OKUMOTO
Brian K. Minasi

WIRENY REFER TO
AIR-EN
97.925

August 20, 1997



Pokalani, Maui
16 May 1996

Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd. #700
Honolulu, HI 96819

Dear Mr. Miyamoto:

I am Barry Fried, a teacher of languages, music, and the owner of an ecology-minded tour company here on Maui. I have lived here for almost fifteen years. I am writing to express my opposition to the proposed Kahului Airport Expansion Project, especially to the very flawed Draft Environmental Impact Statement, for which your agency is responsible. I am afraid that this Proposed Project, if executed as planned, will result in the loss of Maui's uniqueness in many respects.

Most importantly, the Draft EIS fails to really tackle the issue of alien species introduction. I fear that direct international flights landing on Maui will greatly jeopardize the future of the many already endangered species in Haleakala National Park. A virtual "greenway" connects the airport with the Park's boundaries; the few roads in the area would definitely not impede the spread of introduced species.

Adding insult to injury, instead of consulting openly with the National Park Service on this tough problem, you affirmatively denied them any participation in the drafting of the EIS.

I have travelled extensively in the South Pacific, Asia, Central America, Europe, the Middle East, and the U.S. Mainland, so I am in a position to assert with some authority that Haleakala National Park is one of the world's great natural treasures. Though I have no background in biology, I can easily recognize the beauty in a virtually intact ecosystem such as Haleakala's: everything fits, there is a sense of balance. It gives me great peace to be there. I have seen destroyed ecosystems in Guam and Guatemala: the sense of imbalance in such places is sinister and disturbing.

As a longtime student of Hawaiian folkways and ethnobotany, I am also concerned about the Airport Expansion Project from a cultural angle. Many of Maui's already endangered plants and birds are very significant in Hawaiian cultural history. Some of the plants are still used as medicine. The Draft EIS fails to consider this very important potential impact.

Please give your full support in revising the Draft EIS to thoroughly address these concerns, and in doing so, please involve the National Park Service. Otherwise, the effort is hardly legitimate.

Thank you for taking the time to read my letter.

Sincerely,

Barry Fried

Barry Fried
PO Box 334
Makawao, HI 96768
808-572-3483

cc: Office of Environmental Quality Control, State Department of Health
David J. Wellhouse, Federal Aviation Administration

Mr. Barry Fried
P. O. Box 324
Makawao, Hawaii 96768

Dear Mr. Fried:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 16, 1997, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT BP-1 - Introduction of Alien Species

The alien species issue is summarized in sections 3.11.1.1, 5.1.5.1 and 6.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding

was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT BP-2 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT BP-3 - Effect of Project on Haleakala National Park

The HDOOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was

the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information

Mr. Barry Fried
Page 4
August 20, 1997

AIR-EN
97-925

prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of alien species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT BF-4 - Potential Effects of Proposed Project on Flora

The potential effects of the Proposed Project on the flora of the airport environs is discussed in Section 3.11.1 of the Draft EIS. As indicated, the Proposed Project will have an insignificant effect on the flora of the airport environs and will not directly affect the flora of the island outside the immediate airport area.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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1877



DENAUMUJI CAYETANO
CIVIL ENGINEER



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
GLENN H. OKAMOTO
Brian K. Mineai

PLEASE REFER TO
AIR-EN
97-922

August 20, 1997

Ms. Virginia Gardner
234 Holomakani Place, No. 1
Kula, Hawaii 96790-9412

Dear Ms. Gardner:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of April 15, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT VG-1 - Purpose and Need For Proposed Project

The purposes and need for the Proposed Project are described in Section 2.1 of the Draft EIS. As indicated, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

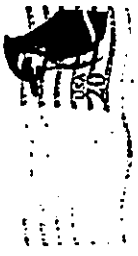
OUR NATIONAL PARKS
ARE NOT FOR SALE!

Congress has targeted our National Parks and other public lands for sale to commercial interests. NRDC is mobilizing millions of Americans to halt this sale to our national heritage.

*In disgust, we
a waste to send this
Monahan of material to
everyone interested in
preserving Pii ikaulu -
Pii ikaulu lifestyle and
charm. Help what the
tourists love for. How
should we feel for you be!*

NATURAL RESOURCES DEFENSE COUNCIL
410 AVENUE C, NEW YORK, NY 10011
Phone: 212-904-2500
Kula, Maui

See Comment VG-1



*El. K. Nodas Assoc. Inc.
615 Pii ika St.
Suite 300
Honolulu, HI 96814*

Rec'd by mail

KAHULUI, HAWAII
GOVERNMENT



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAZUHAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
GLENN M. ODOMOTO
Brian K. Minasi

PLEASE REFER TO
AIR-EN
97-923

Ms. Virginia Gardner
234 Holomakani Place, No. 1
Kula, Maui 96790-9412

Dear Ms. Gardner:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT VO-1 - Traffic

The potential effects of the Proposed Project on the surface transportation system are described in Section 3.22.8 of the Draft EIS. As indicated, the Proposed Project includes changes to the roadway network within and adjacent to the Airport, as well as changes to the Airport facilities themselves, which could affect activity levels at the Airport. In general, the analyses that were performed using accepted traffic analysis procedures and methods, indicated there will be positive, insignificant, and significant adverse effects on the surface transportation system. However, the Proposed Project in itself, is not expected to result in significant adverse effects on existing key intersections. Several existing intersections will be congested with or without the Proposed Project. That is, the expected natural population growth of the island will result in an increase in traffic regardless of the Proposed Project.

COMMENT VO-2 - Purpose and Need For Proposed Project

The purposes and need for the Proposed Project are described in Section 2.3 of the Draft EIS. As indicated, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of

We have been fighting for the preservation of our island home for so long. We have made it clear we don't want a large runway in Kahului. Projects are already conflicting about traffic & overdevelopment. It is shortsighted to plan our lovely island in order to provide short-term solutions. You need it before - "we need to better the place to save it". Please respect the Hawaiian culture and quality of life that is just disappearing with Maui's rapid growth. Please hear us.
Alaka,
Virginia Gardner

See Comment
152

0 1 2 3 4 5 6 7 8 9

Ms. Virginia Gardner
Page 2
August 20, 1997

AIR-EN
97-923

the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

CONHEAT VG-3 - Quality of Life

Quality of life is highly subjective and what may please one may not please another. The Proposed Project is in keeping with the transportation and tourism goals and objectives of the State and County as outlined in the State Plan and Maui County General Plan. These plans take into consideration the quality of life for the majority of residents and visitors to Hawaii.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

MAY 22 1996

Renate Gassmann-Duvall, Ph.D.
534 Olinda Road
Makawao HI 96768
Phone: Fax 808-572-1584
Email corvusce@maui.net

May 7, 1996

David J. Wellhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Box 50244 Honolulu, Hawaii 96850-0001

Owen Miyamoto
Department of Transportation
Airports Division
400 Rodgers Blvd, Suite 700
Honolulu HI 96819-1880

Dear Ladies and Gentlemen,

My Name is Renate Gassmann-Duvall and I am speaking on behalf of myself, my husband, daughter and son as well as the birds of Kanaha Pond. I have a background in veterinary medicine with a specialist's degree in avian medicine. I worked as the Veterinary consultant for the State of Hawaii from 1985 to 1990 for the Endangered Species Facility and I am a resident of Maui since 1986.

The sheer volume of the Federal Draft EIS made it impossible for me to review the environmental aspects in any depth. - therefore I will focus today only on some of the issues of airport expansion which impact our waterbirds, especially the endangered Stilt, Coot and Hawaiian Duck or Kolea.

Despite working for years on, and at, KPWS I gathered my most intensive knowledge in 1994 during my months long study at KPWS while on a federal grant, as well as through my position as Chair of the State instituted Kanaha Pond Advisory Committee. It was during this time that I had a first hand chance to partially observe some of the "Fatal or Bird Studies" described in Vol. 5. Those studies focussed on the question if noise or lights from airplanes flying at night in approach to runway 5-23 would cause disturbance of endangered water

birds. This runway will need to be closed for up to 2 months if runway 2-20 is ever lengthened.

On Dec 10, 1994 a field survey of the effects of night overflights by 5 large and 2 small aircraft on endangered wildlife at KPWS was conducted by HDOT-AIRPorts-Division. During the same time both myself, and my husband Fern (Biologist working for DLNR) positioned ourselves at the S/E corner of KPWS and also observed and recorded the birds' reactions to plane lights, and noises. Results between HDOT-AIR and our study were not comparable. Vol I, section 3.11.2.2 of the EIS states: No correlation between the Haw. Stilts responses and aircraft overflights, even though we recorded both disturbances and consistent reactions to the planes. Our observations showed that 2-3 Stilts flew away when large turbojet aircrafts were approaching. Other discrepancies also were noted, for example: even positions of HDOT observers for the observation periods were inaccurately mapped. (see appendix)

The conclusion: The field survey of night overflights conducted by HDOT-AIR on Dec. 10, 1994 for this EIS lacks accuracy, and its results of non-disturbance to birds are questionable at best. Mitigation plans still need to be better addressed for the impacts increased plane traffic, especially nighttime or low approaches, will have on the Hawaiian waterbirds at KPWS.

Furthermore the impact of increased air traffic with respect to the three wetlands makai of the airport should be studied more closely.

. Another serious threat to the KPWS and all of its vegetation and wildlife is the planned recommended development of a fuel pipeline from the harbor, along the makai border of the KPWS, to the airport. This pipeline, even if its development is scheduled several years from now, poses a severe problem since any break would put fuel into the KPWS. The pipeline is scheduled to be built underground, therefore it will be hard to detect breaks quickly. Also it will be in flood and tsunami zones, and vulnerable to damage. This pipeline should not be routed along any border of KPWS.

In conclusion, the draft EIS still contains misleading assessments, faulty study reports, and proposes developments which will cause severe environmental impacts. It is a shame so many trees and taxpayer dollars were sacrificed for such a shoddy result, especially since Maui does not need an expanded, or international airport.

Sincerely,


Renate Gassmann-Duvall, Ph.D.

See Comment RCP-1

See Comment RCP-2

See Comment RCP-3

DEWAMUJ CALELAND
DIRECTOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
889 PUNCHBOWL STREET
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KAHUHAZARUA
DIRECTOR
DEPUTY DIRECTORS
GLENNIA ODOMOTO
Brian K. Minaasi

IN REPLY REFER TO
AIR-EN
97.933

August 20, 1997

Renate Gassmann-Duvall, Ph.D.
534 Olinda Road
Makawao, Hawaii 96768

Dear Dr. Gassmann-Duvall:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 7, 1997, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT RGD-1 - Effect of Overflights on Kanaha Pond Birds

As you may be aware, worldwide, the presence of birds within airport boundaries is a constant safety problem and a number of researchers have tested various means to disturb and/or relocate the birds. Most tests have failed because the birds become habituated to airport noises. This is evidenced at Kahului by the Hawaiian stilts using the intermittent wetland areas for feeding and resting. It is the opinion of our consulting biologists that temporary overflights during the runway closure will not adversely affect either the Kanaha Pond habitat or the welfare of the birds using that habitat.

COMMENT RGD-2 - Effect of Overflights on Wetlands

The noise impacts on the three wetland areas will be similar with or without the Proposed Project. This noise contours are presented in Section 3.2.1 of the Draft EIS. In addition, there will be increased aviation activity with or without the Proposed Project.

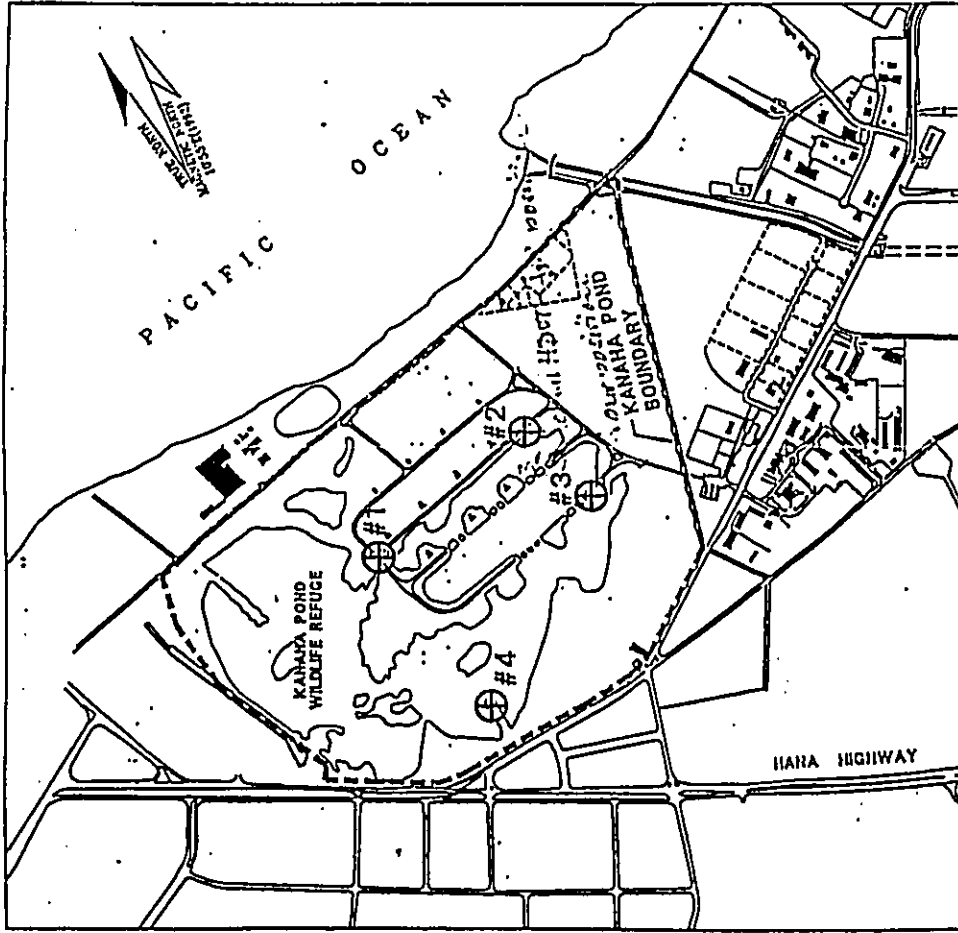


Figure 2:

LOCATION OF THE FOUR OBSERVATION STATIONS FOR THE NIGHT STUDY, DECEMBER 10, 1994, AT KANAHA POND, MAUI.

Vol III.] Field survey of Night Overflights

Renate Gassmann-Duvall, Ph.D.
Page 2
August 20, 1997

AIR-EN
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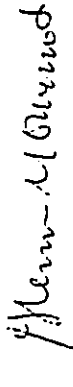
COMMENT RGD-3 - Proposed Fuel Line Routing

As described in the Draft EIS, Section 3.8, the proposed fuel pipeline will be designed and constructed in compliance with all applicable federal and State codes, rules and regulations to prevent the contamination of soil, runoff and groundwater. These regulations include the State's Wastewater Management Regulations, Uniform Building Code, and National Fire Protection Association, 40 CFR 112, U.S. DOT Regulations, Title 49, Part 195, *Transportation of Hazardous Liquids by Pipeline*.

Also, as indicated in the Draft EIS, the fuel pipeline from the harbor to the bulk fuel storage tanks is speculative at this time. However, proper design of the pipeline, such as the use of a "quick flush" system, double walled pipes, and adequate sensors, will minimize any potential effects of an accidental spill should it occur. All applicable rules and regulations which are applicable at the time of design and construction of the fuel pipeline will be adhered to. Because of the speculative nature of the fuel pipeline at this time, additional future environmental analyses will be required and conducted prior to construction.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,


KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

AUG 23 1997 10 01 AM

MAY 24 1996

DELMAR J. CAVEIANO
DIRECTOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

Elizabeth J. Grigson
RR2 Box 117A Middle Road
Kula, Hawaii 96790
May 20, 1996

David J. Welhouse
Federal Aviation Administration
Airport District Office
Box 50244
Honolulu, Hawaii 96850

Dear Mr. Welhouse:

I read with horror and dismay the recent article in the Haleakala Times concerning the devastating impact the Kahului Airport expansion will have on Maui's ecosystem.

As a tenant, and one of many loving caretakers of this beautiful island, I cannot sit back and watch as the FAA and the Hawaiian Department of Transportation attempts to strong-arm this expansion project through. It is not just the future of Haleakala National Park that is at stake, but Maui's entire fragile ecosystem, as well as the integrity of the entire island would be irrevocably damaged.

Taken in it's entirety, the EIS has not only been recklessly irresponsible in not addressing the Alien Species threat adequately, but blatantly derelict in it's duties and responsibilities by intentionally excluding essential and available information by experts in it's study.

The catastrophic consequences to Maui's environment from increased exposure to Alien Species through significantly increased Airline traffic at Kahului Airport is well known. I fully support any and all efforts to stop this unnecessary and unlawful expansion.

copy:Oven Miyamoto

Cordially,
Elizabeth J. Grigson

Elizabeth J. Grigson

KAZUHIYASHIMA
DIRECTOR
DEPUTY DIRECTORS
GUMBAI OKAMOTO
Brian K. Minns

WHERE REFERRED TO
AIR-EN
97.713

August 20, 1997

Ms. Elizabeth J. Grigson
RR2 Box 117A Middle Road
Kula, Hawaii 96790

Dear Ms. Grigson:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT EJV-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the United States

Ms. Elizabeth J. Grigson
Page 3
August 20, 1997

species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the Final EIS and the mitigation measures included as an appendix to the Final EIS. (See attachment "mitigation measures")

COMMENT EJO-2 - Information from Experts

As stated in Section 1.3.2, the EIS held meetings and consultations with various agencies and the public, while the document references for the Draft EIS are presented in Section 11. The input from these consultations and references were used in the preparation of the Draft EIS. In addition, the technical studies, if applicable, include list of persons or organizations which were contacted during the preparation of those studies. Therefore, the relevant information from experts and the public was used in the preparation of the Draft EIS.

In addition as indicated above, the Biological Assessment Team Panel has been formed to advise the FAA and HDOF on the Alien Species Biological Assessment. The team panels included members from the Nature Conservancy of Hawaii, Bishop Museum, the Department of Agriculture, U.S. Department of Agriculture, NPS, National Biological Service, Department of Land and Natural Resources, and as well as other experts. The Biological Assessment Team Panel has provided scientific reference materials as well as direct experience in the area of alien species control and has participated in the preparation of the Biological Assessment.

COMMENT EJO-3 - Increased Airline Traffic

An increase of aircraft traffic was comprehensively studies in the Draft EIS and presented in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts);

Ms. Elizabeth J. Grigson
Page 2
August 20, 1997

Department of Interior, FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOF issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international services could occur with or without the Proposed Project and is beyond the control of the FAA and HDOF. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOF have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien

Ms. Elizabeth J. Grigson
Page 4
August 20, 1997

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Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities.

The growth of aircraft traffic is documented in a revision of aviation demand forecasts for the sixteen State airports in October 1994, prepared by the State of HDOT, Airports Division. These demand forecasts reflect changes in worldwide economic conditions and their effect on the Hawaii visitor industry. The updated aviation demand passenger forecasts have been used as a basis for the impact analysis in the Draft EIS.

The aviation demand forecasts are used to determine the type and characteristics of new aviation facilities. As a result of the updated forecasts, the need for future demand-related facilities was shifted six years into the future. The updated forecasts indicate that there will be an increase in mainland U.S. passenger arrivals and departures from 1,281,797 (actual) to 2,041,000 in the Year 2010 and a potential increase in international passenger arrivals and departures from 0 (zero) now to approximately 511,000 in the Year 2010. Similarly, there is a forecast increase in interisland passenger arrivals and departures from 3,900,713 in the Year 1992 (actual) to 5,436,000 in the Year 2010.

The changes in the forecasts do not affect non-demand-related facilities of the Proposed Project. These non-demand-related projects are scheduled to be completed in Phase 1 of the Proposed Project and include the strengthening and extending the Runway 2-20, and associated taxiways, new airline ground support equipment and maintenance facility; installation of new fuel storage and loading facilities; and the interim relocation of the

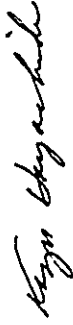
Ms. Elizabeth J. Grigson
Page 5
August 20, 1997

AIR-EN
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helicopter apron. That is, these projects are required regardless of the aviation demand forecasts and are planned to correct existing deficiencies at the Airport.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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DOCUMENT CAPTURED AS RECEIVED

AIR-EN
97.924

Ms. Liz Haase
Mailing Address Unknown

Dear Ms. Haase:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 3, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT LH-1 - Purpose and need for the Proposed Project

The purposes and need for the Proposed Project are described in Section 2.3 of the Draft EIS. As indicated, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

See Comment LH-1

May 3/96 Bob

Dear Mr Miyamoto

Ask you to re-consider the Maui Air Port project based on its impact on our little bit of wilderness. We can't keep on destroying this Islands in the sake of "expansion"

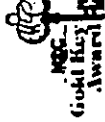
Thank you
Liz Haase.

Maui Marriott

ON MAUI AT NA'AHUPI'I BEACH



100 Moheka Kai Dr.
Lahaina, Maui, HI 96761-1984
(808) 667-1200 FAX: (808) 661-8575



June 20, 1996

Mr. Dave Welhouse
Federal Aviation Administration
Honolulu International Airport
Honolulu, HI 96813

Dear Mr. Welhouse,

I am writing this letter to express my support for the expansion of the Kahului Airport runway.

Being in the hospitality industry myself along with my staff's livelihood depends on the health and vitality of the tourism industry in the State and in particular on the island of Maui. We have seen the industry go through both "good" times as it allows us to keep everyone employed and working full time to provide the income needed to provide for their families.

It is my belief that the runway expansion is needed to keep the "good" times alive. As the world shrinks and tourism spreads and becomes more and more important to every nation, the need to stay competitive and hold on to what you have becomes more and more important. Without the expanded runway, Maui is in danger of losing what we currently have. Travelers will look at the multitude of opportunities afforded them and opt out of a destination that is more inconvenient than others. The inability of the Kahului Airport to provide a non stop travel route from many places could be the factor that tips their decision away from Maui and the State of Hawaii.

Thank you for taking the time to listen to my comments.

Sincerely,


Jim Hale
Controller
MAUI MARRIOTT RESORT

JH:rd

cc: Mr. Jerry Matsuda, Airports Director

REMARKS



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Jim Hale
Controller
Maui Marriott Resort
100 Moheka Kai Drive
Lahaina, Hawaii 96761-1984


Dear Mr. Hale:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your letter of June 20, 1996 in support of the proposed Kahului Airport Improvements. We appreciate your support of the Proposed Project. The purpose for the Proposed Project is stated in Section 2.3 of the Draft EIS. Your letter and this response will be appended to the Final EIS for review by the decision makers.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

100 MOHEKA KAI DRIVE LAHAINA MAUI HAWAII 96761-1984

ISAAC DAVIS HALL
ATTORNEY AT LAW
2007 WELLS STREET
WAILUKU, MAUI, HAWAII 96793
(808) 244-9017
FAX (808) 244-8728
April 4, 1997

OF COUNSEL
G. RICHARD DEGEN

Governor Benjamin Cayetano
State of Hawaii
c/o Office of Environmental Quality
Control
220 S. King St., 4th floor
Honolulu HI 96813

David Hinson, Administrator
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

Re: Supplemental Comments upon the Joint Federal and State Draft
Environmental Impact Statement for certain proposed Kahului Airport
Improvements; Kahului, Maui, Hawaii; TMK Nos. (II) 3-8-01 and 3-8-79

Dear Governor Benjamin Cayetano and Federal Aviation Administrator David
Hinson:

These comments are submitted on behalf of the Sierra Club, Mary
Evanson, Maui Air Traffic Association, Steven Pitt, James Bendon, the
National Audubon Society, Hui Alanui o Makena, Dana Naone Hall and Maui
Malama Pono, Inc. This letter will supplement the comments which we have
submitted earlier. A further source of information should be added to the
record and considered before accepting the Final EIS, as follows.

1. Comments of Ms. Terryl Vencel as Executive Director of the Maui
Hotel Association

The Executive Director of the Maui Hotel Association, Ms. Terryl Vencel,
appeared before the Budget and Finance Committee of the Maui County
Council on March 31, 1997 and made certain comments. These comments are
reported in an article which appeared in the Maui News on April 1, 1997. The
article is attached hereto as Exhibit "A".

Ms. Vencel noted that the Big Island has seen a 20% increase in Japanese
visitors because Kona's new, longer runway is sufficient to handle direct flights
from Japan. She is quoted as saying, "Maui is suffering from the lack of a
longer runway."

There are direct causal links between increasing the length of the
Kahului Airport runway to 9,600 feet and the facilitation of direct
international flights from Japan, with a potential increase of as much as 20%
in the number of Japanese visitors. These basic facts, readily acknowledged by
the Maui Hotel Association, are denied in the Draft EIS for the Kahului
Airport. The EIS cannot be accepted until these facts are incorporated within
the EIS and substantial portions of that document are revised. There can be no
justification for disregarding these facts or for ignoring the impacts which will
result from the internationalization of the Kahului Airport.

Please contact us if you have any questions about any of the above. We
look forward to hearing from you.

Sincerely yours,

Isaac Hall
For the Sierra Club, Mary Evanson,
Maui Air Traffic Association, Steven Pitt,
James Bendon, The National Audubon
Society, Dana Naone Hall and
Maui Malama Pono, Inc.

Dana Naone Hall
Dana Naone Hall
For Hui Alanui o Makena

III/DNH/jp
cc: Maui Malama Pono et al.
Office of Environmental Quality Control
David Welhouse

See Comment ID# 1

OPTIONAL FORM NO. 10
MAY 1962 EDITION
GSA FPMR (41 CFR) 101-11.6

FAX TRANSMITTAL

To: Jin D. H. Mac From: David Welhouse

By: E. K. Alady Date: 5/1-12/97

No: 593-8551 File: 5/1-3/62

FORM NO. 10-11-728 5010-101 GENERAL SERVICES ADMINISTRATION

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Isaac Davis Hall
2087 Wells Street
Wailuku, Hawaii 96793

Dear Mr. Hall:

Subject: Supplemental Comments upon the Joint Federal and State Draft Environmental Impact Statement (EIS) for Certain Kahului Airport Improvements, Kahului, Maui, Hawaii
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of April 4, 1997 on the Draft EIS on the Kahului Airport Improvements. (Previous comment letters were submitted on May 23, 1996 and June 21, 1996. These comment letters have been responded to separately). This letter is in response to your comments, which are attached for reference.

COMMENT IDH-1 - Comments by Ms. Terryl Vencil as Executive Director of the Maui Hotel Association

Your comment has been received and will be made available to the decision makers prior to a decision on the Proposed Project. The position of the hotel and visitor industry has been previously stated in their comments at the public meeting. Also, their views are stated in Section 6.5.1.1 and in Appendix E, and is as follows: "If the tourism experts are correct, then a lengthened runway might mitigate tourism downturns in some particular years, but not continuously."

We disagree that Kahului Airport and Kona International Airport can be treated as similar airports or situations, especially in the area of growth impacts. In addition, to assume that because Kona had a 20 percent increase it would translate to a greater than 20 percent increase to Kahului is a very simple analogy and speculative. The analysis in the EIS concluded that the

April 1, 1997 (New York)

Hotel group: No time to 'slack off' on promotion

Spend more on marketing, utilize culture, panel told.

By BRIAN PERRY

WAILUKU — Maui County officials are urging hoteliers to spend more on marketing and to utilize local culture in their promotional efforts, a panel of experts told.

County Board Chairman and Planning Commission Chairman Myron Link Credit said Maui's tourism industry is in a "strategic" year of opportunity. He said the industry's marketing efforts in 1997-1998 should focus on "making the most of what we have."

The Maui County Board of Supervisors is set to vote on a 20 percent increase in hotel taxes, which would be used to fund a marketing campaign. County officials are urging hoteliers to spend more on marketing and to utilize local culture in their promotional efforts.

Although hoteliers are urged to spend more on marketing, they are also urged to utilize local culture in their promotional efforts. The Maui County Board of Supervisors is set to vote on a 20 percent increase in hotel taxes, which would be used to fund a marketing campaign.

County officials are urging hoteliers to spend more on marketing and to utilize local culture in their promotional efforts. The Maui County Board of Supervisors is set to vote on a 20 percent increase in hotel taxes, which would be used to fund a marketing campaign.

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County officials are urging hoteliers to spend more on marketing and to utilize local culture in their promotional efforts. The Maui County Board of Supervisors is set to vote on a 20 percent increase in hotel taxes, which would be used to fund a marketing campaign.

EXHIBIT 'A'

Mr. Isaac Davis Hall
Page 2
August 20, 1997

AIR-EN
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short-term impacts would not be large as the international flights would probably serve the existing market. The growth impacts for Kahului Airport were analyzed in the Draft EIS, Appendix E, and summarized in Sections 3.5, 3.6, 6.0 and 8.2.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Ben M. Schlapak

BEN M. SCHLAPAK
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

ISAAC DAVIS HALL

ATTORNEY AT LAW
2087 WELLS STREET
WAILUKU, MAUI, HAWAII 96793
(808) 244-9017
FAX (808) 244-0175



RECEIVED

96 JUN 25 AM 8:36

UFC of Hawaii
QUALITY CONTROL

June 21, 1996

Governor Benjamin Cayetano
State of Hawaii
c/o Office of Environmental Quality
Control
220 S. King St., 4th floor
Honolulu HI 96813

David Hinson, Administrator
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

Re: Additional Comments on the Joint Federal and State Draft
Environmental Impact Statement for certain proposed Kahului Airport
Improvements; Kahului, Maui, Hawaii; TMK Nos. (H) 3-8-01 and 3-8-79

Dear Governor Benjamin Cayetano and Federal Aviation Administrator David
Hinson:

These additional comments are submitted on behalf of the Sierra Club,
Mary Evanson, Maui Air Traffic Association, Steven Pitt, James Bendon, the
National Audubon Society, Hui Alanui o Makena, Dana Naone Hall and Maui
Malama Pono, Inc. The OEGC Bulletin dated June 8, 1996 provided notice that
the comment period has been extended until June 22, 1996.

Comments which follow utilize the same numbering as in the DEIS and
as in our previous comment letter.

SECTION 1.0 INTRODUCTION AND SUMMARY

Section 1.8.3 Update of Hawaii Demand Forecast
Governor Benjamin Cayetano is the Chief Executive Officer for the State
of Hawaii responsible for establishing policy matters for all agencies including
the Airports Division of the State Department of Transportation. Governor
Cayetano gave a speech on June 13, 1996 at the year-end conference of the
Hawaii State Association of Counties at the Maui Prince Hotel in Makena,
Maui. According to an article published in The Maui News on June 14, 1996
Governor Cayetano reportedly:

At this time, these commenters also incorporate by reference the comments of the United
States Environmental Protection Agency, the United States Department of the Interior,
Haicakala National Park, the State of Hawaii Department of Agriculture, the Hawaiian Homes
Commission, the Department of Land and Natural Resources, State Historic Preservation
Division, the Office of Environmental Quality Control, the Environmental Center of the
University of Hawaii at Manoa, the Conservation Law Project, American Pacific Air, Inc. Dr.
Steven Moser, Councilmember Sol P. Kaho'ohalahala, and the Minutes of the August 17, 1995
meeting of the Maui County Council's Economic Development, Tourism and Environment
Committee which contain important information on the alien pest problem provided by Alan
Holt of The Nature Conservancy and Larry Nakahara of the State Department of Agriculture. As
soon as the Minutes become available to the public they will be sent directly to you.

See Comment ID#-1

... praised Hawaii Mayor Steve Yamashiro for persevering in
getting Japanese direct flights to Kailua-Kona.
These have begun, and Cayetano predicted they would
become daily by the end of the year. "This will soon be true here on
Maui" he added, once the Kahului Runway is lengthened.

If the Governor of the State of Hawaii is announcing that direct flights from
Japan will soon occur on Maui once the Kahului Runway is lengthened,
assuredly this is the position of the State Department of Transportation,
Airports Division.

Based on the above, there can be no justification for not studying the
impacts of internationalization along with any proposal to extend Runway
2-20 to 9,600 feet. A copy of this newspaper article is attached.

SECTION 4.0 ALTERNATIVES TO THE PROPOSED PROJECT

The DEIS should have examined an alternative which maintains the
existing runway lengths and relocates general aviation and helicopter
operations elsewhere. This would negate any airfield capacity problem within
the planning horizon utilized in the DEIS. This alternative should include the
provision of runway safety areas and runway protection zones that meet
current FAA standards and any other facility relocations necessary to correct
existing safety deficiencies, specifically the relocation of the airline ground
support equipment maintenance facility, the air taxi (scenic air tour) terminal
building and the VORTAC facility. The Kanaha Beach Park Improvements,
Alahao Street extension and additional air cargo facilities should also be
included. This alternative should be rigorously investigated and cannot be
rejected simply because maintaining the existing runway lengths will not
support direct, long-range departures of overseas flights with fully laden, large
aircraft.

Thank you for your assistance.

Sincerely yours,

Isaac Hall
For the Sierra Club, Mary Evanson,
Maui Air Traffic Association, Steven Pitt,
James Bendon, The National Audubon
Society, Dana Naone Hall and
Maui Malama Pono, Inc.

Dana Naone Hall
Dana Naone Hall
For Hui Alanui o Makena

cc: Office of Environmental Quality Control

See Comment ID#-2
End of ID#-1

Hawaii's economy recovering - Cayetano

Hawaii, noted the rate of ABE's 4.0... The conference was attended by a majority of the state's County Council representatives, many county agency heads and staffs, some business people who are regulated by the government, lawyers who represent clients in land use applications and a group of private citizens who are active in local government issues.

...and a conference today at Makaha Resort... Cayetano said state government has taken these steps to help diversify the state's economy.

...The key step was providing a comprehensive economic... Cayetano said state government has taken these steps to help diversify the state's economy.

...Cayetano said state government has taken these steps to help diversify the state's economy... Cayetano said state government has taken these steps to help diversify the state's economy.

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KAUAIKAWA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
KILIAN K. MINAII

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5037

August 20, 1997

Mr. Isaac Davis Hall
2087 Welles Street
Wailuku, Hawaii 96793

Dear Mr. Hall:

Subject: Comments on Draft Environmental Impact Statement (EIS) for Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your additional comment letter of June 21, 1996 on the Draft EIS for the proposed Kahului Airport Improvements, which was submitted on behalf of the Sierra Club, Mary Evanson, Maui Air Traffic Association, Steven Pitt, James Bendon, the National Audubon Society, Hui Alanui o Makana, Dana Naone Hall and Maui Malama Pono, Inc. This letter is in response to your comments, which are attached for reference. (A previous comment letter was submitted on May 23, 1996. This comment letter has been responded to separately).

COMMENT IDH-1 - Introduction and Summary - Update of Hawaii Demand Forecast

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. The Commentator has made the inaccurate assumption that international flights cannot occur at the airport until the runway has been lengthened. This is simply not true.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis

State's economy recovering - Cayetano

That's the best since 1991... Cayetano said state government has taken these steps to help diversify the state's economy.



BEN CAYETANO

...Cayetano said state government has taken these steps to help diversify the state's economy... Cayetano said state government has taken these steps to help diversify the state's economy.

MAUI NEWS

8/21/97

BY HARRY EGAN
Staff Writer

...Cayetano said state government has taken these steps to help diversify the state's economy... Cayetano said state government has taken these steps to help diversify the state's economy.

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of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreement vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop or direct flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

COMMENT NO. 2 - Alternatives to the Proposed Project

Various alternatives to the Proposed Project, including alternative airport sites and alternative locations for general aviation and helicopter operations, are discussed in Section 4 of the Draft EIS. The alternative suggested is similar to Alternative No. 1 which was analyzed in the Draft EIS. The major element missing in this alternative is the proposed Airport Access Road. The impacts of Alternative 1 and the elements of this proposed alternative are discussed in Section 4.0 of the Draft EIS. Therefore, this alternative will not be included for further analysis. However, we offer the following information.

The relocation of general aviation operations and facilities, including helicopter operations, to an off-airport site was studied as part of the Master Plan alternatives and also separately. The relocation of general aviation facilities is discussed in Section 4.4.3 of the Draft EIS. The Punaene site was one of the alternative sites investigated. As stated in the Draft EIS, a recent airspace analysis by the FAA in conjunction with the General Aviation Site Selection Study, concluded that there would be significant airspace conflicts with Kahului Airport. The

FAA would consider a general aviation facility at Punaene under certain airspace restrictions, including the use of a Air Traffic Control Tower at Punaene Airfield. The conclusion of the General Aviation Site Selection Study was to accommodate general aviation activities at Kahului Airport within the planning period.

As indicated in the Draft EIS, based on the investigations performed, no portion of the original airfield pavement would be suitable for fixed-wing aircraft operations, including small, general aviation aircraft, on a regular basis. Also, the time and costs of constructing new facilities and/or rehabilitating the existing deteriorated facilities would be prohibitive. With the updated aviation forecast, the parallel runway has been forecast to be needed beyond the Year 2010. Therefore, the relocation of the general aviation was not dismissed as implied by the commentator due to the lack of runway length to support direct, long range flights of overseas aircraft.

The Proposed Project and the Master Plan alternatives discussed in Section 4.3 of the Draft EIS, include provision for FAA compliance for safety areas, runway protection zones, relocation of the ground support equipment maintenance facility and the air taxi terminal building. The VORTAC facility has been constructed and is currently being tested. The aviation safety issues are discussed in Section 3.22.9 for the Proposed Project. The issue of aviation safety has been analyzed and discussed for the No-action alternative and for the different runway length alternatives for the Proposed Project in Section 4.0.

The alternatives analysis for the Draft EIS, studied the reasonable and feasible alternatives for the Proposed Project, in parts and as a whole, for all impact categories cited in the Draft EIS. As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

AIR-EN
97-1149

Mr. Isaac D. Hall
Page 4
August 20, 1997

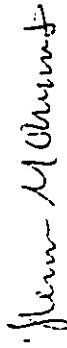
Although a part of the purpose and need is to increase the airfield capacity of the Airport, other elements of the Proposed Project, namely the runway extension, are to meet the purpose and needs for the Airport to: (i) better accommodate those air carriers which currently serve destinations outside the State of Hawaii, including mid-west, east coast and future international hubs, (ii) better accommodate future projected increases in passengers and cargo leaving Maui for destinations outside the State of Hawaii, and (iii) improve the efficiency and flexibility of existing and forecast aircraft use at the Airport and within the State. Therefore, the EIS evaluates different runway lengths and alternatives for this portion of the purpose and need.

The 7,000 foot runway does not allow for heavy aircraft to depart fully loaded to overseas destinations from Kahului Airport, therefore, not fulfilling the purpose and need of the Proposed Project. The impacts of the 7,000 foot runway are discussed in Section 4.3 of the Draft EIS. In addition, the Purpose and Need for the other elements of the Proposed Project, such as the commercial/FBO facilities, fueling facilities and Ground Transportation facilities are not fulfilled in your alternative.

Without the Airport Access Roadway, the ground vehicle traffic impacts would be similar to that of the No-action alternative. The No-action alternative is forecast to have significant traffic congestion within the planning period. In addition, there will be significant impacts in the categories of: (i) air quality, due to the increased congestion; and (ii) ground vehicle noise impacts for the residences along Dairy Road, due to the forecast increase of background traffic on Dairy Road.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Waihouse)

ISAAC DAVIS HALL

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May 23, 1996

UFC OF HAWAII
QUALITY UNIT

Governor Benjamin Cayetano
State of Hawaii
c/o Office of Environmental Quality
Control
220 S. King St., 4th floor
Honolulu HI 96813

David Hinson, Administrator
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

Re: Comments upon the Joint Federal and State Draft Environmental Impact Statement for certain proposed Kahului Airport Improvements; Kahului, Maui, Hawaii; TMK Nos. (II) 3-8-01 and 3-8-79

Dear Governor Benjamin Cayetano and Federal Aviation Administrator David Hinson:

These comments are submitted on behalf of the Sierra Club, Mary Evanson, Maui Air Traffic Association, Steven Pitt, James Bendon, the National Audubon Society, Hui Alanui o Makena, Dana Naone Hall and Maui Malama Pono, Inc.

The Joint Federal and State Draft Environmental Impact Statement ("DEIS") for the proposed Kahului Airport Improvements ("proposed project") is inadequate and unacceptable for multiple, important reasons. The DEIS does not satisfy basic, minimal requirements of the National Environmental Policy Act, 42 U.S.C. §§4321-4347 ("NEPA"), and Hawaii's law on Environmental Impact Statements, Chapter 343 ("HEPA"), and the regulations promulgated thereunder.

This five-volume DEIS does not comply with form, style and content requirements specified by state law. It is a confusing document and, in certain respects, purposely misleading. It fails "to convey the required information succinctly in a form easily understood, both by members of the public and public decision-makers." See H.A.R. §11-200-19. Undue cross-referencing is required within and among the five DEIS volumes, in violation of H.A.R. §11-200-14. Contrary to H.A.R. §11-200-14, the DEIS is "a self-serving recitation of benefits and a rationalization of the proposed action."

The preparers of the DEIS have not taken a "hard look" at the environmental consequences of the proposed project as a whole. Instead, the

proposed project has been illegally segmented. A number of important components of the proposed project with admitted significant adverse impacts -- including, but not limited to, international flight operations (facilitated by the 9,600 foot long runway), the introduction of alien species, the construction of an 8,500 foot parallel runway, the bulk fuel storage line -- have been deferred for environmental analysis to an unknown time in the future.

The State of Hawaii, Department of Transportation, Airports Division ("DOT-AIR") preparer reduced comments received on the prior state EIS for the Kahului Airport to general subject areas and then generated prepared uniform responses on these subject matters, regardless of the individual and specific points contained in the comments. Commenters are, however, entitled to responses which include: (1) point-by-point discussions of the validity, significance and relevance of the comments; and (2) a discussion as to how each comment was evaluated and considered in planning the proposed action. See H.A.R. §11-200-22(c).

The comments which follow utilize the same numbering system as in the DEIS.

SECTION 1.0 INTRODUCTION AND SUMMARY

A new subsection should be added to Section 1.0, which lists all of the assumptions relied upon in preparing the DEIS. This would be particularly informative because many of the assumptions are contradictory or unreasonable. In addition an index for each volume is necessary.

Sections 1.1 and 1.2 Project Summary and History
The discussion of the project summary and history is inaccurate. It is apparent that this DEIS has been prepared in a manner which violates the Court Orders discussed in this section.

Section 1.3 The Scoping Process
Fair consideration has not been given to the interests of communities and members of the public who will be affected by the project. There have been only two public hearings conducted during the preparation of the DEIS: the scoping session and the public hearing to receive comments after the publication of the DEIS.

Although H.A.R. §11-200-15(a) requires "a full and complete consultation process," and "agencies and applicants shall not rely solely upon the review process to expose environmental concerns," the DEIS states that the only non-governmental agencies consulted were The Nature Conservancy of Hawaii, the Pucco Coalition (a pro-airport expansion lobbying group), and A&B Hawaii, a corporate entity whose lands are proposed for acquisition for the Kahului Airport expansion. The EIS should disclose the number of occasions

¹ The commenters herein reserve the right to make further comments. These commenters also hereby incorporate by reference all other comments received, including prior comments submitted by consulting parties that demonstrate the inadequacy of this DEIS.

End of IDH-2

See Comment IDH-3

See Comment IDH-1

See Comment IDH-2

on which it met with the three non-governmental entities listed above to consult with them regarding the preparation of the DEIS, and the dates of any meetings. The EIS should also disclose whether or not any portions of the DEIS were shared with these entities and, if so, which specific portions.

The heading for Section 10.3 of the DEIS (see page 10-10) incorrectly states "List of Agencies/Persons Which Are Consulting Parties." This list does not include The Nature Conservancy, the Pucio Coalition, A&B Hawaii or any governmental agencies. While the individuals on this list -- including those who reside in communities near where the airport is located -- requested to be consulting parties, they were not contacted by any of the preparers of the DEIS and were not afforded the same consultation opportunities as were given to The Nature Conservancy, the Pucio Coalition and A&B Hawaii. Surprisingly, the Haleakala National Park was not consulted during the preparation of the DEIS. The DEIS was prepared in clear violation of H.A.R. §11-200-15(a) and §509(b)(4) of the Airport and Airway Improvement Act of 1982. This constitutes a substantial procedural error in the preparation of the DEIS.

The preparers of the DEIS have taken almost two and one half years to prepare and publish the DEIS. Interested persons have been allowed only a little over one month to comment on the five volume document. Given the sheer bulk of the DEIS, this has clearly been an insufficient amount of time for public review and the rights of interested persons to participate in the preparation of an adequate DEIS have been prejudiced.

Section 1.7 Areas of Controversy / Issues to be Resolved
This section is inadequate and should be rewritten based on the comments contained in this letter.

Section 1.8 Incorporation of Studies and Other Documents
Many important studies, reports and other documents have been incorporated by reference rather than attached to the DEIS. For example, most of the projects are proposed to meet "forecast demand." This demand is based upon a 1994 "Update of Hawaii Aviation Demand Forecast" which was not appended to the DEIS, although other less important documents were attached. The DEIS specified that this Update could only be reviewed in Honolulu after an appointment was made with an airports official.

Section 1.8.3. Update of Hawaii Aviation Demand Forecast

Forecast Demand

This subsection is related to, and must be considered in conjunction with Section 2.3 Purposes and Needs of the Proposed Project and Statement of Objectives and Section 2.5 Project Phasing. In Section 2.3, the following general purpose and need for the Proposed Project is given:

To continue to provide safe, efficient, economical and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the

year 2010 in a manner which accommodates existing and forecast aviation demands.

See also Section 2.3.2.

The DEIS states on page 1-22, that "the aviation demand forecasts are used to determine if and when new facilities are needed in the future." (Emphasis added.) On page 2-43 in the same volume, the DEIS states that actual design for the proposed improvements:

... will be initiated as actual aviation demand exceeds critical demand levels, typically 75 percent or greater of design capacity, and the necessary funding is available.

According to the General Aviation Site Selection Study, Appendix R of the DEIS, on page 8-1:

The 1993 operations demand-capacity ratio at Kahului Airport was 0.59. By 2015 the annual operations demand-capacity ratio at Kahului Airport is expected to increase to 0.91. Currently, approximately 40 percent of the Kahului Airport operations are by helicopters and approximately 18 percent are by fixed-wing general aviation aircraft.

Bearing in mind the operations demand-capacity at Kahului Airport of 59 percent in 1993 and critical demand levels of 75 percent or greater necessary to trigger the design of new facilities, the Kahului Airport Aviation Demand Forecast in Table 1-6 predicts a total operations demand-capacity increase of 15 percent by the year 2000 over the base year of 1992. The forecast also predicts a 29.5 percent demand-capacity increase by 2010 over the 1992 level.

Yet, actual figures available for 1989 (the base year for the prior-prepared state EIS), 1992 (the base year for the current DEIS) and 1994 (figures provided in Appendix R of the DEIS) do not support the Demand Forecast contained in the DEIS. For the five-year period from 1989 to 1994, total aircraft operations increased by less than one percent (+1,434 operations amounting to approximately .8 percent) and air carrier operations during this same period decreased by approximately one percent (-588 operations). Obviously, if the forecast figures are inflated, then the tremendous cost of DOT's proposed project amounting to more than 315 million dollars cannot be justified.

Earlier historical trends alone may not be an appropriate basis for justifying forecast figures particularly with respect to Maui, which has reached a mature stage as a visitor destination area. New international markets may be targeted if Kahului's main runway is lengthened, however, the DEIS refused to study the potential significant impacts of increased international flights to Maui.

1. The types of aircraft being used and an identification of whether the aircraft are Stage II or Stage III
It is impossible to address noise impacts if only the general category of the aircraft, e.g. general aviation, is identified. At a minimum it is necessary to identify (a) aircraft type (e.g. B747), (b) its noise characteristics and (c) whether it is a Stage II or Stage III aircraft. The DEIS assumes that there will be changes in fleet mixes and these changes should have been described in five year increments.

2. Segregation of nighttime aircraft operations
Information should have been included on those aircraft operations for which nighttime landings and/or takeoffs are anticipated, in five year increments, to the year 2010. It is almost certain that the general increase in aircraft operations that has been predicted will result in an increase in the number of nighttime operations. The lengthening of Runway 2-20 to 9,600 feet may also lead to an increased number of nighttime flights since an extended runway will accommodate domestic flights from more distant locations as well as international flights.

3. International flight operations
The DEIS does not include accurate or reliable information on international flight operations. The DEIS defines the "internationalization" of the Kahului Airport as the construction of permanent international facilities. It then states that those international passengers not using a permanent international facilities have been shown as domestic passengers. This is a deceptive and inaccurate manner of describing international flight operations. It is obvious that international flight operations can and will take place well before the construction of permanent facilities. The DEIS should be rewritten to provide complete and accurate information -- in five year increments from the base year onward -- on the number of operations and their origin or destination, and aircraft types and their noise characteristics, taking into consideration the following:

- a. Pre-clearance: that is, the number of international flight operations, in five year increments, that are pre-cleared or are anticipated to be pre-cleared, such as is currently the case for certain Canadian charter flights.
- b. Open Skies Treaties: that is, the Open Skies Treaties that are now in existence or are reasonably anticipated to be in existence, in five year increments, which now or can be reasonably anticipated in the future to lead to international flight operations.
- c. Carriers which now have the rights to conduct international flight operations at the Kahului Airport; that is, those air carriers, such as Japan Airlines, who through treaties or bilateral negotiations now have the right, or can be reasonably anticipated in the future to have rights to conduct direct international flights to and from Kahului Airport;

According to the DEIS, the extension of Runway 2-20 would result in an estimated 15 percent decrease in the number of interisland flights (see p. 3-50). This decrease will be the result primarily of direct nonstop international service. Between 1992 and 2005 mainland and interisland flights are forecasted to experience similar double digit increases, but by 2010 with the introduction of international flights, mainland flights will increase by 12 percent but interisland flights will only increase by 1.9 percent. By then almost one third of air carrier traffic (32 percent) will be mainland and international flights and just over two thirds (68 percent) will be interisland traffic, a change from the 1992 levels of approximately 24.75 percent mainland flights and 75.25 percent interisland flights.

The DEIS should be rewritten to include a clearer and more comprehensive analysis of the potential impacts of decreased market share for the interisland carriers caused by the commencement and increase of international flights to and from Maui. What are the anticipated economic impacts on the interisland carriers, especially since the Socio-Economic Assessment refers to developing a "Maui-Only" Japanese/Eastbound Market?

DOT's aviation demand forecast predicts that the number of military flights will more than double, increasing nearly 120 percent, from 1992 to the year 2000, and remain relatively steady thereafter to 2010. These figures give rise to questions, which the DEIS fails to answer. Air carrier and commuter/air taxis, the most numerous operations at the airport, are projected to increase operations by approximately 35 percent between 1992 and 2010, while military operations are forecasted to increase by a phenomenal 120 percent.

Where will the military flights be coming from and why the sudden predicted upsurge in these flights? Most importantly, why does the EIS fail to address the impact of this increase in flights especially when these flights may originate from international airports? As an example, the brown tree snake is known to have hitched a ride to Honolulu aboard military planes on more than one occasion in the past few years.

The DEIS should be rewritten to include a basis for the projected increase in military flights and the DEIS should also discuss the likelihood of these flights arriving during nighttime hours. The potential noise impacts of these flights, in particular on the Sprecklesville community, as single event noise occurrences during nighttime and early morning hours, must be discussed.

Nature of Forecast Demand Too Vague to Allow Environmental Review
The description of the current and forecast aircraft operations is too vague to allow for a proper analysis of the environmental impacts of these operations. All that has been provided is the number of aircraft operations, by aviation type. The following additional information should have also been provided, on a five year incremental basis.

d. International flight operations can take place once a temporary or interim international facility is constructed. The DEIS admits that a 9,600 foot long runway is necessary for regularly scheduled, economic direct flights to and from foreign destinations, with the exception of Canada. Information should be included on when DOT-AIR intends to construct or renovate a portion of the existing terminal for the temporary or interim facility.

DOT-AIR has taken the position in the court proceedings that it has no power or authority to prevent international flight operations. Having admitted that regularly scheduled, economic direct international flights, with the exception of flights from Canada, require a runway that is at least 9,600 feet long, the only control which this state and county and its citizens have over whether, and when, international flight operations will take place at Kahului Airport, is the decision on whether to extend the runway to a length which allows such flights.

Given the options of (a) pre-clearance, (b) Open Skies Treaties, (c) treaty rights or bilateral agreements for international operations at Kahului Airport and (d) the ability to construct interim FIS facilities, the DEIS should be rewritten to accurately disclose the anticipated number of international flight operations occurring in five year increments, once Runway 2-20 is extended to 9,600 feet. In addition, those international flight operations now described as domestic flights should be properly identified as international flights.

Finally, efforts are being made in Washington, D.C., Japan and other Asian countries by State and Federal officials to arrange for direct international flights to and from the Neighbor Islands, including Kahului Airport. Detailed information disclosing these efforts should be included in the DEIS.

Section 1.9 Summary of Land Use Compatibility and Permits and Approvals

1. FAA Approval of New Airport Layout Plan.
DOT-AIR seeks the approval of the U.S. Department of Transportation, Federal Aviation Administration ("FAA") for a new Airport Layout Plan pursuant to §511(a)(15) of the Airport and Airway Improvement Act of 1982, as amended ("AIA"). The Airport Layout Plan ("ALP") which is now in effect does not include proposed projects such as an extended Runway 2-20 or a parallel runway. Before federal funds can be provided for these improvements, a new Airport Layout Plan must be approved. The DEIS should be rewritten to include a discussion of the proposed, new Airport Layout Plan and its submission for approval by the FAA.

The new Airport Layout Plan which has been submitted for FAA approval is not contained in the DEIS, although other less important documents have been included. The ALP is attached as Figure 6-3 to the Kahului Airport Master Plan (1993). The proposed, updated Airport Layout Plan has become the

proposed project and Recommended Master Plan, as shown in Figure 2-9 in the DEIS.

Thirty, or more, projects are listed for approval in the new Airport Layout Plan. See Projects A - CC. Those components of the proposed Airport Layout Plan for which full and complete environmental review has been deferred -- including, but not limited to, the parallel runway, drainage improvements, the bulk fuel storage line and international flight operations (as facilitated by a 9,600 foot runway) -- should be deleted from the proposed Airport Layout Plan, the Master Plan (1993) and any grant application for federal funds. The proposed Airport Layout Plan should not be presented to the FAA for final approval until and unless full and complete environmental review has taken place.

2. FAA approval of the EIS and release of federal funds
Federal airport funds will be used to pay for 75-80 percent of the proposed airport improvements, with the exception of the proposed airport access road. These funds cannot be released until and unless (1) an adequate Joint Federal and State EIS is prepared, and (2) important factual and legal findings are entered by the FAA pursuant to §5509(b)(1)-(9) of the AIA. The DEIS should be rewritten to include a full discussion of these sections of the AIA.

The potential impacts of constructing the proposed airport access road and the closure of portions of Hansen Road, Pulehu Road and Haleakala Highway, and the construction of a new spine road have not been adequately disclosed in the DEIS. Significant short-term construction impacts will occur if these roadway projects are built and the DEIS should be rewritten to provide information on how long these projects will take to construct, and their effect on current traffic patterns. The DEIS should also be rewritten to explore alternative traffic improvements that would make the cost of constructing the airport access road and corollary closure of portions of the three roads unnecessary.

3. Federal Highways Administration approval of the EIS and release of federal funds for the proposed airport access road

Federal Highway funds will be used to pay for the proposed airport access road. This is a significant change in the project proposal. Previously airport revenues were to be used. DOT-AIR has represented in the past that the proposed access road will only be constructed if airport expansion projects are supported. The proposed airport access road is no longer "tied" to the expansion of the Kahului Airport. The DEIS should be rewritten to clarify this point.

SECTION 2.0. PROJECT DESCRIPTION

Section 2.3 Purposes and Needs of the Proposed Project and

Statement of Objectives

The DEIS does not address future goals and objectives of the County and State which conflict with the proposed airport improvements. Nor does the DEIS, as will be discussed in detail in the comments that follow, show that the proposed project will necessarily provide "safe, efficient, [and] economical" air transportation facilities. See §7.6 *infra*.

See Comment ID# 7

Section 2.4 The Proposed Project

Thirty (30), or more, projects are proposed in this expansion project.³ These are as follows:

- A. Reserve land for potential passenger terminal operation
- B. 8,500' parallel runway (2R-20L)
- C. Connecting taxiways for parallel runway
- D. 2,600' runway 2L-20R extension
- E. Airport access road and interchange
- F. Alahao Street/Old Stable Road emergency access
- G. Expanded ground transportation subdivision
- H. U.S. Post Office Site
- I. Post Office ramp access road
- J. Cargo facility
- K. General Aviation T-hangar
- L. Commercial aviation lease lots
- M. New scenic air tour facility
- N. Commercial aviation lease lots
- O. Cargo facility
- P. Large transient aircraft parking apron
- Q. Relocated airline ground equipment maintenance
- R. ARFF training facility
- S. Flight kitchen facility
- T. Perimeter road
- U. Bulk jet fuel storage facility
- V. Additional parking lot
- W. Kanaha Beach Park improvements
- X. Runway 5-23 taxiway realignment
- Y. East ramp access road
- Z. Relocated VORTAC site
- AA. New Aircraft Rescue and Fire Fighting Facility (ARFF)
- BB. Fuel line to ramp
- CC. Realign Hana Highway
- DD. Interim helicopter apron (not in Airport Layout Plan)

³ An issue remains as to whether DOT-AIR holds good title to the landing area of the airport. The 1986 Legislative Auditor's Report states that there are ceded lands within the Kahului Airport boundary. The DEIS does not contain any information or documentation establishing if, how or why the 1986 Legislative Auditor's Report is erroneous.

The DEIS declares that the strengthening and lengthening of Runway 2-20 is a "non-demand-related" facility that is "planned to fulfill existing deficiencies" and is not affected by the 1994 revised aviation demand forecast. This declaration ignores DOT's rejection of the alternative runway length of 8,500 feet for Runway 2-20 on the basis of one "principal deficiency" -- that the shorter runway length "is not long enough to provide for direct nonstop flights ... to all visitor markets, including ... potential future international destinations." (See p. 4-17.) As stated earlier, the DEIS refuses to adequately address and analyze the likelihood that nonstop international flights to Maui would commence upon completion, or soon after completion, of Runway 2-20's extension to 9,600 feet.

Section 2.4.4 Proposed Airfield Developments

The DEIS makes it clear that runway extensions to different lengths are indeed "valves" for picking and choosing the domestic and foreign destinations to be served by direct, nonstop flights to and from Kahului Airport. These are shown graphically in §I of the "Aviation Studies" attached as Appendix N. It is less well appreciated that the strengthening of a runway is also a "valve." This point is not acknowledged as candidly in the DEIS. Nevertheless, unless Runway 2-20 is also strengthened, more distant destinations cannot be accessed generally by direct, nonstop flights. The DEIS should be rewritten to describe the strengthening project in more detail. The effects of improving Runway 2-20 should be described in terms of the types of aircraft which could land and take off and the destinations which could be reached given different runway strengths.

Section 2.5 Project Phasing

Phasing

The Thirty projects are to be constructed in three phases: Phase 1 (1996 to 2002), Phase 2 (2003 to 2008) and Phase 3 (2009 to 2016). See Tables 2-3, 2-4 and 2-5.

Some of the components of the expansion of the Kahului Airport are, themselves, phased projects. The construction and expansion of West Side air cargo facilities takes place during each of the three phases as does the construction of the perimeter road and fencing of airport properties. The bulk fuel system is constructed in two phases -- the storage facility is constructed during Phase 1 and the pipeline is constructed during Phase 3. Helicopter operations are moved to an interim location during Phase 1 and to a permanent location in Phase 3. Lands are purchased for the parallel runway in Phase 2 and construction is scheduled in Phase 3.

Costs

Tables 2-3 to 2-5 set out cost estimates for the three phases of the proposed project. Contrary to the stated purposes and needs for the airport improvements, DOT's proposed project will be exceedingly costly and potentially uneconomical. For example, DOT was forced to scale back plans for

a new international terminal complex and people mover at Honolulu International Airport when airport revenues declined. The DEIS should be rewritten to include specific information on how the proposed project, with the exception of the airport access road, will be funded, including specific information on the amounts of funding anticipated from the various revenue sources (i.e. landing fees, leases and concessions, etc.).

Cost Estimates for Proposed Project - Phase 1
If Runway 2-20 is maintained at its present 7,000 foot length, the following costs, at a minimum, could be avoided:

- Land acquisition	\$2.09 Million
- Airfield Lengthening Runway 2-20	\$37.9 Million
- Strengthening Runway 2-20	\$10 Million ^a
- Airport support and infrastructure	
Perimeter/service road and fencing around extended Runway 2-20	\$1.3 Million
Install underground communications and electrical utilities along Hana Highway (see p. 2-42 for a discussion of the re-routing to accommodate the extension of Runway 2-20)	\$1.4 Million

In addition, the estimated cost to relocate the helicopter operation apron (interim helicopter facility) is not listed. The DEIS notes that this cost is "under study." On page 2-23, the DEIS states that the interim relocation of this facility is necessary because

([t]he close proximity of the helicopter operating apron to Runway 2-20 (less than 1,000 feet) causes missed approaches for aircraft arriving on Runway 2-20. Also, there is a limited line-of-sight of the helicopter apron from the FAA ATCT. Therefore, it is proposed that the helicopter operating apron be relocated to an area east of the helicopter hangar area. This would provide a greater separation between the fixed-wing aircraft arrivals on Runway 2-20 and the majority of helicopter takeoffs and landings, and would provide a clear line-of-sight from the FAA ATCT.

The DEIS also notes that this relocation will increase the margin of safety at the Airport. The DEIS should be rewritten to address whether this conflict and potentially unsafe condition could have been avoided with better planning, thereby avoiding the undisclosed cost of relocating this facility. The DEIS also should be rewritten to address whether or not any of the cost of relocation will

^a A good portion, although not all, of this cost could be saved since some repaving and possible strengthening must be done due to pavement distress caused by the landing of large jet aircraft on the runway.

involve reimbursement or payment to the helicopter operators as a result of the relocation.

Cost Estimates for Proposed Project - Phase 2

A smaller, far more modest airport improvements project would cost dramatically less than DOT's proposed project. Some of the avoided costs would include, but not be limited to, the following:

- Land Acquisition Parallel runway	\$8.75 Million
- Airport Support and Infrastructure	
Extend perimeter/service road and fencing around northwest side of Airport (to accommodate Runway 2-20 extension and parallel runway)	\$.57 Million

Cost Estimates for Proposed Project - Phase 3

- Airfield Parallel runway and parallel taxiways	\$115.74 Million
- Terminal Area Complex	\$18.355 Million
Transient aircraft parking apron (a smaller facility may be warranted given the potential significant impacts on burial sites)	
- Airport Support and Infrastructure	
Perimeter/service road and fencing around parallel runway	\$3.2 Million
Realign Hana Highway at northeast end of Airport to accommodate parallel runway	\$3.4 Million
Provide lease lot for flight kitchen (not necessary if Runway 2-20 kept at 7,000 feet)	\$.653 Million

The cost of constructing a fuel pipeline from Kahului Harbor is "undetermined," according to the DEIS. This project, which would cost millions even if the exact amount is not known, should be scrapped since the potential environmental hazards of such a project are significant.

Additional Comments on Project Costs and Project Phasing

The proposed project is designed "to provide safe, efficient [and] economical" transportation facilities. The sheer cost of the proposed project, well in excess of 315 million dollars, does not appear to make the project economical, particularly since some of the costs are to correct prior planning decisions by DOT and the FAA.

In addition to the relocation of the helicopter operation apron mentioned earlier, two other components of the proposed project involve relocations

the north of the intersection of the runways was completed in 1995. (Emphasis added.)

The DEIS further states that

... a 1,000-foot clear area should be maintained around the new VORTAC location east of Runway 2L-20R to protect the facility from encroachment by structures or other objects that could adversely impact its performance.... (See p. 2-35).

A component of DOT's proposed project is another relocation of the VORTAC facility (see Figure 1-1). The DEIS does not disclose the cost of the first relocation of VORTAC, which was completed only last year, nor is the specific cost of a second relocation given. The DEIS should be rewritten to explain the reason for having to relocate the VORTAC facility for a second time in such a short period of time.

Expansion of Kanaha Beach Park
Even though the expansion of Kanaha Beach Park has the uncontested support of Maui's residents, DOT has placed this component of the proposed project in Phase 2 (2003-2008). Currently, Kanaha Beach Park is heavily used by residents and visitors, and expansion of this popular park should occur during Phase 1. If DOT refuses to designate the expansion of Kanaha Beach Park facilities as a Phase 1 project component, the DEIS should be rewritten to explain DOT's reasons for not doing so. In addition, the size of the park expansion should be larger than what has been proposed by DOT-AIR to meet present and future needs.

Land Acquisition

Approximately 588 acres of land, at an estimated cost of 10.94 million dollars, are proposed for acquisition by DOT (503 acres for airport use and 85 acres for aviation easements). All of the land to be acquired is currently owned by A&B. Most, if not all, of the land is classified as agricultural land. The DEIS should be rewritten to explain the basis for the estimated costs and why the acquisition costs for these lands varies so widely, including a brief discussion as to the differences in cost of obtaining fee simple title as opposed to an aviation easement.

Phase 1
Aviation Easement
(45 acres/\$32,000 an acre) 1.44 Million

Land Acquisition
(9 acres/\$72,222 an acre) 650 Thousand

Phase 3
Land Acquisition
(488 acres/\$15,348 an acre) 7.4 Million

necessitated by safety considerations. The DEIS discloses on page 2-22 that the current airline ground support equipment maintenance facility "is located improperly with respect to the Building Restriction Line of Taxiway 'F'." The cost of this relocation is estimated at 800 thousand dollars. Similarly, the air taxi (scenic air tour) terminal building "is located improperly within the BRL of Runway 2-20." (See page 2-25.) The cost of relocating this facility is 1.278 million dollars.

The DEIS does not discuss why it was decided to relocate only the helicopter operation apron in Phase 1, while delaying the correction of two other improperly located facilities from the standpoint of airport safety, until Phase 2. This would appear to be an improper phasing of the proposed project.

With further regard to safety, why did DOT place the upgrading of Runway Safety Areas (RSA) for Runways 2-20 and 5-23 in Phase 3 when the DEIS acknowledges that the RSAs for both runways do not meet current FAA standards? Constructing RSAs for Runways 2-20 and 5-23 that meet current FAA criteria in Phase 1 (estimated cost one million dollars) would improve the margin of safety immediately for aircraft using these runways.

The DEIS identifies an additional safety problem on page 2-13:

Because of the ATCT's (Air Traffic Control Tower) location relative to terrain and buildings that have been constructed adjacent to the East Ramp, certain portions of the apron used by helicopters cannot be seen by controllers. This complicates the task of controlling the ground movement of these aircraft. The northernmost portion of the new passenger terminal obstructs the controllers' views of Taxiway "H", portions of Taxiway "F", and the commuter terminal apron. (Emphasis added.)

The DEIS does not discuss any way of mitigating this problem. The DEIS should be rewritten to discuss this issue in more detail, including a discussion as to whether any FAA criteria or recommendations are not being met regarding the operation of the airport.

VORTAC Facility

The DEIS notes that an Environmental Assessment was prepared (and a Negative Declaration was issued) for the relocation of the FAA's Very High Frequency Omnidirectional Range/Tactical Air Navigational ("VORTAC") facility at Kahului Airport in July 1993. On page 2-7, the DEIS states the following:

The VORTAC is located 500 feet from Runway 5-23 and 638 feet from Runway 2-20. The FAA recommended that it be relocated to an area at the approach end of Runways 20 and 23 to eliminate signal problems that are believed to be related to new construction in the terminal area. The construction of the relocated VORTAC at

* Building Restriction Lines (BRL) are proposed to prevent the construction of buildings in areas where they would interfere with the operation of the airfield." See p. 2-32.

Land Acquisition (2 acres / \$50,000 an acre)	100 Thousand
Avigation Easement (40 acres / \$31,500 an acre)	1.26 Million

Costs of Mitigation Programs
 The costs for the project are actually a great deal larger than has been disclosed because the considerable costs of the mitigation programs have not been included. It is an indication of the incompatibility of the proposed project with the surrounding areas that expensive mitigation measures are required.

The costs of the proposed mitigation programs to decrease vehicle noise to acceptable levels has not been described. The cost of the proposed noise mitigation program to mitigate aircraft noise levels has not been included. DOT-AIR proposes to condemn a number of homes in the Sprecklesville area; however the costs of this condemnation have not been computed and disclosed.

DOT-AIR also proposes to sound attenuate a number of residences in the Sprecklesville area. The Part 150 Study, attached as Appendix O to the DEIS, discloses that DOT-AIR has not yet even contracted with an engineer to determine what specific sound attenuation measures will be used for Sprecklesville homes. The sound attenuation which has been implemented in communities surrounding airports throughout the United States has been extremely expensive.

The DEIS should be rewritten to describe the funding sources for sound attenuation projects, including sources which are no longer available. The DEIS should disclose how long it will take DOT-AIR to obtain the necessary funds for sound attenuation. In many mainland communities, the airport proprietor or the municipality within which the airport is located has had to provide funds for sound attenuation.

SECTION 3.0 AFFECTED ENVIRONMENT, PROBABLE CONSEQUENCES AND MITIGATION MEASURES

Section 3.1 Introduction

Illegal Segmentation
 When component actions are phases or increments of a larger total undertaking, the group of actions "shall be treated as a single action." H.A.R. § 11-200-7. The environmental impacts of all phases of this project, treated as a single action, should have been addressed in the DEIS. In addition, the cumulative impacts of airport projects which already exist and other existing and planned projects in the vicinity should have been addressed along with the proposed projects. It was a clear error, therefore, not to include an analysis of the impacts of the ARFF, ARFF training facility, and certain other projects, within the DEIS.

The DEIS fails to completely address long range developments which it is required to do by Court Order, NEPA and IEPA. The DEIS states on page 3-1:

... the full impacts of the larger projects in Phase 3, namely the parallel runway, relocation of helicopters off-airport, the fuel supply pipeline from Kahului Harbor to the bulk fuel tanks, and transient apron ... cannot be properly assessed at this time...

and

... prior to the construction of these long-range projects additional environmental analysis will be completed in order to determine what, if any, further environmental documentation is required.

It is suggested that significant archaeological, cultural and historic resources may be adversely affected by several of these Phase 3 projects. The DEIS states, on p. 3-86:

The transient apron, fuel pipeline from west of Kalia Inlet Gulch and the parallel runway and associated facilities which occur in Phase 3 of this project may impact significant archaeological features. These impacts will be assessed in future environmental documents for these projects.

The DEIS states, with respect to the bulk fuel supply line from the Harbor to the Airport's fuel storage facility, on p. 3-77, that:

... this pipeline may have a potential impact on Kanaha Pond and the coastal water quality if leak or breakage occurs ... prior to the construction of this project additional environmental analyses will be completed in order to determine what, if any, further environmental documentation is required.

The DEIS declines to study the noise impacts created by the parallel runway, on pp. 3-10 through 3-11, stating:

... prior to the construction of these long-range projects additional environmental analysis will be completed in order to determine what, if any, further environmental documentation is required.

The DEIS declines to assess the impacts of direct international service to the Kahului Airport because "no permanent FIS facility is planned" See p. 8-6. The DEIS states on p. 8-12 that:

... since the 1993 Master Plan does not propose to add permanent international arrivals facilities at Kahului Airport, this issue will be addressed in a future environmental document prepared for that purpose.

All of the above amply document that the preparers of the DEIS have declined to conduct a complete and full environmental review of "all phases of

End of IDH-1

See Comment: IDH-5

east ramp in Phase 2 constitutes an irrevocable commitment to retain the General Aviation facilities at Kahului Airport so that the parallel runway must be constructed, even though the environmental impacts of the parallel runway have not been fully and completely studied.

d. International flight operations
The DEIS declines to study the impacts of international flight operations at Kahului Airport until a permanent FIS facility is proposed and constructed. Runway 2-20 is proposed to be lengthened and strengthened in Phase 1 of the project. A primary purpose of the lengthening and strengthening, according to the DEIS, is to accommodate international flight operations. Runway lengths less than 9,600 feet are rejected because these lengths are not long enough to provide for direct non-stop flights to and from international destinations. DOT-AIR cannot be permitted to lengthen and strengthen Runway 2-20, in order to allow direct flights to and from international destinations, until and unless a full and complete analysis is prepared, which studies the environmental impacts resulting from direct non-stop international flight operations.

Inconsistent Assumptions
The authors of the various supporting studies contained in the Appendices have all predicated their environmental analysis upon the adoption of various assumptions. There is no reasonable basis for many of these assumptions. Often these assumptions are contradictory. The DEIS should be rewritten to bring together in one section all of the assumptions that have been applied by the preparers of the DEIS, including the preparers of the special studies contained in the Appendices. Placing all of these assumptions together in one place will disclose how severely limited the DEIS has been in its study of the impacts of the expansion project.

No Support for Findings of No Significant Impact
In general, there is no proper support for the many findings contained in the DEIS that components of the project will have no significant impact on the environment and that no mitigation measures are necessary. The data included does not support these findings. Often, admissions are contained within the DEIS or within the appended special studies that various components will have significant adverse impacts.

It is plain that this project may have a significant impact on natural resources including, but not limited to, fish and wildlife, natural, scenic and recreational assets, water and air quality, and other factors affecting the environment. Feasible and prudent alternatives to many of these components exist. All reasonable steps have not been taken to minimize these adverse effects. No viable mitigation programs, with the ability to actually reduce impacts to acceptable levels, have been presented for adoption in the DEIS.

the project" and that they have failed to treat all components of the project as "a single action." The DEIS effectively segments the majority of Phase 3 of the proposed project and declines to evaluate these impacts.

An additional problem which this causes involves the commitments that are made to Phase 3 projects through the construction of or commitment to components in either Phase 1 or Phase 2. Because these earlier commitments will have already been constructed or acquired, an irrevocable commitment will have already been made to subsequent Phase 3 components in violation of NEPA and HEPA. Some examples are provided below.

a. The parallel runway. The DEIS states that a full and complete environmental analysis will take place prior to the construction of Phase 3 projects beginning in 2009; however the Master Plan proposes to purchase the land for the new parallel runway for almost 7.5 million dollars and to acquire an aviation easement for the parallel runway for 1.26 million dollars during Phase 2. It would defeat the purpose of NEPA and HEPA to purchase the land for the parallel runway before the environmental impacts of that parallel runway had been fully and completely addressed. See Tables 2-4 and 2-5.

b. The bulk fuel line and storage facility
The DEIS proposes to construct the bulk fuel storage facility for 1.36 million dollars in Phase 1 and to construct the fuel pipeline from the Kahului Harbor to the bulk fuel storage facility, in Phase 3, for an undetermined amount. 1.366 million dollars will have already been committed to this two-phased project before the environmental impacts of the supply line are completely studied. This is especially egregious because the DEIS acknowledges that the supply line could have significant adverse impacts.

During the last several weeks, a fuel supply line along Pearl Harbor breached causing serious adverse impacts to near shore ocean water ecosystems. The impacts of the proposed fuel line located immediately next to Kanaha Pond Wildlife Refuge must be studied before the bulk fuel storage facility is constructed during Phase 1. See Tables 2-3 and 2-5.

c. Construction of General Aviation facilities at the Kahului Airport

The DEIS states that Kahului Airport will reach its airfield capacity during the planning period and admits that there are only two basic options for expanding this capacity: (1) building a new General Aviation airport elsewhere or (2) constructing a third (parallel) runway at Kahului Airport. See Appendix R, p. 2-6. The DEIS declines to include a complete study of the environmental impacts resulting from the construction of the parallel runway. Yet in Phase 2, various general aviation projects are proposed to be constructed at the Kahului Airport, including General Aviation T-hangers (4 million dollars), new Scenic Tour facilities (1.278 million dollars), commercial aviation lease lots (5.51 million dollars), and a portion of the east ramp access road (1.0 million dollars). The construction of all these General Aviation improvements on the

Section 3.2 Noise

Unreasonable Assumptions

The entire analysis of noise in the DEIS is premised upon two unreasonable assumptions: (1) that all aircraft will be Stage III by the year 2010 and (2) that Runway 2-20 will be used exclusively for takeoffs and the parallel runway will be used exclusively for landings. Even with the considerable aid of these assumptions, the DEIS is only able to conclude that noise impacts will not get any worse than they already are now.

There is no reasonable, documented, factual basis established in the DEIS for the assumption that all aircraft will be Stage III by the year 2010. The DEIS does not take into consideration that (a) Hawaii has been exempted from the provisions of the Airport Noise and Capacity Act which require air carriers within the contiguous 48 states to convert to Stage III fleets by the year 2000, or shortly thereafter; (b) DOT-AIR had an opportunity to forbid Stage II aircraft from landing or taking off at the Kahului Airport during nighttime hours and refused to do so; (c) DOT-AIR agreed to take appropriate steps to limit the use of Stage II aircraft generally at the Kahului Airport by the year 2000 and now has refused to do so and (d) the dumping of Stage II aircraft (being phased out on the mainland) in Hawaii, is now occurring such that Aloha Airlines has converted to an all-Stage II fleet. Under these circumstances, it was wholly unreasonable to assume that all aircraft will be Stage III by the year 2010.

Similarly, it is wholly unreasonable to assume that once the parallel runway is constructed, Runway 2-20 will only be used for takeoffs and the parallel runway will only be used for landings. The DEIS justifies the construction of the parallel runway by a need to increase airfield capacity. The assumed restricted uses of these two runways undermines the purpose of the parallel runway. This assumption has been adopted to avoid dealing with what is already widely known: takeoffs from the parallel runway will dramatically increase the already significant aircraft noise impacts being imposed upon the Sprecklesville community.

The DEIS should be rewritten, and the noise impacts of this project restudied, without the aid of these two assumptions. The DEIS states on p. 3-10 in footnote 6:

As stated earlier, a full analysis of the parallel runway would be performed at a later date, with more definitive information on aircraft mix and runway operational use. If any of the assumptions are changed, the noise contours would change accordingly. (Emphasis added.)

Without these assumptions, it is clear that the expansion of the Kahului Airport will cause substantial increased significant adverse aircraft noise impacts. It will also be clear that the mitigation program which is being proposed is inadequate.

Before any runway strengthening or lengthening can be permitted to occur and before any parallel runway can be constructed, an effective noise mitigation program which actually reduces aircraft noise to acceptable levels must be funded, implemented and in place. This type of condition has been required at other airports throughout the United States and it is absolutely essential that it be required here as well.

DOT-AIR has recognized for many years that mitigation measures are necessary but has failed, in all these years, to implement any effective mitigation program. Residents would prefer that operational measures be implemented, rather than non-operational measures. DOT-AIR has favored the sound attenuation of residences, community centers, schools and churches upon which unacceptable levels of aircraft noise are being imposed. Even with respect to these non-operational measures, DOT-AIR has taken no decisive steps to implement a sound attenuation program. Until this occurs it will not be possible to conclude that all reasonable steps have been taken to minimize the effects of airport noise pollution.

Failure to Address Impacts Between 1994 and 2010

The DEIS is defective because it only purports to study the difference in noise impacts between the years 1994 and 2010. Even if Stage III aircraft were to miraculously and voluntarily disappear from use in Hawaii by the year 2010, there would be a continued use of Stage II aircraft between 1994 and 2010. The noise impact analysis should have addressed noise impacts in five year increments, as the FAA has recognized in the past. Such an incremental analysis would amply demonstrate that significant adverse impacts would be imposed upon surrounding communities for a great majority of the time leading up to the year 2010.

Therefore, the DEIS should be rewritten to include an analysis of noise impacts on a five year incremental basis, recognizing the continued use of Stage II aircraft. In parallel fashion, a mitigation program should be designed to reduce these impacts to acceptable levels during each of these five year intervals.

Failure to Address Nighttime Noise

The DEIS should have included an adequate analysis of nighttime noise impacts. These impacts were never segregated and analyzed separately.

Failure to Use Other Noise Metrics

The DEIS should have included an adequate analysis through the use of other noise metrics, including single event noise levels. The single event noise level analysis contained in the DEIS was based on an analysis of only one flight track. If the Part 150 study is cross-referenced, it will be clear that many flight tracks are used at the Kahului Airport. An analysis of all flight tracks should have been included. The DEIS selects one of the flight tracks with the least noise impacts and left out tracks with obviously more severe impacts.

Failure to Address Noise Impacts of Parallel Runway
The DEIS states on p. 3-13 that:

The impact may be potentially significant with the parallel runway. However, prior to the construction of these long-range projects additional environmental analysis will be completed in order to determine what, if any, further environmental documents or mitigation measures are required.

This is unacceptable based upon NEPA, HEPA and existing Court Orders. The DEIS should be rewritten to study the significant adverse noise impacts which would result from full use of the parallel runway.

Failure to Address Noise Impacts of Strengthening Project

The DEIS does not adequately address the noise impacts which will result when and if Runway 2-20 is closed for the strengthening project. A statement is included on p. 3-21 that:

During this time period, residents of Kahului, Wailuku and Sprecklesville will incur increased overflights and noise impacts.

However these impacts are not addressed. There is no study indicating the change in noise levels, which will occur during this period, using different noise metrics.

Failure to Address Noise Impacts on Parklands

The DEIS has not adequately addressed the noise impacts upon adjacent parks and recreational areas, and does not address at all the noise impacts imposed upon users of Kanaha Park. Nor does the DEIS adequately address noise impacts upon the Kanaha Pond Wildlife Sanctuary.

The imposition of these noise impacts upon adjacent parklands constitutes the constructive use of these parklands. Prudent and feasible alternatives exist to this constructive use. No mitigation measures have been proposed to effectively decrease airport noise levels to acceptable levels. All reasonable steps have not been taken to minimize these adverse impacts.

Section 3.3 Land Use

Kanaha Pond Wildlife Sanctuary

The Kanaha Pond Wildlife Sanctuary constitutes the primary habitat for three endangered species, the Hawaiian Stilt, the Hawaiian Coot and the Hawaiian Duck. The Endangered Species Act requires that this habitat be managed in a fashion which aids the recovery of these three species and leads to an increase in their numbers. The Endangered Species Act does not place aviation interests above the interests expressly stated in the Endangered Species Act.

The FAA and DOT have permitted the State Department of Land and Natural Resources (DLNR) to manage the Wildlife Sanctuary so long as aviation interests are superior to wildlife management interests. The FAA and DOT have steadfastly refused to relinquish ownership and unconditional management responsibilities to DLNR. DLNR has unfortunately agreed in a Memorandum of Understanding that the Kanaha Pond Wildlife Sanctuary will be managed with respect to aviation interests. One of these aviation interests is to not allow species to increase in number because such an increase may lead to further killings of endangered species by aircraft landing and taking off at the Kahului Airport.

The DEIS proposes actual and constructive uses of the Kanaha Pond Wildlife Sanctuary which may have significant adverse impacts upon the sanctuary. A bulk fuel line from the Kahului Harbor to the airport is proposed to pass alongside the Kanaha Pond Wildlife Sanctuary. This bulk fuel line may have a significant adverse effect on fish and wildlife, natural and recreational assets and water quality. It has not been established that no feasible and prudent alternatives exist. Nor has it been established that all reasonable steps have been taken to minimize the adverse effects which will result.

The introduction of alien species will occur at a greater rate with the extension of Runway 2-20 to 9,600 feet. The Wildlife Sanctuary lies within airport boundaries, immediately adjacent to airport runway and terminal areas. Due to the hospitable climate and vegetation, it is likely that introduced alien species can readily find their way to the Wildlife Sanctuary and cause significant adverse effects to natural resources, fish and wildlife, and other important assets. There has been no study of whether feasible and prudent alternatives exist. It certainly has not been demonstrated that all reasonable steps have been taken to minimize the adverse effects to the Kanaha Pond Wildlife Sanctuary which will occur through the increased rate of alien species introductions as a result of the extension of Runway 2-20 to 9,600 feet.

Prime Agricultural Lands

Prime agricultural lands are proposed to be purchased and taken out of agricultural production to facilitate the expansion of the Kahului Airport. The Hawaii State Constitution forbids the reclassification of these prime agricultural lands under the circumstances presented. Efforts are made in the DEIS to justify this reclassification because of A&B Hawaii's willingness to sell these lands and the existence of a large number of agricultural lands on the island of Maui. These attempted justifications cannot obscure the fact that the loss of 588 acres of prime agricultural lands constitutes a significant loss of farm lands and a significant adverse impact to agricultural interests.

Section 3.4 Drainage Impacts

The analysis of drainage impacts contained within the DEIS is totally inadequate. The DEIS falsely claims that runoff from the airport will not be discharged into the ocean. Runoff discharged into Kaliahnuai Gulch is ultimately discharged into the ocean. Runoff from the airport which is discharged into wetland areas and sandy areas on the northern side of the

airport, near the ocean, percolates into the ground and is carried into the ocean.

The ocean waters near the Kahului Airport are Class A waters according to the Department of Health, State of Hawaii. These waters are to be protected for recreational interests and to conserve the marine habitat.

The Coastal Zone Management Act has recently been amended on the federal level to require even more stringent controls over land-based developments -- the runoff from which affects water quality, the marine environment and recreational interests in near shore ocean waters. The DEIS does not include information on the amount of runoff currently being generated through the use of the airport and the increased amounts of runoff that will be generated through the construction of the proposed project.

The DEIS does not compile any information on the chemical content of the runoff from the current uses at the airport or from the proposed project. A portion of the runoff from fuels, oils, greases and other industrial and urban pollutants, on the runways, taxiways, apron areas and parking lots are and will be discharged into the ocean.

This runoff will cause a significant adverse impact on natural resources, fish and wildlife, recreational assets and water quality. No effort has been made to address feasible and prudent alternatives. Nor has it been demonstrated that all reasonable steps have been taken to minimize these adverse impacts.

This runoff also constitutes an actual or constructive use of park lands. The runoff impacts cannot be rendered insignificant by speculating that they constitute only one percent of the 100-year flow from Kaliahnuh Gulch.

Section 3.5 Socio-Economic Impacts

The most apparent flaw in this section concerns the DEIS's assertion that the socio-economic impacts of the proposed project will be insignificant until 2010 and the advent of international passengers.

The DEIS states that

Traffic volume estimates for regularly scheduled international flights at Kahului Airport have been made on the assumption that service would begin in the year 2010. (See page 8-4.)

The forecasts based on this assumption estimate that "there would be a total of 511,000 ... direct international passengers in the first year of service."

Based on the estimated number of passengers, DOT forecasts that Kahului Airport will receive approximately two international flight arrivals each day beginning in the year 2010. As a reference point, Japan Airlines will initiate international flight service to Keahole-Kona Airport beginning next

month on a three flights a week basis. The DEIS does not provide any information concerning the validity of the estimated number of international passengers and the number of flights that will be necessary to accommodate these passengers.

It stretches credibility and conflicts with a number of statements contained in the Socio-Economic Assessment (Appendix E) to believe that without any buildup, Kahului Airport will receive up to two international flights every day in the year 2010. The far more likely scenario is that international flights will be added incrementally, beginning on a much more modest basis, on the order of JAL's current plans for Keahole-Kona Airport.

The DEIS refuses to base its socio-economic analysis on the assumption that lengthening Runway 2-20 will afford the immediate "facilitation" of direct nonstop international flights. This refusal is all the more troubling given the following statements from Appendix E:

Known Interest of Japan Airlines in Maui Routes: It appeared to be common knowledge in the tourism and airline communities that Japan Airlines (JAL) is strongly interested in establishing nonstop service to Maui, assuming appropriate amendments to its bilateral agreement rights. It was further expected that, if JAL's experience is successful, other Hawaii carriers with Hawaii-Japan routes -- such as Continental and Northwestern -- could attempt to enter the Maui nonstop-flight market. (All Nippon Airways is considered a more distant prospect for Maui service, since it has currently suspended even its Honolulu service.)

The DEIS acknowledges in Appendix E on pages 7-30 to 7-31 that the numbers in Exhibits 7-N and 7-O:

... suggest substantial impacts on eastbound visitor levels; less substantial but still significant impacts on cumulative (total) visitor figures.... (Emphasis in text.)

The following statement appears on page 7-32:

Exhibit 7-O shows an increase of 2,950 eastbound visitors on Maui each day, which again represents a 24% increase over the number expected without nonstop flights.

The DEIS Socio-Economic Assessment discloses that the combined domestic and international impact on visitor units for the preferred alternative of 9,600 feet would mean an increase of "2,830 total units, which is approximately equivalent to about six fairly large hotels." The socio-economic assessment acknowledges that there is a strong sentiment among Maui residents, especially in Lahaina and Kihei, against the building of more hotels.

The DEIS predicts a maximum 21 percent increase in the number of visitors from international flights, which the preparers of the document acknowledge constitutes a significant impact with regard to a wide range of socio-economic issues.

The DEIS must study the impact of international passengers beginning in Phase 1, concurrently with the extension of Runway 2-20, and not defer this study until the year 2010.

Section 3.6 Secondary (Induced) Socio-Economic and Economic Impacts

See §6.0 infra.

Section 3.7 Air Quality

The air quality analysis is deficient in several respects. As with the State EIS, the consultants used a screening model to predict the likelihood of AQS exceedences from the airport. Again, only criteria pollutants were evaluated, with the overriding objective to predict worst case conditions at the airport boundary. No Prevention of Significant Deterioration analysis was performed. Analysis of impacts at receptor sites removed from the airport boundary was limited to 5 intersections which are very near the airport and at least 3 of which are already known to exceed AQS. Further, the analysis once again fudged on its worst case scenario, using only Pasquill Gifford stability classes 4 and 5. Although considerable effort was spent to justify this omission, a worst case analysis would utilize IFR conditions, with stability class 6. This combination should have been used in at least one model run.

Despite acknowledging that this was both theoretically possible, and that class 6 conditions had historically occurred at the airport, the consultants elected to use only stability class 5 for morning scenarios and stability class 4 for afternoon scenarios. Worst case conditions may also have been associated with higher temperatures than were used. Air pollution incidents causing illness and even death, are not typically associated with normal meteorological conditions. Instead, these are associated with inversions which can last several days. Residential and commercial areas (including schools and old age facilities), are located near and downwind of the airport. Some of these are prone to frequent inversions which generally last beyond the early morning hours and which do occur in the afternoon as well. Fumigation can often be observed in the Kahului power plant plume heading toward these areas. Analysis of the cumulative impacts on these neighborhoods and of air quality deterioration at the National Park should have been performed.

The consultants mention that the entire State of Hawaii is considered an attainment area. This is consistent with historic understanding of air quality. However, the validity of this statewide attainment status must be called into question when one learns that at the intersections of Hana and Haleakala Highways, Hana Hwy. And Dairy Rd., and Puunene Rd. and Kulihehane Hwy, state and national AQS are exceeded. This is further brought into question

by gross inadequacies in both existence of data and use of existing data in pages 18 to 23 of the analysis. Not only is data very sparse, but monitoring stations appear to be ill placed to measure the contaminants for which they are used. For instance while the largest source of Sulfur Dioxide appears to have been the power plants, the monitoring stations for this are in an area which would not generally receive wind currents from the power plant. Further, data from the central isthmus, the center of industrial and commercial activity, is used to estimate baseline data. Baseline data on air quality at the national park should also have been included for Prevention of Significant Deterioration analysis. The State has failed to monitor some of the criteria pollutants since the 1970s and others since the mid 1980s. In the absence of adequate baseline data, impacts can not be properly evaluated.

The document leaves the reader with very little confidence that the State has the skill or the will to monitor impacts of this project over time. In this regard, one also wonders how 1992 carbon monoxide emissions from aircraft were estimated as lower than in 1980. Given the substantial increase in air traffic over those years, the figures in tables 4 and 5 are suspect even with better air pollution control aboard. Even more so is the comparison of table 19 to table 4, in which 1994 carbon monoxide emission estimates are lower than those in 1980, and nitrogen oxide, hydrocarbon and sulfur oxide estimates are lower for 1994 than for 1992.

The assumptions were also flawed in stating that 1994 conditions could be utilized to represent baseline. By 1994, several related facilities, including the expansion of rental car lots and construction of the terminal and several major commercial areas had been completed. The University of Hawaii's "The Hawaii State Environmental Impact Statement System: Review and Recommended Improvements", lists over 20 negative declarations for airport related projects between the years of 1976 and 1989. Aside from the fact that this flies in the face of procedural propriety, it makes clear that the impacts of the entire project can not be faithfully evaluated by beginning in 1994.

Only 6 air pollutants are regulated in ambient air at the federal and state levels. However, nearly 200 contaminants are recognized as toxics under the Clean Air Act. Given that many of these are emitted by aircraft and airport related facilities, the fact that consideration of non-criteria pollutants was limited to a single paragraph acknowledging that "trace" levels of "other" air pollutants would occur, but that methodologies were not available to quantify their emissions, was inexcusable. The consultants state that mobile source emissions result in lower ambient concentrations than point source emissions. This statement is open to challenge, since mobile source emissions are typically emitted closer to the breathing zone of larger populations. The document then states that even though these sources are not subject to the same regulation, significance criteria based on stationary source have been used to be conservative. Even assuming we accept this much as reasonable, the analysis hangs itself. Significant levels of toxic pollutants include greater than 10 tons per year of a single pollutant, or a combination of pollutants totaling over 25 tons per year. Oddly enough the report refers to a 1980

pollutant emission inventory from the State DOH, and says that this is the most recent data available. However, a 1988 document, also from DOH states that formaldehyde emissions alone from aircraft operations in Hawaii total over 500 tons per year. Over 92 tons of this formaldehyde release was attributed to 1985 emissions at the Kahului airport, which was at that time the second largest source after Oahu. Benzene releases from fuel storage alone were over 28 tons per year.

The aforementioned, benzene and formaldehyde are only two of the toxics known to be associated with aircraft. Typical airport pollutant inventories include polycyclic aromatic hydrocarbons, formaldehyde, benzene and dioxins as a minimum. Airplanes and airport related operations are known to release not only the criteria pollutants, but also the following as a minimum: benzene, formaldehyde, dioxins, methylene chloride, polycyclic organics, PCBs, naphthalene, radionuclides, sodium hydroxide, sulfuric acid, chlorobenzene, ethylbenzene, trichlorobenzene, chromic acid, sulfuric acid, toluene, mixed isomers of xylene, aluminum sodium silicate, polycyclic organic matter, pyridinium, isomers of dodecane, isomers of tetradecane, isomers of pentadecane, methane, ethane, ethylene, propene, acetylene, butene, heptane, octane, acetaldehyde, acrolein, and others. Surely in combination, these releases can not be considered "trace", when formaldehyde emissions alone from 1985 operational levels were single handedly the second largest non-agricultural source of air toxics in the state.

Cumulative impacts have also not been considered with regard to related impacts. Construction of various related commercial ventures which have also impacted emissions from the other largest sources of non-agricultural air toxics in the state. Following the list, automobiles and trucks have increased with increased use of rental vehicles, as well as increased road traffic from related construction of commercial and industrial properties, waste water treatment and dry cleaning have and will continue to increase, arguably more based on the airport and related projects. Certainly gasoline marketing fuel storage have increased, as have emissions from residual oil combustion for power generation and from distillate oil combustion, emissions from solid waste disposal, including the incinerator on A&B property have and will continue to increase, construction emissions from asphalt and cement manufacture and paving, petroleum refining, automotive repair, polyurethane foam manufacture, and so on. Virtually all of these sources of air toxics will arguably be impacted by the expansion and internationalization of the airport.

The analysis lists air pollution control measures on page 5. Four potential measures are listed, with no commitment to performing them, nor discussion of how they will be implemented. A fifth, specious measure reflects the poverty of the assumptions used in the analysis and plugged in to the model. The document states that maximizing airport capacity could lower pollutants by minimizing queuing times. The proposed project will amplify marketing efforts, with the sale of international routes to airlines, and fly and drive packages and other tourist offerings to consumers. With these additional marketing efforts, one has to question that the expansion will in fact decrease

queuing times as has been assumed in the analysis. Similarly, one wonders why the citizens of Maui are held hostage such that necessary road improvements will not occur without the construction of the run-way. Instead of discussing that fact, peak hour queuing for the no-action alternative is estimated at 13.1 planes as compared to 1.9 for the preferred alternative. How could the lengthening of a runway increase airport efficiency seven fold? This kind of flagrantly misguided assumption in turn reflects on the veracity of the analysis.

For modeling purposes, it may be acceptable to assume no addition of vapor control on the existing tanks under 40,000 gallons. However, for mitigation of airport related pollution, installation of improved vapor control at new storage facilities under consideration should have been discussed. These new storage facilities are of some concern, because their size, location and emission controls are neither spelled out nor wrapped in to any analysis. It is conceivable that if more fuel storage is moved to Maui, these could be an additional source of substantial releases even with improved vapor handling.

No effort has been made to assess the potential cumulative impacts of air quality degradation on human or animal populations, either through direct inhalation or through deposition of contaminants from air onto water bodies. Exposed populations of humans and animals should be identified, sensitivities delineated and impacts discussed.

In its limitation to criteria pollutants, flawed assumptions, inadequate baseline data and failure to examine all risks in depth, except for those most heavily regulated, the analysis fails to either estimate, address or disclose fully air quality impacts.

Section 3.8 Water Quality
See Section 3.4 above. The project will have significant adverse impacts upon water quality.

Section 3.9 Department of Transportation Act §410
See Sections 3.3 and 3.4 above. The project constitutes an actual and/or constructive use of Kanaha Pond Wildlife Sanctuary (alien species introduction, fuel line, noise) and Kanaha Park (noise, drainage) triggering a 4(f) analysis.

Section 3.10 Historic, architectural, archaeological and cultural Resources

The potential impacts of the proposed project on historic, including archaeological, and cultural sites has not been addressed in the DEIS because the archaeological inventory level survey work has not been completed. This work must be completed before an accurate impact assessment can be made. This work should be completed and the DEIS should be revised accordingly prior to the publication of the Final EIS.

On page 1-29, the DEIS does acknowledge that:

... the East Ramp improvements and the Kanaha Beach Park improvements in Phase 2 of the Proposed Project may impact archaeological features, specially buried cultural deposits, depending on the amount of subsurface excavation needed. The Phase 3 improvements, such as the expanded runway safety areas for Runways 5-23 and 2-20, the extension of the Runway 5-23 parallel taxiway, construction of the perimeter road and fencing may disturb subsurface deposits. In addition, the transient apron, fuel pipeline from west of Kailiinui Gulch, and the parallel runway and associated facilities which occur in Phase 3 of this project may have a significant impact on buried archaeological features. These impacts will be assessed in future environmental documents for these projects. (Emphasis added.)

To begin with, it is not all certain that the construction of Phase 1 components of the proposed project, including the lengthening and strengthening of Runway 2-20, will not have significant impacts on archaeological, historical and cultural features. For example, the extent of Site 1798, which consists of a burial and reburial site, and subsurface wall and pondfield deposits, is not known. Therefore, it cannot be ascertained as to whether or not Phase 1 components will negatively affect these resources, requiring the development of mitigation measures.

Furthermore, the known existence of burials at site 1798 requires that a Burial Treatment Plan be prepared and submitted to the Maui/Lanal Islands Burial Council for Council determination regarding the disposition of the identified burials. If the Council determines that the burials are to be preserved in place, the proposed location of the transient aircraft parking apron may have to be changed. Furthermore, the requirements of the National Historic Preservation Act will have to be met for this and other sites.

Section 3.11 Biotic communities

The DEIS analysis of the impacts upon flora and fauna is inadequate and needs to be rewritten. DOT-AIR has acknowledged that more than 75 percent of the alien species introductions which occur in Hawaii take place through air travel and at airports. The strengthening and lengthening of Runway 2-20 to 9,600 feet will cause an increased number of introductions than would otherwise occur. The impact of these increased introductions will be experienced island-wide. These introductions will have significant adverse impacts upon endangered flora and fauna throughout the island.

The DEIS inadequately addresses the incompatibility of the Kanaha Pond Wildlife Refuge and the Kahului Airport. Kanaha Pond pre-existed the airport by thousands of years. Endangered Hawaiian Stills have been, in the past, and are likely in the future to be killed through aircraft landing and taking off at Kahului Airport. This constitutes a significant adverse impact upon wildlife. The DEIS does not adequately reconcile these interests. A Biological Opinion

must be prepared to address these issues. There has been no study of feasible and prudent alternatives. Nor has it been established that all reasonable steps have been taken to minimize adverse impacts.

Section 3.11 Alien Species

We hereby adopt and incorporate by reference the comments which have been submitted by and on behalf of Haleakala National Park, Jeffrey Parker, Gregory Westcott and Masako Westcott on these issues.

Section 3.12 Wetlands

In addition to Kanaha Pond, several other wetlands exist on airport property which meet Army Corps standards for wetlands. DOT-AIR has been and apparently continues to discharge pollutants through runoff from the airport into these wetlands. The DEIS recognizes that these wetlands cannot be used for drainage; however a simple review of the drainage plans presented indicates that DOT-AIR is proposing to continue this practice. This constitutes a significant adverse impact upon natural resources. Feasible and prudent alternatives obviously exist; however DOT-AIR has not revised its drainage plans so that airport runoff will not be discharged into these wetland areas.

Section 3.13 Hydrology, flood plain management and drainage See §3.4 above with respect to drainage.

Section 3.14 Coastal Zone Management Program

This project is inconsistent with the objectives and policies of the Federal and State Coastal Zone Management Programs. It will cause significant adverse drainage impacts upon near shore waters. It does not protect nearby coastal ecosystems, including the Kanaha Pond Wildlife Sanctuary. Its noise impacts are a significant adverse impact to recreational uses in the area. See also Section 3.4 above.

Section 3.17 Farm land See §3.3 above.

Section 3.22.1 Water supply

Alien species introductions also may have a significant adverse impact upon water supply. Much of the water supplied on this island arises in watershed areas on the flanks of Haleakala and the West Maui Mountains. Currently, this supply is enhanced by mosses within the watershed areas and by multiple tiered canopies in the forests in the watershed areas. Alien species introductions could adversely affect these mosses and the canopies. *Miconia* infestation in Tahiti had just this effect: it destroyed the native eco-system and caused massive erosion. The DEIS should be rewritten to discuss these, among other, island-wide impacts of increased number of alien species introductions.

SECTION 4.0 ALTERNATIVES TO THE PROPOSED PROJECT

The study of project alternatives is intended by NEPA and HEPA to be the "linchpin" of environmental analysis. Here, feasible and prudent alternatives are to be rigorously explored.

HEPA states that "any known alternatives" shall be addressed in the DEIS, even if more costly. H.A.R. §11-200-17(f). HEPA further states:

A rigorous exploration and objective evaluation of the environmental impacts of all reasonable alternative actions, particularly those that might enhance environmental quality or avoid or reduce some or all of the adverse environmental benefits, costs, and risks shall be included in the agency review process in order not to prematurely foreclose options which might enhance environmental quality or have less detrimental effects.

In each case, the analysis shall be sufficiently detailed to allow the comparative evaluation of the environmental benefits, costs, risks of the proposed action and each reasonable alternative.

See H.A.R. §11-200-17(f). The analysis of alternatives in the DEIS is inadequate and must be rewritten. There are several, important general flaws in the study of alternatives which are addressed below:

1. Failure to address reasonable alternatives

The alternatives selected for study present several different runway lengths, the parallel runway, alternative locations for general aviation and helicopters and minimal differences in siting. The alternatives which were fashioned were not designed to address the real issues which have been raised.

a. The alternative of one central international airport vs. multiple international airports

One alternative which should have been studied is whether or not there should be an international airport on the island of Maui. With only one international airport located in Honolulu, all alien species introductions from international flights could be funneled through a single airport and all efforts and funds to detect and intercept alien species could be focused there. In addition, the urban environs surrounding Honolulu International Airport make it more likely that alien species introductions can be avoided. As has been stated on numerous occasions, the Kahului Airport environs, including the proximity of Kanaha Pond Wildlife Sanctuary and agricultural lands, are a hospitable environment for alien species introductions. The environmental benefits and the economic costs of the alternative of maintaining only one international airport, located in Honolulu should have been addressed.

b. Parallel runway vs. general aviation reliever airport
Another important alternative which was not addressed was a weighing of the costs and benefits of constructing a general aviation reliever airport

elsewhere and the construction of a parallel runway at Kahului Airport. Alternative 1 in the DEIS purported to do this; however this alternative was fashioned so that there would not be any lengthening of Runway 2-20. Ultimately, this alternative was rejected for reasons which had nothing to do with the costs and benefits of a general reliever airport versus the costs and benefits of a parallel runway.

The General Aviation Site Selection Study is attached to the DEIS as Appendix R. It acknowledges that as airfield capacity is reached at the Kahului Airport there are only two options available to expand this capacity: (a) building a new general aviation airport elsewhere or (b) constructing a third (parallel) runway at the Kahului Airport. This is an extremely important decision because it is widely accepted that the construction of the parallel runway will impose additional, intolerable significant adverse aviation noise impacts upon the Sprecklesville community.

The General Aviation Site Selection Study is not an environmental analysis of the various sites proposed. Appendix R is only Volume 1. The environmental analysis is to take place in Volume 3, which has not been prepared yet. Nevertheless, the Site Selection Study indicates that there are viable, alternative sites for a general aviation reliever airport, the total costs for which would not exceed 54 million dollars and for which there are no significant environmental impacts, including noise impacts. The FAA issued a letter dated August 25, 1995 determining that there would be no aeronautical or air space conflicts between the Kahului Airport and the proposed general aviation facilities, if certain minimal, reasonable conditions were implemented. The study also found that by removing general aviation operations from the Kahului Airport, the Kahului Airport could be operated in a safer fashion.

The environmental benefits and costs of the parallel runway have not yet been addressed. There has been no rigorous exploration and objective evaluation of these two alternatives. There has been no detailed analysis which could allow the comparative evaluation of the environmental benefits, costs and risks of each of these alternatives. There is certainly no basis for finding that no feasible and prudent alternative exists to the parallel runway.

The General Aviation Study states on p. 9-68 that the construction of a general aviation reliever airport would defer the need to construct a parallel runway for 25 years, presumably beyond 2010, or until 2035. This alternative certainly provides significant benefits which warranted a more rigorous evaluation in the alternatives section of the DEIS.

c. A runway extension to less than 9,600 feet and a general reliever airport elsewhere

We believe that the runway extension to less than 9,600 feet -- or no runway extension, and the location of a general aviation facility elsewhere is a reasonable alternative that might enhance environmental quality and reduce some of the adverse impacts resulting from the extension of Runway 2-20 to 9,600 feet and the construction of a parallel runway. At a minimum, it would

See Cont 10-6

diminish the increased threat of alien species introduction, prevent the imposition of even greater significant adverse noise impacts upon Sprecklesville residents and make operations at the Kahului Airport safer. This is an alternative which could meet the objective of providing greater airfield capacity. It is a "known alternative" which should have been rigorously explored.

d. Alternatives which would add to the margin of safety
To the extent that some proponents of the expansion project have claimed that Runway 2-20 should be extended to 9,600 feet and that a parallel runway should be constructed that is 8,500 feet long for safety purposes, the DEIS should have rigorously explored reasonable alternative actions which could have brought an additional margin of safety, without causing the adverse impacts that will result from the extension of the Runway to 9,600 feet and the construction of the parallel runway.

e. Exporting agricultural produce
Some proponents of the Kahului Airport project have supported the expansion on the basis that there needs to be an increased ability to export agricultural produce grown on this island. There should have been a rigorous exploration of all reasonable alternative actions which could be implemented and increase in the ability to export Maui produce, and would not result in the adverse impacts directly caused by the runway lengthening and the construction of the parallel runway.

f. Non-operational vs. operational noise mitigation measures

One purpose of processing the Part 150 Noise Compatibility Study concurrently with the DEIS was to assure that there would be a rigorous exploration of the environmental costs and benefits resulting from the implementation of operational and non-operational noise mitigation measures. The DEIS should be rewritten to include this analysis.

The AIA, §4(f) of the Transportation Act and the Endangered Species Act all require an analysis of feasible and prudent alternatives when significant environmental impacts are encountered. The DEIS should be rewritten to include this analysis.

2. Unreasonable rejection of alternatives explored
All of the alternatives, except for the preferred alternative, were rejected on extremely narrow grounds; namely that any runway length less than 9,600 feet:

... is not long enough to provide for direct, non-stop flights of Class D (DC10 and L-1011) aircraft to all visitor markets, including midwest and east coast domestic markets, and potential future and international destinations.

DOT-AIR's apparent position is that the primary purpose of the Kahului Airport expansion project is to construct an international airport on Maui with

a runway length (9,600 feet) which will facilitate international airport operations. One of the decisive deficiencies of this position is that there can be no justification for the failure to address the impacts of international flight operations which will be facilitated once Runway 2-20 is extended to 9,600 feet in Phase I of this project.

Alternatives cannot be rejected solely because they do not allow international flight operations. They can only be rejected based upon an analysis which is detailed enough to allow the comparative evaluation of the environmental benefits, costs and risks of the proposed action. The DEIS must be rewritten to include this kind of analysis.

The analysis of alternatives in the DEIS is too facile to comply with NEPA or HEPA. There has been no comparative analysis of environmental risks and costs between each reasonable alternative and the preferred alternative. It is not adequate to simply state that the environmental impacts for each alternative are the same for the preferred alternative "unless otherwise noted."

SECTION 5.0 CUMULATIVE IMPACTS

The DEIS admits, on p. 6-1, that the lengthening of Runway 2-20 to 9,600 feet could have growth-inducing impacts:

A lengthened runway could potentially induce growth at Kahului Airport because such a runway would allow for direct overseas flights from Maui to domestic and international destinations presently beyond the range of aircraft operating from the existing 7,000 foot long runway.

The DEIS claims that the extent of this growth inducement for domestic operations would be an increase by 3-4 percent. The DEIS further admits that the extent of this growth inducement for international flights would be between 11 and 21 percent. The Governor of the State of Hawaii has stated that three flights per week from Japan will bring 48,000 new tourists per year to the Big Island.

The intended destinations for international flights are clearly from Asian countries, primarily Japan, but also including Korea, Taiwan, Hong Kong and Malaysia. The Bank of Hawaii's Economic Report dated April, 1996 establishes that it is this Asian market that will be targeted with the extension of the runway to 9,600 feet. That report states:

Non-stop flights from Japan to Keahole Airport in Kona on the Big Island begin in 1996. Domestic airlines fly to the neighbor islands from North America but require fueling in Honolulu to return to the mainland because neighbor island runways have been too short to allow for fully-loaded and fully fueled takeoffs. The new service to Kona, where Keahole's runways have been lengthened, will be the first regularly scheduled passenger service non-stop

from Japan and will open an airfreight channel as well. Although the terminal at Kahului Airport on Maui was greatly expanded several years ago, the Maui community has been ambivalent about lengthening its runway. So Kona will be the test case to see if direct neighbor island access from Asia unlocks demand in a market still predominantly oriented towards Oahu.

The DEIS admits that the internationalization of the Kahului Airport will add 511,000 visitors per year. The study of the impacts of this addition cannot be deferred. These growth impacts must be addressed before Runway 2-20 is extended to 9,600 feet.

SECTION 6 GROWTH INDUCING FACTS

The DEIS has employed two contradictory strategies or theories with respect to growth inducement. Theory #1 is that runway extensions do not induce growth. Theory #2 is that runway extensions do induce growth. The DEIS claims that a "sensitivity analysis" has been performed to assess the significance of these impacts.

This sensitivity analysis is totally flawed. The analysis applies Theory #2 in suggesting what kinds of impacts might be expected, but when it comes time to perform the impact analysis and to fashion mitigation measures, the DEIS reverts back to Theory #1 and concludes that there will be no significant adverse impacts and no mitigation measures are necessary because no growth inducement will occur anyway. The employment of this methodology undermined the whole purpose of conducting the sensitivity analysis. The DEIS should be rewritten applying Theory #2 to the impact analysis and development of mitigation measures for the significant adverse impacts resulting from the induced growth.

SECTION 7 OTHER NEPA AND HEPA SECTIONS

The analyses of (1) the relationship between short term uses and maintenance of long-term productivity, (2) significant unavoidable impacts, (3) irreversible and irretrievable commitments of resources, (4) effects found not to be significant and (5) off-setting considerations of governmental policies are all inadequate because they are undermined by the many NEPA and HEPA violations which have been discussed earlier in this comment letter.

Section 7.6 Conformance with state and county plans, goals and policies

It is not possible to conclude that this project is reasonably consistent with plans of public agencies authorized by the state in which the airport is located to plan for the development of the area surrounding the airport. The DEIS admits that the proposed project is inconsistent with the current agricultural designation of lands by the State Land Use Commission for areas proposed to be used for the extended runway and the parallel runway.

The DEIS admits that the expansion project is inconsistent with the existing Waialuku-Kahului Community Plan and that an amendment of this Plan will be necessary to achieve consistency.

The DEIS admits that the proposed airport expansion project is inconsistent with the existing zoning for the area and that a change in zoning will need to be obtained in order to achieve consistency.

There is no basis for any determination that this project is reasonably consistent with any of these important plans. Evidence directly to the contrary is already in the record.

There are obvious and important objectives and policies contained with the Hawaii State Plan, the Coastal Zone Management Act and the General Plan which are inconsistent with the project as proposed in the DEIS.

SECTION 8 OTHER RELATED ISSUES

Section 8.1 Alahao Street, Stable Road

There has been no analysis of the environmental costs and benefits of connecting this road and opening it to the public and connecting these roads and prohibiting general public use.

Section 8.2 Analysis of International Flight Operations

This subsection does not even pretend to be a complete, full and rigorous study of the environmental impacts cause by international flight operations. It expressly declines to study these impacts, because "no permanent FIS facility is planned."

Conclusion

It will be insufficient to simply respond to the comments received on the DEIS in the same fashion in which the DEIS has been prepared -- by denying and/or ignoring the environmental impacts that will be caused by the proposed projects. The inadequacies of the DEIS are so severe that the document must be withdrawn, rewritten, republished as a DEIS, and public review recommended.

We urge the Federal Aviation Administration and Federal Aviation Administrator David Hinson not to approve the new Airport Layout Plan, the new Master Plan or any grant application for project funds for the expansion of Kahului Airport because, based upon a full and complete review of the record which is available, it is not possible to render a finding that the criteria for approval set out in §509(b)(1) - (9) of the AIA have been met.

We trust that you will take seriously your responsibility to enforce the environmental laws of our Nation and our State, and refuse to accept or approve this document until it has been adequately prepared to serve its intended purpose.

End of IDH-7

See Comment IDH-6

See Comment IDH-9

End of IDH-9

See Comment IDH-10



STATE OF HAWAII
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ADDRESS HERE TO
AIR-EN
97.1065

August 20, 1997

Thank you for the opportunity to comment on the DEIS.

Sincerely yours,

Isaac Hall DMH

Isaac Hall
For the Sierra Club, Mary Evanson,
Maui Air Traffic Association, Steven Pitt,
James Bendon, The National Audubon
Society, Dana Naone Hall and
Maui Malama Pono, Inc.

Dana Naone Hall

Dana Naone Hall
For Hui Alanui o Makena

IH/JP

cc: Office of Environmental Quality Control
220 S. King St., 4th floor
Honolulu HI 96813

Mr. Isaac Davis Hall
2087 Wells Street
Mailuku, Hawaii 96793

Dear Mr. Hall:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comments on the Draft EIS for the proposed Kahului Airport Improvements which was submitted on behalf of the Sierra Club, Mary Evanson, Maui Air Traffic Association, Steven Pitt, James Bendon, the National Audubon Society, Hui Alanui o Makena, Dana Naone Hall and Maui Malama Pono, Inc. This letter is in response to your comment letter of May 23, 1996 with substituted pages submitted with your letter of May 24, 1996 and June 21, 1996. Your letter is attached for reference.

COMMENT IDH-1 - Compliance with Hawaii Revised Statutes, Chapter 343 (HEPA) and the National Environmental Policy Act (NEPA)

This comment presents the commentator's opinions regarding the HEPA and NEPA compliance. We disagree with the opinions of the commentator. However, the comment will be part of the record and made available to the decision-makers prior to a final decision on the Proposed Project.

COMMENT IDH-2 - Form, Style and Content Requirements

This comment refers to the form, style and content requirements specified by state law. The recommendations in HEPA and NEPA were considered when preparing the Draft EIS. We disagree with the commentator's statement that the Draft EIS is "purposely misleading" and is "a self-serving recitation of benefits and a rationalization of the proposed action."

The environmental analysis was performed in an objective manner consistent with the requirements of NEPA and NEPA. Nevertheless, the commentator's opinions will be part of the record and made available to the decision-makers prior to a final decision on the Proposed Project.

The Draft EIS has looked at the entire Proposed Project and has not been illegally segmented as stated by the commentator. The various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and long-term (Phase 3). The categorization of the projects is based on the existing and forecast demand. Obviously, the Phase 1 improvements are needed to meet existing demands and deficiencies, and the Phase 2 and Phase 3 projects to meet the aviation demands anticipated for that time frame. At this point in time, it is certain that the fuel pipeline may be a project beyond the Year 2010 planning horizon. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. As stated in Section 1.5.1, these long-range projects are analyzed in this Draft EIS to determine the individual and cumulative impacts as required by HRS Chapter 343 and NEPA.

However, given that the construction of these projects will occur, if at all, after the Year 2006, and, more likely near or after the Year 2016, the Draft EIS could provide an impact analysis for foreseeable impacts both individually and cumulatively. At this point in time, any more detailed analysis would be highly speculative and prone to error, for it is very likely that each of these long-term projects will undergo substantial changes over the next ten to fifteen years. For example, the scope, size, location and timing of the projects may be altered should air travel to and from Maui evolve and take shape differently than originally anticipated.

If and when the parallel runway, transient apron, helicopter facilities and fuel pipeline are defined in detail and submitted as projects to be implemented, each will be subjected to a more in-depth environmental review as required by state and federal law, e.g., Environmental Assessments, Findings Of No Significant Impacts (FONSI) or Environmental Impact Statements.

The fact that the Draft EIS cannot provide a comprehensive environmental review of the long-term projects does not mean that the Draft EIS is deficient. Under NEPA, multi-stage projects such as this one can be "segmented" so long as the portions of the project that are fully analyzed in the Draft EIS meet the

following criteria: (i) they have substantial independent utility, (ii) they do not foreclose the opportunity to consider alternatives to the more speculative, long-term projects that will be studied later, and (iii) they do not irretrievably commit federal funds for those projects.

The short-term (Phase 1) and medium-term (Phase 2) projects proposed for Kahului Airport and analyzed in the Draft EIS meet these three criteria. Each has substantial and independent utility. In fact, even if the Phase 3 projects were never implemented, the Phase 1 and Phase 2 projects would still be necessary and would still serve their intended purposes. The Phase 1 and Phase 2 projects also do not foreclose the opportunity to consider alternatives to the Phase 3 project proposals.

It is anticipated that the design, size, timing, location and facilities and fuel pipeline may change in the next ten to fifteen years. Because the Phase 1 and Phase 2 projects possess their own, self-contained utility, they in no way prevent the consideration of alternatives to the Phase 3 projects.

Lastly, the Phase 1 and Phase 2 projects do not irretrievably commit federal or state funds for the Phase 3 projects. Indeed, one of the reasons that the Phase 3 projects are speculative is that federal funding for such airport improvements is not and cannot be guaranteed decades into the future. Because the Phase 1 and Phase 2 projects are independent of the Phase 3 projects, funding for the former does not commit funding for the latter.

The following information is provided to further clarify this issue.

- The transient apron will be constructed, if at all, after the Year 2006. The parallel runway, long-term relocation of the helicopters, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks will be constructed, if at all, after the Year 2010.
- The Phase 1 and Phase 2 projects have utility apart from and independent of the parallel runway, transient apron, long-term relocation of the helicopters and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. Similarly, these Phase 3 projects have independent utility and are not reliant on the implementation of the Phase 1 and Phase 2 projects.

- If and when the time approaches that the parallel runway is required to prevent substantial deterioration of service at Kahului Airport, the Federal Aviation Administration (FAA) will prepare the required environmental documentation pursuant to applicable federal law addressing the proposed runway's environmental effects. Currently, it is anticipated that Kahului Airport will not require the parallel runway, if at all, until the year 2010. Environmental documentation prepared closer to that time when the parallel runway would actually be constructed ensures that the environmental analysis will be more accurate and relevant.
- In addition, the State of Hawaii, pursuant to HRS Chapter 343, will prepare its own environmental documents for the long-term, Phase 3 projects at a later date closer to the actual implementation of the project. These documents will be either supplemental to this Draft EIS or independent studies. Again deferring study of the future projects to a later date increases the accuracy of the environmental analysis. It is also very likely that this Draft EIS, prepared in 1996, will be considered out of date and unreliable in the year 2010, thus necessitating the preparation of a new environmental document at that time. Especially, due to the high probability that the long-range actions will change in size, scope, location, or timing.
- According to Council on Environmental Quality (CEQ) regulation 1508.28(b), tiering should be used to, "help the lead agency focus on issues that are ripe for decision and exclude from consideration issues already decided or not yet ripe." [emphasis added] Therefore, the Draft EIS focused on the short-term (Phase 1) and medium-term (Phase 2) projects, and deferred detailed analysis of the Phase 3 projects until a later date when they could be defined with greater precision and when the environmental effects could be determined more reliably and accurately.
- Due to public concern and as required by the Court-ordered stipulation, the Draft EIS also analyzes the impacts of realigning, widening and improving Alahao Street and extending it to the northeast through traffic along the coastal side of Kahului Airport, and international flight operations including permanent and temporary (interim) international arrival facilities. Note, however, that such international arrival facilities are not part of the Proposed Project but are considered in Section 5.0 as a cumulative impacts.

The potential impacts of the Proposed Project to the "introduction rate" of alien species was analyzed in the Draft EIS (see Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10). Also, the responses to comments will be performed to meet both NEPA and HEPA requirements.

COMMENT IDH-3 - Section 1.0 Introduction and Summary

We respectfully disagree with the opinion of the commentator that the assumptions made in the Draft EIS are contradictory or unreasonable. However, without any information regarding these assumptions, no further response can be made. The comment, however, will be part of the record and made available to the decision makers prior to a final decision on the Proposed Project. An index (table of contents) will be provided for each volume.

Project Summary and History

The commentator has not provided any information which indicates how the project summary and history are inaccurate. Therefore, no further response can be made. In addition, the commentator fails to indicate the manner in which the project summary and history "violate the Court Orders". No further response can be made. We respectfully disagree with the opinions of the commentator. The discussion of the project summary and history is complete and accurate and in compliance with the Court Orders.

The Scoping Process

Since 1990, the State of Hawaii, Department of Transportation (DOT), Airports Division, and FAA have undertaken a comprehensive and thorough community outreach program for the State EIS, the Airport Master Plan and this EIS designed expressly to inform the public, stimulate public discussion regarding the proposed improvement projects at Kahului Airport, and receive public comments regarding the project. The community outreach program included public information meetings, technical advisory meetings, meeting announcements, public notices and briefings. In addition, formal public meetings have been held throughout the planning process, including two scoping meetings and a public hearing for this EIS process. In addition, the Notice of Preparation for the Draft EIS (HRS Chapter 343) that described the proposed project was mailed to interested parties, presented and discussed publicly.

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travel industry, businesses within the airport environs, representatives of the aviation community and technical experts as referenced in the individual appendices.

Time for review

The time frame for review was 45 days as required under the Council on Environmental Quality Control. Further, the time of review was lengthened by an additional 30 days to June 22, 1996 at the request of the public. This extension was published in the Office of Environmental Quality Control bulletin of June 8, 1997 and as a FAA press release of June 11, 1996.

Areas of Controversy/Issues to be Resolved

The commentator fails to provide any information regarding why it believes this section of the Draft EIS is inadequate. Further response cannot be made at this time.

Incorporation of Studies and Other Documents

The HDOT, Airports Division records indicate that the commentator has received a copy of the "Update of Hawaii Aviation Demand Forecast". However in regards to your comment, an EIS may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public. Incorporation by reference is a procedure for reducing the size of EISs and is particularly appropriate for long, descriptive, or technical materials. When a document is incorporated by reference in an EIS, the lead agency must make the document available for inspection at its offices.

Neither NEPA nor NEPA require that incorporated materials be circulated for public review with the EIS, nor do they require circulation or public availability of subsidiary documents that are incorporated in a document that is then incorporated into the EIS. However, at the request of the commentator, the "Update of Aviation Demand Forecast", will be included as an Appendix to the Final EIS.

Update of Hawaii Aviation Demand Forecast

The methodology, assumptions and conclusions related to the development of the aviation demand forecasts are described in Appendix N. The Update of Hawaii Aviation Demand Forecasts, October 1994 forms the basis of the forecast analysis prepared in Appendix N of the Draft EIS. A discussion of the aviation

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During the entire process, the HDOT, Airports Division and FAA made extensive efforts to provide communities, public agencies, special interest groups and residents with the opportunity and tools to participate in the environmental review process.

Community input has been incorporated throughout the environmental review process and public comments have helped to shape the Draft EIS.

The Scoping process was described in Section 1.3 with the discussion on the public coordination presented in Section 1.3.2 and Section 10.0 of the EIS. Also, the interviewees for the various technical studies are presented in the corresponding Appendices. In addition, the public involvement for the Kahului Airport Draft EIS was intensive and described in Section 10.0 and the individuals and agencies which are listed in Section 10.3 are "Consulting Parties" as defined in HRS Chapter 343. These agencies and individuals that are "Consulting Parties" have had various opportunities to express their concerns during the EIS process.

With respect to the statement that the National Park Service (NPS) personnel at Haleakala National Park was not consulted, this statement is incorrect. Although the NPS was not "formally designated" as a "cooperating agency" for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed and provided comments on the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies. In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS was a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

In short, neither the commentator nor any other member of the public, including the "Consulting Parties" and non-governmental agencies were deprived of the opportunity to provide meaningful comments to an environmental issue raised in the Draft EIS. Nevertheless, the commentator's opinions will be part of the record and made available to the decision-makers prior to a final decision on the Proposed Project. In addition, the technical studies also include consultation with representatives from the

forecasts from the Update of Hawaii Aviation Demand Forecasts, and other government forecasts is included in Appendix E.

The HDOF, Airports Division would implement the specific elements of the Proposed Project as these are needed for various reasons such as aviation demand, safety or operational considerations. For this reason, the Proposed Project, "the Recommended Master Plan" has been phased for implementation in different time frames, that are based on the forecast aviation demands. This reasoning has been clearly stated in the Master Plan and Section 2.5 of the Draft EIS. This implementation phasing allows the HDOF, Airports Division to spend its funds based on actual need and as dictated by the actual aviation demand, rather than building facilities which may not be needed or are too large for the actual demand (see Section 2.5 of the Draft EIS). However, most of the Phase 1 projects are related to existing aviation demand needs and existing airport deficiencies, as described in Section 2.3 of the Draft EIS and are less dependent on the future aviation demand.

As stated in Appendix E and N of the Draft EIS, the international (non-U.S.) passengers are approximately 30 percent of the total visitors to Maui. The eastbound international visitors account for approximately 21 percent of the total (domestic and international) visitors to Maui. The marketing of Maui to "new" visitors or tourist destination, can be performed with or without the Proposed Project. Aircraft used by international air carriers can presently land on Runway 2-20 at Kahului Airport from any worldwide destination. In fact, if Japan Airlines (JAL) would like to exercise their current bilateral agreement, JAL can presently land and depart B747 aircraft on Runway 2-20 at Kahului Airport. There have been instances in the past in which B747 have landed with foreign visitors to Maui. The marketing of visitors will be a business decision by the tourism industry and will be dependent on their business goals and ideas.

The Draft EIS does discuss the change in interisland service in Section 3.5, 3.6, 4.0 and 5.0 and Appendices E and N. The interisland market will be actually larger than it is today. In fact, as stated in Section 4.0 of the Draft EIS the interisland airline market could be more competitive and much more volatile without the Proposed Project, as the forecast interisland market base of the No-Action alternative will be larger and more conducive to new challengers in the interisland market.

The Socio-Economic Assessment Impact Report (Appendix E) refers to "a developing Maui Only Japanese/ Eastbound Market," and not

"to developing a Maui-Only Japanese/Eastbound Market" as misstated by the commentator. This has been explained in detail in Appendix E, and refers to the historical increase in the number of Japanese/Eastbound visitors that are visiting only Maui, i.e. not visiting any other island in the State during their visit to Hawaii.

The future military aircraft operations, by airport, has been provided by U.S. CINCPAC and will be same with or without the Proposed Project. Their operations were assumed to be similar in nature to the current operations. The military aircraft were included in the noise analysis of the Draft EIS. The number of military flights will not change due to the Proposed Project. As for the alien species issue see Comment IDH-5, below. The impact on the introduction rate of "alien species" from military traffic will remain the same with or without the Proposed Project.

Nature of Forecast Demand too Vague to Allow Environmental Review

- The 2000 aircraft and passenger breakdown is presented in Appendix N and was used as applicable in the Draft EIS analysis.
 - The types of aircraft being used and identification of whether the aircraft are Stage 2 or Stage 3.
- The differentiation of Stage 2 or Stage 3 aircraft was provided in connection with the noise analysis presented in Section 3.2, Appendix C and Appendix O. The Noise Compatibility Program (NCP) (Appendix O), was concurrently completed with the EIS. This NCP provides an analysis of the potential noise impacts related to different runway lengths for the next 5 years (1998 Noise Exposure Map). The Noise Exposure Map for 1998 is shown in Appendix O of the Draft EIS and will be included in Section 3.2 of the Final EIS.

- Segregation of nighttime aircraft operations

Nighttime noise impacts were taken into account in the noise analysis provided in Section 3.2 of the Draft EIS. Specifically, the DNL descriptor describes cumulative noise exposure for an annual average day of aircraft operations, including a penalty of 10 db for operations occurring during the nighttime hours (10:00 p.m. - 7:00 a.m.). As a practical matter, each aircraft noise event occurring during the nighttime hours is treated as if ten (10) aircraft noise events had occurred. The ten (10) db penalty is inherent to the definition of DNL, compensates for the

intrusiveness of night flights. However, the actual noise level would be the same for an aircraft whether it flies during the day or night. Therefore, if the ten (10) db penalty was removed the noise exposure would be less. Furthermore, if the aircraft operations (day versus night) were segregated and analyzed separately as the commentator suggests, the noise impacts for each segmented analysis would be less than the noise impact from the total analysis, as presented in the Draft EIS.

The Draft EIS, does show the change in the actual noise levels for various aircraft using the single event noise exposure metric (SEL). The SEL values would be the same for both day and night aircraft operations, and the analysis shows the differences with and without the Proposed Project. From these comparisons, the Proposed Project would have insignificant impact, and in some cases positive impacts on the noise sensitive areas within the Spreckelsville community.

The commentator makes an assumption that a forecast increase in aircraft operations will increase the number of night flights. There is no rationale given for this assumption as all domestic overseas flights currently depart during the daylight or early evening hours. The vast majority of nighttime aircraft operations are due to the night cargo flights by interisland carriers or the early morning interisland passenger flights. Due to existing operational restrictions in Japan and due to the current operating hours at Honolulu International Airport, it is expected that the international flights will arrive and depart during the day hours (7:00 a.m. and 10:00 p.m.).

• International Flight Operations

The issue of International Flight Operations is discussed in Section 6.0, and Section 8.2 of the Draft EIS. Specific impact analysis for international flight operations were presented in Appendices C, E, U, and M of the Draft EIS. The commentator is correct in stating that international flight operations at the airport depends upon many variables including pre-clearance, open skies, and bilateral agreements. Specifically, international service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in

limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed for a limited time and with limited service without lengthening the runway or increasing the pavement strength at the airport. JAL could initiate service on the existing runway on a one-stop basis per the bilateral with the one-stop being at Honolulu International Airport, similar to the domestic overseas aircraft presently using Kahului Airport. Also, based on the runway length analysis in Appendix N, the JAL 747 series aircraft could fly directly to Tokyo on the existing runway with almost a full load of passengers and a substantial cargo penalty.

However, interim international arrival facilities may have to be installed if JAL or other scheduled international flights arrive at Kahului Airport, to provide the required inspection by the Federal Inspection Services (FIS). The international flights are described as a cumulative issue in Section 5.1.7. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

As the permanent international facilities are not part of the Proposed Project, but may happen in the future, the impacts were analyzed as cumulative impacts and in compliance with the Court Ordered stipulation in the Draft EIS. Although the forecasts, which are provided in five year increments, shows international flights occurring during 2010 time frame, as stated above, JAL may initiate one-stop service to Maui in the near future and it is JAL's decision.

The commentator states that it is a deceptive practice to count international passengers not using a permanent international facilities have been shown as domestic passengers. We disagree with this statement, as only those international passengers which have been pre-cleared by the FIS or do not need to be processed in Kahului by the FIS are shown as domestic passengers.

International passengers which need to be processed by the FIS are or will be counted as international passengers in the forecast. In general, these international passengers are separated in the forecast to allow for the sizing of international facilities at the airport.

The analysis for the Draft EIS indicates that a 8,500 foot long runway would be needed to accommodate internationalization, meaning "more flights, more often, and to and from more foreign destinations." However in the runway analysis performed for the Draft EIS, the B747 series aircraft can conduct flights to Tokyo with the existing 7,000' runway with nearly a full load of passengers and a substantial cargo penalty. Therefore, it is possible for JAL to conduct a limited number of direct international flight operations at Kahului Airport without the Proposed Project.

Summary of Land Use Compatibility and Permits and Approvals

1. FAA Approval of New Approval of New Airport Layout Plan

The commentator is incorrect in his statement regarding the current Airport Layout Plan in effect. The current Airport Layout Plan is the 1993 Airport Layout Plan that the commentator labels as the "proposed, updated Airport Layout Plan" or "new Airport Layout Plan," and was a product of the 1993 Kahului Airport Master Plan. This Airport Layout Plan has been approved, "with conditions" by the FAA as of August 20, 1993. The conditional approval was granted to insure that environmental analysis will be completed for certain projects prior to implementation of the projects. These projects include: (i) extension and strengthening Runway 2-20, (ii) Relocate the ILS and MALSR on Runway 2, and (iii) Acquire land for Runway 2 approach protection and the MALSR.

The commentator should be aware that the approval of the Airport Layout Plan does not constitute a commitment by the FAA to provide financial assistance to implement the proposed development nor include an evaluation of actual construction or alteration which requires notice under Federal Aviation Regulations Parts 77 and 157. Inclusion of the project development on the Airport Layout Plan signifies a concurrence with current standards for safety, utility, and efficiency. Actual facility development will be governed by design standards applicable at the time the development is undertaken.

In addition, the Airport Layout Plan is a record of aeronautical requirements, and is referred to by the FAA in its review and findings on proposals involving the development of other nearby airports and object which may affect the navigable airspace. It can also serve as a public document which is a record of aeronautical requirements, both present and future, and assist the public as a reference for land use proposals and community planning. The Airport Layout Plan is frequently updated to provide a current record of the facilities on the airport, and will be updated in the future as necessary.

The current ALP on file reflects the Recommended Master Plan, that has become the Proposed Project. This EIS will serve as the environmental document for the items listed above, in the August 1993 approval letter. There is no requirement for the Airport Layout Plan to be part of the Draft EIS. As stated in the Draft EIS, future environmental analysis will be completed prior to undertaking of the future projects, and is consistent with the approval process for the new projects identified on an Airport Layout Plan.

2. FAA approval of the EIS and release of federal funds

The commentator has asked that a full discussion of the Sections 509(b)(1)-(9) of the Airport and Airway Improvement Act of 1982 (AIA) be included in the Draft EIS. These sections of the AIA detail the approval requirements of the Project Grant Applications for the Secretary of Transportation and have no relevance in determining the impact of the Proposed Project to the environment. However, these sections are attached to this letter for your use and your comments are attached to this response letter will be made available to the decision-makers prior to a final decision on this EIS.

The commentator is correct in stating that the roadway improvements will cause a short-term traffic impact on the roadway system within the Airport environs, and it is recognized in various Sections of the Draft EIS including Section 7.1. Also, as stated in Section 3.22.8.6, the closure of Haleakala Highway has been previously mitigated by the widening of Hana Highway. The impacts on noise, air pollution and other environmental impact categories are discussed in the appropriate subsections of Section 3.0 of the Draft EIS. As requested, additional discussion of traffic congestion during construction will be included in the Final EIS in Section 3.22.8.6.

The commentator does not describe the "alternative traffic improvements" which should be studied. However, the traffic analysis in Section 3.22.8.5, discusses the impact of the new roadway between Upcountry Maui and Kihei and Section 4.6 includes a discussion of Transportation Demand Management alternatives. In addition, it is apparent in the traffic analysis summarized in Section 4.2-22.1 and presented in detail in Appendices M and P that the proposed widening of Dairy Road, that is accounted for in the future roadway system, will not be able to accommodate the forecast increase in the overall automobile traffic in the airport environs, without the Proposed Project.

3. Federal Highway Administration approval of the EIS and release of federal funds for the proposed airport access road

The Federal Highway Administration through HDOT, Highways Division was considered as a funding source for the construction of the Proposed Airport Access Road. However, that Federal Highway Administration funding will not be currently pursued for the Airport Access Roadway. Regardless of the funding, the proposed Airport Access Roadway is an integral part of the Recommended Airport Master Plan and has been addressed in this manner in the Draft Environmental Impact Statement.

COMMENT IDH-4 - Project Description

Purpose and needs of the Proposed Project and Statement of Objectives.

The Proposed Project as it relates to the future goals and objectives of the State and County are discussed in Section 7.0 of the Draft EIS.

The Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate

more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

As stated in Section 2.0, further research by the HDOT, Airports Division, Property Management Section, has shown that there are no ceded lands on Kahului Airport.

The commentator suggests that nonstop international flights to Maui would commence upon completion of, or soon after completion, of Runway 2-20's extension to 9,600 feet. The Draft EIS, states that nonstop international flights are occurring at this time. In addition, other nonstop or one stop international flights may occur at any time without the Proposed Project. The aviation demand forecasts indicate that international flight operations are forecast by the year 2010. The issue of international flight operations is discussed in Section 8.2 of the Draft EIS. Please refer to comment IDH-3 above for a response to international flight operations.

Proposed Airfield Developments

The issue of whether the runway lengthening or strengthening project is a valve for picking and choosing domestic and foreign destinations to be served by flights to and from the airport is discussed in Section 6.0 and Appendix E. The analysis shows that the runway lengthening and strengthening will have insignificant growth inducing impacts without internationalization on the number of visitors to Maui, even with direct flights. As stated in Section 2.3.2., the existing Runway 2-20 length and strength is sufficient for aircraft presently arriving and forecast to arrive at the Airport, including heavy jet aircraft typically used by passenger airlines and air cargo carriers.

Although the existing runway pavement and length can support existing and future aircraft arriving at Kahului Airport, the present runway length and strength does impose significant takeoff restrictions on overseas aircraft using the Airport, especially the DC-10 and the L-1011 - two of the most frequently used transoceanic/transcontinental aircraft. These limitations have led to redundant flight operations that are not only economically inefficient, they impose longer travel times on travelers and increase the likelihood of air-to-ground and ground-to-air flight mishaps. In addition, the stopover flights at Honolulu add to the demand at Honolulu International Airport, which is forecast to have long aircraft delays in the near future because of the limited runway capacity. Therefore, direct overseas flights from Kahului would benefit the Statewide Airport

System by removing the stopover flight demand at Honolulu International Airport, thereby delaying Honolulu International Airport's need for additional runway capacity.

By providing additional runway length and a strengthened runway, the Proposed Project will permit the Airport to: (i) better accommodate those air carriers which currently serve destinations outside the State of Hawaii, including mid-west, east coast and future international hubs, (ii) better accommodate future projected increases in passengers and cargo leaving Maui for destinations outside the State of Hawaii, and (iii) improve the efficiency and flexibility of aircraft use at the Airport and within the State.

A summary of the different runway lengths and their limitations on different aircraft are presented in Section 4.3.2 and detailed in Appendix N. In addition, as stated above, the Purpose and Need of the Project is to better accommodate those air carriers serving long-range destinations including East coast and future international hubs.

The runway strengthening project will be designed as an overlay of the existing pavement to accommodate the design aircraft for a given pavement life. As stated in Section 2.2.1, the runway pavement design is based on many factors, such as life cycle analysis, design aircraft gross weight and number of aircraft departures. As the existing pavement can accommodate all aircraft arriving at Kahului, the new pavement design with the runway extension will accommodate all aircraft arriving at Kahului Airport, and will be able to allow for fully-loaded aircraft to depart Kahului.

Project Phasing

The commentator has inadvertently lumped different projects from different phases within the overall project and have called them "phased" projects. However, the projects listed do not necessarily commit the HDOT or FAA to future projects. If one portion of the project is completed, it does not depend on the completion of the following project to be operational. Rather, the Proposed Project provides for the expansion of these facilities to accommodate the forecast growth of aviation demand within the planning period.

Environmental laws and regulations recognize the balancing required of public agencies when evaluating projects. A tenet of these laws and regulations is to elevate the consideration of

environmental damage versus the public benefits of any given project. It is the policy of the State to require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment. These types of decisions are acknowledged and specifically recognized by HDOT, Airports Division, and FAA as part of the responsible decision-making process incumbent upon governmental agencies.

The economic analysis is provided in Sections 3.5 and 3.6, and Appendix E of the Draft EIS. As stated in Appendix E, the fares between Hawaii and the U.S. Mainland are low due to price competition, making it impossible for the airlines to recoup costs, much less pass on new costs to the traveler. However, even if the cost could be placed on the traveler, the cost per passenger for these improvements are in the range of \$0.40 to \$0.50 for overseas passengers and \$0.15 to \$0.20 for interisland passengers.

Also as stated in Section 2.5, the future projects will be completed as necessary funding is available. The funding sources will be from the airport discretionary funds, including landing fees and rental income, federal grants, and airport revenue bonds. All capital costs for aviation-related facilities are assumed to be financed with airport revenue bonds, which are backed solely by the revenues derived from airport operations. No tax revenues will be used to pay the debt service on the airport revenue bonds. In addition, many recent bonds issued by airports nationwide have been insured to protect bondholders (and implicitly the community) in the event of a default. Furthermore, airport operating expenses are projected to be funded from airport operating revenues and therefore will not require taxpayer assistance.

The Proposed Project would be implemented in phases, with facilities being constructed only when passenger forecasts support their development. If the airport chooses to obtain bond financing, HDOT, Airports Division would have to conduct financial analysis to demonstrate the financial feasibility of the airport development. Once the program's financial feasibility has been demonstrated to the investment community and bond rating agencies, bond financing could be obtained. When determining the program's financial feasibility, the strength of the underlying market for aviation services (passenger demand forecasts), would be evaluated as well as the signatory airline's

willingness and ability to pay the projected costs of the Proposed Project.

As the Phase 2 and 3 projects are still a number of years away, approval for design and construction and funding has not been initiated. These projects are not yet ripe for development but may be needed because the forecast aviation demands show an increase in aviation activity. In addition, these projects are included in this EIS to discuss the potential direct and cumulative environmental impacts of these projects. The cost for the relocation of the helicopter operators will be negotiated at the time of relocation (this statement will be added to the EIS).

The cost reduction for the Proposed Project stated by the commentator would occur naturally, if the aviation demand does not require the need for a parallel runway. The HDOT or FAA will not construct these projects until required. The commentator suggests that a flight kitchen is not needed if the Runway is kept under 7,000 feet. This may not be so, because although there is a flight kitchen in Maui to serve the existing overseas flights from Maui to overseas destinations, an on-airport flight kitchen will provide more efficient catering service as aviation demand increases with or without the runway extension. The cost for the Fuel Pipeline and the Bulk fuel facility will be borne by the air carriers and not HDOT, Airports Division or FAA.

Additional Comments on Project Costs and Project Phasing

The Draft EIS did not make the decision on the Phasing of the Proposed Project. The Phasing for the Proposed Project was recommended in the 1993 Master Plan for Kahului Airport. The interim helicopter facility was a later addition, which was given a high priority to be completed due to operational and safety concerns. The non-demand facilities, were phased to allow for a smooth transition and to spread out the costs of the improvements. The change in phasing of the Kanaha Beach Park improvements will not have any impact on the environmental analysis presented in the EIS and therefore, no changes will be made.

The new (full size) Runway Safety Areas for Runway 5-23 will be completed when the runway improvement are performed on that runway. According to FAA records the Runway Safety Area at the Runway 20 end meets current FAA standards, and therefore no work will be performed in the area as part of the Proposed Project.

The issues related to the ATCT were identified in the Master Plan, and during the planning process no future improvements

planned. Operational procedures have been developed to deal with the restricted visibility. There was no action which needs to be analyzed in the current EIS.

The relocation of the VORTAC has been completed and no second relocation is planned. Therefore, no further response is necessary.

The cost of the sound attenuation for highway noise is included in the Draft EIS, Section 3.2.2.4. and does not significantly increase the estimated cost of the Proposed Project. The sound attenuation project for aircraft noise is independent of the EIS as it corrects an existing aircraft noise problem which will not be changed with the Proposed Project. However, the cost of the noise mitigation measures will be included in the EIS and will be completed under the Noise Compatibility Program and as funds are made available (see Section 3.2 of the EIS).

The Kanaha Beach Park expansion was proposed as part of the Proposed Project and has been placed in Phase 2 to be constructed after the runway is extended and the Airport Access Roadway is constructed. The proposed project phasing will allow HDOT-AIR to spread out the expenditures of HDOT-Airports to maintain a balanced cash-flow for the airport system.

The costs included in the Draft EIS are estimated values based on the land values at the time the Master Plan was published. The actual costs for the land acquisition will be determined at the actual time of purchase, by an independent real estate appraiser, to provide a fair and equitable price for the land to be acquired.

COMMENT IDH-5 - Affected Environment, Probable Consequences and Mitigation Measures

Introduction

- Illegal Segmentation

The commentator's argument that the proposed airport improvement projects studied in the EIS have been illegally segmented is not supportable. The project satisfies the HEPA/NEPA requirements regarding reasonably foreseeable future actions, project description, independent utility, and non-commitment to future projects.

As explained in the Draft EIS, and to the commentator on many occasions, the demand related elements of the project is phased to meet existing aviation demand or anticipated forecast aviation demands. This phasing allows the HDOT, Airports Division to spend its funds on an as-needed basis as dictated by the actual aviation demand, rather than building facilities which may not be needed or too large for the actual demand (see Section 2.5 of the Draft EIS).

All phases of the Proposed Project have been treated as a single action for purposes of the analysis and have been addressed, to the extent possible, in the EIS. In addition, the cumulative impacts that may result from the incremental impact of the proposed action when added to other past, present and reasonably future actions have been analyzed in the EIS. These impacts include impacts that may result from individually minor, but collectively significant, actions that take place over time. See Section 5.0 of the Draft EIS.

The environmental analysis related to the ARFF Station and ARFF training facility were provided in separate previous environmental documents as stated in the Draft EIS. At this time, the construction of the ARFF station has been completed and the ARFF training facility is under construction. There will be no cumulatively significant impacts with respect to these projects (See Section 5.1.4 of the EIS).

The EIS addresses long range development projects to the extent possible, including the parallel runway, the relocation of helicopter facilities, the fuel supply pipeline and the transient apron. Unfortunately, at this point in time, any more detailed analysis would be highly speculative and prone to error. Therefore, although the EIS has used its best efforts to disclose all that it reasonably can regarding these potential future projects, some of the specific potential impacts of these projects are too speculative for evaluation at this time. As stated in the EIS, any potential environmental impacts resulting from any of these potential future projects would require NEPA and NEPA analysis prior to implementation. Thus, although the EIS recognizes that these potential projects may result in significant environmental impacts if and when they are implemented, these potential impacts are simply too speculative at this time to require further analysis. Obtaining more detailed useful information than that provided in the EIS is not meaningfully possible at this time. Because there is no reliable data that presently exists (or that can reasonably be obtained) to permit preparation of a meaningful and accurate report on the impact of many of the Phase 3 projects other than the vague

kind of generalities, further analysis is not required at this time.

Therefore, contrary to the commentator's assertions, the EIS has conducted a complete and full environmental review of "all phases of the project." The Phase 3 projects have not been "segmented" from the first two phases of the Project. Rather, in light of the time frame for possible implementation of these projects (the Year 2009-2016) the EIS has recognized that the potentially significant impacts that may result from these projects are simply too speculative for analysis at this time and has acknowledged that further environmental analysis will be required for these projects if and when implementation is proposed.

We respectfully disagree with the commentator's claims that the implementation of Phase 1 and Phase 2 project will somehow "commit" the FAA and HDOT to implementing projects in Phase 3. This statement is simply inaccurate. Each of the Phases has substantial and independent utility. In fact, even if the Phase 3 projects were never implemented the Phase 1 and Phase 2 projects would still be necessary and would still serve their intended purposes. The Phase 1 and Phase 2 projects also do not foreclose the opportunity to consider alternatives to the Phase 3 project proposals.

The Phase 1 and Phase 2 projects do not irrevocably commit federal or state funds for the Phase 3 projects. Indeed, one of the reasons that the Phase 3 projects are speculative is that federal or state funding for such airport improvements is not and cannot be guaranteed decades into the future. Because the Phase 1 and Phase 2 projects are independent of the Phase 3 projects, funding for the former does not commit funding for the latter. Clearly this is not a situation where the agency is claiming to approve only a relatively modest project but, in fact, is approving a much larger project of which the smaller projects are just components. Rather, the EIS has adequately appraised interested parties of the potential scope of the master plan. The EIS has not conducted a piecemeal environmental review.

The purchase of land between the airport and Hana Highway which is slated in Phase 3 for the parallel runway, is not solely for the parallel runway. The additional land will be purchased to initially bank the land to avoid encroachment by incompatible airport uses (e.g., noise sensitive facilities) and for future aviation uses. The land can be developed or left in agriculture until it is needed for other airport developments.

The bulk fuel storage facility on the airport does not commit the HDOT, Airports Division or the FMA in building the fuel pipeline to the Harbor. The bulk fuel storage facility will be supplied with fuel trucks within the planning period. However in the future (beyond the Year 2016), the aviation fuel demand may reach a transfer volume that makes the use of a fuel pipeline from Kahului Harbor a more economical method of replenishing the fuel volume in the Airport Bulk Storage facilities. As stated in the Draft EIS, that prior to the implementation of the fuel pipeline project, more environmental analysis will be performed and the applicable environmental document prepared. Also, the fuel pipeline will be designed to meet the applicable rules and regulations which are in effect at that time. In regards to the pipeline burst which occurred near Pearl Harbor, that pipeline is approximately 50 years old and does not have any modern protection against leaks and does not meet current standards.

1. The commentator insists that the construction of the Phase 2 General Aviation Facilities represents an irretrievable commitment to the parallel runway. The analysis performed for this EIS and presented in Appendix R of the Draft EIS, shows that the use of other facilities for general aviation is not a reasonable or feasible alternative, for the parallel runway. However as stated in the Draft EIS and reiterated in this response letter, prior to the construction of the parallel runway, additional environmental analysis will be completed and all reasonable alternatives will be analyzed in accordance with NEPA and HEPFA. At that time, the general aviation reliever airport alternative can be revisited. However, the General Aviation Site Selection Study (Appendix R) recommended that general aviation activities remain at Kahului Airport and the construction of a parallel runway if aviation demands require additional runway capacity. The construction of a general aviation reliever airport was not a feasible alternative and would have significant air space impacts.

The issue of potential international flight operations has been discussed and analyzed in the EIS to the extent the forecast predict an increase in international flights within the time frame analyzed. It is important to emphasize, however, that the forecast are based upon our best professional judgment. The number of international aircraft operations at Kahului Airport is primarily driven by demand or non-airport forces, and not simply by physical facilities at the airport. As stated above, limited international flights can occur within the capacities of the present facilities. Permanent FIS facilities are not proposed at the airport at this time because the forecasts do not indicate

that this type of facility is required to accommodate international operations, until the year 2010 time frame, even taking into account the potential increase in runway length.

For more information on segmentation, see response Comment IDH-2.

Noise

• Unreasonable assumption

The commentator suggests that it is unreasonable to assume that all aircraft will be Stage 3 by the Year 2010 and the current Aloha Airlines conversion to Stage 2 as an example. The assumption that the airlines will have a Stage 3 fleet by the Year 2010 is based on industry projections of the life of Stage II aircraft. The attached figure was taken from a Boeing Aircraft Company study of the economic life of US Commercial Jet Fleet (Paper by R.D. Cuthbertson, Chief 7J7 Noise Technology, Boeing Commercial Airplane Company, at the Airport Noise Symposium, November 12, 1987). This analysis of aircraft fleet was completed well before congress adopted the 1990 Airport Noise and Capacity Act. The analysis shows that economic considerations will effectively result in a natural conversion to Stage 3 aircraft by the Year 2010. The forces that result in all Stage 3 fleet are primarily the higher fuel cost for older aircraft and the higher maintenance cost for aging aircraft. This latter factor is particularly significant for high use short haul aircraft such as the Boeing 737-200 (the aircraft used by Aloha Airlines). The interisland commercial jet carriers have a much higher number of landing-and-takeoff cycles per day than is typical in the US fleet. While there are short term economic forces that have encouraged Aloha to utilize Stage 2 aircraft, including a large surplus of aircraft and spare parts, the long term maintenance cost and high fuel cost will favor conversion to newer more fuel efficient aircraft. The fact is that by the year 2010 an air carrier operating an all Stage 2 fleet will not be able to compete with carriers with lower operating costs.

We disagree with the commentator's statement that the use of the parallel runway for only arrivals is unreasonable. As stated in the Draft EIS, the operational use of the parallel runway would be to allow simultaneous operations of aircraft using Kahului Airport. The simultaneous use of the two runways, one for arrivals and one for takeoffs is beneficial in relieving capacity problems at Kahului Airport. It is

metrics account for: (i) the change in number of operations, (ii) the change in single event noise levels, and (iii) the time of day that a given noise event occurs. The relationship between frequency of noise events and human response to noise is discussed in the 1992 FICON report which recommends that cumulative noise metrics be used as the basis for environmental noise analyses. However, supplemental metrics, such as single event noise (SENEL) may be used to assist in the description of potential noise impacts. This was the strategy used in the Draft EIS, and special care was taken to present multiple analyses. The single event analysis was conducted on the aircraft which were primary contributors to the noise impacts, and also would have their flight tracks, near noise sensitive uses, altered by the Proposed Project. The noise impacts of aircraft using Runway 5-23 will not change due to the Proposed Project, and neither would the helicopter operations as their flight tracks at Kahului Airport will not be altered significantly with the Proposed Project.

• Nighttime Noise

Nighttime noise impacts were taken into account in the noise analysis provided in Section 3.2 of the Draft EIS. Specifically, the DNL descriptor describes cumulative noise exposure for an annual average day of aircraft operations, including a penalty of 10 dB for operations occurring during the nighttime hours (10:00 p.m. - 7:00 a.m.). As a practical matter, each aircraft noise event occurring during the nighttime hours is treated as if ten (10) aircraft noise events had occurred. The ten (10) dB penalty inherent to the definition of DNL, compensates for the intrusiveness of night flights. However, the actual noise level would be the same for an aircraft whether it flies during the day or night. Therefore, if the ten (10) dB penalty was removed the noise exposure would be less than presented in the Draft EIS. Furthermore, if the aircraft operations (day versus night) were segregated and analyzed separately as the commentator suggests, the noise impacts for each part (day versus night) would be less than the total noise impact as presented in the Draft EIS.

The Draft EIS, does show the change in the actual noise levels for various aircraft using the single event noise exposure metric (SEL). The SEL values would be the same for both day and night aircraft operations, and the analysis shows the differences with and without the Proposed Project. From these comparisons, the Proposed Project would have insignificant

reasonable to assume that the longer runway would be used for takeoffs, as the heavy aircraft will need the runway length takeoff to overseas destinations. Secondly, the departing aircraft are heavier and would prefer the use of the inbound runway (Runway 2L-20R). The 8,500 foot runway is adequate to land aircraft at Kahului Airport. As stated in the EIS, other runway use patterns will create different noise exposure contours. However, prior to the construction of these long-range projects additional environmental analysis will be completed in order to determine what, if any, further environmental documentation is required.

• Failure to Address Impacts Between 1994 and 2010.

The Noise Exposure Map for 1998 is shown in Appendix O of the Draft EIS and will be included in Section 3.2 of the Final EIS. In addition, the Single Event Noise Level assessment shows the actual noise impacts for the runway by aircraft and is independent of time or year. As the cumulative impact is related to the single event impacts the Proposed Project will have insignificant, and in some cases positive impacts on the noise sensitive uses in Spreckelsville.

• Use of Other Noise Metrics

The 60 dB Day-Night Noise Level (DNL) standard is mandated by the State of Hawaii. Further the FAA and other Federal agencies use DNL for noise land use compatibility guidelines. However, the Draft EIS recognizes that DNL is not universally accepted as an all-encompassing measure of noise impact. Therefore, the Draft EIS presents noise analyses in the additional metrics of Single Event Noise Exposure Level (SENEL).

DNL is a single number, cumulative noise metric which account for noise level, noise duration, number of noise events and time-of-day the noise events occur. SENEL is a single number noise metric for individual, discrete noise events which accounts for noise level and noise duration. SENEL values over a 24-hour period can be used to compute a daily DNL value. DNL and SENEL data are found in Appendix C.

It should be noted that the most common method of correlating changes in the number of aircraft operations with changes in single event noise is through the use of a cumulative noise exposure metric such as DNL. In fact, the only successful correlation of noise with human response has been in terms of such cumulative noise metrics, such as DNL. Cumulative noise

impacts, or in some cases positive impacts on the noise sensitive areas within the Spreckelsville community. Also, refer to response Comment IDH-2 regarding the segregation of nighttime aircraft operations.

- Noise Impacts of Parallel Runway

The noise impacts for the "full use" of the parallel runway were analyzed based on the most reasonable assumption on its "full use." This analysis and the potential impacts due to the use of the parallel runway is presented in Section 3.2 and Appendix C of the Draft EIS. Also refer to response "comment IDH-5 on illegal segmentation" and "unreasonable assumption" above.

- Noise Impacts on Parklands

The noise analysis in Section 3.2 and Appendix C does address the noise impacts within the airport environs, which include the Kanaha Beach Park and the Kanaha Pond Wildlife Sanctuary. As shown in the analysis the impacts to the noise environment at the Kanaha Park may be reduced under the Proposed Project due to higher altitudes that would be attained by aircraft departing Kahului Airport. The noise analysis shows that the noise impact on Kanaha Pond Wildlife Sanctuary would remain the same with or without the Proposed Project. We disagree with the commentator that this is "constructive use" of parklands.

- Noise Impacts of the Strengthening Project

Contrary to the commentator the noise impacts during construction was discussed in Section 3.2.3.1. We disagree with the commentator that this is inadequate. Similarly, we disagree with the commentator's assertions that the analysis is inadequate.

Land Use

The commentator's concerns regarding Section 3.3 of the Draft EIS include concerns regarding Kanaha Pond Wildlife Sanctuary. These concerns, however, are unfounded. As stated in response IDH-2 above, the EIS has analyzed to the extent practical and reasonable the potential environmental impacts of the bulk fuel line that has been proposed for beyond-Phase 3 of the master plan. Because this project is not proposed to be implemented

until sometime after 2016, a complete and detailed environmental analysis is not possible at this time. At that time, the potential impacts of the project on Kanaha Pond will be thoroughly analyzed and addressed. Further environmental review at this time, however, is premature and would be too speculative for meaningful analysis.

The concern with respect to the potential impacts of alien species introductions at the Airport on Kanaha Pond has been analyzed in depth in the EIS and the biological assessment that was prepared for the Proposed Project. All reasonable steps have been taken to minimize the potential risk of alien species introduction, as well as to minimize the potential impact if there are alien species introductions at the Airport. The alien species issue is discussed in Section 3.11.3, Section 5.1.6, and Appendix U.

Prime Agricultural Lands

As stated in the Draft EIS, the prime agricultural lands for the future expansion of Kahului Airport for the long-term projects will need to be reanalyzed prior to the change from agricultural to airport use. In addition, these changes would also require formal land use changes at that time. These lands will be maintained in agriculture until such time that they are needed for Airport purposes. The significance of the conversion of the additional land to Airport use will be subject to additional environmental analysis and environmental documents as required by State and Federal rules and regulations. It is not anticipated that these lands will be converted to Airport use within the Planning period of the Airport Master Plan (2010) and will probably be beyond the year 2016.

Drainage Impacts

The commentator makes a false statement by claiming that the "draft EIS falsely claims that runoff from the airport will not be discharged into the ocean." On the contrary the Draft EIS states: "Following construction, increased surface water flows into nearshore areas could affect nearshore water quality and marine life. The estimated runoff entering Kalialinui Gulch from the Phase 1 improvements, mainly from the Runway 2-20 and Taxiway 'A' extension, will be 69 cubic feet per second (cfs) during a 100 year recurrence interval event. This amount is less than 1 percent of the flow expected in Kalialinui Gulch during a 100 year recurrence interval rainfall event. The Phase 2 proposed improvements would add an additional 59 cfs during the 100 year

recurrence interval event. The computed flow during 100 year recurrence interval event for Kaliahului Gulch is 7,500 cfs."

The runoff from the airport has been discussed and analyzed in numerous subsections of Section 3.0 of the Draft EIS including Section 3.8. The water quality analysis, in Section 3.8, was performed in the nearshore water areas within the airport environs. These values were typical of nearshore waters and did not show any evidence of impacts from current Airport operations. The commentator also states that the Draft EIS complies no information about fuels, oil and greases. However, the water quality analysis included an analysis for Total Petroleum Hydrocarbon, and the results show that petroleum compounds were not detected. The Draft EIS concludes that there will be insignificant adverse impacts and discusses potential mitigation measures to minimize the amount of runoff and contaminants entering into the nearshore marine environment. These mitigation measures are stated in Section 3.8.4 of the Draft EIS. In addition, as the Airport does contribute some runoff to the nearshore area, it is considered a cumulative impact. We disagree with the commentator's opinion that the impacts of the Proposed Project will be "constructive use" of the Parklands. The impacts on Section 4(f) lands are discussed in Section 3.9 of the EIS.

Socio-economic impacts

The commentator appears to be attacking the forecasts that have been made with respect to international flight operations at the airport. No definitive information is provided, that indicates why the commentator believes that these forecasts are inaccurate. As stated in the Draft EIS, the forecasts have been performed by technical experts based upon their best professional judgment. The airport does not control the number of international flights at the Airport. Rather, the number of international flight operations is primarily driven by demand - not physical facilities. This fact is clear in many of the statements made by the commentator on page 24 of his letter. Specifically statements that JAL is interested in establishing nonstop service to Maui, assuming appropriate amendments to its bilateral agreement rights can be made. Clearly JAL is not relying on the runway extension to initiate direct service to Maui - rather JAL's decisions are demand based. These statements crystallize that JAL can and may initiate direct services to Maui prior to and irrespective of implementation of the runway extension project.

A comparative analysis of the visitor (passenger) forecasts is performed in Appendix E of the Draft EIS. It concludes that the increase in visitor growth is comparable to that used by the County of Maui for their planning purposes. Additional analysis in Appendix E, stated that this forecast could be high, however, current passenger activity at Kahului Airport and the State is following the forecast trend in the Update of Hawaii Aviation Demand Forecast.

The analysis of international flight operations are discussed in Section 6.0 and 8.2 and in detail in Appendix E. The commentator should refer to the response IDH-3, International Flight Operations. The Draft EIS also states that the growth in visitors, with internationalization can only take place with additional resort units available in 2010. The number of hotel units is controlled by Maui County and their policies on growth.

Air Quality

The air quality analysis is provided in Section 3.7 of the Draft EIS and the technical analysis is provided in Appendix F. The analysis shows that emissions from the Proposed Project will be less than that of the No-action scenario and therefore the Proposed Project will have a positive effect in the long-term.

The commentator questions the use of a screening modeling to predict the likelihood of exceedances of the air quality standards. As discussed in the air quality study for the project, a screening-level model by definition yields conservatively high estimates of maximum air pollution concentrations. If instead a more refined analysis had been performed, the predicted maximum concentrations would have been lower due to the more realistic treatment of the model variables.

The commentator suggests that a Prevention of Significant Deterioration (PSD) analysis should have been performed. A PSD analysis was not completed in connection with the proposed improvement projects because PSD requirements apply only to "major stationary sources." Almost all "major stationary sources" are industrial sources not commonly found at airports. The possible sources which are listed as "major stationary sources," that may occur on an airport are large (more than 250,000,000 Btu per hour) fossil fuel fired boilers and steam electric plants, and petroleum storage and transfer units with a storage capacity exceeding three hundred thousand barrels. None of these sources exist or are planned for Kahului Airport; therefore a PSD analysis is not required.

The commentator correctly states that the air quality analysis focused on the airport boundary and five offsite locations (roadway intersections) near the airport. Because the majority of aircraft emissions at an airport occur at or near ground level, the maximum offsite ground level concentrations attributable to airport operations can be expected to occur at the airport boundary, i.e., concentrations at locations beyond the airport boundary will be lower than concentrations at the airport. Maximum concentrations at roadway intersections near the airport were considered because airport traffic will be more concentrated at these locations and thus airport-related air pollution impacts from traffic will be higher. At more distant locations, the traffic will be more dispersed and traffic-related air pollution impacts caused by airport improvement projects will be lower. As shown in the analysis, the automobile traffic is dominated by the background traffic levels and the traffic congestion is relieved with the Proposed Project. Although the commentator indicates that three of the five intersections studied are known to exceed the air quality standards, this has not been proven. Rather, air quality modeling results have indicated that this could potentially occur during worst-case conditions, with the background traffic contributing much of the emissions.

The commentator also suggests that stability class 6 rather than stability classes 4 and 5 should have been used to assess worst-case conditions. As explained in detail in the air quality impact technical report (Appendix F of the Draft EIS), stability classes 5 and 6 can only occur during the nighttime and early morning hours. For the airport modeling of worst-case conditions, stability class 4 was assumed. This is because peak airport operations and hence peak airport emissions currently and historically occur between mid-morning and mid-afternoon. This trend will likely continue, and it was assumed that maximum concentrations would coincide with the period of peak emissions. Since it is theoretically impossible for stability classes 5 and 6 to occur during the midday, stability class 4 provides the worst-possible scenario with respect to dispersion conditions. The modeling of offsite traffic impacts was performed during the morning and afternoon peak-hours. During the afternoon, stability class 4 is the worst-possible case, and this was used in the analysis. During the early morning, analysis of weather data from Kahului airport revealed that stability class 6 occurs about 2 percent of the time (about seven days per year). Due to the infrequency of occurrence and considering that this must occur coincidentally with low wind speed conditions and the worst-case wind direction, the analyst applied professional judgement and assumed stability class 5 for worst-case

conditions. Guidance from EPA generally suggests that a less conservative stability class of 4 should be used to assess worst-case conditions at suburban locations. As indicated in the air quality impact study, stability class 5 occurs only about 11 percent of the time whereas stability class 4 occurs about 76 percent of the time.

The commentator suggests that in performing the worst-case analysis that IFR conditions rather than VFR conditions should have been assumed. When the analysis was performed, guidance on this issue was sought from both the FAA and the EPA. As described in the air quality impact report, a substantial effort was made to address this question, and it was shown that it is very unlikely that IFR conditions would coincide with either worst-case dispersion conditions or peak-hour airport operations. Hence, for the screening-level air quality analysis, VFR conditions were assumed to prevail.

It was also commented that worst-case conditions might be associated with higher temperatures than were used in the assessment. As indicated in the air quality impact report, carbon monoxide emissions from motor vehicles are inversely proportional to temperature. Thus, the lowest likely temperatures were used in the assessment which resulted in the assumption of the highest likely emissions.

The commentator appears to suggest that the air quality analysis should have considered temperature inversion conditions. When an elevated temperature inversion exists, low-level emissions can be trapped beneath, resulting in elevated concentrations at extended distances downwind from an air pollution source. While we are unaware of any data that exist which indicate that elevated inversion conditions exist for prolonged periods of time in the vicinity of Kahului Airport, it is likely that such conditions occur for short periods during the morning and possibly during brief periods when the trade winds are absent and seabreeze conditions prevail. In any case, such conditions would have no effect on the near-source concentration estimates provided in the air quality impact report. Even during periods when elevated inversions exist and cause trapping conditions to occur, maximum offsite concentrations would be lower than the near-source, worst-case values given in the air quality impact report.

The commentator indicates that fumigation can often be observed in the Kahului Power Plant plume and implies that this may be relevant to the assessment of emissions from Kahului Airport. Emissions from the Kahului Power Plant consist primarily of sulfur dioxide, nitrogen oxides and particulate matter.

Emissions from the airport consist primarily of carbon monoxide. Even if fumigation of the Kahului Power Plant plume does occur, this would have little impact on the predicted maximum 1-hour and 8-hour carbon monoxide concentrations at the airport. And since fumigation is normally a short-term phenomenon, it is unlikely this would have any significant effect on the longer-period averaging times that are relevant to the assessment of nitrogen oxides and particulate matter concentrations.

The commentator suggests that the cumulative impacts of air quality deterioration at Haleakala National Park should have been performed. The airport is not subject to PSD review, and thus the air quality analysis focused on compliance with ambient air quality standards. In any case, since the Park is nearly 20 miles from the airport and at an elevation several thousand feet above the airport and since the predicted concentrations at the airport boundary will diminish significantly with distance, any impacts at the park will be substantially lower than the predicted concentrations along the airport boundary and will therefore necessarily be less than significant.

The commentator indicates that the validity of the statewide attainment status must be called into question because the state and national air quality standards are exceeded at the intersections of Hana and Haleakala Highways, Hana Highway and Dairy Road, and Puunene Road and Kuilani Highway. The air quality study indicates that the air quality standards could potentially be exceeded at these locations based on projected worst-case modeling results. The attainment status of any given location is based on proven monitoring data. Nevertheless, the air quality study indicates that carbon monoxide levels at these locations will either remain the same or be lower with the Proposed Project when compared to the No-Action Alternative.

The commentator states that air quality monitoring data used to characterize baseline air quality is inadequate and that air quality monitoring stations were ill placed to measure impacts from existing air pollution sources. Air quality monitoring stations are usually sited to either monitor specific source impacts or to collect background data. As indicated in the air quality study, most of the data reported for Maui are from background air quality monitoring stations. The commentator also states that data from the central isthmus is used to estimate baseline data. Actually, these data were used to estimate background conditions not baseline conditions. In air quality terminology, background air pollution is taken to mean air pollution from distant, undefined sources, whereas baseline air quality is taken to mean the air pollution levels at a given

point in time. Baseline air pollution typically includes both background air pollution and air pollution from nearby sources.

The commentator expresses concern because the air quality study shows that carbon monoxide emissions from aircraft were estimated to be lower in 1992 than they were in 1980. As explained in the Air Quality Report (Appendix F of the Draft EIS) page 20, this is probably due to the increased usage of jet-turbine aircraft instead of piston-engine aircraft. Jet-turbine aircraft emit relatively low amounts of carbon monoxide. The commentator also expresses concern that aircraft emission estimates for nitrogen oxides, hydrocarbons and sulfur oxides for 1994 are lower than for 1992. While the 1994 values are slightly lower, the estimated emission rates for 1992 and 1994 are very comparable. The 1994 values may be slightly lower because aircraft operations were slightly lower in 1994 or because the 1994 emission estimates are based on more detailed aircraft operations data and are thus more accurate. In addition, the carbon monoxide emissions problem is better than in 1980 and will continue to be reduced in the future despite increases in regional and airport related traffic, because the automobiles using the roads will continue to generate less carbon monoxide per vehicle mile traveled as older vehicles are replaced by newer (cleaner-running) vehicles.

The commentator states that only the six (criteria) pollutants for which air quality standards have been established were assessed but that nearly 200 (noncriteria) contaminants are recognized under the Clean Air Act. The commentator also states that according to a 1988 document from the Department of Health (DOH) that over 92 tons of formaldehyde was emitted at Kahului Airport. An effort was made to locate and review the cited document, but the document could not be identified. As indicated in the air quality study, at the time the analysis was performed, no emission data for noncriteria pollutants could be located either at the FAA or at EPA. Insofar as we are aware, this continues to be the case, and we are unaware of any air quality study for any other airport either in Hawaii or elsewhere in the U.S. where the issue of noncriteria emissions has been quantitatively addressed. Nevertheless, as shown in Table 19 of the air quality study, emissions of the criteria pollutants in the year 2010 with the project are estimated to either decrease or remain about the same compared to the without the project alternative. Emissions of the noncriteria pollutants can be expected to follow a similar pattern.

The commentator states that cumulative impacts have not been considered. On the contrary, the air quality analysis does

provide a cumulative impact analysis for the motor vehicle traffic at the nearby intersections by including the background traffic levels in the air quality analysis. Therefore, the comparison of the No-Action to the Proposed Project shows the incremental difference of the results due to the Proposed Project. In addition, the air quality analysis included a conservatively high background concentration and the off-airport major stationary sources in the vicinity of the Airport in the analysis as stated in the technical report included in Appendix F. In the cumulative sense, there are no known new major stationary sources which will be constructed near the airport. There was no attempt to assess offsite secondary impacts beyond the cumulative assessment for motor emissions from motor vehicle traffic at nearby intersections; this was reasonable because proposed airport improvements will not significantly affect the volume of passengers or cargo at Kahului. Thus, compared to the without project scenario there are not expected to be any significant cumulative or secondary impacts. Also, as the Proposed Project will have lower emissions than the No-Action alternative, it would have a lower cumulative impact on Air Quality.

The commentator refers to the mitigation measures listed on page 5 of the air quality study (Appendix F of the EIS) and questions why there is no commitment to performing them or a discussion of how they will be implemented. As stated in the Draft EIS, Section 3.7.4, the Airport should encourage the use of capacity enhancement techniques as these capacity techniques will reduce the amount of queuing and idling by aircraft. As stated in this response and in the Draft EIS, the emissions from the Airport with the Proposed Project are far less than without the Proposed Project. Each of these proposed mitigation measures and their feasibility is discussed below.

- Increase engine speed and reduce the number of engines operating during idle and taxi:

Because of their weight and size, wide-body aircraft and heavy narrow-body aircraft need at least two engines operating to taxi safely. The thrust required to initiate movement of these aircraft is such that one engine brought to that power level would create a hazard to ground personnel and equipment. Certain aircraft could also experience directional control problems because of the adverse, unbalanced thrust that would be created by using only one engine. Such factors as weather, taxi surface, taxi slope, ramp congestion, taxiway condition/composition, directional control, the proximity of the terminal area and aircraft, and other similar conditions

also affect safe single/reduced engine taxiing and require an on-the-spot situation specific judgment of a pilot in command who is responsible for the safety of the passengers, crew members, cargo and the aircraft regarding whether or not single engine taxiing can be safely used in a specific instance.

To the extent that single/reduced engine taxiing would provide identifiable air quality benefits and if and to the extent that it is determined by the FAA and the airlines to be a safe and efficient operational procedure for air carrier aircraft at Kahului Airport, this mitigation measure may be used at the airport.

- Control departure time from gates:

The controlled departure from gates would only be applied as the level of congestion on the taxiways and runways were at a level at which the aircraft would spend more time on the taxiway, or for safety reasons. However, the ground operational situation must be determined to assess the efficiency of this mitigation measure. The use of a controlled gate departure, is a decision which needs to be coordinated with the ramp control, the airline and the FAA, and must take into account gate congestion, and airfield congestion at that time. The measure will be dependent on the congestion situation at the Airport.

- Partially towing aircraft:

FAA considers towing aircraft to be unacceptable from both a safety and an efficient utilization of airspace standpoint. This is due to operational considerations of both the aircraft and towing vehicle as well as the requirements of air traffic control. Communication and control problems during the towing operation are potentially significant and have safety implications. At the present time, an air traffic controller communicates with the pilot in command and directs the aircraft to the terminal. The use of a towing vehicle introduces the tow operator into the communications link. The tow operator is in control of the aircraft being towed, but is not responsible for the aircraft (pilot's role) or responsible for the aircraft movement (controller's role). The controller is typically about 100 feet off the ground, the pilot is 20 feet off the ground and the tow operator is only 5 feet or less off the ground. The ability to see and be seen is directly related to the height of the observer. The tow operator's

Limited visibility is a major safety concern. There is also considerable concern that the nose gear could collapse in an emergency stop from top towing speed, endangering the life of the tow vehicle driver.

In addition, pilots are extensively trained in all matters of safety, because they are accountable for the safety of passengers and equipment under their command. Such responsibility and accountability is not expected of tow vehicle operators. Therefore, according to FAA, the transference of passenger safety from the pilot to the tow vehicle operator, beyond the slow and deliberate pushback procedure, would be an unnecessary and unacceptable deterioration in aviation safety.

Because of FAA opposition, lack of aircraft manufacturer approval, and various operational limitations, the possible towing of the aircraft to the runway is not a viable option for emission reductions.

- Reduce operating time of aircraft auxiliary power supply:

At present all jet aircraft parking at the Main Terminal gates use a ground based power unit and the aircraft's auxiliary power supply unit is not used.

The commentator questions why peak-hour aircraft queuing is estimated at 13.1 planes for the no-action alternative and only 1.9 planes for the preferred alternative. It is further questioned why lengthening the airport runway would provide such a substantial reduction in the number of aircraft queuing. The estimated number of aircraft queuing for each scenario is given in Table 26 of the air quality study. This indicates that for the no-action alternative (2010/Alternative 1) an estimated 13.1 aircraft would be queued. As discussed in the text of the air quality study, the airport would actually be over capacity in this alternative, and it was assumed that air traffic control would limit peak-hour demand volume to 95 percent. For the 2010/Alternative 2 scenario, it was estimated that the total number of aircraft queued during the peak hour would be 1.9. As noted on page 26 of the report, this alternative assumes that Runway 2-20 is extended to 9600 feet, that a parallel runway is added and that helicopter traffic is relocated to another location. This alternative would both add runway capacity and reduce aircraft operations and hence would provide a substantial reduction in the number of aircraft queued. In the 2010/Alternative 3 scenario, it

was estimated that 8.8 aircraft would be queued during the peak hour. This alternative assumes that Runway 2-20 would be extended only. Lengthening the runway is expected to provide a slight improvement in runway capacity and a slight reduction in the number of aircraft operations. Because the airport is estimated to be over capacity without any improvements, queuing theory indicates these slight changes will provide substantial benefits in the number of aircraft queued.

The commentator suggests that the installation of vapor control systems on new fuel storage tanks should have been considered. As indicated in the air quality study, emissions from fuel storage tanks are regulated by state and federal standards. Any large tanks associated with the project that will contain volatile liquids must use vapor control equipment. Gasoline is highly volatile and is subject to these regulations, whereas jet fuel has a relatively low volatility and a low potential to emit air pollution while in storage.

The commentator indicates that no effort has been made to assess the potential cumulative impacts of air quality degradation on human or animal populations. As indicated in the air quality study, maximum concentrations of air pollution were estimated based on computer analysis, and the results were compared to the state and federal ambient air quality standards. Inter-comparisons were also made of the results from the various scenarios. The ambient air quality standards are designed to protect the health and welfare of humans with an adequate margin of safety. These standards have been set after extensive study and research. The projected air pollution levels with the project were either found to be within air quality standards or were found to be lower compared to the no-action case.

The commentator questions the modeling and the use of ambient air quality standards to determine significance. The primary guidelines used to measure the health of the air quality in regions or basins are the State and National Ambient Air Quality Standards (NAAQS). The EPA is required to set NAAQS for criteria pollutants that may be reasonably anticipated to be injurious to public health or welfare based upon scientific data and analysis. Similarly the State of Hawaii is required to set State Ambient Air Quality Standards (SAAQS) in order to provide a basis for preventing or abating the effects of air pollution, including the effect on health, aesthetics and economy.

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impacts to Kanaha Pond that would result if the pipeline breaks, or leaks.

Historic, Architectural, Archaeological and Cultural Resources

The FAA and HDOT, Airports Division, have been working with the State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Office to clarify the impacts of the Proposed Project and to avoid significant adverse impacts to known historical and archaeological sites. As part of this process the HDOT, Airports Division, and FAA completed additional surveys of the former Naval Air Station, at Kahului (NASKA), prepared a preservation plan for Site 1798 and a Memorandum of Agreement for additional data surveys for the Phase 2 and Phase 3 Projects. These studies and the MOA will be included in an Appendix of the Final EIS.

The strengthening of Runway 2-20 will be constructed as an overlay onto the existing Runway. This area is currently disturbed, the existing runway is constructed on filled land as shown in the Draft EIS. There will be no impact on subsurface archaeological, historical or cultural deposits, due to the runway lengthening project. No impact is expected on Site 1798, as the transient apron has been resized and a Preservation Plan has been adopted by the HDOT-AIR for this site and will be referred to in Section 3.10.

Biotic Communities

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including; The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

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The air quality analysis provided in the Draft EIS is based upon a comparison of the projected emissions with the NAAQS and SAAQS. A Prevention of Significant Deterioration ("PSD") analysis was not completed in connection with the proposed improvement projects because PSD requirements only apply to "major stationary sources." As stated above, almost all "major stationary sources" are industrial sources not commonly found at airports. None of these sources exist or are planned for Kahului Airport, and therefore a PSD analysis is not required.

Water Quality

We disagree with the commentator's statement that the Proposed Project will have significant impacts on water quality. The water quality impacts are analyzed in Section 3.4 and 3.8 of the Proposed Project. Also, refer to the response on Drainage above.

Department of Transportation Act Section 4(f)

We disagree with the commentator's opinion that the Proposed Project will have "constructive use" or "use" of Section 4(f) lands. The impacts of the Proposed Project on DOT Section 4(f) lands are discussed in Section 3.9 of the Draft EIS. The commentator sites uses which are existing impacts which would occur with or without the Proposed Project. In fact, the noise environment at the Kanaha Park may be reduced under the Proposed Project due to higher altitudes that would be attained by aircraft departing Kahului Airport. The noise analysis shows that the noise impact on Kanaha Pond Wildlife Sanctuary would remain the same with or without the Proposed Project

The fuel line from Kahului Harbor to the Airport would be underground and outside of the Kanaha Pond Wildlife Sanctuary (KPWS) and designed consistent with State and Federal Standards to minimize any impacts to the KPWS. As stated in the Draft EIS, as the fuel line is a long-range project additional environmental analysis will need to be performed prior to the implementation of the Project. Prior to constructing the pipeline, an environmental analysis will include assessing prudent and feasible alternatives to minimize the pipeline's effects on Kanaha Pond. One of those alternatives includes considering locations further from Kanaha Pond to avoid constructive use of Kanaha Pond that could result if the pipeline breaks, or leaks. If alternative locations are not prudent or feasible, mitigation measures as discussed above could be implemented to minimize

The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

The death of Hawaiian Stilts and potential mitigation measures is addressed in the Draft EIS, Section 3.11.2. This is an ongoing operational problem which will occur with or without the Proposed Project. The following will be added to the Final EIS.

The ADC at the request of HDOT-AIR has assisted with the management of wildlife at Kahului Airport and implements the Kahului Airport Wildlife Management Plan. The objectives of the ADC operations at the Airport are to reduce bird-strikes by providing technical assistance, along with lethal and nonlethal control methods through an Integrated Wildlife Hazard Management Program. The Wildlife Management Plan includes the daytime operational bird and mammal control measures, and technical assistance recommendations for habitat modifications in an integrated manner for on-going animal/airport interactions. Currently, an ADC biological technician is present at the airport each day to assist the Airport Manager in implementing the Airport Wildlife Management Plan. Egrets are monitored at Kanaha Pond and any that are found to be roosting are chased out of the sanctuary. The plover flocks and Hawaiian stilts are chased off the runways at the airport. Egrets are periodically shot along flight routes to reduce the population at Kealia Pond which is now the primary egret roost on the island of Maui. All bird control operations are restricted to daylight periods. In 1996, the ADC has prepared an Environmental Assessment (EA) for an "Integrated Wildlife Management Program at Kahului Airport" (Section 11.0, Reference 30). The ADC's EA was coordinated with the USFWS, HDOT-AIR, and the State of Hawaii, DLNR, Division of Forestry and Wildlife (emphasis

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic or international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations, general economic conditions, and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Sections 3.11.3.1 and 5.1.6.1 of the Draft EIS.

The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12.

added]. The EA addresses the additional night control activities to the existing ADC operation. These night operations would allow hazing activities to take place on an at-needed-basis, when birds such as the Hawaiian stilt, Pacific golden plovers, and barn owls become a problem.

The 1992 Programmatic Biological Opinion on the ADC program by the USFWS, and the recent consultation with USFWS and DLNR (1996) on the Kahului proposal have determined that program activities would not affect the Federally Listed Hawaiian Stilt. [emphasis added]

Alien Species

See response for biotic communities, above.

Wetlands

As stated in the Draft EIS, the wetlands have historically served as a part of the Airport drainage system. If the wetland No. 1 is to be disturbed, the mitigation has been stated in the Draft EIS and is as follows:

Wetland No. 1 has historically served as an important element in the drainage system of the northwest corner of the airport. However, the U.S. Army Corps of Engineers has designated this area as a wetland and will not allow HDOT-AIR to install drainage improvements to reduce maintenance cost and improve the drainage capabilities in this area. Therefore, in the future, if the area in Wetland No. 1 south of Alahao Street needs to be modified, HDOT-AIR would propose to replace, in kind, the wetland area lost because of future drainage improvement projects in this area. The proposed replacement wetland would be created by enlarging the portion of Wetland No. 1 located to the north of Alahao Street such that there would be no net loss of wetland area. In addition, HDOT-AIR would enhance the northern portion of Wetland No. 1 to serve as an educational feature of Kanaha Beach Park. At the appropriate time, plans and specifications for this wetland improvement will be coordinated with the COE.

Hydrology, Flood Plain Management and Drainage

See response for Drainage, above.

Coastal Zone Management Program

We respectfully disagree with the commentator. The project is consistent with the State's Coastal Zone Management Program. For drainage see response to Drainage, above. As stated in Section 3.12 of the Draft EIS, there will be no impact to the Kanaha Pond Wildlife Sanctuary and insignificant impacts on the nearshore coastal ecosystem. The noise impacts are described in Section 3.2 of the Draft EIS and the Proposed Project will have no or positive impacts on the recreational areas when compared to the No-Action alternative.

Farmland

See response to Land Use, above.

Water Supply

See discussion on alien species in response to biotic communities, above.

COMMENT IDH-6 - Section 4.0 Alternatives to the Proposed Project

The alternatives to the Proposed Project were objectively analyzed in Section 4.0 and included the No-Action Alternative and a reasonable range of alternatives to the Proposed Project as required by NEPA and HEPA. The analysis include a wide range of alternative runway lengths, different facility locations, transportation alternatives, and phasing. Some of the alternatives discussed were included in the 1993 Kahului Airport Master Plan, in the court-order, suggested in the Scoping meetings and requested by various parties. The alternatives were assessed on their environmental qualities, cost-benefit, and its ability to meet the Purpose and Need of the Proposed Project as stated in Section 2.0.

The commentator refers to Section 11-200-17(f) of the Hawaii Administrative Rules (H. A. R.) and quotes a portion of the section. However, the commentator should realize that the H. A. R. Section 11-200-17(f) state that:

"The draft EIS shall contain any known alternatives for the action. These alternatives which could feasibly attain the objectives of the action -- even though more costly--shall be described and explained as to why they were rejected."

and that HDOT, Airports Division and FAA can dictate what flights arrive and depart at the Airport. However, as stated in Section 8.2, international flights are currently occurring at Kahului Airport without the Proposed Project. In addition, international flights could occur on a one-stop basis without the Proposed Project, as with Japan Airlines' bilateral agreement. The existing facilities, can physically accommodate either one-stop or non-stop international flights operations.

The decision to initiate one-stop service to Maui from Japan is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. The HDOT, Airports Division, and FAA cannot prevent international arrivals at the Airport, therefore, only "allowing" international flights at Honolulu International Airport is not a reasonable or feasible alternative.

The "real issue" appears to be to use the airport as a control valve for the introduction of alien species. The issue of the "introduction rate" of alien species is addressed for the Proposed Project and the alternatives in the Draft EIS. This has been discussed in this response letter, item IDH-5 and is an existing problem and will not be solved by not making Kahului a non-international airport, as alien species are currently introduced through many pathways, including interisland and domestic overseas flights.

The funding for inspection by USDA of international flights through the fees collected from international passengers are the same as for those passengers deplaning at Honolulu International Airport. The USDA has stated that it has the funds needed to provide inspection at Kahului. The HDOT, Airports Division, must supply the terminal facilities if the FIS is needed for international flights.

Also, the commentator speculates that the Kahului Airport environs is "more" hospitable than Honolulu International Airport. This may not be accurate as the environment around Honolulu International Airport contains wetlands, suburban and urban gardens and lawns, golf courses and abandoned agricultural fields. Within this urbanized setting is a great diversity of alien species, that would provide ideal conditions for newly introduced alien species. Therefore, the Honolulu International Airport environs could be more or at-least equally as hospitable to alien species as Kahului Airport's environs. This is

As stated above, the Draft EIS did analyze the known alternatives which would accomplish the objectives (purpose and need) of the Proposed Project and explained why the alternatives were rejected, as applicable.

The alternative analysis was prepared in a comparative form and was substantially similar to that performed on the "preferred alternative." Also, as stated in the Draft EIS the criteria used for the alternative analysis was the same as that presented in Section 3.0 of the Draft EIS. We disagree with the commentator's opinion that the analysis of alternatives in the Draft EIS is inadequate and flawed. The response to the "general flaws" stated in his comment letter is addressed below.

Failure to address reasonable alternatives

We disagree with the commentator that these "were fashioned" and "not designed to address the real issues which have been raised". The alternatives which were analyzed encompasses the reasonable range of the alternatives to the Proposed Project. These alternatives were from the Master Plan, raised during the scoping process, presented by other interested parties, required by law, such as the No-Action alternative, or Court-order stipulations. Although the commentator does not state what the "real issues" are, he offers several "alternatives" which should be analyzed. Upon review of these "alternatives" for what the commentator perceives as the "real issues" the commentator basically addressed potential impacts and does not offer alternatives to address the purpose and need of the Proposed Project. However, we would like to offer the following point-by-point response to his "alternatives."

The alternative of one central international airport vs. multiple international airports

There are currently four airports in Hawaii; Honolulu International Airport, Kahului Airport, Hilo International Airport and Kona International Airport at Keahole, which have runway lengths that can support international service to Hawaii. Of these airports namely, Kona International Airport, Kahului Airport and Honolulu International Airport, currently receive scheduled international service. This is an existing condition and not impacted by the Proposed Project.

Unfortunately, the commentator assumes that without the Proposed Project, international flights would not occur at Kahului Airport

discussed in more detail in the biological assessment in Appendix U.

Parallel runway vs. general aviation reliever airport

The relocation of general aviation to a reliever airport was not dismissed in Alternative No. 1 as stated by the commentator. The relocation of general aviation facilities to an off-airport site was studied separately from the Master Plan alternatives and discussed in Section 4.4.3 of the Draft EIS. The Puunene site was one of the alternative sites investigated. As stated in the Draft EIS, a recent airspace analysis by the FAA in conjunction with the General Aviation Site Selection Study, concluded that there would be significant airspace conflicts with Kahului Airport. The FAA would consider a general aviation facility at Puunene under certain airspace restrictions, including the use of a Air Traffic Control Tower at Puunene Airfield.

Contrary to the commentator's comments, an environmental analysis was performed for each of the alternatives in the "General Aviation Site Selection Study", Appendix R of the Draft EIS. The conclusions of the study indicate that there are potentially significant impacts if a general reliever airfield is constructed at the Puunene Site in the categories of, Vegetation and Wildlife, Historical, Energy, Surface Transportation, Water Quality, and Public Services.

As indicated in the Draft EIS, based on the investigations performed, no portion of the original airfield pavement would be suitable for fixed-wing aircraft operations, including small, general aviation aircraft, on a regular basis. Also, the time and costs of constructing new facilities and/or rehabilitating the existing deteriorated facilities would be prohibitive. As indicated in Section 2 of the Draft EIS, the purpose of the proposed project, that is, expansion and upgrading of Kahului Airport, is to accommodate existing and forecast aircraft and passenger levels at the airport. The analyses performed to determine the extent of improvements required have taken into consideration general aviation activities.

The General Aviation Site Selection Study is a feasibility study for the relocation of helicopter operations, for a general reliever airport at Puunene or some other off-airport site, and for relocating cargo operations to Puunene. The study conclusions are discussed in Section 4.4.3. With the updated aviation forecast, the parallel runway has been forecast to be needed beyond the year 2010.

A runway extension to less than 9,600 feet and a general reliever airport elsewhere

The commentator is confusing the issue of runway capacity with the purpose of extending the runway to allow overseas aircraft to depart for long-range overseas destinations. Removing general aviation to increase the flight range of an aircraft is not a reasonable alternative and will not be incorporated in the Final EIS. The use of a General Aviation Reliever Airport to alleviate a capacity problem has been analyzed in the EIS. In addition, the commentator again pursues the "real issue" of the introduction of alien species. The Airport's runway is long enough to allow any aircraft to land at the airport and the removal of general aviation aircraft does not change this fact.

The different runway lengths were studied independent of the general aviation reliever airport in Section 4.0 of the Draft EIS. Specifically, different runway length alternatives were rigorously explored and analyzed and the relocation of general aviation to another airport was discussed. A shorter runway than proposed project, which is to allow fully loaded overseas aircraft to depart to overseas destinations. The environmental impacts of a shorter runway length, or no-action and a general reliever airport are discussed in Section 4.0 of the Draft EIS. As stated, a general aviation airport has potentially significant adverse impacts on the categories of vegetation and wildlife, historical, energy, roadways, water quality and public services.

The noise impacts are discussed above in the response to Section 3.2 Noise. The Proposed Project has an insignificant impact, or in some cases positive effect on noise for Spreckelville when compared to the No-action Scenario. Likewise, the 9,600 foot runway would have similar or less noise impacts than a shorter runway. The issue of aviation safety was considered in the analysis in the Draft EIS. The alien species issue is discussed in the response to Section 3.11, biotic communities.

Alternatives which would add to the margin of safety

The aviation safety issues are discussed in Section 3.22.9. The issue of aviation safety has been analyzed and discussed for the No-action alternative and for the different runway length alternatives for the proposed project in Section 4.0. Although proponents of the expansion project have claimed the extension will increase the margin of safety, and while the extension of

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Airports Division, and the FAA have no authority to control or to regulate the means of shipping agricultural products out of Maui, unless it jeopardizes aviation safety.

Non-operational vs. operational noise mitigation measures

The Part 150 Noise Compatibility Study was reviewed and analyzed in the preparation of the Draft EIS and discussed and summarized in Section 3.2 of the Draft EIS. The Proposed Project will have insignificant, or in some cases positive impacts on the noise sensitive areas in the airport environs. The noise abatement and noise mitigation measures recommended in the Part 150 Noise Compatibility Program are designed to reduce the existing incompatible noise sensitive areas in the Airports Environs.

The alternatives analysis for the Draft EIS, studied the reasonable and feasible alternatives for the Proposed Project for all impact categories cited in the Draft EIS. As stated in the analysis in Section 3.0, there is no adverse impact due to noise to DOT-4(f) lands and insignificant adverse impacts on endangered species due to the Proposed Project.

Unreasonable rejection of alternatives explored

Alternatives were not rejected "solely" because they do not allow international flights operations. In fact, the existing Airport can and does accommodate international flight operations. Also, the 8,500 foot runway length can support most of the aircraft used on international flights. The reasons for rejecting the 8,500 foot runway are clearly stated in section 4.3.2.1, and is not based solely on international flight operations.

The commentator states that the analysis for the alternatives were "too facile to comply with NEPA or HAPA." We disagree, as the alternative analysis was prepared in a comparative form and was substantially similar to that performed on the "preferred alternative." Also, as stated in the Draft EIS the criteria used for the alternative analysis was the same as that presented in Section 3.0 of the Draft EIS.

The runway length alternatives were evaluated on how these alternatives meet the purpose and needs for the airport to: (i) better accommodate those air carriers which currently serve destinations outside the State of Hawaii, including mid-west, east coast and future international hubs, (ii) better accommodate future projected increases in passengers and cargo leaving Maui for destinations outside the State of Hawaii, and (iii) improve

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the runway will benefit or have a positive impact on the margin of safety it is not a reason (purpose) stated for the extension. As stated in the Section 2.3.2, the runway extension is to allow for heavy aircraft to depart to long-haul overseas destinations. These more efficient direct non-stop flights may increase safety by reducing air-to-ground and ground-to-air mishaps by reducing the need to have one-stop travel to Honolulu International Airport. As stated in the Draft EIS, the end result which is a positive (beneficial) impact of the Proposed Project is that the airport will be safer and will meet current FAA rules and regulations.

The margin of safety could be increased by using "Declared Distances" and this alternative was studied and discussed in the Section 4.4.1 of the Draft EIS. However, the use of Declared Distances alone, while providing a safety area at both ends of the existing runway would not allow for long-haul aircraft to depart from Kahului airport as stated above. Furthermore, to achieve the same length of the 9,600 foot runway, the safety areas would be needed on both ends and would be 2,600 feet long. These stopways were not considered a reasonable alternative to the runway extension portion of the Proposed Project and deleted from further analysis as stated in Section 4.4.1.

Exporting agricultural produce

As stated in Section 2.3.2 of the Draft EIS and above, the purpose of the runway extension is to allow for heavy aircraft to depart to long-haul overseas destinations with a full load. A potential benefit of this would be an increased cargo carrying capacity for the long-haul overseas air carriers. However, as discussed in Section 6.5.1.6 the runway extension would increase cargo space, but not necessarily increase cargo space for agricultural products. These products would compete with non-agricultural products, and passenger's baggage for the additional cargo space. In addition, the Draft EIS states:

Thus the runway extensions would permit but not guarantee direct flights, and the direct flights in turn would permit but not guarantee substantial additional agricultural cargo space.

As increasing the aircraft takeoff weight is the rationale for the extension of the runway, the increase of cargo space for agricultural cargo is a positive (beneficial) impact for the agricultural industry and is recognized as so in the analysis of the impacts for the Proposed Project. In addition, the HDOT,

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analyses of the social, economic and growth impacts of the proposed project. The analysis can be separated into two distinct areas. The first was an analysis for the "most probable impact," and the second was a sensitivity analysis of the "potential maximal impact." Within the second analysis, the potential maximal impact, two differing theories were applied: (i) to assume that the runway length does not constrain visitors to Maui, and (ii) that the runway length, or lack of direct flights, is a constraint or discourages visitors from Maui.

We disagree with the commentator's suggestion that only the analysis using "Theory No. 2" of the second analysis should be used in assessing the impacts of the Proposed Project on growth. As "Theory No. 2" was only part of the sensitivity analysis and the hypotheses in "Theory No. 2" were suspect as stated in the Draft EIS, the conclusions cannot be based solely on "Theory No. 2." The performance of the sensitivity analysis was used as a check on the conclusions of the first "most probable impact" analysis. Therefore, the overall conclusions as stated in the Draft EIS, were based on both the "most probable impact" and the "potential maximal impact" as discussed in the Draft EIS. To base the analysis on only a portion of the entire analysis would be inaccurate and a biasing of the facts.

As stated in the Draft EIS, the overall conclusions of the different analysis shows that the runway length will have little or no growth impacts without internationalization. This conclusion was based on the "most probable impact" analysis and supported by the sensitivity analysis performed in the second analysis. Within the sensitivity analysis, the second set of hypotheses for the "Constrained No-Action Future" are suspect according to the SIAR.

However, with internationalization - that is allowing unlimited international flights to be processed at Kahului Airport - the runway extension will have a greater impact. The processing of unlimited international passengers would require a permanent international facility which would require additional environmental analysis and documentation. The impact in the near term will not be large, as Japanese tourism represents a fairly small, if growing, part of Maui's visitor industry, and that the near term consequences of international flights may just serve the current market, as the number of flights would be limited to a few flights a week. The forecast indicate that by the year 2010, there will be approximately three (3) flights per day to serve the forecast demand to Maui.

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the efficiency and flexibility of existing and forecast aircraft use at the airport and within the State. Although the commentator disagrees with the format, the fact of the matter is that most of the alternatives will have similar or identical impacts on the environment as the "preferred alternative."

COMMENT IDH-7 - Section 5.0 Cumulative Impacts

International flights have occurred and will continue to occur with or without the Proposed Project. In addition, it is possible for JAL to start service to Maui on a one-stop basis under its current bi-lateral agreement without the proposed Project. If and when a permanent international facility is needed to process international flights at the airport, a supplemental or new environmental document must be prepared in compliance with NEPA and NEPA. Also as stated in Section 8.0, overseas aircraft can operate now from Maui, with a one-stop service to the mainland, and therefore this would be a reasonable flight operation for international carriers using the existing runway length. Also, refer to response Comment IDH-8 regarding runway impacts.

Also, as discussed in Section 6.0 and Appendix E, only the Japanese have a substantial visitor activity in Maui that has the potential for additional direct service. Although Korean Airlines has recently requested to enter Kona International Airport at Keahole, there has been no formal request made for entering Kahului Airport. In recent years, Singapore Air, Malaysian Air, and Cathy Pacific have chosen to overfly Hawaii, as a whole, and fly directly to the U.S. Mainland. These airlines all have bi-lateral agreements and landing rights to Honolulu, but due to economic and strategic considerations have chosen to end service to Hawaii. Therefore, it is not currently possible to fly directly to Hawaii, let alone Maui, from southeast Asia.

The 511,000 passengers in the forecast does not mean that they are new visitors, it implies that these passengers will be arriving directly to Maui and will need the appropriate size facility at that time to accommodate these deplaning and enplaning passengers. The total passenger count does not change due to direct international flights as stated by the commentator.

COMMENT IDH-8 - Section 6.0 Growth Inducing Impacts

The Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements (SIAR) actually performed several

Beyond the near-term impacts of direct international flights, the SIAR determined that the actual impacts are virtually unknowable at this point in time, although there is a greater potential for growth inducing impacts from the introduction of unlimited international nonstop flights. It also concluded that the likelihood of "unlimited international flights" to occur is very small. However, should it occur and should the number of hotel units available be increased by the local authorities, then the Proposed Project may have an impact on the number of international visitors to Maui. This impact is on the order of about a 11 percent increase over the "Unconstrained No-Action" baseline.

A more detailed discussion of these impacts are presented in Section 6.0, Section 8.2 and Appendix E of the Draft EIS.

COMMENT IDH-9 - Section 7.0 Other NEPA and HEPA Sections

We respectfully disagree with the opinions of the commentator that the Draft EIS is inadequate and therefore undermines the analyses in Section 7.0. However, the comment will be part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Other than referring to alleged violations to HEPA and NEPA previously addressed in this response letter, the commentator has not provided any information which indicates how Section 7.0 is inadequate; therefore, no further response can be made.

The conformance of the Proposed Project with state and county plans, goals and policies and any inconsistencies have been discussed in Section 7.5 and 7.6 of the Draft EIS. In regards to the objectives and goals contained in the Hawaii State Plan, the Coastal Zone Management Act and the General Plan, the commentator, does not offer any information on how these are inconsistent and therefore, no further response can be made.

COMMENT IDH-10 - Section 8.0 Other Related Issues

Alahao Street, Stable Road

Section 8.1 of the Draft EIS shows the significant environmental impacts of connecting this road and opening it to public use. The significant adverse impacts would potentially occur in surface traffic, socio-economic and noise. The connecting of the roadway for emergency use is analyzed as part of the Proposed Project as stated in your earlier comment.

Analysis of international flight operations

This section is a summary of the potential impacts of the international flight operations and refers to the appropriate appendices which contain detailed information and analysis. The commentator does not provide specific comments for response except to state that the analysis is incomplete. As we disagree with the commentator, no further response can be made. However, the commentator's comments will be provided in the Final EIS for review by the decision makers.

Conclusion

We disagree with the commentator that the Draft EIS was prepared to deny or ignore the environmental impacts of the Proposed Project. The impact analysis in the Draft EIS was evaluated in an objective manner. The Draft EIS will not be withdrawn, rewritten or republished. Your comments along with others received during the review period, will be presented to the decision makers prior to the final decision on the EIS. A copy of the Final EIS will be sent to you under separate cover, and the changes incorporated into the Final EIS are highlighted.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 839-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachments: as noted above

c: Federal Aviation Administration (D. Welhouse)

ART. 36. SUBMISSION AND APPROVAL OF PROJECT GRANT APPLICATIONS.

(a) Submission.—(1) Subject to the provisions of this subsection, (A) any public agency, or two or more public agencies acting jointly, or (B) any sponsor of a public-use airport, or two or more such sponsors acting jointly, may submit to the Secretary a project grant application for one or more projects, in a form and containing such information as the Secretary may prescribe, setting forth the project proposed to be undertaken. No project grant application shall be proposed to be undertaken or airport planning except in connection with public-use airports included in the current national plan of integrated airport systems prepared pursuant to section 507 of this title. Nothing in this subsection shall authorize the submission of a project grant application by any public agency which is subject to the law of any State if the submission of such application by the public agency is prohibited by the law of that State. All proposed airport development shall be in accordance with standards established or approved by the Secretary, including, but not limited to, standards for site location, airport layout, site preparation, paving, lighting, and safety of approaches.

(2) Notwithstanding any provision of this title, the sponsor of any airport may submit a project grant application for airport development (including noise compatibility projects) to the Secretary within 180 days after the date of enactment of this title, and the Secretary may incur obligations to fund such projects in accordance with the provisions of this title, from funds available for obligation pursuant to section 507(f)(4), if—

(A) a project grant application or preapplication for such project was submitted to the Secretary before September 30, 1980, and (B) the project was carried out after September 30, 1980, and before the date of enactment of this title.

(3) State sponsor.—Nothing in this title shall preclude a State from submitting, as sole sponsor, a project application under this title for an airport development project benefiting two or more airports in the State or airport planning for similar projects at two or more airports in the State if—

(A) the sponsor of such airports consent in writing to State sponsorship of such projects or planning;

(B) the Secretary is satisfied that there is administrative merit and aeronautical benefit to State sponsorship of such projects or planning; and

(C) an acceptable agreement exists to ensure compliance by the State with appropriate grant conditions and other assurances required by the Secretary.

(4) Approval.—(1) No project grant application may be approved by the Secretary unless the Secretary is satisfied that—

(A) the project is reasonably consistent with plans existing at the time of approval of the project of public agencies authorized by the State in which such airport is located to plan for the development of the area surrounding the airport and will contribute to the accomplishment of the purposes of this title;

(B) sufficient funds are available for that portion of the project costs which are not to be paid by the United States under this title;

(C) the project will be completed without undue delay;

(D) the sponsor which submitted the project grant application has legal authority to engage in the project as proposed; and

(E) all project sponsorship requirements prescribed by or under the authority of this title have been or will be met.

(2) No project grant application for airport development may be approved by the Secretary unless the sponsor, a public agency, or the United States or an agency thereof holds good title, satisfactory to the Secretary, to the landing area of the airport or site therefor, or gives assurance satisfactory to the Secretary that good title will be acquired.

(3) No project grant application for airport development may be approved by the Secretary which does not include provision for (A) land required for the installation of approach light systems; (B) touchdown zone and centerline runway lighting; or (C) high intensity runway lighting, when it is determined by the Secretary that any such item is required for the safe and efficient use of the airport by aircraft, taking into account the type and volume of traffic utilizing the airport.

(4) No project grant application for airport development may be approved unless the Secretary is satisfied that fair consideration has been given to the interest of communities in or near which the project may be located.

(5) It is declared to be national policy that airport development projects authorized pursuant to this title shall provide for the protection and enhancement of the natural resources and the quality of the environment of the Nation. In implementing this policy, the Secretary shall consult with the Secretary of the Interior and the Administrator of the Environmental Protection Agency with regard to any project included in a project grant application involving airport location, a major runway extension, or runway location which may have a significant impact on natural resources including, but not limited to, fish and wildlife, natural, scenic, and recreation assets, water and air quality, and other factors affecting the environment, and shall authorize no such project found to have significant adverse effect unless the Secretary shall render a finding, in writing, following a full and complete review, which shall be a matter of public record, that no feasible and prudent alternative exists and that all reasonable steps have been taken to minimize such adverse effect.

(6)(A) No project grant application for airport development involving the location of an airport, an airport runway, or a major runway extension may be approved by the Secretary unless the sponsor of the project certifies to the Secretary that there has been afforded the opportunity for public hearings for the purpose of considering the economic, social, and environmental effects of the airport or runway location and its consistency with the goals and objectives of such planning as has been carried out by the community.

(B) When hearings are held under subparagraph (A) of this paragraph, the project sponsor shall, when requested by the Secretary, submit a copy of the transcript to the Secretary.

(7)(A) No project grant application for a project involving airport location, a major runway extension, or runway location may be reviewed unless the Governor of the State in which such project is to be located certifies in writing to the Secretary that there is reasonable assurance that the project will be located, designed, constructed, and operated so as to comply with applicable air and water quality standards. In any case where such standards have not been approved and where applicable air and water quality standards have been promulgated by the Administrator of the Environmental Protection Agency, certification shall be obtained from such Administrator. Notice of certification or refusal to certify shall be provided within sixty days after the project application has been received by the Secretary.

(B) The Secretary shall condition approval of any such project grant application on compliance during construction and operation with applicable air and water quality standards.

(f) Notwithstanding any other provision of law, the Secretary may approve an application for an airport development project (other than an airport development project to which paragraph (7)(A) applies) at an existing airport without requiring the preparation of an environmental impact statement with respect to noise for such project if—

- (A) completion of the project would allow existing aircraft operations at the airport that involve aircraft that do not comply with the noise standards prescribed for "stage 2" aircraft in section 36.1 of title 14, Code of Federal Regulations, to be replaced by aircraft operations involving aircraft that do comply with such standards; and
- (B) the project complies with all other statutory and administrative requirements imposed under this title.

(g) In establishing priorities for the distribution of funds available pursuant to section 607 of this title, the Secretary may give priority to approval of projects that are consistent with integrated airport system plans.

(c) STATE STANDARDS.—The Secretary is authorized to approve standards, other than standards for safety of approaches, established by a State for airport development at public-use airports in such State which are not primary airports, and, upon such approval, such State standards shall be the standards applicable to such airports in lieu of any comparable standards established under subsection (a) of this section. State standards approved under this subsection may be revised from time to time, as the State or the Secretary determines necessary, subject to approval of such revisions by the Secretary.

(d) ACCEPTANCE OF CERTIFICATION.—The Secretary is authorized in connection with any project to require a certification from a sponsor that such sponsor will comply with all of the statutory and administrative requirements imposed on such sponsor under this title in connection with such project. Acceptance by the Secretary of a certification from a sponsor may be rescinded by the Secretary at any time. Nothing in this subsection shall affect or discharge any responsibility or obligation of the Secretary under any other Federal law, including, but not limited to, the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.), section 4(f) of the Department of Transportation Act (49 U.S.C. 1652), title VI of the Civil Rights Act of 1964 (42 U.S.C. 20006), title VIII of the Act of April 11, 1968 (42 U.S.C. 3601 et seq.), and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601 et seq.).

(e) REQUIREMENT OF NOTICE.—Each sponsor to which funds are apportioned under section 507(a)(1) or (a)(2) of this title shall notify the Secretary

by such time and in a form containing such information as the Secretary may prescribe, of the fiscal year in which it intends to apply for such funds. If a sponsor does not provide such notification, the Secretary may defer approval of any application for such funds until the fiscal year immediately following the fiscal year in which such application is submitted.

SEC. 510. UNITED STATES SHARE OF PROJECT COSTS.

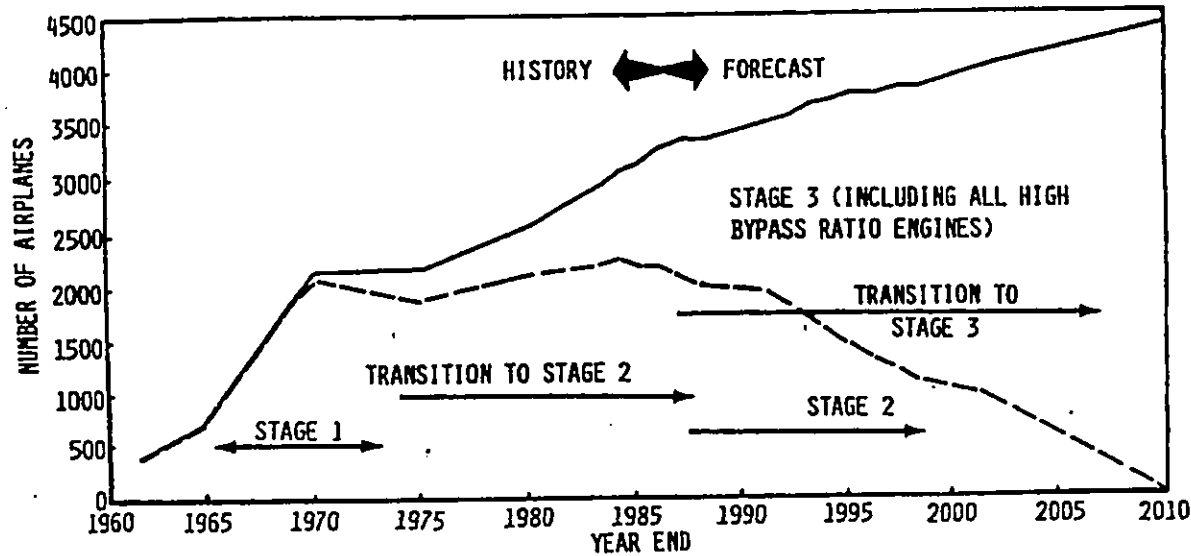
(a) GENERAL PROVISION.—Except as otherwise provided in this title, the United States share of allowable project costs payable on account of any project contained in an approved project grant application submitted in accordance with this title shall be 20 percent of the allowable project costs.

(b) PROJECTS AT CERTAIN PRIMARY AIRPORTS.—In the case of primary airports enclaving 0.25 percent or more of the total number of passengers enclaved annually at all commercial service airports, the United States share of allowable project costs payable on account of any project contained in an approved project grant application shall be 25 percent of the allowable project costs.

(c) PROJECTS IN PUBLIC LAND STATES.—In the case of any State containing unappropriated and unreserved public lands and non-taxable Indian lands (individual and tribal) exceeding 5 percent of the total area of all lands therein, the United States share under subsection (a) or (b) shall be increased by whichever is the smaller of the following percentages thereof: (1) 25 percent, or (2) a percentage equal to one-half of the percentage that the area of all such lands in that State is of its total area. In no event shall such United States share, as increased by this subsection, exceed the greater of (A) the percentage share determined under subsection (a) or (b) of this section, or (B) the percentage share applying on June 30, 1975, as determined under subsection 17(b) of the Airport and Airway Development Act of 1970.

FIGURE 6. BOEING MARKET FORECAST OF U.S. COMMERCIAL JET FLEET

COMMENT: OVER THE NEXT TWO DECADES THE AIRLINES WILL BE REPLACING THE 'STAGE 2 FLEET WITH NEW AIRPLANES AS RAPIDLY AS THEIR ECONOMIC SITUATION WILL PERMIT.



NR7503

ISAAC DAVIS HALL
ATTORNEY AT LAW
2087 WELLS STREET
WAILUKU, MAUI, HAWAII 96793

OF COUNSEL
G. RICHARD GEDICH

RECEIVED

March 17, 1997

97 MAR 20 P 4:19

FAX (808) 244-8017

Governor Benjamin Cayetano
State of Hawaii
c/o Office of Environmental Quality
Control
220 S. King St., 4th floor
Honolulu HI 96813

David Hinson, Administrator
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

Re: Supplemental Comments upon the Joint Federal and State Draft
Environmental Impact Statement for certain proposed Kahului Airport
Improvements; Kahului, Maui, Hawaii; TMK Nos. (II) 3-8-01 and 3-8-79

Dear Governor Benjamin Cayetano and Federal Aviation Administrator David
Hinson:

These comments are submitted on behalf of the Sierra Club, Mary
Evanson, Maui Air Traffic Association, Steven Pitt, James Bendon, the
National Audubon Society, Hut Alanul o Makena, Dana Naone Hall and Maui
Malama Pono, Inc. This letter will supplement the comments which we have
submitted earlier. Two additional sources of information should be added to
the record and considered before accepting the Final EIS. These are as follows.

1. Comments of Mr. Paul Brewbaker as Chief Financial Forecaster for
the Bank of Hawaii

An editorial appeared in the Maui News on Sunday, March 2, 1997
containing the comments of Mr. Paul Brewbaker, the Chief Financial
Forecaster for the Bank of Hawaii. He had spoken at a Maui Chamber of
Commerce luncheon.

Mr. Brewbaker noted that within six months after a longer runway
opened up the way for direct flights from Japan to the Keahole International
Airport, Japanese tourism increased by 50% in West Hawaii. He joked that
"Maui got the terminal, but the Big Island got the runway."

He further noted that there was nothing to do on the Big Island for
Japanese tourists; Maui is different. The Maui Marketplace is now being
constructed on Dairy Road in Kahului and is billed as a "mini-Walkele," he
said. Oahu's Walkele Center has drawn huge crowds of Japanese spenders. The

See Comment No. IDH-1

Marketplace is banking on the Japanese visitors to supply a strong share of its
business. In addition, Kaahumanu Center has been directing more of its
marketing efforts towards the Japanese. See Exhibit "1" attached hereto.

This is just one more example of what is commonly known elsewhere but
denied in the Final Environmental Impact Statement ("Final EIS"), namely: (a)
that the extension of the runway to 9,600 feet at the Kahului Airport will
facilitate direct international flights from Japan, (b) that Japanese tourism
increased in Kona by 50% within six months after the longer runway opened
and (c) that the increase on Maui may be greater than on the Big Island
because (i) there is nothing to do on the Big Island and (ii) Maui has
Kaahumanu Center and the Maui Marketplace, among other attractions.

The Maui Chamber of Commerce reportedly supports the lengthening of
the runway to "cash in" on direct flights from Japan. The construction of a
"mini-Walkele" near the airport is the kind of induced growth denied in the
Final EIS. It is also a clear demonstration of the causal link between the
extension of the runway and direct flights from Japan resulting in direct and
indirect impacts, which have not been addressed. Mr. Brewbaker is an
economist well-versed in Hawaii's tourism economy. There is no justification
for ignoring the facts he takes for granted in the Final EIS.

2. Hayashida to Cayetano Memorandum

On February 18, 1997 the Director of the Department of Transportation,
Kazu Hayashida, wrote to Governor Cayetano that the record of decision for
the Final EIS can now be signed in September 1997 and that, thereafter,
capital improvements projects will be initiated at the Kahului Airport. This
document is attached as Exhibit "2".

This Memorandum demonstrates that the Department of Transportation
and Governor Cayetano have already made up their minds to accept the Final
EIS before they have even seen it, whether it is adequate or not, and that they
intend to initiate the capital improvement projects at Kahului Airport whether
or not compliance has been achieved with state and federal environmental
laws. Director Hayashida and Governor are therefore already violating NEPA
and HEPA.

Please make this letter and the exhibits attached to it a part of the
record which will be reviewed by Governor Cayetano and the Federal Aviation
Administration prior to accepting the Final EIS for the Kahului Airport.

See Comment No. IDH-2

Please contact me if you have any questions about any of the above. I look forward to hearing from you.

Sincerely yours,

Isaac Hall
For the Sierra Club, Mary Evanson,
Maui Air Traffic Association, Steven Pitt,
James Bendon, The National Audubon
Society, Dana Naone Hall and
Maui Malama Pono, Inc.

Dana Naone Hall
Dana Naone Hall
For Hui Alanui o Makena

IH/DNH/jp
cc: Maui Malama Pono et al.
Office of Environmental Quality Control
David Welhouse

An Editorial From
The Maui News

Economically 'not encouraging'

At least the news wasn't all bad. Inflation in Hawaii should remain at manageable levels this year, economist Paul Brewbaker told the audience last week at a Maui Chamber of Commerce luncheon. Brewbaker, chief financial forecaster for the Bank of Hawaii, delivered a message very much in character with the economic climate that has encumbered our state through most of the '80s — blah!

Or, to use his words: "Not encouraging." Congenial by nature, Brewbaker wasn't particularly downbeat as he addressed a group of Maui business and civic leaders. It just grew, but it could be worse, he said, to be his underlying tone.

We'll probably see any growth in tourism, perhaps even some shipping, and there's no sign of much improvement anywhere in the economy. The construction industry, as a whole, is still in a state of stagnation. It's not that there's no money in the economy, but the pace of the industry is slow. Brewbaker predicted that the Maui economy will probably be in a state of stagnation through most of 1986 and into 1987. Although the Japanese are still a major market for Maui, he said, they're not as big a player as they were in the late '70s. Maui's economy began to cool last year, he said, and it's still cooling. The Maui economy is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation.

On a good note, however, Brewbaker predicted that the Maui economy will probably be in a state of stagnation through most of 1986 and into 1987. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation.

Even so, Maui saw its Japanese tourism increase by 11 percent during the last year. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation.

No doubt had he called for a show of support for the Maui economy. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation. Maui's supply of construction workers is still in a state of stagnation.

EXHIBIT '1'

MAJORITY REPORT
BY THE DIRECTOR
OF THE DEPARTMENT OF
TRANSPORTATION
AND
AIR-EN
97.1274



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

DEPARTMENT OF TRANSPORTATION
AND
AIR-EN
97.1274



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

February 18, 1997

To: The Honorable Benjamin J. Cayetano
Governor of Hawaii
From: Kazu Hayashida, Director
Department of Transportation
Subject: KAHULUI AIRPORT ENVIRONMENTAL IMPACT STATEMENT (EIS)

The Federal Aviation Administration (FAA) has informed us that they have revised the schedule for the Kahului Airport EIS in order to include the Biological Opinion on the Alien Species Biological Assessment by the U.S. Fish and Wildlife Service in the final EIS. The Record of Decision (ROD) by the FAA is now estimated to be signed in late September 1997. It was previously scheduled to be issued on June 15, 1997. Upon receipt of the ROD, we may then initiate capital improvement projects at Kahului Airport.

Please have your staff contact Stephen Takashima, Head Planner, at 528-8810 to clarify any questions you may have.

Mr. Isaac Davis Hall
2087 Wells Street
Wailuku, Hawaii 96793

Dear Mr. Hall:

Subject: Supplemental Comments upon the Joint Federal and State Draft Environmental Impact Statement (EIS) for certain Kahului Airport Improvements, Kahului, Maui, Hawaii
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comments on the Draft EIS for the Kahului Airport Improvements. This letter is in response to your letter dated March 17, 1997, which is attached for reference. (Previous comment letters were submitted on May 23, 1996; June 21, 1996; and April 4, 1997. These comment letters have been responded to separately). Your letter will be made available to the decision makers prior to a decision on the Proposed Project.

COMMENT NO. IDH-1 - Comments of Mr. Paul Brewbaker as Chief Financial Forecaster for the Bank of Hawaii

The EIS is being prepared for the Proposed Project at Kahului Airport, Kahului, Maui and not for Keahole International Airport, and a comparison based on an editorial would probably not suffice as an adequate analysis. Also the Draft EIS, has stated that the extension of the runway to 9,600 feet at Kahului Airport may facilitate direct international flights from Japan.

Japanese tourism did increase in Kona by 50% within six months after the longer runway opened and the granting of a bilateral to Japan Airlines for three flights per week. The Draft EIS, in Section 6.0, states that "Japanese tourism still represents a fairly small, if growing, part of Maui's visitor industry, and

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97.1274

Mr. Isaac Davis Hall
Page 2
August 20, 1997

virtually all industry experts who were interviewed for the report concluded that initial consequences would be limited to a few flights a week, and these might just be serving the current market. Note that the number of Japanese visitors to Maui made up 13.4 percent of the total visitor arrivals in 1993.

The increase of passengers projected for Maui are included in the Draft EIS, and the effect on the immediate areas within the Kahului Airport area is discussed in the Draft EIS, (see Sections 3.5, 3.6, 5.1.1 and 6.0 and Appendix E). The influence of Japanese visitors to Maui was discussed and analyzed in the Draft EIS (See Section 3.5, 3.6, 6.0, B.2, and Appendix E).

COMMENT NO. IDH-2 - Hayashida to Cayetano Memorandum

The memorandum from Mr. Hayashida to Governor Cayetano was to simply update the schedule of the Kahului Project and does not imply any pre-decision on the part of the Governor. The Final EIS will be reviewed by the appropriate agencies and approving authorities prior to a final decision on the EIS.

If you have any questions, please contact Mr. Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachments: as reference above

c: Federal Aviation Administration (D. Welhouse)

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
REV. MUTICHOWAL SHEET I
HONOLULU, HAWAII 96813-5097



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
REV. MUTICHOWAL SHEET I
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Dwight L. Hamilton
150 Leimamo Street
Hilo, Hawaii 96720

Dear Mr. Hamilton:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of April 26, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DLH-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

4-20-96
MAY 2 1998

Dear Mr. Westhouse,
This is concerning the proposed extension to the Kahului, Maui, airport. It seems the EIS should have been more adequately addressing the issue of introduction of alien plant and animal species. With Haleakala National Park so close, introduction of such species would pose a real threat to its unique environment. I believe inspections and quarantine procedures for the airport should be established. We don't want the Brown Tree Snake, or other aliens, here! It would appear appropriate, also, to include The National Park Service in these discussions as they represent the "people" in the care and protection of Haleakala National Park. Thank you for your consideration.
Sincerely,
Dwight L. Hamilton
150 Leimamo St. Hilo, HI 96720

DLH-1
C
S
F

DLH-2
See Comment

DLH-3
See Comment

candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOF issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOF. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOF have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This

information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DLH-2 - Quarantine and Inspection Services

The State Department of Transportation, Airports Division is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT DLH-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOF, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOF, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment

Mr. Dwight L. Hamilton
Page 4
August 20, 1997

AIR-EN
97.941

Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (800) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

June 20, 1998

To: OEQC/ David Malhouso, FAA

RECEIVED

Re.: Draft EIS, Kahului Airport Improvements

From: Lisa Hamilton

Dear Sirs:

From testimony by the scientific/medical community, alien species and disease introduction is the most significant potential impact from Kahului Airport expansion. Particularly damaging would be introductions from the tropics. This threat to the economy and health of Maui's people, we are told, has not been adequately addressed in the subject Draft, however.

ADAT Sales, LTD, was hired (Jan 1998) by the Hawaii Visitors Bureau to "sell Hawaii" to tourists in the region of the Asian tropics.

According to its' contract with the HVB, ADAT will be "responsible for all dealings with airlines" from the Asian tropical region. (Emphasis added. Attachment "1" (5), Agreement).

To help fill this information gap, I request that this EIS include information regarding ADAT Sales, LTD. Of particular importance: ADAT's contacts with the all airlines, which might fly into the state generally and Maui specifically; the quarterly "written activity reports"; the identity of the individuals involved in ADAT, their background and their connection to and relationship with specific tourist-related entities here in Hawaii, particularly on Maui.

Thank you.

Sincerely,

Lisa Hamilton
Lisa Hamilton

S. R. Box 190, Hana, HI 96713

Enclosures: News clips.

POSTED
7/2/98

905-555-3333

\$200,000 non-bid Contract

HVB hires two firms for marketing duties

A Bangkok agency will sell Hawaii abroad while a local company helps with the mainland effort

S. O. 2/6/96

By Russ Lyden
Star-Bulletin

The Hawaii Visitors Bureau has picked a Bangkok-based travel firm, ADAT Sales Ltd., to sell Hawaii among millions of potential tourists in Southeast Asia, Indonesia and India.

The HVB also said it has contracted a Honolulu firm, Younger Direct Marketing Inc., to disseminate travel publications and materials in North America and gather data about those who request information about Hawaii.

HVB President Paul Casey said ADAT, with offices throughout the area, will cover Thailand, Hong Kong, Singapore, Malaysia, Indonesia, Brunei, India, Sri Lanka, Myanmar and Vietnam.

"They have a deep understanding and a wealth of experience in the Asia market," Casey said today, when the appointment became effective. "As well, they have knowledge of our destination through their work for other Hawaii-based tourism clients."

Alvin Zeche, ADAT chairman, said in an HVB issued statement that the regions of Southeast and Southwest Asia are the fastest growing travel

source markets in the world. Casey recently completed a reorganization within the HVB and has said that the bureau will concentrate on marketing and use outside firms whose expertise make them more productive than the HVB.

That is the case with the \$300,000-a-year contract to Younger Direct Marketing to respond to telephone calls to HVB-800 numbers.

The 8-year-old market research and database management firm will fulfill requests from potential tourists and travel agents, and, at the same time, gather geographical, personal and travel intentions data about the callers.

The contract, which runs through June 1999, calls for delivery of consumer and travel trade literature in North America, particularly the islands of Aloha, the HVB's travel planner published by Deskjet Publications Inc. Tom Koomoto, HVB director of publications and marketing services, said requests for the planners from individuals will be passed on to Davick, which will send them out free along with Davick's marketing Aloha. Younger will handle bulk publications requests from travel agents.

See Comment Page 2



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
840 PUNICHOXIL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

PAULINA FINE
DIRECTOR
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
840 PUNICHOXIL STREET
HONOLULU, HAWAII 96813-5097

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AUGUST 20 1997
AIR-EN
97.1110

Ms. Lisa Hamilton
Page 2
August 20, 1997

AIR-EN
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In 1995, the Federal Aviation Administration (FAA) and the HDOOT initiated early and informal consultation with the FWS regarding the potential impacts of the proposed project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the proposed project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS

Ms. Lisa Hamilton
S.R. Box 190
Hana, Hawaii 96713

Dear Ms. Hamilton:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of June 20, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT LH-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), Department of Interior and National Park Service (NPS), and the Hawaii Department of Transportation (HDOOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to International arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT LR-2 - Growth Inducing Impacts of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways

Ms. Lisa Hamilton
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August 20, 1997

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Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity

analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT LH-3 - ADAT Sales, Ltd Contract With Hawaii Convention and Visitors Bureau

The HDOT, Airports Division, is not a party to the contract between the Hawaii Convention and Visitors Bureau and ADAT Sales, Ltd. We suggest you contact the Hawaii Convention and Visitors Bureau regarding this issue. As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. That is, the proposed improvements to Kahului Airport are in response to existing and forecast aviation activity and passenger levels. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

Ms. Lisa Hamilton
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August 20, 1997

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If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: AS noted above

C: Federal Aviation Administration (D. Welhouse)

STATE OF HAWAII
 DEPARTMENT OF TRANSPORTATION
 863 PUNCHBOWL STREET
 HONOLULU, HAWAII 96813-5097



STATE OF HAWAII
 DEPARTMENT OF TRANSPORTATION
 863 PUNCHBOWL STREET
 HONOLULU, HAWAII 96813-5097

August 20, 1997

DONALD G. HASENYAGER
 Post Office Box 866
 Volcano, Hawaii 96785

May 1, 1996

David J. Wellhouse
 Federal Aviation Administration
 Airports District Office
 Box 50244
 Honolulu, Hawaii 96850

Re: Environmental Impact Statement (EIS) for Expansion
 of the Kahului Airport on Maui

It is my understanding that the proposed expansion of
 the Kahului Airport will facilitate and encourage the
 landing of international flights at this airport.

It is also my understanding that the EIS does not address
 adequately the risk of introducing non-native species
 to an island with an International Biosphere Reserve at
 Haleakala National Park, as an area containing numerous
 endangered species. The airport is only 15 miles from
 the Park, and at altitudes from sea level to 10,000 feet,
 is susceptible to damage by a very wide variety of invading
 species. The EIS is for this reason unacceptable.

It might be acceptable if it clearly established the re-
 quirement for strict inspection and quarantine procedures
 at the airport to detect the presence of any incoming
 non-native species. Without this, the chances of devastating
 biological results are clearly apparent.

Thank you for considering my concerns in this matter.

Sincerely,

Donald G. Hasenyager
 Donald G. Hasenyager

Copy furnished:
 Owen Miyamoto, Dept of Transportation,
 Airports Division, Honolulu

Mr. Donald G. Hasenyager
 P. O. Box 866
 Volcano, Hawaii 96785

Dear Mr. Hasenyager:

Subject: Comments on Draft Environmental Impact Statement (EIS)
 Kahului Airport Improvements, Kahului, Maui
 State Project No. AM1011-07

Thank you for your comment letter of May 1, 1996 on, the
 Draft EIS for the proposed Kahului Airport Improvements. This
 letter is in response to your comments, which are attached for
 reference.

COMMENT DGH-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in
 Section 8.2 of the Draft EIS. In addition, the following
 information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that
 airlines must receive government approval, through the U.S. State
 Department and U.S. Department of Transportation, to fly a given
 international route before the flights can begin. International
 air service routes are generally negotiated between the U.S. and
 foreign governments, they may sometimes be provided on the basis
 of comity and reciprocity in the absence of an agreement, and
 some foreign air carrier operations to U.S. airports may be
 authorized by exemption under the so-called Cities Program in
 limited situations. The terms of any bilateral agreements vary
 greatly from country to country, and new agreements are
 negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan
 allow Japan Airlines (JAL) to provide one-stop service from Tokyo
 to Kahului with a stopover in Honolulu. Up to this point in
 time, JAL has elected not to fly to Kahului, choosing instead to

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See Comment DGH-1

See Comment DGH-1

terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT DGH-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with

the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.1.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact of the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be

Mr. Donald G. Haseenyager
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August 20, 1997

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included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DGH-3 - Effect of Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

May 12, 1996

Mr. David J. Welhouse
FAA, Airports District Office
P.O. Box 50244
Honolulu, HI 96850-0001

Mr. Welhouse,

I am commenting as an eleven-year resident of Maui. While I have not been able to read through all five volumes, I have read portions of the draft EIS which does not seem to address other airport concerns.

One of the first things I noticed was there were no proposals to improve the current direction of Kahului Airport traffic. Except for cars headed for the parking lot, all vehicles must travel in a counter-clockwise direction. By allowing car rentals a more direct route to car rental areas, traffic could be reduced considerably and public safety improved with pedestrians crossing to and from the main terminal. The traffic congestion during peak times and inadequate airport security will need to be addressed sooner or later.

Could providing free parking for the first 30 minutes help to reduce terminal congestion? In the four or five times going to old Denver Airport (Stapleton), I noticed that traffic was very smooth and without the congestion observed at most local Hawaii Airports.

The draft EIS also reviews various proposals to improve airport access roads and traffic improvements. The existing drainage plans for the area is inadequate in addressing cumulative effects. The A&B underground retention basins built for proposed commercial development may not be adequate. The current capacity may not be as stated in their proposed plans. Some of the areas being developed are located in previous wetland areas. Filling wetlands does not remove the water found underground. The current drainage system has standing water which may make potential capacity calculations overestimated. The existing drainage system should be re-evaluated and retention capacities estimated.

There are no plans to improve the quality of water or drainage runoff. The results for water testing and comparison with other test results were not presented fully. I am not sure that some samples (AECOS) were taken from the same locations or depths and the use of geometric means may be an index to discuss relative test results. Further tests were not conducted to determine test variability at other times or during other seasons and different rainfall conditions.

See Comment SH-1

See Comment SH-2

See Comment SH-3

Mr. Welhouse
May 12, 1996
Page 2

The topic of water needs for the airport lacks a comprehensive water/drainage plan. Does the proposed drainage system handle the runoff from an extended runway? I believe the report states that a plan will be prepared at the time of an runway extension.

The impact on drainage should be assessed. Similar to the highway alternatives for the Hana Highway and Dairy Road Intersection, it is a potential alternative and should be reviewed in the draft EIS. Except for stating that drainage will be directed to the Kalia/Inui drainage ditch, or be allowed to runoff into fields to the north, there are no comprehensive integrated watershed management plan. There is no water conservation plan. There is no plan to landscape with native plants which could require less water to maintain. There are no measures to redirect runoff to landscape green areas or retention basins to reduce drainage runoff.

In regards to introduced species, I have worked with two aquatic species introduced to Maui since 1988. The Asiatic clam (*Corbicula fluminea*) was introduced to plantation reservoirs and the apple snail (*Pomacea canaliculata*) were introduced to taro lo'i. Both species were introduced by people for food. These species were likely transported by airplanes. The few species which become established are just the tip of the iceberg of introduced species problems. The further we change the natural environment, the greater the probability of establishing exotic species while displacing native species at the same time. The current system is more concerned about bringing people to the islands and less concerned about their intentional or unintentional exotic species.

The current document continues to invoke more questions about the different proposals than it answers.

Thanks for letting me comment.
Sincerely,

Skippy Hain
Skippy Hain
40 Kapi Lane #104
Wailuku, HI 96793
Telephone #(808) 244-3894

See Comment SH-1

See Comment SH-2

See Comment SH-3



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5007

ATTENTION:
AIRMAIL SERVICE
Brian A. Minardi

REPLY TO:
AIR-EN
97-901

Mr. Skippy Hau
Page 2
August 20, 1997

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COMMENT BH-3 - Water Quality Measurements

The water quality measurements made specifically for the Draft EIS were checked against those made at other times in the same vicinity of the stations used for the Draft EIS. All measurements were in close correlation and we have no reason to believe they do not reflect actual conditions at varying times of the year.

COMMENT BH-4 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

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On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT.

August 20, 1997

Mr. Skippy Hau
40 Kapi Lane #104
Wailuku, Maui 96793

Dear Mr. Hau:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 12, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT BH-1 - Traffic Patterns/Parking

The potential effects of the Proposed Project on the surface transportation system in the airport environs is discussed in Section 3.22.8 of the Draft EIS. Further, traffic routings and patterns at Kahului Airport have been studied since the mid-1980s. At present, we believe the present traffic pattern, and that proposed as part of the Proposed Project, is the most efficient traffic pattern for Kahului Airport. We will continue to study traffic movement in and around the airport and implement changes as required.

With regard to free parking in the airport parking lot, parking is handled by a concessionaire to the Hawaii Department of Transportation (HDOT), Airports Division. Any changes to present fees would have to be made by the concessionaire.

COMMENT BH-2 - Proposed Drainage System

The proposed drainage system has been planned by an experienced team of civil engineers who are very familiar with runoff patterns and historical surface water flows in the airport area. The system planned will be capable of handling all surface water runoff from a 100-year storm at the airport.

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Mr. Skippy Hau
Page 4
August 20, 1997

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

AIR-EN
97.901

Mr. Skippy Hau
Page 3
August 20, 1997

Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")



Kahului Airport Runway Extension EIS
May 8, 1996
Page Two

May 8, 1996

Mr. David Welhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Honolulu, Hawaii 96850

Mr. Kazu Hayashida
State of Hawaii
Department of Transportation
Airports Division
400 Rodgers Blvd. Suite #700
Honolulu, Hawaii 96819

Subject: Kahului Airport Runway Extension EIS Testimony

Gentlemen:

My name is Wayne N. Hedani and I am here before you as Property Manager representing Kapalua Land Company, Ltd. an employer of 350 employees at Kapalua in West Maui.

Kapalua Land Company, Ltd. supports the proposed extension of the runway to 9600 feet and its related improvements to roads, parks, drainage systems and traffic improvements.

We believe that adequate time and care has been spent in reviewing the proposed project and that it is essential that we move expeditiously to complete these infrastructural improvements quickly and completely with due care given to environmental concerns. Any concerns raised can and will be addressed.

We have studied the environmental impacts and identified them. We have heard time and time again, the concerns over safety related by the airline pilots association representatives. We have seen Kona successfully proceed with their runway extension to 11,000 feet and believe this will aid their ailing economy. Its time that we pay due care and diligence to improving Kahului Airport, in order that it may adequately address our transportation needs going into the 21st century.

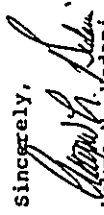
We could use the construction jobs. We could use an increase in occupancy. We need the infrastructure to be able to compete in an increasingly competitive marketplace. We need basic infrastructure to help us diversify our economy be it visitor industry, agriculture, or high technology.

Our State is currently hurting from a downturn in tax revenues. Everyone is impacted from state and county employees to schools to parks to hospitals to non-profit agencies. Unemployment and bankruptcies are at an all time high. We have infrastructural dollars available which can and should be put to good use in stimulating our economy and establishing a basis for a return to a financially and environmentally healthier state and county. We should do it now.

If dollars are needed to address alien species control, we will go after those dollars. Having our tax revenues and budgets cut and stretched tight is the opposite of what is needed to fund adequate control and interdiction measures. Our current do nothing condition is worse for the environment than one with full and adequate funding for inspection and controls. Our choices are clear. The funding we need comes only from a growing, vibrant and healthy economy. Doing nothing only leads to environmental and economic degradation, deterioration and decay.

We urge you to move forward expeditiously and thank you for this opportunity to offer our comments.

Sincerely,


Wayne N. Hedani
Property Manager
Kapalua Land Company, Ltd.



14-00000-1 (Rev. 1-77)

PALM BEACH FLORIDA

COMMUNICATIONS SECTION
BRIAN K. HINAST

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII 96813-5097



AIR-ET
97-945

August 20, 1997

Mr. Wayne M. Hedani
Property Manager
Kapalua Land Company, Ltd.
1000 Kapalua Drive
Kapalua, Hawaii 96761

Dear Mr. Hedani:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your letter of May 8, 1996 in support of the proposed Kahului Airport Improvements. We appreciate your support for the Proposed Project. The purpose for the Proposed Project is stated in Section 2.1 of the Draft EIS. The impacts on the socio-economical issues are addressed in Section 3.5 and the alien species issue in Section 3.11 of the Draft EIS.

Your letter and this response will be appended to the Final EIS for review by the decision makers.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Weihouse)

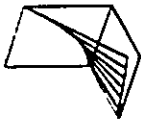
MAY 24 1996

RECEIVED AIR MAIL

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1061 KOKOMO ROAD
HAIKU, HAWAII 96708



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1061 KOKOMO ROAD
HAIKU, HAWAII 96708



PacRim Research Information and Allied Services

- Ecological Research
- Environmental Assessment
- Statistical Analysis
- Systems Modeling
- Database Development and Management

May 22, 1996

David J. Welhouse
Federal Aviation Administration
Airports District Office
Box 30244
Honolulu, HI 96850-0001

Dear Mr. Welhouse,

I have reviewed those portions of the Draft Environmental Impact Statement (DEIS) prepared by the Federal Aviation Administration and the State of Hawaii Department of Transportation Airports Division regarding the proposed improvements at Kahului Airport, Kahului, Maui, Hawaii (viz April 1, 1996 Letter of Howard Yoshioka) which relate to the threat of alien species and the proposed mitigation of this threat.

As a professional wildlife biologist I am acutely aware that invasion of Maui by alien species of plants, animals, insects and diseases is recognized both locally and nationally as a tremendous threat to agriculture, native ecosystems, and human health and well being on Maui and in Hawaii. All available evidence indicates that the improvements at Kahului Airport which are described in the DEIS will dramatically increase the rate of alien species invasion of Maui, with serious consequences the result. This fact is not adequately, or even cursorily, disclosed in the DEIS. Similarly, the measures proposed in the DEIS to mitigate the increase in alien species invasion of Maui which will be caused by the described Kahului Airport improvements are woefully inadequate.

Based on the foregoing, it is clear that the DEIS is entirely inadequate on its face. It should be rejected and prepared anew. The new DEIS should fully disclose and discuss the threat of alien species invasion and present genuine mitigation measures.

Sincerely,
Marc Hodges
Marc Hodges
Wildlife Biologist

internet: marc@hola.net
1061 Kokomo Road, Ha'ikū, Maui, Hawaii 96708 • (808) 573-2267

August 20, 1997

Mr. Marc Hodges
Wildlife Biologist
Pac Rim Research
1061 Kokomo Road
Haikū, Hawaii 96708

Dear Mr. Hodges:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 22, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MH-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

Mr. Marc Hodges
Page 2
August 20, 1997

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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

Mr. Marc Hodges
Page 3
August 20, 1997

AIR-EN
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regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "Mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1525 BERNICE STREET
HONOLULU, HAWAII 96813-5021



RECEIVED
AUG 22 1997



BISHOP MUSEUM
CELEBRATING A
CENTURY OF DISCOVERY

20 May 1996
David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

RE: Maui airport expansion EIS

Dear Mr. Wellhouse:

First, I should introduce myself: I have been studying the insects of Hawaii for over 25 years and have published numerous papers on Hawaiian natural history and impacts of non-native species. For example, see:

Howarth, F.G. & W.P. Mull. 1992. Hawaiian Insects and their Kin. UH Press, Honolulu. 160 pp.
Howarth, F.G. 1985. Impacts of alien land arthropods and mollusks on native plants and animals in Hawaii. pp 149-179. IN: (C.P. Stone & J.M. Scott, eds.) Hawaii's Terrestrial Ecosystems Preservation and Management. CPSU, Univ. of Hawaii, Honolulu.

As a professional entomologist in Hawaii concerned with the well-being of the islands' economy, agriculture, and natural environment, I am deeply dismayed by statements and evident lack of planning expressed in the recent Environmental Impact Statement for the airport expansion on Maui. I also fully support the position and statements made by biologists and managers at Haleakala National Park. Exclusion of National Park personnel and concerns from the EIS deliberations severely undermines the intent of NEPA and the EIS as an objective planning process.

The statement in the EIS that the airport expansion would pose no threat to endangered species is untrue. Non-native species represent the most serious threat to both the natural and economic environments in Hawaii, and the major source of these unwanted colonists is through airports where they arrive as stowaways with passengers and cargo from overseas ports. To expand the Maui airport without including stipulations for increased and effective inspection and other quarantine procedures is irresponsible. Quarantine procedures are a proven technology for mitigating the threats by detection and containment of these unwanted stowaways before they escape into the environment. Not only is the continued existence of Maui's fabulous native species at risk, but also at risk is its agricultural and tourist supported economic base. For example, should any one of several species of biting flies become established on Maui, the tourist industry, along with the airlines they support, would be severely affected. I urge you to revise the EIS to include plans and commitment for adequate quarantine facilities at the Maui airport. I look forward to learning of the required revisions and favorable solution to this issue.

Francis G. Howarth, Ph.D.
The State Museum of Natural and Cultural History
1525 Bernice Street
Honolulu, Hawaii 96817-0916

Dear Dr. Howarth:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 20, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT FGH-1 - National Park Service (NPS) Participation in Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the Federal Aviation Administration (FAA) and the Hawaii Department of Transportation (HDOT), Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment

Sincerely,
Francis G. Howarth
Francis G. Howarth
Entomologist

cc: Owen Miyamoto ✓

The State Museum of Natural and Cultural History
1525 Bernice Street - PO Box 19020A - Honolulu, Hawaii 96817-0916
Telephone: (808) 841-3511 - Fax: (808) 841-8768

See Comments on EIS

Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT FGH-2 - Endangered Species

The potential effects of the Proposed Project on listed and candidate species of plants and animals are discussed in Section 3.11 of the Draft EIS. As indicated in the Draft EIS, the Proposed Project is not expected to have a direct impact on the endangered species within the airport environs. However, as indicated below, the potential effects of the Proposed Project on non-native (alien species) is a separate issue which has been addressed in the Draft EIS (Section 3.11.3) and the Alien Species Biological Assessment.

COMMENT FGH-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior NPS, Department of Interior Fish and Wildlife Service (FWS), and the HDOOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the

Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions, and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared

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Francis G. Howarth, Ph.D.
Page 4
August 20, 1997

by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

We would also like to thank you again for your participation in the Biological Assessment Technical Panel. Your advice and information have been incorporated into the Final Biological Assessment.

COMMENT FGH-4 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. As noted in the Alien Species Biological Assessment, the HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby, benefitting the entire community.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



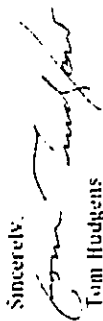
KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

cc: Federal Aviation Administration (D. Welhouse)

1451

I need States citizen and a fellow occupant of this planet to recognize that your Draft EIS is in clear violation of the National Environmental Policy Act and to bring it back to the drafting table as it were with a spirit of responsibility, openness, and honesty

Sincerely,

Tom Hudgens
PO Box 329
Makawao HI 96768
808 572 3483

cc
David J. Wellhouse, Federal Aviation Administration
Office of Environmental Quality Control, State Department of Health

Pukalani, Maui
16 May 1996

Steven M. Amato
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd #700
Honolulu, HI 96819

Dear Mr. Miamoto

My name is Tom Hudgens. I live and work here on Maui as a cook and teacher. I am writing to convey my deep concern for Maui's future in light of the proposed Kahului Airport Expansion Project.

The Draft Environmental Impact Statement for this project, which your agency co-authored, addresses the issue of alien species introduction simply by pointing out the obvious: that this is an existing statewide problem and that there are many potential ports of entry for alien species. In co-authoring the Draft EIS, you have abdicated your responsibility as defined by the National Environmental Policy Act (40 C.F.R. clause 1502.16), to *evaluate* the direct and indirect effects of this Proposed Project on Maui's environment. NEPA defines impacts on natural systems, including ecosystems, as indirect effects (40 C.F.R. clause 1508.8).

A mere fifteen miles of cane and pineapple fields, eucalyptus groves, farmland and other hospitable natural terrain lay between the Kahului airport and Haleakala National Park. The Park contains more endangered species than any other site in the National Park System. It is clear that direct international flights landing on Maui will further endanger them, a single alien species could cause untold damage to many, many native species and the systems that support them. The proximity of the airport and the Park would demand that the EIS painstakingly lay out details of stringent inspection and quarantine facilities, but there again your Draft EIS also fails. It mentions the need for such control measures (p.8-8), but offers no particulars.

What is perhaps most reprehensible is the fact that you *expressly did not allow* the National Park Service to participate in the environmental review process for this Proposed Project.

This kind of cowardice smacks of the back-room deals and greased palms for which Hawaii is unfortunately notorious. I urge you, as a Hawaii citizen, as

See Comment TH-1

See Comment TH-2

See Comment TH-3

See Comment TH-4





STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1545 KUAHONOULI DRIVE
HONOLULU, HAWAII 96813-5097

DEPARTMENT OF TRANSPORTATION
ATTENTION: AIR-EN
BRUCE K. MINDEL

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Mr. Tom Hudgens
Page 2
August 20, 1997

AIR-EN
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the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 11.1.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including

Mr. Tom Hudgens
P. O. Box 324
Makawao, Hawaii 96768

Dear Mr. Hudgens:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 16, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT TH-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 1.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding

information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT TH-2 - Effect of Proposed Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, are in the process of preparing a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment will be prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent will be identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT TH-3 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.1. International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and

foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. Airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT TH-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Mr. Tom Hudgens
Page 5
August 20, 1997

AIR-EN
97.902

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Weihouse)



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
465 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5097

AIR-EN
97-714

August 20, 1997

Claire K. Hughes
1926 Awapuhi Street
Honolulu, Hawaii 96822
May 10, 1996

Mr. Jerry Matsuda, Acting Administrator
Airports Division
Hawaii State Dept. of Transportation
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Dear Mr. Matsuda:

Enclosed is a copy of my letter to Mr. Wellhouse, of the Federal Aviation Administration, expressing my opposition to expansion of the Kahului airport without insurance against further destruction of Hawaii's unique ecosystem and environment. The cost of destruction of Hawaii's native plants and animals, as a result of inadequate protection, has been enormous and extraordinary measures must be taken to insure against continuation of that vicious cycle.

Please identify for me what role the State of Hawaii plays in the process of planning for the airport expansion and assuring the citizens of Hawaii that progress will not continue to eliminate treasures of nature that cannot be replaced. The current threat from importation of the Brown Tree Snake from Guam is a serious, and that is but one example of potential danger to Hawaii. I would like to know what precautions are being taken and what plans are being made by the FAA to assure no further destruction to Hawaii's ecosystem is fostered by expansion of the Kahului airport.

Sincerely,

Claire K. Hughes

Claire K. Hughes

cc: The Honorable Senator Daniel K. Akala
The Honorable Senator Daniel K. Inouye

Ms. Claire K. Hughes
1926 Awapuhi Street
Honolulu, Hawaii 96822

Dear Ms. Hughes:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 10, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT CKH-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.1.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding

Comment CKH-1
Introduction of Alien Species

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the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of

50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT CAH-2 - State's Role in Planning

The State of Hawaii is the owner and operator of Kahului Airport. The actual administration of the facilities, including the operation, planning, design and construction of Kahului Airport is under the jurisdiction of the HDOT, Airports Division. In addition, the FAA provides funding for airport projects, and, therefore, the HDOT will follow the FAA rules and regulations.

The HDOT, Airports Division, will initiate the planning for the Airport through a Master Planning process which includes public input from a Technical Advisory Committee and through a series of Public Information Meetings. The Technical Advisory Committee includes representatives from the Airport users, Airport tenants, local businesses, local community organizations, and elected officials. The information, ideas, and concerns from these public meetings are considered in the planning process, as it was for Kahului Airport. The Master Planning process results in a Recommended Master Plan.

Once the Master Plan is completed, the HDOT will perform an environmental analysis through an Environmental Assessment (EA) or an EIS per the Hawaii Revised Statutes, Chapter 34. Similarly, if Federal funds are to be used in the project, the FAA will need to perform an environmental analysis which would be pursuant to the National Environmental Protection Act. Upon acceptance of the EA or EIS, and the appropriate approvals and funding are obtained, the project will go forward for construction.

Due to the dynamic nature of airports, in general, the Master Plans are reviewed and usually updated as necessary. Also, if the aviation traffic or other factors change drastically, a Master Plan update will be initiated. An overview of the recent planning process for Kahului Airport, including the project history, and public participation is presented in Section 1.1, 1.2 and 1.3 and the Draft EIS.

COMMENT CKH-3 - Precautions Taken

For the Kahului Airport Expansion, we are in the process of preparing a Joint EIS for both the HDOT, Airports Division, and the FAA. Therefore, this EIS is being prepared pursuant to both the Hawaii Revised Statutes, Chapter 343 and the National Environmental Protection Act. As a result of meetings with the NPS and the FWS and as stated above, the FAA and HDOT are in the process of preparing a Biological Assessment in cooperation with the FWS.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Handwritten text, possibly a list or sequence of characters, oriented vertically on the left side of the page.



KAHULUI AIRPORT
IMPROVEMENTS
CALVIN O. OMAHO
Brian K. Minnai

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097



August 20, 1997

P.O. Box 2534
Wailuku, Hawaii 96793
May 16, 1998

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, The National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,

Brian K. Minnai
Binger Ikenberry

c: DOT - Airports Division
c: DOH - Office of Environmental Q.C.

Ms. Ginger Ikenberry
P. O. Box 2534
Wailuku, Hawaii 96793

Dear Ms. Ikenberry:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 18, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT GI-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT GI-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.1.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the

biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT GI-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, and has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT GI-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an

Increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts.

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

Ms. Ginger Ikenberry
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implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT GI-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT GI-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result

Ms. Ginger Ikenberry
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of the Proposed Project. The Proposed Project, when compared to the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT GI-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Sprackelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and mitigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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May 20, 1990

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, the National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,

Sandra Duarte Jackson

c: DOT - Airports Division
o: DOH - Office of Environmental Q.C.

AIR-EN
97.709

Ms. Sandra Duarte Jackson
Mailing Address Unknown

Dear Ms. Jackson:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 20, 1990 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT SDJ-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL

SDJ-1
See Comment
SDJ-1 & SDJ-2
SDJ-3
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SDJ-6 & SDJ-7

has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interisland international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT SDJ-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the

Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be

Included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT SDJ-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT SDJ-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by

extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in HDOOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT SDJ-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the Island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT SDJ-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the Proposed Project. The Proposed Project, when compared to the No-Action Alternative, creates measurable positive impacts at

certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.


COMMENT SDJ-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and avigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

Queen Muiyamoto
 Dept. of Transportation - Airports
 Honolulu International Airport
 400 Rodgers Blvd. # 700
 Honolulu, HI 96819

1597



Dear Sirs -
 We have lost so much -
 that is rare and precious in
 Hawaii! Can you NOT ONCE say NO to
 engineering interests and help protect both our
 life quality and threatened species in Haleakala
 National Park? The Park, as you know, is
 already in an unprotected state; mosquitoes and
 malaria - both introduced species - are found at
 ever higher altitudes threatening our native
 birds who's roost up the fern forests, and
 microclimate is smothering the jungles. We're
 not enough on our hands! HOW CAN YOU
 POSSIBLY CONSIDER further burdening our
 nature ecosystem beloved by residents and
 tourists alike? As local volunteers labor
 to control the existing alien species you
 are actually considering making it EASIER

See Comment K1-1 and K1-2

See Comment K1-3 and K1-4

to introduce pests such as the EXTREMELY
 POISONOUS brown tree snake (which attacks
 small children as well as native fauna on
 Guam). Let Oahu be the well-guarded
 gateway to the islands and the just line
 of defense and GIVE MAUI A CHANCE.
 Please listen to the voice of the residents
 of Maui County (not self-serving interests
 of people imported by the labor unions
 from other islands or the mainland to
 appear at hearings on their matching outfits!)
 We urge you to REJECT the current ~~ETS~~ for
 Kahului Airport presided by vested interests -
 being in the Park Service and Maui Residents.

Please look into your heart and let
 THE (last) BUCK stop here! "Va mau ke
 ea o ka iou a ka pono" - and you know
 the right thing is NO AIRPORT EXPANSION.
 Just this once - keep the dough
 Karen Jennings

DEPARTMENT OF
TRANSPORTATION
AIRPORTS DIVISION

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Copy to David Wellhouse



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
860 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

PAULIYAKAMA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII
Brian K. Mineai

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Ms. Karen Jennings
Page 2
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with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT KJ-3 - Native Ecosystems

The potential effects of the Proposed Project on biotic communities is discussed in Section 3.11 of the Draft EIS. In brief, the Proposed Project will result in the loss of Cane Field/Ruderal Border, Koa Haole/Mixed Understorey, and some Open Grassland vegetative zones. These vegetative zones are primarily habitat for introduced bird species. Similarly, the Proposed Project will affect feral mammals that inhabit the agricultural areas where the parallel runway will be constructed. The feral mammals are also introduced species.

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

Ms. Karen Jennings
P. O. Box 462
Haleakala, Hawaii 96708

Dear Ms. Jennings:

Subject: Comments on Draft Environmental Impact Statement (EIS) of Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter on the Draft EIS for the Proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT KJ-1 - Quality of Life

Quality of life is highly subjective and this concept varies for each individual. The Proposed Project is in keeping with the transportation and tourism goals and objectives of the State and County as outlined in the State Plan and Maui County General Plan. These plans take into consideration the quality of life for the majority of residents and visitors to Hawaii. The social impacts of the Proposed Project in discussed in Section 3.5 and 3.6 of the Draft EIS.

COMMENT KJ-2 - Haleakala National Park

The Hawaii Department of Transportation (HDOT), Airports Division, has been working in cooperation with Department of Interior National Park Service (NPS), as well as the Department of Interior Fish and Wildlife Service (FWS), other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the Federal Aviation Administration (FAA) and HDOT, Airports Division, have prepared a biological assessment in cooperation

Ms. Karen Jennings
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August 20, 1997

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discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

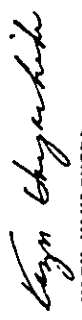
The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will not directly impact the marine environment and there will be insignificant or no effects on water quality or runoff.

COMMENT KJ-4 - Introduction of Alien Species

Please refer to the response to Comment KJ-3, above.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Ms. Karen Jennings
Page 3
August 20, 1997

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact with the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been

125c

April 30, 1996

Owen Miyamoto
Department of Transportation Airports
Honolulu International Airport
400 Rodgers Blvd #700
Honolulu, HI 96819

Dear Mr. Miyamoto:

Please see enclosed letter to Mr. Wellhouse regarding expansion of the Kahului Airport.

Very truly yours,

Thomas M. Jike
Thomas M. Jike
99-032 Kauhale Street
Aiea, HI 96701

enc.

April 30, 1996

David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

As a permanent, local resident of Hawaii and taxpayer-citizen, I am writing to express my concerns over the issue of introducing non-native species that may result from the expansion of the Kahului Airport, an issue which is not adequately addressed in the Environmental Impact Statement (EIS) completed by the FAA and Hawaii Department of Transportation.

Although the FAA has indicated its belief that the airport expansion poses no threat to endangered species, it is clear that dozens of alien species do arrive in Hawaii every year often on international air connections through Honolulu International Airport. All this, despite screening and quarantine processes.

How can the FAA support its belief in the face of clear experience to the contrary and the lack of inspection and quarantine procedures for Kahului airport? If international flights start landing without alien species detection procedures, a biological disaster to Haleakala National Park is only a matter of time.

I believe the National Park Service should be included in discussions of the risk of introducing non-native species posed by the expansion of Kahului Airport. I also believe, the risk has not been adequately addressed in the EIS and steps have to be taken to correct that oversight.

Sincerely yours,

Thomas M. Jike
Thomas M. Jike
99-032 Kauhale Street
Aiea, HI 96701

copy: Owen Miyamoto, Department of Transportation, Airports

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STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

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DEPARTMENT OF TRANSPORTATION
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Mr. Thomas M. Jike
Page 2
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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies.

Mr. Thomas M. Jike
99-032 Kaunale Street
Aiea, Hawaii 96701

Dear Jike:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of April 10, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT TMJ-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

Mr. Thomas M. Jike
Page 3
August 20, 1997

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97-907

This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT TMJ-2 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

COMMENT TMJ-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien

Mr. Thomas M. Jike
Page 4
August 20, 1997

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species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Handwritten text, possibly a list or index, oriented vertically on the left side of the page.



Testimony: RE: Expansion of the runway at Kahului airport.

Members of the Maui County Council, my name is Christine Kafka and I live here on the Island of Maui. For several years I taught in the public school system here. I now do social work, helping victims of domestic violence find alternative ways of dealing with their anger. I run groups for children, to help heal the impact of violence in their homes, so that they do not grow up to be abusers.

I am here today because I have seen and felt the impact that the increasing visitor industry, in it's present management, has had on the resident population of Hawaii. Many residents are forced to work two jobs to try to make ends meet. They have no time left to enjoy leisurely with their families. Many are pushed to despair by their inability keep up with the rising cost of living. There is increasing disconnection from the land and the lifestyle which includes fishing, and growing one's own food. Meanwhile, visitors lay on the beautiful Hawaiian beaches, sipping Mai Tais and cruising aboard yachts looking for whales. The money spent at hotels does not stay in Hawaii, but feeds into multinational corporations, while Hawaii's people cannot afford the price of fish. We need to carefully reevaluate the impact of unbridled growth on our already overtaxed infrastructure, and on the people who live here.

Maui still has some remaining natural places which are exquisitely beautiful. This includes the majesty of the rainforest. Yet this environment is fragile and susceptible to the introduction

See Comment CK-1

See Comment CK-2

of alien species, as has occurred in so many other places on the planet which were once very beautiful also. There is a sense of sacredness about the land in it's undisturbed state, a sacredness that causes one to reevaluate the reason for living and question whether the acquisition of material wealth at the expense of sustainability is buying poverty of the soul. There is an increasing movement among certain people in the industrialized world to be deliberately downwardly mobile, to live a lifestyle that does not use more than we need, and to give back more than we take. I would like to see the management of Maui County incorporate some of these values into the planning for this island community. For these reasons I am opposed to expanding the runway and increased internationalization of the Kahului Airport.

See Comment CK-2

See Comment CK-2

*Christine Kafka
P.O. Box 900
Hau'ku, Maui 96708*



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAHULUI AIRPORT
IMPROVEMENTS
CLEMENT ORLANDO
BRIAN K. MIKAMI

REPLY BY REGISTERED
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Ms. Christine Kafka
Page 2
August 20, 1997

AIR-EN
97.1233

Ms. Christine Kafka
P. O. Box 906
Haiku, Hawaii 96708

Dear Ms. Kafka:

Subject: Testimony on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your testimony of May 8, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your testimony, which is attached for reference.

COMMENT CK-1 - Growth Impacts

The growth inducing impacts of both the Proposed Project and International flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the State of Hawaii, Department of Transportation's (HDOT's) "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT CK-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding

the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information

Ms. Christine Kafka
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was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and in the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT CK-3 - Internationalization

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. Please refer to attachment "international flights."

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the

Ms. Christine Kafka
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HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

PAZIYASADIA
1981-1982
GLENDA UNKOWITZ
Brian K. Minazi



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Hans M. Kanuha
RR1 Box 155
Waihee Valley Road
Wailuku, Hawaii 96793

Dear Mr. Kanuha:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT EHK-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL

ENCLOSURE (ATTACHED)

Hans M. Kanuha
RR #1 Box 155
Waihee Valley Road
Wailuku, HI 96793

May 20, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 90850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, the National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,

c: DOT - Airports Division
r: DOH - Office of Environmental Q.C.

See Comment
EIS-1 & EIS-2

See Comment
EIS-1 & EIS-2

See Comment
EIS-1 & EIS-2

has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT HMK-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the

Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be

Included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "Mitigation measures")

COMMENT HMK-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT HMK-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by

extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts.

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

Mr. Hans M. Kanuha
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implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT HMK-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT HMK-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the Proposed Project. The Proposed Project, when compared to

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the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT HMK-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville Community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and aviation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

MAY 3 1996

INFORMATION CENTER



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
868 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

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MAY 14 1996
BRIAN K. MINAGI

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MAY 14 1996
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April 29, 1996

David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:
Re: Airport Expansion on Maui

The recently completed environmental impact statement (EIS) fails to adequately address the most serious issue raised by expanding Kahului Airport: the risk of introducing non-native species. This is unacceptable. In fact, your agency has indicated its belief that airport expansion would pose a threat to endangered species.

The EIS fails to establish inspection and quarantine procedures for the airport. If international flights start landing without such procedures, the chance for non-native species introduction is multiplied immeasurably.

The Federal Aviation Administration and Hawaii Department of Transportation, as joint authors of the EIS, have excluded the National Park Service from discussions. The Park Service is our steward of the land and resources of Haleakala; its absence from the process makes the conclusions of the EIS suspect, at best.

Your sincere consideration of the above points will be greatly appreciated.

Very truly yours,
Sheila Kawai
410 Magellan Ave. #807
Honolulu, HI 96813

cc: Owen Miyamoto
Dept. of Transportation, Airports, Honolulu International Airport
400 Rodgers Blvd. # 706 Honolulu, HI 96819

Ms. Sheila Kawai
410 Magellan Ave. #807
Honolulu, Hawaii 96813

Dear Ms. Kawai:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of April 29, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT 8X-1 - Introduction of Alien Species

The alien species issue is summarized in Sections J.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

Comment SR-3

Comment SR-1

Comment SR-2

Comment SR-7

Comment SR-8

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the

FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT BK-2 - Inspection and Quarantine Facilities

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT BK-3 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be

Ms. Sheila Kawai
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authorized by exemption under the so-called Citiles Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. (See attachment "international flights")

COMMENT 8K-4 -- NPS Participation in Preparation of Draft EIS


We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Ms. Sheila Kawai
Page 5
August 20, 1997

AIR-EN
97.942

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.
Very truly yours,


KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above
c: Federal Aviation Administration (D. Welhouse)

DOCUMENT CAPTURED AS RECEIVED

MAY 22 1997

IN HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
865 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5097

KAUAIANALANI
HONOLULU
TELEPHONE
GUYANA OWEN
Brian K. Minasi

WILSON AVENUE
AIR-EN
96.495

August 20, 1997

Mr. Ian P. Kinnear
305 Paahi
Paia, Hawaii 96779

Dear Mr. Kinnear:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT IFK-1 - National Park Service (NPS) Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the Federal Aviation Administration (FAA) and the Hawaii Department of Transportation (HDOT), Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Daniel Wellhouse
FAA

Dear the wellhouse,

wellhouse was the National Park Service kept out of the EIS preparation?

They have (NPS) raised legitimate arguments that are not mitigated - a keyed possibility.

Summary
C Ian Kinnear

P.S. Until all issues are on the table, I am against any further work on this runway.

The Maui County General Plan theoretically addresses concerns about agricultural lands, conservation and open space, and native ecosystems; however, the implementation measures are missing. Maui Tomorrow continues to work for the relevant programs and ordinances, and until the community has them, the community is not ready for additional growth and development strators.

"It's quality of life, silly!" Last year, Money magazine ranked Honolulu only the 102nd best place to live in the nation. How can that be? Don't they have a really long runway and an international airport? Don't they have millions of tourists pumping billions of dollars into the economy every year? Don't they have drugs and gangs, violent crime (including brutal robberies of tourists, and hosts of drunks, traffic, and pollution in abundance?

Maui is unprepared to handle the strators that a long-throated runway will induce. During the decade 1980-1990, Maui's population grew by more than 60% and the results are obvious. We appreciate that many people need work and we suggest that they could be put to work improving Maui's quality of life, rather than providing the means to stress it.

MAUI COUNTY GENERAL PLAN

COMMENT NO. IPK-2 - Maui County General Plan

The relationship of the Proposed Project to the Maui County General Plan is discussed in Section 2.3.1.3 of the Draft EIS. As indicated, the General Plan objectives relevant to the Proposed Project include the following:

Economic Objectives:

- To provide an economic climate which will encourage controlled expansion and diversification of the County's economic base;
- To provide a balance between visitor industry employment and non-visitor employment for a broader range of employment choices for the County's residents.

Transportation Objectives:

- To support an advanced and environmentally sensitive transportation system which will enable people and goods to move safely, efficiently, and economically.

The Proposed Project will meet Maui County General Plan's objectives by accommodating an economic climate which will support Maui's needs for the encouragement of controlled expansion and diversification of the County's economic base. Specifically, by accommodating the forecast air carrier service to destinations outside the State of Hawaii, the County will be able to reduce its reliance on traditional markets and plan strategically for its economic future. The Proposed Project is one of the many implementation measures required for the County to meet the goals and objectives of the General Plan.

COMMENT NO. IPK-3 - Social Impacts of the Proposed Project

The socio-economics of the Proposed Project are discussed in Section 3.5 of the Draft EIS. In general, the analyses conducted indicated the Proposed Project would have insignificant impacts on the direct and induced socio-economic environment of Maui.

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS:

Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SCAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

While it is true that almost all communities have social problems of one type or another and to varying degrees, there is no evidence to indicate that the provision of safe and efficient airport facilities are the cause of those problems. As indicated above, the new employment market opportunities that will be made available by the Proposed Project will be means of alleviating

and minimizing social problems caused by underemployment and reduced incomes.

COMMENT NO. IFK-4 - Quality of Life

Quality of life is a highly subjective issue and, whereas a given project or situation may be viewed as some as a decrease in quality of life, others may view that project or situation as a means to improve their quality of life. The Proposed Project, as indicated previously, is intended to promote accomplishment of the goals and objectives of the Maui County General Plan, as well as the Hawaii State Plan and State Transportation and Tourism Functional Plans. These plans have been formulated to improve the general quality of life for all residents of and visitors to Hawaii.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: AS noted above

c: Federal Aviation Administration (D. Weihouse)

To: Owen Niyemoto Airports Administrator
Dept. of Transportation
400 Rodgers Blvd. Suite 700
Honolulu, HI 96819-1880

Kathleen Klett
P. O. Box 354
Haiku, HI
96708

Dear Sir,

I would like to register my comments regarding the most recent draft of the Kahului Airport Environmental Impact Statement.

The most amazing observation is that 22 pounds of paper with thousands of words can say so little about the subjects it is supposed to cover. So many 'impacts' are dismissed and explained away in such a careless fashion that one can only conclude you folks are trying to avoid confronting the very real problems which will come along with a larger runway at Kahului. You have managed to do a real disservice to the people of Maui County.

I want to know what the contingency plans are right now, today, if and when the proposed pipeline running through Kanaha Pond ruptures and leaks. The fact that it will be buried is disturbing as leaks will take longer to discover. The most recent event on Oahu at Pearl Harbor was a catastrophe narrowly avoided. I don't see that kind of response available to Maui County. (These 'Phases' need to be looked at as a whole- don't try the excuse that you don't need to consider this because it's in Phase 3).

I want to know where the enclosed building is located now, today, where our Agricultural inspectors can inspect incoming containers for alien insects, animals and species from foreign and mainland destinations

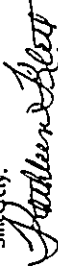
I want to know where, today, the hospital facilities are located to handle any major (or minor, for that matter) accidents at Kahului Airport. Maui Memorial is not that place.

I want to know how our social services, police department and the general population of Maui are going to cope with the problems resulting from increased drugs coming straight to Maui from Southeast Asia. Where is the Customs Building?

I want to know that road improvements are already made before any more expansions to the runway. I don't think the State has a right to carelessly create problems on the neighbor islands. Improvements to roads around the airport are ludicrous without improvements across the entire island.

The DEIS you have prepared concentrates solely on the perimeter of the airport. It does not address real problems outside that perimeter and in not addressing those real problems you have created a totally bogus document that really means nothing. You have wasted taxpayers dollars once again. I think it's time to go back to the drawing board and give us some real answers and solutions to the problems you are going to create by expanding the runway at Kahului. Quit trying to explain away and start THINKING about real solutions and possibilities. And, if you can't come up with the answers then quit wasting our money and forget the whole project. Three International Airports (and you KNOW Kahului is destined to be International) within a hundred miles of each other is overkill and ridiculous. We shouldn't have to lock-step in the footprints of Oahu just because it is in your plans. Let's face it, Oahu is a mess on a massive scale.

Sincerely,



Kathleen Klett

See Comment KK-1

See Comment KK-2, KK-3, KK-4, KK-5 and KK-6

See Comment KK-7

See Comment KK-8

HELEMANU J. CATELMO
1/21/1997



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAHULUUI/KAHUNA
MAIL STOP
REPLY TO THIS OFFICE
CLERK (KAWAHOE)
Brian K. Mizaal

KAHULUUI/KAHUNA
AIR-EN
97.1048

Ms. Kathleen Klett
Page 2
August 20, 1997

AIR-EN
97.1048

purpose of the proposed fuel pipeline is to reduce dependence on the fleet of fuel tanker trucks which currently convey fuel to the Airport from storage facilities at Kahului Harbor. These trucks must travel along Hana Highway, Haleakala Highway, Kala Road and Eena Street to reach the Airport. Once the trucks arrive at the Airport, they must carry fuel cargo across Runway 2-20 to reach the air carrier aircraft parking apron adjacent to the passenger terminal. This requires clearance from the Federal Aviation Administration (FAA) Air Traffic Control Tower. It is generally accepted that fuel pipelines provide safer, more environmentally sound fuel conveyance system than that provided by tanker trucks traveling along public roads and across runways.

Due to the long-term, speculative nature of the fuel pipeline from Kahului Harbor to the Airport Storage Tanks, the EIS can only discuss potential impacts of this project in general terms. If and when the pipeline project is considered for construction, additional environmental documentation is required.

COMMENT KK-2 - Agricultural Inspectors

The location of the new cargo building which will house both federal and state agricultural inspectors is shown on Figure 2-9, Proposed Project, of the Draft EIS. As indicated, the new cargo building will be located to the southwest of the existing passenger terminal. The Hawaii Department of Transportation (HDOT), Airports Division, is committed to allowing both the federal and state agricultural inspectors to be involved with the planning and design of the new building so that the proper equipment and facilities for improved inspections are included in the new building. (See attachment "mitigation measures")

COMMENT KK-3 - Hospital Facilities

The potential effects of the Proposed Project on the health care facilities of Maui are discussed in Section 3.22.5 of the Draft EIS. As indicated in the Draft EIS, the Proposed Project is expected to have insignificant effects on the health care facilities of the island.

COMMENT KK-4 - Socio-economic Effects of the Proposed Project

The socio-economic impacts of the Proposed Project are fully discussed in Section 3.5 of the Draft EIS. As indicated in the Draft EIS, the socio-economic effects of the Proposed Project are expected to be insignificant or positive.

Ms. Kathleen Klett
P. O. Box 354
Haiku, Hawaii 96708

Dear Ms. Klett:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT KK-1 - Fuel Line

The potential impacts of the proposed alignment of the pipeline from Kahului Harbor to the Airport Bulk Fuel Tanks, as well as mitigation measures to minimize those impacts, are discussed in the following sections of the Draft EIS: Section 3.4 (Geology, Physiography, Soils, Agricultural Potential and Earthquakes); Section 3.8 (Water Quality); Section 3.10 (Historical, Architectural, Archaeological and Cultural Resources); Section 3.13 (Hydrology Floodplain Management and Drainage); and Section 3.20 (Solid Waste, Hazardous/Toxic Waste and Waste Wash Water).

If and when the fuel pipeline is constructed, it will be installed and operated by the Airline's fuel consortium, the Hawaii Fueling Facilities Corporation. As currently proposed, the pipeline would be aligned on the ocean side (north) of Kanaha Pond. Given this location, there is a potential for a significant impact on Kanaha Pond and coastal water quality should a leak or line break occur. However, the pipeline will be designed to include a "quick flush" system, double walled pipes and leak detection sensors to minimize this risk. The primary

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred

despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please

Ms. Kathleen Klett
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August 20, 1997

AIR-EN
97.1048

consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT KK-5 - Effect of Proposed Project on Police Services

The potential effects of the Proposed Project on police services are discussed in Section 3.22.4 of the Draft EIS. As indicated in the Draft EIS, the potential effects of the Proposed Project on police services are expected to be insignificant. The Maui Police Department has taken the Proposed Project into consideration in their planning and will provide the staff level required as service levels increase.

COMMENT KK-6 - Location of Customs Building

Direct international flights requiring customs, as well as immigration service inspections, are not forecast to occur within the planning horizon for the Proposed Project. Should these services be required in the future, appropriate facilities, in or near the passenger terminal building will be provided.

COMMENT KK-7 - Roadway Improvements

The proposed roadway improvements associated with the Proposed Project are described in Section 2.4.8 of the Draft EIS. As discussed in the Draft EIS, several roadways in the immediate vicinity of the airport will be improved. These roadways include the airport access road and Hana Highway, in addition to the improvements that will be made to the airport roadway system.

COMMENT KK-8 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in

Ms. Kathleen Klett
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AIR-EN
97.1048

limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

PAJIMASACIA
1988, Ltd.

REPLYING OFFICE
GENERAL MANAGER
Brian A. Minasi

REPLYING OFFICE
AIR-EN
97-939



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

RETURN TO (AIR MAIL)
STATE OF HAWAII

Grand Wailea Resort
HOTEL & SPA

3550 Wailea Alanui, Wailea, Maui, Hawaii 96753
Phone: (808) 875-1234 Fax: (808) 874-5143

June 24, 1996

Mr. Dave Welhouse
Federal Aviation Administration
Honolulu International Airport
Honolulu, HI 96813

Dear Mr. Welhouse:

Aloha from the Grand Wailea Resort, Hotel & Spa.

The airport expansion currently being discussed for Kahului, Maui is important to Maui's economy. We believe the long range benefits far outweigh the short-term inconveniences that may occur initially.

I, too, believe we need to keep Hawaii from becoming too crowded and busy. I also believe the competition for economic success makes it impossible to not extend the runway. Please do your best to pass this runway extension and bring Maui up to speed with our competition.

Mahalo nui loa,

GAK
Gregory A. Koesterling
Executive Vice President
& Managing Director

GAK/mcl

cc: Mr. Jerry Matsuda, Airports Director

Mr. Gregory A. Koesterling
Executive Vice President and Managing Director
Grand Wailea Resort Hotel & Spa
3850 Wailea Alanui
Wailea, Maui, Hawaii 96753

Dear Mr. Koesterling:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your letter of June 20, 1996 in support of the proposed Kahului Airport Improvements. We appreciate your support and are continuing to move forward with the Proposed Project. Your letter and this response will be appended to the Final EIS for review by the decision makers.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

cc: Federal Aviation Administration (D. Welhouse)

1514

DEPARTMENT OF TRANSPORTATION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
860 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAHULUI AIRPORT
IMPROVEMENTS
PROJECT
STATE OF HAWAII
BRIAN K. MINAHI
AIR-EN
97-823

August 20, 1997

Makawao, Maui
17 May 1996

Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd. #700
Honolulu, HI 96819

Dear Mr. Miyamoto:

My name is Janie Kunin. With my husband Neal, I own and manage a cafe here in Makawao. I have lived here for over twenty-five years. I am writing to express my opposition to the proposed Kahului Airport Expansion Project, and to urge a revision of the inadequate Draft Environmental Impact Statement, co-authored by the Airports District Office of the Federal Aviation Administration and the Hawai'i Department of Transportation.

I derive a great measure of solace from knowing that I live in close proximity to a diverse array of relatively pristine natural habitats for many unique and beautiful species. This Project, as proposed, will put these fragile habitats in a state of permanent jeopardy.

Haleakala National Park is not only one of Hawaii's crown jewels, it is surely one of the most beautiful, awe-inspiring places on Earth. The demise of tropical rain forests and the resulting loss of untold species is now a well-known fact in America, but how many U.S. citizens realize there is a well-preserved piece of it right here in the United States that is now being threatened? Haleakala holds more endangered species than any other National Park, yet there is no barrier of any kind between it and the airport.

In my work I have the daily opportunity to meet and speak with visitors from all over the world. I never tire of hearing them describe Maui as "truly unique," "unspoiled," or "off the beaten path." This Proposed Project will certainly diminish these cherished qualities, directly and indirectly. I urge your agency to consider why people come specifically to Maui, what it is about our island that attracts visitors.

I urge a thorough revision of the Draft EIS, in which all the possible implications regarding the threat of alien species, the airport's proximity to the Park, and the question of Maui's uniqueness are thoroughly analyzed and considered.

Thank you very much.

Janie Kunin
PO Box 1736
Makawao, HI 96768
1808-572-1477

cc: Office of Environmental Quality Control, State Department of Health
David J. Wellhouse, Federal Aviation Administration

Ms. Janie Kunin
P. O. Box 1736
Makawao, Hawaii 96768

Dear Ms. Kunin:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 17, 1996, on the Draft EIS on the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT JK-1 - Impact of Proposed Project on Ecosystems

The potential impacts of the Proposed Project on the terrestrial ecosystems of Maui are discussed in Section 3.11 of the Draft EIS. As indicated, based on the flora and fauna surveys conducted for the Proposed Project, as well as the expert analyses by our experienced consultants, the Proposed Project will have insignificant effects on the terrestrial flora and fauna of the island.

COMMENT JK-2 - Endangered Species

The potential impacts of the Proposed Project on endangered species is also discussed in Section 3.11 of the Draft EIS. As indicated, the Proposed Project will not adversely affect threatened and endangered species within the airport environs or those outside the immediate vicinity of the airport. One of the potential effects on threatened and endangered species could arise from the introduction of alien species as a result of the Proposed Project.

Ms. Janie Kunin
Page 2
August 20, 1997

AIR-EN
97.823

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the

Ms. Janie Kunin
Page 3
August 20, 1997

AIR-EN
97.823

Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1522

IN REPLY PLEASE REFER TO
AIR-EN 97-824



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

17 May 1996

Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd. #700
Honolulu, HI 96819

Dear Mr. Miyamoto:

My name is Neal Kunin. With my wife Jenie, I own and manage a cafe here in Makawao. I have lived here for ten years. I am writing to express my opposition to the proposed Kahului Airport Expansion Project, and to urge a revision of the inadequate Draft Environmental Impact Statement, co-authored by the Airports District Office of the Federal Aviation Administration and the Hawaii Department of Transportation. In these past ten years, no development proposal on this island has concerned me as much as this one.

Haleakala National Park, in its current, relatively unspoiled state, is absolutely crucial to our visitor industry. The demise of tropical rain forests and the resulting loss of untold species is now a well-known fact in America, but how many U.S. citizens realize there is a well-preserved piece of it right here in the United States that is now being threatened? Haleakala holds more endangered species than any other National Park, yet there is no barrier of any kind between it and the airport. In my work I have the daily opportunity to meet and speak with visitors from all over the world. I am always proud when I hear them describe Maui as "truly unique," "unspoiled," or "off the beaten path." This Proposed Project will certainly diminish these cherished qualities: it threatens the delicate habitats in Haleakala National Park and other pristine ecosystems, and it threatens Maui's uniqueness.

Unfortunately, I realize I probably do not speak for all my fellow Maui business owners in protesting this Airport Expansion Project. I am afraid that many of them cannot look past the projected increase in the number of visitors and the resulting increase in the number of dollars. I deplore this short-sightedness. I urge your agency to consider why people come specifically to Maui, what it is about our island that attracts visitors. I know many visitors who return year after year to Maui, never having set foot on Waikiki. With an international airport, a cloverleaf interchange at the bottom of the Haleakala highway, more traffic, wider highways, an agglomeration of new hotels and shopping centers, and a constant stream of ecological crises, I have no doubt that these longtime visitors will stop coming to Maui. Our island, no longer unique, will cease to attract unique visitors.

I urge a thorough revision of the Draft EIS, in which all the possible implications regarding the threat of alien species, the airport's proximity to the Park, and the important question of Maui's uniqueness are thoroughly analyzed and considered.

Thank you very much.

With aloha,

Neal Kunin
PO Box 1736
Makawao, HI 96768
(808) 572-1477

cc: David J. Wetthouse, Federal Aviation Administration
Office of Environmental Quality Control, State Department of Health

FAKUMAKAHEKA
HONOLULU

IF YOU HAVE ANY
QUESTIONS

PLEASE CONTACT

Brian K. Minnai

IN REPLY REFER TO

AIR-EN
97-824

August 20, 1997

Mr. Neal Kunin
P. O. Box 1736
Makawao, Hawaii 96768

Dear Mr. Kunin:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 17, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT NR-1 - Purpose and Need for the Proposed Project

The purposes and need for the Proposed Project are described in Section 2.3 of the Draft EIS. As indicated, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State, and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passengers and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT NR-2 - Effect of Proposed Project on Haleakala National Park

The Hawaii Department of Transportation (HDOT), Airports Division, has been working in cooperation with National Park Service (NPS), as well as the Department of Interior Fish and Wildlife Service (FWS), other State agencies and private groups

regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the Federal Aviation Administration (FAA) and HDOT, Airports Division, are in the process of preparing a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment will be prepared in order to determine the potential impact of the runway extension (of the proposed project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT NR-3 - Potential Population Growth

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not

part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth

inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT MK-4 - Potential Effects of Proposed Project on Infrastructure

The potential effects of the Proposed Project on the airport area infrastructure are discussed in detail in Section 3.22 of the Draft EIS. Additionally, a detailed analyses of the infrastructure requirements for Kahului Airport is presented in Appendix L to the Draft EIS. A traffic impact report is presented in Appendix M and P, and an aviation safety analysis is presented in Appendix N.

In general, based on the various analyses performed, the Proposed Project will have positive, insignificant or negligible effects on the water and wastewater systems, telecommunications systems, police, fire and security services, health care services, schools, and recreational facilities of the island. Similarly, for the most part, the proposed roadway improvements will result in positive effects on the roadway system in the vicinity of the airport. There will be significant traffic effects at some intersections, but these effects will occur with or without the Proposed Project as a result of natural growth of the island.

COMMENT MK-5 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes

the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the MPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

Mr. Neal Kunin
Page 6
August 20, 1997

AIR-EN
97-824

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (800) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Ms. Rosemarie E. Labanowski
P. O. Box 330621
Kahului, Hawaii 96732

Dear Ms. Labanowski:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letters of May 19, 1996 and May 20, 1996, on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT REL-1 - No-Action Alternative

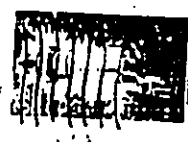
Various alternatives to the Proposed Project, including alternative airport sites, are discussed in Section 4 of the Draft EIS. As indicated in the Draft EIS, the present airport site has been in use as an airport for several decades. The development of another airport at another site would be prohibitive and relocate potential noise, traffic and other effects to another area of the island.

As indicated in Section 2.3, the purposes of the Proposed Project are to (1) create an airport infrastructure that will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of and visitors to the State and Maui through the Year 2010 in a manner that accommodates existing and forecast aviation demands. That is, the Proposed Project is in response to an existing need for improved airport facilities. Further, the Proposed Project is in keeping with the tourism and transportation goals and objectives of the County and State.

RECEIVED
MAY 21 1996

Dear Brian Ishii
May 20, 1996
Regarding Kahului Airport - DEIS proposal
I support the "No Action" Alternative regarding
runway lengthening & a parallel runway.

RECEIVED
MAY 21 1996
Thank You,
Rosemarie E. Labanowski
Maui County Resident



P.O. Box 330621
Kahului HI 96732

Brian Ishii
Edward K Noda + Assoc.
615 Pookoi St #300
Honolulu, HI 96814

STATE OF HAWAII

Ms. Rosemarie E. Labanowski
Page 2
August 20, 1997

AIR-EN
97.822

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

RECEIVED AIRPORTS DIVISION AUG 22 1997



Maui Tomorrow
P.O. Box 1497, Walluku, Maui, Hawaii 96793
phone & fax: (808) 877-2462
e-mail: maui.tomorrow@tdp.org
URL: http://ddi.digital.net/~planet/maui_tomorrow.html

RECEIVED
MAY 24 1996

FRANK E. ROMA & ASSOCIATES

Owen Miyamoto
DOT Aupuni Division
Honolulu Int'l Airport
400 Rodgers Blvd., Ste. 700
Honolulu, HI 96819-1880

Governor Ben Cayetano
GO-DEQC
220 S. King St., 4th Fl.
Honolulu, HI 96813

Assistant Administrator
FAA
800 Independence Ave., SW
Washington, D.C. 20591

Brian Iki
Edward K. Niles & Assoc.
615 Pali St., Ste. 300
Honolulu, HI 96816

Board of Directors
Aupuni Council
Lani Hoanani
Cynthia Lee
Lawrence B. Long
Anthony Suriani
Lorraine S. Tuck
Lorraine S. Tuck
Director Emerita
Lol Gooch
Lana Lukanu
Francis Soria, MD
President/Director
Richard Joseph Larson, Jr.

May 23, 1996

RE: Draft Environmental Impact Statement, Kahului Airport, State Project No. AM1011-07

An Important Note:

On the first page of the DEIS, it is printed: *Comments on the DEIS must be received no later than May 23, 1996.* This statement is not in compliance with State law and rules governing the EIS process. Hawaii's Environmental Review Process provides for public participation through consultation, review, and comment and questions on Environmental Assessments and Environmental Impact Statements.

As regards the review and comment period, the standard is set in the EIS Guidebook in regard to submitting written comments on Draft Environmental Assessments: "The agency or applicant [in this case the State DOT] must respond in writing to comments postmarked within the 30 day comment period."

Regarding the 45-Day Draft EIS Review Period, the Guidebook is not quite so specific, but the intent is clear: "...you must write to the proposing agency... within 45 days of publication of the Notice of Availability."

Furthermore, HRS §11-200-22 Public Review repeatedly states that "...written comments... shall be received or postmarked... within said... period." (emphasis added) Based upon these statements and the guidelines, it is obvious that the rule is that comments shall be addressed by the

...written comments shall be received or postmarked within the 45-day period...

proposing agency or applicant if the comments are postmarked within the comment period, whether 30 or 45 days.

The reason I commence with this note is because I have deliberately chosen to use every possible moment to analyze this 9-inch, 22 pound, five volume document. I consider the 45 day comment period to be inadequate in this situation, especially for the lay person who may not have the skills, prior experience, or intellectual capacity to comprehend this document, nor have those capacities or the time to prepare substantive comments within 45 days.

I trust that you will accept these comments as they are postmarked May 23, 1996.

Now, to the heart of the matter.

To All Whom It May Concern:

Maui Tomorrow is a non-profit public interest group advocating ecologically and economically sustainable development for Maui County. Since 1989, we have been addressing community planning issues relevant to land use, land conservation, open space preservation, and sustainable development. Our programs are supported by more than 1,200 residents, visitors, and community organizations. Additionally, our opposition to the Kahului Airport Master Plan received the signed support of more than 3,700 people, in petitions which were delivered to the Maui County Council in 1991.

Maui Tomorrow is teaching citizens and government decision makers about the value of growth management strategies and sustainable development policies. We have conducted community forums and workshops on planning practices, we have testified at dozens of public hearings, and our Peicha Scholarship program has provided college students with scholarships to assist in their continuing study of environmental topics.

In the interest of demonstrating our authority to address the DEIS and the issues involved, on the following pages is an outline of our programs, accomplishments, and issues areas. The list does not encompass the totality of the work we have been doing on behalf of the community, but merely features the highlights. Included is a page of biographies about our Board of Directors.

I. HISTORY OF MAUI TOMORROW'S EFFORTS & PRODUCTIONS
Conferences and Forums

- The Built-Out Scenario
 - Workshop on Demystifying the Planning Process
 - South Maui Planning and Development Conference
 - Council of All Beings - John Seed Deep Ecology weekend
 - Educational Forum on the Proposed "Development Agreement Bill"
 - "Designing Our Communities" on-going public education project
- Membership recruitment
- 1,200+ members, 14% part-time residents or visitors; as-of May 1996
- Lobbying and Legislation
- County General Plan — inclusion of growth management and open space preservation, and language restricting airport internationalization and expansion, 1990-1991
 - Defeat of unfairly constructed proposed Development Agreement Bill, 1993 - 1995
- Litigation
- Hawea Point, Lahaina District — petition to intervene in Special Management Area
 - Kamaole Park Connection, Kihui District — petition to intervene in Special Management Area permit request
 - Hana Golf Course Re-zoning Approvals — Ka'uiki Council, Maui Tomorrow Inc., et. al. vs. Maui County Council, Council Chairman Goro Hokama, Mayor Linda Lingle, and Keola Hana Maui Inc., to void re-zoning approvals for proposed golf course in Hana
 - Sunshine law infringements — Maui Tomorrow, Inc. vs. the Maui County Council, to seek judicial interpretation & enforcement of Hawai'i Sunshine Law in council meetings
- Efforts translated to value-identified results
- Hawea Point Open Space and Shoreline Conservation Area — 2.3 acre conservation easement in perpetuity, value determination pending
 - Creation of Maui Open Space Trust with \$40,000 seed grant negotiated in Hawea Point agreement by Maui Tomorrow
 - Preserved 37 acres of 38 acre Onelua (Big) Beach at Makena as State Park; State purchase value of more than \$25.2 million; representing 98% of beach front footage

Publications / reports

- "The Built Out Scenario" — analysis of population potentials within the community plans
 - "Working Papers on Sustainable Development, Growth Management, and Land Conservation for Maui County"
 - Report on the South Maui Planning and Development Conference
- Newsletters / action alerts
- Quarterly newsletter and urgent Action Alerts; periodically mailed and faxed

Pejcha Scholarship and Community Service Awards

- November 1993 — awarded first Pejcha Community Service Award
 - February 1996 — awarded second Pejcha Community Service Award
 - June 1994 — awarded first two \$1000 scholarships to students of environmental sciences
 - May 1996 — awarded two \$750 scholarships to students of environmental sciences
- Fundraising / Grants / Discretionary Donations
- Pikeake Fund of Hawaii Community Foundation — \$10,000 in 1991 for Environmental PSAs and "Ten Simple Ways to Save Maui" poster, in association with Maui Epicenter
 - Environmental Support Center — Macintosh computer equipment and training subsidy valued at \$4500, granted in 1992
 - Pejcha Award discretionary donations — \$6250 gifts and matching grants 1993 - 1995
 - Kamaole Park Connection discretionary donations — approx. \$2500, 1993-5
 - Hewlett Packard — ink jet printer valued at \$700; July 1994
 - American Power Conversion — office equipment valued at \$600; November 1994
 - Starr Foundation — \$5,000 to support Hana conservation efforts; December 1994
 - The Wallace Alexander Gerboode Foundation — \$20,000 for "Designing Our Communities" project for 1995 - 1996
 - Atherton Family Foundation — \$2,000 for "Designing Our Communities;" 1995
 - Angelica Foundation — \$6,000 for Hana efforts, and for operations; 1995

II. CURRENT ACTIONS

- "Designing Our Communities" — public education program that brings the principles of growth management and strategies for land conservation, as well as all of the following issue areas, to dozens of community groups.
- Community Lands Acquisition Program — advocating formation of a county "Land Bank" to insure that citizens will have access to shoreline areas & sufficient open space & park lands for current & future needs.
- Long-range planning — urging the Mayor to allocate more funding to the Maui Planning Department for development of state of the art planning techniques and programs, including a Geographic Information System, ordinances for concurrency of development & infrastructure, and comprehensive zoning.
- Hana Golf Course — conducting litigation to void re-zoning approvals and mandate supplemental environmental impact statement; also working to promote ecologically sound resource stewardship in Hana.
- Kamaole Park Connection — intervening to prevent congestive development and join two
- beach parks by open space preservation; working to facilitate a land exchange for a win-win.
- Community Plan Review Process — monitoring recommendations and reviews, encouraging public testimony, commenting on land use choices in various community plan updates.
- Makawan development and community use of town center — monitoring tentative agreement for appropriate community planning choices.
- Agricultural zoning law reform to prevent large-scale subdivisions outside the planning process — supporting legislation presented by the Planning Department, as initiated with Maui Tomorrow, to create effective guidelines for minimum lot size & usage requirements.
- Big Beach — working with State government leaders to preserve the final 1 acre currently held by a Japanese development partnership.
- Kahului Airport — challenging state expansion plans, the ramifications of which Maui County is unprepared to accommodate and which neglect to address serious ecological concerns.

WHAT PEOPLE ARE SAYING ABOUT MAUI TOMORROW...

"Maui Tomorrow's programs to educate the public about their place and choices in the land use decision making process have resulted in greater community involvement and vision. Increased funding and support of Maui Tomorrow's projects will help to improve the responsiveness of government to the wishes of their community at large, and will broadly empower citizens with a responsibility for their own future."

— Patsy Mich, U.S. House of Representatives, Second District, Hawaii, 6/20/93

"Thank you very much for your continued efforts to maintain the true beauty that is Maui... please accept my small donation with a very large measure of appreciation and gratitude."

— Suji Richardson, Hana

"I am pleased to advise you that the Foundation's board of trustees has approved a grant of \$20,000 to Maui Tomorrow in support of its "Designing Our Communities" project. We are delighted that we are able to be of help with such promising and important work."

— Thomas C. Layton, The Wallace Alexander Gerhardt Foundation, 4/4/93

MAUI TOMORROW BOARD OF DIRECTORS

Vice-President, Anthony Raabers, J.D., Attorney-at-Law, formerly Editor-in-Chief, UC Berkeley, Ecology Law Quarterly, provides pro bono services for Maui Tomorrow and is co-chairman of State Park at Makana

Secretary, Celeste King, is also on the boards of the Hahaione and Pua Youth Councils, Ne Po'e Kōhala (Native Hawaiian housing assistance) and the Steering Committee of V.I.V.A.; she is also past President of Mediation Services of Maui, and was one of the original founders of Life of the Land, Oahu.

Treasurer and Director of Organizational Development, Lawrence R. Lasek, is an expert in strategic planning, executive management and management consultation, and entrepreneurial business. He is the President of Maui Juice Company, and has provided strategic planning and implementation services for Apple Computer, and Bank of America, among others. He is also the former Executive Director of the Sequoia Alliance, and worked with the Sierra Club on land use planning issues in Washington, D.C.

Director, Multicultural Programs and Education, Audrey Garcia, B.S., elementary education, owner, Morning Glory Maui, as a third-generation Mauiian provides critical work and testimony in hearings on important local growth management and education issues.

Director, Rural Maui County Outreach, Lita Hamilton, B.A., Science, combines insight and experience as a former board member of Blue Ocean Preservation Society; former Conservation Chair, Hawaii Chapter, Sierra Club; member, Citizens Advisory Committee, Hana Community Plan review; and a Citizen With Standing in the lawsuit which compelled the federal government to submit an Environmental Impact Statement on the Puna Geothermal project.

Director, Operational Development, Arnie Koss, M.B.A., Business Education, has shared his business skills with many public interest non-profits and for-profits including: The Forest Partnership, founder and president, Earth's Best Baby Foods, executive VP, and Earth Guardians, advisory board. He has been featured in Esquire, Forbes, Newsweek, Family Business, and the Wall Street Journal. He shares his comprehensive expertise in environmental business leadership and organizational development to foster Maui Tomorrow's 1% for Maui Tomorrow program.

Louise Rockett has been a West Maui resident since 1973. She is the Art Gallery Director of the Lahaina Arts Society, and has served on the Lahaina Citizens' Advisory Committee to revise the West Maui Community Plan. She is currently on the Board of the West Maui Teachers Association, the Lahainaluna High School PTSA, and is also a member of the Honoluhau Valley Association.

Mark Sheehan, Ph.D., Education, owner, Landmark Maui Properties, Inc., is a dynamic presence in Maui's environmental community: past president of Makawao Community Association; board member of Maui Open Space Trust and State Park at Makana; board member of the Montezuma School, Maui and of Haleakala Waldorf School.

In the context of the preceding history, objectives, and support from both inside and outside the community, we present the following comments on your document. Our comments are identified by the sections (bolded) and page numbers (italicized) presented in the DEIS.

2.3.1.3, 2-20

The DEIS fails to state the various objectives of the Maui County General Plan which would challenge the wisdom of proceeding with the project as detailed. Relevant General Plan objectives and policies that should have been included are:

Of initial importance is Theme No. 3 of Maui County's General Plan which states "Protect Maui County's shoreline and limit visitor industry growth." (emphasis added) The unconstrained forecast upon which the expansion plans are predicated runs completely contrary to this General Plan directive. In fact, to be in compliance with the Maui County General Plan, the Airports Division ought to develop a plan which mitigates and constrains the expected and predicted arrivals. The alternative listed in the DEIS which most closely meets this objective is the "No Action" alternative.

Theme No. 4 of the Maui County General Plan offers a supporting directive in detail: "Maintain a viable economy that offers diverse employment opportunities for residents... to maintain a healthy economy and broaden our economic base so that we are not so dependent on tourism." (emphasis added)

Further support is provided by Theme No. 2 of the Maui County General Plan: "Prepare a directed and managed growth plan... within a framework that consistently and concurrently balances growth demands against human service needs and physical infrastructure supply." The extreme expansion scenario proposed by the State for Kahului Airport would generate a physical infrastructure supply that would far outstrip human service needs and growth demands -- growth demands which must be constrained as directed by Theme No. 3 and visitor industry growth, the upon which economic dependency must be diminished as directed by Theme No. 4.

And as an underscore to all these Maui County General Plan themes, is Theme No. 1 which states: "Protect Maui County's agricultural land and rural identity... [to] preserve agricultural lands for the continuing pursuit of both land intensive and labor intensive agricultural pursuits. This action will also achieve preservation of an open space resource." Expansion plans presented in the

DEIS are irreversibly contrary to this directive. As stated in the DEIS (4.2.3, 4-5), "...the Proposed Project... would change the land use of approximately 139 acres of Agricultural land to Urban for the access roadway, Hansen Road and navigational and lighting aids. Within Phase 2 of the Master Plan, 490 acres will be acquired for airport use. The proposed parallel runway would convert 550 acres from agricultural ... to Urban land use." Thus, an approximate total of 1,179 acres of agricultural land would not be preserved but would be converted to the most extremely opposite land use designation, Urban.

2.3.1, 2-18

The DEIS, in discussion of the relationship of the proposed project to the goals and objectives of the State and County, completely fails to mention State mandates regarding agricultural land and its preservation as an economic resource.

The essence of Chapter 205 in the Hawai'i State Rules, is the admonition that non-agricultural use of agricultural lands is detrimental to the long term health of the State's economy. Though a land use designation may be changed as a code on a map, it is only that --- a code on a map. The actual land --- the aina itself --- retains its qualities regardless of the designation.

The agricultural land targeted in the airport expansion plans is productive agricultural land.

Volume I of the DEIS neglects to mention that this agricultural land is rated "Prime" in the State classification system (ALISH) which rates the relative quality of the State's agricultural land resources. Instead, this important fact is relegated to Appendix D in Volume II. This omission in the Volume I DEIS overview is significant because in review of the project impacts, the loss of hundreds of acres of prime agricultural land is not obviated to the general public and others who have interests in maintaining the integrity and inventory of Hawai'i's agricultural lands.

The DEIS alludes to the value of maintaining these resources by stating, in reference to 85 acres which would be dedicated to navigation easements (3.3.2, 3-2D), "The height restrictions or aircraft overflights will not affect present agricultural activities and could benefit agricultural uses by discouraging non-agricultural uses. Continued use of these agricultural lands for agricultural purposes is expected to act as a benefit due to a buffering effect and maintenance of existing vistas toward the West Maui Mountains."

In this admission, which is supported by State Law and County directives, the DEIS renders the rest of its land use plans and policies contradictory and misleading. Again, "Continued use of these agricultural lands for agricultural purposes is expected to act as a benefit due to a buffering effect and maintenance of existing vistas toward the West Maui Mountains." This is a statement which can be applied to the entire agricultural land area surrounding the existing airport facilities.

Our agricultural land resources are in their highest and best use when devoted to agricultural uses. This value is not conditional upon what the owner plans for the site. It is a stand-alone value.

Though the DEIS states (3.3.2, 3-2D) that, "The primary landowner of the agricultural lands, A&B Hawai'i, Inc., does not oppose the acquisition of land for airport expansion," the inherent agricultural land value does not rest with A&B, it rests in the land.

"Human vanity can best be served by the reminder that:

Whatever his accomplishments

His sophistication

His artistic pretension

Man owes his very existence to a six inch layer of topsoil and the fact that it rains."

--- anonymous

We in the tri-state region reside on about 721,000 acres of land. Not a continent. We are 2,500 miles away from the nearest major food producing region. Protection of agricultural land is not only a land conservation issue, it is a self-preservation issue. We believe that it is in a community's best interest, in terms of its quality of life, its sustainability, and its self-perpetuation, to maintain the ecological balance and integrity of its resources. One of our primary functions as organisms is to eat. We cannot eat your runway.

"When the last tree is cut,

The last river poisoned,

The last fish caught...

You will discover that you cannot eat your money."

--- anonymous

The DEIS gives scant attention to the Farmland Conversion Impact Rating and assessment from the U.S. Soil Conservation Service (Volume II, Section D, Exhibit 22). The DEIS does state: "The agency rated the farmland proposed to be converted at 94 out of a possible 100 points." Despite this obviously high score, the DEIS neglects to fully analyze the impacts of this agricultural lands conversion and loss, and the profound relevance of the rating. Instead of an appropriate interpretation of the rating, followed with appropriate analysis, the DEIS merely states, "This confirms the subject lands are prime agriculture land." (Appendix D, page 19) It should also be noted that this Farmland Conversion Impact Rating Form and the subsequent assessment by the U.S. Soil Conservation Service was only performed for one portion of the affected area.

The DEIS is scandalous in its neglect to analyze the real impact of the irretrievable conversion of agricultural land to urban uses. Anticipated analysis in a serious and adequate Environmental Impact Statement would include studies of the potential for other agricultural uses that will be lost subsequent to conversion. Such potential uses include every food item that can be produced in the subject area, regardless of the landowner's plans.

For example, Maui Land & Pineapple Company (ML&P) formerly owned agricultural land in the area now known as Kula 200. When in agricultural use, the land was cultivated in pineapple. At some point, it was converted to 2 acre residential "ag" lots, which in most cases are not now exhibiting any agricultural uses. However, that disuse does not diminish the agricultural potential. In fact, I am well acquainted with a family that is growing more than a dozen varieties of vegetables on their 2 acre ag lot in Kula 200. They are growing enough to feed themselves and their friends, and though they have not yet taken their produce to market, they can harvest enough to do so.

This demonstrates that the agricultural value of the land rests not with the land use designation or the landowner's plans, it rests with the land. Furthermore, it represents a vital economy that is ignored. Thus, any proposals for non-agricultural uses for the land must assess the impacts which include the loss of agricultural production potential, both from ecological and economic perspectives.

In the so-called Land Use Assessment (Volume II, Appendix D, page 8), the DEIS refers to the State Department of Agriculture coding of this land as Prime on the ALISH maps, and the definition

of Prime agricultural land. That done, the DEIS then works at dismantling the authority and relevance of the coding and the definition, stating, "It is important to note that the Prime classification is dependent on moisture supply," then giving reference (page 10) to writings by Arthur Baldwin who commented in the year 1915 that the irrigation of Central Maui is "...supporting a prosperous population where formerly little existed besides the razorback hog, prickly pear and wild indigo." Furthermore, the DEIS quotes the OSP State Land Use District Boundary Review (page 10) in reference to water supply: "Access to water from the East Maui Irrigation system is a major issue for the plantation (the plantation is... HC&S, a subsidiary of... A&B)." The footnote neglects to mention that the East Maui Irrigation system is a venture of EMI, also a subsidiary of A&B. They (A&B) have the water supply wrapped up and then would hold a gun to their own head, blackmailing us into doing what they want lest they should blow their brains out?

As a set, these three statements demonstrate a rather sarcastic attempt to discredit the value of Prime agricultural land, in agricultural use, to our State's and County's economies.

The first statement, "It is important to note that the Prime classification is dependent on moisture supply," has the appearance of being delimiting when taken out of context from the full definition of Prime agricultural land which states, "Land which has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops economically when treated and managed according to modern farming methods." Referring back to the family in Pukalani/Kula, despite low annual rainfall levels, they are treating and managing the land according to modern farming methods and producing abundant agricultural and economic benefits.

The second statement, a 1915 quote from Arthur Baldwin, is applied in the DEIS as an attempt to build a case for the chance that irrigation will stop flowing in Central Maui and to imply that the result will be a barren wasteland (Arthur Baldwin called it "a bare waste"). What Baldwin in 1915 and the DEIS in 1996 fail to mention is that there was a condition pre-existing on these lands, prior to the impact of Western man, who brought the prickly pear and such non-native species. The reader is left to infer that there was nothing useful. One merely needs to view the area and notice that native species such as coconut palm can exist very well in these conditions, and can supply both food and other products.

or compartmentalize the views, implying that the agricultural land vistas are of little value, though the mountain vistas are of great value. In fact, the project would compromise the agricultural land vistas, and as a result would also compromise, impede, or destroy the mountain vistas.

Furthermore, in Appendix D (page 18), the DEIS says of the MCSRS report: "The study is critical of a new structure along the Hana Highway north of the airport and recommends the following: 'More appropriately landscape the Spreckelsville Wall to lessen its harsh impacts on the scenic environment.'" As if to deflect the attention from the severe aesthetic impacts that would inevitably result from the proposed project, the DEIS says, in effect, "Look over there! Someone else did something that doesn't look good." At best this is irrelevant, and at worst, it is a cynical attempt to blur the extremely vital issue of visual and open space impacts.

At the time that the DEIS was written, the "Wall" had long been very appropriately landscaped with climbing vines to cover the surface and trees on both sides to mitigate the aesthetic impact. It seems that the DEIS is attempting to justify its massive impact on scenic vistas by assuming that precedent is relevant — the attitude that if someone else can create something unsightly and vista-impeding or -destroying, then they are justified in doing so also. An analogy would be subway car graffiti. It may start with a couple of gangs leaving their mark, then it escalates from additional gangs having the sense or attitude that it is okay for them to do it because someone did it before them; soon the entire train is covered in a vomit of symbols, colors, and slogans.

In its Impact Analysis, the DEIS further attempts to dismiss the importance of visual impacts by stating (3.21.2, 3-126,127), "The probable visual effects of the project have been assessed based on the degree to which the proposed airport improvements will change existing visual characteristics of identified visual resources. The proposed facilities will result in few changes to the existing visual character or visual resources of the area. The most important visual resources will retain their existing high visual qualities."

First, "few changes" does not necessarily mean changes of insignificance. One can have a few malignant cancer cells, which would be very significant indeed. Second, judging by the oblique reasoning the document exhibits, one can reasonably assume that the "most important visual resources" that the DEIS is referring to are the mountains. Well, of course the proposed project

The third statement barely deserves acknowledgment, and would not receive it were it not a significant supposition in the DEIS; for it presents a simplistic interpretation of land and water resource management.

I have a Bachelor of Science degree in Resource Development from the University of Rhode Island (1981). An important course of study for me was Economic Geography — the study of the cycle of natural resources' impacts on economies and the economies' impacts on natural resources. In an assessment of land use impacts, we would have been expected to provide far more substantial analyses, supported by facts and figures. In this light, the DEIS is inadequate.

Appendix D, Land Use Assessment, continues with text that is often wholly irrelevant or which twists the facts presented in the studies which it footnotes. These seem to be attempts to obfuscate the issues relative to the real impacts of the proposed project.

For example, under the heading Coastal Scenic Resources (page 13), within the Environmental and Planning Factors Study Area section of Appendix D, in reference to the Maui Coastal Scenic Resources Study (MCSRS) (DEIS footnote 18), is the text, "The study lists the airport area as a noteworthy view of an important open space and includes Kanaha Pond as a distinctive view of a site of natural beauty." In this statement, the DEIS suggests that the airport is a noteworthy view, is an important open space. Contrarily, in the DEIS Volume I, Visual Effects, Existing Conditions (3.21.1, 3-126), there is the statement, "The Airport itself was identified as a 'Noteworthy Important Open Space.' The open area surrounding the Airport consists primarily of agricultural lands used for sugar cane. As a result, this manmade open space [the airport? the agricultural lands?] is considered to have only moderate visual qualities."

And yet, the DEIS, in its preceding paragraph (3.21.1, 3-126) stated, again in reference to the MCSRS, "The views of Haleakala and the West Maui mountains from, respectively, Hana Highway are unique due to the size and natural features of the mountains. Both views have been classified as Distinctive Mauka Views, and are considered to have generally high visual qualities."

The report that the DEIS refers to (MCSRS, DEIS footnote 18) was describing the agricultural lands in the vicinity of the airport as the noteworthy view of an important open space, as the vista across the green fields includes the West Maui mountains. The DEIS, in effect, attempts to segment

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doesn't include any changes to the mountains themselves, so certainly they "will retain their existing high visual qualities." But when viewed as a total resource -- the agricultural land vistas laying the foreground foundation for the background mountain vistas -- the impact upon the resource is great and is omitted in the DEIS.

The DEIS even states, "The parallel runway will change the visual character of the area west of Hana Highway from agricultural to airport use. In addition, the trees lining the roadways in that area will be removed." (3.21.2, 3-127)

The DEIS is referring to "the line of trees seen from Hana Highway at its intersection with Kala Road," which "is classified as a 'Noteworthy' site," that has "moderate... visual qualities." (3.21.1, 3-126) Again, this is a very significant change, not only for the visual value of the trees themselves as a foreground visual resource, but also for their part in the total scenic vista resource which includes the mountains.

3.21.3, 3-127

Now to the justification the DEIS attempts. It makes various unreasonable assumptions and unsupported conclusions, including:

"Visual effects tend to be subjective, as it is difficult to evaluate and quantify the significance of the view obstructions and/or changes."

This is the first time the DEIS refers to obstructions, and it is deliberately non-specific about what will be obstructed and/or changed. Furthermore, owing to the vitality of our tourism economy and our artistic community, it is no longer difficult to quantify or evaluate the significance of these impacts. While it may seem natural to dismiss a grain silo in the midwest United States as insignificant due to its subjective value, an entire economy still thrives on the image of a just such a grain silo painted by the artist Andrew Hopper in the early part of this century.

Similarly, artists and photographers, both professional and amateur, residing on Maui and visiting from elsewhere have recreated numerous perspectives of such vistas as the line of trees at Kala Road, the cane fields around the airport, Haleakala and the West Maui mountains, and combinations of them all. The long-term economic benefits of the economy that thrives based not just on the activities themselves, but more so on the resources, is stunning; for not only are the

images purchased for their own merit, but also because people who tour Maui and enjoy the vistas, often want to take an image home to remind them of what they saw and where they were. An adequate DEIS would work very hard to quantify and evaluate this economy and the impacts that the proposed action would have on the economy.

There is precedent for such study. Among a group of citizens in West Maui, which comprised the Citizens Advisory Committee to the West Maui Community Plan, a study was conducted of the approximate value to the local economy of the Open Space and Agricultural land uses which result in open space resources and scenic vistas (the production of images of which constitutes a thriving economy of its very own!).

West Maui resident Dave Chenoweth, in testimony (1/4/94) to the Maui County Council regarding the West Maui Community Plan Update, presented an overview of the study:

"Our visitors want what we want, a beautiful and peaceful island. West Maui contributes almost \$1.4 billion per year to our County and State economy. This represents almost all of our West Maui gross economic product. If one-third of our West Maui visitor attraction were marine, one-third were visitor plant amenities, and one-third our extraordinary beautiful mauka open spaces, and if just one-half of the mauka one-third were attributable to our nearby agricultural open spaces (fallow or not), then each acre of our remaining West Maui ag lands contribute about \$9,000 to our \$1.4 billion West Maui visitor economy each year." (emphasis added)

Certainly if a private citizen, volunteering to assist his community in understanding and preparing for its growth and development challenges, can prepare such an analysis (of which this testimony was only an overview), then surely the analysts under contract to develop an adequate DEIS on the Kahului Airport Master Plan can be more forthright and less simplistic. As published, the DEIS does not adequately describe all the possible impacts, it superficially discusses the impacts it does choose to address, it present assumptions which are unreasonable, and it does not provide adequate information to support its conclusions.

Returning to the various unreasonable assumptions and unsupported conclusions made in 3.21.3, 3-127, the DEIS continues, stating:

"Issues of scale, massing, and architectural compatibility with surrounding structures are often used to gauge the visual compatibility of a project. However, in this case, these design details are not available. The proposed improvements are conceptual at this time."

How is it possible that the DEIS projects costs of about \$100 million for the airport master plan build out, but cannot provide information on architectural design, including scale and massing?

"For purposes of this EIS, a significant adverse effect would occur where the proposal would substantially obstruct long-range views, unique environmental or manmade visual features, or views from important public gathering places."

This statement admits to the significant adverse effects, but of course, not from their point of view, since they only see what is missing to them — more airport facilities, runways, and construction on agricultural land. However, as previously stated in these comments, the obstruction would be very significant. But the DEIS attempts to skirt discussion of this impact by its aforementioned disclaimer on the availability of design details.

"If the proposal is of a substantially different mass or height from surrounding development, the disparity would be considered an adverse, but not significant, effect."

What the DEIS suggests is that in the context of existing airport facilities, more airport facilities are insignificant; and in the context of existing agricultural uses and scenic vistas, more airport facilities are insignificant. This is an extremely unreasonable assumption.

"Based on the evaluation criteria listed above, there will be no significant impacts due to the Proposed Project, except for the parallel runway."

The paragraph of text which is referred to as "the evaluation criteria listed above" does not constitute evaluation criteria; it constitutes inadequate analysis, unreasonable assumptions, and project-driven opinion. Then, the DEIS sets us up to receive information about the special impact situations presented by the proposed parallel runway, but lets itself off the hook from going into them by claiming, "...construction of the parallel runway has potential visual impacts and will be addressed in a future environmental document at the appropriate time." And in 3.21.4, 3-129, it doubles up its illegal hazard by stating, "Because of the speculative and long-range nature of the parallel runway, it is difficult at this time to evaluate its impact on the visual characteristics of the

project area. Therefore, prior to construction of the parallel runway, an environmental document will be prepared to assess its impacts and provide mitigation measures, if applicable."

In 2.5, 2-43 Project Phasing, the DEIS previously admitted that construction of a parallel runway is another phase of the airport master plan (through lack of such admission would not warrant waiver of the legal requirements). For more evidence that the parallel runway is an admitted phase of the project, refer to DEIS Volume II, Appendix D, page 24, which states:

"In sum, the adverse impacts on land uses of the KAMP alternatives are:

- the expansion of the Ldn 60 noise area caused primarily by the parallel runway...
- the acquisition of sugar cane land for airport uses including the parallel runway..."

HRS §11-200-12(b) states: "In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short and long-term effects of the action." (emphasis added) This DEIS fails to do all of that."

In fact, the DEIS fails the requirements set forth in HRS §11-200-17, including (j): "The draft EIS shall address the relationship between local short term uses of humanity's environment and the maintenance and enhancement of long-term productivity... and a discussion of the extent to which the proposed action forecloses future options, narrows the range of beneficial uses of the environment... shall be included." In light of concerns raised in these comments, regarding agricultural land values in an ecological sense, the DEIS again fails the task.

In Table 3-51 of 3.21.3, 3-128, the DEIS, contrary to logic and reason, unsupported by facts, concludes there will be no significant effects on visual characteristics, whether land forms, coastal views, maui views, open space, or sites of natural beauty. And in 3.21.4, it states that since "there are no significant impacts... no mitigation measures are required." Lacking confidence in the credence of that statement, it twists again to cover itself by stating, "However, to minimize environmental harm, the proposed airport improvements will be designed to blend with the existing environment and views to the greatest extent possible." Please note that it does not say that "though there will be no impact we will do this and that," what it says is, "...to minimize environmental harm..." Therefore, it must be assuming some environmental harm.

In fact, just one paragraph later, the DEIS states, "The removal of agricultural lands will be mitigated by the land serving as an open space resource and appropriate landscaping will provide an open space buffer between Hana Highway and the runway." This is a mockery of State land use laws and public land use values. Open Space and Airport are in as extreme opposition as Park and Urban, and while cultivated Agricultural land has open space characteristics, the same cannot be said about airport facilities and activities. Up, down, across, or around -- no matter how you look at it, it's urban.

At an earlier point in Appendix D, there is discussion of Tsunami and Flooding hazards relevant to the proposed project. The DEIS admits that there is "...the chance of flooding caused by intense rainfall," and Exhibit 9 shows that major portions of the proposed project area, including Kaliainui Gulch, are in the 100 year flood hazard zone.

It continues to say that "The tsunami inundation zone extends up to 2,000 feet inland in some locations. Wave heights of 28 feet... were recorded during the 1946 tsunami. Most existing and proposed airport facilities are or will be constructed above the historic tsunami flood elevations." But the DEIS fails to mention in its evaluation of impacts is that the jet fuel pipeline is proposed to be constructed in Kaliainui Gulch, which would be subject to both 100 year storms and tsunami inundation.

The DEIS misleadingly attempts to ride both sides of the fence on potential impacts. On one hand, it says elsewhere in the document that existing conditions pose a threat to native flora and fauna, so there is no anticipated additional impact from the proposed project; which in itself is an unreasonable assumption and a conclusion not supported by facts. Then, in Appendix D, page 24, it attempts to be a prophet of doom by speculating that the Prime agricultural lands in the proposed project area would not be Prime agricultural land anymore "...should there be decreases in the availability of water via the East Maui Irrigation system." Thus, the DEIS is frivolous in its dismissal of responsibility within the scope of the project and by its discussion of speculations and assumptions outside its purview.

And finally, in Exhibit 19, the DEIS is faulty and inadequate in its discussion of the impacts on land uses. Comments on these problems will be arranged numerically according to their presentation in Exhibit 19.

1. Kanaha Pond: The DEIS admits that "excessive noise or night lighting may cause significant impacts depending upon tenant activity," but it fails to present a mitigation measure.

2. Kanaha Beach Park: Referring to noise from aircraft operations, the DEIS admits that "Part of the Park is significantly impacted by aircraft noise" impacts resulting from the proposed project, yet it claims that future compatibility will remain the same as existing compatibility. If a factor in the equation changes, then the result must change.

3. Spreckelsville Beach and Offshore Area: Similarly, the DEIS admits that "The beach and offshore areas are significantly affected because they are almost entirely within the Ldn 60 area," but again claims that future compatibility will remain the same as existing compatibility. This is absurd when one studies the demographics of the beach park users. They are mostly mothers and very young children. In existing conditions, there are times when voices must be raised to be heard over the noise of aircraft operations. With the proposed increase in aircraft operations, and the admitted Ldn 60 impact, it becomes a situation that is a greater risk to the welfare and safety of the families. A child wailing in the lagoon may get into trouble and its cries for help would be drowned by the aircraft noise. It is recommended that a more respectful, less superficial analysis of the impact and mitigation measures (none of which are offered) be presented.

3.5.1.7, 3-40

As a teaser for the \$300 million (in contracts that would come from the build out of the KAMP, the DEIS contains a superficial discussion of the state of construction employment on Maui. But there is no bibliographical source or other reference. The allusion to "almost one-third of Maui's 1,200 construction-related union members being out of work" is purely anecdotal. If this is sufficient justification for the proposed project, then anecdotal evidence should suffice for justification to abandon the project. The evidence I present is this, my landlords and other people I know have long been having difficulties engaging the services of construction-related workers.

18 PAGES (2 PAGES)
12/11/96

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August 20, 1997



REPLY TO
AIR-EN
97-906

Very few are available, and those that are very busy and usually are engaged at multiple construction sites simultaneously. In fact, it is difficult to get them to finish their projects because they are so busy. And a look around just about anywhere on Maui will provide outstanding examples of both large and small-scale construction in earnest. This is another case of the DEIS making unreasonable assumptions and failing to support its conclusions.

4.2.11 Biotic Communities

The first sentence is a stunningly absurd assumption and conclusion.

At this time, we will conclude with the summary statement that the subject DEIS is inadequate to the extreme, for not only the aforementioned reasons, but also because the National Park Service was inappropriately denied cooperating agency status, and also because the general public has overwhelmingly expressed their disapproval of this plan, as evidenced repeatedly during the years 1990-1992, and at the public hearing held by the DOT/FAA at Kahului Airport on May 8, 1996.

We hope that the applicant agencies will abandon the KAMP and apply their resources to more appropriate, acceptable, and necessary projects.

On behalf of myself, the Board of Directors, and 5,000 supporters...

Sincerely,

Richard Joseph Lafond, Jr.
Richard Joseph Lafond, Jr.
Executive Director

Mr. Richard Joseph Lafond, Jr.
Executive Director
Maui Tomorrow
P. O. Box 1497
Wailuku, Hawaii 96793

Dear Mr. Lafond:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 23, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT RJL-1 - Draft EIS Response Period

In compliance with the State EIS Rules (Chapter 200, Title 11, Hawaii Administrative Rules) in effect at the time of the publication of the Draft EIS, the public review period was not to exceed 30 days from the notice of availability of the Draft EIS as published in the OEGC Bulletin. That rule has subsequently been changed to allow the public 45 days for review.

COMMENT RJL-2 - Relationship of The Proposed Project to the Goals and Objectives of the State and County

The relationship of the Proposed Project to the goals and objectives of the State and County are described in Section 2.3.1 of the Draft EIS. As indicated, the Proposed Project is consistent with appropriate State and County goals and objectives regarding tourism and transportation. The consistency of the Proposed Project to the County General Plan has been confirmed by the administration and several council members.

COMMENT RJL-3 - Use of Agricultural Lands

The agricultural lands to be used for the Proposed Project are discussed in Section 3.17 of the Draft EIS. As indicated, the agricultural lands to be used for the Proposed Project will not adversely affect the land owner's agricultural operations.

COMMENT RJL-4 - Visual Impact of Proposed Project

The potential visual impacts of the Proposed Project are discussed in Section 3.21 of the Draft EIS. As indicated, the probable visual effects of the Proposed Project have been assessed based on the degree to which the Proposed Project will change existing visual characteristics of identified visual resources. In general, the Proposed Project is in keeping with the design principles established in the County's Scenic Resources Study. The proposed facilities will result in few changes to the existing visual character or visual resources of the area. The most important visual resources will retain their existing high visual qualities.

COMMENT RJL-5 - Tsunami and Flooding Hazards

The potential impacts of the proposed alignment of the pipeline from Kahului Harbor to the Airport Bulk Fuel Tanks, as well as mitigation measures to minimize those impacts, are discussed in the following sections of the Draft EIS: Section 3.4 (Geology, Physiography, Soils, Agricultural Potential and Earthquakes); Section 3.8 (Water Quality); Section 3.10 (Historical, Architectural, Archaeological and Cultural Resources); Section 3.13 (Hydrology Floodplain Management and Drainage); and Section 3.20 (Solid Waste, Hazardous/Toxic Waste and Waste Wash Water).

If and when the fuel pipeline is constructed, it will be installed and operated by the Airline's fuel consortium, the Hawaii Fueling Facilities Corporation. As currently proposed, the pipeline would be aligned on the ocean side (north) of Kanaha Pond. Given this location, there is a potential for a significant impact on Kanaha Pond and coastal water quality should a leak or line break occur. However, the pipeline will be designed to include a "quick flush" system, double walled pipes and leak detection sensors to minimize this risk. The primary purpose of the proposed fuel pipeline is to reduce dependence on the fleet of fuel tanker trucks which currently convey fuel to the Airport from storage facilities at Kahului Harbor. These

trucks must travel along Hana Highway, Haleakala Highway, Kala Road and Ena Street to reach the Airport. Once the trucks arrive at the Airport, they must carry fuel cargo across Runway 2-20 to reach the air carrier aircraft parking apron adjacent to the passenger terminal. This requires clearance from the Federal Aviation Administration (FAA) Air Traffic Control Tower. It is generally accepted that fuel pipelines provide safer, more environmentally sound fuel conveyance system than that provided by tanker trucks traveling along public roads and across runways.

Due to the long-term, speculative nature of the fuel pipeline from Kahului Harbor to the Airport Bulk Fuel Tanks, the EIS can only discuss potential impacts of this project in general terms. If and when the pipeline project is considered for construction, additional environmental documentation is required.

COMMENT RJL-6 - Noise and Lighting Effects on Kanaha Pond

The potential effects of increased aircraft noise levels and lighting on the blots of Kanaha Pond are discussed in Sections 3.11.2 and 3.19, respectively. As indicated, a study of increased nighttime flights was conducted to determine any effects on the Hawaiian Stilt and Hawaiian Coot. In summary, this study showed no correlation between the Hawaiian Stilt's responses and aircraft overflights. That is, the birds were not affected by the increased nighttime noise or lights. It is generally recognized by biologists that birds readily become habituated to their surroundings and are not adversely affected by aircraft noise or lights.

COMMENT RJL-7 - Noise Effects on Kanaha Beach Park

The potential effects of aircraft generated noise on the airport environs is discussed in Section 3.2 of the Draft EIS. As indicated, beach parks and other types of outdoor activity are compatible land uses within sensitive aircraft noise zones. As shown in Table 3-3, aircraft generated noise levels in the vicinity of Kanaha Beach Park are expected to decrease with the Proposed Project.

COMMENT RJL-8 - Construction Employment Impacts of Proposed Project

The potential effects of the Proposed Project on the construction employment situation of the island are discussed in Sections 3.5.1.7 and 3.5.2. As indicated in Section 2.3, the purposes of the Proposed Project are to (1) create an airport

Mr. Richard Joseph Lafond, Jr.

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Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared

Mr. Richard Joseph Lafond, Jr.

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infrastructure that will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of and visitors to the State and Maui through the Year 2010 in a manner that accommodates existing and forecast aviation demands. That is, the Proposed Project is in response to an existing need for improved airport facilities, not to create construction or other types of employment. It stands to reason, that if construction activity, as evidenced by construction permits, has dropped significantly over the past few years, there would be unemployment in the construction industry. It is likely that many construction workers have moved off island due to the low construction activity. This probably accounts for the lack of construction workers on the island.

COMMENT RJL-9 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CCAPS), of which the HDOOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the

Mr. Richard Joseph Lafond, Jr.
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by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT RJL-10 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials, as well as, direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1576

May 21, 1996

David J. Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850

Dear Mr. Welhouse,

I am writing to add my voice to those concerned that the permitting process attending the proposed lengthening of the Kahului Airport runways is being circumvented or conducted with insufficient rigot.

Undoubtedly you are familiar with the criticism that the recently completed Environmental Impact Study prepared for this proposed project inadequately addresses the very critical issue of alien species introduction. I assume also that you are aware of the tragic history of Hawaii's native flora, fauna and ecosystems, and the perilous position that those surviving species and habitats occupy.

My purpose here is not to recite facts with which you are already familiar but to emphasize to you that there are a great many people in this country and community who regard the relentless degradation of our natural inheritance as quite a serious matter. It's not clear to me at what point people in positions of power and responsibility are willing to draw the line between the apparently insatiable requirements of economic growth and the preservation of a finite and diminishing natural world, but I for one, as a very ordinary citizen, am becoming angry at the willingness of public officials to compromise what are truly public assets for the economic benefit of select populations.

The proximity of Kahului Airport to Kanaha Pond, a designated wetland sanctuary, and Haleakala National Park, an International Biosphere Reserve which harbors more endangered species than any other site in the National Park System, requires public officials, in my view, to take extraordinary measures to guarantee the biological integrity of these areas. In this case it appears that just the opposite has occurred. In addition to an apparent willingness to accept a flawed EIS, the fact that public officials excluded the National Park Service from discussions relevant to their mandated stewardship of Haleakala is unfathomable and casts additional suspicion upon the entire process and the motives of those involved. This is the sort of perception that contributes to a corrosive and growing cynicism about the efficacy of public service in this country.

I urge you to do all that you can to insure that all provisions of the process are rigorously applied and that the unique requirements of our fragile Hawaiian environment are fully protected.

Sincerely,



Douglas K. Lamerson
1777 East-West Road
Honolulu, Hawaii 96848

.cc: Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd. #700
Honolulu, HI 96819

Michael Wilson
Department of Land and Natural Resources
1151 Punchbowl St.
Honolulu, HI 96813

See Comment DK1-1

See Comment DK1-2



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAHUNA
HAWAII

DEPARTMENT OF TRANSPORTATION

KAHUNA
Brian K. Mirani

DEPARTMENT OF TRANSPORTATION

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97-928

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the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information

Mr. Douglas K. Lamerson
1777 East-West Road
Honolulu, Hawaii 96822

Dear Mr. Lamerson:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 21, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comment, which are attached for reference.

COMMENT DKL-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the coordinating group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding

Mr. Douglas K. Lamerson
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was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DKU-2 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

REKUMAIL EASY FAX
1-800-828-8888



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MAJORITY REPORT
RECOMMENDATIONS
CALVIN LAMMOT
Brian K. Minasi

MINORITY REPORT
AIR-EN
97.815

May 16, 1996

Ralf Lee
1057 Hakawao Avenue, Apt. A208
Hakawao, HI 96768

August 20, 1997

Mr. Owen Miyamoto
400 Rodgers Blvd. # 700
Honolulu, HI 96819

Subject: Testimony on EIS Issue

Dear Mr. Miyamoto:

After all the mistakes people have done about importing alien species to new environments, hasn't anybody learned from history? Turning the Kahului Airport into an international airport is going to effect Maui's life style in the worst way. The least thing the EIS or DEIS plans should include are a strict quarantine plan to protect Maui's natural environment. As is, the plan is totally irresponsible.

Sincerely

Ralf Lee

copy: Don Reeser, Superintendent, Haleakala National Park

Mr. Ralf Lee
1057 Hakawao Avenue, Apt. A208
Hakawao, Hawaii 96768

Dear Mr. Lee:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 16, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This is in response to your comments, which are attached for reference.

COMMENT RL-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of National Park Service (NPS), Department of Interior Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the proposed project on the listed and candidate species and designated and proposed critical habitat.

This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT RL-2 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed

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Mr. Ralf Lee
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Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT RL-3 - Inspection and Quarantine Facilities

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Walhouse)

The following Maui residents wish to express their opposition to the proposed expansion of Kahului Airport:

- Signature:** *Karen (KAREN LAMON)*
Address: 35 Awa P., Pukalani HI 96768
- Signature:** *Mary Matsukawa*
Address: 44 Awa Pl. Pukalani HI 96768
- Signature:** *Donna Russell*
Address: Pukalani HI 96768
- Signature:** *Ernest Matsukawa*
Address: 44 Awa Pl. Pukalani HI 96768
- Signature:** *David Testis*
Address: 59 Joseph Pukalani HI 96768
- Signature:** *Julia Leonard*
Address: 620 Hoene St. Hakaawa HI 96768
- Signature:** *Julia Leonard*
Address: 630 AENE ST. MAKAMAU HI 96768
- Signature:** *Julia Leonard*
Address: P.O. Box 524 Haka HI 96701
- Signature:** *Kathy M. Humbins*
Address: 121-A MIKIOKA ST. MAKAMAU HI 96768
- Signature:** *Debra Choffo*
Address: 291A EHIYEMI ST. PUKALANI HI
- Signature:** *Kathy H. Howell-Jada*
Address: 760 Muluhi Pl. HI 96768
- Signature:** *Jovic Cabajar*
Address: 1106 NIKOJADA DRIVE HI 96768

Owen Miyamoto
Hawaii Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd., #700
Honolulu, HI, 96819
May 22nd, 1996

This letter is intended to express the opinions of the Maui residents whose signatures appear on the attached pages. All of the undersigned Maui residents are opposed to the proposed international expansion of Kahului Airport. We feel that the current Environmental Impact Statement has not given sufficient consideration to the issue of alien species introductions to Maui from foreign lands. By excluding the National Park Service from discussions concerning the threats to Maui's native ecosystems, the Federal Aviation Administration and the Hawaii Department of Transportation have displayed an evasive disregard for the long-term preservation of Maui's numerous and important biological reserves, which include the following:

- Haleakala National Park and International Biosphere Reserve
- Waikamoi Preserve
- Kapunakea Preserve
- Hanawi Natural Area Reserve
- Kuniho Natural Area Reserve

These preserves, as well as many acres of pristine native forest held within the State Forest Reserves of East and West Maui, are among Hawaii's finest remaining examples of native ecosystems, and the issues involved in their preservation should be given full priority in the consideration of this expansion project. The results of this expansion are certain to be widespread and permanent for Maui, including not only the threat to native species, but also the long-term growth of the human population and automobile traffic, and the inevitable urban development which accompanies such growth. Maui's residential areas are already growing rapidly, to the dismay of residents who fear that Maui's unique beauty and charm will be permanently lost as a result of overdevelopment, as has already occurred on O'ahu.

We are hardly convinced that the proposed measures for preventing the importation of alien species will be effective enough to adequately screen the inevitable flood of undesirable insects, animals, plants, and diseases which will accompany international air traffic. The current problems with alien species are nearly beyond control already. We feel that the current EIS is unsatisfactory and that the airport expansion will lead to even greater species problems in the future. In addition, we feel that the expansion will lead to a long-term trend toward excessive urban development on our island. For these reasons, please consider our opposition to the Kahului Airport Expansion Plan.

Maui.

1614

See Comment Page 2

DOCUMENT CAPTURED AS RECEIVED

The following Maui residents wish to express their opposition to the proposed expansion of Kahului Airport:

The following Maui residents wish to express their opposition to the proposed expansion of Kahului Airport:

Signature: Juliana [Signature]
Address: P.O. Box 524, Hiki, HI 96701

Signature: Kristopher Gentry
Address: 326 A. Naha Place, MAHAUUA, HI 96768

Signature: [Signature]
Address: 1210A MIKIOLO ST. MAHAUUA, HI 96769

Signature: [Signature]
Address: 600 D. MOIENU RD. WAIHUKU HI 96793

Signature: Debra Choffo
Address: 391 A EHIKANI ST. KULUELEI HI 96761

Signature: [Signature]
Address: 270 [Address] HIKOI, HI

Signature: [Signature]
Address: 170 [Address] HIKOI, HI

Signature: [Signature]
Address: 337 FRANKIE PL KIHAI MAUI 96753

Signature: [Signature]
Address: 1016 MAHOLELA DRIVE, HIKOI HI 96793

Signature: [Signature]
Address: 390 KAHU PL KAHU HI 96753

Signature: [Signature]
Address: [Address] MAUI MEDICAL GROUP

Signature: [Signature]
Address: 2161-A WINE LANE, WAIHUKU HI 96793

Signature: [Signature]
Address: [Address] SOVIC CABAYAN

Signature: [Signature]
Address: 271 AHOE ST. KIHAI, MAUI 96753

Signature: [Signature]
Address: [Address] KARI ERWIN PO BOX 391 KULA

Signature: [Signature]
Address: 303 KAHU PL KIHAI HI 96753

Signature: [Signature]
Address: [Address] KARI EDIGER PO Box 1671 Kihai 96753

Signature: [Signature]
Address: 373 [Address] KAHUHI, HI 96734

Signature: [Signature]
Address: [Address] BURELL & ANGIE LUKANA HI 96761

Signature: [Signature]
Address: 97 IIE KUPONO ST. WAIHUKU, HI 96793

Signature: [Signature]
Address: [Address] JUDY GALLION 2120 MAIN ST. WAIHUKU HI 96708

Signature: [Signature]
Address: 400 HANICKIE RD. MAHAUUA HI 96768

Signature: [Signature]
Address: [Address] DEBRA CHOFFO 391 A EHIKANI ST. KULUELEI HI 96761

Signature: [Signature]
Address: 267 KROFOKI ATEN KAHU HI 96734



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

RECEIVED
DEPARTMENT OF TRANSPORTATION
AUG 22 1997
Brian K. Minnai

DEPARTMENT OF TRANSPORTATION
AIR-EN
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Ms. Kristen Lennon
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August 20, 1997

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time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

Ms. Kristen Lennon
35 Aewa Place
Pukalani, Hawaii 96768

Dear Ms. Lennon:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 22, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT KL-1 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in

COMMENT KL-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been

discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT KL-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT KL-4 - Effects of Proposed Project on Ecosystems

The potential effects of the Proposed Project on biotic communities is discussed in Section 3.11 of the Draft EIS. In brief, the Proposed Project will result in the loss of Cane Field/Ruderal Border, Koa Haole/Mixed Understory, and some Open Grassland vegetative zones. These vegetative zones are primarily habitat for introduced bird species. Similarly, the Proposed Project will affect feral mammals that inhabit the agricultural areas where the parallel runway will be constructed. The feral mammals are also introduced species.

The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will not directly impact the marine environment and there will be insignificant or no effects on water quality or runoff.

Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

COMMENT KL-5 - Population Growth

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The

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Ms. Kristen Lennon
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August 20, 1997

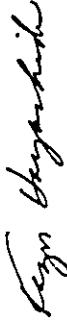
For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT KL-6 - Effects of Proposed Project on Traffic

The potential effects of the Proposed Project on the surface transportation system are discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project in itself, will not have an adverse effect on existing key intersections. In fact, the Proposed Project will have positive impacts on key existing intersections, such as Dairy Road and Hana Highway. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and crossings for the proposed bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

If you have any questions, please contact Mr. Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

FA'ALIGA'ATA
INSTRUMENTAL
GALIPAN LAMATO
Brian K. Mizal

PHILOSOPHER
AIR-EN
97-903



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

REKUNUI LAMATO
19970820

Alex Lessin, Ph.D.
Joan Lessin, Ph.D.
School of Counseling
Rt. 2, Box 166
Wailuku, Hawaii 96793

Dear Drs. Lessin:

Subject: Comments on Draft Environmental
Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 7, 1996, on the
Draft EIS for the proposed Kahului Airport Improvements. This
letter is in response to your comments, which are attached for
reference.

COMMENT AJL-1 - No-Action Alternative

As indicated in Section 2.3.3, the purposes of the Proposed
Project are to (1) create an airport infrastructure that will
support the present and future goals and objectives of the County
and State; and (2) to continue to provide safe, efficient,
economical, and convenient air transportation facilities for
passenger and air cargo service to the residents of and visitors
to the State and Maui through the Year 2010 in a manner that
accommodates existing and forecast aviation demands. That is,
the Proposed Project is in response to an existing need for
improved airport facilities. Further, the Proposed Project is in
keeping with the tourism and transportation goals and objectives
of the County and State.

SCHOOL OF COUNSELING

Holotropic Breathwork™ & Training
Relationship Counseling
Voice Dialogue Facilitation

ALEX LESSIN, Ph.D.
Psychological & Transpersonal Studies
Primal Central Therapy

JOAN LESSIN, Ph.D.
Hypnosis & Counseling
Regression & Reprogramming

MAY 7, 1996

Dear Mr. Ishii,

We support the "no action" alternative
regarding runway lengthening and a
parallel runway.
We don't need another Hanalei and
Maui.

Please keep Maui "no Ka oi."

Sincerely,
Joan Lessin, Ph.D.
[Signature]

RECEIVED

MAY 09 1996

EDWARD K. MOHA & ASSOCIATES

Rt. 2, Box 166
Wailuku, Maui, Hawaii 96793
(808) 244-4103

RECEIVED MAY 10 1996

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Alex Lessin, Ph.D.
Joan Lessin, Ph.D.
Page 2
August 20, 1997

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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FROM FILE 48



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
669 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAUHAHAUA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
BRIAN K. HIRAIWA

#HRYVREF10
AIR-EN
97-122B

August 20, 1997

Ms. Lila
P. O Box 1817
Kihei, Hawaii 96753

Dear Ms. Lila:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 1996 on the Draft EIS
for the proposed Kahului Airport Improvements. This letter is in
response to your comments, which are attached for reference.

COMMENT L-1 - Fuel dumping

Commercial aircraft do not dump fuel except in cases of
emergency, which are very rare. This is because commercial
aircraft are designed to land with a wide range of fuel volume.
The probability of an emergency fuel drop near Kahului Airport is
remote. If an emergency fuel drop did occur near Kahului, the
chances are that the majority of the fuel would vaporize or be
dispersed by the winds, instead of impacting land areas. If a
commercial aircraft did have to dump its fuel and depending on
the aircraft safety, it would be just before or at the very
beginning of their approach, which would place them well out over
the ocean and not during the final approach segment to the
runway.

In addition, fueling of commercial aircraft is done with a
sophisticated vapor recovery system in place, and the fuel tanks
on the aircraft are pressurized shortly after takeoff and
depressurized just before landing, as the landing gear goes down.
The chance that the seals in the pressurization system will leak
is slight, especially since these systems are checked on a
regular basis.

11/20/97/55

*Rayannei Capetian
Governor - State of Hawaii.*

*I support the "in action"
Alternative regarding fueling
the Maui Airport runway and
parallel runway.*

*It's clear that both side
options being argued by both
sides land. How many more
people of Maui do we want
The do is already underway
and when to address the
negative impact on our
airports & ports, the
problems, the inability of
Maui to land and take
lower more over. we need
already underway fuel - water
a single system.*

*We can say "organic" when
they know not what they do."
they do know what they do."
as did the author of the
work probably ignored
of the problem & the
many will be
of Maui - the most
with a special of Maui.
to the 18th
Kihei, HI. 96753*

See Comment L-4
See Comment L-3
See Comment L-2
See Comment L-1

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COMMENT L-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the

Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT L-3 - Growth Impacts

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced)

Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT L-4 -- "Blatantly Ignored"

We strongly disagree with your comment that the impacts of a longer runway were "blatantly ignored". The impacts of the Proposed Project was objectively and analytically studied and

Ms. Lila
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August 20, 1997

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presented in an unbiased manner in the EIS. However, your comments will be made available to the decision makers prior to a final decision on the Proposed Project.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1565

MRS. JAMES C. LINDSAY
Olinda, Maui, Hawaii 96768

May 20, 1996

Owen Miyamoto
Dept. of Transportation, Airport
Honolulu International Airport
400 Rodgers Blvd., #700
Honolulu, HI 96810

Dear Sir:

Re: The Extension of Kahului Airport

Haleakala National Park which is our greatest jewel known all over the world and visited by millions would be devastated. One female brown tree snake can carry inside her the making of hundred more baby snakes without her meeting up with another male. Case in point - GUAM. Several of these snakes have already be found and killed at Honolulu International Airport so why not here. In addition to the snakes are hundreds of other pests, insects, and seedlings carried on shoes of various predator types which can quickly wipe out entire stands of trees and our large farms of vegetable and fruits - to say nothing of our huge flower industry. Your ESI statement did not properly define these hazards all of which have a dangerous impact on our economy and the livelihood of many people. All through the years the National Park employees have worked to keep out anything that would endanger the rare Silversword, the few rare birds that are still left and the sacred place of the Hawaiians - often calling in volunteers to help.

The runway extension would necessitate making many new roads, realigning others and changing our island scenery completely - all at a time when our existing roads are very sadly in disrepair and not in keeping with the growth as it is. It is completely foolhardy to start such an unneeded project.

In talking to many Japanese visitors it is very evident that they don't even want a direct flight here, nor do Australians of whom I have many relatives, because they look forward to and enjoy the extra flight over here which gives the Hawaiian connection of music and flowers and lovely island people. As many have said "Like coming to two(2) different countries in one trip".

Please ask Maui Electric about the brown tree snake and how they could knock out all of our powers if they come here. Imagine what they could do to Plumeria trees, Kula strawberries and Haiku orchids.

On another note, no consideration have ever been given to the folks who lives at Spreckelsville and other places near the airport. We've heard it said too many times "Why did they move near the airport in the first place?". Those beautiful old homes has been there for many, many years and lately they have been fighting the noise of during the night cargo flights. In this so called age of "Precision Perfection" why not another route?

The Extension of Kahului Airport - pg. 2

My late husband Jimmy Lindsay was the first local born Ranger at Haleakala in the 40's through part of the 60's. Having graduated from the University of Hawaii in agriculture and botany, he was constantly looking for different bugs, etc., changes in the growth of everything and always the protection of the birds. I'm sure Superintendent Don Reeser and his Biologist Lloyd Loope are continuing on with that same work Jimmy loves so well - protecting Haleakala National Park.

Please reconsider this project and don't allow greed to ruin Maui. Thank You.

Sincerely,

Mrs. James C. Lindsay
Olinda

See Comment JCL-1

See Comment JCL-1

See Comment JCL-1

See Comment JCL-1

See Comment JCL-1



COMMENT JCL-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international services could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State

Mrs. James C. Lindsay
Mailing Address Unknown

Dear Mrs. Lindsay:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996, on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT JCL-1 - Effect of Project on Haleakala National Park

The Hawaii Department of Transportation (HDOT), Airports Division, has been working in cooperation with the Department of Interior National Park Service (NPS), as well as the Department of Interior Fish and Wildlife Service (FWS), other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the Federal Aviation Administration (FAA) and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the MPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact of the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT JCL-3 - Effects of Proposed Project on Maui's Infrastructure

The potential effects of the Proposed Project on Public Facilities, Infrastructure and Services, and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated in the Draft EIS, in general, the Proposed Project will have a beneficial effect on infrastructure components such as the road way system in and around the airport or not have an appreciable effect on infrastructure components, such as the electrical power

generation, wastewater collection, treatment and disposal system, or potable water system of the island. As indicated in Section 2 of the Draft EIS, the Proposed Project is in response to existing and forecast increase in aircraft operations and passenger levels. These increases will occur regardless of the Proposed Project.

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

COMMENT JCL-4 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interisland international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT JCL-5 - Alternative Airport Sites

Various alternatives to the Proposed Project, including alternative airport sites, are discussed in Section 4 of the Draft EIS. As indicated in the Draft EIS, the present airport site has been in use as an airport for several decades. The development of another airport at another site would be prohibitive and relocate potential noise, traffic and other effects to another area of the island.

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs are discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

May 9, 1996

COMMENT ON THE STATE-FEDERAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE KAHULUI AIRPORT EXPANSION

SUPPORT THE "NO-ACTION" ALTERNATIVE REGARDING RUNWAY LENGTHENING AND A PARALLEL RUNWAY

There have been many letters printed in the Maui News from tourists/visitors to Maui sharing their views and feelings of their stay on Maui. Never have I seen a complaint that the landing on Maui was bad, or that the transfer of planes on Oahu was an inconvenience. No, the majority of the people say they enjoyed their vacation, but find it difficult to make a return visit because of what development has done to the island's natural environment, the rise in vandalism, the crime stats, litter on the highways, the congested traffic, etc. People who come to Maui, come to respice from its natural surroundings of mountains and valleys, the flora and the fauna, the ocean, and above all, to be received and waited on with kindness and respect from the resident peoples.

There is no need for an extended runway on Maui at this time. Put the moneys into programs to help Hawaii's people live a life of caring for one other, and caring for its aina.

Thank you for your attention.

Mary Ann Lundquist

Ms. Mary Ann Lundquist
Mailing Address Unknown

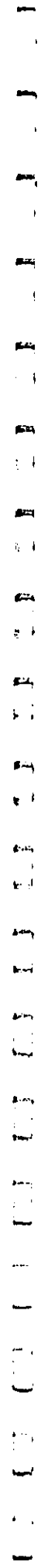
Dear Ms. Lundquist:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 9, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MAL-1 - Purpose of Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.



KAUAI
MAUI
HAWAII
Brien K. Minnai



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
860 FUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

IN HAWAIIAN LANGUAGE

POSTED
21 JUL

June 20, 1996

Gov Cayetano, Owen Miyamoto
State of Hawaii Office of Environmental Quality
220 South King Street
Honolulu, HI. 96813

96 JUN 25 AM 3:33

It would appear that the Kahului Airport Improvements draft EIS seeks to justify airport expansion while evading issues of international aviation impacts that would result from a substantial increase in tourism to Maui from foreign destinations. The document should not be used to make any planning decisions.

Where is our State coming from? The desirable core of this issue is to preserve the environmental well being of our island. How can the destructive damage subsequently brought to this island from international points be limited if your EIS does not address the simple subject of how many tourists Maui can successfully host while maintaining itself as a quality destination? Is it wise to demand more eggs like the Giant in Jack and the Beanstalk without any regard for the capacity of the goose?

I am reminded of a loading dock Hana fishermen didn't want built at the Hana pier. At first the State allowed their small voices, then it went ahead and built a loading dock which was too high out of the water to be used by most fishermen. The planning process failed to serve the people.

The same thing seems to be happening in the international airport issue. Any helpful information is extinguished by a one sided blind governmental process which has already decided to install an international airport by whatever deceptive means. The driving force is short term economic benefits of an international airport, not the preservation of the environment, or sound planning.

If you are one of the pilots trying to bring this international airport in to land on Maui, please pay careful attention to your elevation and approach. The wings are tipped too far to the economic right, while some of the most important environmental issues are evaded or simply dismissed by the subject Draft EIS. Consider all the "good" economic reasons that have stripped our oceans of fish in the last four decades, and made it hard for a Hana fisherman to catch a single mahi mahi. Haven't you noticed the warning light flashing on your instrument panel yet, with a voice saying, level out - pull up? Again, it is our observation that the Draft EIS provided by the Edward K. Noda and Associates for the "Kahului Airport Improvements" should not be used for any planning decisions because it circumvents discussion of the aforementioned environmental impacts. Thank you.

Terry and Stacy Lynch
P.O. Box 338
Hana, Maui, HI. 96713
ph: 1-808-248-8969

Mr. and Mrs. Terry Lynch
P. O. Box 338
Hana, Hawaii 96713

Dear Mr. and Mrs. Lynch:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. NM1011-07

Thank you for your comment letter of June 20, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT TL-1 - International Flight Operations

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to

have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interisland international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT TL-2 - Growth Inducing Impacts of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities

Mr. and Mrs. Terry Lynch
Page 5
August 20, 1997

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Mr. and Mrs. Terry Lynch
Page 4
August 20, 1997

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT TL-3 - Planning Decisions Based On EIS

The Kahului Airport Improvements EIS has been prepared in conformance with the National Environmental Policy Act and the State's Environmental Act, Chapter 343, Hawaii Revised Statutes. As with all EISs, this EIS is an informational document that is used as part of the decision making process. It is not in itself a decision making document. The EIS, along with many other documents, such as the aviation forecasts, will be used by the decision makers to determine which of the projects listed in the Draft EIS will move forward.

As indicated in the Draft EIS (see Section 2.1) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate

more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the Islands.

If you have any questions, please contact Ben Schiapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Wehhouse)

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97-937



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Jack Madden
2169A Liliko'i Road
Haiku, Hawaii 96708

Dear Mr. Madden:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your letter of May 6, 1996 in support of the proposed improvements to Kahului Airport. As described in the Draft EIS, the following is provided in response to your comments regarding the length of the proposed runway and the possibility of a space port on Maui. Your letter is attached for reference.

COMMENT JM-1 - Runway Length

The proposed runway length of 9,600 feet versus the present 7,000 foot runway is sufficient to allow direct flights to overseas airports without having to fly either to Honolulu for refueling or departing from Maui with a partial load.

COMMENT JM-2 - Space Port on Maui

As you may be aware, the State Administration tried unsuccessfully to establish a space port on the Island of Hawaii. However, due to community opposition, high costs, and the lack of a positive response from the U.S. Government or potential private operators, the idea has been dropped.

Should the residents of Maui desire a space port on Maui, we suggest you contact the Mayor and Governor and voice your support for such a facility.

BE KUMUJ CATI TANG
TANGINEN

MAY 6 1998

Jack Madden
2169A Liliko'i Rd.
Haiku, HI 96708
572-0594

Dear Sir,

The article in paper was wrong, a longer runway will not bring a crime wave, it's already here. What it will bring is less disgruntled visitors. They won't have to change planes in Honolulu. The convenience will bring happy visitors.

Frankly I don't know why you couldn't take the cane field out of central Maui and put 5 mile runways & get the government to do it. They could get the space program out of Florida where they are always having delays due to weather. Think of all the jobs that it would bring & the revenues would help the economy.

Sincerely,
Jack Madden

See
the
original
copy
of
this
letter

AIR-EN
97.937

Mr. Jack Madden
Page 2
August 2, 1997

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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MAY 21 1996

May 9, 1996

AIR-EN
97.957

COMMENT ON THE STATE-FEDERAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE KAHULUI AIRPORT EXPANSION

SUPPORT THE "NO-ACTION" ALTERNATIVE REGARDING RUNWAY LENGTHENING AND A PARALLEL RUNWAY.

There have been many letters printed in the Maui News from tourists/visitors to Maui sharing their views and feelings of their stay on Maui. Never have I seen a complaint that the landing on Maui was bad, or that the transfer of planes on Oahu was an inconvenience. No, the majority of the people say they enjoyed their vacation, but find it difficult to make a return visit because of what development has done to the island's natural environment, the rise in vandalism, the crime stats, litter on the highways, the congested traffic, etc. People who come to Maui, come to reap peace from its natural surroundings of mountains and valleys, the flora and the fauna, the ocean, and above all, to be received and waited on with kindness and respect from the resident peoples.

There is no need for an extended runway on Maui at this time. Put the moneys into programs to help Hawaii's people live a life of caring for one other, and caring for its aina.

Thank you for your attention.

Carole Mahan

Ms. Carole Mahan
Mailing Address Unknown

Dear Ms. Mahan:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 9, 1966 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT CM-1 - Purpose of Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes for the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the Islands.

DEPARTMENT OF TRANSPORTATION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MAJORITY SHARE
DIRECTOR
INVESTIGATION
OFFICE OF THE ATTORNEY GENERAL
BRIAN K. MINAMI

MINISTER TO
AIR-EN
97.1057

August 20, 1997

Mr. and Mrs. Jonathan Mann
696 Onipaa Place
Makawao, Hawaii 96768

Dear Mr. and Mrs. Mann:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 13, 1996, on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT JM-1 - National Park Service (NPS) Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the Federal Aviation Administration (FAA) and the State of Hawaii, Department of Transportation (HDOPT), Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and the HDOPT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment

May 13, 1996

Dear Sir,

Regarding the state-Federal DEIS for the Kahului, Maui, HI airport expansion:

I believe the National Park Service was wrongly denied cooperating Agency status.

I also support the "NO-Action" alternative regarding the lengthening of the runway and building a parallel runway.

Thank You.

Jonathan & Betty Mann

Jonathan Mann
696 Onipaa Place
Makawao Maui HI 96768

CC. Owen Miyamoto
Gov. Cayetano
FAA

RECEIVED

MAY 17 1996

LAW OFFICE OF JONAS & ASSOCIATES

See Comment JM-1
See Comment JM-2

Mr. and Mrs. Jonathan Mann
Page 2
August 20, 1997

AIR-EN
97.1057

Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT JM-2 - Purpose of Proposed Project and Alternatives

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the Islands.

Various alternatives to the Proposed Project, including alternative airport sites, are discussed in Section 4 of the Draft EIS. As indicated in the Draft EIS, the present airport site has been in use as an airport for several decades. The development of another airport at another site would be prohibitive and relocate potential noise, traffic and other effects to another area of the island.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DEANAMU J. CALELANDO
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PURCHOWL STREET
HONOLULU, HAWAII 96813-5097

KAZUYASADA
THE CITY
PLANNING DIRECTOR
FELIX M. UEMOTO
BRIAN K. MINAMI

WIRE REPORT
AIR-EN
97-818

August 20, 1997

Ms. Martha E. Martin
P. O. Box 296
Paia, Hawaii 96779

Dear Ms. Martin:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MEM-1 - Airport Noise

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction, and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

Brian J. Folie
Edward K. Mada & Associates
65 N. Pihai St., Ste 300, Hanaula, HI 96814
I support the NO ACTION alternative regarding runway lengthening and a parallel runway at the Kahului Airport, in regards to the DEIS for the Kahului Airport Expansion.

Since 1963 I have been a property owner and full time Maui resident. Lengthening the airport runway will have terribly detrimental effects on Maui. Airport noise will be hideously obnoxious to residents of Kahului, Spreckelsville, and Paia. Kahului schools will be especially threatened.

Alan species invasion is a serious worldwide problem. The arrival of new alien pests will occur either by accident or deliberate introduction if the runway is lengthened. New human diseases and serious threats to local flora and fauna will inevitably deteriorate Maui living.

Increased visitor arrivals will have island-wide impact on transportation, food supply, water demand, temporary housing, and garbage disposal. Our island has limits to the supply. Our medical facilities are not able to respond to a massive airport disaster.

The arrivals and departure of planes on the existing runway are safe, or the FAA would not allow them to continue now. However, the present impaction of incoming arrivals is not safely monitored for present control of alien imported species. The airport inspection for outgoing traffic is much stricter presently. The airport needs to immediately begin thorough inspection and preventative measures against incoming introductions to Maui.

For the reasons above, I urge that no action be taken on lengthening the Kahului Airport runway and no action be taken on a parallel runway.

Sincerely,
Martha E. Martin

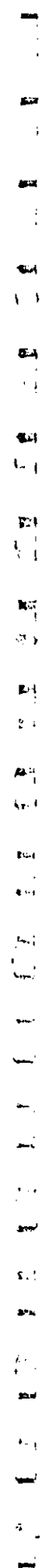
P.O. Box 296
Paia, Maui, HI 96779

RECEIVED

MAY 28 1996

EDWARD E. BORA & ASSOCIATES

May 22, 1996



COMMENT MEM-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 6.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the

Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT MEM-3 - Impact on Infrastructure

The potential effects of the Proposed Project on the airport area infrastructure are discussed in detail in Section 3.22 of the Draft EIS. Additionally, a detailed analysis of the infrastructure requirements for Kahului Airport is presented in Appendix L to the Draft EIS. A traffic impact report is presented in Appendix M and P, and an aviation safety analysis is presented in Appendix N.

Ms. Martha E. Martin
Page 4
August 20, 1997

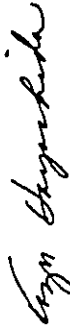
In general, based on the various analyses performed, the Proposed Project will have positive, insignificant or negligible effects on the water and wastewater systems, telecommunications systems, police, fire and security services, health care services, schools, and recreational facilities of the island. Similarly, for the most part, the proposed roadway improvements will result in positive effects on the roadway system in the vicinity of the airport. There will be significant traffic effects at some intersections, but these effects will occur with or without the Proposed Project as a result of natural growth of the island.

COMMENT MEN-4 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DE LUJAN J. CAYETANO
GOVERNOR

HAZUAYASHIMA
DIEZEL
REPRINTS/COPIES
ALEXANDER OKAMOTO
BRIAN K. MIJARA



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

WIRE/YELLOW
AIR-EN
97.940

20/June/1996

Joe E. Masters
DoD
PSC 3 Box 2218
APO AE 09021

David Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850-0001

Dear Sir:

In recent Maui News, I have read several articles pertaining to runway extension. My family and I have been visiting Maui yearly, for many many years. I think that the county has done an outstanding job of controlling unwanted plants, growth, high rise, as well as visitors. The way the airport was in the past without the jetways and the honey atmosphere that greeted visitors is no longer. Again, people push for what they see as economic growth. I disagree with the extension of the runway.

In terms of looking at this problem, economically, it is a fact that this would provide jobs to the public and more funds in the coffer. I see this as a temporary advantage to the people of Maui County. What I do see happening is more environmental problems, i.e. trash, more automobile emission; temporary increase of visitors to Maui; and temporary increase of funds. What must be remembered is what happens to Maui when there is a recession, visitors decline?

Is it certain that the big airline companies will, for years to come, offer more services to Maui? What will be the total impact on the residents of Maui? Increase of passengers to the island will occur with larger aircraft, but will present services be curtailed or discontinued because of the larger crafts meaning that passengers could be put on fewer planes. There are advantages to runway extension, however, the disadvantages out weigh those in the long run.

Joe E. Masters

Mr. Joe E. Masters
DoD
PSC 3 Box 2218
APO AE 09021

Dear Mr. Masters:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

August 20, 1997

Thank you for your comment letter of June 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT JEM-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including the The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

See Comment JEM-1

See Comment JEM-1

Mr. Joe E. Masters
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August 20, 1997

information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT JEM-2 - Socio-Economic Effects of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.5 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not

Mr. Joe E. Masters
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August 20, 1997

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international services could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the

Mr. Joe E. Masters
Page 5
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inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Weihouse)

Mr. Joe E. Masters
Page 4
August 20, 1997

part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth

May 20, 1996

To: U.S. D.O.T. - Federal Aviation Administration
HAWAII D.O.T. - Airports Division
HAWAII - Office of Environmental Quality Control

From: Professor Dick Mayer, Economics and Geography Tel: 242-1274
Maui Community College Kahului, Maui, HI 96732 Fax: 242-1251

RE: FEDERAL/STATE D.E.I.S. - KAHULUI AIRPORT **COPY**

CONTENTS:

- I) Some general comments
- II) General comments about the D.E.I.S. and its basic assumption
- III) A list of issues, questions, and concerns that need to be further discussed or included in a FINAL D.E.I.S.

I) SOME GENERAL COMMENTS

1.) The views that I express below are my own and not necessarily those of my employer, the State of Hawaii and the University of Hawaii.

2.) I was disturbed that you lost the detailed written comments that I had prepared and given to you at the scoping meeting in May 1994. In the two years since then, you did not give me the courtesy of requesting a duplicate copy. Instead of contacting me, you mailed me a regrets letter (see attached) AFTER the D.E.I.S. was prepared.

3) For approximately 18 years I reviewed E.I.S. documents for the Environmental Center at UH Manoa. During that period I never saw an E.I.S. that was so obviously biased and unfair to the spirit of the E.I.S. legislation as the 1991 State Kahului Airport E.I.S. It was nothing more than a one-sided defense of the expansion of the Kahului Airport. It seemed more the product of a hired P.R. firm than from a reputable E.I.S. organization. In that document there was only a token attempt made to provide a neutral unbiased environmental assessment of the positive and negative impacts of the proposed project. Rather it was a one-sided prejudiced defense of the project. It was not an E.I.S. as envisaged in the original legislation.

I had hoped that this 1996 Federal/State D.E.I.S. would be an improvement. Unfortunately it literally and physically (22.5 lbs.) expanded on the problems of its predecessor. The sheer size of the document in no way should be considered to be a quality assessment of the environmental impact of the proposed project. As a professor, I read many weak student essays that dispense B.S. instead of real substance. This D.E.I.S. document parallels the efforts of my weaker students. In fact, the D.E.I.S. makes it very difficult for reviewers to detect the actual environmental impact of the proposed airport expansion.

II) GENERAL COMMENTS ABOUT THE D.E.I.S. AND ITS BASIC ASSUMPTION

THE FEDERAL/STATE D.E.I.S. MAKES A MAJOR INCORRECT ASSUMPTION
The D.E.I.S. points out correctly that if internationalization occurs, there will be major changes in Maui's tourist count, population, housing needs, etc. (Vol. #1, Sect.6, pp 8-9)
The D.E.I.S. then assumes INCORRECTLY that "The likelihood of (internationalization) occurring appears, at this time, to be rather small." (Vol. #1, Sect.6, pp 8)

FEDERAL/STATE D.E.I.S. - KAHULUI AIRPORT Dick Mayer Page 2

Why is that assumption about internationalization incorrect? Internationalization will not be under the control of Maui County once the airport runway is lengthened. We only have to see what has been happening with Kona Airport. Decisions are being made in Washington (by the State Department), in Chicago (by United Airlines), and in Tokyo (by the Japanese Government and by Japan Airlines). Please see the following article from the Honolulu Advertiser (printed after the D.E.I.S. was prepared) which says that the Mayor of the Big Island learned about the decision from United Airlines. Note also that the extensive lobbying efforts of Gov. Ben Cayetano were made to get direct flights to Kona. Would he not try to do the same when Kahului Airport's runway is lengthened?

Furthermore, if a city such as Winnipeg, Tokyo or Vancouver has direct flights to/from Kahului's lengthened runway, there will be a substantial increase in the advertising spent by the airlines, the Hawaii Visitors Bureau, and the Maui Visitors Bureau to woo residents of the respective cities and surrounding areas. The expectations of the advertisers will be that many more prospective visitors will fly directly to Maui. Many residents of those cities who might previously have spent time on Guam, Mexico, or Oahu will be able to fly directly to Maui. Undoubtedly, the additional promotion emphasizing the ease of flying directly to Maui will result in a significant increase in the number of tourists coming to Maui.

Unfortunately, those considerations were ignored when the underlying assumption of the D.E.I.S. was formulated. Since we must correctly assume that there will be a sizeable increase in the passenger volume to Maui as a direct result of the expanded capabilities of the Kahului Airport, then the D.E.I.S.'s assumption is unreasonable, and consequently much of the D.E.I.S.'s socio-economic discussion is invalid.

Furthermore, the D.E.I.S. recommends that Maui County should take action to stop the growth caused by the Kahului Airport expansion; it will need to do something to protect Maui from the consequences of the expansion. Isn't that a significant impact? It implies that the County should modify its Community Plans that were drawn up by many citizen groups over a protracted 4-6 year period, to change zoning, to regulate building permits, and to pass ordinances that declare a moratorium on hotel construction, etc. All of that would take time, effort and dollars. Why is there no mention in the D.E.I.S. of these impacts, disruptions and difficulties?

Based on an incorrect assumption, the D.E.I.S. over and over mistakenly assumes throughout its five volumes that the lengthening of the runway will have little effect on the growth of Maui's population or on the number of tourists who would come to Maui. Therefore the actual environmental effects of the proposed airport expansion have been underestimated in the D.E.I.S.

Having dismissed growth of population and tourists so quickly and trivially, the Draft D.E.I.S., not surprisingly, finds few socio-economic impacts. The Final E.I.S. must consider the impact on Maui of a population growth of 9%-18% (that is an increase of 10,000 to 19,000 people); of additional housing units; and the addition of all other kinds of infrastructure that will result from the Kahului Airport expansion.

4.3.3 Impacts Of Internationalization On Growth

Internationalization could occur only with runway lengths of at least 8,500 feet, since shorter runway lengths could not accommodate most current large-bodied long-haul aircraft to Japan (the only country generating enough foreign visitors to Maui to warrant attention in this analysis).

Based on the preponderance of available evidence, the SIAR concluded that any near term growth in international tourism on Maui would not be large. Japanese tourism still represents a fairly small, if growing, part of Maui's visitor industry, and virtually all industry experts who were interviewed for the report concluded that initial consequences would be limited to a few flights a week, and these might just be serving the current market.

Beyond that, the SIAR determined that actual impacts are virtually unmeasurable at this point in time, although there is a greater potential for growth-inducing impacts from the introduction of international nonstop flights than from domestic flights.

Still the future is cloudy with regard to international flights for a number of reasons. First and foremost, bilateral international political approvals are required for any new international routes, and many other American cities would probably contest additional routes to Hawaii. In addition, other international political and economic factors could affect monetary exchange rates, which are very important determinants of international tourism.

Internationalization, that is, allowing unlimited international flights to be processed at Kahului Airport, would require the staffing of customs and immigration and motorization services by the federal government. The likelihood of this occurring appears, at this time, to be rather small. However, should it occur within the planning and analysis timeframes for this EIS, and should additional hotel permits be granted by local authorities, then the following likely quantifiable cumulative effects, as compared to the No-Action alternative, may result:

Visitor arrivals could increase by about 11 percent over the "Unconstrained No-Action Future" baseline and about 21 percent over the "Constrained No-Action Future" baseline. The visitor

count for both the "Unconstrained and Constrained No-Action Futures" are less than predicted in the SASP forecast by 3 percent.

The average visitor census could increase about 8 percent over the "Unconstrained No-Action Future" scenario and 19 percent over the "Constrained No-Action Future" scenario;

The number of occupied visitor units would increase 8 percent over the "Unconstrained No-Action Future" scenario and 19 percent over the "Constrained No-Action Future" scenario;

The number of civilian jobs would increase 9 percent under the "Unconstrained No-Action Future" scenario and 18 percent under the "Constrained No-Action Future" scenario.

The resident population would increase 9 percent over the "Unconstrained No-Action Future" scenario and 18 percent over the "Constrained No-Action Future" scenario, and

The number of housing units would increase 9 percent over the "Unconstrained No-Action Future" scenario and 18 percent over the "Constrained No-Action Future" scenario.

In addition to the above, it is estimated that the increase in resident population resulting from internationalization would generate a corresponding increase in the demand for public services, such as police and fire protection. To accommodate the potential increase in visitors estimated in the SIAR, additional hotel permits would be needed. Growth then would depend on the local authorities' decision to permit expansion of resort facilities on Maui.

PLUS 10,000 TO * ->

PLUS 19,000 POPULATION

6-9

THIS WOULD REQUIRE CHANGES IN HAWAII COUNTY'S LAWS.

FEDERAL/STATE D.E.I.S. - KAHULUI AIRPORT Dick Mayer
This page shows where the D.E.I.S. predicts that sizeable and significant growth of Maui's population and tourist count will occur if the Kahului Airport expansion is constructed and internationalization takes place. The following is taken directly from the D.E.I.S. (Vol #1, sect.6, pp 8-9). The pen markings are my effort to highlight the more significant numbers.

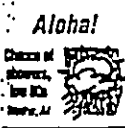
Olujuwon's 30 points send Rockets past Lakers Sports, CI



In May, television 'sweeps' you away Island Life, DI



Hawaii Regional Cuisine - 5 years later



The Honolulu Advertiser

WEDNESDAY May 1, 1996 Neighbor Island Edition Beyond Oahu 75¢

Tokyo-to-Kona flights approved

Japan Airlines poised to bring 40,000 tourists a year to Big Island

By Hugh Clark
Advertiser Big Island Bureau
HILLO, Hawaii — Japan Airlines will begin Maui-to-Kona flights as early as Friday, after negotiators in Washington broke a months-old impasse.

The JAL flights to the Keahole airport in Kona, scheduled for three a week, could bring 40,000 visitors a year directly to the Big Island.

It's good news for an island facing a downturn in tourism and the loss of its three remaining sugar plantations in as many years. In January, Japan Airlines announced it would begin non-

stop Tokyo-Kona service April 1. And the airline launched a \$5 million campaign to promote the Big Island in Japan. Japanese tour operators worked out details for shuttling up to 1,200 new visitors a week from hotels to shopping centers and Big Island points of interest.

But opposition to JAL's Kona flights mounted in Washington. United Airlines and other U.S.

airlines urged U.S. transportation officials not to approve any new routes for JAL until Japan approved requests from U.S. airlines.

JAL's Kona route had become linked to United's request to fly from Osaka to Seoul. On March 23, three days before the scheduled Tokyo-Kona inaugural flight, JAL said it would have to delay the service because U.S. officials

had not approved the route. Yamashiro said the agreement was reported to him by Shelby Longmire, United Airlines' government affairs representative.

In the agreement, United won the right to fly directly from Los Angeles to Tokyo and between Osaka and Seoul. Advertiser Staff Writer Stu Olesberman contributed to this report.

Oil firms face price inquiry Panel to check for



De-bugging the palace

Hawaiians rank No. 2 in cancer

III) A LIST OF ISSUES THAT SHOULD BE DISCUSSED, QUESTIONS THAT SHOULD BE ADDRESSED, AND CONCERNS THAT SHOULD BE RESOLVED IN THE FINAL E.I.S.

- A. Include projections of the actual increase in the number of U.S. tourists that would be added to the passenger volume of Kahului Airport as a result of direct flights from such areas as the mid-west and eastern half of the U.S. Do not make the unrealistic assumptions that there would be no effect resulting from the runway extension. Efforts by the hotel industry to have the runway expanded are testimonials to the unrealistic assumptions of the D.E.I.S.
- B. The impact on all the other airports in the State is needed since direct flights will affect all of the other State airports. A special concern is the impact on Honolulu Airport because Maui-bound foreign and domestic passengers will be entirely able to avoid having to change planes in Honolulu. The Final E.I.S. must discuss the decreased passenger volume at Honolulu Airport (both domestic and international) resulting from the direct flights to Maui. Consideration must be given to both the impact on commercial activity (stores, car rentals, taxis, etc.) and to the financial impact on the Revenue Bonds that have been utilized to fund the HNL airport.
- C. Because of the population increase resulting from internationalization, specific attention must be focused on the socio-economic impacts of the expansion of Kahului Airport on the residents of Maui:
- (1) The increased costs of housing for all the local people who will now compete against the newcomers for labor and materials;
 - (2) Higher housing costs that will result from the inflationary effects of increased construction at the Kahului Airport;
 - (3) Quantity of affordable housing that will decrease as more people move to Maui to work in the growing tourist industry that will result from the direct flights from cities further away;
 - (4) Pressure on family life that results from the over-heating of the economy and the subsequent need of both parents to work, often at two jobs each. There is a very high rate of latchkey children due to the effects of very high prices in relation to lower wages. The proposed project may exacerbate these problems.
- D. Direct flights from the mainland and possibly from Mexico or the Philippines may threaten the local vegetable and dairy industry because it will mean that produce from low labor cost areas will have direct access to the high land and wage cost Maui produce market. Local vegetable and dairy farmers will be impacted. Where is this discussed?
- E. The "safety issue" is largely a result of the desire of some to extend the runway and to allow larger aircraft. If present inter-island carriers were to continue, then there would be no safety issue. And if the runway expansion allows for larger planes, then there will be no "safety improvement" in fact there may even be a decrease in safety. What is the story on this?

F. The subsequent impacts of the increased passenger volume from Kahului Airport on ALL of Maui's major infrastructure systems and facilities:

- (1) What are the costs of new and wider highways and interchanges, resulting from increased traffic not only in the vicinity of the airport but also in many other parts of the Island of Maui?
 - (2) What are the demands on Maui Electric to install greater electricity generation capacity with special reference to the probable increased electricity costs to existing residential and commercial consumers resulting from the higher volume of electricity needed? Because of the shortage of power generating capacity on the island of Maui and the cost to the rate payers of Maui of the construction of the additional generating capacity needed to support the larger airport, the marginal cost of construction will probably be considerably higher than the average costs.
 - (3) What are the Costs of making Maui Memorial Hospital capable of handling the eventuality of an airplane crash given the fact that the hospital at present is operating at capacity.
 - (4) Serious consideration must be given to the increased dependence of Maui Island's economy. The future health of Maui will become increasingly dependent on: a) the tourist industry's cyclical fluctuations; b) the rising cost of jet fuel which may someday soon limit the tourist industry because of the Airplane's total dependence on jet fuel costs. If the Kahului Airport is expanded, it will raise the proportion of Maui Island's workforce and families who will depend on the tourist industry to unhealthy levels.
- G. The specific problems resulting from the two related issues of loss of Maui's self-rule of this island (the so called "home rule issue") and Hawaiian sovereignty.
- (1) The construction of a longer runway and the internationalization of Kahului Airport will both shift the decision making authority of the people and Maui County government to off-island locations, people, and entities. For example the control of the use of the lengthened airport will evolve to United and Delta airlines and the FAA; Maui will not be able to limit or regulate this traffic, even if Maui County's Mayor or County Council or people wanted to. Similarly internationalization will transfer local control to the federal government and possibly even foreign governments and airlines if the federal government should surrender some of its regulatory authority.
 - (2) Hawaiians on Maui, for the reasons mentioned immediately above, will further see their sovereignty compromised. What will be the socio-economic impact on Hawaiians, their culture, and their special rights?
- H. The internationalization of the airport will severely impact Maui's local wholesale and retail trade. A duty free store will probably be established at Kahului Airport, but this is not mentioned in the D.E.I.S. A duty free store will drain a large volume of retail revenue and profits from the local community. Estimates of the effect on Maui's business community of this impact must be presented.

May 18, 1994

FEDERAL AVIATION ADMINISTRATION

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FEDERAL STATE D.E.I.S.--KAHULUI AIRPORT

Dick Mayer

TO: Professor Dick Mayer, Economics and Geography
From: Maui Community College Kahului, Maui, HI 96732

Tel: 242-1274

Fax: 242-1251

RE: Scoping Meeting FEDERAL E.I.S.--KAHULUI AIRPORT MASTER PLAN
The views that I express below are my own and not necessarily those of my employer, the State of Hawaii and the University of Hawaii.

I would first like to make some comments relative to the previous unsuccessful effort by the State of Hawaii's Department of Transportation to prepare a State E.I.S. Thereafter I would like to suggest a partial list of issues that should be discussed, questions that should be addressed, and concerns that should be resolved.

With regard to the State of Hawaii's Department of Transportation E.I.S., I would like to offer the following observations in the hope that the State's E.I.S. will NOT serve as a basis for the Federal E.I.S.

For approximately 18 years I have reviewed EIS documents for the Environmental Center at UH Manoa. During that entire period I never saw an EIS which was so obviously biased and unfair to the spirit of the EIS legislation. The State EIS was nothing more than a one-sided defense of the expansion of the Kahului Airport. It seemed more the product of a hired P.R. firm than from a reputable E.I.S. organization. There was only a token attempt made to provide a neutral unbiased environmental assessment of the positive and negative impacts of the proposed project. Rather it was a one-sided prejudiced defense of the project. It was NOT an EIS as envisaged in the original legislation.

The EIS made a major and I strongly believe incorrect assumption. It assumed that the lengthening of the runway would have no effect on the number of tourists who would come to Maui. That assumption, which underlay both the main document and the appendices, neglected to consider an obvious increase in the number of tourists who would fly directly to Maui if they could get direct flights to Kahului Airport.

Let me explain that assertion. If a city such as Denver or Tokyo or Vancouver had direct flights to Maui, there would be a substantial increase in the advertising spent by the airlines, the Hawaii Visitors Bureau and the Maui Visitors Bureau toward wooing residents of the respective cities and surrounding areas. The expectations of the advertisers would be that many more prospective visitors would fly directly to Maui. Many residents of those cities who might previously have spent time on Guam, Mexico, or Oahu would be able to fly directly to Maui. Undoubtedly, the additional Maui promotion emphasizing the ease of flying direct to Maui would result in a significant increase in the number of tourists coming to Maui. Unfortunately, those considerations were not made when the underlying premise of the EIS was formulated. Since we must assume that there would be increased passenger volume to Maui as a direct result of the expanded capabilities of the Kahului Airport, then the State's E.I.S. assumptions were unreasonable, and consequently almost the entire E.I.S. was invalid.

Given the dismal record in the preparation of the above mentioned State E.I.S., I request that entirely new parties prepare the Federal E.I.S.

I. Specific problems will result from internationalization:

(1) Importation of exotic species, ranging from minor pests to brown tree snakes, from crop crippling viruses to insects and rodents that could have serious repercussions for both plantation and diversified agriculture;

(2) Direct flights would allow for the easier transport of unwanted criminals and drugs from both sides of the Pacific. Will the Maui Police Department be able to interdict the increased inflow of drugs to the County; and what will be the additional costs of that police activity?

J. If we do not extend the runway and have a "no build" option, much of the commercial cargo (Maui-grown flowers and vegetables) operations at Kahului Airport can probably be handled quite adequately through the use of a separate all-cargo aircraft operating on a regular 2-4 times per week schedule. There is no need to try to fit the needs of the vegetable/pineapple/flower growers into the passenger traffic. The all-cargo planes could easily use the present 7,000 foot runway. Ideally a carrier (public or private) could provide regular all-cargo traffic from each of the neighbor islands on a one to three times a week schedule.

K. Major attention must be paid to the viability of the existing inter-island carriers, their employees, and their present use of existing airport facilities. If the direct and foreign flights are initiated then carriers, local employees, and presently occupied space will be jeopardized.

L. In the E.I.S. discussion of alternatives, there should be considerable attention paid to improving inter-island passenger and freight traffic so as to determine the feasibility of NOT building the extended runway.

M. The island of Maui has been voted the "Best Tropical Island" by a major tourist publication. This honor is based on the beauty and tranquility of the island. The expansion of Kahului Airport will set forces in motion that will ruin Maui's prestigious designation. More tourists, more traffic, etc. will destroy Maui's well deserved reputation. Or in the words of the ancient Hawaiian proverb,

"Mass tourism will kill the Nene, that lays Maui's golden egg!"
And won't the hotels, and the workers, and the tax collectors be sorry that the airport was allowed to be expanded???

Talk about impact on the environment.....

.....

.....

Now I would like to suggest a partial list of issues that should be discussed, questions that should be addressed, and concerns that should be resolved in the Federal E.I.S.

1. Include projections of the actual increase in the number of tourists that would be added to the passenger volume of Kahului Airport as a result of direct round-trip flights from such areas as the western half of the U.S., western Canada, Japan, China, South Korea, etc. Do not make the unrealistic assumptions that there would be no effect resulting from the runway extension or internationalization. Efforts by the hotel industry to have the runway expanded and to internationalize Kahului Airport are testimonials to the unrealistic assumptions of the previous State E.I.S.
2. The decreased passenger volume at Honolulu Airport (both domestic and international) resulting from the direct flights to Maui (Consideration must be given to both the impact on commercial activity (stores, car rentals, taxis, etc.) at HNL airport and to the financial impact on the Revenue Bonds that have been utilized to fund the HNL airport.);
3. The effect on all the other airports in the State is needed since direct flights will impact all of the other State airports.
4. Specific E.I.S. attention must be focused on the socioeconomic impacts of the expansion of Kahului Airport on the residents of Maui:
 - a. The increased costs of housing for all the local people who will now compete against the newcomers for labor and materials;
 - b. Higher housing costs that will result from the inflationary effects of increased construction at the Kahului Airport;
 - c. Quantity of affordable housing that will decrease as more people move to Maui to work in the growing tourist industry that will result from the direct flights from cities further away;
 - d. Pressure on family life that results from the over-heating of the economy and the subsequent need of both parents to work and often at two jobs. There is a very high rate of latchkey children due to the effects of very high prices in relation to lower wages. The proposed project may exacerbate these problems.

5. The subsequent impacts of the increased passenger volume from Kahului Airport on ALL of Maui's major infrastructure systems and facilities:

- a. Highways, intersections, and traffic will all see sizeable increases not only in the vicinity of the airport, but in many other parts of the Island of Maui.);
 - b. Demands on Maui Electric to install greater electricity generation capacity with special reference to the probable increased electrical costs to existing residential and commercial consumers resulting from the higher volume of electricity needed (Because of the shortage of power generating capacity on the island of Maui and the cost to the rate payers of Maui of the construction of the additional generating capacity needed to support the larger airport, the marginal cost of construction will probably be considerably higher than the average costs.);
 - c. Costs of making Maui Memorial Hospital capable of handling the eventuality of an airplane crash given the fact that the Hospital at present is operating above capacity;
 - d. Serious consideration must be given to the increased dependence of Maui Island on the tourist industry's cyclical fluctuations (If the Kahului Airport is expanded, it will raise the proportion of Maui Island's workforce and families who will depend on the tourist industry to unhealthy levels.);
 - e. Water supply issues must be discussed thoroughly.
6. The specific problems resulting from the dual related issues of loss of Maui's self-rule of this island (the so called "home rule issue") and Hawaiian sovereignty.
- a. The construction of a longer runway and the internationalization of Kahului Airport will both shift the decision making authority of the people and Maui County government to off-island locations, people, and entities. For example the control of the use of the lengthened airport will evolve to United and Delta airlines and the FAA: Maui will not be able to limit or regulate this traffic, even if Maui County's Mayor or County Council or people wanted to. Similarly internationalization will transfer local control to the federal government and possibly even foreign governments and airlines if the federal government should surrender some of its regulatory authority.
 - b. Hawaiians on Maui, for the reasons mentioned immediately above, will further see their sovereignty compromised.

7. Specific problems will result from internationalization:
- Importation of exotic species, ranging from minor pests to brown tree snakes, from crop crippling viruses to insects and rodents that could have serious repercussions for both plantation and diversified agriculture;
 - Direct flights would allow for the easier transport of unwanted criminals and drugs from both sides of the Pacific (In the previous State E.I.S. there was a reference on page 16 to the Maui Police Department being able to interdict the increased inflow of drugs to the County; however the E.I.S. makes no reference to the additional costs of that Police activity. What are the costs?);
 - The previous E.I.S. utilized the words "overseas" and "international" as if they were interchangeable. They are not. Oahu and California are "overseas".
 - The previous E.I.S. ignored the Canadian visitor market which is a most significant part of the Maui Visitor industry. It is an "international" market and distinct from the U.S. mainland market. This is particularly significant because an international airport and the lengthening of the runways would probably increase the already strong influx of Canadian tourists. This of course would further erode the basic assumption referred to at the beginning of my letter and which underlay the whole previous E.I.S.
8. Much of the commercial cargo operations at Kahului Airport can probably be handled quite adequately through the use of a separate all-cargo aircraft operating on a regular 2-4 times per week schedule. There is no need to try to fit the needs of the vegetable/pineapple/flower growers into the passenger traffic. The all-cargo planes could easily use the present 7,000 foot runway. Ideally a carrier (public or private) could provide regular all-cargo traffic from each of the neighbor islands on a one to three times a week schedule.
9. The internationalization of the airport will severely impact Maui's local wholesale and retail trade. Inevitably a duty free store will be established that will drain a large volume of retail revenue and profits from the local community. Estimates of the effects of this impact must be presented.
10. Direct flights from the mainland and possibly from Mexico or the Philippines may threaten the local vegetable industry because it will mean that produce from low labor cost areas will have direct access to the high land and wage cost Maui produce market.

11. The "safety issue" is largely a result of the desire of some to extend the runway and to allow larger aircraft. If present inter-island carriers were to continue, then there would be no safety issue.
12. Major attention must be paid to the viability of the existing inter-island carriers, their employees, and their present use of existing airport facilities. If the direct and foreign flights are initiated then carriers, local employees, and presently occupied space will be jeopardized.
13. In the E.I.S. discussion of alternatives, there should be considerable attention paid to improving inter-island passenger and freight traffic so as to determine the feasibility of NOT building the extended runway.



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAHULULU OFFICE
DEPARTMENT OF TRANSPORTATION
GUYANA CHAMBERLAIN
BRIAN K. NINANI

REPLY TO
AIR-EN
97.1114

Professor Dick Mayer

Page 2

August 20, 1997

AIR-EN
97.1114

the Proposed Project. Also, the statement in the Draft EIS refers to internationalization which is defined as "unlimited international flights". The commentator is incorrect, in that international service is currently not under the control of Maui County nor the State of Hawaii, Department of Transportation (HDOT), Airports Division, or the Federal Aviation Administration (FAA) for that matter, with or without the Proposed Project.

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in 8.2.1. (See attachment "internationalization")

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis. Currently, with the existing runway, Kahului is accommodating direct flights from and to Vancouver, Canada.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years.

Professor Dick Mayer
Economics and Geography
Maui Community College
310 Kaahumanu Avenue
Kahului, Hawaii 96732

Dear Professor Mayer:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comments on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your letter of May 20, 1996 and your written scoping meeting testimony on May 18, 1994. Your letter and scoping testimony are attached for reference.

COMMENT DM-1 - EIS Biased and Unfair

We strongly disagree with your opinion that the EIS is "so obviously biased and unfair". The EIS was prepared in an objective manner using applicable, well established and accepted analytical and scientific techniques. In addition, the criteria used to evaluate the potential effects were developed to objectively measure the potential short-term and long-term environmental effects of the proposed project and alternatives. However, your comments will be made available to the decision makers prior to the final decision of the proposed project.

COMMENT DM-2 - Internationalization of Kahului Airport

Your comment disagreeing with the sentence in the Draft EIS regarding the likelihood of internationalization will be made available to the decision makers prior to the final decision on

The changes in passenger volumes from different U.S. areas are discussed in Section 6.0 of the Draft EIS and in Appendices E and N. Contrary to your opinion about "unreasonable assumption", no assumptions were made as to the growth impact. A detailed analysis has been provided in the Draft EIS, especially in Appendix E, regarding the growth analysis for the runway extension.

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

The information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations would cause an increase in the number of visitors coming to Maui and, by the extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that permanent international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate

Direct control of the number of hotel rooms and the subsequent control of the number of tourists is a purview of the County of Maui. The passenger forecast for the Hawaii Statewide Airport System Plan, updated in October 1994, was based upon the total system capacity of the Hawaii State Airport System and assumed the State Airports would have adequate facilities to meet future demand.

Regarding the growth and socio-economic issues, please refer to Comment DM-3, below. You are incorrect in assuming that there was a basic assumption of no-growth. As stated in the Draft EIS, Section 6.0, the conclusion of the growth inducing analysis was that the Proposed Project, without internationalization (unlimited flights), would result in no or little growth impacts due to the Proposed Project. It also concluded with respect to internationalization, that the near-term growth in international tourism would not be large. We disagree with your comment that the growth of population and tourists were dismissed so quickly and trivially. As described in the Draft EIS, the analysis for socio-economic and growth issues included several methodologies, interviews, and a review of past studies. However, your comment will be made available to the decision makers prior to a final decision on the Proposed Project.

The EIS did analyze the growth impacts of the internationalization in Section 8.2.5 and Appendix E of the EIS.

COMMENT DM-3 - (III) List of Issues that should be discussed.

A. Increase in the number of U.S. Tourists

We disagree with the underlying premise assumed by the commentator that the Proposed Project will cause significant growth impacts. The following are specific responses to your comments:

Projections made by the Hawaii Statewide Airport System Plan (SASP) were updated in October 1994 with the "Updated Aviation Demand Forecast," and reflected the most current projections of passengers expected at Kahului Airport through the Year 2020. The 1994 updated aviation forecasts included both international and mainland passengers categories. One of the purposes of the SASP was to project the potential number of passengers to determine the need for facilities to accommodate the passengers. Thus, the projections as such do not assume a "lengthen runway" as a factor in making a projection of passengers.

significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project.
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis --- despite producing growth numbers which could be judged technically "significant" --- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The

SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

The SIAR also includes a complete description of its methodology and assumptions.

- B. Impact on all the other airports in the State, especially Honolulu International Airport

The effect on the other airports, especially Honolulu International Airport has been discussed in Sections 2.3.2 and 3.6, and Appendix E of the Draft EIS. The updated aviation demand forecast for the State completed a forecast for the total Hawaii Airport System for planning the future facilities required for each airport and the interaction of the various airports within the system and the added or deducted effect of direct flights into the various neighbor island airports.

In addition, the Kahului Airport, Honolulu International Airport and the other public airports are under the control of the HDOT. This allows the funds generated at all Airports to be used at any State Airport and, therefore, as the total passenger count for the State does not change, the potential impact would be insignificant.

- C. Population increase resulting from internationalization
- The impacts of internationalization has been thoroughly discussed in Sections 3.5, 3.6 and 6.0, and Appendix E of the Draft EIS. Please refer to response for Comment DM-2.

- D. Local Vegetable and Dairy Industry

The economic impacts of the Proposed Project on the agricultural industries are discussed in Sections 3.5, 3.6, 6.0 and 8.2, and in Appendix E. Also please refer to Response DM-3 above on growth impacts. At this time, there is no indication that direct flights from the mainland would threaten local vegetable or dairy industry more than would current one stop flights which now serve Maui from the mainland. Direct flights from Mexico or the Philippines are considered speculative since the market or demand for such flights does not exist, nor is demand expected to exist within the proposed planning period. The inspection of

Health Care Facilities. The health care facilities on Maui are subject to insufficient funding, shortages of acute care beds and difficulties in hiring staff. The proposed airport improvements in and of themselves are not expected to affect or be affected by existing or planned health care services and facilities. The cost of increasing Maui Hospital to handle an airplane crash is not known, since it would involve a multitude of factors within the health care system of Maui.

Please refer to the response to item A above. Also, the cost of jet fuel is dependent largely in part of the world-wide cost of petroleum and the incidental cost of refining, shipping and storage. It is beyond the scope of this EIS to speculate on the future cost of petroleum and jet fuel.

G. Homerule

The Proposed Project is not expected to cause any loss of Maui home rule. The existing Airport and the Proposed Project is within the HDOR's authority as defined by Hawaii Revised Statutes. The construction of a longer runway and the internationalization of Kahului Airport will not change the present decision authority of the County of Maui, the State of Hawaii, or the United States of America. Maui's development is currently under the control of the County of Maui and the Proposed Project does not change that authority. It is not expected that the U.S. Government will surrender its regulatory authority to foreign governments.

The socio-economic effects of the Proposed Projects are discussed in Section 3.5 Socio-Economic Impacts and Appendix E, "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements". At this time, Hawaiian sovereignty is a concept under discussion within the Hawaiian community. Since the concept of Hawaiian sovereignty is still under development, the effect of Hawaiian sovereignty on it is unknown and is listed as an area of controversy in the EIS.

H. Local wholesale and retail trade

The retail and wholesale trade on Maui, as is the State of Hawaii, is undergoing a structural change. An example of this is the development of the Maui Triangle, which is discussed in Section 5.1.1, Triangle Square Factory Stores, Kmart and Costco and the Redevelopment of the Kahului Shopping Center. Retail and wholesale trade will continue to evolve within the State and on Maui with or without the Proposed Project. The establishment of a Duty Free store at Kahului Airport must be based on

international flights and passengers for agricultural pests is under the jurisdiction of the United States Department of Agriculture (USDA) as discussed in Section 8.2.

E. Safety issue

The issue of aviation safety is discussed in Section 3.22.9.1, Aviation Safety and Appendix N, Aviation Studies of the Draft EIS. While the airfield at Kahului Airport generally meets FAA standards and guidelines contained in the applicable FAA Advisory Circulars and Orders, portions of the airfield need to be brought into conformance with current FAA standards for existing aircraft operations. The proposed project will bring the airfield into current FAA standards for interisland and overseas aircraft using Kahului Airport. The longer runway will increase the margin of safety and is considered a beneficial impact of the Proposed Project. In addition, as stated in Section 2.3.2, the reduction of one-stop overseas flights to Honolulu International Airport, will reduce the likelihood of air-to-ground and ground-to-air mishaps.

F. Impacts on infrastructure

The forecast increase in aviation demands, including passengers, will occur with or without the Proposed Project. Please refer to Response DW-3 above for growth impacts. The effects of the Proposed Project on traffic are discussed in Section 3.22.8 Surface Transportation, Appendix M and Appendix P of the Draft EIS. The construction cost of the improved and new roads by the project are within the Proposed Project cost, Section 2.5 of the Draft EIS. Other costs of roads and highway not considered as part of the Proposed Project are not considered in this EIS, but will be considered in other environmental, planning and design documents.

The increased energy needs for electrical power are discussed in Section 3.18 Energy Analysis of the Draft EIS. The potential increased load at Kahului Airport is small compared to the overall electrical demand on Maui. HDOT, Airports Division, will keep Maui Electric Company (MECO) updated as the facilities are developed and more accurate electrical demands can be generated. Electrical demand outside of the Airport area is incorporated into the long term planning of MECO. The forecast increase in demand is considered insignificant and a great majority of the increased demand will occur with or without the Proposed Project.

The effect of the Proposed Project is discussed in Section 3.22.5 Health Care Facilities and Section 5.1.4.3 Regional Impacts -

FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic and international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the Alien Species Action Plan, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible, and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as

international travel to areas with high duty and upon economic factors which do not exist now. If additional international travelers come to Maui in the future and a duty free store becomes viable, a portion of its sales will be at the expense of the duty free stores at Honolulu International Airport. At this time, it is not possible to estimate the impact of a duty free store serving a minimum of three flights a day at the airport on the local community of Maui. Please refer to response for Comment DM-2 above on internationalization.

I. Specific Problems resulting from Internationalization

1. Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project and the ASAP Plan is included in Appendix Q of the Draft EIS. The Alien Species Action Plan Project was made up of at least 20 state, federal and private organizations, including the Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (COAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Park Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the

Professor Dick Mayer
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August 20, 1997

AIR-EN
97.1114

an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

2. Maui Police Department

The impact of direct flights on the Maui Police Department is addressed in Section 3.22.4.1 and has been judged to be insignificant since the increase of passengers will not outpace the County of Maui's ability to enlarge the Police Department and/or the State's ability to increase security personnel at the Airport. The impact on the Police Department due to internationalization is discussed in Section 6.5.2.4 and Appendix E of the Draft EIS.

J. Commercial Cargo

The growth impact on agriculture cargo is discussed in Sections 6.5.1.6 and 6.5.2.5. At this time, direct agriculture air cargo going to the mainland is limited due to the reduced loads of the overseas aircraft using Kahului. There are no all-cargo overseas aircraft serving Kahului Airport, nor is there any indication that such service would be available in the future. It is expected that the runway extension would allow more belly cargo space on the overseas aircraft available for agricultural product shipments. The need for overseas air cargo flights would be a decision by the domestic or international air carriers and would be based on many factors including the economic viability of that service.

K. Viability of the Existing Interisland carriers

Based upon the forecast of passengers and aircraft operations, in Appendix N of the Draft EIS, the number of interisland aircraft operations would not grow as fast if the runway was extended. The economic impacts are discussed in Sections 3.5, 3.6, and 4.2, and in Appendix E of the Draft EIS.

L. Alternatives

A reasonable range of alternatives for the Proposed Project were analyzed as required by NEPA and HEPA. One of the alternatives studied was the use of alternative methods of interisland travel. As stated in Section 2.0, one of the purposes of the Proposed Project is to allow for fully loaded, direct departures from Kahului Airport by overseas aircraft.

Professor Dick Mayer
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M. Best Island

We disagree with your comments on the impacts of the Proposed Project on Maui. However, your comments will be made available to the decision makers prior to a final decision on the Proposed Project. Maui will continue to be, with or without the Proposed Project, a beautiful island.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



MAUI LAND & PINEAPPLE COMPANY, INC.

April 30, 1996

Mr. David Welhouse
April 30, 1996
Page 2

Mr. David Welhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu International Airport District Office
Box 50244
Honolulu, Hawaii 96850-0001

Dear Mr. Welhouse:

I am writing to you to strenuously urge that the EIS for the Kahului runway extension be approved and that this project move ahead as soon as possible. I am extremely concerned that a vocal minority which opposes this project can seriously damage our community and endanger the well-being and health of Maui citizens and our economy. This should not be allowed to happen.

Of primary concern to me and my family is the safety of Kahului airport. If an airplane landing at Kahului Airport has a mechanical failure such as a flat tire which impairs its ability to stop quickly, we could have a disaster. I fly from this airport approximately once a week, my family flies approximately once a month, and it is a deadly serious matter to have an inferior and unsafe condition persist. This is an overriding concern.

Secondly, our agricultural industry and visitor industry, which are the main stay of our economy, vitally need a longer runway in order to remain viable and competitive. This is not an issue which is just convenient or nice. It is critical to the success of both industries that we have efficient, comfortable and state-of-the-art transportation facilities if we are to remain competitive and preserve the quality of our community as we know it.

A longer runway will mean quieter airplanes, fewer noisy airplanes and a greater altitude of overflight for the beachfront community. Why these facts are not universally understood and endorsed is incomprehensible to me. Our community including Paia and Sprecklesville will have less noise intrusion and this should be recognized as a desirable side effect from a longer runway.

P.O. Box 187, Kahului, Hawaii 96732-0187 • (808) 877-1351 • Fax (808) 871-0051

Lastly, I read with great interest the results of a Maui News poll of Maui citizens on the airport runway issue. It was readily apparent to me, and any other reader of the results of this poll, that the community supports a lengthening of the runway. I would urge that you take notice of and act according to the results of this poll which are quite distinctly opposite from the allegations of the vocal minority on this issue.

Should you have any questions for me or if I can support this project in any way, please let me know.

Sincerely,

Paul J. Meyer
Paul J. Meyer
Executive Vice President/Finance

/jmh

MAUI LAND & PINEAPPLE COMPANY, INC. 1000 S. WILSON AVENUE, SUITE 100, KAHULUI, HAWAII 96732-0187

DE HUIAHOE J. CALETANO
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5097

KAZU HAYASHIDA
DIRECTOR
AIRPORTS DIVISION
GILBERT CHAMBERLAIN
BRIAN K. MINAHI

MINISTRY OF
AIR-EN
97-946

August 20, 1997

Mr. Paul J. Meyer
Executive Vice President/Finance
Maui Land and Pineapple Company, Inc.
P. O. Box 187
Kahului, Hawaii 96732-0187

Dear Mr. Meyer:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your letter of April 30, 1996 in support of the proposed Kahului Airport Improvements. Please be assured that we are moving forward as fast as we can with the Proposed Project. Your letter and this response will be appended to the Final EIS for review by the decision makers.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Melhouse)

DEPARTMENT OF TRANSPORTATION
GOVERNMENT OF HAWAII



MAQUHAYASHIDA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
GLENN M. OKAMOTO
BRIAN K. MINAMI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

DEPT REFERENCE
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97-950

August 20, 1997

May 2, 1996

Mr. David J. Welhouse
FAA, Airports District Office
Post Office Box 50244
Honolulu, Hawai'i 96850-0001

Dear Mr. Welhouse:

Greetings and aloha.

We, here on Maui, are looking for a well house.

Contrary to the "environmental impact statement" one need only to look at their own environment.

These islands, like every thing, have limits.

Population, that is more than can be adequately taken care of, in any given area, is a serious problem.

With the "internationalizing" of the airport on Maui it will just very simply add more problems than the local government and economy could possibly cope with now or in the foreseeable future.

From this quarter, we whole heartedly say no to airport expansion. We are,

Sincerely,

Sam Miguel
Sam Miguel Ph.D.

Post Office Box 1071
Paia, Maui, Hawai'i 96779
Telephone/Fax 808-575-2350

CC: Governor Cayetano

Dr. Sam Miguel
P. O. Box 1071
Paia, Hawaii 96779

Dear Dr. Miguel:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 2, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT SM-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to

MAUI COUNTY HISTORICAL ASSOCIATION



MAUI COUNTY HISTORICAL ASSOCIATION

terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the proposed project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "mitigation measures")

COMMENT EN-2 - Socio-Economic Effects of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities

have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Dr. Sam Miguel
Page 4
August 20, 1997

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Wellhouse)



MAUI SOFTWARE

May 2 1996

Brian Ishii
Edward K. Noda & Assoc.
615 Piicoi St., Ste 300
Honolulu, HI 96814

Subject: DEIS and its proposals regarding lengthening the Kahului Maui airport runway

I support the "No-Action" alternative regarding runway lengthening and a parallel runway at Kahului airport. The negative impacts of expansion and internationalization are many. Tourists come to Maui because for many reasons, one major reason being Maui's "unspoiled environment." Yet internationalization will surely spoil the environment. Donald W. Reeser, Superintendent of Haleakala National Park, in a letter to the Maui News on April 22, 1996, states "Under the EIS proposal, direct international flights mean disaster for Maui's unique natural resources." In other words, internationalization will *turn away* tourists, exactly the opposite of what it's supposed to do. This is just one example of many why runway lengthening and a parallel runway at Kahului airport are bad ideas.

I own a high-tech software company called Maui Software that develops software (*not* a software store, but a developer of software). I and my employees need the type of environment Maui now offers for creative thinking—we do not want to work in another Honolulu or Los Angeles. I was under the impression the state of Hawai'i is trying to promote high-tech industries, especially software industries, yet lengthening the Kahului Maui airport runway will drive away those very high-tech companies that the state is trying to attract by turning Maui into another Honolulu. Please be advised that in this day and age, software companies need a creative environment. All of our work is transmitted to and from Maui via the Internet—it is no longer necessary to ship physical goods, only digital goods, and that can be done electronically. When the Kahului airport runway is lengthened, that's when I move my company, probably to another state.

Aloha and mahalo,



William E. Modesitt

Maui Software • 189 Auoli Dr. • Makawao, Maui, HI 96768-9313
Phone: 808-573-0011 • FAX: 808-572-2406
eMail: maui@aloha.net • Web page: <http://aloha.net/~maui>

DR. HUBERT J. CATTIAGO
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. William E. Modesitt
Maui Software
189 Auoli Drive
Makawao, Hawaii 96768-9313

Dear Mr. Modesitt:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 2, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT WEM-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in

KAHULUI AIRPORT
IMPROVEMENTS

DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

FOR YOUR REFERENCE
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Mr. William E. Modesitt
Page 2
August 20, 1997

time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation and the Federal Aviation Administration. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. (See attachment "international flights")

COMMENT WEX-2 - Purpose and Need for Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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F E L L O W S

BEKUANAH J. CALESTRAO
SAVING



HANUWAKAWAKA
MOKUAU
REPUBLIC OF HAWAII
KULIPIHI OMAHOA
BRIAN K. MINAMI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

REPLY TELEPHONE
AIR-EN
97-947

May 1, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

Aloha,
I am writing regarding the airport expansion project on Maui.

The EIS inadequately addresses the most serious issue raised by expanding Kahului Airport: the risk of introducing non-native species. It is therefore unacceptable. In fact, the FAA has already indicated its belief that airport expansion would pose no threat to endangered species. (Face reality!)

The EIS fails to establish inspection and quarantine procedures for the airport. If international flights start landing without such procedures, the chances of disaster striking are multiplied immeasurably. (Elementary deduction!)

The FAA and Hawaii Department of Transportation, joint authors of the EIS, have excluded the National Park Service from discussions. Very suspicious.

Please protect our islands by not endangering Hawaii's and especially Haleakala's fragile ecosystem.... and do your job by supplying the community with an EIS which considers the above mentioned urgent issues.

A Concerned Hawaii VOTER:

K Moore
Kimberly E. Moore
P.O. Box 1230
Haleiwa, HI 96712

cc: Owen Mityamoto
Department of Transportation, Airports

August 20, 1997

Ms. Kimberly E. Moore
P. O. Box 1230
Haleiwa, Hawaii 96712

Dear Ms. Moore:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 1, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comment, which are attached for reference.

COMMENT KEY-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), Department of Interior Fish and Wildlife Service (FWS), Department of Interior Fish and Wildlife Service (FWS), Department of Interior Fish and Wildlife Service (FWS). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

See Comment KEY-1

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Ms. Kimberly E. Moore
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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies.

Ms. Kimberly E. Moore
Page 3
August 20, 1997

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This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT KEM-2 - Quarantine and Inspection Procedures

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT KEM-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment

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Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

KAHUHAHUA
SECTION
1470 KAHUHAHUA
CULPIN OAKWOOD
BRIAN K. RIMAI



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

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DEPARTMENT OF TRANSPORTATION

PORTED
6/15/96

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OFFICE OF
QUALITY CONTROL

June 17, 1996

Office of Environmental Quality Control
State Department of Health
Central Pacific Plaza - Fourth Floor
220 South King Street
Honolulu HA 96813

Dear Sirs:

Let me add my support to those who deem the extension of the runway at Kahului Airport a threat to the human habitat of a small and relatively fragile island ecosystem. Over the past twenty-two years I have spent considerable time as a part-time resident and student of island culture and biology.

I would argue that the increase in volume of air traffic due to the expanded runway represents a larger rate of change than this island ecosystem can tolerate without undue stress on the infrastructure and human ecology. I would suggest that the state and county focus on infrastructure well in advance of expanding the air strip.

Sincerely,

Harold J. Morowitz
Director

Mr. Harold J. Morowitz
Director
Krasnow Institute for Advanced Study
Mail Stop 2A1
George Mason University
Fairfax, Virginia 22030-4444

Dear Mr. Morowitz:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
Stato Project No. AH1011-07

Thank you for your comment letter of June 17, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT HJM-1 - Impact of Proposed Project on Ecosystems

The potential effects of the Proposed Project on biotic communities is discussed in Section 3.11 of the Draft EIS. In brief, the Proposed Project will result in the loss of Cane Field/Ruderal Border, Koa Haole/Mixed Understory, and some Open Grassland vegetative zones. These vegetative zones are primarily habitat for introduced bird species. Similarly, the Proposed Project will affect feral mammals that inhabit the agricultural areas where the parallel runway will be constructed. The feral mammals are also introduced species.

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior and National Park Service (NPS), Department of Interior Fish and

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STATE DEPARTMENT OF HEALTH

Mr. Harold J. Morowitz
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Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the

Mr. Harold J. Morowitz
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Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will not directly impact the marine environment and there will be insignificant or no effects on water quality or runoff.

COMMENT HJH-2 - Purpose of Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

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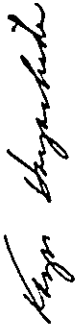
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The Proposed Project is also consistent with the Hawaii State Plan and Transportation Functional Plan, in that it will provide adequate air transportation facilities for cargo and passenger service consistent with planned growth and accommodate forecast growth in aviation activity and passenger levels.

The proposed Kahului Airport Improvements are as much a part of the overall infrastructure of Maui as are the roadway, water, electrical power and wastewater collection, treatment and disposal systems. The HDOT, Airports Division, continues to work with other State and County agencies to assure the residents of and visitors to Maui they have the services and facilities necessary to serve an ever growing population.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

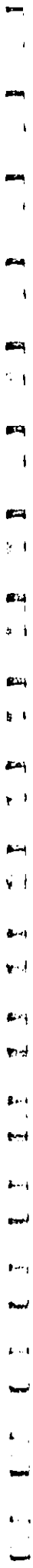
Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



STEVEN M. MOSER, M.D., INC.
1883 Maui Street
Wailuku, Maui, HI 96793

COMMENTS
KAHULUI AIRPORT IMPROVEMENTS
DRAFT ENVIRONMENTAL IMPACT STATEMENT

STEVEN M. MOSER, M.D., F.A.C.P.

MAY 8, 1996

I. INTRODUCTION

My concern, as a physician and part-time environmentalist here on Maui, is with the health and environmental aspects of the extension of the runway and internationalization of the airport. Therefore I was keenly interested in what these five volumes would say about these areas. Surely in all of this verbiage, I would find reasoned arguments satisfying my concerns in each of these areas.

What I found, instead, was the idea, repeatedly stated, that since there is no projected difference in the population growth whether we build the runway or not, this particular area, whether it is the hospital, the schools, or the police department, will not be adversely impacted.

Amazingly, in all of these pages, health care is covered in two pages, schools in one page, police and fire one and one-half pages, a mere gloss on the major impacts that we should anticipate from runway extension and eventual internationalization. Alien species introduction, an area of grave concern to all farmers and environmentalists, is barely addressed in the entire EIS. We are given, instead, a generic Alien Species Action Plan in Appendix C, Volume V. This section does not even analyze the impact of direct flights from foreign countries on our fragile ecosystem. It borders on criminal negligence to leave undiscussed this crucial area of potential environmental destruction.

The DEIS, despite its length and complexity, did not consult several key institutions and services on Maui. This is in keeping again with the premise that since there will be no additional growth, there is no need to consult with services that will suffer the burdens projected to occur during and after the extension of the runway.

Since I don't agree with the premise, I will repeat and add to several of the points I made in my Comments to the scoping meeting, as appear in the DEIS. In addition, I will address the immense cost of the project and the lucrative financial benefits accruing to certain land owners on Maui.

See Comment 2-1

See Comment 2-2

See Comment 2-3

See Comment 2-4

II. INACCURATE POPULATION PROJECTIONS

The underlying premise of the Kahului Airport Improvements Draft Environmental Impact Statement (DEIS) is that lengthening the runway will have no impact on the eventual growth of Maui. Using this premise, the entire DEIS finds no significant impact in each area of concern, including all infrastructure, resource, cultural, environmental and social impacts. Because of this premise, there is no in-depth analysis of impacts for either scenario ("no action" vs. 9600 ft.), and therefore it makes no sense for anyone to argue the fine points in each of these areas. In essence, five large volumes could have been condensed into a single sentence:

Since the runway lengthening will not significantly affect population growth on the island of Maui, there will be no adverse impacts on any area of concern.

I strongly disagree with the premise of the EIS. In my opinion, the population will inevitably be increased at a faster rate by building the longer runway for the following logical reasons:

- 1). Easier access to Maui with direct flights from the mainland and eventually the world will make it easier for more people to come here because the connections will be simpler. It will be easier to package group tours, and fares will probably go down.
- 2). Building the airport will attract a great influx of construction concerns, businesses, federal and state support services, whose employees and families will need housing, roads, services and so on.
- 3). More interisland flights, not fewer, can be expected as visitors come here to make Maui their base, and want to visit other islands during their vacation. This will bring a greater number of visitors from other islands as fares go down between the islands because of increased use and competition.
- 4). Wider exposure of the island to the world tourist market because of ease of accessibility will spur investment and growth, with increased marketing and speculative development.

Section 1.8.3 -- SASP Flawed Reasoning

It appears that instead of addressing these very obvious economic realities, the DEIS attempts a sleight-of-hand by reintroducing a logically flawed reasoning process that was first used in the Final Environmental Impact Statement of the state in 1992.

On page 1-22 of Section 1.8.3, the DEIS refers to its use of a "revised" SASP forecast for visitors to the Hawaiian Islands over the next 15 years. In the state's Final Environmental Impact Statement for 1992, to which the DEIS refers, the original SASP forecasts are said to "...represent 'unconstrained' demand, i.e. they assume that airport facilities necessary to accommodate the forecast level of activity will be provided." Section 2.4, p. 39. (Italics mine)

Further, on page 45 (Section 2.5) of the 1992 State Final EIS, it is stated:

The forecasts contained in the SASP assumed that the airport improvements recommended in the SASP report (which at Kahului Airport included an extension of the existing runway to 10,500 feet and the construction of a parallel runway by the year 2010) would be made. Since the improvements recommended in the preliminary draft Kahului Airport Master Plan Update Study are generally consistent with those envisioned in the SASP (i.e., and extension to Runway 2L-20R to 9600 feet and the construction of a 8,500 foot runway parallel to Runway 2L-20R), the SASP forecasts represent the level of activity anticipated if the master plan recommendations are implemented. (Italics mine)

The current DEIS uses the same flawed logic as is found in the state EIS's use of the SASP forecast - it assumes that there will be a 9600 foot runway in its predictions of growth, thereby disallowing the possibility of leaving the airport truly status quo by not lengthening the runway. Succinctly stated, the "no change" scenario is considered in the DEIS to include the 9600 foot runway extension, because the visitor numbers projected in the SASP reports (both original and revised) are made on the premise of runway extension. This magic trick of starting with the premise that 7000 feet equals 9600 or 10500 feet allows the drafters of the EIS to conclude that runway extension and internationalization will have no increased impacts, and this invalidates the whole EIS, as far as I am concerned.

The DEIS further confuses the issue by classifying certain airport improvements used in the SASP as "demand-related" and others as "non-demand related":

It should be noted that this change in forecast does not affect non-demand-related facilities of the Proposed Project. These facilities are planned to correct existing deficiencies at the Airport These non-demand-related

projects are scheduled to be completed in Phase 1 of the Proposed Project and include: (i) the strengthening and extending Runway 2-20, and associated taxiways, (ii) new ground support equipment maintenance facility, (iii) installation of new fuel storage and loading facilities... (Italics mine) Section 1.8.3, p. 1-23.

There is a striking lapse in logic in this statement that demonstrates the circularity of the argument supporting the premise of "no difference in growth": the current pressure of population growth demands that we build a longer runway to accommodate more flights and more passengers, therefore we can classify this "improvement" as a "non-demand-related" improvement. In other words, since more people and flights are coming independent of whether there is a longer runway, the longer runway is redefined as a "non-demand-related" improvement.

This argument ignores the obvious objection that if population increase is pushing "demand-related" improvements, then how can the runway lengthening be considered "non-demand-related" when it is increased demand that makes it necessary?

Section 2.3.2

In addition, there is an underlying supposition that a 9600 foot runway must be part of any Master Plan for the airports, whether one calls it "demand-related" or "non-demand-related". The circularity of this argument is evident in Section 2.3.2, where it is stated, "The proposed improvements are consistent with planned growth throughout the state, and will accommodate existing and forecast aviation demands." If growth is "planned", and the extension of the runway is "consistent" with this planning, then extension of the runway can be considered a part of the planning for growth. That is, a necessary factor for that growth, contributing to, and even spurring it.

However, The EIS admits that the current runway offers an impediment to outgoing traffic (section 2.3.2, p. 2-21), because of weight considerations.

...the existing runway is not long enough and does not have adequate pavement strength to allow the existing flights from Kahului to the West Coast and other mainland airline hubs to depart with a full load of passengers, cargo and fuel. At present, these carriers and other charter flights can fly to the West Coast with partial passenger loads, only. (Italics mine)

The most serious flaw in the DEIS is that it does not pursue the logical corollary, that this limitation might prove to be a barrier to growth in the future, since it would discourage some tourists, some airlines and some businesses from flying into or out of Kahului Airport. This lapse is due to the inherent bias of the EIS favoring growth, such that the mere consideration that such an impediment to growth might by some be considered desirable is not even entertained. It is my feeling that the restrictions imposed by this weight allowance are an acceptable price to pay in order to preserve the continued magnificence of this island.

Community Resources Inc. Report

Another source of support for the contention that the premise of "same growth under any scenario" can be found in the Community Resources, Inc. Socio-Economic Impact Assessment in Appendix E of the Volume III which clearly finds about a 20% increase in 2010 visitor arrivals and average visitor census when it compares "constrained vs unconstrained no-action futures" in its sensitivity analysis (p. 7-31). Twenty percent is an enormous difference in terms of numbers of people on this island at any given time. This report also cautions over and over that all predictions are subject to great uncertainty because there are so many variables.

A true "no change" scenario is just that: no change from the status quo, i.e., current runway length, weight restrictions and airplane restrictions. Improvements that increase safety of current flights should be considered. But the status quo need not logically accommodate larger planes, heavier planes and more passengers, if that is what we want as an island state which wishes to preserve itself. We should not allow ourselves to be deluded into accepting what the DOT feels our future should be (based on flawed and illogical projections) with what we, as the residents of an island with limited resources and tolerance for change, know we need.

III. ISSUES NOT ADEQUATELY ADDRESSED IN THE ENVIRONMENTAL IMPACT STATEMENT

(Note: almost all of the concerns that I mentioned in the scoping meeting comments were left unanswered in the generic letter of reply from the Airports Division of the DOT. Therefore, I am repeating some of my major concerns, as well as adding others that have come up in the interim.)

A. Immediate and Ongoing Effects of Project Construction on Local Population

The EIS is missing a detailed discussion of traffic delays that we can expect due to 10 or more years of the several phases of highway and airport

See Comment 27-5

construction. Hana Highway is the only main artery from East Maui and upcountry, and construction along it will almost certainly have major impacts on timely access of commuters and tourists, not to speak of emergency vehicles. No analysis of lost time, wages, and the effects on productivity and safety during the long construction phase is given.

Actual scenarios of delays for each of the projects, including clover leaf construction at Hana Highway and Dairy Road and other intersection changes, the runway aprons, the realignment of Hana Highway, and so on, are not addressed in the DEIS. No alternatives are given for how such costly and burdensome delays can be avoided. Recent experience has shown that even small projects, nothing of the magnitude anticipated for this 15 year project (at least), can result in significant delays in traffic on our already overburdened highway system.

It is doubtful whether the county has the resources to manage traffic effectively under the current conditions of manpower shortage, increasing need, and budget shortfalls. Ideally, an entirely new highway should be built to reroute traffic past the areas of construction so that residents and tourists alike will not suffer the massive inconvenience and potential health and safety effects of this project. Such a possibility is not addressed in the DEIS.

B. Health and Medical Concerns

1. Medical Facilities -- Maui Memorial Hospital

The DEIS does not consult the State Department of Health in its list of consultants. This constitutes a major oversight, since the impact of runway lengthening and internationalization will be felt in the health sector to a greater extent than in other areas. The state is responsible for the only major hospital, as well as other clinics which are sole source service for Hana and Lanai, as well as Kula Hospital, which is one of two nursing homes on Maui.

Since the scoping meeting a year ago, no change has occurred at Maui Memorial Hospital (MMH). We still have inadequate beds for our population, relying on approximately 1.2 beds per 1000 persons, when the national standard is about 1.8 to 2.5 beds per 1000. Our hospital is always 90 to 120 percent occupancy, and we have experienced recent episodes of inability to provide bedspace for patients needing admission to MMH. Projections for future growth at our hospital have not changed: we will grow slowly due to budgetary constraints in the state, since MMH is and will remain (in spite of new governance legislation) in the state hospital system.

MMH has no burn beds, inadequate ICU beds, a small number of trauma beds in the ER, no state-of-the-art isolation rooms, small PT and OT

See Comment 27-5

See Comment 27-5

departments, and many other deficiencies noted in numerous audits and reviews that have been done over the last few years. The laboratory is not capable of diagnosing tropical diseases. Any increase in visitors and any increase in international visitors would increase the burden on these facilities and services.

2. County Medical Infrastructure.

The west side (Lahaina) is lacking medical facilities and personnel in the areas of internal medicine, OB-GYN, surgery, psychiatry, and pediatrics. Anything more than routine office care must be referred to the Central Maui area, in particular MMH and the specialists located in this area. The highway connecting the west side and central Maui is two lanes and often quite crowded, with frequent accidents causing long delays. Likewise, upcountry Maui and the Kihel - Wailea districts of the island are underserved. A helicopter ambulance service has remedied this problem to some extent, but there is serious question as to whether this company will be able to stay in business here much longer, due to high cost of operations. Increased growth in the west Maui area will only add to the problems now being experienced.

3. Increased Accidents.

Maui County, as of today (May 23), has already surpassed the number of traffic deaths that we had last year. MMH has admitted many more accident survivors in the last year than in previous years. These patients need extensive commitment of resources, time and manpower. With airport expansion, the inherent delays for commuters and tourists alike, the glut of rental cars with inexperienced (to Maui) drivers, the confusion of detours, frequent changes, etc. will only increase the numbers of fatal and non-fatal accidents on our already inadequate road system. The frustration in traffic now is almost palpable, and the aggressiveness of many drivers has been noted by all.

There is no public transportation on Maui, and none is anticipated. Bikeways are totally inadequate to the needs here, and there have been several fatal accidents involving bicyclists here. Foreigners from countries where bicycling is popular will be able to come here more easily if internationalization occurs, thereby increasing their risk. The DEIS does not address any of these concerns.

There have also been an increase in the numbers of accidental drownings, wilderness accidents, and other activity related accidents due to the increased level of outdoor activities that involve unpredictable natural circumstances. Increased visitors, especially the sedentary and elderly, who might be expected to come here if the travelling was made easier by a more accessible runway, would add to this form of risk. The DEIS does not address these areas.

See Comment 5-7

4. Imported Diseases.

My comments regarding this crucial area were entirely ignored in the DEIS. The impact of international air travel is currently a growing area concern in the international infectious disease community (see Appendix). It is certain that direct international flights will increase the burden of exotic, resistant, and tropical diseases (i.e. tuberculosis, malaria, AIDS, cholera, rabies, gonorrhea, and so on) which we are not prepared to diagnose or treat on Maui. This MUST be addressed in any reasonable discussion of environmental impacts of runway extension and internationalization of the airport. I register one of my strongest objections to this lapse.

5. Pollution

The DEIS does not look at the actual projections of near term effects of pollution related to construction--ie, sitting in traffic for prolonged periods of time breathing carbon monoxide at the high levels projected in the DEIS. What effect will this have on patients with lung and heart diseases? It is not enough to say that there will be higher levels of this and other pollutants: what is needed, and not supplied, is an accurate analysis of the true health effects that can be anticipated to occur in this population, which, due to its general poor health, can be considered to be more highly susceptible. (Mauians have a high incidence of asthma, coronary disease, and hypertension).

6. Effects of Overcrowding

My comments in the scoping meeting were ignored or inadequately addressed in the DEIS.

C. Environmental Concerns

Nothing has changed my mind regarding potential environmental effects since I wrote my comments to the scoping meeting. Please refer back to that testimony. None of these concerns was addressed in the DEIS. I am most appalled, as are many others, by the complete absence of any discussion of imported pests that could devastate our ecology and economy if released into our environment. How can this lengthy document equate the current situation of no direct flights from the Far East or other tropical countries, where these alien species come from, with the certain future of direct flights from these areas? This is a travesty, and must be rectified. Likewise, the impact of exported pests, such as fruit flies and worms, that could potentially devastate other agricultural economies was not addressed. Potential for recipient countries blacklisting or boycotting Maui as a destination, and the potential crippling effect this might have on our economy is not addressed

See Comment 5-5

We can be certain, that in this state, with its enormous and continuing budget shortfalls, and its lack of concern for the alien species that are already here, very little will be provided *de facto* to enhance inspection capacity. This has never been a high priority for the Department of Transportation or the Hawaii Visitors Bureau, as demonstrated by their unwillingness to take more stringent measures than now exist to prevent introduction of alien species. Others have addressed this concern in more detail and with more expertise. In particular, the National Park Service, which, unbelievably, was not consulted by the authors of the DEIS despite the fact the Haleakala National Park and its environs are an International Biosphere site and is located only 15 miles from the airport.

D. Air Traffic Accidents

As I stated in my comments on the scoping meeting, I would anticipate that due to increased air traffic both from international and mainland connections, as well as from an increase in interisland flights (*supra vide*), there is a greater potential for air accidents. Maui differs from most other airports in that the Central Valley is relatively narrow, spaced between two large mountains (Haleakala at 10,000 ft and West Maui at 6,000 ft.), and there is a strong wind corridor that funnels through it. The thought of two parallel runways taking simultaneous traffic is very worrisome. I myself have witnessed a DC-10 gearup landing approach aborted at the last moment in June of 1995, although this has been denied by both American Airlines and the FAA (see appendix). The close maneuvering space that this airport entails is magnified by the proximity of increased numbers of large airplanes landing simultaneously on parallel runways. If general aviation is thrown into the mix, the recipe for disaster is increased. The DOT (and hence the DEIS) does not seriously address the relocation of general aviation away from the main airport.

The safety argument that proponents and the the DEIS hold forth is specious, also, in that:

- 1) the current airport has an excellent safety record, with no major accidents on record, and
- 2) lengthening the runway would allow larger planes to land, and these larger planes would again tax the limits of safety, just as the smaller planes are doing in the current situation.

The concern that Honolulu Airport will be overburdened without the Kahului runway extension ignores the current underutilization of the reef runway, which was built for projected increased traffic for the foreseeable future.

DMAT, the emergency response team located at MMH, is capable of handling small disasters, but is not capable of handling a major air disaster. Loose plans to fly in help form Honolulu are just that, and have never been tested. As noted

above, MMH is incapable of handling even a small accident involving more than a few serious injuries. This fact does not justify bringing in larger planes holding more passengers, as envisioned in the runway extension/internationalization scenario, but rather it justifies rectifying the current situation before any anticipated expansion.

E. Cost Factors.

The cost of this project is enormous, and the State of Hawaii contributes substantial funding to the project. The use of \$300 Million of public money for such a controversial project, without adequate public input in the form of consultants involved in the public good, is deplorable. The DEIS fails to determine alternative uses for these public monies in areas that are desperately crying out for more funding. Where is this vital discussion?

It is a disturbing and obvious conflict of interest that A&B Corporation will make over \$11 Million from the small parcels of land that it is "selling" for the airport expansion. The conflict of interest arises from the fact that this privately held company, which stands to make an enormous profit from the initial sale of this scrub land, and later from the commercial and residential infrastructural growth that it anticipates from internationalization of the airport, has been one of the "consultants" in the DEIS, at a time when important concerns such as the National Park Service and the Hawaii Department of Health were ignored. A&B's presence, and these (and other) important organizations absence as consultants on the EIS, raises serious concerns as to the overall bias and validity of the whole EIS process.

IV. CONCLUSION

There are many other concerns that I have included in my written comments in the Scoping Meeting, but in conclusion, I must express my profound distrust of this EIS and the biased spirit in which it was written, with its carefully plotted and hidden false premises and resulting unbelievable conclusions. It almost cynically disallows any discussion of the true impacts that this project will have. This EIS must be withdrawn, and redone such that it fairly addresses the major concerns that this community has.

Alan Mee

See Comment 5-5

See Comment 5-5



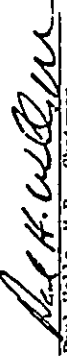
STEVEN M. WOSER, M.D., INC.
1883 IMA STREET
WAILUKU, HAWAII, HI 96793

LANSCAPE CARE
DEPARTMENT

MAUI MEMORIAL HOSPITAL
271 MAHALELE STREET
WAILUKU, HAWAII, HI 96793

Bert Kobayashi
Page 2
January 25, 1996

Our staff leadership is available at any time to discuss this matter with you. Attached is the Department of Medicine action and previous correspondence to Division regarding this problem.


Paul Wells, M.D., Chairman
Clinical Performance Improvement Committee
Department of Medicine QI/QI Committee

PM/Hil:js

Attach.

- c: Alan Lee, MHI Administrator
- Camilo Rosales, M.D., MHI Chief of Staff
- Beverly Perreira, R.N., MHI QI Coordinator
- Carolyn Joyo, MHI Risk Manager
- Rene McWade, Division Risk Manager

DATE: January 25, 1996

TO: Bert Kobayashi, Deputy Director
Community Hospitals Division

Clifford Chang, M.D., Medical Director
Community Hospitals Division

FROM: Paul Wells, M.D., Chairman
Clinical Performance Improvement Committee
MHI Department of Medicine

RE: BED SHORTAGE

On January 22nd the hospital was again severely over capacity with 204 inpatients (temporary certification 180 beds). Two cases were of great concern due to the complete unavailability of even general medical beds. A pacemaker case with low battery indication needing replacement was sent home due to unavailability of post-operative beds. A second case involved a patient admitted to Molokini Psychiatric Unit with multiple seizures requiring general bed or PCU bed for appropriate therapy. No beds were available in ICU/PCU or the general medical floors. At 8:00 a.m. an urgent request was made to immediately transfer the patient back to the Emergency Room for holding until an appropriate bed was available. Unfortunately the Emergency Room was completely full holding 7 acute admissions which were awaiting a bed within the hospital. No bed was available for 8 hours and the patient had 12 seizures. The Molokini staff is not capable of managing a patient of this acuity. Severely suboptimal patient care situations resulted in both of the cases.

Your immediate attention and urgent action remains needed during this high census period to rectify this ongoing patient care crisis at our facility. The Department of Medicine today unanimously voted that appropriated funds for Maui North be urgently released and highest priority be given to this situation.



Table G2
Maui County Acute Care Hospital Inpatient Utilization Patterns
by Hospital by Quarter for 1991-1993 (Continued)

MAUI MEMORIAL HOSPITAL 1991									
BED CATEGORY	MEDICAL/ SURGICAL	CRITICAL CARE	OBSTET- RICAL	PEDIATRIC	PSYCHI- ATRIC	TOTAL			
NUMBER OF BEDS	104	8	18	5	10	145			
QUARTER 4									
INPATIENT DAYS	9885	624	679	246	599	12,033.00			
ADMISSIONS	1398	184	437	95	54	2,168.00			
AVERAGE LENGTH OF STAY	7.07	3.39	1.55	2.59	11.09	5.55			
OCCUPANCY %	103.32	84.75	41.00	53.40	65.10	90.20			
AVERAGE DAILY CENSUS	107.45	6.78	7.38	2.67	6.51	130.79			
YEAR TOTAL									
INPATIENT DAYS	40,305.00	2,057.00	2,625.00	957.00	2,144.00	48,089.00			
ADMISSIONS	5,515.00	620.00	1,615.00	367.00	206.00	8,323.00			
AVERAGE LENGTH OF STAY	7.31	3.32	1.63	2.61	10.41	5.78			
OCCUPANCY %	106.18	70.50	39.94	52.40	58.70	90.86			
AVERAGE DAILY CENSUS	110.43	5.64	7.19	2.62	5.87	131.75			
KULA HOSPITAL, LANA'I COMMUNITY HOSPITAL AND MOLOKA'I GENERAL HOSPITAL 1991									
HOSPITAL/ BED CATEGORY	KULA MED./ SURG.	LANA'I MED./ SURG.	CRIT. CARE	OB- STETRIC	PSYCHI- ATRIC	LANA'I TOTAL	MOLOKA'I MED./ SURG.	OB- STETRIC	MOLOKA'I TOTAL

SHPDA TRI ISLE HEALTH CARE NEEDS ASSESSMENT 1993-94

G-12

Table 18. Occupancy Rates by County, 1982 - 1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
LONG TERM CARE											
O'ahu	96.0	95.4	97.3	97.2	90.5	93.7	91.4	95.0	92.9	91.8	94.6
Hawai'i	82.9	94.6	95.2	95.3	93.8	96.7	92.3	95.1	96.1	98.8	104.3
Kaua'i	99.8	94.5	96.3	91.1	83.0	92.1	86.9	94.0	90.2	94.9	96.1
Tri-Isle	94.9	96.8	92.6	97.0	97.3	95.6	95.3	82.9	92.5	95.6	95.7
Maui	95.4	97.5	95.0	97.0	97.6	95.7	97.0	83.1	93.2	96.8	97.7
Moloka'i	92.5	97.6	55.8	96.8	89.3	90.1	70.1	77.1	87.4	87.7	77.1
Lana'i	77.5	66.6	95.1	84.9	---	100.0	---	84.1	77.2	65.0	62.7
TOTAL ACUTE CARE											
O'ahu	79.1	76.5	70.8	67.7	67.3	74.4	75.0	74.9	72.0	70.0	71.2
Hawai'i	49.5	48.2	48.3	48.3	53.8	60.7	67.8	65.8	70.2	71.2	57.9
Kaua'i	57.4	49.5	43.8	50.0	44.4	51.5	53.4	63.5	52.0	47.5	55.4
Tri-Isle	59.1	62.3	58.2	57.8	61.5	64.6	69.8	73.3	76.3	82.9	81.0
Maui	65.5	67.3	60.4	62.6	65.4	70.1	72.6	80.5	82.2	90.0	88.2
Moloka'i	19.3	34.0	41.4	17.3	25.0	15.8	18.4	10.6	13.7	14.6	7.5
Lana'i	5.0	13.3	12.7	12.9	---	12.9	---	16.7	11.1	8.3	2.7
MEDICAL-SURGICAL											
O'ahu	83.0	77.2	69.8	68.2	68.8	73.3	73.1	74.8	69.5	69.1	70.9
Hawai'i	63.9	60.8	62.4	62.3	65.1	74.6	80.3	80.2	87.9	89.1	65.1
Kaua'i	64.1	54.2	45.8	54.5	47.6	56.1	55.2	68.8	54.9	50.7	63.4
Tri-Isle	76.8	81.8	65.2	65.0	67.7	72.4	78.9	85.5	82.3	98.1	94.6
Maui	82.5	86.0	66.1	70.5	72.3	77.7	80.7	92.1	93.4	106.2	101.2
Moloka'i	37.5	55.0	57.4	21.5	25.0	17.7	30.7	13.0	19.9	22.7	10.3
Lana'i	10.0	23.3	22.5	22.2	---	24.1	---	31.5	16.1	12.1	4.1

--- = Category not applicable. --- = Data not available. Excludes Tripler.
Source: SHPDA, April, 1993 - Table 18a.WK1

Table G2
Maui County Acute Care Hospital Inpatient Utilization Patterns
by Hospital by Quarter for 1991-1993 (Continued)

MAUI MEMORIAL HOSPITAL 1993									
BED CATEGORY	MEDICAL/ SURGICAL	CRITICAL CARE	OBSTET- HICAL	PEDIATRIC	PSYCHI- ATRIC	TOTAL			
NUMBER OF BEDS	104	8	18	5	10	145			
QUARTER 4									
INPATIENT DAYS	10573	647	677	205	759	12,861.00			
ADMISSIONS	1411	212	434	88	82	2,227.00			
AVERAGE LENGTH OF STAY	7.49	3.05	1.56	2.33	9.26	5.78			
OCCUPANCY %	110.50	87.88	40.89	44.60	82.50	96.41			
AVERAGE DAILY CENSUS	114.92	7.03	7.36	2.23	8.25	139.79			
YEAR TOTAL									
INPATIENT DAYS	43,215.00	2,299.00	2,447.00	850.00	3,075.00	51,916.00			
ADMISSIONS	5,565.00	788.00	1,628.00	340.00	278.00	8,600.00			
AVERAGE LENGTH OF STAY	7.77	2.92	1.50	2.50	11.08	6.04			
OCCUPANCY %	113.92	78.75	37.22	46.60	84.20	98.10			
AVERAGE DAILY CENSUS	118.48	6.30	6.70	2.33	8.42	142.24			
KULA HOSPITAL, LANAI COMMUNITY HOSPITAL AND MOLOKA'I GENERAL HOSPITAL 1993									
HOSPITAL/ BED CATEGORY	KULA MED./ SURG.	LANAI MED./ SURG.	CRIT. CARE	OB- STETRIC	PSYCHI- ATRIC	LANAI TOTAL	MOLOKA'I MED./ SURG.	OB- STETRIC	MOLOKA'I TOTAL

MAUI MEMORIAL HOSPITAL
SUMMARY OF ADMISSION BY MONTH
FY 1994-95 - 1995-1996

MONTH	Adult/Pediatric			Newborn			Combined Admissions		Total Change
	1994-95	1995-96	% Change	1994-95	1995-96	% Change	1994-95	1995-96	
July	693	725	+ 4.62%	130	142	+ 9.23%	823	867	+ 5.35%
August	748	688	- 8.02%	139	144	+ 3.60%	887	832	- 6.20%
September	665	708	+ 6.47%	133	153	+ 15.04%	798	851	+ 7.89%
October	687	703	+ 2.33%	135	144	+ 6.67%	822	847	+ 3.04%
November	646	745	+ 15.33%	122	139	+ 13.93%	768	884	+ 15.10%
December	657	738	+ 12.33%	114	138	+ 21.05%	771	876	+ 13.62%
6-Mo Subtotal	4,096	4,307	+ 5.17%	773	860	+ 11.25%	4,869	5,167	+ 6.12%
January	766			139			905		
February	708			119			827		
March	777			141			918		
9-Mo Subtotal	6,347			1,172			7,519		
April	701			132			833		
May	760			134			894		
June	687			151			838		
12-Mo Total	8,495			1,589			10,084		

Budgeted
Activity Level

Projected Activity
Over (Under)
Budgeted Level

(Over (Under)

Maui Memorial Hospital
Selected Operating Statistics
FYs 1994, 1995, 1996

Month	Adult/Pediatric Admissions			Change from Prev. Year
	1993 - 94	1994 - 95	1995 - 96	
July	728	693	725	+ 4.6 %
August	685	748	608	- 8.0 %
September	681	665	708	+ 6.5 %
1st Quarter Total	2,094	2,106	2,121	+ 0.7 %
Fiscal Year	8,474	8,495	---	---

Newborn Admissions (Births)

Month	Newborn Admissions (Births)			Change from Prev. Year
	1993 - 94	1994 - 95	1995 - 96	
July	128	130	142	+ 9.2 %
August	154	139	144	+ 3.6 %
September	155	133	153	+ 15.0 %
1st Quarter Total	437	402	439	+ 9.2 %
Fiscal Year	1,623	1,589	---	---

Adult/Ped Patient Days

Month	Adult/Ped Patient Days			Change from Prev. Year
	1993 - 94	1994 - 95	1995 - 96	
July	4,352	4,347	4,565	+ 5.0 %
August	4,160	4,331	4,524	+ 4.6 %
September	4,138	4,409	4,737	+ 7.4 %
1st Quarter Total	12,650	13,087	13,826	+ 5.6 %
Fiscal Year	52,801	53,710	---	---

Average No. of Maternity Patients Per Day for August, 1995: 42.6

Average No. of Maternity Patients Per Day for Sept., 1995: 41.1

MAUI MEMORIAL HOSPITAL
SUMMARY AND COMPARISON OF PATIENT DAY ACTIVITY
FY'S 1993-94, 1994-95 and FYTD 1995-96

Month	Adult/Pediatric Days				Newborn Days			
	1993-94	1994-95	Difference	%	1993-94	1994-95	Difference	%
July	4,352	4,347	- 5	- 0.11%	4,565	4,524	- 41	- 0.9%
August	4,160	4,331	+ 171	+ 4.11%	4,524	4,737	+ 213	+ 4.6%
Sept	4,138	4,409	+ 271	+ 6.55%	4,737	4,795	+ 58	+ 1.2%
Oct	4,321	4,481	+ 160	+ 3.70%	4,795	4,820	+ 25	+ 0.5%
Nov	4,363	4,139	- 224	- 5.13%	4,620	4,765	+ 145	+ 3.1%
Dec	4,177	4,249	+ 72	+ 1.72%	4,765	4,765	0	0%
6 mo. Subtotal	25,511	25,956	+ 445	+ 1.74%	28,006	28,006	0	0%
Jan	4,845	5,023	+ 178	+ 3.67%	2,695	2,695	0	0%
Feb	4,342	4,724	+ 382	+ 8.80%	2,300	2,300	0	0%
Mar	4,455	4,916	+ 461	+ 10.35%	2,284	2,284	0	0%
9 mo. Subtotal	39,153	40,619	+ 1,466	+ 3.74%	11,669	11,669	0	0%
April	4,033	4,466	+ 433	+ 10.74%	2,471	2,471	0	0%
May	4,075	4,556	+ 481	+ 11.80%	2,450	2,450	0	0%
June	4,540	4,069	- 471	- 10.37%	2,481	2,481	0	0%
12 mo. Subtotal Budgeted	51,801	53,710	+ 1,909	+ 3.69%	3,146	3,146	0	0%

#1 in TB

continued from page 1

Table: INCIDENCE OF TUBERCULOSIS BY COUNTY:

COUNTY	NO. OF CASES	RATE PER 100,000 POPULATION
Honolulu	199	23.0
Maui	29	26.6
Hawaii	13	11.5
Kauai	1	7.2
TOTAL	242	20.9

• Perform effective contact investigations, which include identifying persons who have been in contact with a person who has infectious TB; screening these contacts to determine if they have TB infection and/or disease; and provide appropriate and complete therapy when indicated.

• Screen persons at high risk for the development of TB disease, which consists of identifying those infected with TB and providing preventive therapy when indicated.

Oahu: Doris Mumbidge, R.N., TB Nurse Consultant
Judith Ramseyer, M.D., Acting Chief, TB Control Branch
Tel: 832-3731

Hawaii: June Kumano, R.N., District Health Service Administrator,
Tel: 933-4325

Maui: Lawrence Hunt, M.D., District Health Officer
Tel: 243-5293

Kauai: Ronald Meier, M.D., District Health Officer
Tel: 241-3495

Submitted by Bill Rosenberger, Public Health Advisor, Tuberculosis/Hansen's Disease Control Branch.

• Contact investigation services including examination, treatment, and follow-up.
The following individuals may be contacted to arrange for TB services or answer questions relating to those services offered for tuberculosis.

In addition to complete TB diagnostic and clinical services offered to the public, the following services are available to private physicians throughout the state:

- Medical and clinical consultation
- Laboratory services for the identification of TB and drug susceptibility status.
- Provision of drugs for the treatment of TB disease and infection.
- Provision of directly observed therapy (DOT).

Rubella Project

continued from page 2

ed at 10, 16, and 20 years after initial seroconversion. These surveys showed rubella antibody seroprevalence rates of 91.0 percent in 1979, 92.3 percent in 1985, and 92.1 percent in 1990 respectively, at a screening level of 10 IU/ml.^{1,2} These findings suggest that vaccine-induced rubella antibodies are detectable in almost all persons up to 20 years after immunization.

Since 1979 the only rubella vaccine administered in the United States is RA-27/3. This vaccine is more immunogenic than the other vaccines used previ-

ously, and results from the Hawaii Rubella Project are a good indicator for predicting the long-term persistence of antibodies induced by RA27/3 rubella vaccine.

Currently, the Hawaii Rubella Project is conducting a follow-up survey of individuals vaccinated against rubella 25 years ago. The mean age of the group is now 34 years. It is anticipated that research efforts to elucidate the duration of vaccine-induced immunity to rubella will continue with this group until they are no longer of child-bearing age.

REFERENCES:

¹ Herman KL, Halstead SB, Brandling-

Communicable Disease Report
 Hawaii's Tuberculosis Situation
 November/December 1995

November/December 1995

Hawaii Ranks #1 in TB

The Centers for Disease Control and Prevention (CDC) reported that there were 24,361 new TB cases reported during 1994, a 3.7 percent decrease from 1993's 25,287 new cases. The 1994 decline is the second in a row following an 8.7% decrease from 1992 to 1993. This begins to reverse the 20 percent increase in cases that occurred from 1985 through 1992.

The State of Hawaii experienced similar declines in TB during the same period. However during the past decade, the state has reported on an annual basis, a significantly higher case rate for TB than the nation as a whole. During 1994, 247 new cases were reported, a 1.6 percent decrease from the 251 cases in 1993 and 9.5 percent below 1992's 273 cases. The 247 cases reported in 1994 represents a case rate of 20.9 cases per 100,000 population. The national TB case rate during 1994 was 9.4/100,000 population.

Despite these recent declines, Hawaii ranked number one in the nation in TB case rates with 20.9 cases/100,000 population in 1994, followed by New York and California with TB case rates of 20.0 and 15.5/100,000 population respectively.

- the dissemination of TB with the HIV epidemic
- immigration from countries where TB is common
- the transition of TB in congregate settings, such as homeless shelters, correctional facilities, and health care facilities
- the dismantling and subsequent deterioration of TB prevention and control programs where TB was no longer seen to be a threat

continued on page 6

During 1994, 111 TB cases were reported in the City of Honolulu which represents a case rate of 29.4/100,000 population (See Table). These figures represent a slight decrease from the 177 cases reported in 1993 with a case rate of 31/100,000 population.

The TB case rate in Hawaii is greatly affected by immigration of persons from less developed countries in the Asia/Pacific region where the prevalence of the disease is high. Hawaii reports the highest percentage of foreign-born TB cases of any state in the nation. In 1994, approximately 80 percent of Hawaii's TB cases were in foreign born persons. Persons born in the Philippines represented 52 percent of the total TB cases reported and 66 percent of the foreign-born cases.

There were 247 new cases reported in 1994. The City and County of Honolulu reported the highest number of cases, while Maui county had the highest case rate (See Table). Pulmonary TB comprised 87% of cases while 18% had extrapulmonary disease. Males accounted for 64% of cases, while 36% of cases were female. Incidence increased by age, with only 8% of cases under 20 years of age, while those 65 and older accounted for 33% of the cases.

1994 HAWAII SUMMARY

Despite these recent declines, Hawaii ranked number one in the nation in TB case rates with 20.9 cases/100,000 population in 1994, followed by New York and California with TB case rates of 20.0 and 15.5/100,000 population respectively.

Rabies Surveillance: A Five Year Review

SURVEILLANCE REVIEW

Between 1990 and 1994, the Epidemiology Branch investigated 67 incidents of possible rabies exposure. The number of investigations ranged from 11 in 1990 to 15 in 1994. The number of people involved ranged from one to 46 per incident, for a total of 128 individuals. Age of those investigated ranged from 2 to 76, with a median of 40 years. Males accounted for 67%, while females comprised 33%.

By place of exposure, 24 investigations were conducted for possible exposure in Hawaii, 15 for incidents occurring in the Philippines, seven on the U.S. mainland and in Indonesia, three in Thailand and one each from 11 other countries.

By animal species, 41 of the investigations involved dogs, 9 involved cats, 7 monkeys, 3 bats, 2 hamsters, and one each involving a mongoose, rabbit, raccoon, squirrel and elephant (See Figure).

A total of 14 persons (51% of incidents) received rabies post-exposure prophylaxis. All but two of these individuals were possibly exposed abroad. Those involved in the possible local exposures requested rabies prophylaxis, even though circumstances did not suggest a possible rabies exposure had occurred. One individual bitten by a monkey in Brazil declined post-exposure prophylaxis in spite of recommendations made by the Department of Health (DOH) and the attending physician.

Difficulty was encountered in dealing with foreign exposures when patients were started on prophylaxis in the country of exposure. None of the regimens administered correlated with the ACIP recommendations in the U.S. Either the vaccines used were not licensed in the U.S., Rabies Immune Globulin was not administered, or the number of doses of vaccine recommended were higher than

the number recommended in the U.S. Consultations on these cases were held with the Centers for Disease Control and Prevention.

MULTI-PERSON INCIDENTS

Hawaii's first confirmed rabies case occurred in 1991 in a bat discovered in a newly opened shipping container on the dock.¹ Eight people were investigated for possible exposure to the bat, but none were deemed to have been bitten or exposed to the animal's saliva.

Following the circus elephant's rampage in Honolulu in August, 1994, the Department of Health's (DOH) Epidemiology Branch conducted a rabies exposure investigation of employer groups who had close contact with the elephant. The decision to conduct an investigation was made after the DOH laboratory reported suspicious fluorescence on brain smears from the elephant, suggesting possible rabies infection. A total of 46 employees of employer groups associated with the elephant or its carcass were interviewed. It was determined that if the animal were positive for rabies, eight of those exposed would need rabies post-exposure prophylaxis. Fortunately for those exposed, subsequent examination of the smears by the Centers for Disease Control and Prevention (CDC) indicated the smears were negative for rabies.

DOH SERVICES

Rabies post-exposure prophylaxis is indicated when a person has been exposed to an animal known to be a potential rabies reservoir in a rabies-endemic country. Most exposures occur from bite wounds from carnivorous animals. However, because several human rabies cases have resulted from contact with bats where there was no history of a bite wound, the CDC recommends post-exposure prophylaxis for all individuals in close contact with bats whether or not a bite has been observed.

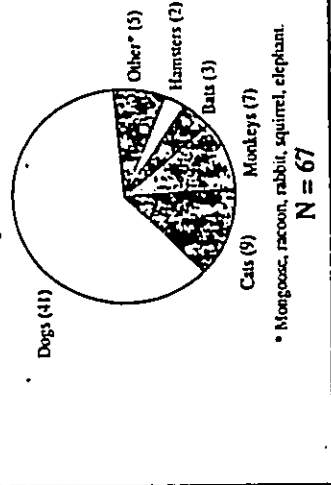
Rabies Surveillance

The DOH laboratory provides fluorescent antibody testing for rabies diagnosis in animal brain smears. The bat caught in 1991 was first suspected to be rabid through DOH testing, with the CDC subsequently confirming the diagnosis.

The DOH Vector Control Branch provides mongoose trapping and control services.

Other State sponsored rabies programs include the Department of Agriculture's (DOA) animal quarantine program, which also conducts perimeter trapping of mongooses and other stray animals around the quarantine station. These animals, as well as any that die in the quarantine station, are routinely tested for rabies by the DOH laboratory. The DOA also monitors investigation of illegal animal species, which includes most carnivorous animals.

Rabies Exposure Investigations in Hawaii by Animal Species: 1990-1994



For assistance in evaluating possible rabies exposures and/or obtaining rabies biologicals to prophylax a patient, please call the Epidemiology Branch in Honolulu at 586-4556.

REFERENCE:

1. Sakai, D.M., DVM, MPH, Middleton, C. R., M.S., Sawa, T. R., DVM, PhD.

Submitted by David M. Sakai, DVM, MPH, Veterinary Medical Officer, Epidemiology Branch.

Christensen, C. C., M.A.G., and Kobayashi, G. Y., B.A. Rabid Bat Diagnosed in Hawaii: A Case Report (1992). *Haw Med J*, 51(7), 181-185.

Gastroenteritis

warmer. Soup and hand towels were not accessible at the kitchen wall basin. Baked chicken from the caterer was found to contain *E. coli*, suggesting cross contamination of this product after cooking. Ice samples from ice makers also showed coliforms, not meeting the standards for drinking water. High levels of coliforms were also found in pot samples.

DISCUSSION

Even though *C. perfringens* was isolated from cases, there was no conclusive evidence available to confirm that the outbreak was caused by this organism. The clinical pattern was not typical of gastroenteritis caused by *C. perfringens*, and the organism was not isolated from the implicated foods.

Consumption of poi alone, could not account for all the illness reported in this

outbreak. However, ample opportunities for cross-contamination with other food items existed. It is possible that more than one food item was involved in the outbreak.

Recommendations for improvements in food handling practices were presented to the staffs at both the catering and luau sites. Continued surveillance of groups attending the luau indicated that no further illness was observed four or more days after the initial outbreak report was received.

Lowenstein MS. Epidemiology of *Clostridium perfringens* food poisoning. *N Engl J Med* 1972; 286:1026-8.

Submitted by: Myra Chung-Lee, M.P.H., Epidemiological Specialist, Aita Gilliam, M.P.H., Rubella Project Coordinator, and David M. Sakai, D.V.M., M.P.H., Veterinary Medical Officer, Epidemiology Branch

REFERENCES:

Birkhead G, Vogt R, Itoun E, Snyder J, McClane B. Characterization of an outbreak of *Clostridium perfringens* Food Poisoning by Quantitative Fecal Culture and Fecal Enterotoxin Measurement. *J Clin Micro Mar* 1988; 471-474

The number of incidents investigated over the past five years probably represents just the tip of the iceberg of rabies in Hawaii. The current cost of rabies post-exposure prophylaxis is \$966.00.

continued on page 6

Impacts of Agricultural Pests on Maui
(presented to Maui County Council)

Larry M. Makahara
Hawaii Department of Agriculture
Plant Quarantine Branch
August 17, 1995

A. Perspectives - On what we as an island society need or consume, what our inspectors inspect, what we intercept, and what the costs are of those we don't.

1. State/Federal Inspection Programs
 - a. USDA-APHIS-PPQ prevents entry of plant pests from foreign areas to the U.S. (including Hawaii). USDA also prevents entry of plant pests from Hawaii to continental U.S.
 - b. HDOA-PQ prevents entry of weeds, non-domestic animals (including insects) and microorganisms into the Hawaii from both foreign and domestic areas since 1880, when King David Kalakaua prohibited coffee plants to protect Hawaii's coffee industry.
2. Materials Inspected at State Ports-of-Entry
 - a. In 1994, we inspected over 13 million "agricultural parcels" entering the State. Agricultural parcels represent less than half of all materials entering the State.
 - Of these, over 20,000 parcels were intercepted.
 - Of these, over 15,000 parcels were treated and released.
 - Of these, over 4,000 parcels were rejected or destroyed.
 - Of these, 131 insects not known to occur in Hawaii were intercepted.
 - b. Also in 1994, investigations were conducted on 143 illegal animals.
 - In addition, the following were confiscated: various insects, ant farms, a bat, gerbils, tadpoles, giant mealworms, many snakes, monitor lizard, snapping turtle, wolf dogs, ferrets,

INFECTIOUS DISEASES

INTERNAL-MEDICINE WORLD-REPORT

Imported Malaria Remains an Important Clinical Problem

LEXINGTON, Ky.—The recognition of malaria in patients returning from endemic areas represents a significant challenge due in part to the variability of its clinical presentation, according to a report by a University of Kentucky research team.

Malaria remains an important clinical problem in nonendemic areas of the world because of increasing travel and immigration from endemic areas. Malaria is often misdiagnosed because the presenting signs and symptoms of the disease are nonspecific and its incidence is low in nonendemic areas.

To increase awareness of the variability of the clinical presentation of imported malaria, James E. Svenson, M.D., and his colleagues reviewed the hospital records of 482 patients in

whom malaria was diagnosed at one of two hospital-based tropical disease centers. The study group included immigrants (40 percent), tourists (31 percent), foreign workers (20 percent), and missionaries (6 percent).

Malaria was most often caused by *Plasmodium vivax* (51 percent) and *P. falciparum* (38 percent). The majority of patients from the Indian subcontinent were infected with *P. vivax*, while most of those from Africa had *P. falciparum* malaria.

Chemoprophylaxis was taken by 46 percent of the patients, and 46 percent of those who began taking chemoprophylaxis claimed that they were fully compliant with their medication. The major reason for noncompliance was failure to continue

chemoprophylaxis for at least four weeks after returning from an endemic area.

The mean time from symptom onset until physician contact was 6.7 days, and 40 percent of the patients first sought medical care within three days of symptom onset. On presentation, 36 percent of the patients were taking a nonmalarial medication prescribed for their current illness.

More than 95 percent of the patients presented with a history of fever, but only 51 percent had fever on the day of presentation. Other than fever, the most common symptoms were headache, malaise, and chills, and the most common physical abnormality was splenomegaly.

A positive diagnosis was made on

the first malaria blood smear in nearly all patients (98 percent). Anemia was present in 28 percent of patients, and 50 percent of the patients had thrombocytopenia.

The outcome was favorable in almost all patients. Only one death occurred, and the remaining patients responded to treatment regimens based on the infecting species.

Dr. Svenson and his colleagues observe (*Archives of Internal Medicine* 155:861-868, 1995) that no symptoms or physical signs were more common to a particular infecting species of malaria. They conclude that malaria must always be considered in any febrile patient from an endemic area, even if symptoms and signs are not suggestive of the diagnosis.

AIDS Report

Early ZDV Therapy in Asymptomatic HIV-Infected Adults: The Controversy Continues

Continued from page 1

counts were 500 per cubic millimeter or greater. Ninety percent of the subjects were white men; 69 percent were

had significantly higher incidences of severe anemia and granulocytopenia than those receiving placebo.

symptoms to enrollment in the study was 25.1 days. Among the 43 patients who still had symptoms, the mean du-

diatory nature of these new findings." Thus, according to Dr. Ho, "although attributable in part to the differences

hamsters, caiman, piranhas, lionfish, lizards, clawed frogs, eels, iguanas, snails, tarantula, toads, hermit crabs, honey bees, leeches, sharks, squirrel, yellow-jacket queens, owl, black widow spider, and a lungfish.

3. And yet, the consequences of those that "got away."
 - a. 19 new insects were found in Hawaii (yearly average).
 - b. 11 of which are potential pests to farmers, ranchers, homeowners, and private and public land managers.
 - c. 3-4 of which will become "real pests" resulting in a need to control them.

B. Pests on Maui Causing Damage

1. Old pest problems persist causing heavy economic losses for many years.
 - a. Diamondback moth - serious pest of cole crops (cabbages, broccoli, cauliflower) for many years. In recent years, Maui farmers reported losing entire fields. DM starts buildup in April; pest is a problem in drier months of Aug-Sep. Some feel Maui growers lost control of DM in 1992 because of increasing pesticide resistance. Some report cabbage production slipped by 30% in Kula in 1993.
 - b. Lesser Cornstalk Borer - Hawaii Commercial & Sugar (HCS; A&S) went to seed planting of new fields in central Maui rather than ratooning old fields. New seed requires more seed planting areas, more labor, more irrigation and, therefore, more costs.
 - c. Yellow Sugarcane Aphid - Situation is bad. In really dry areas, YSA infestations result in complete dieback and more erosion, weeds, need for reseeded. Getting worse over last 5 years. Need to buy feed, reduce herd size, send cattle earlier to feedlots, incurring higher costs. Kikuyu pastures in Hana, Haiku, Ulupalakua, Makawao, Kula, Kahakuloa are affected.
 - d. Silver Leaf Whitefly - Causes silvering of leaf on squash (transmits silver leaf virus); transmits different diseases on many different plants.

- e. Two Spotted Leafhopper - Kills uluhe in native forests from Haiku to Hana and in Kahakuloa, destroying watersheds making them prone to erosion.
- f. Tomato Spotted Wilt - Virus disease on lettuce, tomato.
- g. Gorse - In ranch lands and forests. In Haleakala National Park, Haleakala Ranch and Olanda subdivisions. DOA will be raising the gorse mite soon for biocontrol attempt.
- h. Miconia - Enough said by others.

2. Some New Pests on Maui that Could Cause Damage in Future

- a. Bougainvillea caterpillar - New to Maui (on Oahu for 1.5 years).
- b. Powdery mildew on bell pepper - On Maui and then on Oahu. Also reported on eggplant, tomato and other plants.
- c. Erineum mite - on Maui for couple of years on hibiscus.
- d. Solanaceous spider mite - On pepper, tomato, popolo berry during wet winter months. On Oahu also.

C. Conclusion

1. It is clear that the costs of prevention are much less than the costs of eradication/control or the cumulative costs of damages inflicted by these pests over many years.
2. Annual budget for State's prevention program (plant and non-domestic animal quarantine program) is \$2 million.



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
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KAHULUAPUANA
DIRECTOR
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GAILMAY OSMUNDI
Brian K. Mindeh

ENERGY CENTER
AIR-EN
97.1270

August 20, 1997

Steven M. Moser, M.D., F.A.C.P.
1883 Mill Street
Wailuku, Hawaii 96793

Dear Dr. Moser:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 8, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT 8M-1 - Internationalization

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. Please refer to attachment "International flights."

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments. They may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

Steven M. Moser, M.D., F.A.C.P.

AIR-EN
97.1270

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August 20, 1997

to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interin international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

COMMENT 8M-2 - Growth Impacts

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not

sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast." The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT 8M-3 - Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including; The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior, National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to

part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth, but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities.

This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a

be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOF issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOF. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide services to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOF have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT SM-4 - Premise of no additional growth

Contrary to your belief, there was no premise of no growth. The Draft EIS's conclusion on growth impacts were conclusions from the analysis in the technical Appendices E and N, and summarized in Sections 3.5, 3.6, 6.0 and 8.2 (Refer to response Comment SM-2 above on growth impacts).

Your four reasons for an increase in population: (1) Easier access to Maui with direct flights, (2) greater influx of construction concerns, (3) More interisland flights; and (4) Wider exposure of the island have been discussed in Sections 3.5, 3.6, and 6.0, and Appendices E and N of the Draft EIS. In addition, as discussed Section 4.2.24, it is more probable that the interisland market will grow with the No-Action scenario than with the Proposed Project.

In regards to "SASP reasoning flawed": we do not agree with your comments that the projections are flawed or illogical and your theory on the airport as a growth barrier. However, your comments will be made available to the decision makers prior to a decision on the Final EIS. The current runway system can accommodate the current and forecast aviation demand until the later part of the planning period (about 2016). For additional information on growth impacts see response Comment SM-2.

The No-action alternative ("no change" scenario) is discussed and analyzed in Section 4.2 of the Draft EIS. It is anticipated that the aviation demand for Kahului Airport will grow at the same rate with or without the Proposed Project.

COMMENT SM-5 - Issues not Adequately Addressed in the Environmental Impact Statement

A. Project Construction Impacts

Contrary to your assertion that there will be 10 years or more of

traffic impacts, the traffic impacts will be a short term impact as discussed in the Draft EIS. The traffic impacts are discussed in the attachment labeled "construction traffic impacts." There should be no highway traffic delays due to the runway apron construction.

B. Health and Medical Concerns

The Department of Health did have the opportunity to comment on the Proposed Project during the Scoping, Preconsultation, and EIS review periods.

The effect of the Proposed Project is discussed in Section 3.22.5 Health Care Facilities and Section 5.1.4.3 Regional Impacts - Health Care Facilities. The health care facilities on Maui is subject to insufficient funding, shortages of acute care beds and difficulties in hiring staff. The proposed airport improvements in and of themselves are not expected to affect or be affected by existing or planned health care services and facilities. The subject of Maui Memorial Hospital capacity has been and continues to be discussed by the State Administration and Legislature. It is recognized that improvements to the hospital are required. However, given present budget constraints, these improvements are not possible at this time. The lack of west side (Lahaina) medical facilities will not be impacted by the Proposed Project.

The bikeway and traffic issues are discussed in Section 3.22.8 and Appendix M. The airport is also providing airport right of way for the Northshore Greenway bikeway project. As stated in the Draft EIS, the traffic congestion on Maui's roadways will occur with or without the Proposed Project. It is not expected that the Proposed Project will impact the number of bicycle accidents on Maui. The construction of the Northshore Greenway bikeway may reduce the interaction of bicyclist and automobiles.

The short term impacts of construction and potential mitigation measures are discussed in Section 3.0 of the Draft EIS, for the corresponding impact categories. For overcrowding, please refer to response Comment SM-2 on growth impacts.

The U.S. Department of Public Health has the authority for inspection international flights for diseases.

Environmental Concerns

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS (Please refer to Response SM-3 above on alien species).

National Park Service (NPS) Participation

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process.

The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Air Traffic Accidents

The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix H ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current FAA standards, (ii) eliminating the trees which penetrate the approach surface to Runway 20, (iii) lengthening the runway for landings and aborted takeoffs, (iv) enlarging and relocating the displaced landing threshold for Runway 2, and (v) relocating the helicopter operations to a site further away from Runway 2-20.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights, reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing the amount of time aircraft spend circling the Airport, which, in turn, decreases that number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport.

Steven M. Moser, M.D., F.A.C.P.
Page 10
August 20, 1997

disagree with the findings of the EIS, your comments will be made available to the decision makers prior to the final decision on the Proposed Project.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachments as reference above

c: Federal Aviation Administration (D. Welhouse)

Steven M. Moser, M.D., F.A.C.P.
Page 9
August 20, 1997

For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

In regards to the use of the Reef Runway at Honolulu International Airport, Honolulu International Airport is expected to have significant aircraft delays in the near future. Therefore, we disagree that the Reef Runway is underutilized. The Reef Runway has served the intended purpose of increasing the airfields capacity and also alleviating noise impacts of the Honolulu area. As stated in the Draft EIS, the Proposed Project will remove the stopover flight demand at Honolulu International Airport, thereby delaying the need at Honolulu International Airport need for additional capacity. The Rapid Deployment Team is discussed in Section 3.22.5 of the Draft EIS.

Cost factors

Monies used for the preparation of the Draft EIS and that will be used for the construction of the Proposed Project are from the Federal Airport and Airways Development Act and the State's Airport Special Fund. These funds were generated from fees on airline tickets, commercial aircraft landing at the State's airports, airport concessionaires rents, and other aviation user fees. Therefore, money from the State's General Funds were not used in the preparation of the EIS or will be used in the construction of the Proposed Project. These funds are to be used for airport purposes, as stated in the Airport and Airway Improvement Act of 1982, as amended.

We disagree that consulting ASB Hawaii, the owner of the neighboring parcel, is a conflict of interest. In fact, as we are impacting their land, their input should be considered during the EIS process. If the land acquisition portion of the Proposed Project is implemented, the owners of the land will be fairly compensated. In addition, the Federal and State of Hawaii EIS process encourages all segments of society to participate in the discussion of the pros and cons of privately and publicly proposed projects. Please refer to the comment above regarding the National Park Service Participation.

COMMENT 8M-6 - Conclusion

We strongly take exception to your accusations of plotting and hiding false premises of the Draft EIS. The EIS has been prepared in an unbiased, objective and analytical manner. The EIS will not be withdrawn as you have suggested. Although you

DOCUMENT CAPTURED AS RECEIVED

DEPARTMENT OF TRANSPORTATION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PURCHOWEL STREET
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KAUAI HAVASUDA
DIRECTOR
REPUTATION
ALEXANDER OKAMOTO
URIAN K. HINAI

#REPLY REFER TO
AIR-EN
96-499

August 20, 1997

Ms. Rita Kay Mouren
P. O. Box 1092
Kihei, Hawaii 96753

Dear Ms. Mouren:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 22, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comment, which are attached for reference.

COMMENT RKM-1 - Purpose and Need for the Proposed Project

The purposes and needs and a statement of the objectives for the Proposed Project are described in detail in Section 2.3 of the Draft EIS. As indicated in the Draft EIS, the need for the Proposed Project, which includes several separate but interrelated projects, including lengthening of Runway 2-20, is based on forecast aviation demand at Kahului over the next 20 years. The general purpose and need for the Proposed Project are:

- To create an airport infrastructure which will support the present and future goals and objectives of the County and State.
- To continue to provide safe, efficient, economical, and convenient air transportation facilities for passengers and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands.

5-27-96
THE MOUREN'S
P.O. BOX 1092
KIHAI, HAWAII 96753

David M. House

From: A. O. House

Airports Dist. Office

P.O. Box 50244

Honolulu, HI 96850-0001

Dear Sir:

I would like to let you know that I have written back. Indeed - as the first I am so a great lengthening the main airport runway - that I felt it was my duty to write to you. I do not know of one person who wants the airport runway lengthened.

Maui is having a difficult time keeping up with the growth as it is. Our roads can not accommodate any more vehicles. We do not want to spend the money to increase the runway. The runway is much greater than any need. And really - what is the need? There is no runway expansion.

Maui, Rita Kay Mouren

See Comment
RKM-1

See Comment
RKM-2

See Comment
RKM-3

The overall goals are consistent with the Hawaii State Plan and the State Transportation and Tourism, Functional Plans and the Maui County General Plan.

COMMENT RKM-2 - Effect of Proposed Project on Roadway System

The probable effect of the proposed project on the surface transportation system of Maui is described in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the proposed project. The proposed project, when compared to the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the proposed project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT RKM-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.1.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the proposed project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the proposed project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been

Ms. Rita Kay Mouren
Page 4
August 20, 1997

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discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Mr. Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1314

BENJAMIN CAYTEANO
GOVERNOR



KAZUHIYASHIDA
DIRECTOR
HAWAII DIRECTORS
GAKUJI OKAMOTO
SHIAN K. MINAMI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MINERY REFER TO
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August 20, 1997

25-2724 Ina Street
Kahala, Hawaii, 96718
May 3, 1996

David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850

Dear Sir:

With the expansion of the Maui Kahului Airport to permit international flights to land on the island of Maui, Agricultural and animal inspection of such flights, is surely indicated. The National Park of Haleakala could be regrettably intruded by an introduction of potentially dangerous new species that could destroy the ecology of the unusual variety of habitats that the park currently protects.

Now is the logical time to take steps to prevent such an environmental disaster from happening.

Thank you for your attention,

Sincerely,

Lucille Mundy

V. Lucille Mundy

Ms. V. Lucille Mundy
15-2724 Ina Street
Kahala, Hawaii 96718

Dear Ms. Mundy:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 3, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT VLM-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

See Comment VLM-1
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See Comment VLM-100

Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT VLM-2 - Animal Inspection Services

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT VLM-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Department of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenario. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien

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Ms. V. Lucille Hundy
Page 4
August 20, 1997

species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5097

HAUWAIKANA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
GUYMON OSAWOTO
BRIAN K. MIHAI

WHERE REFER TO
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May 20, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, The National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,

Gordon Y. Muraoka
Gordon Y. Muraoka
345 Palama Dr.
Kahului, HI 96732

c: DOT - Airports Division
c: DOH - Office of Environmental O.C.

August 20, 1997

Mr. Gordon Y. Muraoka
345 Palama Drive
Kahului, Hawaii 96732

Dear Mr. Muraoka:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT GYN-1 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to

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terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. (See attachment "International flights")

COMMENT GYM-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce

growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared

by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT GYM-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT GYM-4 - Effect of Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT GYM-5 - Quality of Life

Quality of life is highly subjective and this concept varies for each individual. The Proposed Project is in keeping with the transportation and tourism goals and objectives of the State and County as outlined in the State Plan and Maui County General Plan. These plans take into consideration the quality of life for the majority of residents and visitors to Hawaii. The social impacts of the Proposed Project is discussed in Section 3.5 and 3.6 of the Draft EIS.

COMMENT GYM-6 - Growth Inducing Impacts of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

Mr. Gordon Y. Muraoka
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Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT GYM-7 - Potential Impact of Proposed Project on Infrastructure of Maui

The potential effects of the Proposed Project on Public Facilities, Infrastructure and Services, and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated in the Draft EIS, in general, the Proposed Project will have a beneficial effect on infrastructure components such as the road way system in and around the airport or not have an appreciable effect on infrastructure components, such as the electrical power generation, wastewater collection, treatment and disposal system, or potable water system of the island. As indicated in Section 2 of the Draft EIS, the Proposed Project is in response to existing and forecast increase in aircraft operations and passenger levels. These increases will occur regardless of the Proposed Project.

COMMENT GYM-8 - Effect of Proposed Project on Traffic

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several

Mr. Gordon Y. Muraoka
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After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

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Mr. Gordon Y. Muraoka
Page 8
August 20, 1997

Mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

COMMENT GYM-9 - Effect of Proposed Project on Noise

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

cc: Federal Aviation Administration (D. Weihouse)

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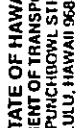
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KAUAIKAWA
DIRECTOR
1977-1981
GEMMA OSMOTO
BRIAN K. MINAMI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
840 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097



WILHELM R. TO
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CIVIL ENGINE

May 20, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, the National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,

Reginald H. H. H.
P.O. Box 1451
Honolulu, HI 96817

c: DOT - Airports Division
c: DOH - Office of Environmental Q.C.

August 20, 1997

Mr. Dwight Nakao
P. O. Box 1053
Wailuku, Hawaii 96793

Dear Mr. Nakao:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DN-1 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to

Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared

terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT DN-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the

Mr. Dwight Nakao
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COMMENT DN-5 - Quality of Life

Quality of life is highly subjective and the concept varies for each individual. The Proposed Project is in keeping with the transportation and tourism goals and objectives of the State and County as outlined in the State Plan and Maui County General Plan. These plans take into consideration the quality of life for the majority of residents and visitors to Hawaii. The social impacts of the Proposed Project is discussed in Section 3.5 and 3.6 of the Draft EIS.

COMMENT DN-6 - Growth Inducing Impacts of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

Mr. Dwight Nakao
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by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DN-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT DN-4 - Effect of Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT DN-7 - Potential Impact of Proposed Project on Infrastructure of Maui

The potential effects of the Proposed Project on Public Facilities, Infrastructure and Services, and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated in the Draft EIS, in general, the Proposed Project will have a beneficial effect on infrastructure components such as the road way system in and around the airport or not have an appreciable effect on infrastructure components, such as the electrical power generation, wastewater collection, treatment and disposal system, or potable water system of the island. As indicated in Section 2 of the Draft EIS, the Proposed Project is in response to existing and forecast increase in aircraft operations and passenger levels. These increases will occur regardless of the Proposed Project.

COMMENT DN-8 - Effect of Proposed Project on Traffic

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Mr. Dwight Nakao
Page 8
August 20, 1997

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97-1049

Mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

COMMENT DN-9 - Effect of Proposed Project on Noise

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

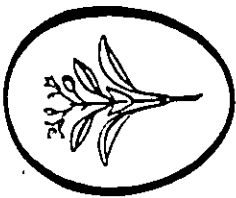
Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



NATIVE HAWAIIAN PLANT SOCIETY

P.O. BOX 5066, KAHULULU, MAUI, HAWAII 96732

Nānā nā pua o ka 'āina aloha

1554

PROPOSED EXPANSION OF KAHULULU AIRPORT--IMPACTS TO HALEAKALA NATIONAL PARK

By Don Reeser, Superintendent, Haleakala National Park 4/96

QUALITIES OF HALEAKALA NATIONAL PARK

Established in 1916, Maui's only national park, comprising 28,800 acres from 10,021 ft. elevation to sea level, is a national wilderness area, international biosphere reserve, and Maui's number one tourist destination receiving over 1.6 million visitors annually. It is the home of more endangered and threatened species than any other national park in the country. It is a partner in ecosystem preservation with surrounding land management organizations of east Maui.

WHY AN INTERNATIONAL AIRPORT ON MAUI MAY BE THE NATIONAL PARK'S GREATEST THREAT

Reputable ornithologists, botanists and ecologists can substantiate that new introductions of alien species arriving aboard foreign aircraft and becoming established in the very hospitable Maui environment represent a significant threat to the biotic resources of Haleakala National Park. It can be scientifically substantiated that virtually all organism extirpation and reduction of biological diversity in the park can be linked to the introduction (accidental or intentional) of non-native life forms. Furthermore, there is substantial evidence indicating that expanded foreign air service of the type that will be facilitated by the proposed airport expansion is a significant source of introduction of non-native life forms likely to damage the endangered, threatened and candidate species that inhabit Haleakala National Park. There is a very high probability of accidental or intentional introduction of non-native life forms if expansion of the airport results in expanded foreign air service.

Haleakala National Park's most critical concern for the airport expansion involves whether quarantine facilities and personnel will be adequate for handling of increased passengers and cargo. Honolulu International Airport is already a center for introductions of alien plants and animals to the Hawaiian Islands in spite of a well established system for detecting and disposing of potentially dangerous organisms. In spite of safeguards, two dozen new species become established in the islands each year. Many of these turn out to be destructive agricultural pests; others threaten the endemic Hawaiian plants and animals which survive largely in national parks and state forest and natural area reserves. One example of the alien introductions which can destroy our wildlife is the Brown Tree Snake native to Australia and Melanesia. This snake was accidentally introduced to Guam in the 1940s and has since destroyed almost all the native bird life of Guam. It also causes many millions of dollars of damage to agriculture and electric utilities on Guam. The snake is a prime threat for establishment on other islands in the Pacific, including the Hawaiian Islands, since it is abundant on Guam and seeks refuge during the day in dark places, such as cargo containers. Several of these snakes have been detected and destroyed on Oahu in the past few years.

Even the best quarantine facilities will not likely be able to cope with the thousands of potential insect introductions resulting from direct flights from tropical countries. Factors at Kahului Airport make it a much more hospitable environment for alien invasion than Honolulu International Airport which is currently at best a "leaky sieve." These include: moister climate, sugar cane fields nearby runways, prevailing winds blow insects inland and the elevation range to 10,000 ft. provides a great diversity of habitats for arriving aliens.

LEGAL AUTHORITY MANDATING PROTECTION OF NATIONAL PARK RESOURCES

The proposed airport expansion is a federal action subject to Section 7 of the Endangered

May 18, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse,

The Native Hawaiian Plant Society (NHPS) is a Maui-based organization devoted to the preservation of Hawaii's native plants. Since 1980, we have worked to expand native species populations in the wild, maintain native species plantings in gardens and sanctuaries, and educate the public through informational meetings and workshops. The NHPS Board of Directors is gravely concerned about the failure of the draft EIS on the Kahului Airport Expansion to address the issue of alien species introduction. Over and over again, both commercial agriculture and native forests have been devastated by an introduced insect, for example the two-spotted leaf hopper. This is no time to duck responsibility for dealing with this issue. The issue will not go away.

We are including Haleakala National Park Superintendent Don Reeser's article because we feel that it articulates many of the concerns of the NHPS on this issue, not just for Haleakala National Park but for Maui as a whole. Haleakala National Park is indeed an interested party in this issue and should have been included in all discussions of the matter. Their concerns with the problems of quarantine are our concerns. This EIS process should not go forward without a thorough treatment of the alien species issue!

Much more is at stake here than an attempt at a "quick fix" of our flagging tourism economy by making Kahului Airport available for international flights. The future of our native species is the future of our appeal as unique. Do not compromise our future by ignoring this problem. Deal with the issue of alien species introductions.

Sincerely,
Linda F. Nelson

Linda F. Nelson, President
Native Hawaiian Plant Society

cc: Miyamoto, Reeser
enc:

See Correspondence
See Correspondence
See Correspondence

1554

Species Act. Under that Act it is the duty of every Federal agency to "insure that any action authorized, funded or carried out by such agency... is not likely to jeopardize the continued existence of any endangered species or threatened species or resulting in the destruction or adverse modification" of the critical habitat of the species." 16 U.S. Code section 1536(a) (2)

The high probability of the intrusion of damaging non-native species into Haleakala National Park raises substantial prospect of a resulting damaging "use" of the park and the habitat of endangered species within the park. The threat of that impact is sufficiently significant that it may reasonably be considered as potentially falling within the "use" regulated by Sect. 4(f) of the Department of Transportation Act 43 U.S. Code Sect. 303(c), as well as the parallel provisions of the Airport and Airways Improvement Act.

Finally, the threat of these impacts also raises substantial issues concerning compliance with the basic legislative policies that govern protection of our national parks, including Haleakala. These policies are embodied in the 1916 National Park Service Organic Act, reinforced by the Redwood Amendments. These Acts require national parks to be left "unimpaired for the enjoyment of future generations," and also "the protection, management and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established."

DRAFT EIS FOR KAHULUI AIRPORT IMPROVEMENTS, MARCH 1996 VERSION

In 1993, the National Park Service requested the Federal Aviation Administration that it be granted Cooperating Agency status in the preparation of the federal EIS, but was denied despite the recommendations of the Department of the Interior (Office of Environmental Policy and Compliance) and the Environmental Protection Agency. As it turned out the National Park Service was not even consulted during the EIS preparation.

Unfortunately the EIS does not address impacts to the park. DOT/FAA concedes that there is an alien species problem statewide but does not acknowledge there are special problems associated with Kahului Airport environs and potential international flights to Maui. They lean entirely on the Alien Species Action Plan Project. It is clear they fear this topic could founder the entire project and require reconsideration of the threats of alien species invasions at Kahului Airport and perhaps other airports in the state.

They further obfuscate the main issue by stating there are international flights from Canada arriving already, and that if the airport is fully internationalized some additional permitting steps would have to be accomplished. DOT/FAA has purposely ignored the National Park Service's concerns. Skirting these issues is DOT/FAA's only hope in avoiding significant design and operational changes to protect Haleakala National Park.

SUMMARY

Haleakala is one of this country's 54 great national parks, an international biosphere reserve, a wilderness area and the home of more threatened and endangered species than any other national park. The park together with adjacent lands managed by The Nature Conservancy and State of Hawaii's Natural Area Reserve Department, represents perhaps the finest tropical rain forest in the United States. Not development, not human visitation, only alien species threaten this irreplaceable resource. Through aggressive resources management/research program the park is making real progress against established aliens and we are optimistic about the future of ecosystem preservation—but not if we have foreign flights landing directly on Maui.

Of our fifty-four national parks Haleakala is number 51 in land area. The average national park is well over twice the size of Maui. Haleakala is only 15 miles from the airport. It is too late to wage war against an alien organism only at the park boundary. In recent years we have attacked potential invaders outside the park through direct action and by making the public aware of the problem. The news media and public have been very cooperative in helping to eliminate threats to Haleakala.

This is more than just a local issue. We believe it ranks with external threats to other national parks, e.g. logging upslope of the tallest redwoods; geothermal development outside Yellowstone; reduced water supply to Everglades.

Instead of creating the probability of more alien introductions to Maui, the National Park Service believes all current avenues of evasion including present interisland air and shipping services should be closely scrutinized and adequate inspection and quarantine measures adopted.

The second edition of the Kahului Airport EIS has failed to confront the alien species issue head on. If this project is allowed to be implemented as is, it means disaster for Maui's unique native Hawaiian ecosystems that makes Maui such a special place for residents and visitors alike.

Donald W. Reiser

DELUKUMUJ CALETTANO
CONFIDENTIAL



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
669 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAZUHIYASHIWA
Director
DEPUTY DIRECTOR
GLENNIS OKAMOTO
Brian K. Mizuasi

REPLY REFER TO
AIR-EN
97.1056

Ms. Linda F. Nelson
Page 2
August 20, 1997
AIR-EN
97.1056

Ms. Linda F. Nelson
President
Native Hawaiian Plant Society
P. O. Box 5021
Kahului, Hawaii 96732

Dear Ms. Nelson:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 18, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT LFN-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 3.11.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the coordinating group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of

Ms. Linda F. Nelson
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COMMENT LPN-3 - Quarantine and Inspection Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

COMMENT LPN-4 - International Flights

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's Interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan

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50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT LPN-2 - Effect of Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

The NPS has been an active participant in the review of the Draft EIS and their expertise was sought in the development of the information provided in the Draft EIS regarding the alien species issue (see response above). We, too, value the NPS's expertise on ecosystem issues, which is why they have been an active participant in the preparation and review of the Draft EIS.

April 29, 1996

Mr. David Welhouse
US Dept. of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Honolulu, Hawaii 96850

Re: Kahului Air-port Environmental Impact Statement (EIS)

Dear Mr. Welhouse,

I have lived here on Maui for over fifty seven years. I was born and raised on this island. I feel I know more then most experts of trans-plant aliens to this island of what is good for Maui County and the need for it's people.

While I was a Youngster I worked in sugar and pineapple fields to make living, back breaking jobs with terrible working condition and very poor pay for the work done.

The very first break we had in the early 1960's was development of Hotels for tourist in Keenapali, this provided decent jobs for the locals and still does today. The personality of the locals and their attitude was half the cause of tourist coming back to maui.

Sugar and Pineapple jobs would never have been enough to provide jobs for all of us here, home grown products of Maui.

While I can understand the needs to provide tough control measurers to ensure unwanted alien animal and agriculture into Maui County but I certainly don't believe this would be grounds to deny the extension of the runway. While human aliens came to Maui and made Maui their home the locals never denied or beef over that, most of us welcomed them with aloha spirits, even knowing with them will come a change in our way of life. With them came the good and the bad.

I write to you in full support of the extension of the Kahului airport runway and let nothing stop this project.

We have lost too much in jobs and money already, it is time to move forward and you can help us in that direction.

Sincerely,
William "Bill" Nishibayashi
William "Bill" Nishibayashi
Maui Carpenters Union, Local 745
330 Hookahi Street
Wailuku, Maui, Hawaii
CC: Mr. Kazu Hayashida
File

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAHULULU OFFICE
DEPARTMENT OF TRANSPORTATION
GILBERT CHAN
BRIAN K. NIIMAI

REPLY BY DATE
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the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOF issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOF. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOF have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment will summarize the information that is available regarding the introduction of alien species, including

Mr. William "Bill" Nishibayashi
Maui Carpenters Union, Local 745
330 Hookahi Street
Wailuku, Hawaii 96793

Dear Mr. Nishibayashi:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your support and comment letter of April 29, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT WN-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOF). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOF is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOF initiated early and informal consultation with the FWS regarding

Mr. William "Bill" Nishibayashi
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information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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RECEIVED



MAY 3 1988

April 30, 1986

Dear Mr. Wellhouse,
 I am a concerned resident of
 Hawaii, also a concerned citizen of
 our Country - the great U.S.A. - So
 these concerns of mine to point out
 to you that the recent ETS inadequately
 address the most serious issue raised
 by regarding Kahului Airport: The
 need of withdrawing non-volatile species
 that be their phosphate or lead,
 the Federal Aviation Administration
 (FAA) has already indicated its belief
 that airport operations would pose
 no threat to endangered species.
 The ETS fails to establish protection
 and guidelines procedure for the airport
 itself and if international flight
 start landing without such procedures,
 the chances of disaster striking are
 multiplied exponentially.

(over)

See Comment LRO-3

See Comment LRO-1

See Comment LRO-2

See Comment LRO-4

The FAA and Hawaii Department
 of Transportation, joint authors
 of the ETS, have excluded the
 National Park Service from
 discussion. The Park Service
 is an steward of the land and
 resources of Kahului, not alone
 from the process under the
 auspices of the ETS. Request,
 as best

Emergency

Richard K. Odom

76-230 Olomea Place
Kailua-Kona, Hawaii 96740

MAUI AVIATION
DIVISION
1600 W. OMAHA STREET
GRESHAM OREGON 97030
BRITAIN K. MINKAI

DEPARTMENT OF TRANSPORTATION
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

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97-926

August 20, 1997

Mr. Leland R. Okura
96-230 Olomea Place
Kailua-Kona, Hawaii 96740

Dear Mr. Okura:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of April 30, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT LRO-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed

Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.1.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact of the Proposed Project may have on the introduction rate of alien species to Maui.

Mr. Leland R. Okura
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Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT LRO-2 - Quarantine and Inspection Services

The HDOOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT LRO-3 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

Mr. Leland R. Okura
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Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT LRO-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Weihouse)



HAZUNATAGHERA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII
BRIAN K. MINAII

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

DEPARTMENT OF TRANSPORTATION
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August 20, 1997

Phillip B. Olsen
2080 Mauna Place
Honolulu, Hawaii 968922
Tel. (808) 521-2630, FAX (808) 521-3378
E-mail tfekl7ae@prodigy.com
May 3, 1996

National Parks and Conservation Association
1776 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Refr. Hawaii Parks Alert: Airport Expansion on Maui

Gentlemen:

Normally, I am a supporter of the causes taken up by the National Parks and Conservation Association, of which I am a member in good standing. But I must strongly differ with your position on Kahului Maui's airport expansion.

Control of the introduction of alien species is the responsibility of both State and Federal agriculture agencies, already very alert and effective, to the best of my knowledge. I see no reason to block an urgently needed airport expansion for the reasons stated.

Furthermore, I am a frequent traveler to Kahului and enjoy the parks and wilderness of Maui greatly. I am uncomfortably aware of the limitations of the Kahului Airport, and one of the proponent-pilots for safety enhancements needed, including lengthening of the main runway.

Opponents of aviation facility improvements in Hawaii fail to reflect that there are no interstate highways, no tunnels between the islands, and no way to travel, save by air.

Please don't lend a hand to those who would make flying more hazardous in Hawaii. Drop the EIS opposition to expansion at Kahului.

Very truly yours,

Phillip B. Olsen
Phillip B. Olsen
CFII, ATP

cc: David J. Wellhouse
Jerry Matsuda

Mr. Phillip B. Olsen
2080 Mauna Place
Honolulu, Hawaii 96822

Dear Mr. Olsen:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your support and comment letter of May 3, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT PBO-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

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In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

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availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS

Mr. Phillip B. Olsen
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consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures").

COMMENT PBO-2 - Aviation Safety

The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix N ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current FAA standards; (ii) eliminating the trees which penetrate the approach surface to Runway 20; (iii) lengthening the runway for landings and aborted takeoffs; (iv) enlarging and relocating the displaced landing threshold for Runway 2; and (v) relocating the helicopter operations to a site further away from Runway 2-20.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights, reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing the amount of time aircraft spend circling the Airport, which, in turn, decreases that number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport.

For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

THE UNIVERSITY OF CHICAGO PRESS



May 20, 1990

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, the National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our drinking water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

Sincerely yours,

Crystal H. Paiva

c: DOT - Airports Division
c: DOH - Office of Environmental Q.C.

AIR-EN
96.502

Ms. Crystal G. Paiva
Mailing Address Unknown

Dear Ms. Paiva:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT CQP-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto

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Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the proposed project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT CGP-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior, National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future

expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact of the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be

Included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "Mitigation measures")

COMMENT CGP-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOF, Airports Division provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOF, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT CGP-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and International flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by

extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOF's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOF and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 5.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT CGP-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the Island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT CGP-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the Proposed Project. The Proposed Project, when compared to

the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT CGP-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOF, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and avigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

May 20, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I was recently informed that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, the National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

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Your response to these concerns would be most appreciated.

Sincerely yours,

Shelley Chu

c: DOT - Airports Division
c: DOH - Office of Environmental Q.O.

AIR-EN
96-501

Mr. Hester Paiva
Mailing Address Unknown

Dear Mr. Paiva:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT HP-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

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See Comment
HP-1 & HP-2

See Comment
HP-1 & HP-2

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has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT HP-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP project was made up of at least 20 state, federal and private organizations, including the FAA, The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

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availability of hotel accommodations; general economic conditions; and the marketing scenario. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact of the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the

biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT HP-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT HP-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an

increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

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- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast." The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and International Flight Operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT HP-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the Island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT HP-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the Proposed Project. The Proposed Project, when compared to

the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

COMMENT HP-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and avigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

Tropical Orchid Farm Huelo, Maui

To Owen Miyamoto, Airports Administrator
Department of Transportation
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96813

From Jeffrey Parker
P O Box 170
Haku, Hawaii 96708

Dear Sirs,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Kahului Airport Expansion (This written commentary differs from my oral testimony presented at the May 8, 1996 Public Hearing). As a farmer and agricultural products exporter, many of my comments pertain to my perceived threats to agriculture caused by this project and the failure of the DEIS to adequately examine those issues. The first section of my comments deal directly with these concerns. In addition, I have other concerns which I'll list in section 2 of this letter.

I believe the DEIS is flawed in many respects and should be withdrawn.

Section 1

Hawaii's agricultural industry grosses nearly 1 billion dollars per year, the third largest revenue source in the state (1) and diversified agriculture is the fastest growing sector of the State's economy (2). Hawaii's high islands and location in the tropics allows the cultivation of almost any tropical or temperate crop. The possibilities for innovative diversified agriculture are nearly limitless.

The primary advantage that farmers in Hawaii currently have over farmers elsewhere is the absence of many damaging insects, diseases and weeds. This advantage is rapidly disappearing because of the alien species invasion of Hawaii. Each year an average of 19 new insects are found in Hawaii, 11 of which are potential pests to farmers, and 10 eventually prove to be serious new agricultural pests. The figure of 19 new insects per year does not include non-insect pests like weed species, plant diseases, and other animals.

For example, fruit flies alone cost Hawaii 300 million dollars per year in lost markets for locally-grown produce (3), and the Formosan Ground Termite costs Hawaii residents an estimated \$100 million dollars a year, according to the UH College of Tropical Agriculture. Pests like these are impossible to eliminate once established in Hawaii. The effect is cumulative, and each new pest means increased costs in labor and increased pesticide usage for the farmer. The tendency of some insects to become

pesticide-resistant results in even more pesticides released into the environment. On Maui, this is a particular problem because most small farms are close to residential areas. Also, we should consider that increasing freight capacity into Maui will result in more cheap, foreign and domestic produce being imported. Because farms on the Mainland tend to be huge agri-businesses which use a lot of chemicals (including restricted chemicals), and because more and more produce will be imported from third world countries which still use many dangerous chemicals which have been outlawed in the U.S., any pests arriving in these shipments surely would have a greater built-in pesticide-resistance than the insects local farmers are currently battling.

Unless measures are taken to prevent their entry, an almost limitless number of alien species could become established in Hawaii. Airports have already been established as the "highest-risk pathway" (2). The arrival of the Brown Tree Snake is one of the most frightening possibilities. Others include, Taro Blight, a disease that has destroyed the entire taro crop in Western Samoa, Palm Lethal Yellowing Disease which has killed coconut palms throughout Central America, the Caribbean, and South Florida, the Fire Ant (*Solenopsis invicta*) from the Southern U.S., and Orchid Spike Blight from South East Asia, which could diminish Hawaii's orchid industry.

Considering the diversity of tropical forests, their plants, insects, and diseases, the possibilities of new introductions are nearly endless. Just as the four fruit fly species have crippled Hawaii's ability to export fruits, so could another insect species cause a quarantine ban to be placed on another Hawaii crop. Prevention is the only answer.

Even in times of fiscal abundance, the number of alien introductions has been unacceptably high. Now, while the Department of Agriculture is faced with massive budget cuts, the Department of Transportation proposes to put even more pressure on the system by transforming Kahului Airport into an international point of entry. Before the latest round of cuts, the Department of Agriculture employed 524 people. As of this month, the number is down to 370 (30%). (2) Furthermore, key facilities such as quarantine stations and sealed inspection buildings are either non-existent or deficient.

DEIS

The new joint State - Federal Draft Environmental Impact Statement (DEIS) is woefully inadequate in many areas, not least in the area of the Alien Species problem. The DOT has once again used its resources to produce a justification document. The EIS laws provide for a supposedly unbiased review of possible impacts. If studied, it will become clear that this EIS is completely biased in favor of the airport expansion. The document proposes no concrete "mitigation measures" to deal with the Alien Species Invasion.

To understand how this major and serious problem is explained-away in the EIS, we must look at two basic false assumptions that the consultants rely upon:

See Comment JP-1

End of JP-1

See Comment JP-2

- 1 The improvements being proposed have nothing to do with internationalization of the airport at this time. Since the 1993 Master Plan does not propose to add permanent international arrival facilities at Kahului Airport, this issue [internationalization] will be addressed in a future environmental document prepared for that purpose" (Sect. 2 5 23)
- 2 That the impacts on Alien Species introductions caused by the Proposed Project are insignificant "As the passenger levels and cargo/mail tonnage are similar in both the No-action and Proposed Project, the impact of the Proposed Project on alien species infestation is, in and by itself, insignificant" (Sect. 3 11 3)

In regard to the internationalization issue, we have only to look at recent events concerning direct JAL flights into Kailua-Kona Airport to see that Kahului Airport will be immediately internationalized as soon as a runway of sufficient length is constructed Japan to Maui would be a much more lucrative route than the Japan to Kailua-Kona route. In fact, JAL is chomping-at-the-bit to get direct flights into Kahului. In contrast to the EIS's implication that internationalization is something that is way off in the future (2010 A D) and something that may or may not happen, the EIS itself says "The Hawaii Dept Of Transportation cannot discriminate against any aircraft that wishes to use the airport" (Sect. 8.2 1) Further, the Pueo Coalition is listed in the EIS as being a consulted organization. The Pueo Coalition has publicly stated that it supports direct international flights

Regarding the "no significant impact" on alien species introductions asserted by the EIS, please consider the following

- a The largest body of scientists and biologists working on Maui (at Haleakala National Park) have grave concerns that the airport expansion will indeed impact native flora and fauna. Haleakala Nat Park requested to be a "Cooperating Agency", but was denied this by the FAA. Why? An unbiased review of the issues would welcome input from the islands' largest body of scientific experts.
- b Recently there have been massive budget cuts to the Dept of Agriculture, and even USDA is not immune to reduced budgets. The terrain, vegetation, and semi-rural landscape surrounding Kahului Airport, contrasted with the urban and concrete-paved environs of Honolulu International Airport, make it far more likely that an alien species could escape detection here. Everyone agrees that the number of alien introductions has been too high, and that the costs of dealing with alien introductions is increasing at a time when budgets are being drastically cut. Therefore, it makes a lot of sense to put our limited resources to the best use by concentrating all foreign arrivals at Honolulu International Airport, rather than spreading our remaining resources too thin by pushing for foreign arrivals at all the outer islands.
- c DOT and the EIS document seem to rely heavily on the ASAP Plan (the Alien Species Action Plan), which shifts responsibility for the alien species problem to

agencies other than DOT. Yet, the ASAP Plan itself says "The Working Group confirms that the alien pest problem is growing rapidly, and that existing programs for prevention and control will fail to protect Hawaii without significant improvements." The ASAP Plan also calls for "improving the coordination among public and private organizations." And finally, the ASAP Plan states "The current configuration of airports, harbor warehouses, and pest control research facilities is a significant impediment to improved pest prevention and control."

Considering that all state agencies charged with the responsibility of controlling alien pests have had their budgets drastically cut and that previous efforts, to a certain extent, have failed, and that DOT proposes no concrete mitigation measures in its EIS, but instead shifts responsibility to other agencies, and that the Kahului Airport Master Plan mentions no specific improvements in configuration that would facilitate improved pest prevention, it would seem that DOT is in conflict with the ASAP Plan, which it pervasively cites over and over again!

- d The EIS fails to propose or study real mitigation measures such as
 - 1 A state-of-the-art quarantine facility
 - 2 Sealed inspection buildings
 - 3 Creating a "biological desert" (paved areas) surrounding the airport

e The EIS implies that pests which reach Oahu probably will reach Maui anyway through inter-island flights or other methods. This is not necessarily true. Historically, there are pests on Oahu which have not made their way to Maui. Similarly, efforts to keep the mongoose from becoming established on Kauai have been successful. Additionally, the delay in time that it takes a species to migrate from Oahu to Maui has allowed for the development of effective biological controls in the past. Finally, consider the following theoretical example. A population of Brown Tree Snakes is discovered on Oahu. The state would immediately institute a strict inter-island quarantine. In this way, Maui (and other outer islands) would be afforded at least a degree of protection. If we internationalize, allowing direct flights from Guam, an inter-island quarantine would do us no good. The EIS fails to state this simple truth.

Recently, as a Certified Nursery Operator, I received a letter from the Dept. of Agriculture. Because of the threat from a new citrus aphid in Hawaii, Arizona has placed a quarantine ban on all Hawaii nursery products. Besides the financial impact of losing Arizona, we are afraid that this ban could be extended to neighboring Calif. Maui farmers need to understand that any new serious pest introduced to Hawaii could cause other states to place quarantine bans on our agricultural exports, thus potentially destroying the promising diversified ag industry. I don't see this issue even discussed in the DEIS.

Before expansion of Kahului Airport can even be considered, the number of alien species introductions statewide must be lowered dramatically, to approach the results obtained by the Government of New Zealand, where the number of alien species introductions is only a fraction of those here in Hawaii.

End of LP-2

See Comment LP-3

Additionally, there has been much talk about "increasing the freight capacity so that Maui farmers can ship out more of their products" I believe this is a phony issue invented by pro-runway and (then) councilwoman, Linda Lingle. Today, the only person still insisting that this is a valid argument is Maui Pineapples' Doug McClure. To be sure, no farm group (including the Maui County Farm Bureau) ever endorsed increased freight capacity as the reason to go ahead with this airport expansion. I do believe, though, that the DEIS should have studied impacts to local agriculture caused by the influx of cheap, foreign ag products INTO Maui, as a result of increased INCOMING freight capacity. The advent of NAFTA and GATT, combined with increased freight capacity and low "space available" rates, would guarantee that Maui farmers will be competing with more and more cheap Mexican or Chilean produce. One should consider that, because of the cheap land and low wages, a vegetable farmer in California's Central Valley can stay in business with a profit margin of only \$200 dollars per year, while a farmer in Kula, Maui must look for a margin of at least \$3000 dollars per year.

Once again, because the DEIS is essentially a justification document, which seeks to avoid mentioning real impacts, the idea that increased cargo capacity could flood Maui with cheap imported food, was not addressed. And I think it should be

Sources.

- 1 The Alien Pest Species Invasion of Hawaii Background Study and Recommendations for Interagency Planning The Nature Conservancy of Hawaii, Natural Resources Defense Council, July 1992
- 2 Tish Uehara, Deputy Director, Hawaii Dept of Agriculture (Personal Communication)
- 3 Impacts of Agricultural Pests on Maui (presented to Maui County Council) Larry M. Nakahara, Hawaii Department of Agriculture, Plant Quarantine Branch

Section 2

As I have previously stated, I believe this DEIS is inadequate. It appears that the "guiding light" for the preparers of this document was "how do we prepare a document which shows that there are no significant impacts to the Proposed Project?" Not, "how do we prepare a document which impartially looks at all the impacts?"

This is accomplished by the use of some clever strategies such as representing that the Proposed Project is not about internationalization. The emperor is wearing no clothes! Everyone, including the Governor, the Pucio Coalition, Maui Visitors Bureau, understand that the purpose of this project is to internationalize. The DEIS reveals its prejudice in statements in various sections of the document, most blatantly in Section 3.5.1.6 (Tourism)

- a The Japanese economy is showing signs of a mild rebound, including an increase in the number of international visitors

b The U.S. Dollar to Japanese Yen ratio has devalued, making overseas destinations like Hawaii more attractive to Japanese travelers

c Expenditures per visitor on Maui are lower than the state average, partly because the average Maui visitor is 1 American, 2 a repeat visitor, and 3 likely to stay in a condominium as opposed to a hotel. Japanese visitors generally stay in hotels and spend more on lodging and gifts.

And in spite of this pro-internationalization editorializing, the DEIS must continue to state that there are no plans for internationalization, because if it did not, then it would be required to examine the effects of internationalization per se.

Another clever strategy the preparers use is "project-splitting." By splitting the project into "phases" the preparers hope to get away without an adequate examination of the project in its entirety. This is clearly inconsistent with NEPA (National Environmental Policy Act) which requires an adequate EIS on the ENTIRE project. Because a project of this magnitude amounts to a long series of cumulative effects, the entire project must be examined in depth before any "phase" can be constructed.

I also have a lot of problems with the "need justification" for this project. For example the document cites the State's Tourism Functional Plan, which states: "The major objectives include development and maintenance of a well-designed, high quality visitor product Sect 2.3.1-1

I believe that the Proposed Project, with its 15 years of torn-up roads, detours, dust, and construction noise is in conflict with the Tourism Functional Plan. This year Maui County has had the best year on record for tourism. Why? Could it be that tourists want to come here BECAUSE we haven't paved-over the entire island?

In 1993, PATA (the Pacific Asia Travel Association) held their annual conference in Honolulu. Anand Panyarachan, former Prime Minister of Thailand, warned against tourism development that destroys the local cultures and environments. He said: "The environment and infrastructure are issues that affect tourism directly. Pollution, be it land, air, water or noise, should not be allowed to ruin what should be a positive holiday experience." "Call it what you will, Westernization or modernization, this phenomenon has the potential to erode the individuality of cultures. Culture is becoming increasingly homogenized around the world, with Western culture setting the trend. This may gradually undermine the very core of tourism. Tourism is one industry that thrives on differentiation. You don't fly halfway around the world to see something you already have at home. You want something different, something that's not available anywhere else. Disturbingly, we find travel destinations becoming increasingly like source countries."

"The long-term survival of the tourism industry depends on maintaining differentiation, not on promoting homogeneity. Preservation of cultural uniqueness and identity is crucial, for once homogenized, there is no turning back."

In section 2.3.1.3, the DEIS tries to show need by citing part of the Maui County General Plan, Economic Objectives, "To provide a balance between visitor industry

See Comment 47-5

See Comment 47-5

employment and non-visitor industry employment for a broader range of employment choices for the County's residents. This is very cynical indeed, given that the few speakers who spoke IN FAVOR of the Proposed Project at the May 8 Public Hearing, identified themselves as representatives of the tourism industry. I believe that the DEIS is in conflict with the above-stated portion of the Maui County General Plan because rather than providing a balance, the Proposed Project will tip the scales towards even more dependence upon the single industry, tourism.

I have a problem with Section 3.5.2 Impact Analysis. [The basic question when evaluating the proposed improvements is this: "Will the proposed improvements cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc beyond that which would occur if the proposed improvements were not implemented? Based on SIAR, the basic answer is no. Airport improvements do not, in and of themselves, cause more visitors to come to any destination. Such improvements may facilitate the travel of those who would come anyway and should allow the airport to operate more efficiently, but the conclusion reached in this study, which interviewed "experts" in the travel industry, . . . is that the proposed improvements will have little or no impact on long term growth levels.]

Wait a minute! Back in Section 2.3.1.1, the DEIS cites the Tourism Functional Plan, which says that "the proposed project will meet the Tourism Functional Plan's goals and objectives" because "this will allow the County of Maui to diversify its market mix of visitors and provide a more secure economic base." To me, this is in conflict with the DEIS' assertion in Sect 3.5.2, that "airport improvements do not, in and of themselves, cause more visitors to come to any destination."

Also quoted is the State's 1993 Amendment to the Hawaii State Plan Chapter 226, HRS. "Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives." Once again, I still question the conclusions of the SIA, the Socio - Economic Impact Assessment.

Other Concerns.

1 I don't understand how the construction of roads and other "improvements" through Phase 3, over the next 15 years, have "no significant impacts" Dealing with (omitted) up roads, detours, dust and noise for a significant portion of our lifetimes is clearly a major aggravation. This is insanity! Apparently, DOT wants us all to be "good little citizens" and put up with whatever it decides it is going to do! My objection is that the DEIS tries to build a case that "everything will be just fine", and "your lives will not change as a result of the project."

2 The proposed underground fuel line running through Kanaha Pond Wildlife Sanctuary. Once again, the DEIS delays discussing the impacts of this by using its strategy of "project-splitting". Just this week, there was a break in a similar pipeline running through wetland areas of Pearl Harbor. I think it is insane to put a fuel pipeline

through a wildlife refuge for the sake of mere "efficiency" or so that the fuel suppliers can operate a more profitable business. This, obviously should have been examined in the DEIS

Thank You,

Jeffrey Parker
Owner, Tropical Orchid Farm

End of 17-5

See Comment 17-6

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KAUHAUAWA
SECTION
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REPLY TO
AIR-EN
97-921

August 20, 1997

Mr. Jeffery Parker
Tropical Orchid Farm
P. O. Box 170
Haiku, Hawaii 96708

Dear Mr. Parker:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

We disagree with your opinion that the Draft EIS is flawed, and therefore, the Draft EIS will not be withdrawn. However, your comments will be made available to the decision makers prior to a final decision on the Proposed Project.

COMMENT JP-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior, National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural

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Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and COAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS. (See attachment "mitigation measures")

COMMENT JP-2 - Draft EIS

The Draft EIS was prepared in compliance with National Environmental Policy Act (NEPA) and the Hawaii Revised Statutes, Chapter 343 (HEPA). We disagree with your comment, that the Draft EIS was a "justification" document. However, your comments will be made available to the decision makers prior to a final decision on the Proposed Project. See response to Comment JP-1 on alien species.

- Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in

limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii and the FAA.

Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

- Puco Coalition

In the EIS process, many agencies and organizations were consulted as stated in the Draft EIS, Section 1.3, including the Puco Coalition. Public participation in the environmental review process is a crucial part of the NEPA and HEPA process. The success of NEPA and HEPA as an environmental disclosure and problem-solving law is based on open decision-making. Therefore, state and federal agencies must make diligent efforts to involve the public in implementing their NEPA and HEPA processes. Pursuant to these requirements of NEPA and HEPA, substantial efforts were made in connection with preparation of this EIS to involve the public in the environmental review process.

COMMENT JP-3 - NPS Participation in Preparation of Draft EIS

The Cooperating Agency issue is discussed in Section 1.3.3 of the Draft EIS. Additional information is provided below on cooperating agencies and the NPS request for cooperating agency status.

A cooperating agency may be any federal agency other than the lead agency that has jurisdiction by law or special expertise

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with respect to the environmental impacts expected to result from a proposal [40 CFR 1508.5; 1501.6]. An agency has "jurisdiction by law" if it has the authority to approve, veto, or finance all or part of the proposal [40 CFR 1508.15]. An agency has "special expertise" if it has statutory responsibility, agency mission, or related program experience with regard to a proposal [40 CFR 1508.26].

On the lead agency's request any other federal agency with jurisdiction by law or special expertise may be a cooperating agency. In addition, the lead agency may request any other federal agency with special expertise regarding any environmental issue to become a cooperating agency [40 CFR 1501.6]. A lead agency, however, is not required to designate an agency as a cooperating agency; rather, any such designation is discretionary.

Although an agency may not be formally designated as a cooperating agency, that agency may still participate extensively in the environmental review process by participating in the scoping process, developing information to be reviewed and, at the lead agency's discretion, included in the EIS, providing staff support in the EIS's preparation, and requesting a meeting with the lead agency to discuss the agency's concerns [40 CFR 1501.6].

The NPS requested that it be designated as a cooperating agency for purposes of preparation of the EIS for the proposed improvement projects. Although the NPS was not formally designated as a cooperating agency, the FAA and the HDOF used the environmental analysis and proposals from the NPS to the maximum extent possible in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

The NPS, U.S. Department of Agriculture (USDA) and Hawaii Department of Agriculture (HDOA) have been active participants in the preparation of the Alien Species Biological Assessment that will be included in the Final EIS. The FAA and HDOF, Airports Division, included the NPS as members of a Biological Assessment Technical Panel that provided key information and guidance to the FAA and HDOF, Airports Division, during the preparation of the Alien Species Biological Assessment. We, too, value the NPS expertise and are appreciative of the information they have provided regarding the alien species issue and potential impacts to Haleakala National Park as a result of the potential increase in the introduction of alien species.

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As stated in the Draft EIS, the USDA collects fee from international passengers and flight to support their services at the Airports. USDA has stated that they have adequate resources to inspect international flights at Kahului Airport if necessary.

Recently, HDOA's budget was increased to fund five additional inspector positions, that were previously funded by the HDOF, Airports Division. This funding by HDOF, Airports Division allowed HDOA to carry out more efficient processing of airline passengers. It is expected that HDOF, Airports Division, will continue to support HDOA to facilitate the inspection of airline passengers.

Please refer to the response to Comment JP-1 regarding aliens species.

COMMENT JP-4 - Increased Exports of Maui Products

The HDOA, as part of the overall state-wide effort to increase diversified agriculture in the state, is seeking ways to increase export shipping capabilities via air and surface transportation. It is expected that wholesale vegetable and fruit importers will import sufficient amounts of products to satisfy the demand for those products. Further, it is expected that if there are competitively priced locally grown products, these products will replace imported products. As you are aware, there are several local chefs, of international renown, who are promoting the use of local products and it will be up to the local producers to make their products competitive in price and quality with imported goods.

As stated in the Draft EIS, the existing runway length is sufficient for current and future aircraft landing at Kahului Airport. Therefore, the amount of cargo space available on incoming aircraft will not be impacted by the Proposed Project.

COMMENT JP-5 - Section 2

As stated earlier, we disagree with your comments about the adequacy of the Draft EIS. Please refer to the previous responses above on the Pucio Coalition, internationalization and alien species.

- Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in

international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

- Segmentation

The environmental analysis was performed in an objective manner consistent with the requirements of NEPA and NEPA. Nevertheless,

the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic and Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to

Mr. Jeffery Parker
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Your opinions will be part of the record and made available to the decision-makers prior to a final decision on the Proposed Project.

The Draft EIS has looked at the entire Proposed Project and has not been illegally segmented as you have stated. The Proposed Project comprises of various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and long-term (Phase 3), based on the existing and forecast aviation demand. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. As stated in Section 1.5.1, these long-range projects are analyzed in this Draft EIS to determine the individual and cumulative impacts as required by HRS Chapter 34J and NEPA.

However, given that the construction of these projects will occur, if at all, after the year 2009, and, more likely near or beyond the year 2016, the Draft EIS could only provide an assessment of their foreseeable potential impacts both individually and cumulatively. At this point in time, any more detailed analysis would be highly speculative and prone to error, for it is very likely that each of these long-term projects will undergo substantial changes over the next ten to fifteen years. For example, the scope, size, location and timing of the projects may be altered should air travel to and from Maui evolve and take shape differently than originally anticipated.

If and when the parallel runway, transient apron, helicopter facilities and fuel pipeline are defined in detail and submitted as projects to be implemented, each will be subjected to a more in-depth environmental review, either as a new analysis or supplemental to this EIS, as required by state and federal law, e.g., Environmental Assessments, Findings Of No Significant Impacts (FONISIs) or Environmental Impact Statements.

The fact that the Draft EIS cannot provide a comprehensive environmental review of the long-term projects does not mean that the Draft EIS is deficient. Under NEPA, multi-stage projects such as this one can be "segmented" so long as the portions of the project that are fully analyzed in the Draft EIS meet the following criteria: (i) they have substantial independent utility; (ii) they do not foreclose the opportunity to consider alternatives to the more speculative, long-term projects that will be studied later; and (iii) they do not irretrievably commit federal funds for those projects.

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The short-term (Phase 1) and medium-term (Phase 2) projects proposed for Kahului Airport and analyzed in the Draft EIS meet these three criteria. Each has substantial and independent utility. In fact, even if the Phase 3 projects were never implemented, the Phase 1 and Phase 2 projects would still be necessary and would still serve their intended purposes. The Phase 1 and Phase 2 projects also do not foreclose the opportunity to consider alternatives to the Phase 3 project proposals. (See attachment "segmentation")

COMMENT JP-6 - Construction Impacts

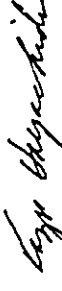
The construction impacts for the Proposed Project is addressed in Section 3.0 of the Draft EIS, in the related sections. As for the traffic impacts during construction, refer to the attachment "construction traffic impacts."

COMMENT JP-7 - Fuel Pipeline

The fuel line from Kahului Harbor to the Airport would be underground and outside of the Kanaha Pond Wildlife Sanctuary (KPWS) and designed consistent with State and Federal Standards to minimize any impacts to the KPWS. As stated in the Draft EIS, as the fuel line is a long-range project additional environmental analysis will need to be performed prior to the implementation of the Project. Please refer to the response to Comment JP-5 on Segmentation.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

To: David J. Welhouse
From: Eugene L. Parra

Dear Sir,
This letter is my testimony on the EIS process before the final tally. I have attended the previous meeting down at Gate 39 and offered my testimony there as well. I still am unchanged in that I see this as being detrimental to our fragile ecosystem or what's left of it. Since the invasions of banana poke and micronia, choking off our native species of plants and also aggressive varieties of birds and insects, taking rapid hold with no natural predators occurring to halt their proliferation, means I will not stand by without letting my testimony be heard. This project will have way to big of an impact we don't even know. This is what I mean as fragile.

I have worked as an Operating Engineer on many jobs ranging from the dredging of the reefs to build the reef runway extension on Oahu. This was supposed to be for the landing of the Concorde Super Sonic, which never has arrived here. Instead, massive amounts of fuel are spent taxing to and from the terminals. So I understand that what projects are intended for can turn out to be something else. On Maui, I've helped build Piihahi Highway, sewage treatment plants, golf courses to the water lines to make it all possible to build out Wailea and Makana.

I also have been without work for a year now, and to me, the ethics versus jobs, has come into play. In this line of business there is big bucks for labor. I find myself unemployed alot. Most people in this line of work don't care unfortunately. Money always has its way. I would hate to live to regret this one, knowing I could have made a difference in the quality of life here on Maui. Living on Oahu for at least two years showed me that there is great beauty and magnificence there. I can't help but think that the quality of life is compromised because of the noise, people and crowding. Maui, at this time is nowhere set-up to handle this impact. I know our leaders and fellow Operators see dollar signs and that's as far as they concern themselves. Truly for them, as long as they get their share of what life offers them, that is as far as they can see. That's a shame. Most don't appreciate what they have.

What about the noise level? I can hear the jet engines from Pukalani, from jets allowed here already. In paddling canoe along the coast from Kanaha to Baldwin Beach, the level of noise over the water is unbearably loud. What of the marine life and the impact on that section of the critters underwater? What of the drainage problem with the wetlands area next to the airport? Could this as a result dry up Kanaha Pond? There are migratory fowl which depend on that area for resting.

The superintendent of Haleakala Park has a great concern for the impact this will bring to the ecosystem of Haleakala.

If the Ag. inspectors are already under staffed to handle the influx of visitors, now using the honor system, to make everyone's job easier, then what will happen when International flights begin here. All the sneaky Pate's who love to stir up trouble to make their marks. We will pay and the future generations as well. Strange days will indeed occur as a result from the viruses directly imported from international flights. Live Scarab beetles from South America were caught, worn as ornamental jewelry on some unsuspecting tourist on Oahu. Luckey a sharp eyed inspector noticed. Had it gotten away the result would have been undesirable. Excuse me, am I missing something.

The people who live in Sprecklesville already complain about the noise level and the planes which fly during the night. Some of these people are medical personnel who aren't getting proper sleep as a result of the noise already. What will happen when direct international flights are allowed to bombard our small place with jets at all hours of the night? Will we all suffer for a goodnights sleep?

Let's not kill the goose that laid the golden egg. If people want to get here, they will. Smaller and quieter jets are being built as I write this. Use those planes if safety is such a concern. Use the money earmarked for this unnecessary project for the kids in school, that's where we need that money to go. With the construction industry constantly complaining about jobs; it's never enough when that is a concern. They all have big appetites. We need to be more creative. Listen to the concerns of the Hawaiians. Why are the Kapunas and Kahunas concerned? They know the spirit of the aina magic which lures visitors here will be gone and the complaints about traffic will be non-stop. I've never seen an overpass built or a normal expeditious highway built on Maui. On Piihahi at least we crossed four streams and actually built four bridges.

So I'm definitely against 96 in '96. I want to preserve Maui intact for the way she was and as is. I'll find something else to do. I was a S.C.U.B.A Instructor before and see first hand the fallout from cane fires smothering the reefs and the proliferation of algae due to runoff from the canefields. Enough already. It is upsetting. If your not part of the solution then your part of the problem. I prefer the former if your asking for public input.

Mahalo for your consideration,
Sincerely,
Eugene L. Parra



See Comment ELP-7

See Comment ELP-8

See Comment ELP-5

See Comment ELP-1

See Comment ELP-2

See Comment ELP-3



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAUAI/KAHOOLA
DIVISION
IDENTIFICATION
GLENDA OKAMOTO
BRIAN K. MINAMI

REPLY REFER TO
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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the MPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the

Mr. Eugene L. Parra
1135 Makawao Avenue
Makawao, Hawaii 96768

Dear Mr. Parra:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. M1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT ELP-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

Mr. Eugene L. Parra
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Information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT ELP-2 - Purpose and Need for Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT ELP-3 - Aircraft Generated Noise

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures were warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant

Mr. Eugene L. Parra
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increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures.

A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

COMMENT ELP-4 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the DOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

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COMMENT ELP-5 - Preservation of Maui

As indicated in the response to comment ELP-2 above, one of the purposes of the Proposed Project is to provide Maui with an airport facility that meets the forecast demand and operates efficiently. The Proposed Project is not forecast to cause growth of the island, but responds to forecast future growth.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DATE 5-17-96

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAZUHIKASA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
GENERAL MANAGER
BRIAN K. KUNAI

REPLY REFER TO
AIR-EN
97.820

Dear Mr. Owen Miyamoto,

The EIS inadequately address the most serious issue raised by expanding Kahului Airport: the risk of introducing non-native species. It is therefore unacceptable. In fact, the Federal Aviation Adm. (FAA) has already indicated its belief that airport expansion would pose no threat to endangered species.

The EIS fails to establish inspection and quarantine procedures for the airport. If international flights start landing without such procedures, the chances of disaster striking are multiplied immeasurably!

The FAA and Hawaii Dept. of Transportation, joint authors of the EIS, have excluded the National Park Service from discussions. The Park Service is our steward of the land and resources at Haleakala; its absence from the process makes the conclusions of the EIS suspect, at best!

Sincerely,
Cynthia Parton
P.O. Box 935
Haiku, HI. 96708

PAGE

PREPARED BY

Ms. Cynthia Parton
P. O. Box 935
Haiku, Hawaii 96708

Dear Ms. Parton:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 17, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT CP-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT CP-2 - Quarantine and Inspection Services

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose for consulting these agencies is to assure the new facility contains the equipment and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT CP-3 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis. Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop,

that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Ms. Cynthia Parton
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direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")


COMMENT CP-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Waihouse)

MAY 8 1996

Godwin J. Pelissero, Jr.
Post Office Box 308
Pukalani, HI 96785-0308
May 6, 1996

David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50214
Honolulu, HI 96850

Dear Sir:

I am writing to you regarding the proposed expansion of the Kahului Airport here on Maui. There are issues that have not been examined that threaten the quality of life and therefore the economic viability of Maui.

A recently completed environmental impact statement (EIS) inadequately addresses the most serious issue raised by expanding Kahului Airport: the risk of introducing non-native species; in fact it virtually ignores the issue. It is therefore unacceptable. In fact, the Federal Aviation Administration (FAA) has already indicated its belief that airport expansion would pose no threat to endangered species.

The EIS fails to establish inspection and quarantine procedures for the airport. If international flights start landing without such procedures, the chances of disaster striking are multiplied immeasurably. Even with improved inspection, alien species such as the brown tree snake, falling from open landing gear wells miles from the airport, is inevitable.

Nothing can guarantee that exotic species won't be introduced into Maui and Haleakala National Park, but if international flights land at Maui's Kahului Airport as currently planned, the chances for a biological catastrophe will be enormous. The airport is only 1.5 miles from the park, and much of the area in between is fertile agricultural land planted in sugar cane, unlike the inhospitable environment around Honolulu International. On top of that, Haleakala has an unusual variety of habitats, at altitudes from sea level to 10,000 feet, ideal for a wide variety of invading species to become established.

The FAA and Hawaii Department of Transportation, joint authors of the EIS, have excluded the National Park Service from discussions. The Park Service is our steward of the land and resources at Haleakala; its absence from the process makes the conclusions of the EIS suspect, at best.

I urge you to block any expansion of the airport until these issues have been addressed and resolved. This is the single most important issue facing Maui County today. Quality of environment means revenues from tourist dollars and therefore affects you directly.

Sincerely,



Godwin J. Pelissero, Jr.

See Comment CFP-1

See Comment CFP-1

See Comment CFP-1



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAUAI HAWAIIAN
DEPARTMENT OF TRANSPORTATION
GEMMAN (MAMOH)
BRIAN K. MINAHI

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Mr. Godwin J. Pelissero, Jr.
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Mr. Godwin J. Pelissero, Jr.
P. O. Box 308
Pukalani, Hawaii 96788-0308

Dear Mr. Pelissero:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 6, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT GJP-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, the Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the proposed project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to adversely affected by the proposed

Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

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Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT GJP-2 - Quarantine and Inspection Services

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT GJP-3 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

Mr. Godwin J. Pelissero, Jr.
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Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT GJP-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

JUN 27 1996

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 KUNIAHONOHONO STREET
HONOLULU, HAWAII 96813-5097

KAHULULU AIRPORT
IMPROVEMENTS
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 KUNIAHONOHONO STREET
HONOLULU, HAWAII 96813-5097



RENAISSANCE
WAILAEA BEACH RESORT

June 21, 1996

Mr. Dave Welhouse
FEDERAL AVIATION ADMINISTRATION
Honolulu International Airport
Honolulu, Hawaii 96813

SUBJECT: AIRPORT EXPANSION

Dear Mr. Welhouse:

The purpose of this letter is to express my thoughts pertaining to the expansion of the Kahului Airport Runway. The decision, on this issue, is of extreme importance to me, the Renaissance Wailea Beach Resort, and to the residents of Maui.

Although I am new to this island, I am not a stranger to the importance of economic growth, development, safety, and comfort to the community. Such features are critical to survival in today's world. Should the Kahului Airport Runway Project not happen, quite detrimental results would occur.

The suggested improvements to the airport, including the 2600 foot main runway expansion, would insure the future success of tourism on Maui. 33% of Maui County workers are employed in the visitor industry. Maui's job situation is growing tighter and tighter and unemployment is over statewide average rates. If tourism grows, unemployment then decreases. No one can argue that this fact is not a tremendous benefit.

Visitors spend more than two billion dollars annually. These expenditures result in increased income and tax revenues. A healthy economy will also enhance property values and, therefore, increased dollars to the County.

The conversation of this topic is not complete without considering the element of passenger safety. The current runway length and width leave little margin for safety. It also must be noted that if larger planes can take off and land, fewer airplanes will be required, and actual traffic would decrease along with the element of danger. The suggested plan will also create a reduction in noise which has been a continuous problem for the Kahului area.

Inhibiting the Kahului Airport Runway expansion would be a mistake. For those who believe that such a decision would control growth, they would be mistaken. Leaving the facility in its current state would only continue to inconvenience our residents as before. As a result, nobody wins!

Atolia

Jerry Phelps
General Manager

1550 Wailea Alanui Drive, Wailea, Maui, Hawaii 96753 Telephone: 1-808-939-6000 FAX: 1-808-939-4011
RENAISSANCE HONOLULU AIRPORT

August 20, 1997

Mr. Jerry Phelps
General Manager
Renaissance, Wailea Beach Resort
3550 Wailea Alanui Drive
Wailea, Hawaii 96753

Dear Mr. Phelps:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your support of the Proposed Project and your comments on the Draft EIS. Your comments will be made available to the decision makers prior to a final decision on the Proposed Project. This letter is in response to your comments of June 19, 1996 which are attached for reference.

COMMENT JP-1 - Aviation Safety

The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix N ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current Federal Aviation Administration (FAA) standards; (ii) eliminating the trees which penetrate the approach surface to Runway 20; (iii) lengthening the runway for landings and aborted takeoffs; (iv) enlarging and relocating the displaced landing threshold for Runway 2; and (v) relocating the helicopter operations to a site further away from Runway 2-20.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights, reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing the amount of time aircraft spend circling the Airport, which, in turn, decreases that number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport.

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Mr. Jerry Phelps
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For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

COMMENT JP-2 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and avigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1625

MAUI AIR TRAFFIC ASSOCIATION INC.

MAUIANS CONCERNED WITH QUALITY AIR TRAFFIC GROWTH

May 23, 1996

Office of Environmental Quality Control
State Department of Health
Central Pacific Plaza, 4th Floor
220 S. King Str.
Honolulu, HI 96813

RE: COMMENTS UPON DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE KAHULUI AIRPORT

Aloha--

Maui Air Traffic Association wishes to go on record with the opinion that the DEIS for the subject project is inadequate for the following reasons:

- 1) Inadequate evaluation of the possible problems associated with alien species of plants and pests.
- 2) Inadequate evaluation of the impact of Kahului Airport becoming an International Airport serving a global market.
- 3) The erroneous premise of the DEIS that claims that the longer runways/expanded airport will not in themselves induce air (and automobile) traffic growth, as well as give rise to additional population growth.
- 4) The effect of increased air traffic noise on the resident population has been underestimated with respect to quality of life and physiological well-being for those living within the environs of Kahului Airport.

See Comment SJP-2

This document should not receive approval in its present form. No airport improvements should take place until all of the above items have been analyzed and all of the parties involved have been consulted for their input and opinion.

Last but not least, the project should have the support from the majority of Maui's residents -- a factor which I believe is lacking at this point in time.

Sincerely,


Stephen J. Pili, President

cc: Mr Owen Miyamoto, Airports Administrator
David Welhouse, Federal Aviation Administration

SJP has
revised

A NON PROFIT CORPORATION

P. O. BOX 109 PAIA HAWAII 96779

A NON PROFIT CORPORATION

P. O. BOX 109 PAIA HAWAII 96779

MAKUHANA
DEPARTMENT
CALIFORNIA
BRITAIN K. HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

MAKUHANA
DEPARTMENT
CALIFORNIA
BRITAIN K. HAWAII

Mr. Stephen J. Pitt
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AIR-EN
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In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of

Mr. Stephen J. Pitt
President
Maui Air Traffic Association, Inc.
P. O. Box 109
Paia, Hawaii 96779

Dear Mr. Pitt:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AK1011-07

Thank you for your comment letter of May 23, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT 8JP-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.1.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including the Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

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50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT 8JP-2 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The

Mr. Stephen J. Pitt
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decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the IIPOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. (See attachment "International flights")

COMMENT 8JP-3 - Growth Inducing Impacts of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui.

According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic.

Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County

Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT 8JP-4 - Increased Air Traffic Noise

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs is discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs.

With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

Quality of life is a subjective issue with different meanings and values for each individual. The proposed project has been planned to improve the overall quality of life of all Maui residents by providing a safe efficiently operating airport.

COMMENT 8JP-5 - Support For Proposed Project

The Proposed Project has received overwhelming support from the County Administration, County Council, major business associations, and a number of residents and visitors to Maui.

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII

PAQUINAWA
DIRECTOR
DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097



PHOTO REFERENCE
AIR-EN
97.1237

May 23, 1996

Governor Benjamin Cayetano
State of Hawaii
c/o Office of Environmental Quality
Control
220 S. King St., 4th floor
Honolulu HI 96813

David Hinson, Administrator
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

Re: Comments upon the Joint Federal and State Draft Environmental
Impact Statement for proposed Kahului Airport Improvements

Dear Governor Benjamin Cayetano and Federal Aviation Administrator David
Hinson:

H.A.R. Section 11-200-15(a) states that in the preparation of an Environmental
Impact Statement, "...proposing agencies and applicants shall assure that all
appropriate agencies ... and other citizens groups and concerned individuals ... are
consulted."

Haleakala National Park was one of those "appropriate agencies" which should
have been consulted but was not. The DEIS states that the Park is twenty miles from
the airport and therefore too far away to receive any negative impact from the
extension of the airport runway. A change in one place affects another. Twenty
miles is not too far away; twenty miles is all too close. Park staff have understanding
and experience of the dangers and effects of alien species introductions and their
negative impact upon the fragile eco-system of Haleakala National Park. The DEIS
needs to be withdrawn and rewritten to properly include Haleakala National Park as
a consultant.

Kanaha Pond Wildlife Sanctuary is right next to the Kahului Airport.
Approximately 75% of alien species introductions arrive through airports. Without
the buffer of miles of concrete, such as at Honolulu Airport, alien species can easily
make their way to the Kanaha Pond Wildlife Sanctuary and to the fields around the
airport, causing significant harm to the endangered species and wildlife of the area
(and from thence to the whole of Maui). An alternative which should have been
studied is whether or not there should even be an international airport on the
island of Maui. If there were only one international airport, in Honolulu, all efforts
and funds to detect and intercept alien species could be focused there. The DEIS
needs to be withdrawn and rewritten to include this alternative.

Sincerely,

Judy Plummer

Judy Plummer
PO Box 990
Haiku, Maui, HI 96708

Ms. Judy Plummer
P. O. Box 990
Haiku, Hawaii 96708

Dear Ms. Plummer:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 23, 1996 on the Draft
EIS for the proposed Kahului Airport Improvements. This letter
is in response to your comments, which are attached for
reference.

COMMENT JP-1 - National Park Service (NPS) Participation in the
Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and
Haleakala National Park. Although the NPS was not formally
designated as a cooperating agency for the preparation of this
EIS, the Federal Aviation Administration (FAA) and the Hawaii
Department of Transportation (HDOT), Airports Division, provided
the NPS with numerous opportunities to provide input during the
EIS process.

The NPS has been an active participant in the EIS process, has
provided information for the preparation of the EIS, and has
reviewed the Draft EIS. The FAA and HDOT, Airports Division, has
used the information provided by the NPS in the preparation of
the Draft EIS consistent with their responsibilities as lead
agencies.

In addition to their participation in and review of the Draft
EIS, their expertise was sought in the development of the
information included in the biological assessment on the alien
species issue. The NPS is a member of the Biological Assessment
Technical Panel and has provided scientific reference materials
as well as direct experience in the area of alien species impacts
and control.

See Comment JP-1

See Comment JP-1

Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ACAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and in the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT JP-3 - One Central International Airport Alternative

There are currently five airports in Hawaii; Honolulu International Airport, Kahului Airport, Hilo International Airport, Lihue Airport and Keahole International Airport, which have or currently receive international flights. You assume that without the Proposed Project, international flights would not occur at Kahului Airport and that HDOT, Airports Division, and FAA can dictate what flights arrive and depart at the Airport. However, as stated in Section 8.2, international flight are currently occurring at Kahului Airport without the Proposed Project. In addition, international flights could occur on a one-stop basis without the Proposed Project, as with Japan Airlines' (JAL) bilateral agreement. The existing facilities,

COMMENT JP-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the

Ms. Judy Plummer
Page 4
August 20, 1997

AIR-EN
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can physically accommodate either one-stop or non-stop international flights operations.

The decision to initiate one-stop service to Maui from Japan is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. The HDOT, Airports Division and FAA cannot prevent international arrivals at the Airport; therefore only "allowing" international flights at Honolulu International Airport is not a reasonable or feasible alternative.

International service is different from domestic services in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

The issue of the "introduction rate" of alien species is addressed for the Proposed Project and the alternatives in the Draft EIS. This has been discussed in this response letter, Comment JP-2, and is an existing problem and will not be solved by not making Kahului a non-international airport, as alien species are currently introduced through many pathways, including interisland and domestic overseas flights.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

C: Federal Aviation Administration (D. Weihouse)

Mr. Christopher Pope
Page 3
August 20, 1997

regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT CP-2 - Inspection and Quarantine Facilities

The HDOT, Airports Division, is committed to the design and construction of new air cargo facilities as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport.

COMMENT CP-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Mr. Christopher Pope
Page 2
August 20, 1997

candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with Draft EIS

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1482



DAVID Wellhouse
Federal Aviation Administration
Airport District Office
Box 50244
Honolulu, HI 96853

May 16, 1996

Dear Mr. Wellhouse,

I am against the expansion of the Kahului Airport on Maui and I wish you to know that I worry about the introduction of species of plants & reptiles that will have a devastating effect on native species. The National Park is a unique ecosystem and needs to be protected from alien species.

Also the infrastructure of Maui; roads, water, power lines is barely adequate to sustain life and growth now. The land fill problem also makes one wary of bringing in more people and business.

On another point, the helicopter noise from flying low to the ground is very obnoxious around Eulawa High School in Wailuku. Why the FAA has allowed this to happen is beyond my understanding. These pilots have no consideration for the peace and quiet of the community. Thank you.

Deanna Rasmussen
Community Rotary

ONE NORTH KAMIELE DRIVE, KOHALA COAST, ISLAND OF HAWAII 96741 (808) 885-3400 FAX (808) 885-5776

DEPARTMENT OF TRANSPORTATION
COMMUNICATIONS SECTION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PURCHIKOWI STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Ms. Deanna Rasmussen
P. O. Box 1171
Kula, Hawaii 96790

Dear Ms. Rasmussen:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 16, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DR-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

HAZUWAFACOMBA
MAIL ROOM
COMMUNICATIONS SECTION
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BRIAN K. MINAI

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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.1.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DR-2 - Effects of Proposed Project on Island Infrastructure

The potential effects of the Proposed Project on Public Facilities, Infrastructure and Services and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated, in general, the proposed project will have no significant adverse effect on the water supply, wastewater collection, treatment, and disposal, telecommunications, police, fire and public safety, and schools of the island. There will be positive effects on the recreational facilities and roadway systems in the vicinity of the airport.

COMMENT DR-3 - Helicopter Generated Noise

Airport and Aircraft Noise are discussed in Section 3.2 of the Draft EIS. Also, as indicated in Section 2.4.4 of the Draft EIS, one element of the Proposed Project is to relocate the present helicopter operating apron east of the existing helicopter aprons as an interim solution to existing airfield safety questions and, in the long-term, to relocate the helicopter operations to an off-airport location once the parallel taxiway is constructed.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

WHALE RESTAURANTS
WHALE VILLAGE

April 23, 1996

Mr. David J. Welhouse
Federal Aviation Administration
Airports District Office
Post Office Box 50244
Honolulu, Hawaii 96850-0001

Dear Mr. Welhouse:

I received a copy of the Draft EIS for the proposed improvements to Kahului Airport on Maui. I wanted to register my support of the proposed projects as reviewed in the EIS.

As appropriately stated in the EIS, the runway extension has become both a symbol of undesirable growth and one of support for the many ailing industries on Maui. The debates that have occurred over the past years have done nothing to polarize the community. The issues surrounding the runway extension have only created further separation within the community. It is time that the community move forward, accept the results of the EIS and work together to resolve as best possible, the few remaining controversial issues.

The projects addressed by the EIS are needed for no other reason than to create a safe runway for both arriving and departing flights. The facts as presented in the EIS that support the need to widen and lengthen the runway to conform with current FAA standards and guidelines should be justification enough for this project. The alternatives to do nothing would mean that Maui would continue to provide an airport facility that is inadequate to ensure a safe air transportation system.


I feel that the economy and the employment on Maui will benefit by the expansion, both in the short and long term. The infrastructure work required will create new construction jobs and in the long term, we will see visitors who will fly direct to Maui. This visitor will stay longer than in previous visits and support the economy of Maui with their vacation activities, a benefit to everyone living on and visiting Maui.

An area I did not see in the EIS, was the potential benefits to the West Maui retail community. The growth of retailing on Maui over the past few years has been significant not only in the Kahului/Wailuku area, but also on the West side of Maui. The commitment by both local and national retailers to Maui has created jobs and has increased the tax revenues to the State. The retail industry on Maui shares with the visitor industry in leading the county in employment of local residence and tax generation. The runway extension will help support their commitment to our island.

Mr. David J. Welhouse
April 23, 1996
Page 2

To summarize, I support the extension projects and look forward to its approval and construction, as in the end the benefits to Maui County, its residence and visitors alike will be countless.

Very truly yours,
THE ESTATE OF JAMES CAMPBELL


Donald N. Reaser
Asset Manager, Maui

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DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
169 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAHULUI AIRPORT
IMPROVEMENTS
PROJECT
CAMPBELL ESTATE
LAHAINA, HAWAII

KAHULUI AIRPORT
AIR-EN
97-952

August 20, 1997

Mr. Donald N. Reaser
Asset Manager, Maui
The Estate of James Campbell
2435 Kaanapali Parkway, Building H-6
Lahaina, Hawaii 96761-1916

Dear Mr. Reaser:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comments in your letter of April 23, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. We appreciate your support and are continuing to move forward with the Proposed Project. Your letter and this response will be appended to the Final EIS for review by the decision makers.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 883-8821.

Very truly yours,

KAZU HAYASHIDA
Director of Transportation

c: Federal Aviation Administration (D. Welhouse)

4-17 11 2

Maui Electric Company, Inc. 200 West Maui Avenue, Suite 200, Maui, HI 96753



May 7, 1996

Mr. David J. Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850-0001

Dear Mr. Welhouse:

Subject: Kahului Airport Improvements
(TMK: 3-8-01 & 3-8-79)

Thank you for allowing us to comment on the subject project.

Maui Electric Company (MECO) at this time has no objections to the proposed project.

MECO encourages the project's consultant to meet with us as soon as practical so that we may plan for the project's short term and long term electrical requirements.

In regards to the transmitted report, MECO would like to offer the following comments:

1. Page 2-17, Paragraph 3, Line 2.
Delete "and one 4.16 kV, 3 phase line".
Although this 4.16 kV, 3 phase line is in the vicinity of the Kahului Airport, it no longer feeds the Kahului Airport. MECO proposes to use this line as an alternate feeder in the future.
2. Page 2-17, Paragraph 3, Line 4.
Replace "Kahului" with "Kanaha".
3. Page 2-17, Paragraph 4, Sentence 1.
The overhead lines have been replaced with underground cable.
4. Page 2-17, Paragraph 5, Sentence 2 and 3.
These facilities are fed off the same 12.47 kV overhead circuit that serves the helicopter facilities.
5. Page 2-42, Paragraph 4.
To determine if adequate facilities are available, MECO will require a detailed load (KW) estimate from the project's consultant.

An HEI Company

See Comment MECO-1

See Comment MECO-2

Mr. David J. Welhouse
May 7, 1996
Page 2

6. Page 2-42, Paragraph 6.
MECO also has 69 kV lines along certain portions of Hana Hwy.
7. Page 2-45, Table 2-3, "Airport Support and Infrastructure, Install underground communications and electrical utilities along Hana Highway".
To make an assessment of the \$1,400,000, MECO will require this cost to be itemized.
8. Page 3-115, Paragraph 3, Sentence 1.
Kahului Airport is connected to MECO's electrical power grid. Major sources providing electrical power to this grid are MECO's Kahului and Maalaea power plants and Hawaiian Commercial and Sugar's power plants.
9. Page 3-115, Paragraph 3, Line 3.
Delete "and one 4.16 kV 3 phase distribution line".
10. Page 3-115, Paragraph 4, Sentence 2.
The transformer that serves the airport area currently operates at about 50% of its rated capacity.
11. Page 3-116, Paragraph 1, Line 2.
Replace "730,000" with "867,000".
12. Page 3-116, Paragraph 2, Line 4.
Replace "kVA" with "kW".
13. Page 3-115, 3-116 and 3-117, 5-2 ENERGY ANALYSIS
To better assess the impacts due to this project, MECO will require a detailed load (KW) estimate from the project's consultant.

If you have any questions or concerns, please call Fred Oshiro at 872-3202.

Sincerely,

Edward Reinhardt

Edward Reinhardt
Manager, Engineering

FO:rt

See Comment MECO-6

See Comment MECO-7





STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

RECEIVED
DEPARTMENT OF TRANSPORTATION
1410 WILSON AVENUE
DRIAN K. MINAZI

RECEIVED
DEPARTMENT OF TRANSPORTATION
AIR-EN
97.905

August 20, 1997

Mr. Edward Reinhardt
Manager, Engineering
Maui Electric Company, Ltd.
210 West Kamehameha Avenue
Kahului, Hawaii 96732-0398

Dear Mr. Reinhardt:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 7, 1997 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MECO-1 - Coordination

Per your request, our electrical consultant will meet with Maui Electric Company, Ltd. engineers, as soon as we are in the design phases of the proposed project to plan for the project's short-term and long-term electrical needs.

COMMENT MECO-2 - Text Changes

The changes requested to the text of the Draft EIS will be incorporated into the Final EIS. (See attached "energy")

COMMENT MECO-3 - Adequacy of Facilities

As indicated above, our electrical consultant will meet with your engineers, as soon as we are in the design phases of the Proposed Project. As indicated in Section 3.1.8.2 of the Draft EIS, it is estimated at present, that the proposed Project will require approximately 16,000 KWH more than the present 867,000 KWH used

Mr. Edward Reinhardt

Page 2

August 20, 1997

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by the airport. Additional capacity at the Kanaha Substation No. 2 may be required to serve the Proposed Project.

COMMENT MECO-4 - Existing Electrical Lines

The information provided in your letter regarding underground lines will be included in the Final EIS. (See attached "energy")

COMMENT MECO-5 - Cost Estimates

The information requested will be provided at the time we enter the design phases of the Proposed Project.

COMMENT MECO-6 - Text Changes

The changes requested to the text of the Draft EIS will be incorporated into the Final EIS. (See attached "energy")

COMMENT MECO-7 - Load Estimate

The information requested will be provided at the time we enter the design phases of the Proposed Project.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1518

DEPARTMENT OF TRANSPORTATION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MAZU MATASACWA
REPUBLICAN CLIMATE
GILFILLAN (D) HAWAII
BRIAN K. MINAMI
MINISTRY OF
AIR-EN
97.1059

May 15, 1996

Hr. Owen Miyamoto
DOT Airports Division
400 Rogers Blvd. Ste. 700
Honolulu, HI. 96819-1880

Dear Hr. Miyamoto,

I am writing to express my sincere concerns about the proposed lengthening of the airport runway in Kahului, Maui. As a citizen of Maui for over 15 years I have watched the island grow through many changes. I understand that things are bound to grow and change, but we must carefully discern when those changes are positive and when they are not. The proposed expansion of the Kahului airport facility will undoubtedly bring changes to the island, many of which I believe we are not yet prepared to cope with. It is also quite likely that some of those changes will permanently damage the unique and precious lifestyle that we presently enjoy, which is also the lifestyle that attracts many of our tourists.

What concerns me most is the push for more when we aren't properly maintaining what we have. Infrastructure on the island is notoriously inadequate, miles of roads are in deplorable condition, landfills are stressed, and water is periodically rationed. What we need now is not 'more' but rather an improvement of the quality and functioning of what we already have. We don't need to 'create new jobs' as people can be put to work today improving and repairing what we have and bringing our lifestyle support systems up to a level that can cope with current demands. Once we're able to adequately maintain what we have, then we can look at some options for further growth.

I support the 'No-Action' alternative regarding runway lengthening and/or a parallel runway.

Thank you for your time and consideration.

Sincerely,

Susan Richardson

Susan Richardson
Star Route #181
Hana, Maui 96713

August 20, 1997

Ms. Susan Richardson
Star Route #181
Hana, Hawaii 96713

Dear Ms. Richardson:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 15, 1996 on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT SR-1 - Effect of Proposed Project on Maui's Infrastructure

The potential effects of the Proposed Project on Public Facilities, Infrastructure and Services, and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated in the Draft EIS, in general, the Proposed Project will have a beneficial effect on infrastructure components such as the road way system in and around the airport or not have an appreciable effect on infrastructure components, such as the electrical power generation, wastewater collection, treatment and disposal system, or potable water system of the island. As indicated in Section 2 of the Draft EIS, the Proposed Project is in response to existing and forecast increase in aircraft operations and passenger levels. These increases will occur regardless of the Proposed Project.

COMMENT SR-2 - Socio-Economic Effects of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in

itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport

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Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the State of Hawaii, Department of Transportation's (HDOT's) "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and

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8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT 8R-3 - Alternatives to Proposed Project

Various alternatives to the Proposed Project, including alternative airport sites, are discussed in Section 4 of the Draft EIS. As indicated in the Draft EIS, the present airport site has been in use as an airport for several decades. The development of another airport at another site would be prohibitive and relocate potential noise, traffic and other effects to another area of the island.

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

1379

BENJAMIN J. MIYAMOTO
DIRECTOR



KAZUHIYASHIMA
DIRECTOR
DEPUTY DIRECTOR
GLENN O. OHMOTO
Brian K. Minasi

MAY 3, 1996

David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

I read with great distress the news that the Environmental Impact Study for the expansion of the runway at the airport on Maui did not include effects of possible introduction of alien species.

We are all aware of the problem of the brown tree snake and how some of them have been found on flights into Honolulu International Airport. Why was this not considered in the Maui EIS? It only takes a few intruders slipping in when we are unaware to ruin the environment on the whole island. It may not happen in 5 - 10 years, but it will be a tragedy that will not go away easily.

Please reconsider the consequences of this deletion. Don't they make routine quarantine and inspection of international flights in Honolulu? They should be doing the same thing on the other islands receiving international flights also.

No one wants to stop expansion and bringing in international flights. They help all of us when they boost our local economy. Let's play it safe and make sure that boost doesn't ruin the main thing our islands have to offer - the natural beauty and the variety of natural wildlife.

Mahalo,

Denise Riegel
74-5062 Hualea Street
Kailua-Kona, HI 96740-1512

cc: Owen Miyamoto
Department of Transportation, Airports

Denise Riegel
74-5062 Hualea Street
Kailua-Kona, HI 96740

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Ms. Denise Riegel
74-5062 Hualea Street
Kailua-Kona, Hawaii 96740-1512

Dear Ms. Riegel:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 3, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DR-1 - Introduction of Alien Species (see attachment "mitigation measures")

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

see Comment DR-1

see Comment DR-1

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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

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regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

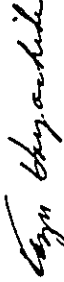
Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and COAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT DR-2 - Quarantine and Inspection Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Wehhouse)

Frederick W. Rohlfing, Esq.

Attorney at Law

RR # 1, P.O. Box 398
Kula, (Maui), Hawaii 96190

Telephone 808-878-6927
Fax 808-878-2159 EMail rohlfing@maui.net

May 10, 1996

Mr. David Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, Hawaii 96850

Mr. Owen Miyamoto
DOT Airports Division
Honolulu International Airport
400 Rodgers Blvd., Ste 700
Honolulu, Hawaii 96819-1880

Re: Kahului Airport Draft Environmental Impact Statement - Project No. AM1011-07
Comments and Recommendations of a Maui citizen

Gentlemen,

I wish to thank DOT Head Planning Engineer Schlapak for sending me a copy of Volume I of the Draft EIS for subject project. I have reviewed it and wish to comment thereon in general terms.

As Mr. Miyamoto will recall, I represented East Oahu districts in the House of Representatives and State Senate for a period in excess of 20 years between the first statehood election (1959) and 1984. I was born and reared on Oahu, but left that island in '84 for Maui and what I hoped would always remain a more rural lifestyle. Due to uncontrolled growth and a refusal by the State to assume mass transit responsibilities, Oahu had increasingly become a gigantic traffic hassle with which I could no longer deal. My wife, Patty and I arrived on Maui just in time to live through the construction boom of the middle and late '80's which brought at least a 30% population increase (and too many haoles) and most Oahu and Mainland-like urban social problems to Maui.

Why do I take the time to write about your plans to vastly expand Kahului Airport and with it change the way of life of the island of Maui forever? My friends say: "Waste time, it's a 'done deal'". My view on past political history of this State would confirm this view. But because I do care about my Hawaii-born children and grandchildren's future in Hawaii I feel have an obligation to put in my "two cents".

I strongly believe that the runway lengthening project (and without ANY doubt, construction of a new parallel runway) will mark the beginning of a new surge of tourist and resident population growth by reason of a major increase in international flights to Maui. (Far beyond today's limited Canadian flights) I'm also alarmed at the potential impacts on our National Park and upcountry farms from alien species that are certain to evade whatever inspection program is devised for an airport surrounded by open fields. I raise Monterey Pine Christmas trees on my 4 acres in Kula and already must deal with blight and a variety of pests-- we sure don't need any new pests. Arrival of the Brown Tree Snake from Guam or other Pacific areas would be an *ecummic disaster of incredible proportions*.

Your draft (Sections 6 and 8 of Vol. I) lightly passes over the consequences of internationalization although admitting "greater potential for growth inducing impacts from international non stop flights" and that Maui has a more "sensitive agricultural environment than Oahu". It seriously underestimates the actual impacts that will occur. We have, in recent days seen our Governor and congressional delegation go to bat for Japan Airlines' international flights to Kona. The Big Island sees the anticipated influx of tourists (estimates as high as 100,000) as their meal ticket to a revived economy. Now why would it have such a big impact on Hawaii but not Maui? Answer: It WILL have a similar impact on Maui.

Back in 1994 UH sociologist John Mascoka observed that the "airport is the hub of the wheel that drives the tourist economy". What that means is... *You build it -- they will come*-- but it won't be a "field of dreams" for the people who live on Maui, unless "nightmares" qualify. The failure of Hilo airport to attract more visitors is not relevant refutation of the fact that in Maui's case it WILL have that consequence. One only needs to compare factors outside the airport itself to conclude that comparing Hilo with Kahului is a case of "guavas as opposed to papayas".

Back in 1990, a group of over 250 Maui residents meeting over a period of two years issued their "Decisions Maui" report. Included was this paragraph:

"The unchecked growth of resident and visitor populations is the most pressing factor that directly affects any present and all future attempts at providing the adequate levels and types of human services needed to address the County's needs and expectations... such uncontrolled growth will frustrate any effort to improve the quality of individual and community life." (emphasis added)

Even more important than unwanted growth is the alien species issue. I am appalled that those in control of this DEIS excluded our National Park Service (NPS) and Haleakala National Park (HINP), in particular as a Cooperating Agency and failed to even consult with them. The draft EIS completely ignores potential impacts on HINP, which is a mere 1.5 miles from the airport site, and passes off the alien species issue as a statewide problem already being addressed by the state bureaucracy and through committees. Yet no inspection program in place today (or tomorrow) can provide assurance that

See Comment
Page 1, Para 2,
and Para 7

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international flights won't introduce new alien creatures into sensitive areas agricultural areas that surround Kahului Airport, unlike Honolulu. It seems as though we learn of a new iguana, snake, or other rare reptile surfacing every couple of weeks on Oahu. (And how many don't we hear about?) *Brown tree snakes have already been found on Oahu in urban areas around Honolulu International Airport. They won't be found as early on Maui.*

The exclusion of the NPS from the EIS process at minimum renders the DEIS *misplaced* and, at maximum exposes a deliberate bias toward the "politically-correct" *hulk-* *it- now* result favored by the visitor industry, the construction industry and the Hawaii State transportation bureaucracy.

The proposed re-routing and closure of roads in the Kahului Airport area as proposed in the DEIS deserves a brief comment. Today's system works. Why change it? Even if there is a runway extension only the circle runway road (Haleakala Hwy extension) needs adjustment. The DEIS road plan (for Pulehu, Hansen, Hana adjustment, "spine road", with introduction of a massive Honolulu-style cloverleaf) is another demonstration that State spending is out of control (in lieu of these unnecessary and expensive road projects maybe your engineers could squeeze in- instead- a few more traffic signal lights on the road fronting the terminal thereby giving contractors some less expensive makework.)

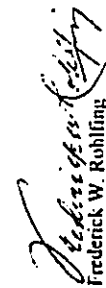
During the Watergate era Presidential Assistant H.R. Haldemann commented on the effect of the release of the Nixon tapes. His comment is appropos' with respect to subject Kahului Airport expansion plan and a resulting infestation by the brown tree snake and/or up to 100,000 new foreign tourists on Maui annually. Haldemann noted that:

"It's hard to get the toothpaste back into the tube."

Accordingly, I urge acceptance of the "No action" alternative regarding both the lengthening of the existing runway and also the parallel runway.

Thank you for the opportunity to comment on this critical issue for Maui's future.

Sincerely,



Frederick W. Rohlfing

cc: Governor Ben Cayetano, c/o OEQC
Brian Ishii, Edw. Noda & Assoc.
Hon. Dan K. Inouye, US Senator
Don Retser, Supt. HNP

BENJAMIN J. CAYETANO
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

HAWAIIAN AIRCRAFT
DIVISION

GENERAL MANAGERS
GEORGE OKAMOTO
DWAYNE K. HINMAN

MAILING LABEL TO
AIR-EN
97-1060

Mr. Frederick W. Rohlfing, Esq.
RR #1
P. O. Box 398
Kula, Hawaii 96790

Dear Mr. Rohlfing:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 10, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT FWR-1 - Purpose of Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. That is, the Proposed Project is in response to forecast increases in aviation activity and passenger levels. As will be noted below, rarely do major infrastructure projects create growth, they are constructed in response to growth. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT FWR-2 - Impact of Proposed Project on Haleakala National Park

The Hawaii Department of Transportation (HDOT), Airports Division, has been working in cooperation with the Department of

Interior National Park Service (NPS), as well as the Department of Interior Fish and Wildlife Service (FWS), other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the National Park Service and the FWS, the Federal Aviation Administration (FAA) and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

COMMENT FWR-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the

Mr. Frederick W. Rohlfing, Esq.
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the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport

Mr. Frederick W. Rohlfing, Esq.
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biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT FWR-4 - International Flight Operations

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT FWR-5 - Growth Inducing Effects of Proposed Project

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in

itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and

8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT FWR-6 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT FWR-7 - Airport Roadway Modifications

The impacts of a no-action scenario is described in Section 4.0. For surface transportation, the amount of congestion in the future without the Proposed Airport Access Road would be worse. In addition, the existing congestion during peak morning and afternoon traffic will be alleviated by the new roadway system. The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate

Mr. Frederick W. Rohlffing, Esq.
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August 20, 1997

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these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway.

The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

The final configuration of the airport roadway system, including the proposed airport access road/Hana highway intersection, are still in the planning and design stages of development. However, the description of the potential effects of the roadway system described in the Draft EIS represent a "worst case" scenario. Design and construction of the final roadway system will depend in part upon the availability of funding from federal and state sources.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



PROPOSED AIRPORT MASTER PLAN IMPROVEMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
KAHULULUI AIRPORT, KAHULULUI, MAUI, HAWAII
PUBLIC HEARING MAY 8, 1996

TESTIMONY BEFORE THE MAY 8, 1996 PUBLIC HEARING
ON THE
KAHULULUI AIRPORT MASTER PLAN EIS

Good evening. My name is Patrick J. Ryan, representing the Maui Chamber of Commerce and its 1300 members.

The Maui Chamber of Commerce supports the EIS for the Kahului Airport Master Plan as a necessary plan of interrelated projects for the future of Maui County. The preferred alternative recommended by the EIS (jointly developed by the US Department of Transportation (FAA & FHA) and the Hawaii DOT Airports Div.), is a mixture of infrastructure improvements representing a plan for the future. It deals with and seeks to provide necessary facilities and infrastructure for forecasted needs as well as correcting current deficiencies.

TESTIMONY OF

PATRICK J. RYAN

MAUI CHAMBER OF COMMERCE

Is the EIS thorough??? We counted thirteen sets of federal, state and county regulations to which the EIS has conformed. Ten alternative plans were investigated. Input was sought from very diverse groups - both in favor and opposed to changes. Who prepares EIS documents for various airport plans across the nation??? - the FAA. This is not a once every five to ten year endeavor, the FAA does this continually while conforming to constantly changing regulations.

MAUI CHAMBER OF COMMERCE

The Kahului Airport Master Plan does not pretend to solve all state and county problems. Nor does it pretend there will not be increased demand or increased problems without such improvements. Maui has already experienced increased demand and problems developing before good planning. Now is not the time to ignore reality. There will be additional growth in Maui as confirmed by separate independent studies as well as our own Visitors Bureau. The correct question is... "Will we be prepared this time?" or development without planning again.

See Comment PR-1

The Chamber is a member of and supports the Pueo group position in favor of the proposed Airport Master Plan improvements. We are pleased the Chamber participated with the Pueo group in the many scheduled discussions with those opposed to the airport changes. These meetings, facilitated by Councilman Sol Ka'hoo'alahala, sought to clarify situations and interpretations.

The Airport Master Plan EIS incorporates three phases and covers a time span from the present through the year 2016. Yes we must talk of and plan for years starting with 20—even though all our lives we have only used 19--.

See Comment PR-2

We are pleased the EIS addressed the potential parallel runway and the phase I improvements are able to defer the phase III third runway construction until about the year 2016. Correctly, a future EIS for the parallel runway will be developed as the needs dictate. The phase I proposed improvements address forecasted needs to the year 2002 as well as correcting present deficiencies.

The Maui Chamber supports necessary planned improvements that will be used to attract alternative industries. Maui can no longer only look to agriculture, tourism, tradition or other current interests. As much as we have fond memories of the past, that is exactly what it is, the past. In an environmentally sensitive manner, we must prepare and plan for the future, while preserving and understanding the past and cherished traditions. Our record of reacting as the

future becomes the present must be corrected. Alternative industries will enable Maui to more successfully counter single sector business cycle slumps and maintain funds necessary for county services. Maui is too dependent on visitors discretionary spending.

The well-planned airport improvements will enable Maui to market itself for these alternative industries. Not all modern business is done on a computer or over the "Net." The efficient movement of personnel, equipment and supplies is still a basic requirement that is carried out increasingly by air.

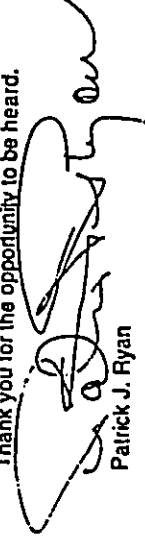
Hailing the invasion of alien species, which has effectively been ignored prior to the proposed airport improvements, must be aggressively addressed. It is a state as well as a county problem. Maui must take a firm and aggressive position. Our target should be Maui based inspectors for flights and other ports of entry, rather than Honolulu based inspectors. We need Maui based inspectors who care about Maui and see every day what they are protecting. We have an opportunity to protect Maui, not passively rely on others who are totally out of our control.

See Comment PR-3

In our world today we do not have a valid reason to avoid planning for the future.

Our goal is to protect our growing paradise from negative impacts as much as possible, through good planning such as the EIS is before us. The fulfillment of phase I of the Kahului Airport Master Plan will allow us to move in that direction.

Thank you for the opportunity to be heard.



Patrick J. Ryan

Maui Chamber of Commerce



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
859 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAHULUI AIRPORT
DEPARTMENT OF COMMERCE
CLARENCE EMERYO
BRIAN K. NIKARI

PERMIT/STAFF
AIR-EN
97-1234

August 20, 1997

Mr. Patrick J. Ryan
Maui Chamber of Commerce
250 Alamaha Street, Unit M16A
Kahului, Hawaii 96732

Dear Mr. Ryan:

Subject: Testimony on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your testimony of May 8, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your testimony, which is attached for reference.

COMMENT PJR-1 - Growth Inducing Impacts

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by

Mr. Patrick J. Ryan
Page 2
August 20, 1997

AIR-EN
97-1234

extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to

locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the State of Hawaii, Department of Transportation's (HDOT's) "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT PJR-2 - Project Phasing

The various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and long-term (Phase 3). The categorization of the projects is based on the existing and forecast demand. Obviously, the Phase 1 improvements are needed to meet existing demands and deficiencies, and the Phase 2 and Phase 3 projects to meet the aviation demands anticipated for that time frame. At this point in time, it is certain that the fuel pipeline may be a project beyond the Year 2010 planning horizon. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel

Tanks. As stated in Section 1.5.1, these long-range projects are analyzed in this Draft EIS to determine the individual and cumulative impacts as required by HRS Chapter 343 and NEPA.

However, given that the construction of these projects will occur, if at all, after the Year 2006, and, more likely near or after the Year 2016, the Draft EIS could provide an impact analysis for foreseeable impacts both individually and cumulatively. At this point in time, any more detailed analysis would be highly speculative and prone to error, for it is very likely that each of these long-term projects will undergo substantial changes over the next ten to fifteen years. For example, the scope, size, location and timing of the projects may be altered should air travel to and from Maui evolve and take shape differently than originally anticipated.

If and when the parallel runway, transient apron, helicopter facilities and fuel pipeline are defined in detail and submitted as projects to be implemented, each will be subjected to a more in-depth environmental review as required by state and federal law, e.g., Environmental Assessments, Findings Of No Significant Impacts (FONSI) or Environmental Impact Statements.

COMMENT PJR-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS) and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed

Mr. Patrick J. Ryan
Page 6
August 20, 1997

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and in the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

Mr. Patrick J. Ryan
Page 5
August 20, 1997

Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

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HAWAII AUDUBON SOCIETY 1088 BISHOP STREET SUITE 808 HONOLULU, HAWAII 96813

June 19, 1996

Department of Transportation, Airports Division
Honolulu International Airport
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819-1880

RECEIVED

JUN 24 1996

EDWARD K. NOUA & ASSOCIATES

Dear Sir/Madam,

I hope the following comments will prove instructive to the Kahului Airport Improvements Project. The Hawaii Audubon Society is a non-profit organization committed to the protection of Hawaii native wildlife and the ecosystems which support them.

Faunal Impacts at Kanaha Pond Wildlife Sanctuary

In regard to water bird impacts at Kanaha Pond Wildlife Sanctuary (KPWS) we urge the applicant to heed the recommendation of the consultant Dr. Phil Bruner, and conduct a nighttime overflight study of KPWS with large turbojet aircraft using runway 5-23 during the water bird breeding season in late April or early May. Concluding no significant impacts upon the endangered water birds at KPWS before such a study is completed is a hasty generalization at best. Potential impacts upon shorebirds preparing to migrate north in late April or early May also remain undetermined and we would similarly urge that the finding of no significant impact be reconsidered until such study is completed.

It has also come to our attention that the observational data which formed the basis for the finding of no significant impact during nighttime use of runway 5-23 by large turbojet aircraft has been questioned. We find the lingering uncertainty over whether Hawaiian Stilts or other endangered water birds were disturbed or not, further reason to conduct a breeding season observational study. Given the need to ensure maximum reproductive success of the endangered water birds at KPWS, such study would need to be severely limited in scope with overflights by turbojet aircraft using runway 5-23 halted if clear disturbances are noted.

If the approving authority determines that a study during the breeding season if not needed we would urge the applicant to at least err on the side of conservation and not allow large turbojet use of runway 5-23 during the Hawaiian Stilt breeding season. While this may result in construction delays, time is a luxury not affordable to our Hawaiian water birds given their low population levels.

Hazing Plan

The incomplete hazing plan for Kahului Airport is similarly of serious concern to the Hawaii Audubon Society. We hope that measures to mitigate ponding and to implement a completed hazing plan are carried out as soon as possible to avoid any further air strikes between silts and aircraft at the north end of runway 5-23. If prompt attention to this matter is unfeasible, we ask that the hazing plan is at least completed before a Final EIS for the project is issued. Toward this end, we support the immediate enhancement of newly acquired land for KPWS as alternative feeding areas.

Impacts of Alien Species

We underscore the concerns of others over the lack of mitigation measures directly offered by the project to combat the problem of alien species introductions. As a major part of entry for alien species, we hope that at least comparable measures are undertaken by Kahului Airport to efforts underway at Honolulu International Airport with regard to light traps and other monitoring methods. But to simply rely on existing alien species controls is to invite economic and ecological disaster to the island of Maui.

We hope you find the above comments useful and we thank you for this opportunity to participate in the planning process.

Daniel K. Sailer, Conservation Chair
Hawaii Audubon Society

cc: Office of Environmental Quality Control
Edward K. Noua and Associates, Inc.
Federal Aviation Administration

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STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5087

August 20, 1997

HAZUWASAKA
SECTION
GEMMAM OKAMOTO
BRIAN K. MINAMI

WILDLIFE DIVISION
AIR-EN
97-929

Mr. Daniel K. Sailer
Page 2
August 20, 1997

AIR-EN
97-929

COMMENT DKB-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the

Mr. Daniel K. Sailer
Conservation Chair
Hawaii Audubon Society
1088 Bishop Street, Suite 808
Honolulu, Hawaii 96813

Dear Mr. Sailer:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of June 19, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DKB-1 - Faunal Impact at Kanaha Pond Wildlife Sanctuary
Our consultants have completed a nighttime overflight study of Kanaha Pond Wildlife Sanctuary (KPWS). The results of that study, as indicated in the Draft EIS (see Section 3.11.2.2 and Appendix J), no correlation between the Hawaiian Stilt's responses and aircraft overflights.

As you are aware, generally birds become habituated to consistent external noises and disturbances and do not significantly alter their behavioral patterns. This, of course, is why there are Hawaiian Stilt involved with aircraft strikes on airports.

COMMENT DKB-2 - Hazing Plan

The U.S. Department of Agriculture (USDA), Animal Damage Control, is presently implementing the "Wildlife Management Plan" which includes the hazing at Kahului Airport. In addition, the USDA, Animal Damage Control, has completed an Environmental Assessment to allow for implementation of the plan.

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Mr. Daniel K. Sailer
Page 3
August 20, 1997

AIR-EN
97.929

Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

JUN 14 1996

DEPARTMENT OF TRANSPORTATION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5017

KAUAI/MAUI/STATE
DEPARTMENT OF
TRANSPORTATION
BRIAN K. MIHAHI

PHONE NUMBER
AIR-EN
97.1235

June 17, 1996

Mr. Dave Welhouse
Federal Aviation Administration
Honolulu International Airport
Honolulu, HI 96813

Dear Mr. Welhouse,

I am employed by a large hotel chain in Kaaunapali, Lahaina. Over the years, we have looked after thousands of guests who visit Maui. Tourism is very important to us with declining sugarcane and pineapple sales. Many of my neighbors and friends are either unemployed or are about to be unemployed. This has created major concerns in the society about one's ability to survive without a full time job. Most of us have mortgages to pay and would like to continue to do so.

Until we come up with other alternatives to sugarcane and the pineapple industry, I would like to recommend that we have a extended runway at the Kahului Airport. This way, we can accommodate direct flights of larger aircrafts into Maui. This will definitely create a demand for more hotel rooms, thus creating or maintaining hotel jobs. Please be proactive. This way, we can achieve our 'American Dream' of being employed and maintain our standards of living.

Let's not be like an ostrich -- bury our head in the sand pretending that tourism is not going to grow. One industry that is going to make strides in the world, is going to be tourism, so why not be ready for the next century!

With Best Regards,

Anil V. Sampat

Anil V. Sampat
113 Kama Street
Mailuku, HI 96793

AVS:dp

cc: Mr. Jerry Matsuda
Airport Director
State of Hawaii
Department of Transportation
Honolulu International Airport
Honolulu, HI 96813

August 20, 1997

Mr. Anil Sampat
113 Kama Street
Mailuku, HI. 96793

Dear Mr. Sampat:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your support in your letter of June 17, 1997 for the proposed Kahului Airport Improvements. Your comments will be made available to the decision makers prior to a final decision on the Proposed Project.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

cc: Federal Aviation Administration (D. Welhouse)

2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

10 MAY 1996
Steve Serlin
5537 E Monterosa St.
Phoenix, AZ 85018-4533

David Wellhouse
Federal Aviation Administration
Airports District Office
Box 88244 Honolulu, HI 96950

Mr. Wellhouse:

I'm a physician experienced in infectious diseases and the need to protect our bodies from infectious agents. My role as a physician is similar to your role as an individual responsible for making sure Haleakala National Park is protected from alien species or intrusions that could potentially devastate this international biosphere preserve. Expanding Kahului Airport without appropriately studying the environmental impact of expansion, without including the National Park Service in discussions of expansion, without adequately addressing the question of alien species, and without providing for adequate inspection and quarantine procedures is tantamount to administrative malpractice.

Please consider the entire scope of the problems that may arise from expansion. Airports can always be expanded; lost species can never be regained. The Park is one of the primary reasons tourists flock to Maui; be very cautious in preserving it.

Thank you for your attention

Steve Serlin M.D.

1509

DEPARTMENT OF TRANSPORTATION
OFFICE OF AIRPORTS



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
860 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Steve Serlin, M.D.
5537 E. Monterosa Street
Phoenix, Arizona 85018-4533

Dear Dr. Serlin:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 10, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT 88-1 - Effect of Project on Haleakala National Park

The State of Hawaii, Department of Transportation (HDOT), Airports Division, has been working in cooperation with the Department of Interior National Park Service (NPS), as well as the Department of Interior Fish and Wildlife Service (FWS), other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the Federal Aviation Administration (FAA) and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

KAUAI HAWAII
DIRECTOR
1401 KAPALAN
GLENN CAMPBELL
1010 K. MINNAI
WINTER HAWAII
AIR-EN
97.1112

COMMENT 88-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the HDOOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui, as well as in the rest of the State,

regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT 88-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, and has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOOT, Airports Division,

Steve Serlin, M.D.
Page 4
August 20, 1997

AIR-EN
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have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

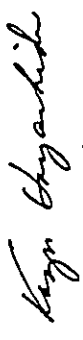
In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT 88-4 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DEPARTMENT OF TRANSPORTATION
UNITED STATES OF AMERICA

DEPARTMENT OF TRANSPORTATION
UNITED STATES OF AMERICA
BRIAN K. NIHAIA



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MINISTRY OF TRANSPORTATION
AIR-EN
97-1061

Annamarie Sheehan
105 Iolo Place
Kula, Maui, Hawaii 96790
Phone: (808) 878-2977 Fax: (808) 878-3360
e-mail: anna@maui.net

May 12, 1996

Federal Aviation Administration
Honolulu Airports District Office
Attn: David Welhouse
Box 50244
Honolulu, HI 96850

RE: Kahului Airport Expansion

Dear Sirs,

I attended the public hearing on Wednesday, May 8th at the Kahului Airport. I found this meeting very informative and must voice my opposition to the expansion and internationalization of Kahului Airport. I feel that the EIS does not address the alien species introduction and ecosystem impacts. With a document the length and size of that EIS, I don't understand how they could have overlooked this very important aspect. As a Maui resident who enjoys and respects Haleakala's uniqueness, I am very disappointed that you did not include Haleakala's staff and experts in this study.

Sincerely,

Annamarie Sheehan

Annamarie Sheehan

Ms. Annamarie Sheehan
105 Iolo Place
Kula, Hawaii 96790

Dear Ms. Sheehan:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 12, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT AB-1 - International Flight Operations

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

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On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 1.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been

to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT AB-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior, National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

Ms. Annamarie Sheehan
Page 4
August 20, 1997

AIR-EN
97.1061

discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT AB-3 - Impact on Ecosystems

The potential effects of the Proposed Project on biotic communities is discussed in Section 3.11 of the Draft EIS. In brief, the Proposed Project will result in the loss of Cane Field/Ruderal Border, Koa Haole/Mixed Understorey, and some Open Grassland vegetative zones. These vegetative zones are primarily habitat for introduced bird species. Similarly, the Proposed Project will affect feral mammals that inhabit the agricultural areas where the parallel runway will be constructed. The feral mammals are also introduced species.

The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will not directly impact the marine environment and there will be insignificant or no effects on water quality or runoff.

COMMENT AB-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Ms. Annamarie Sheehan
Page 5
August 20, 1997

AIR-EN
97.1061

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821. Very truly yours,



KAZU HAYASHIDA
Director of Transportation
Attachment: As noted above
c: Federal Aviation Administration (D. Welhouse)

MAY 24 1996

LEI HUAHUA CALENDAR
FROM PEARL



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

HAZUWASAKA
Director
DEPUTY DIRECTOR
GLENN DEMOTO
Dylan K. Mizell

WHERE REFERED TO
AIR-EN
97-996

August 20, 1997

May 18, 1996

Sirs,

At the May 14th, 1996 hearing on the Kahului Runway E.I.S., I presented material which should be included in the study.

1. Controlled atmospheric Containers data. Use of these containers could enable Hawaii's produce to be sent to distant markets by cheaper water transport rather than by air and with extended storage life.
2. Data on Boeing and other aircraft now being used; they can fly extended distances to Maui thus making a lengthened runway unnecessary.
3. The E.I.S. noise computer/modeled studies do not consider areas distant from the model/measured stations. There was no study of changing meteorological/weather conditions in long distance sound travel.

Sincerely,

Dr. Glenn Shepherd
477 S. Alu Rd.
Wailuku, HI. 96793

(Printed material is enclosed.)

Dr. Glenn L. Shepherd
477 S. Alu Road
Wailuku, Hawaii 96793

Dear Dr. Shepherd:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 18, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT GS-1 - Use of Controlled Atmospheric Containers

We suggest that you forward the controlled atmospheric container information to the airlines and shipping companies serving Maui. The State Department of Transportation, Airports Division, does not control the type of containers used on airlines, ships or by the agricultural producers.

COMMENT GS-2 - Types of Aircraft Using Kahului Airport

We agree that Boeing 777 type aircraft can presently fly into Kahului Airport as stated in Section 2.3.2 of the Draft EIS. In addition, any aircraft including the L1011, DC-10 and B-747 aircraft can fly into Kahului at present. However, none of these aircraft can takeoff fully loaded to overseas destinations due to the present length of the runway. To fly fully loaded to overseas destinations, these aircraft must stop in Honolulu prior to departing to the mainland U.S. or other overseas destinations. The analysis of the operating capabilities for the Boeing 777 and other aircraft is presented in Appendix N.

The proposed airport improvements will allow these aircraft to takeoff directly to the overseas destinations, thereby allowing

Dr. Glenn L. Shepherd
Page 2
August 20, 1997

AIR-EN
97.996

the airport and airline to operate more efficiently. As indicated in Section 2.3 of the Draft EIS, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT 08-3 - Noise Computer Modeling

The aircraft noise contours for Kahului Airport were developed using the FAA Integrated Noise Model Version 4.11. The model inputs include flight tracks, number of aircraft operations, and the time of aircraft operations. The contours are stated in terms of Yearly Averaged Day-Night Sound Level (DNL), which penalizes nighttime aircraft operations because of generally reduced ambient noise levels.

The methodologies and results of the noise studies conducted for the Proposed Project are included in Section 3.2 and Appendices C and O of the Draft EIS. As indicated, all of the noise studies were performed per accepted methods and procedures.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

MAY 24 1996

BENJAMIN J. CATELAND
GOVERNOR



KAJUHAKAOMPA
DIRECTOR
TRAVEL DEPT. HAWAII
1410 HANALEI DRIVE
HONOLULU, HAWAII 96813-5097

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 KUNIA DRIVE, STREET
HONOLULU, HAWAII 96813-5097

MARK W. BENTLEY
AIR-EN
97.1285

Federal Aviation Administration
Honolulu Airports District Office
Box 50244, Honolulu, Hawaii 96850
Attention: David J. Welhouse

May 22, 1996

Sirs,

Regarding the Environmental Impact Statement, dated March 1996

Traffic Volume Estimates in Volume One
Use of certain words are open to interpretation, and the overall intent is to offer reassurance to skeptical readers. For example: direct international flights would account for 6.4% of total number of passengers by year 2010; most of these flights would originate in Japan, that initially there would be only two or three flights per week; these passengers would be those presently flying with our interisland carriers. Finally, this paragraph concludes with: "the number of previously 'uncaptured' international visitors would be small."

How can the Dept. of Transportation defend such a project when from this report it doesn't appear to be cost-effective? This, at a time when state and federal finances are at an all-time low, due to unnecessary spending: The report seems to trivialize the impact of an international airport in this small space.

Many of us are deeply concerned with the threat of contagious diseases carried by international flights. (See Honolulu Advertiser, May 20'96) Has the Dept of Health been included in this E.I.S.?

A bigger airport will allow for more flights. How could the danger from more fuel storage be minimized?

Finally, if this report is correct that international flights will take away passengers from interisland carriers, then what will be the economic effect on those carriers?

Overall, the E.I.S. fails to make a convincing case that Maui should go big-time with an international airport.

Aloha,

Shirley Shepherd
477 S. Alu Rd
Wailuku, HI
96793

Ms. Shirley Shepherd
477 S. Alu Road
Wailuku, Hawaii 96793

Dear Ms. Shepherd:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 24, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT 88-1 - Traffic Volume Estimates

The use of certain words were used to convey in an objective and technical manner the potential environmental impacts of the Proposed Project and its alternatives. It was not the intent to confuse the reader.

In regards to the number of international passengers, as stated in Section 6.0 and discussed in detail and Appendix E of the Draft EIS, "Japanese tourism still represents a fairly small, if growing, part of Maui's visitor industry, and virtually all industry experts who were interviewed for the report concluded that initial consequences would be limited to a few flights a week, and these might just be serving the current market." In addition, in Section 8 it further explains that: "These flights would primarily transport passengers who presently use the interisland airlines to reach Maui..." Therefore, the number of previously "uncaptured" international visitors would be small as the existing Japanese visitor market to Maui can sustain a few flights a week, as the Japanese visitors are presently arriving on Maui through interisland flights.

Ms. Shirley Shepherd
Page 2
August 20, 1997

AIR-EN
97.1285

COMMENT 88-2 - Funding Types of Aircraft Using Kahului Airport
The EIS is an informational document which presents the environmental impacts of the Proposed Project and its alternatives. The EIS is provided to the decision makers prior to a final decision on the Proposed Project.

The proposed airport improvements will allow these aircraft to takeoff directly to the overseas destinations, thereby allowing the airport and airline to operate more efficiently. As indicated in Section 2.3 of the Draft EIS, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

Furthermore, the funding for the airport projects will use funds derived from airport revenues, and no general fund money will be used. These airport (aviation) funds can only be used on airport related projects.

COMMENT 88-3 - Department of Health

The Department of Health did have the opportunity to comment on the Proposed Project during the Scoping and Draft EIS review periods.

COMMENT 88-4 - Airport fuel

The "danger" from fuel storage is covered in Section 3.4 of the Draft EIS. The "danger" will be mitigated using proper design in accordance to the applicable rules and regulations.

COMMENT 88-5 - Interisland Flights

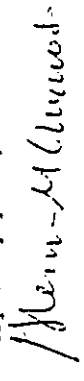
The impact on the interisland flights are covered in Section 3.5, 4.0 and Appendix E of the Draft EIS. An insignificant impact on the interisland airlines is expected.

Ms. Shirley Shepherd
Page 3
August 20, 1997

AIR-EN
97.1285

We disagree, that the intent of the project is to create a "big time" international airport, but your comments will be made available to the decision makers prior to a final decision on the Proposed project. Please refer to response Comment 88-2 above.
If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,


KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DEPARTMENT OF TRANSPORTATION
HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
859 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAHUHAUWA
DIRECTOR
IDENTIFICATION
OFFICE
BRIAN K. MIRAMI

WHERRY REEVE
AIR-ER
97.1236

August 20, 1997

417 Liholiho St.
Maui, HI. 96793
June 15, 1996

Mr. David Wellhouse
F.A.A. Airport District Office
Box 50244, Honolulu HI. 96850-0001

Dear Mr. Wellhouse,
I am against expansion of the Maui Airport.

Reasons: Quality of life on Maui is about to be overtaxed. With quality comes a little difficulty that slows one down to appreciate the visit. Greater chance of more pests, bugs, insects bad vegetation brought in. (honor system doesn't work) Safety It is safe now without more flights and people.

There is a movement of greed to get as much \$\$ that can be made, to the detriment of the residents that have lived here and paid their property taxes.

I was born on Maui and that thing called aloha spirit that tourists come to partake of, will no longer be there. It is something that is given freely and dollars cannot buy it.

Lets treat people well and they will be back. Mass produce them through, crime will go up and people won't come back..

Don't trade quality for quantity..

Sincerely,
Barbara Sinclair
Barbara Sinclair

See Comment pg 1
See Comment pg 2
See Comment pg 3
See Comment pg 4
See Comment pg 5

Ms. Barbara Sinclair
417 Liholiho Street
Maui, Hawaii 96793

Dear Ms. Sinclair:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of June 15, 1996 on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT BB-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

COMMENT BB-2 - Safety

The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix N ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current FAA standards; (ii) eliminating the trees which penetrate the approach surface to Runway 20; (iii) lengthening the runway for landings and aborted takeoffs; (iv) enlarging and relocating the displaced landing threshold for Runway 2; and (v) relocating the helicopter operations to a site further away from Runway 2-20.

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights, reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing the amount of time aircraft spend circling the Airport, which, in turn, decreases that number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

COMMENT BB-3 - Growth Inducing Impacts

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12.

the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport

itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against the growth forecast in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and

DOCUMENT CAPTURED AS RECEIVED

MAY 21 1998



DEPARTMENT OF TRANSPORTATION



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAJUIA YAKA
REPRESENTATIVE
CLEMENS OSMAR
BRIAN K. MINA
AIR-EN
97.962

August 20, 1997

Ms. Marilyn Smith
P. O. Box 1078
Paia, Hawaii 96779

Dear Ms. Smith:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 18, 1996 on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MS-1 - Impact of Proposed Project on Public Recreation Facilities

The potential effect of the Proposed Project on public recreation facilities is discussed in Section 3.22.7 of the Draft EIS. As indicated in the Draft EIS, the Proposed Project is expected to allow increased numbers of visitors and residents to visit/return to the airport area recreational facilities, which consist primarily of County beach parks, more efficiently. As part of the Proposed Project, Kanaha Beach Park will be expanded by the State of Hawaii Department of Transportation. The Proposed Project will not affect State parks in the vicinity of the airport.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

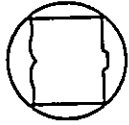
Attachment: As noted above

cc: Federal Aviation Administration (D. Welhouse)

*Kind of feedback
of the airport
has not support in expansion
See Comment MS-1*

Response sent to...

MAY 21 1996



May 20, 1996

David J. Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850-0001

Re: Kahului Airport Improvements Draft
Environmental Impact Statement

Dear Mr. Welhouse:

The Draft Environmental Impact Statement (EIS) for Kahului Airport Improvements fails to reasonably satisfy the requirements for planning and disclosure established by state and federal law.

I have not read every word in the weighty multi-volume document. In EIS cases, however, weight and volume do not equate to substance. My review of the draft EIS has been sufficient to describe some obvious deficiencies.

The purpose of the Kahului airport improvements is to facilitate travel to and from Maui.

While the draft EIS joins in the chorus that argues Maui tourists do not come to see the airport (an argument that has become a standard among tourist industry advocates of airport expansion) that is a frivolous position in view of the intent of tourism advocates and State officials.

Two aspects of a longer runway undeniably facilitate travel to and from Maui: (1) it makes round-trip flights for commercial airlines more viable economically and (2) it thereby increases the potential for scheduled commercial international and domestic direct flights to Maui.

Most aircraft can presently land at Kahului, just as they can at LaGuardia, because landing on a 7000 foot runway is not so

William D. Smith

P. O. Box 927
Wailuku, Maui
Hawaii 96793

808-878-6776

David J. Welhouse
Federal Aviation Administration
Airports District Office
Re: Kahului Airport Draft
Environmental Impact Statement
May 20, 1996
Page 2

difficult. Heavier fueling requirements for roundtrip flights now defeat taking off from the 7000 foot runway, inhibiting the potential for scheduled direct commercial flights.

In the present situation, commercial flights from the mainland (beyond California) and international flights usually disgorge their contents in Honolulu, and the travellers then fly to Maui on local interisland flights.

That commercial airlines do not now see economic benefits in scheduling direct flights to Maui has helpful aspects. First, it inhibits travel to and from Maui. Second, it inhibits the introduction of alien pests and disease.

No one, to my knowledge, has yet argued in favor of the introduction of alien pests and disease to Maui.

Many people, however, have argued in favor of the Kahului airport improvements as a means to facilitate travel to and from Maui. The latter argument often expresses the expectation that facilitated travel will result in more tourists, both domestic and international, as the scheduling of more commercial flights becomes economically attractive to airlines.

Many people argue against the Kahului airport improvements that would facilitate travel to and from Maui because they do not want more scheduled commercial flights, especially international flights. Bringing more tourists to Maui is not the best use of our resources. The increased introduction of alien pests and disease that would result from direct domestic and international flights is something that must be avoided.

My biggest problem with the draft EIS is that it has been artfully crafted to avoid directly addressing these issues of bringing more tourists to Maui and increasing the introduction of alien pests and disease as a result of more direct international and domestic flights to Maui. Why is that? Why not recognize and deal with the most obvious issues?

Your dismissive attitude toward the staff at Haleakala National Park is particularly offensive. Park staff possess expertise that is essential to competently address the risks associated with the introduction of alien pests and disease.



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
480 KUNCHIKOHI STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

David J. Welhouse
Federal Aviation Administration
Airports District Office
Re: Kahului Airport Draft
Environmental Impact Statement
May 20, 1996
Page 3

Your approach gives the impression that you want to avoid the issue and sidestep the expertise necessary to deal with it.

Please recognize these facts: (1) now, because most flights originating outside of Hawaii that bring people and things to Maui stop in Honolulu, there is a buffer between Maui and the direct introduction of alien pests and disease: those people and things have to get off of the originating aircraft and then onto an interisland flight to get to Maui. (2) That present transition step helps mitigate Maui's exposure to introduction of alien pests and disease by placing a buffer zone (i.e., Honolulu) between this island and the rest of the world. (3) Your proposal to increase the runway size will both decrease the present need for flights to stop in Honolulu and decrease use of interisland flights to complete travel to Maui, thereby removing an existing mitigation means of buffer zone with regard to Maui's exposure to introduction of alien pests and disease.

Your analysis of the proposed improvements cannot simply say no problem to the removal of an existing mitigation measure. This is not a neutral or status quo situation -- your proposal is adverse to Maui's present environmental situation because it will eliminate an essential buffer zone that now exists. The EIS must address and resolve that planned adverse change.

Proposed airport improvements are not necessary to accommodate actual travel activity and the improvements would have serious, substantial and irreparable adverse impacts (such as the introduction of alien pests and disease and the creation of undue stress upon Maui's overburdened infrastructure.)

Needed improvements in schools, hospital facilities, affordable housing, roads, sewage, water, solid waste and the cleaning up of ocean pollution provide plenty of opportunities to more wisely spend money and create jobs here.

Aloha,

Bill Smith
Bill Smith
P.O. Box 927
Wailuku, HI 96793

Mr. William D. Smith
P. O. Box 927
Wailuku, Hawaii 96793

Dear Mr. Smith:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT WDB-1 - Purpose and Need for the Proposed Project

The purposes and need for the Proposed Project are described in Section 2.3 of the Draft EIS. As indicated, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT WDB-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and

Mr. William D. Smith
Page 3
August 20, 1997

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the FWS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT WDS-3 - Forecast Aircraft Operations and Passenger Levels

The Proposed Project is based on the forecast aircraft operations and passenger levels and the need to provide an airport infrastructure which will support the present and future goals and objectives of the County and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands. The forecast aircraft operations and passenger levels will occur regardless of the Proposed Project. That is, the Proposed Project is in response to the forecasts.

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport

Mr. William D. Smith
Page 2
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private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.2.5.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

Mr. William D. Smith
Page 7
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reviewed the Draft EIS. The FAA and HDOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT WDS-6 - Interisland versus Direct Flights to Maui

While Honolulu International Airport (HIA) now acts as a partial buffer to the inadvertent introduction of alien species to Maui, the lack of complete agricultural inspection services of interisland flights at HIA makes this one of the weak links in the battle against the introduction of alien species to all islands. Direct flights from the mainland U.S. and other overseas airports, along with the improvements to the federal and State inspection services that are being planned as part of the Proposed Project, will help alleviate part of alien species introduction issue. The new services planned for a new air cargo facility, which the HDOT, Airports Division, is committed to, will include all of the equipment and facilities required by the federal and State agricultural inspectors to perform their duties more efficiently. Additionally, HDOT, Airports Division, is committed to providing the funding for increased State agricultural inspectors, which will further aid in the pursuit of their duties. All of these elements of the Proposed Project will benefit the residents of and visitors to Maui.

COMMENT WDS-7 - Effect of Proposed Project on Maui's Infrastructure

The potential effects of the Proposed Project on the airport area infrastructure are discussed in detail in Section 3.22 of the Draft EIS. Additionally, a detailed analysis of the infrastructure requirements for Kahului Airport is presented in Appendix L to the Draft EIS. A traffic impact report is presented in Appendix M and P, and an aviation safety analysis is presented in Appendix N.

In general, based on the various analyses performed, the Proposed Project will have positive, insignificant or negligible effects

Mr. William D. Smith
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August 20, 1997

COMMENT WDS-4 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT WDS-5 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, and has provided information for the preparation of the EIS, and has

Mr. William D. Smith
Page 8
August 20, 1997

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on the water and wastewater systems, telecommunications systems, police, fire and security services, health care services, schools, and recreational facilities of the island. Similarly, for the most part, the proposed roadway improvements will result in positive effects on the roadway system in the vicinity of the airport. There will be significant traffic effects at some intersections, but these effects will occur with or without the Proposed Project as a result of natural growth of the island.

The funds used to develop State airports are derived from landing fees, bond issues and the U.S. Airport and Airway Development Act. They are not derived from the State's general fund or other sources. Therefore, these funds can only be used for airport purposes. The HDOT may request the use of Intermodal Surface Transportation Efficiency Act funds for the construction of the Airport Access Roadway, through the Federal Highway Administration.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

KAZUHIKO
DEPARTMENT
GUYANA
BRIAN K. MINAMI

WINNYBERTO
AIR-EN
97.1132



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5097

August 20, 1997

BRUNDAJ CALILANO
CONTRACTOR

3847 Cardiff Court
Loveland, CO 80538-2079
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e-mail: eestms@frii.com
4 May 1996

Mr. Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd., #700
Honolulu, HI 96819

Dear Mr. Miyamoto:

I have just learned of the proposal to expand Kahului Airport, and I wish to write opposing the plan because EIS does not provide adequate protection of the native, endangered species. It fails to address the issue of preventing the introduction of non-native species. The EIS plan does not provide effective inspection and quarantine procedures for the airport, and if international flights are permitted without these effective safeguards the risks become incalculable and the consequences irreparable.

I am appalled that the FAA and the Hawaii Department of Transportation, the joint authors of the EIS, excluded the National Park Service from the discussions and decisions that were made. After all, the National Park Service is the appointed steward of the land and the resources of Haleakala. The input of the NPS is absolutely indispensable in such issues.

It seems to me that THE issue that has dominated the EIS is narrowly focused on commerce and profit; and what is the profit if the unique resources of Haleakala are destroyed?

Most cordially,
Earl E. Stevens
Earl E. Stevens

Mr. Earl E. Stevens
3847 Cardiff Court
Loveland, Colorado 80538-2079

Dear Mr. Stevens:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 4, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT EES-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior Fish and National Park Service (NPS), Department of Interior Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

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and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT EEB-2 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

COMMENT EEB-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment

AIR-EN
97.1132

Mr. Earl E. Stevens
Page 4
August 20, 1997

Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

COMMENT EEB-4 - Impact of Proposed Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with the NPS, as well as the FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

We should also add that the NPS has been an active participant in the review of the Draft EIS and their expertise was sought in the development of the information provided in the Draft EIS regarding the alien species issue. We, too, value the National Park Service's expertise on ecosystem issues, which is why they have been an active participant in the preparation and review of the Draft EIS.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

CITIZENS AGAINST NOISE

Oahu: P.O. Box 27705 Honolulu, Hawaii 96827
Big Isle: P.O. Box 364 Volcano, Hawaii 96785
Maui: 2695 Lia Place Haiku, Hawaii 96708
Kauai: P.O. Box 698 Kilauea, Hawaii 96754
Ph: (808) 985-8861 - FAX: (808) 985-8893

TO: Mr. Jerry M. Matsuda
Airports Administrator
State Dept. of Transportation
Honolulu International Airport

FROM: Barry Stokes, President
Citizens Against Noise
Post Office Box 364
Volcano, Hawaii 96785

DATE: May 23, 1996

VIA: U.S. Mail

Re: International Flights at Kahului Airport - Runway Extension

Dear Administrator Matsuda:

Many thanks for your input in the recent Big Island meeting of the State's Aviation Noise Sound Abatement Program. We look forward to developing a consensual resolution to the noise and safety issues generated by the growth of the air-tour industry statewide.

We write today about our concerns for Haleakala National Park. Although tour helicopter overflights continue over the crater and wilderness sections of the Park, this letter concerns the expansion of Maui's Kahului Airport to international arrivals, fifteen miles from the National Park boundary.

Haleakala is recognized as an International Biosphere Reserve; it holds more endangered species than any other site in the National Park System. It also serves as host to more than 1.6 million human visitors a year, and several more non-human, which are indeed far more dangerous.

STATE DEPT. OF TRANSPORTATION
KAHULUI RUNWAY EXTENSION
MAY 23, 1996
PAGE TWO

Alien species in Hawaii pose a threat to Hawaii's fragile ecosystem. Despite a long-established screening and quarantine process designed to detect their presence, dozens of non-native species arrive in Hawaii every year - often carried on international air connections through Honolulu International Airport. If alien species are not controlled, Hawaii could become the next Guam, where an extraordinarily effective predator, the brown tree snake, has wiped out nearly every native bird species.

Nothing can guarantee that exotic species won't be introduced into Haleakala, but if international flights land at Maui's Kahului airport as currently planned, the chances for a biological catastrophe will be greater. The airport is only 15 miles from the park, and much of the area in between is fertile agricultural land planted in sugar cane, unlike the inhospitable environment around Honolulu International. On top of that, Haleakala has an unusual variety of habitats, at altitudes from sea level to 10,000 feet, ideal for a wide variety of invading species to become established.

A recently-completed environmental impact statement ("EIS") fails to adequately address the question of alien species; in fact it virtually ignores the issue. The FAA itself has already indicated its belief that airport expansion would pose no threat to endangered species. Your own State Department of Transportation has excluded the National Park Service from discussions on the issue. The National Park Service is steward of the land and resources at Haleakala; its absence from the process makes the conclusions of the EIS suspect, at best. We urge the DOT and FAA to consider these alien species impacts in a new EIS. Sincerely,


J.B. Stokes, President
CITIZENS AGAINST NOISE

cc: Governor Benjamin J. Cayetano
Transportation Director Kazu Hayashida
Sierra Club Legal Defense Fund, Inc.
Hawaii's Congressional Delegation
National Parks Conservation Association



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 KUNCHIKOWIL STREET
HONOLULU, HAWAII 96813-5097

KANUWAKOBA
Insulin
DEPARTMENT OF
CITIZENS AGAINST NOISE
BRYAN K. MINKAI

WINYHIFERTD
AIR-EN
97-927

Mr. Barry Stokes
Page 2
August 20, 1997

AIR-EN
97-927

August 20, 1997

Mr. Barry Stokes
Citizens Against Noise
P. O. Box 364
Volcano, Hawaii 96785

Dear Mr. Stokes:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 23, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT BB-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in

time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT BB-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

Mr. Barry Stokes
Page 4
August 20, 1997

biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT BB-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Walhouse)

Mr. Barry Stokes
Page 3
August 20, 1997

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the

1556

May 18, 1991

David Welhouse, FAA
 Box 50244
 Honolulu, HI 96850

RE: MAUI AIRPORT EXPANSION ISSUE

This issue affects me and many others very deeply. I come from an old Raraiawa family

I am appalled at the County's insensitivity to their local citizens. They are more concerned with tourists than about the welfare of their own. Let's STOP THIS RUNAWAY MADNESS! Maui will never be the same if this longer runway expansion passes. There will be bigger aircraft (what for?), more visitors, more rental cars clogging our highways, hence a slower more dangerous commute to work and more accidents - patients that our hospital will have no beds for. It's filled to capacity as it is.

Let the 747's land on Oahu and visitors take inter-island flights. This, in turn, will keep Aloha, Hawaiian & Mokulele in business with larger revenue. Think about it PLEASE. Look what happened with the Hilo Airport.

See Comment HS-1, HS-2, and HS-3

See Comment HS-4

21

See Comment HS-5

In addition, alien pests will be a grave threat for native plants and birds here. STOP! Before it's too late and we lose our unique ecology. PLEASE! We have plenty enough tourists as it is and certainly enough concrete already. Soon the green sugar cane will be gone with development. Isn't that enough?!?! Don't degrade Maui any longer. Just to please ^{greedy} amateur politicians (many who get paid under the table).

See Comment HS-1

We would want to continue to visit Maui when it is no longer paradise, but a bunch of high rises and cement. And, this will happen. The expansion will have the reverse effect on tourism. Why come here when they can go to quaint islands in the Pacific that are not commercialized as we have become. It is no longer a peaceful place to live and it saddens me very much.

See Comment HS-6

PLEASE help us who live here. The \$8 millions of state money we could use for better roads, water, etc. That would help the locals. Let's not let tourists decide how we should live and



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Let's not let tourism spoil our beautiful island even more.
I will grieve if this project passes and I will no longer have respect for our State and will move to the mainland.

ENOUGH is ENOUGH!!

I am also a private pilot that flies out of Kahului on occasion.

Thank you for listening to me, only one of many opponents that found time to write.

Sincerely,
Marjory Stone
80 Haahao Place
Pukalani, Maui 96768

A Maui County and
State Taxpayer

cc: Owen Meyers
DOT

DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAHULUI AIRPORT
STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
KATHLEEN CHAMBERS
KATHLEEN K. MINAMI

MAIL ROOM
AIR-EN
97-1051

August 20, 1997

Ms. Marjory Stone
80 Haahao Place
Pukalani, Hawaii 96768

Dear Ms. Stone:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 18, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MB-1 - PURPOSE OF PROPOSED PROJECT

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the Islands.

COMMENT MB-2 - Effect of Proposed Project on Traffic

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key

intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

COMMENT MB-3 - Effects of Proposed Project on Maui's Infrastructure and Public Facilities

The potential effects of the Proposed Project on Public Facilities, Infrastructure and Services, and Aviation Safety are discussed in Section 3.22 of the Draft EIS. As indicated in the Draft EIS, in general, the Proposed Project will have a beneficial effect on infrastructure components such as the roadway system in and around the airport or not have an appreciable effect on infrastructure components, such as the electrical power generation, wastewater collection, treatment and disposal system, or potable water system of the island. As indicated in Section 2 of the Draft EIS, the Proposed Project is in response to existing and forecast increase in aircraft operations and passenger levels. These increases will occur regardless of the Proposed Project.

The subject of Maul Memorial Hospital capacity has been and continues to be discussed by the State Administration and Legislature. It is recognized that improvements to the hospital are required. However, given present budget constraints, these improvements are not possible at this time.

COMMENT MB-4 - Alternatives to the Proposed Project

Various alternatives to the Proposed Project, including alternative airport sites and the alternative of No-Action, are discussed in Section 4 of the Draft EIS. As indicated in the Draft EIS, the forecast increases in aircraft operations and passenger levels are expected to occur regardless of the Proposed Project. Also, as indicated in the Draft EIS, airport operations would continue to be inefficient and costly to all of us.

COMMENT MB-5 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the

Ms. Marjory Stone
Page 4
August 20, 1997

AIR-EN
97.1051

Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT MB-6 - Project Funding

The funding for the Proposed Project is discussed in Section 2.5 of the Draft EIS. Monies used for the preparation of the Draft EIS were through the Federal Airport and Airways Development Act and the State's Airport Special Fund. These funds were generated from fees on airline tickets, commercial aircraft landing at the State's airports, airport concessionaires rents, and other aviation user fees. Therefore, no money from

Ms. Marjory Stone
Page 5
August 20, 1997

AIR-EN
97.1051

the State's General Funds were used in the preparation of the EIS. By law, these airport funds can only be used for airport related activities.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

DR. HAWAIIAN CIVIL SERVICE
1001 BENTLEY



KAHULUI AIRPORT
DEPARTMENT OF TRANSPORTATION
CLEMENS CHAMBERS
BRIAN K. MUIRAI

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

KAHULUI AIRPORT
AIR-EN
97-1063

August 20, 1997

1496
Adele H. Sumida
116 Lanipaa Way
Kula, HI 96790

May 16, 1996

Mr. David Welhouse
U.S. Dept. of Transportation
Federal Aviation Administration
Honolulu, Airports District Office
Honolulu, HI 96850

Mr. Kazu Hayashida
State of Hawaii - Dept. of Transportation
Airports Division
400 Rodgers Blvd. Suite #700
Honolulu, HI 96819

Dear Mr. Welhouse and Mr. Hayashida:

I am writing to let you know that I whole-heartedly support the lengthening of the Kahului Airport runway. I have spoken with several friends and family members who also support the runway extension. In fact I do not personally know even one person who does not support the runway extension. To me, it is very clear that a vocal minority is preventing this very necessary improvement to the Kahului Airport.

My primary concern is the safety of the existing runway. The inadequacy of the runway length is always on my mind when I am in a plane landing at Kahului Airport. Please don't let this be one of those things where no action is taken until a bad accident occurs.

Another major concern to me is the economic condition of Maui. Even though we may not see any positive economic results from extending the runway until the year 2010, we need to take advantage of this opportunity to enhance the future of Maui's economy. The year 2010 is only 14 years away. To me that doesn't seem very far away. That is about the year that my son, who is now 7 years old, will be getting out of college and having to make the decision of whether or not to come back home to live on Maui.

I was born and raised on Maui. I went high school in Honolulu and to college on the mainland. I was able to come back to live on Maui because there were jobs available. It will be an extremely sad day if my son has to say to me, "Mom, I can't come back to live on Maui because there are no jobs!"

Thank you for your time and consideration.

Sincerely,

Adele H. Sumida

Ms. Adele H. Sumida
116 Lanipaa Way
Kula, Hawaii 96790

Dear Ms. Sumida:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your support and comment letter of May 16, 1996 on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference. Please be assured that we are moving forward as fast as we can while adhering to the processes and procedures necessary for a project such as the Kahului Airport improvements.

COMMENT AHS-1 - Aviation Safety

The impacts on aviation safety for the Proposed Project is discussed in Section 3.22.9 and for the No-action alternative in Section 4.2 of the Draft EIS.

COMMENT AHS-2 - Socio-economic and Growth Inducing Factors

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth

See Comment #51
See Comment #52

the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to

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DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII 96813 5007



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
859 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5007

KAUAIKAWA
REPUBLIC OF HAWAII
GENERAL COUNCIL
WILLIAM K. HIRATA

KAUAIKAWA
REPUBLIC OF HAWAII
GENERAL COUNCIL
WILLIAM K. HIRATA

20 May 1996

Mr. David J. Welhouse
FAA, Airports District Office
P.O. Box 50244
Honolulu, HI, 96850-0001
Dear Sir:

I want to go on record as being very much in favor of the proposed Kahului Airport Runway lengthening. I, for one at least, am sick and tired of being held hostage by the so called environmentalists. They talk a lot but do very little to improve the world. I am particularly opposed to people like Mr. Don Reeser, Haleakala National Park Superintendent, statements concerning the Environmental Impact Statement. He is a Federal Employee, living on Maui only because he is paid to, and has no business getting involved in local issues. If he wants to protect Haleakala why doesn't he do something about the Hogs, Goats, Deer, Mongoose, Feral Cats, and Wild Dogs that run rampant all over the island.

At any rate in the interest of Safety and economics I am very much concerned about the short runway at Kahului. Everytime I take off, or land, there I pray that the flight won't be aborted or can stop in time. Also, I am tired of having to pay the extra fare involved with inter-island flights when making trips to the mainland.

It seems to me that since most of the working people living on Maui depend on Tourism for their living they would want bigger, and better, Jets landing here. I certainly do!

In the past year, in order to improve the Wildlife Habitat, I planted 1,150 trees and shrubs on my 700 acre Utah property. As individuals what did the local environmentalists do in the past year?

Respectfully,
William R. Syfers
William R. Syfers
340 Liliuokalani St.
Pukalani, HI, 96768
(808) 572-6057

Copy to
Mr. David J. Welhouse
FAA, Airports District Office
P.O. Box 50244
Honolulu, HI, 96850-0001

Mr. William R. Syfers
340 Liliuokalani Street
Pukalani, Hawaii 96768

Dear Mr. Syfers:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your support and comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport improvements. This letter is in response to your comments, which are attached for reference.

COMMENT WRB-1 - Impact of Proposed Project on Haleakala National Park

The State of Hawaii, Department of Transportation (HDOT), Airports Division, has been working in cooperation with the Department of Interior National Park Service (NPS), as well as the Department of Interior Fish and Wildlife Service (FWS), other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the Federal Aviation Administration (FAA) and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been

and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

We should also add that the NPS has been an active participant in the review of the Draft EIS and their expertise was sought in the development of the information provided in the Draft EIS regarding the alien species issue. We, too, value the NPS's expertise on ecosystem issues, which is why they have been an active participant in the preparation and review of the Draft EIS.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

COMMENT WRB-2 - Safety
The impacts on aviation safety for the Proposed Project is discussed in Section 3.22.9 and for the No-Action Alternative in Section 4.2 of the Draft EIS.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

COMMENT WRB-3 - Socio-Economic and Growth Inducing Factors
The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways

Mr. William R. Syfers
Page 4
August 20, 1997

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Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOY's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOY and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (appendix E), and Sections 3.5, 3.6, 6.0 and 8.25-22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8621.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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MAKENA RESORT
MAUI PRINCE HOTEL

June 19, 1996

Sent via facsimile:
(808) 541-3462

Mr. David Welhouse
U.S. DEPT. OF TRANSPORTATION
Federal Aviation Administration
Honolulu Airports District Office
Honolulu, HI 96850

Dear Mr. Welhouse:

The extension of the Kahului Airport runway is an issue that many Mauians are truly aware of and have expressed concern either for or against it.

As the Regional General Manager of two hotels (the Hawaii Prince Hotel Waikiki on Oahu and the Maui Prince Hotel on Maui) located on different islands, I have witnessed the impact that domestic and international travel has had on our visitor industry.

Unfortunately, the issue of extending the runway on Maui has been a long and drawn out one. We are extremely hopeful that with the final environmental impact statement soon to be completed, this issue will result favorably for the residents of Maui County and State of Hawaii collectively.

As you may well be aware, 53% of Maui County workers are employed one way or another by a company directly involved with our visitor industry. The Makena Resort has been affected by low visitor count to Maui when we were forced to downsize our labor force which had in some areas left a negative impact to our mainland and international guests. With the expansion of the airport runway, this will allow us to hire more of our island residents for employment and therefore decrease the number of residents who are presently unemployed.

On the average, the amount of monies spent by both domestic and international visitors is more than \$2 billion annually. In 1995, \$120 TAT (transient accommodation tax) dollars were brought to our State of which Maui County alone, received \$18 million. Maui County was fortunate however, after having to rebound from several years of low occupancies, loss of jobs for many of our island residents that resulted in high unemployment and a negative impact on other public services.

MAKENA RESORT
1111 HONOHI (808) 541-3462 FAX: (808) 541-3462

Mr. Welhouse
June 19, 1996
Page Two

With our present economy here in Hawaii experiencing cut backs in several needed human services programs and county and state services, the expansion of the Kahului Airport runway can only result in a positive impact for not only Maui County but the entire State of Hawaii. This expansion will also allow us in the visitor industry to market Maui County positively with direct flights making it "travel friendly" for those wanting convenient airline connections to Maui or Hawaii.

With the Convention Center on Oahu already under construction, the expansion of the Kahului Airport runway would serve as an alternate route for travelers thereby assisting with any overload situation that could possibly occur at the Honolulu Airport. As safety is truly an important and a priority issue, expanding the Kahului Airport runway would again serve as an alternate route should the Honolulu International Airport or Kona Airport be faced with a disaster situation.

Mr. Welhouse, we need this expansion, for our State, our County and more importantly for the people of Hawaii. Yes, we will always have differences of opinions on issues, yet this makes for a healthy nation. But let's not overlook why this expansion is so necessary. Everyone benefits, everyone profits, the end result is a healthy Hawaii. We need to once again become the healthy State that we once were several years ago. Let's think of the positive impact this will have on the future of our island children.

Sincerely yours,

Donn J. Takahaahi
Regional General Manager

USC

c: Mr. Kazu Hayashida, State of Hawaii - Dept. of Transportation

MAKENA RESORT
1111 HONOHI (808) 541-3462 FAX: (808) 541-3462

See Comment 2/11



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
889 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

RECEIVED
DEPARTMENT OF TRANSPORTATION
BRIAN K. NIKAAI

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Mr. Donn J. Takahashi
Page 2
August 20, 1997
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the amount of time aircraft spend circling the Airport, which, in turn, decreases that number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport.

For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821. Very truly yours,

Ben Schlapak

KAZU HAYASHIDA
Director of Transportation
Attachment: As noted above

C: Federal Aviation Administration (D. Welhouse)

Mr. Donn J. Takahashi
Regional General Manager
Makana Resort/Maui Prince Hotel
5400 Makana Alanui, Makana Resort
Kihei, Hawaii 96753

Dear Mr. Takahashi:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your support of the Proposed Project and your comments on the Draft EIS. Your comments will be made available to the decision makers prior to a final decision on the Proposed Project. This letter is in response to your comments of June 19, 1996 which are attached for reference.

COMMENT DJT-1 - Aviation Safety

The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix N ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current Federal Aviation Administration (FAA) standards; (ii) eliminating the trees which penetrate the approach surface to Runway 20; (iii) lengthening the runway for landings and aborted takeoffs; (iv) enlarging and relocating the displaced landing threshold for Runway 2; and (v) relocating the helicopter operations to a site further away from Runway 2-20.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights, reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing

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REKUMAJI CARSTAKO
GAMBARA



PAJUHAYANGA
LAKSIAN
KAWAYANG
GEMING OMBOTO
BRIAN K. MINAAI

1063 E. Main Street, #613
Wailuku, Hawaii 96793

May 18, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
P.O. Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse:

At a recent gathering of our religious organization, one of our members informed us that the latest Environmental Impact Statement (EIS) for the proposed Kahului Airport runway extension, and the consequential internationalization of the airport, did not adequately address the question of alien species which may be introduced into the island of Maui.

I was also very disturbed that the National Park Service was not allowed to participate in the drafting of the EIS. Haleakala National Park is home to many endangered native species of plant and animal life on the island. As the custodian of our most vulnerable wildlife resource, The National Park Service should have been consulted about the negative impacts that a lengthened runway and consequential internationalization may cause to Haleakala National Park.

Unless the issue of the introduction of alien species into the island of Maui is thoroughly addressed, and other negative impacts on the quality of life (e.g. increased economic development causing a depletion or deterioration of our water sources; more traffic and noise) are given more study, the runway extension should not be allowed to proceed.

Your response to these concerns would be most appreciated.

With warm Aloha,

Walter T. Tamao
Walter T. Tamao

c: DOT - Airports Division
c: Office of Environmental Q.C.

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 KUNCHIBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Walter T. Tamao
1063 E. Main Street, No. 613
Wailuku, Hawaii 96793

Dear Mr. Tamao:

Subject: Comments on Draft Environmental Impact Statement (EIS) of Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 18, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT WTT-1 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's Interisland flights. Recently, however, JAL

has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT WTT-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with

or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT WTT-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference material as well as direct experience in the area of alien species impacts and control.

COMMENT WTT-4 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry

attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts.

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a

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COMMENT WTT-7 - Noise

The noise impacts of the Proposed Project are discussed in Section 3.2 of the Draft EIS. Based on the analyses conducted, it was determined that the proposed extension of Runway 2-20 will not significantly affect incompatible land uses in the Airport's environs. It may reduce some noise impacts in the East Spreckelsville Community. The potential noise impacts of the proposed parallel runway may have a significant effect due to its redistribution of noise in the Airport environs. However, it will not likely generate new incompatible land uses other than those which presently exist. The parallel runway and the runway use plan will be subjected to additional environmental analysis prior to construction to the extent required by law.

In compliance with FAA requirements, a Noise Compatibility Program for Kahului Airport was voluntarily initiated by the HDOT, Airports Division, in late 1987. This Program identifies specific measures to be taken to assist in the reduction of aircraft generated noise and incompatible land uses within the Airport's environs. As the sound attenuation and avigation easement mitigation measures recommended in the Noise Compatibility Program are implemented, the amount of incompatible land use within the Airport's environs will be reduced. The relocation of the "reverse thrust" contours will have an insignificant effect on adjacent noise sensitive land uses and there will be insignificant changes in the "departure" contours.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: AS noted above

c: Federal Aviation Administration (D. Welhouse)

Mr. Walter T. Tamao
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sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT WTT-5 - Water Resources

Water supply issues are addressed in Section 3.22.1 of the Draft EIS. Based on the analyses conducted, the airport water demand, as a percentage of the total water consumption, will remain essentially unchanged. The development of new flight kitchens, increased commercial activities, and natural increases in population and average daily visitor levels will add to demands on the Island's potable water supplies. These latter increased demands are expected to occur regardless of the proposed airport improvements.

COMMENT WTT-6 - Traffic Impacts

Existing and future surface transportation and traffic impacts are discussed in Section 3.22.8 of the Draft EIS. Based on the analyses conducted, none of the existing intersections and roadways would experience significant adverse effects as a result of the Proposed Project. The Proposed Project, when compared to the No-Action Alternative, creates measurable positive impacts at certain intersections. However, with or without the Proposed Project, several existing intersections will be in excess of the planned capacity and/or will result in unacceptable service levels.

Joy Tamayose
2500A Kaupakahu Road
Haleiwa, HI 96706

May 21, 1996

Mr. David J. Welhouse
FAA, Airports District Office
P.O. Box 50244
Honolulu, HI 96850-0001

Dear Mr. Welhouse:

Aloha. As a local Maui resident, born and raised on the island during the 1960s and 1970s, I was fortunate to see Maui before the uncontrolled growth over the last twenty years.

I still love Maui, even though much has changed. Maui has my family and friends, beautiful and unique natural areas, open space, rural character, and pleasant weather. Many other people here love Maui for the same reasons. For me and for them, Maui is a good place to live.

But not only is Maui conducive to living—for people, Maui also provides good habitat for alien flora and fauna. Alien plants, animals and insects quickly establish themselves in our beautiful climate. In their native habitat these aliens are kept in check. But here on our island these aliens thrive because the predators or other conditions that would prevent unrestrained growth are absent. Aliens wreak havoc on our natural resources that we residents depend upon.

Because Maui is a small island, it is not inconceivable that these aliens will be transported to areas outside the airport proper. After all, visitors that arrive at Kahului Airport do not remain there. They head for all corners of the island—Kaanapali, Kihei, Upcountry, Hana, and Haleakala to name a few places. There are fertile agricultural fields surrounding the airport on one end. The ocean and a wildlife sanctuary for endangered Hawaiian stilt and Hawaiian coot surround the airport on the other ends. There is a national park, home to native flora and fauna found nowhere else in the world, only fifteen miles away from the airport. This national park happens to be Maui County's number one visitor attraction. It receives visitors from all over the world on a daily basis, many come directly from the airport to see Haleakala's beautiful sights. State natural areas and parks as well as County parks, are even closer to the airport.

Currently the State and Federal officials are ill-equipped to handle alien species entering through Kahului Airport and Kahului Harbor. Both agencies are understaffed and lacking proper facilities to inspect incoming planes, ships and their cargo of people and goods. How can we consider further expansion of the airport when we are unable to handle the number of people presently passing through? The airport runway expansion will greatly increase the number of visitors to our island (as stated in the EIS) and it will bring people from other nations far away. We have already seen the destruction of South/Central American plants such as miconia and banana poka. What other foreign plants will we battle next?

The ramifications of alien species introductions are many. Alien species are a complex and costly problem. It is more difficult to eradicate an alien species once it is established as opposed to preventing the alien species from invading in the first place. The State, Federal, and County governments already spend enormous amounts of time and money controlling alien species that threaten the integrity of our watershed and the viability of our agricultural crops, not to mention the survival of native Hawaiian species.

The draft EIS does not address the effects of alien species introductions outside the airport despite the fact that the airport is definitely a source of arrivals. It would be unwise to approve the draft EIS knowing this major inadequacy.

I love Maui. I want to keep Maui, Maui for the Hawaiians, the local people, the residents, and the native flora and fauna; for most of us this is the only home we have.

Mahalo for your time and consideration.

Sincerely,

Joy Tamayose

Joy Tamayose

See Comment J1-1



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 BUNCHOWAY STREET
HONOLULU, HAWAII 96813-5097

PAZUNAVASAKA
DIRECTOR
REGISTRATION
GENERAL OPERATIONS
BRIAN K. HINAI

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and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

Ms. Joy Tamayose
2500A Kaupakalua Road
Haiku, Hawaii 96708

Dear Ms. Tamayose:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 21, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT JT-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

Ms. Joy Tamayose
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regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: AS noted above

c: Federal Aviation Administration (D. Welhouse)

KAZUHAYASHIDA
DIRECTOR
OFFICE OF THE DIRECTOR
STATE OF HAWAII
BRIAN K. MINAMI

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STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PURCHONVILLE STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

BENJAMIN J. CAVE, JR.
COUNCIL MEMBER

Attn. Owen Miyamoto
Department of Transportation, Airports
Honolulu International Airport
400 Rodgers Blvd. # 700
Honolulu HI. 96819

A recently completed environmental impact statement (EIS) fails to adequately address the question of alien species; in fact it virtually ignores the issue. I need to make my voice heard during the public comment period, due to expire May 23. I'm writing to you to make the following points:

The (EIS) inadequately addresses the most serious issue raised by expanding Kahului Airport: the risk of introducing non-native species. It is therefore unacceptable. In fact, the Federal Aviation Administration (FAA) has already indicated its belief that airport expansion would pose no threat to endangered species.

The (EIS) fails to establish inspection and quarantine procedures for the airport. If international flights start landing without such procedures, the chances of disaster striking are multiplied immeasurably.

The FAA and Hawaii Department of Transportation, joint authors of the EIS, have excluded the National Park Service from discussions. The Park Service is our steward of the land and resources at Halcakala; its absence from the process makes the conclusions of the (EIS) suspect, at best.

Michael G. Tappeiner
Sincerely: Michael G. Tappeiner
1605 Ainakea St.
Lahaina, HI. 96761

Mr. Michael G. Tappeiner
1605 Ainakea Street
Lahaina, Hawaii 96761

Dear Mr. Tappeiner:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MGT-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

See Comment MGT-1
See Comment MGT-2
See Comment MGT-3

Mr. Michael G. Tappeiner
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In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the

Mr. Michael G. Tappeiner
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FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures".)

COMMENT MGT-2 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

COMMENT MGT-3 - International Flight Operations

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis

Michael G. Tappeiner
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If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8621.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Melhouse)

Mr. Michael G. Tappeiner
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of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights.

Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. (See attachment "International flights")

COMMENT MGT-4 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, and has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

May 9, 1996

TO: David Welhouse, Federal Aviation Administration
FROM: Jack Thompson
RE: Additional Responses to the Draft EIS

1. **Puunene stack:** I have never really received a good answer to the mill stack intrusion at the south end of runway 2-20. As I understand it, the stack intrudes 6' into the glide space now. As 2-20 moves 2600' south, that intrusion is 65'. I understand that some of the extension will be lost for landing purposes and that all flights will takeoff from the south end and the intrusion is no problem. But, and here's what needs clarification, what happens during Kona conditions? Do these new direct flights leave Kahului partially loaded or does the FAA see the stack as no problem under these conditions?

See Comment J1-1

2. **Noise abatement:** A noise abatement plan/program is completely ignored again. The kind of abatement program we have discussed is more than flight paths; it is using the electronic measuring devices which will be installed for purposes of updating LDN contours. This kind of a program means that the citizens and the DOT/FAA agree on an acceptable noise maximum. A space is setup at the airport for computer monitors to record all flights landing and taking off from Kahului. Personnel are employed to monitor the computer and maintain a log of all violations. When an airline violates beyond an agreed standard, that airline is punished, either financially or by removing one of their flights from their schedule. This approach is used all over the world and especially in the U.S. As I understand it, the airlines in Hawaii have been the ones who have resisted. The wrong people are making that decision. Airport authorities should be the ones calling the shots not the airlines. The why or why not of this issue needs to be reviewed in the EIS.

See Comment J1-2

3. **Resident growth:** I think it's fair to say, at this point, that international flights will bring a vast number of additional visitors to Maui. With visitors comes an increase in resident population. (This because visitors need someone to serve them.) This EIS ignores the housing problems created by this project. Where will these workers live? Can they exist on service-level pay? Should businesses be responsible for employee housing?

See Comment J1-3

4. **Internationalization:** Our Spreckelsville Community Association conducted a survey of all residents regarding several issues confronting us. They were collected prior to our annual meeting on February 23, 1996. One question asked, "Do you support an international airport at Kahului? Why?" The results were: No 89%, Yes 11%. Since Spreckelsville is the recipient of the most noise from airplanes, I would hope this overwhelming rejection by people who live here would be given serious consideration.

See Comment J1-4

5. **Night flights:** The EIS recommends Kahului allow only stage 3 airplanes after 10:00 pm. As you know, the state has, in the past, been reluctant to enforce this curfew. The Part 150 is very wishy-washy on it. People who do not live here do not know the disturbance these stage 2 flights create. One major worry about internationalization is that flights will be arriving at all hours day and night and there will be no controls to keep that from happening. Some kind of curfew, with teeth, needs to be included in this study to give Maui residents some relief.

See Comment J1-5

Mahalo for your considerations.



Jack Thompson, President
Spreckelsville Community Association
204 Kealahai Place
Paia, Hawaii 96779
Tel. 877-5749
Fax 877-3310
EMail jjmaui@maui.net



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
863 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

MAOUI HAVANA
DIRECTOR
COMMUNITY RELATIONS
CELESTIA OROFIO
BRIAN K. MINAII

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Mr. Jack Thompson
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August 20, 1997

Mr. Jack Thompson
President
Spreckelsville Community Association
204 Kealakai Place
Paia, Hawaii 96779

Dear Mr. Thompson:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 9, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT JT-1 - Puunene Stack

The airspace impacts of the Puunene Stack on the Proposed Projects was studied in the 1993 Master Plan and by the Federal Aviation Administration (FAA) during its review of the Airport Layout Plan. The stack should not interfere with aircraft departure weight during Kona wind conditions.

COMMENT JT-2 - Noise Abatement

As part of the Part 150 Noise Compatibility Plan, a noise monitoring system will be installed at Kahului Airport to monitor the noise environs and its affect on the community. Your description of "financial punishment" for violators beyond an agreed noise standard has been implemented at some airports with some success; however, this type of program was most likely implemented prior to the enactment of the provisions to the "Airport Noise and Capacity Act of 1990" (ANCA). In addition, these types of programs must be consistent with FAR Part 161. This issue was analyzed in Section 7.2.7 of the Noise Compatibility Program Report of September 1995 for Kahului Airport.

In order to impose any type of "maximum permitted noise levels" at the airport, an agreement would have to be reached with FAA that the imposition of these noise levels are not inconsistent with, or illegal as a result of ANCA, the federal airport improvement program legislation, any contractual obligations to the United States and the FMA under the Airport Improvement Planning grant agreements, or any other provision of the federal law.

The aircraft noise problem is an existing problem that will not be increased, and will possibly be decreased by the Proposed Project. The noise analysis performed for the Draft EIS is discussed in Section 3.2 and Appendix C. As indicated in the Draft EIS, the majority of Spreckelsville, with or without the Proposed Project, will continue to lie within an incompatible land use area. The State of Hawaii, Department of Transportation (HDOT), Airports Division, will continue to pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce the existing incompatible land uses within the Airport's environs.

COMMENT JT-3 - Resident Growth

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc., beyond that which would occur if the Proposed Project were not implemented.

Mr. Jack Thompson
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implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT JT-4 - Internationalization

Thank you for your comment on internationalization. Your comment will be made available to the decision makers prior to a final decision on the Proposed Project.

COMMENT JT-5 - Night Flights

The EIS recommends that the State pursue the Part 161 study as stated in the Noise Compatibility Program which may allow the State to phase out Stage 2 aircraft during night time hours at a future date. The State has attempted to phase out Stage 2 aircraft at night from Kahului Airport, but was not successful. At this point in time, there are no curfews at Kahului in regards to Stage 2 or Stage 3 aircraft. Any international flight which arrives or departs from Kahului Airport will be a stage 3 aircraft.

Mr. Jack Thompson
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The SIAR focused on the possible impacts caused, principally by growth in the visitor industry, attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to

CORRECTION

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

Mr. Jack Thompson
Page 4
August 20, 1997

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Mr. Jack Thompson
Page 3
August 20, 1997

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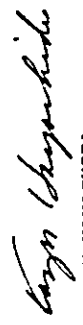
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Mr. Jack Thompson
Page 5
August 20, 1997

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Melhouse)

RECEIVED AIRPORTS DIVISION (808) 838-8821



HAWAII HOTEL ASSOCIATION
2250 KALAKAUA AVENUE #404-4
HONOLULU, HI 96815-2564
TELEPHONE: (808) 923-0407
FAX: (808) 924-3843

Mr. David Welhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Honolulu, HI 96850

May 17, 1996

Dear Mr. Welhouse:

I am writing on behalf of the Hawaii Hotel Association. Our association represents 170 hotels and 300 allied companies statewide. Our membership includes 37 hotels and condominiums in Maui County. We would like to register our strong support for the proposed improvements at Kahului Airport. These improvements are necessary infrastructure upgrades that will help keep Maui competitive as a destination into the 21st century.

These improvements are certainly consistent with the identified public policy of diversifying the visitor industry and encouraging visitors to travel to the neighbor islands. In order for this diversification and dispersion to occur, improved infrastructure is necessary. This is especially true with airports since virtually all our visitors reach Hawaii by air.

Lengthening the Kahului runway will provide major opportunities for Maui to receive visitors directly from their point of origin. This improved access will enhance Maui's competitiveness both in Hawaii and around the world. Enhanced competitiveness is essential because the traveler has far more destinations to choose from today than even a decade ago. Remaining competitive must remain at the top of our priority list as visitors seek to save money and reduce travel time.

The lengthened runway will greatly expand the areas that can be directly served from Maui. This is especially important because planes will be able to fly directly to points East of the Rocky Mountains in the U.S. and to Japan.

Since approximately 50% of the jobs on Maui are directly involved in the visitor industry, Maui's need to be competitive is great. We, therefore, urge quick approval of the E.I.S. and implementation of the recommended improvements.

Aloha,

Hawaii Hotel Association

Murray E. Towill
Murray E. Towill
President

MET/sh



American Hotel & Motel Association

INTERNET FAX LINE
LAWSON



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Mr. Murray E. Towill, President
Hawaii Hotel Association
2250 Kalakaua Avenue, Suite 404-4
Honolulu, Hawaii 96815-2564

Dear Mr. Towill:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your letter of May 17, 1996 in support of the proposed Kahului Airport improvements. Your letter and this response will be appended to the Final EIS.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

PAUL HARRISON
DIRECTOR
OFFICE OF AIRPORTS
BRIAN A. MINAMI

PHOTOGRAPHY
SECTION
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187-C Hekulani Street
Hilo HI 96720

May 23, 1996

Mr. David J. Welhouse
U.S. Dept. of Transportation
Federal Aviation Administration
Honolulu Airports District Office
P.O. Box 50244
Honolulu HI 96850-0001

and

Mr. Ren Schlapak
Department of Transportation
Airports Division
400 Rodgers Boulevard, Suite 700
Honolulu HI 96819-1880

Dear Messrs. Welhouse and Schlapak:

Re: Draft Environmental Impact Statement for Kahului Airport Improvements

Thank you for the opportunity to comment on this document. I have the following concerns about the proposed project as described in this five-volume report.

[Exclusion of National Parks Service as a cooperating agency. Reference: Pages 1-8, 1-9. The list of consulted parties includes a group whose sole reason for existence is to lobby for the Kahului airport runway lengthening (the Peco Coalition). I do not understand why the interests of this body would be officially taken into account. (For one thing, they never seem to have taken a position at variance with that of the proposing agencies. It is questionable that their input is qualitatively anything more than that of a cheerleading squad.) Second, the need to address environmental concerns is indirectly acknowledged, in allowing the Nature Conservancy of Hawaii to serve as a consultant party. Yes, the specific request of the National Park Service to be a cooperating agency was rejected by the Federal Aviation Administration and the state Department of Transportation. I would suggest that the NPS has at least as much expertise in environmental concerns as the Nature Conservancy of Hawaii. If the one could be granted status as a consulted party, why couldn't the other have been granted standing as a cooperating agency? The failure to cooperate with the NPS casts doubt on the good faith of the proposing agencies to address environmental concerns in a meaningful fashion.

[Updated air traffic forecasts were not taken into account. Reference: Pages 1-22, 1-23. I am dismayed to learn that the revised downward forecasts for airport traffic are regarded as insignificant in determining the scope of the proposed project. The DEIS states, "This planning process uses the aviation demand forecasts as only a small part of the overall process." But if aviation demand is absent, it would seem as though the foundation for the entire project crumbles. The relationship between demand and the proposed project must be described more comprehensively. Moreover, there would seem to be some basis for questioning even the revised forecasts. According to Appendix E, the nation's largest tourism and hospitality industry consultant, Coopers & Lybrand, described the DOT forecasts as "aggressive."

[Installed but non-operational or dysfunctional facilities. Scattered throughout the document are references to facilities built at the airport which, because of design flaws or other, unsated reasons, are not presently working or, if working, are constrained by design flaws from optimum operation. Examples

include the VORTAC (reference page 1-14), which is said to have been built in 1995. "But is currently not operating." Why is this facility not working? Are taxpayers expected to pay for its relocation to a new site when, evidently, the site on which it is built is unsuitable? Who designed its present location? Why is it not suitable?

Another example of poor planning, apparently, is the new passenger terminal's location with respect to the FAA Air Traffic Control Tower (page 2-13). The DEIS states that, "because of the ATCT's location relative to terrain and buildings that have been constructed adjacent to the East Ramp, certain portions of the apron used by helicopters cannot be seen by controllers. This complicates the task of controlling the ground movement of these aircraft. The northernmost portion of the new passenger terminal obstructs the controllers' views of Taxiway II, portions of Taxiway F, and the commuter terminal apron." Did no one think of this before spending the millions of dollars on the new passenger terminal?

Again, because of design flaws, the Aircraft Rescue and Fire Fighting Facility was hampered in its ability to respond to aircraft emergencies by the new passenger terminal. (Reference: page 2-13). This appears to have prompted construction of a new facility in 1994, causing the older facility to apparently be abandoned, though still "in relatively good condition."

I raise these points because it suggests that planning behind airport facilities has been shortsighted and extremely costly. This gives one reason to worry that these same types of gross planning errors -- errors of the sort that may not be visible to the general public -- run through the plans for the proposed project. In other words, the knowledge that plans have the blessing of state and federal regulators is by no means sufficient to ensure against multimillion dollar blunders. Has any provision been made for independent review of these plans by an outside technical consultant?

[Impacts on Haas Highway Blar Rowe. There is an acknowledged impact, but no mitigation is described. Rather, mitigation is put off until some future time, when the Airport Access Roadway is actually designed (page 1-15). One of the purposes of an environmental disclosure document is to explain what types of measures are available to mitigate identified impacts. Putting off a description of possible means of mitigation does not comport with the legislative intent of the National Environmental Policy Act or the Hawaii Environmental Policy Act.

[Impacts of alien species. Again, there is only a cursory statement: "To mitigate the introduction of alien species, [DOT] will support the Department of Agriculture in obtaining funding and equipment." Given the potential havoc that could be caused by introduction of even one pest species, it is incumbent on the proposing agencies to do more than offer moral support to the state Department of Agriculture. Rather, they should begin working with all potentially affected parties (including the National Park Service) in designing an aggressive inspection system. While the DEIS includes as Appendix O the public-private Alien Species Action Plan, this plan is advisory only and does not commit the proposing agencies to any real action.

[Curfew on operation of Stage 2 aircraft. The DEIS acknowledges this to be a problem "to be resolved." However, resolution would seem to be hung up with the admission (page 1-20) that [DOT]-AIR "has recently suspended amending Hawaii's Administrative Rules Chapter 19-28." The DEIS should state how the proposing agencies intend to surmount this hurdle.

[Construction of a parallel runway. The SASP forecasts for aviation demand predict that existing capacity will be exceeded by the year 2010 and this is used to justify construction of a parallel runway. These forecasts are not reliable, as acknowledged in the DEIS itself. But rather than abandon the projections of the SASP, the DEIS merely chooses to place them off in the future. The premise is that growth is inevitable; the only question is its timing. I do not believe this is a valid premise. At the very least, given the billions of dollars of taxpayer money that ride on decisions made as a result of this document, this premise must be explained or justified.

See Comment PT-1

See Comment PT-2

See Comment PT-3

See Comment PT-4

See Comment PT-5

See Comment PT-6

See Comment PT-7

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14/01/1998



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1625 PUNAHONUA STREET
HONOLULU, HAWAII 96813-5007

KATHARINA
LUCIFER
NATIONAL GUARDIAN
DRIAN K. RITHAI

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August 20, 1997

[General aviation facilities, air taxi facilities, and FBOs. Growth is predicted for all these operations and meeting their demands is assumed to be an obligation of the proposing agencies. However, where is it written that the state must accommodate every airplane owner with a hangar, or every air taxi operator with a base of operations? The state is under no obligation to provide these facilities, with the support they need. If it continues to do so, growth in these sectors could easily exceed market demand, leaving the state with facilities that it cannot rent or otherwise use.]

See Comment PT-8

[Growth impacts. The DEIS states (Appendix E, and elsewhere) that the proposed project is neutral with respect to fostering economic growth. If so, arguments supporting its construction by the tourist industry (which claims the airport project is needed to allow market expansion) are misguided. And, again, if the tourist industry's growth is not a function of airport improvements, then the proposed project becomes merely one of convenience, not of necessity. (At no point is it argued in the DEIS that the improvements are needed to make the airport safe.) Is convenience a sufficient justification for a project of this scope?

See Comment PT-9

I believe, to the contrary, that the airport expansion, as outlined in the proposed project, will foster growth and will bring a range of associated impacts, none of which is addressed in the DEIS.

See Comment PT-10

[Underground fuel lines. The DEIS states that an underground fuel line system is already in place at the terminal area, although unused. It proposes eventually to install a connecting line to Kahului harbor, which would run through Kanaha Pond. As the recent spill from the Chevron pipeline in Oahu indicates, even apparently well-maintained pipelines can suffer leaks. A leak the size of the Chevron spill at Kanaha pond would be disastrous.

What safeguards have been installed on the existing underground terminal fuel delivery system to ensure that, should it be operated, it will not result in petroleum products leaking into the underlying water table? If such leaks occur, they would almost certainly impact Kanaha Pond, which is fed by underground water sources.

These are only a few of my concerns. In general, I would agree with the points raised by Dana Naurie Hall, Isaac Hall, the National Parks Conservation Association, Mary Evanson, Renae Gasman-Duvall, and most of the project's other critics at the hearing held on Maui May 8. I hereby include these objections by reference in my own comments.

Yours truly,

Patricia Tummons
Patricia Tummons

Ms. Patricia Tummons
187-C HOKULANI STREET
HILO, HAWAII 96720

Dear Ms. Tummons:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 23, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT PT-1 - National Park Service (NPS) Participation in Preparation of Draft EIS

The Nature Conservancy of Hawaii and the Puelo Coalition were not consulting parties as defined under the Hawaii Revised Statutes, Chapter 343 (HRS 343). In addition, the NPS did not request to be a consulted party under HRS 343. The Cooperating Agency issue is discussed in Section 1.3.3 of the Draft EIS. Additional information is provided below on cooperating agencies and the NPS request for cooperating agency status.

A cooperating agency may be any federal agency other than the lead agency that has jurisdiction by law or special expertise with respect to the environmental impacts expected to result from a proposal [40 CFR 1508.5; 1501.6]. An agency has "jurisdiction by law" if it has the authority to approve, veto, or finance all or part of the proposal [40 CFR 1508.15]. An agency has "special expertise" if it has statutory responsibility, agency mission, or related program experience with regard to a proposal [40 CFR 1508.26].

state and federal agencies must make diligent efforts to involve the public in implementing their HEPA and NEPA processes. Pursuant to these requirements of HEPA and NEPA, substantial efforts were made in connection with preparation of this EIS to involve the public in the environmental review process.

COMMENT PT-2 - Air Traffic Forecasts

The air traffic forecasts used during the preparation of the Draft EIS were the latest forecasts available and published as the "Update of Hawaii Aviation Demand Forecast", October 1994. These forecasts are discussed in Section 1.8.3 of the Draft EIS. As these forecasts are updated, our planning for airport facilities is also updated. Based on the latest forecasts, the time period for the need of the demand related projects were shifted six (6) years into the future. However, we do not anticipate major changes to the Kahului Airport improvements described in the Draft EIS. Should future forecasts indicate slower or less growth than presently projected, we will revise our improvement projects accordingly. For example, should the forecasts indicate the lack of need for the proposed parallel runway, we will defer that project until it is forecast to be required for efficient airport operations.

The relationship of aviation demand to the Proposed Project is discussed in detail in Section 2 of the Draft EIS. As stated in the Draft EIS, the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the County and State, and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

Furthermore, an EIS may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public. Incorporation by reference is a procedure for reducing the size of EISs and is particularly appropriate for long, descriptive, or technical materials. When a document is incorporated by reference in an EIS, the lead agency must make the document available for inspection at its offices.

On the lead agency's request any other federal agency with jurisdiction by law or special expertise may be a cooperating agency. In addition, the lead agency may request any other federal agency with special expertise regarding any environmental issue to become a cooperating agency [40 CFR 1501.6]. A lead agency, however, is not required to designate an agency as a cooperating agency; rather, any such designation is discretionary.

Although an agency may not be formally designated as a cooperating agency, that agency may still participate extensively in the environmental review process by participating in the scoping process, developing information to be reviewed and, at the lead agency's discretion, included in the EIS, providing staff support in the EIS's preparation, and requesting a meeting with the lead agency to discuss the agency's concerns [40 CFR 1501.6].

The NPS requested that it be designated as a cooperating agency for purposes of preparation of the EIS for the proposed improvement projects. Although the NPS was not formally designated as a cooperating agency, the Federal Aviation Administration (FAA) and the Hawaii Department of Transportation (HDOT) used the environmental analysis and proposals from the NPS to the maximum extent possible in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

Lastly, the NPS has been an active participant in the preparation of the Alien Species Biological Assessment that will be included in the Final EIS. The FAA and HDOT, Airports Division, included the NPS as members of a Biological Assessment Technical Panel that provided key information and guidance to the FAA and HDOT, Airports Division, during the preparation of the Alien Species Biological Assessment. We, too, value the NPS expertise and are appreciative of the information they have provided regarding the alien species issue and potential impacts to Haleakala National Park as a result of the potential increase in the introduction of alien species.

The following is in response to your question regarding the Pueo Coalition. The FAA and HDOT were willing to meet with the various parties which have been involved with the Proposed Project. Public participation in the environmental review process is a crucial part of the NEPA and HEPA process. The success of NEPA and HEPA as an environmental disclosure and problem-solving law is based on open decision-making. Therefore,

Neither NEPA nor NEPA require that incorporated materials be circulated for public review with the EIS, nor do they require circulation or public availability of subsidiary documents that are incorporated in a document that is then incorporated into the EIS. However, at the request of the commentator, the "Update of Aviation Demand Forecasts", will be included as an Appendix to the Final EIS.

COMMENT PT-3 - Installed but Non-Operational Facilities

At the time of the publishing of the Draft EIS, the FAA was in the process of testing the operation of the new VORTAC facility. The new VORTAC is a key element in the navigation of aircraft in the vicinity of Maui. Therefore, it is required and essential that the facility be approved by the FAA prior to being placed into operation. The monies used for the airport improvements are through the Federal Airport and Airways Development Act and generated from aircraft and airport revenues. The funding for the facility was not generated by tax revenues.

As pointed out in the Draft EIS, the airport is a dynamic place and proper planning is always a consideration in the placement of new facilities. During the planning process, many factors are examined including, but not limited to, efficient airport and aircraft operations, aviation and passenger safety, existing and forecast aviation demand, passenger comfort, available space, land constraint, environmental impacts are all considered in the layout of these facilities. As stated in the Draft EIS, the goal is to create an airport infrastructure which will support the present and future goals and objectives of the county and State; and to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui.

The Air Traffic Control Tower was placed at this site prior to the construction of the Passenger Terminal. Operational procedures were developed and are currently being used to compensate for the restricted visibility for the taxiways, commuter apron and the helicopter areas. The Proposed Project will not impact the current restricted visibility of the taxiways and commuter aprons from the Air Traffic Control Tower.

The conflict of the new Passenger Terminal and the "old" Airport Rescue and Fire Fighting (ARFF) station was recognized during the

planning for the Passenger Terminal. The recommended solution was to relocate the ARFF station to another site. The "old" ARFF Station is planned to be reused for airport and airline support functions.

We disagree with your remarks regarding poor planning, however, your comments will be provided to the decision makers.

COMMENT PT-4 - Impact on Hana Highway Bike Route

The Hana Highway Bike Route is discussed in Section 3.22.8.6 of the Draft EIS. As indicated in the Draft EIS, and stated in your letter, the approaches to mitigating the safety concerns on the Hana Highway bike route will be considered during the design process for the roadway improvements. The Final EIS will reflect a preferred mitigation measure. (See attached bike route)

As you may be aware, the State actively pursues the establishment of bike routes and provides space for those routes on State highways when it can be done so safely. The Hana Highway bike route is an important component of the island's transportation facilities, and we intend to do everything we can to protect that route and the safety of the users of that bike route. In addition, we have proposed additional bike routes on the Airport access roadway and allowed the County of Maui the use of Airport land for the Northshore Greenway Bike Route.

COMMENT PT-5 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior NPS, Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic and international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 407.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS

consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT PT-6 - Curfew on Stage 2 Aircraft

The State of Hawaii, has stopped seeking a curfew at Kahului, as the HDOT, Airports Division, needs to successfully complete a FAR Part 161 study prior to implementing restrictions on or a phaseout of Stage 2 operations in Hawaii, as directed by the FAA.

The Airport Noise and Airway Capacity Act (ANCA), phased out the use of Stage 2 aircraft in the contiguous 48 States by the Year 2000, and exempted Hawaii and Alaska. ANCA also required that if an airport authority would like to phaseout Stage 2 aircraft prior to the ANCA established Stage 2 phaseout date, the airport authority must perform an analysis under FAR Part 161. As no phaseout date for Stage 2 aircraft in Hawaii was established, the HDOT, Airports Division, will need to complete a FAR Part 161 study, in accordance to FAA rules and regulations to establish a Stage 2 phaseout.

COMMENT PT-7 - Construction of Parallel Runway

As indicated in Section 2.5 of the Draft EIS, the parallel runway is a Phase 3 project to be constructed, if required, in the Year 2009 to Year 2016 time frame. Also, as noted above in the response to Comment PT-1, present and future airport projects are planned and constructed based on existing and forecast aviation demand. Should future forecasts indicate the parallel runway is not needed, it will not be constructed. However, to the extent possible at this time, the potential effects of a parallel runway

on the natural and socio-economic factors of the island are discussed in the present Draft EIS. Also, as indicated in the Draft EIS, should it be determined that the parallel runway is required, it will be the subject of future environmental documentation. The funding for the airport projects will use funds derived from airport revenues, and no general fund money will be used.

COMMENT PT-8 - General Aviation Facilities, Air Taxi Facilities and FBOs

As indicated in Section 2 of the Draft EIS, the proposed Kahului Airport improvements are in response to existing and forecast aircraft operations and passenger levels. The general aviation, air taxi, and FBO facilities planned for Kahului Airport are the responsibility of the HPOOT, Airports Division, as stated in the State Transportation Functional Plan. While these facilities may be constructed by the State, lease and rent revenues received by the State for these facilities provides the means to recapture the funds used for construction.

COMMENT PT-9 - Growth Impacts

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts), Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts), and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed

Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project.
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to

Section 3.8 (Water Quality), Section 3.10 (Historical, Architectural, Archaeological and Cultural Resources), Section 3.13 (Hydrology Floodplain Management and Drainage), and Section 3.20 (Solid Waste, Hazardous/Toxic Waste and Waste Wash Water).

If and when the fuel pipeline is constructed, it will be installed and operated by the Airline's fuel consortium, the Hawaii Fueling Facilities Corporation. As currently proposed, the pipeline would be aligned on the ocean side (north) of Kanaha Pond. Given this location, there is a potential for a significant impact on Kanaha Pond and coastal water quality should a leak or line break occur.

However, the pipeline will be designed to include a "quick flush" system, double walled pipes and leak detection sensors to minimize this risk. In addition, the pipeline will be designed consistent with all other federal, state and local regulations in effect. The primary purpose of the proposed fuel pipeline is to reduce dependence on the fleet of fuel tanker trucks which currently convey fuel to the Airport from storage facilities at Kahului Harbor. These trucks must travel along Kana Highway, Haleakala Highway, Kala Road and Eena Street to reach the Airport. Once the trucks arrive at the Airport, they must carry fuel cargo across Runway 2-20 to reach the air carrier aircraft parking apron adjacent to the passenger terminal. This requires clearance from the FAA Air Traffic Control Tower. It is generally accepted that fuel pipelines provide safer, more environmentally sound fuel conveyance system than that provided by tanker trucks traveling along public roads and across runways.

Due to the long-term, speculative nature of the fuel pipeline from Kahului Harbor to the Airport Storage Tanks, the EIS can only discuss potential impacts of this project in general terms. The Chevron pipeline on Oahu is over 40 years old.

A partially completed hydrant fuel system is installed under the main aircraft parking apron at Kahului Airport. It is not in use at this time. In the future, this hydrant system will be connected to the HFFC fuel tanks by underground pipeline. This fuel line is 1,500 feet from Kanaha Pond and is separated by a concrete lined ditch. Therefore, there will be no risk to Kanaha Pond. The pipeline will be designed to the applicable standards.

locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

The issue of aviation safety was discussed in Section 3.22.9 of the Draft EIS. Your comment will be made available to the decision makers prior to the final decision on the Proposed Project.

COMMENT PT-10 - Underground Fuel Lines

The potential impacts of the proposed alignment of the pipeline from Kahului Harbor to the Airport Bulk Fuel Tanks, as well as mitigation measures to minimize those impacts, are discussed in the following sections of the Draft EIS: Section 3.4 (Geology, Physiography, Soils, Agricultural Potential and Earthquakes),

Ms. Patricia Tummons
Page 12
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AIR-EN
97.1116

If and when the pipeline project from the Harbor to the Airport Bulk Fuel Storage Tanks is considered for construction, additional environmental documentation will be required.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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1315



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1625 KUNIA DRIVE, SUITE 100
HONOLULU, HAWAII 96813-5097

May 3, 1996
David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

Re: Airport Expansion On Maui

Dear Mr. Wellhouse:

As Chairman of the Board of Directors at International Colony Club (ICC), a West Maui condominium resort, I felt compelled to write this letter in strong protest to the proposed expansion of the Kahului Airport. We are already being inundated by visitors from the mainland and Asia, and traffic in Lahaina and Kaanapali is overwhelming. During morning and afternoon rush hours, the traffic is stop and go and, frequently, at a total standstill.

Other issues that have not been adequately addressed is the question of introducing non-native (alien) species to Maui and the potential threat that this creates to the many endangered species at Haleakala.

It is also my understanding that the Environmental Impact Statement does not set down inspection and quarantine procedures for arriving foreign flights to the airport. It would seem that such a critical oversight could have been prevented had representatives of the National Park Service been able to participate in the discussions.

Lastly, the vast majority of our homeowners at ICC are definitely opposed to the airport expansion and the resulting overcrowding that would impact the entire island. Some respect needs to be shown for the residents of Maui.

Your serious consideration of these important issues is gratefully requested.

Sincerely,
Kent Ueland
Kent Ueland
President, Board of Directors
International Colony Club
cc: Owen Miyamoto

Dr. Kent Ueland
2750 Kalapu Drive
Lahaina, Hawaii 96761

Dear Dr. Ueland:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 3, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT KU-1 - Purpose of Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT KU-2 - Traffic Impacts of Proposed Project

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed

Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

As you are aware, both Maui County and the State Department of Transportation, Highways Division, are working to alleviate present traffic congestion problems in West Maui and the planned improvements to the surface transportation system are expected to reduce the present congestion situation.

The potential effects of the Proposed Project on the surface transportation system is discussed in Section 3.22.8 of the Draft EIS. As indicated therein, the Proposed Project, in itself, will not have an adverse effect on existing key intersections, and will have positive impacts on other existing intersections. Several existing intersections will be congested with or without the Proposed Project. Although the Proposed Project will not have significant impacts on existing roadways, it will result in congested conditions at new intersections associated with new roadways constructed as part of the Project itself and on existing or planned bike routes. Several mitigation measures will be implemented to alleviate or eliminate these adverse impacts, including the widening of some roadways, the construction of new turn lanes and rerouting the planned bikeway. The mitigation measures adopted will be consistent with federal, state and local regulations and will be implemented by the corresponding federal, state and local agencies.

COMMENT KU-3 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species

(CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction

Dr. Kent Ueland
Page 5
August 20, 1997

COMMENT KU-5 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The HDOT, Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.


COMMENT KU-6 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Weithouse)

Dr. Kent Ueland
Page 4
August 20, 1997

may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT KU-4 - Impact of Proposed Project on Haleakala National Park

The HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other State agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of Alien Species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent have been identified. A copy of the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

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DOCUMENT CAPTURED AS RECEIVED

RECORDED & INDEXED

PAUL HERRERA
DIRECTOR
147774 (Rev. 10/85)
147774 (Rev. 10/85)
Brian K. Mizell

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
1605 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5037



ADDRESS TO
AIR-EN
97.1003

August 20, 1997

Mr. and Mrs. Ed Vaughn
1841 St. Louis Drive
Honolulu, Hawaii 96816

Dear Mr. and Mrs. Vaughn:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 15, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT EV-1 - Inspection and Quarantine Facilities

We agree that current agriculture inspection facilities are lacking at Kahului Airport. One element of the Proposed Project is the design and construction of a new air cargo facility. The State Department of Transportation (HDOT), Airports Division, is committed to the State and Federal Departments of Agriculture, as well as U.S. Customs, being allowed to participate in the planning and design of this building such that they will be able to specify the types of equipment and facilities they require to adequately inspect arriving and departing air cargo, baggage and passengers. This type of facility is expected to facilitate the movement of Maui agricultural products to new and expanded markets, thereby benefitting the entire community.

COMMENT EV-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of

See Comment EV-1
See Comment EV-2
See Comment EV-3
See Comment EV-4

MAY 13 1998

Dear Mr. Wellhouse,

We are writing in regard to the proposed expansion of Maui's airport, Kahului Airport. The EIS did not establish INSPECTION & QUARANTINE procedures for the airport... this poses a great risk of the introduction of non-native species! Haleakala contains endangered species that would be at great peril by the airport expansion. It was the Park Service, included in our discussions. We await your opinion on this matter.

Thank you,
Sincerely,
Edo Debra Vaughn
1841 St. Louis Dr.
Honolulu, HI 96816

Edo Debra Vaughn
1841 St. Louis Dr.
Honolulu, HI 96816



David J. Wellhouse
Federal Aviation Admin.
Airports District Office
Rm 5C 244
Honolulu, HI 96850

Mr. and Mrs. Ed Vaughn
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August 20, 1997

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97-1003

Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the

Mr. and Mrs. Ed Vaughn
Page 3
August 20, 1997

AIR-EN
97-1003

Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT EV-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, and has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Mr. and Mrs. Ed Vaughn
Page 4
August 20, 1997

AIR-EN
97.1003

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



MAUI HOTEL ASSOCIATION

1325 Lower Main, Suite 103, Wailuku, Maui, Hawaii 96793 • Fax (808) 244-3094 • Phone (808) 244-8625

COMMUNITY MEETING
FRIDAY, MAY 2, 9:00 AM '96

May 1, 1996

Mr. David J. Welhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Honolulu, HI 96850

Mr. Kazu Hayashida
State of Hawaii, DOT
Airports Division
400 Rodgers Blvd #700
Honolulu, HI 96819


RE: DRAFT EIS...KAHULUI AIRPORT IMPROVEMENTS

My name is Terry Vencel executive director of the Maui Hotel Association. Our association represents 30 properties and 125 businesses on the island of Maui. We employ approximately 10,000 residents. The Maui Hotel Association is supportive of the Kahului Airport Improvements as stated in the DRAFT EIS.

I'd like to address two of the ongoing issues of the proposed project, noise and pest control.

While we can sympathize with Sprecklesville residents about noise, we also know that it is cost prohibitive at this time for neighbor island carriers to turnover their fleets of Stage 2 aircraft. It appears that the DRAFT EIS still considers a recommendation for mandating Stage 3 aircraft. That would mean turnover of entire fleets not just one or two planes because all airports in the state would expect the same treatment. A rebound of visitors and a growth in the economy may allow for such a mandate, but not today and not in the immediate future. Therefore, unless a cost analysis is done that would prove the interisland carriers are fluid enough to make this turnover, we do not feel it is a viable alternative at this time.

A nighttime curfew on cargo would effect local businesses who depend on nighttime deliveries for time sensitive and perishable goods. We believe a better solution would be to look to other cargo carriers who could move cargo during daytime hours. However, that would add to daily air traffic and as we already know, that traffic is increasing on regular basis. Additionally, the ability for a larger plane to land would allow more cargo space in the belly of the plane which could increase our cargo lift and offer another possibility to move cargo during the daytime hours.

 A Chapter of the Hawaii Hotel Association

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Other issues of noise regarding attenuation, insulation, and air conditioning of homes are offered as alternatives in the EIS and we support those alternatives. We do not believe that the small community of Sprecklesville represents the majority on Maui and therefore should not dictate whether or not a project of infrastructure should be put in place. We are pleased to see their concerns addressed in the EIS and alternatives offered. The project should however, address the majority and it seems to do that.

The introduction of alien pests and species is of great concern to the visitor industry. We know our visitors come to see the culture, the beauty and the majestic views of our island. Therefore, this is an area that we must pay special attention to. Once again, however, it is not a reason to stop or delay the project. We believe that we have some powerful lobbying groups on our island that we can work with our state and county legislators to ensure that our airport is safe and as "restrictive" as we can make it. Already this year the state legislature has passed bills that will put dollars into the coffers of the Department of Agriculture. One of our Congressional leaders only last week held a conference on this issue and will work to gain money from the federal level for increased inspections. We understand an EIS is not meant to mediate our concerns, but we welcome ideas from the Department of Agriculture about how to deal with the issue of alien pests and species. It's a known fact pests arrive somehow today, this project offers the opportunity to broaden our awareness and put measures into place to control introduction.

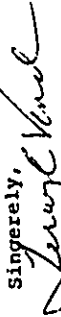
Finally, if we turn our attention to the EIS chapter 4 that discusses "NO ACTION" we find that our present situation will worsen in every way unless we make steps to improve it. We can't stop people from coming. We can make it more costly and inconvenient, but we can't stop them. Air traffic this summer is picking up from 72 to 85 flights a week. A longer runway would improve the flow of air traffic and lessen the possibility of a mishap with crowded skies. We know that alien pests and species have come to Maui and will continue to come anyway, so why not seize this opportunity to put customs and inspections in place in a proper way. We know that noise is a problem in the Sprecklesville area, but it won't improve unless we deal with the alternatives offered.

See Comment #1-2

See Comment #1-3

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In summary, as we weigh the positive against the negatives of this infrastructure project, we feel this is an opportunity to look and to prepare for the future. Why build another three lane highway to Pukalani? Lets do it right the first time. Lets prepare for the future not yesterday. If everything remains status quo we haven't done anything to better the lives of those who live with the noise, to take any further steps to ensure the control of pests and plant species, nor have we done anything to help the County of Maui progress. According to the forecasts to given in the Draft EIS, the present facilities are inadequate to ensure safe, efficient, economical and convenient air travel to Maui. As a thriving community, we cannot turn our backs on efficiency, safety and opportunity?

Sincerely,

Terry J. Vencel
Executive Director

DEANAMUJI CAVENTINO
DIRECTOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

Ms. Terry J. Vencel
Executive Director
Maui Hotel Association
1325 Lower Main Street, Suite 103
Wailuku, Hawaii 96793

Dear Ms. Vencel:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 1, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MHA-1 - Aircraft Generated Noise

We appreciate your support for the Proposed Project and your comments regarding potential alternatives to lessen aircraft generated noise in sensitive areas such as Sprecklesville. The State Department of Transportation (HDOT), Airports Division, as you are aware, has no control over the types of aircraft used by the airlines. However, we can recommend flight paths and hours of operation to lessen noise in sensitive areas. As never aircraft are employed in the interisland and overseas airline's fleets, some noise reductions will occur. We agree that more daytime air cargo flights would be preferable to nighttime flights. The use of other air cargo carriers is, however, a business decision over which we have no control.

COMMENT MHA-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.1.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP

KAUAIYASHIDA
DIRECTOR
MAUI DIRECTORS
GLENN D. DUNN
Brian K. Minnaal

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Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOF is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOF initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOF issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOF. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations, general economic conditions, and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended

Ms. Terryl Venci
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that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOF have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT MHA-3 - No-Action Alternative

We agree, now is the time to implement the Proposed Project. We are attempting to do everything possible to minimize and/or eliminate potential adverse effects of the Proposed Project and this will take help from the business community as well.

If you have any questions, please contact Ben Schlepak, Head Planning Engineer, of our Airports Division at (808) 838-8621.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

KAWAEO CONSTRUCTION
375 KAWAEO ROAD
HAIKU, HAWAII 96708

TEL (808) 572-1219 FAX (808) 572-6048
LICENSE # BC 20079

May 22, 1996

Mr. David J. Wellhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850

Dear Mr. Wellhouse,

I am writing in regard to the proposed Kahului airport expansion,
and its terribly deficient Environmental Impact Statement.

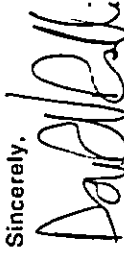
There are multiple omissions in that document that must be addressed.
The statement that the runway will not affect alien species infiltra-
tion is simply not true. The facts are that 3 to 4 harmful insect pests are
already introduced to Hawaii each year and these numbers would increase
with airport expansion. This does not include weeds, or plant and human
viruses. Attached you will find a reprint from the New York Times
attributing the spread of dengue fever to air travel, and an article from
Islands Pacific Business about the devastation of taro crops in Samoa by
Leaf Blight.

The EIS does not consider the social impacts of airport expansion,
something I have witnessed firsthand: I grew up in Palau, a once idyllic
island in the Western Carolines and remember 40 years ago greeting the
flights of the 18 passenger SA-16 from Guam. It was a weekly family
event. The flights eventually became bi-weekly, then daily, with larger
planes, until today there are direct flights from the Philippines and Japan.
The airport expansion caused irreparable reef damage from the massive
runoff and siltling. Villagers could no longer fish from their front doors;
they would now have to travel farther to fish, which required boats and
outboard motors and jobs to buy these things. They relocated to the

district centers seeking work, abandoning their families and traditional
leadership roles in the village. Children fell prey to alcohol and drugs,
now easily available with the direct flights. There is presently an "ice"
epidemic in Palau, with all its attendant problems of crime and family
deterioration, solely because of the direct flights from the Philippines
and easy availability of the drug. The frightening part is that no one was
able to predict these things.

It will be argued that this microcosm does not apply to Maui because of
differing social circumstances, etc., but the lesson is that communities,
especially islands, are fragile systems and cannot bear such significant
changes without serious degradation. The proposed airport expansion is a
significant change and has the potential to result in problems we cannot
even imagine. I hope I do not have to witness such sad problems for a
second time.

Sincerely,



David Vitarelli

copies:

1. Owen Miyamoto
2. Office of Environmental Quality Control

enclosures



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813 5097

MAQUILATONA
DIRECTOR
IN CHARGE
OFFICE OF THE DIRECTOR
OF TRANSPORTATION
HONOLULU, HAWAII

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candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

Mr. David Vitarelli
Kawelo Construction
375 Kawelo Road
Haiku, Hawaii 96708

Dear Mr. Vitarelli:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 26, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT DV-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

Mr. David Vitarelli
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regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT DV-2 - Reef Damage

The potential effects of the Proposed Project on the marine environment are discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project has the potential to affect the marine environment through effects on water quality and by increasing sediment loading in the nearshore environment. However, the mitigation measures to be implemented during construction activities, such as the construction of erosion control and sediment retention basins, will prevent large influxes of sediment flowing into the airport area drainage system or Kailua Gulch. Consequently, the Proposed Project is not expected to affect the marine biota in the reef area off Kahului Airport.

COMMENT DV-3 - Social Impacts of Proposed Project

The socio-economic and growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary Induced Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

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The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project;
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to

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locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential, maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOR's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



Conservation Law Project

123 Toward Street, Ste 200 • San Francisco, California 94107
(415) 536-1992 • Fax (415) 536-1994

Messrs. Welhouse and Miyamoto
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Draft Environmental Impact Statement ("DEIS") for the Proposed Expansion of Kahului Airport on the Island of Maui ("Proposed Project"). After nearly ten years of planning, and two failed attempts to comply with state and federal environmental laws, Hawaii-DOT and the FAA now have produced a five-volume DEIS, including thousands of pages of text and tables. It has taken three years of effort by Hawaii-DOT and the FAA to produce this latest Draft EIS; yet, the public has been given but six weeks to review and comment on this enormous document. Only the minimum, statutory comment period of 45-days has been provided for review and comment on the Draft EIS. The inadequacy of this period is clearly evidenced by the number of persons who testified at the May 8, 1996 public hearing that the DEIS was too long and complex to review in just three weeks. The public, after all, had not been included before the Draft was issued; Hawaii DOT and FAA offered a single public scoping hearing -- held over two years ago.

This gross lack of public involvement in the airport project environmental review process is contrary to the express intent of the National Environmental Policy Act, 42 U.S.C. § 4371 et seq. ("NEPA"), the implementing regulations of the Council on Environmental Quality, 40 C.F.R. § 1500.1 et seq., the Hawaii Environmental Policy Act, Chapter 343 of the Hawaii Revised Statutes ("HEPA"), and FAA Order 5050.4A. Public participation is an essential part of the NEPA process. See 40 C.F.R. § 1506.6 ("Agencies shall make diligent effort to involve the public in preparing and implementing their NEPA procedures."); FAA Order 5050.4A, ¶ 18, 91 ("An effective opportunity to comment at appropriate stages in the decisionmaking process shall be provided to communities, citizen groups, and other individuals affected by airport proposals submitted to the FAA. . . . Time limits [for public comment] shall take into account the magnitude and complexity of the statement and degree of public interest in the proposal."). Thus, in accordance with the mandate of NEPA, HEPA, and the FAA Order, an extended review public review period is appropriate here and would contribute to a greater level of public involvement and understanding of the airport project -- a project that has generated over a decade of nearly unprecedented public concern.

Instead, the May 23, 1996 deadline offered just forty-five days in which to review this multi-volume, complex document which purports to cover federal NEPA requirements, state HEPA requirements, and various federal, state and local permitting requirements, including zoning and local plan amendment, federal Coastal Zone Management Act consistency, state and federal water pollution permits, and biological assessments. It is clearly unreasonable to expect the public to review, digest, evaluate and comment on such a multi-faceted document in such a short

May 23, 1996

Mr. David J. Welhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Box 50244
Honolulu, Hawaii 96850

Mr. Owen Miyamoto
Airports Administrator
Department of Transportation
Airports Division
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Re: Comments on Draft Environmental Impact Statement for the
Kahului Airport Improvements, March 1995

Dear Messieurs Welhouse and Miyamoto:

On behalf of our client, the National Parks and Conservation Association, we submit the following comments regarding the March 1996 Draft Environmental Impact Statement for the Kahului Airport Improvements:

GENERAL COMMENTS

I. Inadequate Time for Public Review and Opportunity to Comment.

On April 1, 1996, the State of Hawaii, Director of the Department of Transportation ("Hawaii-DOT") and the Federal Aviation Administration, U.S. Department of Transportation ("FAA") submitted for public review and comment a

Messrs. Welhouse and Miyamoto
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period of time. Moreover, critical supporting documents were unavailable for public review during the comment period. For example, the Update of Hawaii Aviation Demand Forecasts, October 1994, is a document heavily relied upon in the DEIS, yet could not be obtained by the public for review. Despite a written request submitted by hand to the Hawaii-DOT Honolulu Office on May 15, 1996, we have not received a copy of this critical document.

Given the extraordinary public interest in the airport project and the significant public controversy that surrounds it, a forty-five day public comment period is insufficient and should be extended to allow ample opportunity for a complete review of the DEIS and all supporting documents.

II. The Draft EIS Must Evaluate the Impacts on Haleakala National Park from the Introduction of Alien Species.

In clear violation of NEPA, HEPA and other federal and state laws, the DEIS fails to consider a number of significant environmental consequences resulting from the airport expansion project. In particular, the DEIS fails to address the well-documented potential adverse impacts of the introduction of alien species on Haleakala National Park, and the Island's other native ecosystems.

The expansion of Maui's Kahului Airport will result in increased air traffic, larger and louder aircraft, and, for the first time, the arrival of nonstop international flights from Japan and other countries -- providing an open gateway for alien species to exploit Maui's native environment. Absent from consideration in the DEIS is any discussion of the airport's immediate surroundings, the potential for alien species establishment on Maui, and the impacts of such species invasion -- as well as the Island's native plants and animals. The impact of alien species invasion -- as well as numerous other impacts -- are foreseeable consequences of the Proposed Project; and as such, must be fully disclosed and evaluated in this DEIS.

A. Alien Species Invasion is a Foreseeable Consequence of the Runway Extension -- Phase I of the Proposed Project.

NEPA requires that "proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impacts statement." 40 C.F.R. § 1502.4(a). In addition, an EIS must evaluate all environmental consequences of a proposed action, including a full evaluation of

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both direct and indirect effects on the environment. These include effects which occur at the same time and place, as well as all reasonably foreseeable future effects. 40 C.F.R. § 1508.8. Impacts on natural systems, specifically ecosystems, are expressly defined as "effects" under NEPA. Id. Furthermore, NEPA requires that an agency discuss mitigation measures which may avoid, minimize or reduce the adverse impacts of a proposed project. 40 C.F.R. §§ 1508.20, 1508.25.

Despite NEPA's mandate, the Draft EIS inadequately addresses alien species introduction to Maui's environment, resulting from the expansion of Kahului Airport. The DEIS correctly states that alien species invasion is an existing State-wide problem. DEIS, p.3-99. And, it recognizes that alien species may be introduced through other ports of entry in the State, not just through Kahului Airport. DEIS, p. 5-11. The DEIS also states that other federal and state agencies have already studied this issue and points to the Alien Species Action Plan ("ASAP"). DEIS, p. 3-98. However, none of these claims limit the requirement under NEPA that the Draft EIS fully evaluate all foreseeable impacts of the Proposed Project -- including the impacts of alien species.

It is undeniable that non-native species introduction is a foreseeable consequence of the extension of runway 2-20 to 9,600 feet. The Proposed Project is aimed at allowing economically viable, direct international flights into Kahului Airport -- flights capable of introducing alien species into Maui's ecosystem. While denying that overseas/international flights will immediately increase upon extension of runway 2-20, DEIS, p. 8-4, the DEIS elsewhere admits that "by providing additional runway length and a strengthened runway, the Proposed Project will permit the Airport to better accommodate . . . future international hubs." DEIS, p. 2-22. In fact, "[o]ne of the main objectives of the Proposed Project is to develop . . . in Phase I of the Master Plan -- an airfield which would allow for long-haul aircraft operations." DEIS, p. 4-47. The proposed 9,600 foot runway length offers the flexibility of aircraft operational range to distant destinations with economical payloads. DEIS, p.4-37.

The alternatives analysis also confirms that the runway extension is expressly aimed at accommodating non-stop, international flights. Chief among the list of "deficiencies" associated with the No Project alternative is the failure to alleviate "the existing weight penalties for the overseas aircraft." DEIS, p. 4-1. In rejecting Alternative 2, which provides for a shorter extension of Runway 2-20, the Draft EIS states that "its principle deficiency is that the 8,500 foot runway length is not long enough to provide for direct non-stop flights of Class D (DC10 and L-1011)

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aircraft to all visitor markets, including . . . potential future international destinations." DEIS, p.4-17.

Citing an already completed forecast, the Draft EIS specifically estimates that international flights will bring in 6.4% of the total number of passengers by 2010. "The forecasts assume that most of the direct international flights would originate and terminate in Japan." DEIS, p. 8-4. More importantly, however, the DEIS omits the basis for this assumption -- that, since at least 1990, JAL has been authorized by a Treaty between the governments of the United States and Japan to operate direct flights from Japan into Kahului Airport.¹ Moreover, a letter dated September 18, 1990 to Hawaii-DOT, from its consultant, White, Belt & Collins, acknowledges that "it is not clear what would happen in a situation where a carrier has been granted permission to land at a particular airport where foreign arrival facilities are not available, but there is a possibility that the State Department might insist on staffing facilities if they are needed to implement an agreement." The DEIS similarly states that Hawaii-DOT cannot discriminate against any aircraft that wishes to use the Airport." (DEIS, p. 8-3). In other words, neither Hawaii-DOT nor FAA have control over when and if international flights will be permitted into Kahului. In a motion filed before the Honorable E. John McConnell, Hawaii-DOT admitted that, "The State has no authority to permit or deny international flights at Kahului Airport." See Defendant Department of Transportation's Motion for Partial Relief from Stipulation Filed March 12, 1991, Sierra Club, et al. v. Department of Transportation, Civil No. 89-0336(1), Circuit Court of the Second Circuit, State of Hawaii.

The existing runway length of only 7,000 feet, which prevents economical, long-range international flights (DEIS, p. 8-5), is apparently the only barrier to entry of international flights into Kahului Airport. Thus, the extension of runway 2-20, part of Phase 1 of the Proposed Project, will produce an airport capable of accommodating economical direct flight operations by international carriers. And, without the authority to deny these carriers permission to use Kahului Airport, international flights -- and the necessity to build a facility for Federal Inspection

¹ Critical to the evaluation of existing conditions and foreseeable future impacts, JAL's existing treaty rights are not disclosed in the DEIS. All existing international carrier authorized flight routes, as well as all ongoing bi-lateral discussions aimed at establishing future routes into Kahului Airport, must be fully disclosed in the DEIS.

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Services to handle such flights -- are not only reasonably foreseeable -- they are imminent consequences of the runway extension. The DEIS, therefore, cannot postpone environmental review of these effects.

B. The DEIS Improperly Segments the Proposed Project Resulting in an Incomplete and Inaccurate Evaluation of All Environmental Consequences of the Project.

Even if it were true, as set forth in the DEIS, that "internationalization" of the Kahului Airport would not occur until the year 2010 or later, when a full Federal Inspection Services and associated facility are planned and designed (DEIS, 3-48-49), NEPA requires that the impacts of such "internationalization" be fully evaluated in this DEIS. "[T]here are situations in which an agency is required to consider several related actions in a single EIS." Klepps v. Sierra Club, 427 U.S. 390, 409-410 (1976). "Not to require this would permit dividing a project into multiple 'actions' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." Thomas v. Peterson, 733 F.2d 754, 758 (9th Cir. 1985). The DEIS clearly describes the Proposed Project as that "recommended in the 1993 Kahului Airport Master Plan," (DEIS, p. 1-12), and asserts that the scope of the EIS includes three phases of airport development projects planned to take place within the next 15 to 20 years. In a single sentence, however, the DEIS improperly removes from consideration the parallel runway, relocation of the helicopters, fuel supply pipeline and the transient aircraft apron -- based on the fact that these projects will be built in 15 or more years. (DEIS, p. 1-13).² Relegated to Section 8.0 of the DEIS, entitled "Other Related Issues", international flight operations are also improperly and inadequately discussed as outside the scope of the EIS.

1. Connected Actions

Improper segmentation or "project splitting" has been discussed by the courts as violating a number of requirements of NEPA. Most often, whether a project has been unlawfully divided into smaller, lesser projects centers on the definition of

² See Section III, *infra*, for a comments regarding the unlawful segmentation of these "Phase 3" projects and the resulting inadequacy of the DEIS.

See Comment KLV-3

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asserts that the Project's Phase 1 aim is an airfield which would allow for long-haul aircraft operations. DEIS, pp. 2-22, 4-47. Furthermore, the DEIS admits that "Kahului Airport would ultimately need a runway of sufficient length to permit economical direct flight operations by international air carrier aircraft" -- and provides that length in Phase 1. DEIS, p. 8-5. Also, the No Project alternative is rejected for its failure to alleviate "the existing weight penalties for the overseas aircraft." DEIS, p. 4-1. Other alternatives are rejected for proposing runway lengths not long enough to provide for direct non-stop flights of Class D aircraft to all visitor markets, including potential future international destinations. DEIS, p. 4-17. Finally, economical international flight operations cannot proceed without the runway extension. DEIS, p. 8-5.

Therefore, according to the express provisions of NEPA and Ninth Circuit law, the DEIS must evaluate all "connected" actions, including internationalization of Kahului Airport, and its environmental effects.

2. Cumulative Actions

Federal NEPA regulations also require that "cumulative actions" be considered together in a single EIS. 40 C.F.R. § 1508.25(a)(2). "Cumulative actions" are defined as actions "which when viewed with other proposed actions have cumulatively significant impacts." *Id.* A "cumulative impact" is defined as an impact "which results from the incremental impact of the actions when added to other past, present, and reasonably foreseeable future actions regardless of what agency . . . or person undertakes such actions." 40 C.F.R. § 1508.7. Both connected actions and unrelated, but reasonably foreseeable actions, may result in cumulative impacts. *See the Yaak, supra*, at 721.

The impacts of alien species invasion is acknowledged in the DEIS as a significant cumulative impact. DEIS, p. 5-11. In fact, the DEIS acknowledges that the introduction of alien species by direct overseas flights is a major concern -- especially considering Maui's more sensitive environment. The protection of Maui's environment against alien pests that could be introduced by the arrival of direct overseas flights hinges on measures of control taken by state and federal agricultural inspection services. DEIS, p. 8-8. Yet, none of these measures are discussed or analyzed in the DEIS. The document admits that Kahului Airport must have modern inspection facilities with stringent operational standard to protect Maui's sensitive agricultural environment -- but it offers no analysis of the location, design or funding for such facilities. DEIS, p. 8-9.

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"scope" or "the range of actions, alternatives and impacts to be considered in an environmental impact statement." See 40 C.F.R. § 1508.25. This section requires that a single EIS consider connected actions, cumulative actions, similar actions, alternatives (including a no action alternative and mitigation measures), and impacts (including direct, indirect and cumulative impacts). *Id.* Specifically, the regulations define "connected actions" as actions that:

- (i) Automatically trigger other actions which may require environmental impact statements.
- (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.
- (iii) Are interdependent parts of a larger action and depend on the larger action for their justification." *Id.*

In *Thomas, supra*, the Ninth Circuit concluded that logging operations and the construction of a logging road were "connected actions" which, accordingly, must be evaluated in a single EIS. In coming to that conclusion, the court considered six factors, including among them, the agency's characterization of the initial action, the stated need for the initial action, the basis for rejection of the "no action alternative," and the dependency of the later action on the initial action. *See, Save the Yaak Committee v. Block*, 840 F.2d 714, 719 (9th Cir. 1988), citing *Thomas, supra*, at 758-59.

Applying these factors, we find that the construction of the runway extension and the internationalization of the Kahului Airport are "connected actions" which must be considered in a single EIS. The DEIS admits that the Proposed Project will permit the Airport to better accommodate future international hubs and

³ The definition of "internationalization" set forth in the DEIS -- "allowing unlimited international flights to be processed at Kahului Airport" -- must be rejected as confusing, if not patently incorrect. In determining when the airport will be "internationalized," the DEIS does not consider the existing forecast indicating when international flights will actually arrive at Kahului, but instead cites to when the staffing of customs and immigration and naturalization services are anticipated to be permanently accommodated at Kahului Airport. DEIS, p. 3-49. By combining these two different impacts -- international flights and construction of inspection facilities -- the DEIS fails to acknowledge -- and evaluate -- the foreseeable impacts resulting from incoming international flights.

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direct flights to and from Tokyo, Taipei, and Hong Kong with profitable payloads." International Flights Facilities Requirements Study, Kahului Airport, January 1989, p. 2-1. The impacts of these facilities -- and the impacts of the introduction of international flights -- must, therefore, be addressed in this DEIS.

III. Improperly Ignored As "Long-Range" Project. The DEIS Unlawfully Omits Analysis of Phase 3 of the Proposed Project and its Significant Impacts.

As discussed in Section II, *supra*, the DEIS improperly segments the Proposed Project by removing from consideration Phase 3 of the Proposed Project, including the parallel runway, relocation of the helicopters, fuel supply pipeline and the transient aircraft apron -- based on the allegation that these projects will be built in 15 or more years. DEIS, p. 1-13. "The analysis of the long-range projects (Phase 3 of the Master Plan) will be performed to the extent practicable and feasible. DEIS, p. 2-48. The DEIS asserts that the full impacts of the larger projects in Phase 3 may not be known "because these projects are beyond the year 2000." DEIS, p. 2-48. The year 2000 is 3 1/2 years away -- when will these impacts be known? The proposed actions in Phase 3 -- like the international flights -- are a "connected" actions under NEPA. As such, a full review of the environmental consequences resulting from these projects cannot be delayed.

Upon preparation and approval of a Final EIS, the FAA must (1) decide whether to approve the Kahului Airport Plan and (2) grant or deny Hawaii-DOT's application for federal funding for the whole Proposed Project. The proposed airport improvements, with the exception of the aircraft fuel facilities, will be funded by federal funds through the FAA and state airport funds. Those facilities which are eligible for federal funds will typically be funded at a 75 to 80 percent level. DEIS, p. 2-44. Yet the DEIS would ask that the FAA approve the Proposed Project absent any meaningful evaluation of Phase 3. Evaluation of all environmental consequences associated with the whole, three-phase project cannot properly be delayed until some unknown future time.

The "suggestion that we approve now and ask questions later is precisely the type of environmental blind decision-making NEPA was designed to avoid." *Center v. Burford*, 848 F.2d 1441, 1450-51 (9th Cir. 1988). The courts, particularly the Ninth Circuit, have clearly established that "the governments inability to fully ascertain the precise extent of the effects of [a project] is not, however, a justification for failing to estimate what those effects might be before

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Rather than fully analyze the impacts and mitigation measures appropriate for alien species issue, the DEIS asserts that "the issue will continue to be a problem with or without the Proposed Project." DEIS, p. 5-12. What are the impacts with the Proposed Project? Analysis is not excused because "failure to detect pests could lead to infestation on Maui even under current conditions." DEIS, p. 8-8. That "the impact of alien species is a statewide problem and will not be fully resolved in the EIS" does not dismiss analysis. DEIS, p. 5-12. Under NEPA, the cumulative impact section must fully analyze the combined impact of the past, present, and future alien species problems.

C. Timing

The DEIS asserts that the environmental effects of international flights and alien species will be adequately analyzed and considered in environmental review documents that will be prepared in the future, when the permanent international facilities are constructed. DEIS, p. 8-4. This suggestion has been specifically rejected by the Ninth Circuit: "We believe that consideration of the cumulative impacts after the [project] has already been approved is insufficient to fulfill the mandate of NEPA. A central purpose of an EIS is to force the consideration of environmental impacts in the decisionmaking process." *Thomas, supra*, at 760, 40 C.F.R. § 1501.2 (the NEPA process should begin at the "earliest time possible"); *City of Davis v. Coleman*, 521 F.2d 661, 667-76 (9th Cir. 1975)(EIS for a road must analyze the impacts of industrial development that the road is designed to accommodate). Similarly here, the EIS for a runway extension must consider the impacts of the international flights it is designed to accommodate.

Nor can the agency escape compliance with the regulations by proceeding with one action while characterizing the others as remote or speculative. *Thomas, supra*, at 760. The arrival of international flights into Kahului Airport is neither remote nor speculative. The *Thomas* court found persuasive the fact that the timber sales were being planned contemporaneously with the road construction. *Id.* at 760. Here, it is clear that international flights are being planned -- both by the airport agencies and international carriers. JAL currently has permission to conduct non-stop flights to Kahului. Since at least 1989, Hawaii-DOT has conducted two feasibility studies on internationalization of Kahului Airport. In order to plan support facilities for anticipated international flights. DEIS, p. 9-5. The 1989 Plan anticipated that, "by July 1992, the 2500 to 3000 foot extension [of runway 2-20] will be constructed and put in place to accommodate direct, wide-bodied international aircraft flights. The resultant 9,500 to 10,000 foot runway will permit

irrevocably committing to the activity." *Id.*, supra, at 1450. Uncertainty about environmental impacts does not obviate the importance of the decision and the necessity to evaluate the environmental consequences of the decision. *Id.*

In contrast to impacts which may actually be speculative or unknown, the Phase 3 activities will result in well-studied impacts, some of which are noted, but not analyzed in the DEIS. Nevertheless, these impacts are summarily dismissed from analysis on the superficial basis that the impact may occur more than 15 years on the future. For example, the DEIS summarizes the impacts from the Proposed Project "without the parallel runway." DEIS, p. 1-14. In evaluating the Socio-Economic Impacts of the Proposed Project, the DEIS states, "there are no significant impacts, without the parallel runway. Therefore, mitigation measures . . . are not required." DEIS, p. 3-48. But the DEIS acknowledges that impacts are known: "There is a potential significant impact in Speckleville, when the parallel runway is constructed. Applicable mitigation measures, if necessary, for the impact of the parallel runway will be discussed in a future environmental document for the parallel runway." DEIS, p. 3-48. "Given that the Proposed Project does not induce growth, (not including the parallel runway) the induced secondary impacts due to growth are insignificant." DEIS, 3-49. "The [noise] impacts may be potentially significant with the parallel runway." DEIS, p. 3-13. The suggestion that any aspect of Phase 3 is too speculative or vague to analyze is rebutted by the very fact that the DEIS repeatedly finds that significant impacts will result from Phase 3. These identified and anticipated impacts must be addressed in this EIS.

Moreover, tiering is inappropriate here. FAA Order 5050.4A warns that care must be exercised when tiering not to separate actions which are functionally related and have no independent utility. § 101(b). The phases are interdependent and functionally related. For example, Phase 2 includes the land acquisition for the parallel runway planned for Phase 3. DEIS, p. 2-30. Certainly the acquisition of 520 acres of land to the east of the airport-- at a cost of over \$8.7 million -- has no utility independent of the Phase 3 parallel runway development. Under NEPA, tiering is appropriate when it helps the agency exclude issues not yet ripe. 40 C.F.R. § 1508.28. Here, each phase of the Proposed Project is ripe for review -- and funding. Almost without exception, every action in each phase of the Proposed Project has been designed, studied, sited and priced. DEIS, Section 2.0.

As connected actions, cumulative actions, or unrelated, but reasonably foreseeable actions, NEPA plainly requires that all impacts associated with each phase of the Proposed Project be fully evaluated in this DEIS.

IV. The Proposed Project Requires Formal Consultation with the U.S. Fish and Wildlife Service in Accordance with the Endangered Species Act.

The Proposed Project poses many threats to Maui's endangered and threatened species. The DEIS discussion and analysis of these impacts is entirely inadequate -- failing to look beyond the airport property line.⁴ Boundary demarcations are not recognized by plants and animals. Thus, particularly in the context of a small island, such as Maui, the potential impacts on endangered and threatened species mandates an evaluation of island-wide consequences resulting from the Proposed Project.

Section 7 of the Endangered Species Act ("ESA") requires the Secretary of the Interior to ensure that an action of a federal agency is not likely to jeopardize the continued existence of any threatened or endangered species. 16 U.S.C. § 1536. Provisions of the ESA and the regulations promulgated thereunder mandate a process of consultation with the US Fish and Wildlife Service ("USFWS") whereby a "biological opinion" evaluating the nature and extent of jeopardy posed to species affected by the agency action. *Id.*, 50 C.F.R. § 401.25. After initiation of consultation, the agency shall not make any irreversible or irretrievable commitment of resources with respect to the agency action which has the effect of foreclosing the formulation or implementation of any reasonable and prudent alternative measures. *Id.* The DEIS makes no reference to consultation with USFWS nor any biological opinions required under the ESA. Thus, the Proposed Project fails to comply with this federal law.

Alien Species. The expansion and internationalization of the Maui Airport will be a significant source of introductions of non-native life forms likely to damage the endangered, threatened and candidate species on Maui. Rejecting the conclusions of the DEIS, p. 3-100, the USFWS and the National Park Service have concluded that there will be a potential increase in the rate and diversity of alien species introductions to Maui as a result of the Proposed Project. According to USFWS, the initiation of direct flights from Asia and/or Pacific nations will provide

⁴ These comments in Section IV are equally applicable to the inadequate evaluation in the DEIS of the impacts on all biotic communities and wetlands in Sections 3.11 and 3.12.

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an entrance route for organisms directly to Maui with potential island-wide consequences. The National Park Service also confirms that construction of airports allows alien species introduction and that airport design is a critical factor in determining whether or not quarantine is effective. Accordingly, the impacts of alien species must be fully evaluated under the mandate of the ESA.

Effective and concrete mitigation measures including, but not limited to, an evaluation of the Airport's surrounding area and its conduciveness to the survival of alien species likely to arrive on aircraft, quarantine and inspection procedures necessary to reduce the likelihood of alien species introductions, and monitoring and contingency action plans for locating and eradicating potentially harmful alien species which escape the inspection procedures.

Kanaha Pond. The Kanaha Wildlife Refuge, which lies adjacent to the airport boundary, is home to many native Hawaiian rare and endangered birds. In addition to other impacts, the Refuge is seriously threatened by the proposed increase in air traffic noise. Contrary to the study relied upon in the DEIS, Appendix J, prior studies conducted by scientists from Hawaii Department of Land and Natural Resources have concluded that the overflights at Kanaha Pond do adversely impact endangered species there.

Additionally, the proposed airport expansion threatens to degrade water quality which is likely to drain into the ponds and wetlands at the airport. In fact, the USFWS has called for a strict review of the proposed drainage plan which may send runoff from landing strips and other improvements into adjacent wetland areas. The DEIS, however, fails to analyze this impact.

Hawaiian Stilt. Already a problem at Kahului Airport, approaching planes often strike and kill endangered and threatened birds that often forage in the wetlands on the airport property. As air traffic increases, so will the number of bird deaths. The DEIS states -- without analysis, explanation or attachment -- that Hawaii-DOT will, subject to its taking permit, haze the Hawaiian Stilts from the airport and undertake operational and maintenance measures to lessen the attraction of the airfield DEIS, at 3-95. This conclusory statement fails to provide any basis to support the conclusion that the Stilts are not jeopardized by the Proposed Project.

Accordingly, any agency action regarding the proposed airport expansion will be a violation of the ESA, *unless and until* the U.S. Fish and Wildlife Service, in

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compliance with Section 7 of the ESA, issues a Biological Opinion analyzing whether this Project is likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of the critical habitat of these species and determining all reasonable and prudent measures.

V. The Proposed Project is An Unlawful "Use" of Park Lands, Causing Significant Impacts on Natural Resources.

The Department of Transportation Act and the Airport and Airways Improvement Act prohibit approval of any federally supported transportation project which requires the "use" of any publically owned land from a public park or which may have a significant impact on natural resources, unless there is no feasible and prudent alternative and all reasonable steps have been taken to minimize such adverse effect. Specifically, Section 4(f) of the Department of Transportation Act states:

The Secretary of Transportation shall cooperate and consult with the Secretaries of Interior, Housing and Urban Development, and Agriculture, and with the States, in developing transportation plans and programs that include measures to maintain or enhance the natural beauty of lands crossed by transportation activities or facilities.

(c) The Secretary may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title 23) requiring the use of publically owned land of a public park, recreational area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State or local significance (as determined by the Federal, State or local officials having jurisdiction over the park, area, refuge or site) only if:

- (1) there is no prudent and feasible alternative to using that land, and
- (2) the program or project includes all possible planning to minimize harm to the park, recreational area, wildlife and water fowl refuge, or historic site from the use.

49 U.S.C. § 303(c). Similarly, when section 509(b)(5) of the Airport Act is applicable, the FAA shall authorize no project under the Airport Improvement Program involving airport location, a major runway extension, or runway location found to have a significant adverse effect unless the agency shall render a finding in

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writing, following a full and complete review, that no feasible and prudent alternative to the project exists and that all possible steps have been taken to minimize such adverse effect." FAA Order 5050.4A, ¶ 83. "The environmental impact statement must include sufficient information to support such a conclusion where applicable." Id.

The DEIS cover page states that "the DEIS is submitted pursuant to . . . Section 509(b)(5) of the Airport and Airway Improvement Act of 1982, as amended," and the DEIS recognizes some (and fails to recognize other) potential significant adverse impacts to the environment. Yet, no information is included in the DEIS to support a conclusion that no feasible and prudent alternative to the project exists and that all possible steps have been taken to minimize the adverse effects. Thus, approval of the Proposed Project is unlawful under the Airports and Airways Improvement Act.

Section 3.9 of DEIS, on the other hand, does discuss Section 4(f) of the Department of Transportation Act, however inadequately. Impacts to Haleakala National Park are summarily dismissed "due to the distance of the Park from Kahului Airport." DEIS, p. 3-81. In determining whether the impacts on a particular park or refuge is considered a "use" under section 4(f), the Ninth Circuit has explained that distance is not a key factor. Alder v. Lewis, 675 F. 2d 1085 (9th Cir. 1982). The term "use" is to be construed broadly to include off-site areas significantly adversely affected by the project. Id., citing, D.C. Federation v. Volpe, 459 F.2d 1231, 1239 (D.C. Cir. 1975), cert. denied, 405 U.S. 1030 (1972). Thus, where a park's utility or importance as a site would be impaired," Section 4(f) is triggered. Alder, supra, at 1091-92. As demonstrated in comments submitted by USFWS and the National Park Service, the potential impact on Haleakala National Park, Kanaha Pond, and the entire Maui ecosystem from alien species invasion fall well within the definition of "use." Moreover, the noise and water drainage impact on the natural flora and fauna at Kanaha Pond will also result in a "use" under Section 4(f).

Compliance with the rigorous resource protection requirements of Sections 4(f) and 509(a)(5) include a duty to avoid the project and its impacts entirely unless there is "no prudent and feasible alternative" to "use" of the land, and, if the proposed project is pursued, a duty to use "all possible planning to minimize harm" and "all reasonable steps" to protect the natural resources. Thus, the conclusion in the DEIS that no mitigation measures are required is totally inaccurate. DEIS, p. 3-81. In fact, the FAA must choose a reasonable and prudent alternative to the expansion and internationalization of the Kahului Airport in order to avoid the

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potential adverse impacts on Haleakala National Park and Maui's other natural resources.

SPECIFIC COMMENTS

The following comments address the individual sections of the DEIS, unless already discussed under the General Comments section. These comments are intended to supplement those already discussed in the General Comments section, and should not be construed to limit the scope of the General Comments. Additionally, the comments submitted by Isaac Davis Hall, the National Park Service and the U.S. Fish and Wildlife Service are hereby incorporated herein by reference.

Litigation (Section 1.2.3; Appendix B) It appears that the DEIS fails to address a number of the items specifically required by the Court Orders, subjecting this document to additional legal challenge.

Cooperating Agency (1-9) The National Park Service was improperly denied cooperating agency status. A scant 10 miles from Haleakala National Park, Kahului airport poses a very real threat from the introduction of alien species capable of destroying entire ecosystems in a matter of just a few years. Any Federal agency which has special expertise with respect to any environmental issue, which should be addressed in the statement may be a cooperating agency. 40 C.F.R. § 1501.6. The National Park Service, in fact, has the highest level of "special expertise" relevant to the impact of alien species introduction into Maui's fragile ecosystem. The National Park Service at Haleakala National Park has decades of experience in preventing the spread of already existing alien plants and animals established on Maui -- both inside and outside the Park's boundaries. Nevertheless, the FAA refused to recognize the National Park Service as a cooperating agency.

Partially a result of the FAA's missed opportunity to consult closely with experts at Haleakala National Park, the FAA drafted and released an inadequate EIS which fails to meet even the most basic requirements of federal law.

Proposed Project (1-12) The project description must be accurate and consistent throughout the DEIS. The project is inappropriately segmented into three phases, resulting in a confusing and inconsistent project description which is legally inadequate.

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Facilities Not Analyzed in the EIS (Section 1.5.2) Several elements of the airport project are identified as excluded from analysis in this section. To the extent, however, that these facilities are existing and/or still being developed, the DEIS must consider the cumulative effects of these projects combined with the Proposed Project. For example, the Aircraft Rescue and Fire Fighting Station (ARFF) was apparently completed in November 1991, but the DEIS fails to consider the cumulative impacts of the ARFF and the airport project. And, the ARFF Training Facility is not yet built, but is still in the design stage, yet the impacts of this facility have not been evaluated in combination with the Proposed Project. Thus, the DEIS must fully evaluate the impacts of these projects on air quality, water quality, land use, hydrology and drainage, hazardous/toxic waste and wastewater, and other resources.

Compliance with FAA Order 5050.4A (Section 1.11) The DEIS does not comply with FAA Order 5050.4A as demonstrated in the General Comments.

Airport Support Facilities (Section 2.2.14) No description of the existing inspection and quarantine facilities.

Infrastructure (2.2.15) No description of the existing hospital/emergency facilities available to accommodate Airport emergencies.

Purpose and Need and Statement of Objectives (Section 2.3) This section inaccurately states the objectives of the Proposed Project. As evidenced in other sections of the DEIS, particularly the Alternatives Section, internationalization and increased level of tourism is a central purpose of this Project. These are other actual purposes must be fully discussed in this section, and evaluated in the DEIS.

Goals and Objectives of the State and County (Section 2.3.1) This section selectively chooses only the most compatible elements of the existing state and local plans, resulting in a skewed and inaccurate analysis of consistency. For example, contrary to the goals of the Maui General Plan, the Proposed Project will disrupt agricultural and social pursuits at the expense of tourism. And, by failing to address the impacts on Maui's native ecosystem, the Proposed Project is not an environmentally sensitive transportation system, as called for in the Plan. These and other inconsistencies must be addressed in the DEIS.

Air Cargo Facilities (Sections 2.4.5, 2.4.6) A 12-acre site has been provided at the west ramp for a new air cargo facility, large enough for 100,000 square feet of storage. A four acre area is similarly planned for the east ramp. The design and

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location of these facilities must take into consideration necessary inspection and quarantine facilities for prevention of alien species introduction.

Proposed Utilities and Drainage Systems (Section 2.4.9) This section inadequately describes the planned drainage system. The detailed design of the stormwater drainage system required for the parallel runway has been improperly omitted from this section.

Project Phasing (Section 2.5) The analysis of the "long-range" projects cannot lawfully be delayed until some undisclosed future date. These planned airport improvements must be fully analyzed in this DEIS.

Noise (Section 3.2) The discussion of noise impacts is inadequate. Ironically, FAA's own comments on Hawaii-DOT's 1992 EIS adequately summarize the problems with this section: "You discuss aircraft noise for the year 2010, when Stage 3 aircraft will comprise 80 percent of the projected aircraft fleet operating at Kahului. You do not, however, discuss noise levels that would occur within the next 5 to 10 year period as this transition occurs. We believe you should analyze the noise impacts for this near-term period. This analysis would provide data to predict noise impacts resulting from a longer runway or parallel runways serving Kahului as its Stage 2 aircraft fleet changes to quieter aircraft." The confusing arrival pattern scenarios appear to inaccurately reduce the estimated noise impacts. This analysis does not comply with FAA Order 5050.4A.

Land Use (Section 3.3) This discussion is improperly limited to the area in and around the Airport property. Because the impacts of the Proposed Project reach far beyond the boundary line -- pervading the entire island -- consideration of land use plans and laws is warranted. In particular, Haleakala National Park property is subject to the mandate of the National Parks Organic Act, 16 U.S.C. § 1611. The National Park Service is subject to an absolute duty, which is not to be compromised, to take whatever actions and seek whatever relief as will safeguard the units of the National Park System. *Id.* And, specifically, the Haleakala National Park enabling legislation emphasizes the need to protect the park's animals and birds from capture or destruction. The DEIS must fully evaluate all potential impacts on land use plans and policies -- including the National Park Organic Act.

Geology, Etc. (Section 3.4) This section fails to consider the proper scope of potential impacts from the Proposed Project. The DEIS underestimates the impacts of runoff on the marine environment.

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STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

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impacts cites the ASAP. Yet, two key elements of the ASAP are not addressed. "[T]he alien species problem is growing rapidly, and existing programs for prevention and control will fail to protect Hawaii without significant improvement." Appendix Q, p. 2. Thus, the ASAP calls for "improvement" effectiveness of inspections through coordination of U.S. Department of Agriculture, U.S. Fish and Wildlife Service, [and other inspection agencies]." The DEIS fails to even address coordination of federal and state inspection agencies and the prevention and control measures necessary to mitigate the threat of alien species invasion.

Air and Water Quality (Sections 3.7 and 3.8) The DEIS fails to adequately analyze the impacts on air quality island-wide. These sections fail to comply with FAA Order 5050.4A, requiring letters of assurance from governor that certificates for air and water quality will be issued. p.34.

Section 4(D). Biotic Communities, Wetlands (Sections 3.9, 3.11, 3.12) As discussed above, these sections are inadequately discussed and analyzed, narrowly construed and insufficiently mitigated.

Hydrology, Floodplain Management and Drainage (Section 3.13) This section fails to fully address the impacts of drainage from the Proposed Project into the marine and terrestrial environments in and surrounding the airport boundary.

Farmland (Section 3.17) This section omits, among other things, the required analysis of the impacts of alien species on Maui's farmland and underestimates the impact of loss of agricultural lands.

Alternatives (Section 4.0) Because the project description is confusing and misleading, this alternative section, particularly the basis cited for rejecting certain alternatives reveals the true purpose of the Proposed Project. The No Action Alternative, Alternative 1 (including no extended runway), and Alternative 2 (including a lesser-extended runway) are each rejected because of their failure to accommodate unrestricted long-range overseas flights, including international flights. Also revealing is Section 4.3.2 analysis, which rejects any runway length incapable of accommodating international flights.

Other alternatives, such as a strengthened runway and extended safety zones are entirely omitted from analysis. But, if correctly evaluated under the alleged project needs and purpose, reasonable and prudent alternatives could be identified which would meet many of the Project's needs -- and avoid certain adverse impacts.

Cumulative Impacts (Section 5.0) As already discussed, this section fails to recognize, evaluate, and mitigate significant cumulative impacts associated with, among other things, alien species impacts, impacts on Parks and other natural resources, impacts from airport internationalization, and impacts from other airport projects improperly excluded from this DEIS. Therefore, the cumulative impact section is inadequate.

Alien Species Action Plan (Appendix Q) The impact analysis for alien species

Instead, the DEIS offers nothing more than cooperation with other agencies and the generation of arrival fees from international passengers as "mitigation." DEIS, pp. 3-101, 5-12, 8-9. These measures are not only inadequate, but illusory. In reality, only 0.6% of such collected fees is spent for inspections of incoming flights. And, while the DEIS claims that support facilities will be provided to assist inspection agencies, no description of the existing facilities and the existing inspection operations, nor any analysis of these alleged facilities is provided. DEIS, p. 5-12. Nevertheless, the DEIS tells us that inspection of international passengers "should not be difficult." DEIS, p. 8-9.

CONCLUSION

NEPA provides that "[i]f a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." 40 C.F.R. § 1502.9(a). As clearly set forth above, the DEIS as currently drafted, fails to meet even the most basic requirements of NEPA and other federal and state laws. Accordingly, the FAA and Hawaii-DOT must revise and recirculate a new DEIS for public review and comment before any aspect of the proposed airport project is approved.

Respectfully submitted,

Nicole Walthall

Nicole J. Walthall
Conservation Law Project
Attorneys for National Parks and Conservation Association

cc: Office of Environmental Quality Control

See Comment NPN-21

See Comment NPN-22

See Comment NPN-23

See Comment NPN-24

See Comment NPN-25

See Comment NPN-26

See Comment NPN-27

See Comment NPN-28



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REPLY REFER TO
AIR-EN
97.1117

August 20, 1997

Ms. Nicole J. Walthall
Conservation Law Project
123 Townsend Street, Suite 250
San Francisco, California 94107

Dear Ms. Walthall:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 23, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT NJW-1 - Time for Public Review and Opportunity to Comment

The subject Draft EIS was prepared in compliance with the National Environmental Policy Act (NEPA) and Hawaii Environmental Act, Chapter 343, Hawaii Revised Statutes (HRS). The initial time frame for public review was 45 days (from April 8, 1996 to May 23, 1996), in compliance with the requirements of NEPA and a longer public review than required under the State Department of Health rules and regulations. At the request of the public, the time for public review was extended for an additional 30 days to June 22, 1996.

There were two scoping meetings held for this EIS as stated in the Draft EIS. The scoping meetings were held on May 18, 1994, at 10:00 a.m. and 7:00 p.m. The public coordination is discussed in Section 1.3 of the Draft EIS. A copy of the "Update of Hawaii Aviation Demand Forecasts" was sent to you on May 22, 1996, seven days after your request. A copy of the "Update of Hawaii Aviation Demand Forecasts" will be included in the Final EIS.

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COMMENT NJW-2 - Impacts of Proposed Project on Haleakala National Park and Introduction of Alien Species

The alien species issue is discussed and analyzed in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the State of Hawaii, Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic or international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is

discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction rate may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction rate of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

The reasons for assuming a Japanese market for international visitors is stated in Sections 3.5, 3.6, 6.0 and 8.2, and Appendix E of the Draft EIS. We disagree that the expansion of Kahului Airport will result in increased air traffic, and larger and louder aircraft. As stated in the Draft EIS, the current airport is presently accommodating direct charter, scheduled and military international flights from Canada and elsewhere. The noise impacts for international flights are discussed and analyzed in Section 8.2 of the Draft EIS. The change in air traffic due to international flights is discussed in Appendix N

of the Draft EIS and used in the analysis in the impact analysis of international flight operations in Section 8.2 of the Draft EIS. Also, refer to response Comment NJW-3 for more information on international flights, and response Comment NJW-13 for a discussion on the Purpose of the Proposed Project.

COMMENT NJW-3 - Segmentation of Proposed Project

The various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and long-term (Phase 3). The categorization of the projects is based on the existing and forecast demand. The Phase 1 improvements are needed to meet existing demands and deficiencies, and the Phase 2 and Phase 3 projects to meet the aviation demands anticipated for the Year 2003-2008 and the Year 2009-2016, respectively. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. As stated in Section 1.5.1, these long-range projects are analyzed in this Draft EIS to the extent possible in order to determine the individual and cumulative impacts as required by HRS Chapter 343 and NEPA. However, given that the construction of these projects will occur, if at all, after the Year 2009, and, more likely near or after the Year 2016, the Draft EIS could provide an impact analysis for foreseeable impacts both individually and cumulatively. At this point in time, any more detailed analysis would be highly speculative and prone to error, for it is very likely that each of these long-term projects will undergo substantial changes over the next ten to fifteen years. For example, the scope, size, location and timing of the projects may be altered should air travel to and from Maui evolve and take shape differently than originally anticipated.

If and when the parallel runway, transient apron, helicopter facilities and fuel pipeline are defined in detail and submitted as projects to be implemented, each will be subjected to a more in-depth environmental review as required by state and federal law, e.g., Environmental Assessments, Findings of No Significant Impacts (FONSIS) or Environmental Impact Statements.

The fact that the Draft EIS cannot provide a comprehensive environmental review of the long-term projects does not mean that the Draft EIS is deficient. Under NEPA, multi-stage projects such as this one can be "segmented" so long as the portions of the project that are fully analyzed in the Draft EIS meet the following criteria: (i) they have substantial independent utility, (ii) they do not foreclose the opportunity to consider

If and when the time approaches that the parallel runway is required to prevent substantial deterioration of service at Kahului Airport, the FAA will prepare the required environmental documentation pursuant to applicable state and federal law addressing the proposed runway's environmental effects. Currently, it is anticipated that Kahului Airport will not require the parallel runway, if at all, until after the Year 2010. Detailed environmental documentation prepared closer to the time when the parallel runway would actually be constructed ensures that the environmental analysis will be more accurate and relevant.

In addition, the State of Hawaii, pursuant to HRS Chapter 343, will prepare its own environmental documents for the long-term, Phase 3 projects at a later date closer to the actual implementation of the project. These documents will be either supplemental to this Draft EIS or independent studies. It is also very likely that this Draft EIS, prepared in 1996, will be considered out of date and unreliable in the Year 2010, thus necessitating the preparation of a new environmental document at that time. Especially, due to the high probability that the long-range actions will change in size, scope, location, or timing.

According to Council on Environmental Quality (CEQ) regulation 1508.28(b), tiering should be used to, "help the lead agency focus on issues that are ripe for decision and exclude from consideration issues already decided or not yet ripe." [emphasis added] Therefore, the Draft EIS focused on the short-term (Phase 1) and medium-term (Phase 2) projects, and deferred detailed analysis of the Phase 3 projects until a later date when they could be defined with greater precision and when the environmental effects could be determined more reliably and accurately.

Due to public concern and as required by the Court-ordered stipulation, the Draft EIS also analyzes the impacts of: (i) realigning, widening and improving Alahao Street and extending it to the northeast to Hana Highway as a road open for public use and providing through traffic along the coastal side of Kahului Airport, and (ii) international flight operations including permanent and temporary (interim) international facilities. Note, however, that permanent international arrival facilities is not part of the proposed project. However, the 1994 updated aviation forecasts, shows that a permanent facility may be needed at the Year 2010 or beyond.

alternatives to the more speculative, long-term projects that will be studied later, and (iii) they do not irretrievably commit federal funds for those projects.

The short-term (Phase 1) and medium-term (Phase 2) projects proposed for Kahului Airport and analyzed in the Draft EIS meet these three criteria. Each has substantial and independent utility. In fact, even if the Phase 3 projects were never implemented, the Phase 1 and Phase 2 projects would still be necessary and would still serve their intended purposes. The Phase 1 and Phase 2 projects also do not foreclose the opportunity to consider alternatives to the Phase 3 project proposals.

It is anticipated that the design, size, timing, location and need for the parallel runway, transient apron, helicopter facilities and fuel pipeline may change in the next ten to fifteen years. Because the Phase 1 and Phase 2 projects possess their own, self-contained utility, they in no way prevent the consideration of alternatives to the Phase 3 projects.

In addition, the Phase 1 and Phase 2 projects do not irretrievably commit federal funds for the Phase 3 projects. Indeed, one of the reasons that the Phase 3 projects is speculative is that federal funding for such airport improvements is not and cannot be guaranteed decades into the future. Because the Phase 1 and Phase 2 projects are independent of the Phase 3 projects, funding for the former does not commit funding for the latter.

The following information is provided to further clarify this issue and discussed in Section 1.5 of the EIS.

It is anticipated that the transient apron will be constructed, if at all, after the Year 2006. It is anticipated that the parallel runway, long-term relocation of the helicopters, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks will be constructed, if at all, after the Year 2010.

The Phase 1 and Phase 2 projects have utility apart from and independent of the parallel runway, transient apron, long-term relocation of the helicopters and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. Similarly, these Phase 3 projects have independent utility and are not reliant on the implementation of the Phase 1 and Phase 2 projects.

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The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

COMMENT NJW-4 - Consultation with FWS

The FAA and HDOT, Airports Division, have been working with the FWS on the potential effect of the proposed project on endangered species within Kanaha Pond Wildlife Sanctuary and on the airfield and is discussed in Section 3.11 of the Draft EIS. The FWS has concurred with our finding of insignificant impact of the

Proposed Project on the endangered species in Kanaha Pond Wildlife Sanctuary. Therefore, a biological assessment or Section 7 consultation was not required. In addition, the FAA and HDOT, Airports Division, worked closely with the FWS and U.S. Army Corps of Engineers on the wetland delineation for the Airport. As stated above in the response to Comment NJW-2, the FAA and HDOT, Airports Division, have worked closely with the

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FWS, the NPS and other organizations on the impact of the Proposed Project on the introduction rate of alien species to Maui. The result of this has been the preparation of the Alien Species Biological Assessment. In connection with the submission of this Biological Assessment, the FAA has requested formal consultation with the FWS and that consultation is in progress. A biological opinion has been prepared and will be included in the Final EIS.

Contrary to your statement, the FWS has asked for cooperation in mitigating ponding areas (not wetlands) which occur at low spots on the airfield after it rains. These ponding areas attract the Hawaiian Stilt to the airfield for feeding and resting purposes. This airfield ponding issue is an existing operational problem and will not be impacted by the Proposed Project. The issue is addressed in Section 3.11.2 of the Draft EIS. The potential impacts to drainage and wetlands are discussed in Sections 3.13 and 3.12 of the Draft EIS, respectively. There will be insignificant impacts to Kanaha Pond Wildlife Sanctuary and the potential impacts are discussed in Section 3.9 and 3.12 of the Draft EIS.

COMMENT NJW-5 - Use of Public Park Lands

The relationship of the Proposed Project to Section 4(f) of the Department of Transportation Act is discussed in Section 3.9 of the Draft EIS. As indicated in the Draft EIS, no publicly owned park land will be adversely impacted by the Proposed Project; impacts to recreation areas will be positive; and the impact of the Proposed Project to wildlife refuges will be insignificant.

There will be no direct impact "use" of the park lands by the Proposed Project. The alien species issue is discussed in the Draft EIS and considered a cumulative significant issue. Haleakala National Park has and is currently impacted by alien species and this situation will not be impacted by the Proposed Project. Also, see response Comment NJW-2 on alien species above.

COMMENT NJW-6 - Litigation

The Kahului Airport Draft EIS has been prepared in compliance with the NEPA, the HRS, Chapter 143 and the Court ordered stipulations of March 12, 1991 and June 2, 1993.

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COMMENT NJW-7 - Cooperating Agency

The Cooperating Agency issue is discussed in Section 1.3.3 of the Draft EIS. Additional information is provided below on cooperating agencies and the NPS request for cooperating agency status.

A cooperating agency may be any federal agency other than the lead agency that has jurisdiction by law or special expertise with respect to the environmental impacts expected to result from a proposal [40 CFR 1508.5; 1501.6]. An agency has "jurisdiction by law" if it has the authority to approve, veto, or finance all or part of the proposal [40 CFR 1508.15]. An agency has "special expertise" if it has statutory responsibility, agency mission, or related program experience with regard to a proposal [40 CFR 1508.26].

On the lead agency's request, any other federal agency with jurisdiction by law or special expertise may be a cooperating agency. In addition, the lead agency may request any other federal agency with special expertise regarding any environmental issue to become a cooperating agency [40 CFR 1501.6]. A lead agency, however, is not required to designate an agency as a cooperating agency; rather, any such designation is discretionary.

Although an agency may not be formally designated as a cooperating agency, that agency may still participate extensively in the environmental review process by participating in the scoping process, developing information to be reviewed and, at the lead agency's discretion, included in the EIS, providing staff support in the EIS's preparation, and requesting a meeting with the lead agency to discuss the agency's concerns [40 CFR 1501.6].

The NPS requested that it be designated as a cooperating agency for purposes of preparation of the EIS for the proposed improvement projects. Although the NPS was not formally designated as a cooperating agency, the NPS participated in the scoping process, and met with the lead agency concerning alien species issues and potential impacts on the Haleakala National Park. The FAA and the HDOF used the environmental analysis and proposals from the NPS to the maximum extent possible in the preparation of the Draft EIS consistent with their responsibilities as lead agencies. As stated above, the NPS played an active role in the preparation of the biological assessment for the Proposed Project. (See response to Comment NJW-2, above)

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COMMENT NJW-8 - Description of Proposed Project and Segmentation
The Proposed Project is fully described in Section 2 of the Draft EIS. The Segmentation Issue is discussed above under Response No. 3.

COMMENT NJW-9 - Facilities not Analyzed

All facilities to be constructed as part of the Proposed Project are described in Section 2.0 of the Draft EIS and their potential impacts are analyzed in Section 3.0 of the Draft EIS. Facilities already constructed and part of the existing airport facilities have been summarized in Section 1.8 of the Draft EIS and their impacts have been analyzed and described in previous environmental documents as required by NEPA and Chapter 343, HRS. These facilities are also analyzed in the cumulative impact section (refer to Section 5.1) or included as part of the existing environment or current condition.

COMMENT NJW-10 - Compliance with FAA Order 5050.4A

The subject Draft EIS was prepared in compliance with NEPA, Chapter 343, HRS, FAA Order 5050.4A, and all other controlling rules and regulations.

COMMENT NJW-11 - Airport Supporting Facilities

Existing inspection and quarantine procedures are described in Section 3.11.3 of the Draft EIS.

COMMENT NJW-12 - Infrastructure

Existing hospital/emergency facilities are discussed in Section 3.22.5 of the Draft EIS.

COMMENT NJW-13 - Purposes and Need for the Proposed Project

The purposes and need for the Proposed Project are discussed in Section 2 of the Draft EIS. As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. That is, the Proposed Project is in response to existing and forecast aircraft activity

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and passenger levels. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT NJW-14 - Goals and Objectives of the State and County

The relationship of the Proposed Project to the state and county goals and objectives is discussed in Section 2.3 of the Draft EIS. As with any infrastructure project, a balance between potentially conflicting goals and objectives must be reached. The lands to be taken out of agriculture will not significantly affect the overall agricultural production of the island and the airport facilities to be constructed will provide better agricultural cargo handling facilities for diversified agricultural operations on the island. Similarly, the socio-economic factors associated with the Proposed Project are expected to be generally positive in that new employment opportunities will arise from the construction of the facilities and new businesses that are expected to develop as a result of the forecast increases in passenger levels and aviation activity.

COMMENT NJW-15 - Air Cargo Facilities

HDOT, Airports Division, is committed to allowing both the U.S. Department of Agriculture and Hawaii Department of Agriculture participate in the planning and design of the new cargo facilities. In this manner, the inspection and quarantine requirements of both agencies can be designed and constructed into the new facilities.

COMMENT NJW-16 - Proposed Utilities and Drainage Systems

The design of utilities, drainage systems and other facilities will be in compliance with state and county building standards. Prior to construction, the detailed design drawings will be submitted to the proper authorities for permit purposes as required by law.

COMMENT NJW-17 - Project Phasing

See response to Comment NJW-3, above.

COMMENT NJW-18 - Noise

The Noise Compatibility Program Report, September 1995, was included in the noise analysis of the Draft EIS which shows the noise exposure maps for 1993 and 1998 (with the runway

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extension). The noise maps are presented in Appendix O in the Draft EIS. As requested, these noise maps are included in Section 3.2 of the Final EIS. The noise analysis in the Draft EIS, included a noise impact analysis for both Stage 2 and Stage 3 aircraft on a Single Event Noise Exposure Level (SEL) for a detailed analysis of specific aircraft. As can be seen on the noise exposure maps, the SEL and the EIS noise analysis, the Proposed Project, without the Parallel Runway will have little or positive effect on noise sensitive areas within the Airport Environs.

The arrival tracks shown for the parallel runway were developed as a possible scenario for the flight tracks for the operation of the airfield with the parallel runway. The actual flight paths for the parallel runway are too speculative and cannot be accurately ascertained at this time. Many factors are not known, including the actual mix of aircraft, the number of aircraft operations and surrounding land use.

No specific comment was provided regarding why the commentator believes the analysis does not comply with Section 5050-4A, therefore, no further response can be provided.

COMMENT NJW-19 - Land Use

The Draft EIS discusses those lands within the immediate vicinity of the airport that will be directly affected by the Proposed Project. Indirect impacts to other lands, including Haleakala National Park are discussed in other sections of the Draft EIS. For example, the HDOT, Airports Division, has been working in cooperation with NPS, as well as FWS, other state agencies and private groups regarding the issue of inadvertent introductions of alien species onto Maui as a result of future potential increased air traffic into and out of Kahului Airport. In this regard, as a result of meetings with the NPS and the FWS, the FAA and HDOT, Airports Division, have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment was prepared in order to determine the potential impact of the runway extension (of the Proposed Project) on the introduction rate of alien species at Kahului Airport. Based upon the analysis in the biological assessment, and as necessary, appropriate mitigation measures that are reasonable, feasible and prudent were identified. A copy of the biological assessment is included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS.

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COMMENT NJW-20 - Geology

We believe the Draft EIS adequately discusses the potential effects of the Proposed Project on or by geology, physiography, soils, agricultural potential and earthquakes. The runoff impacts on the marine environment is discussed in Section 3.8 of the Draft EIS. These topics are discussed in Section 3.4 of the Draft EIS. The proposed drainage system improvements and measures that will be taken to protect against siltation and sediment loading of existing drainage channels will prevent or minimize potential runoff impacts to the marine environment.

COMMENT NJW-21 - Air and Water Quality

In compliance with applicable federal and state rules and regulations, permits will be requested at the time final design of the facilities is completed. The Governor has certified that the State of Hawaii, with respect to the Proposed Project, will locate, design, construct, and operate the airport in compliance with all applicable air and water quality standards. The air quality issues are discussed in Section 3.7 of the Draft EIS. The water quality issues are discussed in Section 3.8 of the Draft EIS.

In regards to the island wide air quality, the Proposed Project will have lower emissions than the no-action alternative and therefore there is a potential positive impact of the overall island wide air quality.

COMMENT NJW-22 - Biotic Communities, Wetlands

The potential impacts of the Proposed Project on biotic communities and wetlands are discussed and analyzed in Section 3.11 and 3.12 of the Draft EIS, respectively. The discussion on biotic communities and wetlands have been reviewed by the FWS, U.S. Army Corps of Engineers and State Department of Land and Natural Resources and comply with applicable federal and state rules and regulations. In regards to the DOT Section 4(f) see response Comment NJW-5.

COMMENT NJW-23 - Hydrology, Floodplain Management, and Drainage

As indicated in the Draft EIS (see Section 3.13.4) there will be no significant impacts due to the hydrology, floodplain management or drainage characteristics of the Proposed Project site. However, new facilities will be designed and constructed to meet federal and state flood zone and coastal high hazard

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rules and regulations. Further, the proposed improvements to the drainage system are planned to reduce the potential for airport flooding. Also, please refer to response Comment No. NJW-20.

COMMENT NJW-24 - Farmland

As indicated in the response Comment NJW-2 above, the alien species issue is discussed and analyzed in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. In addition, the alien species issue has been discussed in a separate biological assessment that will be appended to the Final EIS. These discussions include consideration of the potential impact of alien species on Maui's farmland. The Draft EIS accurately reflects the impact of the loss of agricultural lands within the airport environs and is discussed in Sections 3.4 and 3.17 of the Draft EIS.

COMMENT NJW-25 - Alternatives

The alternatives discussed in the Draft EIS, including other sites for the Proposed Project, have been discussed relative to their ability to meet the project objectives, i.e., to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands. This analysis is consistent with the requirements of NEPA and HEPA. The EIS has identified and evaluated a reasonable range of options that could accomplish the lead agency's objectives.

COMMENT NJW-26 - Cumulative Impacts

As indicated in response Comment NJW-2 above, the alien species issues are discussed and analyzed in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS and are also discussed in a separate biological assessment. International flight operations are discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in 8.2.1. (Refer to Comment NJW-3 on international flight operations.)

Facilities already constructed and part of the existing airport facilities have been summarized in Section 1.8 of the Draft EIS and their impacts have been analyzed and described in previous environmental documents as required by NEPA and Chapter 343, HRS.

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These facilities are also analyzed in the cumulative impact section (refer to Section 5.0 of the EIS or included as part of the existing environment or current condition. (See response Comment NJW-9)

COMMENT NJW-27 - Alien Species Action Plan

The coordination of federal and state inspection agencies and the prevention and control measures necessary to mitigate the threat of alien species invasion are discussed in detail in the biological assessment prepared for the project. The biological assessment is included as an appendix to the Final EIS. These mitigation measures are discussed in the Final EIS. See response to Comment NJW-2, above for more information.

COMMENT NJW-28 - Conclusion

This comment presents the commentator's opinions regarding the adequacy of the Draft EIS to NEPA. We disagree with the opinions of the commentator. The environmental analysis was performed in an objective manner consistent with the requirements of NEPA as well as the Hawaii Environmental Act, Chapter 343, HRS. Nevertheless, the commentator's opinions will be part of the record and made available to the decision makers prior to a final decision on the Proposed Project. A copy of the Final EIS which will be sent to you under separate cover. The changes incorporated between the Draft EIS and Final EIS will be shown.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)



Conservation Law Project

RECEIVED
February 23, 1997
U.S. DEPARTMENT OF TRANSPORTATION

97 HR -3 P3:22

February 23, 1997

U.S. DEPARTMENT OF TRANSPORTATION

Mr. David J. Welhouse
U.S. Department of Transportation
Federal Aviation Administration
Honolulu Airports District Office
Box 50244
Honolulu, Hawaii 96850

Mr. Owen Miyamoto
Airports Administrator
Department of Transportation
Airports Division
400 Rodgers Boulevard, Suite 700
Honolulu, Hawaii 96819

Re: Kahului Airport Expansion Project -- Impacts on Haleakala National Park
and Maui's Native Ecosystems

Dear Messrs. Welhouse and Miyamoto:

We are writing on behalf of our client, the National Parks and Conservation Association, to express our grave concern that the impacts of the Kahului Airport project on Maui's natural resources, including those of Haleakala National Park, have not been adequately analyzed and considered by responsible federal and state agencies. NPCA appreciates the Federal Aviation Administration, U.S. Department of Transportation's ("FAA") efforts to comply with the U.S. Fish and Wildlife Service's ("FWS") demand for a biological assessment to address the impacts of the Airport project on the endangered and threatened species of Maui. However, the adequacy and the accuracy of FAA's biological assessment has been called into question by the National Park Service ("NPS"), the United States Biological Survey and other members of the Biological Assessment Technical Panel ("BATP"). As currently drafted, the biological assessment fails to meet the basic requirements of Section 402 of Title 50 of the Code of Federal Regulations, the implementing regulations for the Endangered Species Act, 16 U.S.C. § 1531 et seq. ("ESA"). Most significantly, from our perspective, the biological assessment fails to respond to the National Park Service's request that FAA fully evaluate the impacts of the proposed project on the resources of Haleakala National Park.

Unless and until these impacts are fully disclosed and subject to public review and comment, any action taken by FAA or Hawaii Department of Transportation ("H-DOT") to implement the Kahului Airport project will constitute a violation of federal and state law, including the National Environmental Policy Act, 42 U.S.C. § 4371 et seq. ("NEPA"), the implementing regulations of the Council on Environmental Quality, 40 C.F.R. § 1500.1 et seq., the Hawaii Environmental Policy Act, Chapter 343 of the Hawaii Revised Statutes ("HEPA"), the ESA, Organic Act of 1916, 16 U.S.C. §§ 1 et seq., and the Airport and Airway Improvement Act.

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The March 1996 Draft Environmental Impact Statement for the Kahului Airport Improvements ("Draft EIS") is deficient in many respects, as demonstrated in the comments submitted by NPCA, by the public, by federal and state agencies and elected officials. By far, the most frequently cited complaint during the public hearing on the Draft EIS was its inadequate treatment of alien species introductions and their potential impacts on Haleakala National Park. (*Maui News*, May 9, 1996.) At least five times since June, 1996, NPS has requested that FAA address the impacts of the project on Haleakala National Park. NPS astutely pointed out that the biological assessment process presented a convenient opportunity to concurrently study impacts on Park resources, and even offered to provide FAA with expert assistance in preparing a document that fully analyzes the impacts of the airport project on Haleakala National Park. Nevertheless, FAA has made no attempt to address this critical issue. As a result, the biological assessment, now in the final draft stage, fails to rectify the wholly inadequate analysis set forth in the Draft EIS. Not surprisingly, on December 11, 1997, at the final meeting of the BATP, Mr. Welhouse and FAA's consultant, Mr. Dittman, told Superintendent Reeser that impacts on the resources of Haleakala National Park would not be addressed.

FAA cannot ignore NPS, the public, and the law. FAA is obligated to provide a legally adequate evaluation of impacts on Haleakala National Park, including a thorough analysis of any potential impairment of park resources. While an adequate biological assessment is mandated by the provisions of the ESA, additional analysis of the impacts on the resources of Haleakala National Park is mandated by NEPA, HEPA, the Organic Act, and section 509(b)(5) of the Airport and Airway Improvement Act.

I. FEDERAL LAW MANDATES A FULL EVALUATION OF IMPACTS ON HALEAKALA NATIONAL PARK

A. FAA Has Represented to the Public, to NPS, and to Senator Inouye That the Impacts of Alien Species Introduction Will Be Fully Evaluated.

FAA has publicly acknowledged that the Draft EIS is inadequate and has assured the public and elected officials that NPS's concerns will be fully addressed in the Final EIS. Senator Akaka wrote to FAA on May 24, 1996 to express his distress regarding FAA's failure to include the National Park Service in the environmental impact statement process "[g]iven the proximity of the park to the airport, the unique biological resources that Haleakala National Park embraces, and the well-recognized threat that alien species pose to the biological resources of the park." (Letter dated May 24, 1996 from Senator Akaka to David Hinson.)

Apparently in response to this and similar letters, FAA met with FWS and NPS on June 6, 1996 to discuss concerns raised by these agencies during the Draft EIS comment period. In that meeting, FAA agreed to further evaluate the impacts of alien species introduction caused by the airport project. Later, on July 23, 1996, the FAA wrote to U.S. Senator Daniel K. Inouye in response to the Senator's letter of inquiry on behalf of the citizens of Hawaii:

See Comment K-11-1

See Comment K-11-1

a biological assessment is being conducted to further survey all possible species which may impact the island from domestic and international flights. . . . The U.S. Fish and Wildlife Service along with the National Park Service are key members in the preparation and review of this biological assessment. In summary, the Final EIS will thoroughly address the alien species issue, provide/recommend mitigation measures (if required), and include documentation that coordination with the National Park Service has been conducted to its fullest.

Based on these representations, Senator Inouye has assured his constituents that "the Final EIS for the airport expansion project will address the alien species issue, and recommend appropriate mitigation measures, as required." (Letter dated August 14, 1996 from Senator Inouye to Mrs. James C. Lindsay).

Despite these representations, however, FAA has failed to produce an adequate and thorough biological assessment and has ignored its commitment to fully evaluate the impacts of the introduction of alien species into the island's pristine ecosystems, especially Haleakala National Park.

B. Even an Adequate Biological Assessment Would Not Satisfy FAA's Mandate to Consider the Impacts of the Project on the Park's Resources.

Even if FAA produced an adequate biological assessment -- one which fulfilled all requirements set forth in Section 402 of Title 50 of the Code of Federal Regulations -- the document would fail to fully evaluate impacts on the resources of Haleakala National Park. A biological assessment, as defined in 50 C.F.R. Part 402, is an extremely limited document which only determines whether any endangered or threatened species are likely to be adversely affected by the proposed action. 50 C.F.R. § 402.12. After submission of a biological assessment to FWS, no further action is required if "there are no listed species or critical habitat present that are likely to be adversely affected" or "the action is not likely to jeopardize the continued existence of proposed species or result in destruction or adverse modification of proposed critical habitat." 50 C.F.R. § 402.14. Moreover, the strict protective measures of the ESA are not invoked until the continued existence of a listed species is jeopardized. 50 C.F.R. § 402.14.

This very narrow focus lies in stark contrast to the broad mandate of the National Park Service, as defined by the National Park Organic Act and the Parks' enabling statutes. The Organic Act charges the Park Service with the duty to protect and preserve *all* of the parks' resources, not just endangered plants and animals. These resources must be protected from any impairment to ensure enjoyment for future generations. 16 U.S.C. § 1. Long before the existence of any one of the Park's seventy endangered plants and animals is considered "jeopardized," other native plants and animals, functioning ecosystems, and pristine resources of the Park are likely to be severely impaired. These serious impacts cannot be ignored.

In addition to the mandate of the ESA, the threat of the potential impacts from alien species introduction on park values and resources must be evaluated within the context of the NPS mandate to affirmatively prevent park resource degradation. The Organic Act of 1916, 16 U.S.C. §§ 1 et seq., created the National Park Service to manage the resources of the national parks in accordance with a single purpose -- to provide for the enjoyment of the national parks, monuments and reservations unimpaired for future generations. Subsequent statutory amendments and judicial decisions have established that the Organic Act provides a legal basis for protection from externally-generated threats to basic park resources and values and establishes an absolute duty of the National Park Service to fulfill the mandate of the Organic Act "to take whatever action and seek whatever relief as will safeguard the units of the National Park System." *Sierra Club v. Andrus*, 487 F. Supp. 443 (D.D.C. 1980); see also 16 U.S.C. § 1a-1; *Sierra Club v. Dept. of Interior*, 398 F. Supp. 284 (N.D. Cal. 1975).

Accordingly, the current biological assessment, focussing on whether the existence of listed species will be jeopardized by the proposed project, does not fulfill FAA's obligation to consider any impairment of the resources of Haleakala National Park, including all native Hawaiian plants and animals and their supporting ecosystems.

C. Federal Law Requires FAA's To Fully Evaluate the Impacts of the Airport Project on the Resources of Haleakala National Park

FAA's duty to evaluate the biological impacts of its proposed project is not limited to the mandate of the ESA. Other federal and state laws require that the impacts on the resources of the Park be evaluated using a standard which mirrors NPS' mandate to prevent any degradation of park resources, including long-term and possibly subtle ecological impacts resulting from alien species introduction. In addition to the Organic Act, FAA's duty to fully evaluate the impacts of the airport project on the resources of Haleakala National Park is set forth in NEPA, HEPA, FAA Order 5050.4A, and the Airport and Airways Improvement Act, § 509(e)(5).

NEPA requires that an EIS evaluate all environmental consequences of a proposed action, including a full evaluation of both direct and indirect effects on the environment. 40 C.F.R. §§ 1502.16, 1502.16. Impacts on natural systems, including ecosystems, are expressly defined as effects under NEPA. 40 C.F.R. § 1508.8. An appropriate analysis of potential impacts and their relative significance must be based upon appropriate standards of significance. Accordingly, impacts on Haleakala National Park must be measured by the statutes and regulations governing the Park's resources, including for example, whether alien species introductions will impair the resource of Haleakala or derogate the values and purposes for which the Park has been established. Unless and until the EIS offers a complete and accurate evaluation of impacts on Haleakala National Park and mitigation measures for public review and comment, the document will be inadequate and subject to legal challenge.

FAA and the Department of Transportation are further required to protect park resources

premise that the passenger levels and cargo/mail tonnage are similar in both the No Action and Proposed Project alternatives. (DOI Comments, page 3.) FWS believes that "the rate and diversity of alien species introductions to Maui would increase and these introductions could result in severe adverse impacts to threatened and endangered species on Maui." (DOI Comments, page 3.) Accordingly, the biological assessment (along with the EIS) specifically must analyze the extent to which the proposed project will increase passenger levels and cargo/mail tonnage, increase the rate of alien species introductions, and pose a significant biological impact on the native ecosystems of Maui.

B. A Realistic Demand Forecast is Critical to a Proper Evaluation of Alien Species Introduction.
In addition to the questions raised by FWS, input from the BATS has established that the number and frequency of international flights arriving at Kahului Airport directly correlates with the anticipated level of alien species introduction. Accordingly, it is critical that the demand forecast for Kahului Airport be as accurate as possible. FAA has used the overseas flight demand forecast set forth in the Draft EIS as the basis for the analysis in the biological assessment. This demand forecast is fatally flawed and must be reevaluated to provide a more realistic and accurate forecast.

The current demand forecast anticipates zero international flight operations at Kahului until the year 2010. This flawed prediction is based on the assumption that no international flights will arrive at Kahului until construction of permanent international facilities. With or without these facilities, however, the Draft EIS acknowledges that the extended runway will facilitate economical international flights and that neither FAA nor H-DOT have authority to prevent international flight operations into Kahului.
Given the options of pre-clearance, existing and future Open Skies Treaties, existing and future bilateral agreements for international operations at Kahului and the ability to construct interim customs facilities, the demand forecast should be reevaluated to accurately disclose the anticipated number of international flight operations occurring at five-year increments, once runway 2-20 is extended to 9600 feet.

C. The Biological Assessment Is Incomplete, Inaccurate and Misleading
The following is only a brief discussion of the inadequacies of the biological assessment. For a more thorough review, please refer to the December 10, 1996 memorandum from Superintendent Reaser, NPS, to David Welhouse, FAA, and the letter dated January 24, 1997 from Superintendent Reaser to Mr. Welhouse. In addition, comments submitted to FAA by the United States Geological Survey, Biological Resources Division and other BATS members illustrate the numerous technical and biological errors contained in the biological assessment.

under federal transportation laws. The Department of Transportation Act and the Airport and Airways Improvement Act prohibit approval of any federally supported transportation project which requires the "use" of any publicly owned land from a public park or which may have a significant impact on natural resources, unless there is no feasible and prudent alternative and all reasonable steps have been taken to minimize such adverse effect. 49 U.S.C. § 303(c). Specifically, under section 509(b)(5) of the Airport Act, "the FAA shall authorize no project under the Airport Improvement Program involving airport location, a major runway extension, or runway location found to have a significant adverse effect unless the agency shall render a finding in writing, following a full and complete review, that no feasible and prudent alternative to the project exists and that all possible steps have been taken to minimize such adverse effect." FAA Order 5050.4A, ¶ 83. Comments on the Draft EIS submitted by the Department of Interior clearly establish that the potential impacts on Haleakala National Park and the entire Maui ecosystem from alien species invasion were inadequately evaluated in the Draft EIS. And while FAA rightly has abandoned its previous claim that the distance between Kahului Airport and Haleakala National Park translates into "no impact," FAA has yet to fulfill its obligation to assess all potential impacts of the proposed airport project on Haleakala National Park, including but not limited to, whether the project will "use" the park by causing significant adverse impacts on its resources. That is what NPS, Hawaii's Senators, and the public are expecting -- and what the law mandates.

II. THE BIOLOGICAL ASSESSMENT FAILS TO MEET THE BASIC REQUIREMENTS OF THE ENDANGERED SPECIES ACT

As demonstrated, even a comprehensive biological assessment would not adequately consider impacts on Park resources. Here, our concern is compounded by FAA's failure to produce a legally adequate biological assessment. Despite months of preparation and volumes of input from the region's experts on alien species and local ecosystems, FAA has produced a wholly inadequate, self-serving document which all but ignores the inescapable conclusion that a severe threat is posed to Maui's endangered species and ecosystems by an expanded Kahului airport.

A. The Biological Assessment Fails To Respond to the Fish and Wildlife Service's Comments on the Draft EIS/EIR
Statements and conclusions in the December 31, 1996 draft biological assessment flatly contradict the comments submitted by FWS, through the Department of Interior, on the Draft EIS. For example, FAA's continued reliance on the assumption that the proposed project will not increase the level of airport operations not only flies in the face of logic but is contrary to FWS statement specifically calling for an evaluation of the "increase in number and variety of alien species accidentally being introduced from the proposed direct overseas flights from Asia and the Pacific." Department of Interior Comments on March 1996 Draft EIS for the Proposed Kahului Airport Improvements, June 6, 1996 ("DOI Comments"). In particular, FWS disagrees with the

See Comment N-1-2

See Comment N-1-1

See Comment N-1-1

See Comment N-1-2

A biological opinion must provide information and analysis of the potential impacts of the proposed project and the alternatives, as clearly set forth in 50 C.F.R. Part 402. No analysis of alternatives, including the No Action alternative, is offered in this biological assessment. The omission of this analysis was raised at nearly every meeting of the BATP, yet FAA has taken no action to fulfill this requirement. A comparative analysis of the impacts of each alternative identified in the Draft EIS is critical to providing a thorough and accurate analysis of the difference in the level of impact anticipated to result from the various alternatives, including the No Action alternative. Without an adequate discussion of the impact of alternative projects, the biological assessment is legally inadequate.

Furthermore, the biological assessment contains many misleading statements. Contrary to the document's claim, the public has been expressly excluded from any meaningful participation in the drafting of the biological assessment. Only after extreme pressure from interested individuals was the public allowed to attend, but not participate in, meetings on the biological assessment. Moreover, the biological assessment overstates the authority of the BATP. The biological assessment boasts of extensive expert participation, but, in fact, no member of the BATP has been or will be asked to sign-off on the content or conclusions of this biological assessment. And, as discussed below, these members have been precluded from reviewing any drafts of the most critical sections of the document. In truth, FAA and FWS have exercised exclusive decision-making authority over the content and conclusions of the biological assessment -- often in disregard of the recommendations of the BATP members.

The section on Project Description includes incorrect and self-serving assumptions which result in a skewed analysis of impacts. Similar to the Draft EIS, the project description improperly segments the proposed project into "phases" in order to avoid full evaluation of the impacts of the project as a whole. As explained in our comments on the Draft EIS/EIR, evaluation of all environmental consequences associated with the whole, three-phase project cannot properly be delayed until some unknown future time. Federal laws, including NEPA and ESA, plainly require that all biological impacts associated with each phase of the proposed project be fully evaluated in this biological assessment. See e.g., 50 C.F.R. § 402.14 (Evaluation of a segment of a comprehensive plan, "does not relieve the Federal agency from considering the effects of the action as a whole.").

Finally, the biological assessment improperly distinguishes between direct and indirect impacts of the proposed project. Part 402 of Title 50 does not support a distinction between direct and indirect action areas. To the contrary, this part expressly identifies a single action area, including all areas to be affected. 50 C.F.R. § 402.02. The impacts to direct and indirect action areas are treated equally under the law; therefore, no distinction should be made in the biological assessment.

See Comment N47-1

See Comment N47-4

See Comment N47-1

D. The National Park Service and other Advisory Board Members Have Been Denied the Opportunity to Review and Comment on a Complete Draft of the Biological Opinion

Reducing the function of the BATP to little more than charade, FAA has denied members of the BATP, including the Park Service, the opportunity to review and comment on the most critical sections of the biological opinion. The members of the BATP represent the foremost experts on Hawaiian native ecosystems, alien species introductions and their impacts. Yet, FAA has insisted on excluding these members from reviewing Section 1, Conclusions and Recommendations, as well as the revised sections on Impacts and Mitigation. This action is not only unprofessional, but scientifically irresponsible. There is little hope that, without full participation of the experts on the BATP, the biological assessment will survive eventual public scrutiny and legal challenge.

E. CONCLUSION

FAA's unreasonable delay in fulfilling its legal obligations has resulted in a loss of valuable time and expert resources. We strongly recommend that immediate action be taken to ensure compliance with FAA's duties under the law.

Sincerely,

Nicole J. Walthall

cc: Brian Huse, NPCA Pacific Region
Donald Reuter, Superintendent HNP, NPS
Stanley Albright, Pacific West Region Director, NPS
Pacific Area Director, USFWS
Senator Daniel K. Inouye
Senator Daniel K. Akaka
Representative Patsy Mink
Governor Benjamin Cayetano
David Hinson, FAA Administrator

See Comment N47-1



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Ms. Nicole J. Walthall
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potential impacts to Haleakala National Park. The analysis provided is adequate as required by law.

In light of your concerns regarding this issue and the adequacy of the analysis provided, we have provided a summary of the consultation process and the analysis provided in the EIS,

The alien species issue is discussed and analyzed in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, NPS, FWS, and the State of Hawaii, Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

Ms. Nicole J. Walthall
Conservation Law Project
123 Townsend Street, Suite 250
San Francisco, California 94107

Dear Ms. Walthall:

Subject: Kahului Airport Expansion Project -- Impacts on Haleakala National Park and Maui's Native Ecosystem Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comments on the Draft EIS on the Kahului Airport Improvements, in your letter dated February 23, 1997. (A previous comment letter was submitted on May 23, 1996, and has been responded to separately). This letter is in response to your letter of February 23, 1997, which is attached for reference.

COMMENT NJW-1 - Adequacy of the Biological Assessment

The potential impacts of the Proposed Project on Maui's natural resources, including those at Haleakala National Park, have been discussed and analyzed in Sections 3.0 and 5.0 of the Draft EIS. In addition, these potential impacts have been examined in connection with the biological assessment prepared for the project. We disagree with your opinion that the "biological assessment fails to meet the basic requirements of Section 402 of Title 50 of the Code of Federal Regulations." Without further information, we cannot comment further. However, your comment letter will be provided to the decision makers prior to a final decision on the proposed project.

Contrary to the commentator's assertions, the biological assessment does evaluate the impacts of the Proposed Project on the introduction rate of alien species to Maui, including the

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

In March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic or international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of

hotel accommodations, general economic conditions, and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction rate may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction rate of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui. During the preparation of the biological assessment, a Biological Assessment Technical Panel (BATP) was formed to provide technical information on alien species and possible interception techniques. The NPS and National Biological Services were members of the BATP.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion, prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS (Refer to the attachment "mitigation measures").

The Draft EIS has discussed and studied the impacts of the Proposed Project on Department of Transportation Section 4(f) Lands and on alien species.

In regards to your comment on international flights, the current airport is presently accommodating direct charter, scheduled and military international flights from Canada and elsewhere. The noise impacts for international flights are discussed and analyzed in Section 8.2 of the Draft EIS. The change in air traffic due to international flights is discussed in Appendix N of the Draft EIS and used in the analysis in the impact analysis of international flight operations in Section 8.2 of the Draft EIS. Also refer to response COMMENT NJW-3.

The commentator indicates that the FAA has "publicly acknowledged that" the Draft EIS is inadequate. This statement is inaccurate. The FAA and HDOT, Airports Division have been in consultation with the FWS, regarding the impacts of the Proposed Project since 1995, in order to ensure that the Draft EIS's impact analysis is adequate. We also disagree with your opinion that the Draft EIS and the biological assessment are inadequate and self-serving documents. The EIS and biological assessment were prepared in an objective manner. In addition, the FAA has not ignored the NPS and has provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The information provided by the NPS has been used by the FAA and HDOT, Airports Division, to the maximum extent possible in the preparation of the EIS consistent with their responsibilities as lead agencies.

COMMENT NJW-2 - Growth Inducing Impacts

The analysis performed for the EIS addressed the potential growth impacts for the Proposed Project and its alternatives with and without internationalization. These impacts and conclusions are discussed in Sections 3.5, 3.6, 6.0 and 8.2, and Appendices E and N of the Draft EIS. Neither the FWS nor the NPS has provided any technical information that contradicts the information in the EIS or the biological assessment related to the growth inducing impacts of the Proposed Project.

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS.

Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilitates growth but does not induce growth.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to

the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project.
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast." The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.2.5.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study. Although the SIAR concluded that there would be insignificant growth impacts, the Draft EIS did analyze the potential impacts of the Proposed Project on the introduction rate of alien species, in a project-specific and cumulative context.

COMMENT NJW-3 - International Flights

We disagree with the commentator's statement that the demand forecast is fatally flawed. The forecast currently does indicate the forecast aviation demand in five year increments. At this time and as concluded in the SIAR, the aviation forecasts are not expected to significantly change with the construction of the 9,600 foot runway. In addition, the issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS and the following information is provided. Please refer to the attachment "international flights."

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

COMMENT NJW-4 - Segmentation

We disagree with your opinion that the Project Description is incorrect and contains self-serving assumptions. The various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and

long-term (Phase 3). The categorization of the projects is based on the existing and forecast demand. The Phase 1 improvements are needed to meet existing demands and deficiencies, and the Phase 2 and Phase 3 projects to meet the aviation demands anticipated for the Year 2003-2008 and the Year 2009-2016, respectively. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. As stated in Section 1.5.1, these long-range projects are analyzed in this Draft EIS to the extent possible in order to determine the individual and cumulative impacts as required by HRS Chapter 343 and NEPA. However, given that the construction of these projects will occur, if at all, after the Year 2009, and, more likely near or after the Year 2016, the Draft EIS could provide an impact analysis for foreseeable impacts both individually and cumulatively. At this point in time, any more detailed analysis would be highly speculative and prone to error, for it is very likely that each of these long-term projects will undergo substantial changes over the next ten to fifteen years. For example, the scope, size, location and timing of the projects may be altered should air travel to and from Maui evolve and take shape differently than originally anticipated.

If and when the parallel runway, transient apron, helicopter facilities and fuel pipeline are defined in detail and submitted as projects to be implemented, each will be subjected to a more in-depth environmental review as required by state and federal law, e.g., Environmental Assessments, Findings Of No Significant Impacts (FONISIs) or Environmental Impact Statements.

The fact that the Draft EIS cannot provide a comprehensive environmental review of the long-term projects does not mean that the Draft EIS is deficient. Under NEPA, multi-stage projects such as this one can be "segmented" so long as the portions of the project that are fully analyzed in the Draft EIS meet the following criteria: (i) they have substantial independent utility, (ii) they do not foreclose the opportunity to consider alternatives to the more speculative, long-term projects that will be studied later, and (iii) they do not irrevocably commit federal funds for those projects.

The short-term (Phase 1) and medium-term (Phase 2) projects proposed for Kahului Airport and analyzed in the Draft EIS meet these three criteria. Each has substantial and independent utility. In fact, even if the Phase 3 projects were never implemented, the Phase 1 and Phase 2 projects would still be necessary and would still serve their intended purposes. The

Phase 1 and Phase 2 projects also do not foreclose the opportunity to consider alternatives to the Phase 3 project proposals.

It is anticipated that the design, size, timing, location and need for the parallel runway, transient apron, helicopter facilities and fuel pipeline may change in the next ten to fifteen years. Because the Phase 1 and Phase 2 projects possess their own, self-contained utility, they in no way prevent the consideration of alternatives to the Phase 3 projects.

In addition, the Phase 1 and Phase 2 projects do not irretrievably commit federal funds for the Phase 3 projects. Indeed, one of the reasons that the Phase 3 projects are speculative is that federal funding for such airport improvements is not and cannot be guaranteed decades into the future. Because the Phase 1 and Phase 2 projects are independent of the Phase 3 projects, funding for the former does not commit funding for the latter.

The following information is provided to further clarify this issue and discussed in Section 1.5 of the EIS.

- It is anticipated that the transient apron will be constructed, if at all, after the year 2006. It is anticipated that the parallel runway, long-term relocation of the helicopters, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks will be constructed, if at all, after Year 2010.
- The Phase 1 and Phase 2 projects have utility apart from and independent of the parallel runway, transient apron, long-term relocation of the helicopters and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks. Similarly, these Phase 3 projects have independent utility and are not reliant on the implementation of the Phase 1 and Phase 2 projects.
- If and when the time approaches that the parallel runway is required to prevent substantial deterioration of service at Kahului Airport, the FAA will prepare the required environmental documentation pursuant to applicable state and federal law addressing the proposed runway's environmental effects. Currently, it is anticipated that Kahului Airport will not require the parallel runway, if at all, until after the year 2010. Detailed environmental documentation prepared closer to the time when the parallel runway would actually be

constructed ensures that the environmental analysis will be more accurate and relevant.

- In addition, the State of Hawaii, pursuant to HRS Chapter 343, will prepare its own environmental documents for the long-term, Phase 3 projects at a later date closer to the actual implementation of the project. These documents will be either supplemental to this Draft EIS or independent studies. It is also very likely that this Draft EIS, prepared in 1996, will be considered out of date and unreliable in the Year 2010, thus necessitating the preparation of a new environmental document at that time. Especially, due to the high probability that the long-range actions will change in size, scope, location, or timing.
- According to Council on Environmental Quality (CEQ) regulation 1508.28(b), tiering should be used to, "help the lead agency focus on issues that are ripe for decision and exclude from consideration issues already decided or not yet ripe." [emphasis added] Therefore, the Draft EIS focused on the short-term (Phase 1) and medium-term (Phase 2) projects, and deferred detailed analysis of the Phase 3 projects until a later date when they could be defined with greater precision and when the environmental effects could be determined more reliably and accurately.
- Due to public concern and as required by the Court-ordered stipulation, the Draft EIS also analyzes the impacts of: (i) realigning, widening and improving Alahao Street and extending it to the northeast to Hana Highway as a road open for public use and providing through traffic along the coastal side of Kahului Airport; and (ii) international flight operations including permanent and temporary (interim) international facilities. Note, however, that permanent international arrival facilities is not part of the Proposed Project. However, the 1994 updated aviation forecasts, shows that a permanent facility may be needed at the Year 2010 or beyond.

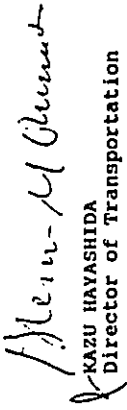
Although, we disagree with your opinions about the EIS and biological assessment, your comments will be made available to the decision makers prior to a final decision on the Proposed Project. A copy of the final EIS will be sent to you, with the modifications to the Draft EIS are highlighted.

Ms. Nicole J. Walthall
Page 11

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If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,


KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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MAY 2 1988

May 18, 1986

David J. Welhouse
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu HI 96850

Dear Mr. Welhouse:

My name is Cole Warren. I have lived on Maui all my life, and I currently own and manage a frame shop here in Makawao. I am writing to express my concerns about the Draft "Environmental Impact Statement" for the proposed Kahului Airport Expansion Project.

Having grown up here, I accept that development is inevitable, given America's economic liberties and burgeoning population. What I absolutely cannot accept is development pursued dishonestly and irresponsibly. The so-called Draft "EIS" indicates that it is how your agency is pursuing this Project.

Why was the National Park Service denied participation in this Project's environmental review process? Haleakala National Park is Maui's single most important resource, and it is only 15 miles away from the airport. Americans are becoming increasingly sophisticated about such things as "intact ecosystems" and endangered species. Ecological principles are now a staple of virtually every American school's science curriculum. More and more of Maui's visitors will be aware of the fact that Haleakala is the best preserved piece of tropical rain forest in the National Park System and home to more endangered species than any other site in the System. The future of the visitor industry is eco-tourism; therefore I strongly believe that the well-being of Haleakala is fundamental to the continued well-being of Maui's visitor industry.

Why did you skirt the issue of alien species introduction in this "EIS", when the National Environmental Policy Act expressly requires a full evaluation of the direct and indirect effects of this Project (40 C.F.R., clause 1502.16)? You "addressed" this issue by merely pointing out that alien species introduction is a statewide problem, that there are many potential points of entry, and that other federal and state agencies have already studied the problem. That is hardly a valid excuse for disregarding the NEPA's requirements.

Why does this "EIS" also fail to offer careful, explicit details on quarantine and inspection facilities at the expanded airport? I would have imagined that at least 75% of the Project's EIS (and at least that much of the Project's cost) would be devoted to control measures. The current document acknowledges the need for control measures (p. 8-8), but there is no analysis of location, design or funding for these "modern inspection facilities." The inspection facilities at the current airport are already woefully inadequate. I have heard accounts of inspectors standing in open buildings, opening containers from distant locales and having clouds of bugs fly in their faces. The current state and federal inspection services are understaffed and underfunded. I personally favor an expanded airport, but if we can't afford state-of-the-art inspection facilities, we most certainly cannot afford the expansion.

Your Draft "EIS" is unworthy to be called an Environmental Impact Statement. Given all the serious omissions mentioned in this letter, it is nothing but propaganda. I am a champion of economic development--long-term, sustainable economic development. This Draft "EIS" indicates that you are pursuing short-term, unsustainable development. I would hate to see Maui's hard-earned revenues go toward correcting dire alien species invasions that could have been prevented in the first place. I would hate to see Maui's economy languish as we become an ecological cautionary tale. An international airport with inadequate inspection and quarantine facilities is a sure recipe for such a disaster.

Sincerely,



Cole Warren
738 Pelema
Makawao, HI 96768
808.572.5909

cc

David J. Welhouse, Federal Aviation Administration
Department of Environmental Quality Control, State Department of Health



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

HAUUNANU
DIRECTOR
IN TRANSPORTATION
OFFICE OF THE DIRECTOR
BRITAIN K. MINAMI

HAUUNANU
DIRECTOR
IN TRANSPORTATION
OFFICE OF THE DIRECTOR
BRITAIN K. MINAMI

Mr. Cole Warren
Page 2
August 20, 1997

AIR-EN
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COMMENT CW-2 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the proposed project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix F of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State

August 20, 1997

Mr. Cole Warren
738 Pelelaka
Makawao, Hawaii 96768

Dear Mr. Warren:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AH1011-07

Thank you for your comment letter of May 18, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT CW-1 - National Park Service (NPS) Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the Federal Aviation Administration (FAA) and State of Hawaii, Department of Transportation (HDOT), Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

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COMMENT CW-4 - Short-Term Development

The Proposed Project is planned to accommodate the existing demand and forecast growth of Kahului Airport. HDOT, Airports Division, uses a 20 year planning horizon, with five (5) year increments in their Master Planning process. One of the reasons for the 20 year time frame is it allows the HDOT, Airports Division, to establish guidelines for future development based on the existing and forecast aviation demand. However, the State regularly updates aviation forecasts and master plans in a reasonable and prudent manner.

COMMENT CW-5 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1. International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interisland international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the HDOT and the FAA. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed

Mr. Cole Warren
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regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP project and CCAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT CW-3 - Quarantine Facilities

An important element of the Proposed Project will be a new air cargo facility. The HDOT, Airports Division, is committed to the participation of the State and U.S. Departments of Agriculture and U.S. Customs in the planning and design of this new facility. In this manner, all affected agencies will be able to specify the type of equipment and facilities required to improve their present inspection methods and procedures. This will benefit all users of the airport. Similarly, the HDOT, Airports Division, is committed to funding additional State agricultural inspectors at Kahului Airport to further improve their efficiency and capabilities.


Mr. Cole Warren
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Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
809 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

REPORTING OFFICER
BRIAN K. HIRATA

AIR-EN
97.1113

August 20, 1997

Valley Farm P.O. Box 485 Haikū, Hawaii 96708 808-572-1609

May 20, 1996

Over-Subject
DOT Airports
Kahului International Airport
400 Rogers Blvd. #700
Honolulu Hawaii 96819

Re: Kahului Airport Expansion
Draft Environmental Impact Statement

The failure of the Kahului Airport Expansion DEIS to consider the impacts of internationalization involves all of the analyses centered in the document. It should be withdrawn and rewritten to ensure the internationalization that would certainly follow runway extension. Furthermore, the Kahului airport site is inappropriate for any airports - especially so for an international one. The DEIS should consider the merits of moving the entire airport elsewhere.

Sincerely,

[Handwritten Signature]

Mr. Greg Wescott
Valley Farm
P. O. Box 485
Haiku, Hawaii 96708

Dear Mr. Wescott:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT GW-1 - International Flight Operations

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1.

International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo

See Comment GW-1
See Comment GW-2

Mr. Greg Wescott
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to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation and the Federal Aviation Administration. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "international flights")

COMMENT GW-2 - Alternative Airport Sites

Various alternatives to the Proposed Project, including alternative airport sites, are discussed in Section 4.0 of the Draft EIS. As indicated in the Draft EIS, the present airport site has been in use as an airport for several decades. The development of another airport at another site would be prohibitive and relocate potential noise, traffic and other effects to another area of the island.

The potential impacts of the Proposed Project on the noise characteristics of the project area and surrounding environs are discussed in Section 3.2 of the Draft EIS. Airport and aircraft noise, as well as noise generated during construction and that generated by surface traffic, were analyzed for the EIS.

As indicated in the Draft EIS, there are no significant noise impacts due to the proposed project and no mitigation measures are warranted. The State should pursue the abatement and mitigation measures set forth in the Kahului Airport Noise Compatibility Program to reduce existing incompatible land uses within the Airport's environs. With regard to traffic noise, the increase in traffic along Dairy Road will cause a significant increase in ground vehicle noise. Although this impact may be greater without the Proposed Project, consideration should be given to reasonable and feasible mitigation measures. A reasonable and feasible mitigation measure suggested is the

Mr. Greg Wescott
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construction of a noise barrier along the lots affected by the increased traffic noise. This measure would be implemented if there is consensus among the homeowners and property owners.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

MAY 23 1976

2.

MASAKO WESTCOTT
PO BOX 485
HAWAII, MAUI, HAWAII 96708
(808) 572-1609

May 20, 1976
David Neelome
Edwin Keister, Administrator
Airport District Office
Box 50244
Honolulu Oahu 96850

Re: Draft Environmental Impact Statement
Proposed Kahului Airport Expansion

Throughout the long history of airport expansion at Kahului, the DOT has never presented the entire project as a whole, for public review. Even at this late date, critical elements are left for later examination. Among other omissions, this DEIS fails to examine the parallel runway, the fuel pipeline from Kahului Harbor along side the Kaneohe Middle Section of the airport, and most significantly, the International Terminal of Kahului Airport. The failure to study these proposals and to reveal their impacts on Maui's environment make this DEIS an inadequate document.

See Comment M-1

See Comment M-2

The DOT and the FAA must redraft and recirculate a document that is a genuine statement of the environmental impacts of all phases and aspects of this expansion project. In addition, the comments and questions in this letter must be addressed in the new DEIS.

Recent news confirms the State government's desire for international flights.

On April 30th, it was reported that JAL had been awarded the international Tokyo-Kona route. The following day, Ben Ceyetano announced he is negotiating with two other foreign carriers who want direct international flights to Maui.

The DEIS states in sec 5.2.4.:

The existing terminal facility can be modified using existing and existing to serve as an existing Federal Inspection Service facility for international flights, accommodating two flights a day.

and in sec 4.3.1.3: This DEIS rejects Alternative Plan 2 because the runway is not long enough for direct non-stop flights to international destinations. In Appendix the Executive Summary says:

There is a greater potential for growth in direct flights from international non-stop flights than from domestic flights.

Even this EIS in sec. 3.11.3.1 calls Honolulu International Airport, Hickam Air Force Base, and Barber Point Naval Air Station "High Risk Areas" for the introduction of alien species

What are the environmental impacts of creating a "High Risk Area" for the introduction of alien species, on Hawaii?

How are the wetlands of Kaula Wildlife Sanctuary and the vast agricultural lands that surround Kahului Airport different from the paved over urban environment of Honolulu International Airport, in regards to the introduction of alien species?

The DOT supports the Alien Species Action Plan which calls for major improvements in the current inspection systems

What improvements to the current inspection system are needed at Kahului Airport to significantly reduce the rate of alien species introductions?

This induced growth should be the basis of all the studies in this document. Failing to acknowledge intentional risks renders all the analysis incomplete.

The most foreseeable and inevitable of the consequences of an increase in air traffic is the introduction of foreign pests to Hawaii.

The issue of alien species has been a serious concern to Hawaii throughout the ten years that airport expansion has been an issue. However, the DOT has ignored it, has failed to address the problem or to propose any meaningful mitigation measures. Instead, the DOT has attempted to place responsibility elsewhere by stating (Sec. 5.1.5.1) that the introduction of alien species is an existing problem.

Apparently the "problem" exists because of airports. For the State EIS says that 76% of alien species arrive in Hawaii by air and that the major pathway is airline passengers.

The DOT can no longer deny the role of airports in Hawaii's crisis of extinction.

See Comment M-3

See Comment M-4

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

5

As a farmer I am acutely aware of the problem of alien species. The flood of new agricultural pests threatens not only my work but also the future of Hawaii's promising diversified agriculture. Right now a quarantine against Hawaii fruit caused by four alien fruit fly species cost Hawaii \$300,000,000 a year. Quarantines are spreading to include other export crops and could destroy all of Hawaii's export agriculture.

⑦ What would be the economic impact of quarantines against Hawaii's agricultural products - pineapple, onion, flowers and nursery plants?

The DEIS acknowledges a increase in the amount of cargo.

⑧ How much of this increase will be produce?

⑨ What is the environmental impact of an increase in the introduction of alien species that would occur with more imported produce?

⑩ What are the economic impacts of more imported produce competing with local farmers?

6

⑪ What are the economic, environmental and health impacts of an increased use of herbicides, insecticides and fungicides as a result of an increase in agricultural pests?

⑫ What is the economic potential of various high-value crops, beside sugar, that could be grown on the 700 acres of the highest rated prime agricultural land that this project would permanently destroy?

The recent 25,000 gallon fuel spill into Pearl Harbor from a pipeline like the one proposed for the delivery of fuel for Kahului Harbor to the airport, emphasizes the need to study this proposal now, in the DEIS. Reports indicate that Hawaii's acid soil causes rapid deterioration of buried pipelines.

⑬ What would be the impact on land's Wildlife Sanctuary of an underground fuel leak.

The proposed pipeline would be between the wetlands of Kaula Sanctuary and the ocean and within the Hawaii zone.

- ① - What would be the effect of a pipeline break caused by a tsunami?
By earthquake?
- ②. What would be the effect on coastal wildlife Sanctuary and its endangered birds of an emergency fuel dump by an approaching or departing plane?
- ③. What would be the cumulative effect of increasing industrialization near the Sanctuary including: industrial noise and lights, industrial chemical usage including gasoline, oil and detergents and solvents used in rental car operations?
Endangered Hawaiian Skirts have been killed by airplanes at Kahului.
- ④. How will those deaths be prevented in the future?
- ⑤. What is the effect of these deaths on the overall population of Skirts?
The DERS suggests that the only impact on the marine environment is the sedimentation caused by surface water runoff.

- ⑥. What are the environmental impacts of surface water runoff that is contaminated from the area and ocean of rental cars so close to the ocean?
and from the toxic substances that accumulate on the runway itself?
- ⑦. What would be the impacts of the increasing water use on our already overburdened water system if no new water sources are found?
- ⑧. Do a comparative cost analysis of a public transportation system that would make the proposed \$50,000,000 roadway and cloverleaf overpass unnecessary.
Today, approaching Kahului, the land is open and green. One can see all the way from Maui to Kahului.
Kahului - the West Maui Mountains
run above the cane fields.
Imagine all the cane fields that surround the airport paved over and a massive cloverleaf overpass welcoming us to the new Honolulu style Kahului.

How project team to claim in this DEIS done in the section on "Visual Effects" that the performance of the landscape from agricultural to urban is insignificant.

As though we won't notice the difference between what is beautiful and what is hideous.

(19) - Whose opinion is it - that the urbanization of 700 acres - more than a square mile of prime agricultural land is insignificant?

(20) Why what standards was this judgement made?

(21) - How much public money was spent to prepare the DEIS?

Sincerely,
Masako Westcott

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STATE OF HAWAII
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869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 20, 1997

KAZUMASA
DIRECTOR
INDUSTRY
GAIL HARRIS
BRIAN K. MINA
ENGINEER
AIR-EN
96.503

Ms. Masako Westcott
P. O. Box 485
Haiku, Hawaii 96708

Dear Ms. Westcott:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AH1011-07

Thank you for your comment letter of May 20, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT MW-1 - Project Description

The Proposed Project is fully described in Section 2 of the Draft EIS. To the extent possible, at this time, the potential environmental effects of the future parallel runway, future fueling facilities, and increased international flights are discussed. The analyses provided for all phases of the airport improvements are based on technical and scientific studies conducted specifically for the Proposed Project. Conclusions regarding specific impacts are only drawn from the analyses conducted and known information. To the extent that some of the elements of the Proposed Project are beyond the 20-year planning horizon for the Proposed Project, information regarding these elements must, of necessity, be preliminary at this time. When those elements, such as the parallel runway, become more fully defined, they will be the subject of separate environmental documentation. This is in keeping with the requirements of the National Environmental Policy Act and Hawaii environmental laws, rules, and regulations.

(Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated. The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternative, including the Proposed Project. They are studied in the SIAR and discussed in the Draft EIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel exports, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway facilities growth but does not induce growth. Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the increase in people existing facilities could not accommodate the increase in position and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport. Ultimately, the SIAR concludes that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project.

COMMENT MW-2 - Internationalization of Kahului Airport

The issue of International Flight Operations is discussed in Section 8.2 of the Draft EIS. In addition, the following information will be added to the discussion in Section 8.2.1. International service is different from domestic service in that airlines must receive government approval, through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation (HDOT) and the Federal Aviation Administration (FAA). Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project. Lastly, as you may be aware, international flights from Canada are already occurring at Kahului Airport and have been for four (4) years. (See attachment "International flights")

COMMENT MW-3 - Increased Economic Development

The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-Economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft EIS. Information from the SIAR was summarized and incorporated into the following sections of the Draft EIS: Section 3.5 (Socio-Economic Impacts); Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts); and Section 6.0

Ms. Masako Westcott
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Wildlife Service (FWS), and the HDOT. An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent, there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction

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• Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results. Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the HDOT's "Updated Aviation Demand Forecast". The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.25.22 of the Draft EIS. The SIAR also includes a complete description of its methodology and assumptions, as well as a list of tourism experts interviewed as part of this study.

COMMENT MW-4 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS.

The ASAP Project was made up of at least 20 state, federal and private organizations, including the FAA, The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and

may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOF have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS. (See attachment "mitigation measures")

QUESTION NO. 1 - Environmental impacts of alien species and internationalization.

See responses to Comments MW-2 and MW-4 above.

QUESTION NO. 2 - Difference between urban setting of Honolulu International Airport and wetlands/agricultural areas of Kahului Airport with regard to alien species introductions.

The likelihood of inadvertently introduced alien species becoming established on Maui versus Oahu as a function of the surrounding environment has to do primarily with the prevailing wind direction as well as the character of the surrounding areas. At Honolulu International Airport the prevailing northeast trade winds tend to blow away from the airport and out to sea. At Kahului, the prevailing winds tend to blow across the isthmus of the island, thereby increasing the possibility of inadvertently introduced alien insect species becoming established on the island. This issue is discussed in the Biological Assessment noted in response to Comment MW-4 above. The potential effects of alien species will depend on the specific species that

may become established and could range from crop damage to damage to protected plants and animals on either island. This issue is also discussed in the Alien Species Biological Assessment.

QUESTION NO. 3 - What inspection system improvements are required.

At present, federal and state inspection actions are limited by personnel and adequate time to fully inspect all air passengers and cargo. Specific inspection system improvements required to more fully inspect air passengers and cargo are also identified in the Alien Species Biological Assessment. A key element to reducing the rate of alien species introductions into Hawaii is educating the public of the dangers of bringing plants and animals into the State. In this regard we can all help by making sure our friends and neighbors know that it is illegal to bring plants and animals into the State without declaring those plants and animals on the agricultural forms all passengers are required by law to complete. Alien species introductions is becoming an international problem and it may take new federal and state legislation to better control those introductions into Hawaii.

QUESTION NO. 4 - What would the economic impact be of quarantines against Maui's agricultural products.

At present, as noted in your letter, the economic impact is about \$300,000,000 per year to control fruit flies. Beyond that, there are quarantines against the exportation of certain Hawaii agricultural products to the mainland U.S. as well as foreign countries. The quarantines are established to prevent insects and plant diseases from Hawaii entering other states and countries. Your statement on increased quarantines is speculative in nature, and therefore, an estimated amount cannot be provided. We disagree that the Proposed Project will cause additional quarantines on Maui agricultural products, but your comment will be made available to the decision makers prior to a decision on the Proposed Project.

QUESTION NO. 5 - How much of this increase will be produce.

The majority of Hawaii grown produce is consumed in the State and is not exported to the mainland U.S. or other countries. Exceptions to this are papaya, pineapple and processed macadamia nuts. Both the papaya and pineapple are subjected to treatment prior to export. The future quantities of produce available for export will, in larger part, depend on the competitiveness of Hawaii's produce versus that of the mainland U.S. and other countries.

QUESTION NO. 6 - What is the environmental impact of an increase in the introduction of alien species that would occur with more imported produce.

The potential environmental impacts of increased numbers of alien species introduced into Hawaii are discussed in the Draft EIS and the Alien Species Biological Assessment noted in Comment MW-4 above.

QUESTION NO. 7 - What are the economic impacts of more imported produce competing with local farmers.

In general, imported produce is less expensive than locally grown produce, and consumers generally chose those products that are within their buying power. The proposed Project is expected to create new jobs and increase the buying power of those employees as well as those already employed at the airport. To the extent that local farmers can compete with imported produce will, in large part, depend on inexpensively local farmers can produce their products. This is a State-wide question that is not necessarily tied to the Proposed Project.

QUESTION NO. 8 - What are the economic, environmental and health impacts of an increased use of herbicides, insecticides and fungicides as a result of an increase in agricultural pests.

In general, all approved biocides (herbicides, insecticides, and fungicides), when used per label instructions and when applied by State certified applicators, should not result in adverse environmental, or health impacts. The costs of using greater quantities will depend on the amounts of biocides used. One component of the Alien Species Biological Assessment that has been prepared is to define improved methods to control the importation of increased numbers of alien species. Implementation of the measures defined is expected to minimize the importation of agricultural pests.

QUESTION NO. 9 - What is the economic potential of the various high value crops, besides sugar, that could be grown on the 700 acres of the highest rated prime agricultural land that this project would permanently destroy.

As indicated in the Draft EIS, the Proposed Project includes the acquisition of 503 acres of land to prevent encroachment of non-airport uses. In addition, another 85 acres will be acquired

for airspace and navigational purposes. Further, the Proposed Project will require approximately 139 acres of sugar cane crop land to be withdrawn from production by the Year 2010. The total amount of lost farmland will increase to 700 acres if the parallel runway is constructed. According to A&B Hawaii, Inc., the landowner, the removal of sugar cane lands to airport improvements will not adversely affect their operations. The economic value of other crops grown on this land will depend on the type of crops grown and the ability of the grower to market those crops.

COMMENT MW-5 - Fuel Line Integrity.

The fuel line that broke at Pearl Harbor was approximately 40 years old and constructed to standards in existence at the time of construction. Improvements in pipeline design and construction, as well as new federal and state requirements for both above ground and below ground pipelines will be followed in the design and construction of the proposed new fuel line. These measures are designed to protect against ruptures like that which happened in Pearl Harbor. Further, appropriate cathodic protection measures are now designed into buried pipelines to protect against acidic and alkaline soil conditions.

QUESTION NO. 10 - What would be the impact on Kanaha Wildlife Sanctuary of an underground fuel leak.

As indicated above, the proposed fueling facilities will be designed, constructed and operated in compliance with all applicable federal and state codes, rules and regulations to prevent the contamination of soil, runoff and groundwater. Above ground and/or underground fuel leaks are not expected to occur. However, the extent of any impacts to Kanaha Pond Wildlife Sanctuary would depend on the quantity of fuel leaked and the rapidity of response to that leak.

QUESTION NO. 11 - What would be the effect of a pipeline break caused by a tsunami. By earthquake.

As noted above, the new fueling facilities would be designed, constructed and operated in compliance with applicable federal and state codes, rules and regulations. These codes, rules and regulations include design standards to accommodate tsunamis and earthquakes and no damage to the fueling facilities are expected.

QUESTION NO. 12 - What would be the effect on Kanaha Wildlife Sanctuary and its endangered birds of an emergency fuel drop by an approaching or departing plane.

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interaction between aircraft and Hawaiian Stilts, the State Department of Agriculture, Animal Damage Control Division, has acquired a taking permit to haze the Stilts from the airport. In addition, HDOP, Airports Division, is undertaking operational and maintenance measures to lessen the attraction of the airfield to Hawaiian Stilts. These measures will deter and reduce the feeding attraction of the ponding areas on the airfield to the Stilt, and include, but are not limited to, drainage improvements and plantings.

QUESTION NO. 15 - What is the effect on these deaths on the overall population of stilts.

The deaths of stilts, by whatever reason or cause, decrease the population levels of the species.

QUESTION NO. 16 - What are the environmental impacts of surface water runoff that is contaminated from the acres and acres of rental cars so close to the ocean. And from the toxic substances that accumulate on the runway itself.

The potential effects of increased surface water runoff are discussed in Section 3.8 of the Draft EIS. Based on the water quality monitoring conducted specifically for the Draft EIS, as well as that conducted for previous studies, airport operations have little effect on the nearshore marine environment. The proposed airport drainage system improvements have been planned and designed to alleviate potential adverse effects of increased surface water runoff. Equipment wash areas will be equipped with appropriate waste wash water collection and treatment facilities and erosion control and sediment retention basins will be used to minimize sediment flow into Kalia Inlet Gulch.

QUESTION NO. 17 - What would be the impacts of the increasing water use on our already overburdened water system if no new water sources are found.

The potential effects of the proposed project on the island's water supplies is discussed in Section 3.22.1 of the Draft EIS. As indicated, airport water demand, as a percentage of the total water consumption, will essentially remain unchanged, slightly more than one percent increase. Other increases in water demands are expected to occur regardless of the Proposed Project.

COMMENT MW-6 - Comparative Cost Analysis of Public Transportation System versus the Proposed \$50,000,000 Roadway and Cloverleaf Overpass.

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The probability of an emergency fuel drop over Kanaha Pond Wildlife Sanctuary is remote, given the close proximity of the Sanctuary to the airport. Should an emergency fuel drop occur, it would most likely be over the ocean and not land. Further, the chances of fuel reaching the ground in large enough quantities to affect the wildlife are also remote in that the majority of the fuel rapidly evaporates and never reaches the ground.

QUESTION NO. 13 - What would be the cumulative effects of increasing industrialization near the Sanctuary including: industrial noise and lights, industrial chemical usage including gasoline, oil and detergents and solvents used in rental car operations.

Increased industrialization near the airport is controlled by the County Council through the zoning code. The use of potential hazardous materials is controlled by the State Department of Health. It can be expected that these regulatory bodies will carefully monitor their respective areas of responsibility so that only those types of activities allowed will be approved and that hazardous materials will be used and disposed of properly. Increased noise and lights on the wildlife of Kanaha Pond Wildlife Sanctuary has been studied and is described in the Draft EIS in Sections 3.2, 3.11.2 and Appendix J. In general, birds and other wildlife become habituated to the noises and are not adversely affected. The observations conducted for the Draft EIS indicated that there was no change in bird habits or reactions to increased numbers of overflights. Similarly, the light emissions impacts resulting from the Proposed Project are considered to be insignificant.

As indicated in the Draft EIS (see Section 3.20), the future quantities of waste wash water generated by rental car agencies are estimated to be approximately the same as at present. Waste wash waters from all sources are directed to oil/water separation systems prior to disposal per federal and state codes, rules and regulations. As new facilities are constructed, appropriate wastewater treatment facilities will be built into the new facilities.

QUESTION NO. 14 - Endangered Hawaiian Stilts have been killed by airplanes at Kahului, how will these deaths be prevented in the future.

As indicated in the Draft EIS (see Section 3.11.2.1), to reduce the number of stilts on the airfield and to minimize the

Ms. Masako Westcott
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AIR-EN
96.503

Ms. Masako Westcott
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Alternative surface transportation methods, including a public transportation system, are described in Section 4 and Appendix P of the Draft EIS. The primary alternative considered was the use of Travel Demand Management (TDM) measures, in conjunction with the at-grade intersection. TDM measures are used to reduce vehicle travel during the peak traffic hours and include ride sharing, public transportation and staggered or flex-time work hours. The evaluation concluded that TDM measures already exist at Kahului Airport due to the characteristics inherent to Airport operations. It is unlikely that increase TDM measures would reduce the peak hour travel through the Hana Highway-Airport Access Roadway intersection to effectively increase the Level of Service. Therefore, the alternatives investigated are not considered to be a reasonable or viable alternative.

The visual effects analysis included in the Draft EIS (see Section 3.21) were conducted using the same criteria used by the County in the development of the County's Scenic Resources Study. As indicated in the Draft EIS, the most important visual resources will retain their existing high visual qualities. Also, as noted in the Draft EIS, the proposed Airport Access Road interchange with Hana Highway may affect the visual quality of the mauka view of Haleakala from the highway, but is not expected to affect the visual quality of the mauka view of the West Maui mountains.

QUESTION NO. 19 - Whose opinion is it that the urbanization of 700 acres, more than a square mile of prime agricultural land, is insignificant.

The criteria used to define significance of farmland loss are described in Section 3.17.3 of the Draft EIS.

QUESTION NO. 20 - By what standards was this judgement made.

Guidance in establishing and applying the criteria was obtained from the U.S. Department of Agriculture, Soil Conservation Service. Similar analyses will be conducted in the future for the farmland for the parallel runway and associated facilities prior to the construction of those facilities, as these lands will remain in agricultural production until needed for airport related functions.

QUESTION NO. 21 - How much public money was spent to prepare the Draft EIS.

No State General Fund monies were used for the preparation of the Draft EIS. The monies used for the preparation of the Draft EIS

are from the Federal Airport and Airways Development Act and the State's Airport Special Fund. These funds were generated from fees on airline tickets, commercial aircraft landing at the State's airports, airport concessionaires rents, and other aviation user fees. These funds are to be used for airport purposes, as stated in the Airport and Airway Improvement Act of 1982, as amended.

If you have any questions, please contact Ben Schlapak, Head Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

c: Federal Aviation Administration (D. Welhouse)

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96.503

1-17

DEPARTMENT OF TRANSPORTATION
HONOLULU, HAWAII



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
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MAUI OFFICE
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May 21, 1996
461 Laulea Pl.
Paia, HI. 96779

Office of Environmental Quality Control
State Dept. of Health
Central Pacific Plaza, 4th Floor
220 S. King
Honolulu, HI. 96813

Re: DEIS Kahului Airport

I want to be on record as opposing the acceptance of the recent DEIS for the further expansion of Kahului Airport. There is such a long list of negative impacts on the Maui community that were either ignored or misinterpreted, that few benefits to the Maui community remained. However, bureaucratic ideology appears to be holding sway. I strongly protest this attitude. The constituency that is pushing the airport expansion goes against common sense.

Recently I traveled to the mainland and noted that airports in San Francisco and San Diego are almost interchangeable with Honolulu and what is being done on Maui. This is poor planning. Maui is a unique destination and the current plans will over a period of time, eliminate the qualities of safety and beauty which attract visitors.

Experts have testified as well to the loss of native ecosystems which would be irreversible. Its too bad that government employees who determine policy aren't required to take an oath as do medical doctors, "to do no harm". If the proposed expansion of Kahului airport goes forward, irreversible harm to the environment will occur, leaving Maui to be another tatty, glitzy tourist spot. Not the lovely place we who have lived here for decades love and cherish.

With hopes for better thinking.

Barbara Woods

cc. David Welhouse FAA
Owen Miyamoto
Maui News

Ms. Barbara Woods
461 Laulea Place
Paia, Hawaii 96779

Dear Ms. Woods:

Subject: Comments on Draft Environmental Impact Statement (EIS) Kahului Airport Improvements, Kahului, Maui State Project No. AM1011-07

Thank you for your comment letter of May 21, 1996, on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT BW-1 - Purpose of the Proposed Project

As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and state; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands.

COMMENT BW-2 - Impact of Proposed Project on Ecosystems

The potential effects of the Proposed Project on biotic communities is discussed in Section 3.11 of the Draft EIS. In brief, the Proposed Project will result in the loss of Cane Field/Ruderal Border, Koa Haole/Mixed Understory, and some Open

See Comment #1

Grassland vegetative zones. These vegetative zones are primarily habitat for introduced bird species. Similarly, the Proposed Project will affect feral mammals that inhabit the agricultural areas where the parallel runway will be constructed. The feral mammals are also introduced species.

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations, general economic conditions, and the

marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that is prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

The potential effects of the Proposed Project on the marine environment is discussed in Section 3.11.4 of the Draft EIS. As indicated, the Proposed Project will not directly impact the marine environment and there will be insignificant or no effects on water quality or runoff.

KAUHAUOAHUA
MAIL CENTER
GENERAL DIRECTOR
HARRIS M. CHAMBERS
DRIAN K. MINARI
MAIL ROOM
AIR-EN
97.936



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
860 PUNICHOBYL STREET
HONOLULU, HAWAII 96813-5087

August 20, 1997

Ms. Florence M. Waldow
114 N. Kuikini #1009
Honolulu, Hawaii 96817-2443

Dear Ms. Waldow:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of May 3, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT FMW-1 - Introduction of Alien Species

The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the Federal Aviation Administration (FAA) and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and

DEPARTMENT OF TRANSPORTATION
HAWAII



*Mr. David J. Waldow
Federal Aviation Administration
Airports District Office
Box 50244
Honolulu, HI 96850*

*Ms. Florence M. Waldow
114 N. Kuikini #1009
Honolulu, HI 96817-2443*
*57-3077
HONOLULU
SEP 14*
It is not necessary to include the alien species issue in the EIS. The issue is covered in the HDOT's EIS for the proposed Kahului Airport Improvements. The issue is covered in the HDOT's EIS for the proposed Kahului Airport Improvements. The issue is covered in the HDOT's EIS for the proposed Kahului Airport Improvements.

See Comment 1
See Comment 2
See Comment 3

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Submitted to Mr. Steve Higashi

candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, it will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following:

availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix B of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS to be consistent with the requirements and procedures of 50 CFR 402.12. The biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS

regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and COAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion prepared by the FWS in response to the biological assessment will be included as an appendix to the Final EIS and the mitigation measures summarized in the Final EIS. (See attachment "mitigation measures")

COMMENT FMW-2 - Inspection and Quarantine Facilities

The HDOT, Airports Division, is committed to the design and construction of a new air cargo building as part of the Proposed Project. This building will be planned and designed in consultation with the U.S. and State Departments of Agriculture and U.S. Customs Service. The purpose of consulting these agencies is to assure the new facility contains the equipment and facilities they require to improve their inspection and quarantine procedures at Kahului Airport. This measure is one of the mitigation measures proposed in the Alien Species Biological Assessment noted above.

COMMENT FMW-3 - NPS Participation in Preparation of Draft EIS

We, too, value the NPS's expertise on ecosystem issues and Haleakala National Park. Although the NPS was not formally designated as a cooperating agency for the preparation of this EIS, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, and has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, have used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS is a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

Ms. Florence M. Waldow
Page 4
August 20, 1997

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97.936

If you have any questions, please contact Ben Schlapak, Head
Planning Engineer, of our Airports Division at (808) 838-8821.

Very truly yours,



KAZU HAYASHIDA
Director of Transportation

Attachment: As noted above

cc: Federal Aviation Administration (D. Welhouse)

Handwritten text, possibly a list or index, oriented vertically on the left side of the page. The text is difficult to decipher due to the image quality and orientation.



JUL 20 1938

17 June 1996

Mr. David Wellman
F.A.A. Airports District Office
Honolulu, HI

Dear Mr. Wellman -
As quite normal it a
wonder day.

Your Air carrier is rapidly
approaching the Kahului Airport.
Your flight attendant
wonderfully instructs you on
returning your seat up right
and to buckle your seat belt.

Upon first touch of the
wheel on the ground your
carrier will make braking
lightly to full blast. The
plane rattles - you hope pieces
of the plane don't fall apart.
As a frequent flyer, you
know just about where the

runway ends. Fortunately this
flight ended without incident.
This is a constant occurrence.
The Kahului Airports main
runway of tension, controversy is
not a topic about whether there is
a definite need for me.
It's about human life. Safety
is the word.

At the recent MCC-TV telecast
where the panel mostly expressed
oppositers to the runway extension -
I didn't see representatives from
the FAA - The pilots and airport
division, missing their opinion.
These are the people that are aware
of the situation.

Representatives from these groups
should be heard.
Life is precious.

Sam J. Yamada

See Comment TTY-2
See Comment TTY-1

Mr. Tim Yamada
Page 2

Mr. Tim Yamada
Mailing Address Unknown

Dear Mr. Yamada:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your comment letter of June 17, 1996 on the Draft EIS for the proposed Kahului Airport Improvements. This letter is in response to your comments, which are attached for reference.

COMMENT TY-1 - Airport Safety

The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix N ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current Federal Aviation Administration (FAA) standards; (ii) eliminating the trees which penetrate the approach surface to Runway 20; (iii) lengthening the runway for landings and aborted takeoffs; (iv) enlarging and relocating the displaced landing threshold for Runway 2; and (v) relocating the helicopter operations to a site further away from Runway 2-20.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights, reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing the amount of time aircraft spend circling the Airport, which, in turn, decreases that number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport.

For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

COMMENT TY-2 - Public Participation in EIS Process

The U.S. and State of Hawaii EIS process encourages all segments of society to participate in the discussion of the pros and cons of privately and publicly proposed projects. As the proponents of the Proposed Project, the FAA and the State Department of Transportation (HDOT), Airports Division, have proposed the Proposed Project, as indicated in the Draft EIS (see Section 2.3), to (1) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (2) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the Year 2010 in a manner which accommodates existing and forecast aviation demands. The Proposed Project will allow the airport to operate more efficiently and provide both residents and visitors a more pleasurable experience in keeping with the Aloha spirit of the islands. In general, the pilots who fly in and out of Kahului Airport are in favor of the Proposed Project and have made their support known to the FAA and HDOT, Airports Division.

AIR-EN
96.500

May 15, 1996

Mr. Kendrick Yee,

First Dept's efforts toward this EIS is commendable!
Please, keep up the good work!

The exhibition by the majority of speakers in opposition of the EIS was basically an endorsement! Not as they. The kind of majority, faked solely by unqualified emotion, truly reflects what your department is dealing with... shall we cooperate with my little word of reality.

Don and I raised in Hawaii, it was an endorsement witnessing the hypocrisy conveyed throughout the evening. It is apparent many the easily fooled & their intentions open to Hawaii, and 2) the common sense of their duty in Hawaii.

Consequently, the speakers endorsing your EIS provided well organized, logical statements, with factual justification. It is obvious they were the minority, outnumbered by those who simply appeared thoughtful and endorsing themselves and others opposite.

Fortunately, students are not exposed to this endorsing display. If they do, would they identify contrasting words of logic - and maybe some sense. For me, it's obvious, that your film has in the endorsed planned development of our State - as exhibited by the EIS. As usual, keep up the good work!

Sincerely,
Kendrick Yee

Mr. Kendrick Yee
Mailing Address Unknown

Dear Mr. Yee:

Subject: Comments on Draft Environmental Impact Statement (EIS)
Kahului Airport Improvements, Kahului, Maui
State Project No. AM1011-07

Thank you for your support for the proposed Kahului Airport Improvements as indicated in your letter of May 15, 1996. Your letter, and this response, will be included in the Final EIS.

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RESPONSES TO PUBLIC HEARING TESTIMONY

The following responses are to the written and verbal testimony received at the Public Hearing on May 8, 1996 for the Kahului Airport Draft EIS. The response identifier, PH-number, corresponds to the comment identifier in the margin of the court reporter's transcripts of the Public Hearing (following this section).

PH-1 - Alien species

RESPONSE: The alien species issue is summarized in Sections 3.11.3.1, 5.1.5.1 and 8.2.5.10 of the Draft EIS. The discussion includes the recommendations from the Alien Species Action Plan (ASAP) Project. The ASAP is included in Appendix Q of the Draft EIS. The ASAP Project was made up of at least 20 state, federal and private organizations, including: The Nature Conservancy of Hawaii, Department of Agriculture, Department of Interior National Park Service (NPS), Department of Interior Fish and Wildlife Service (FWS), and the Hawaii Department of Transportation (HDOT). An outcome of the ASAP Project was the formation of the Coordinating Group on Alien Pest Species (CGAPS), of which the HDOT is a member. Other members include the NPS, FWS, The Nature Conservancy of Hawaii, State and Federal Departments of Agriculture, Department of Land and Natural Resources, U.S. Postal Service, Hawaii Department of Health, U.S. Customs Service, U.S. Navy, Hawaii Farm Bureau, and the Hawaii Visitors Bureau.

In 1995, the FAA and the HDOT initiated early and informal consultation with the FWS regarding the potential impacts of the Proposed Project on the listed and candidate species and designated and proposed critical habitat. This consultation was to determine whether any such species or habitat were likely to be adversely affected by the Proposed Project. During this informal consultation, the FWS indicated that it would need to review the analysis provided in the Draft EIS in order to determine whether additional consultation would be required.

On March 1996, FAA and HDOT issued the Draft EIS for the Proposed Project. The analysis performed in conjunction with the Draft EIS concluded that the Proposed Project does not induce growth. In addition, the Draft EIS concluded that the future expansion of domestic or international service could occur with or without the Proposed Project and is beyond the control of the FAA and HDOT. Therefore, to the extent there may be an increase in the introduction rate of alien species to Maui in the future, the increase will not necessarily be a direct result of the Proposed Project. Rather, the future expansion of domestic and international service will be a result of many factors which contribute to an airline's decision to provide service to an area including, but not limited to the following: availability of hotel accommodations; general economic conditions; and the marketing scenarios. These conclusions on the growth impacts are discussed in Section 6.0 and Appendix E of the Draft EIS. In addition, the issue of growth impacts related to alien species is discussed in Section 3.11.3.1 of the Draft EIS. The analysis in the Draft EIS concluded that there is an existing problem on Maui as well as in the rest of the State regarding the introduction of alien species. Because the Proposed Project may impact the introduction rate of alien species, the Draft EIS determined that the introduction of alien species is a potentially significant cumulative impact.

The FWS submitted written comments in response to the Draft EIS. The key issue of concern identified by the FWS was how the Proposed Project may increase the introduction rate of alien species to the airport environs and the impact this introduction may have on the listed or candidate species. The FWS recommended that the FAA prepare a biological assessment for the Proposed Project pursuant to the requirements of 50 CFR 402.12 on these issues.

As a result of meetings with the NPS and FWS, the FAA and HDOT have prepared a biological assessment in cooperation with the FWS consistent with the requirements and procedures of 50 CFR 402.12. The

biological assessment summarizes the information that is available regarding the introduction of alien species, including information from the ASAP, and recent studies. This information was provided in connection with the Draft EIS regarding its analysis of the potential impact the Proposed Project may have on the introduction rate of alien species to Maui.

Based upon the analysis provided in the Draft EIS, and as discussed in the ASAP Project and CGAPS, appropriate mitigation measures that are reasonable, feasible and prudent have been discussed in detail in the biological assessment. A copy of the biological assessment and the biological opinion that has been prepared by the FWS in response to the biological assessment is included in the appendix to the Final EIS and the mitigation measures are summarized in the Final EIS.

PH-2 - Socio-economic and Growth Impacts

RESPONSE: The growth inducing impacts of both the Proposed Project and international flight operations were comprehensively studied in the "Socio-economic Impact Assessment of Proposed Kahului Airport Master Plan Improvements" (the SIAR), attached as Appendix E to the Draft Environmental Impact Statement (DEIS).

Information from the SIAR was summarized and incorporated into the following sections of the DEIS: Section 3.5 (Socio-Economic Impacts), Section 3.6 (Secondary (Induced) Socio-Economic and Economic Impacts), and Section 6.0 (Growth Inducing Impacts). The SIAR also analyzed the specific growth inducing impacts associated with international flight operations at Kahului Airport. This analysis was summarized and incorporated into Section 6.0 (Growth Inducing Impacts) and Section 8.2.5.22 (Growth Inducing and Cumulative Impacts of International Flight Operations).

The purpose of the SIAR was to determine whether the Proposed Project and/or international flight operations will cause an increase in the number of visitors coming to Maui and, by extension, increase the population, number of jobs, economic activity, etc. beyond that which would occur if the Proposed Project were not implemented and international flights were not capable of being accommodated.

The SIAR focused on the possible impacts caused principally by growth in the visitor industry attributable to lengthened runways and international arrival facilities; as these two facilities have the greatest potential to induce growth. It should be noted, however, that international arrival facilities are not part of any Master Plan alternatives, including the Proposed Project. They are studied in the SIAR and discussed in the DEIS in response to a court order requiring an evaluation of internationalization.

After analyzing the lengthened runway and international arrival facilities within the context of the Hawaii tourist industry, and after interviewing numerous travel experts, the consultants who prepared the SIAR concluded that neither component will generate significant long-term growth on Maui. According to the SIAR, infrastructure such as the lengthened runway does not induce growth. The analysis in the SIAR also concluded that the near term effects of direct international flights would not be large (an increase of about 10 percent) as Japanese tourism is a fairly small part of Maui's visitor industry. The analysis further concluded that the potential growth impacts can only be achieved if local government issues additional permits for resort unit development.

Within the State of Hawaii itself, there are several examples where new facilities have generated little or no growth. The Hilo International Airport is an illustration of this situation. Hawaii has also experienced situations where growth occurred despite the fact that the existing facilities could not accommodate the increase in people and traffic. Kahului Airport itself was placed in this position in the 1980s when tourism grew rapidly and out paced improvement efforts at the Airport.

the so-called Cities Program in limited situations. The terms of any bilateral agreements vary greatly from country to country, and new agreements are negotiated with countries on an ongoing basis.

Current bilateral agreements between the United States and Japan allow Japan Airlines (JAL) to provide one-stop service from Tokyo to Kahului with a stopover in Honolulu. Up to this point in time, JAL has elected not to fly to Kahului, choosing instead to terminate its flights at Honolulu and switching Maui-bound passengers onto Hawaiian Airline's interisland flights. Recently, however, JAL has expressed its intention to access its right to make one-stop, direct flights to Kahului Airport. This could be performed without lengthening the runway or increasing the pavement strength at the airport. However, interim international arrival facilities may have to be installed. The decision to initiate one-stop service to Maui is a business decision that is made by JAL and is beyond the control of the State of Hawaii Department of Transportation and the Federal Aviation Administration. Furthermore, the one-stop flights from Japan proposed by JAL can and would occur regardless of the Proposed Project.

PHI-5 - Environmental Impact Analysis

RESPONSE: The impact analysis on environmental categories such as noise, air and water are presented in Chapter 3.0 (Affected Environment, Probable Consequences and Mitigation Measures) of the Draft EIS for the Proposed Project and in Chapter 4.0 (Alternatives to the Proposed Project) for the alternatives to the Proposed Project. In addition, detailed technical studies are presented in the appendices for noise, land use, socio-economic, air quality, water quality, archaeology, flora, fauna, hazardous material, infrastructure, surface transportation and aviation.

PHI-6 - Aviation Forecast and Project Phasing

RESPONSE: The aviation demand forecast has been incorporated by reference and discussed in Section 1.8.3. The aviation demand forecasts were prepared as part of the Statewide Airport System Plan and not specifically for the Environmental Impact Statement (EIS). An EIS may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public. Incorporation by reference is a procedure for reducing the size of EISs and is particularly appropriate for long, descriptive, or technical materials. When a document is incorporated by reference in an EIS, the lead agency must make the document available for inspection at its offices. However, at the request of the public, the "Update of Aviation Demand Forecasts" will be included as an Appendix to the Final EIS. Also, upon request, the DOT has made copies of the updated aviation forecasts available to the public.

The updated forecast show that the proposed facilities, which were planned to meet the forecast aviation demand, would be needed approximately six (6) years later than planned in the Kahului Airport Master Plan. The Project Phasing, which indicates when the projects are scheduled for construction, is presented in Section 2.5. The various improvement projects proposed for Kahului Airport have been categorized as short-term (Phase 1), medium-term (Phase 2) and long-term (Phase 3). The categorization of the projects is based on the existing and forecast demand. Obviously, the Phase 1 improvements are needed to meet existing demands and deficiencies, and the Phase 2 and Phase 3 projects are required to meet the aviation demands anticipated for that time frame. At this point in time, it is certain that the fuel pipeline may be a project beyond the 2016 planning horizon. The long-term (Phase 3) projects include the parallel runway, the transient apron, the permanent relocation of helicopter operations, and the fuel supply pipeline from the Harbor to the Airport Bulk Fuel Tanks.

Typically, the actual design for these improvements, especially those which are aviation demand related, will be initiated as the actual aviation demand exceeds critical demand levels, generally 75 percent or greater of design capacity, and when the necessary funding is available.

APPENDIX V - Public Hearing Response - 4

Ultimately, the SIAR concluded that growth on Maui, if it is to occur, will take place as the result of factors not related to the Proposed Project or to international arrival facilities. This conclusion is based upon the analyses summarized and discussed in the SIAR, including the following facts:

- There are no approved or pending projects (other than airport projects) whose construction is contingent upon the Proposed Project.
- Although the existence of an adequate airport is one of many factors which contribute to an area's economic vitality, there are no data which suggest that this Proposed Project would lead to future islandwide growth. In other words, this project alone would not induce new businesses or residents to locate in Maui or more tourists to come to Maui. Other more critical factors would include such items as the availability of housing and the labor pool. On the other hand, failure to implement this project might induce some existing businesses to consider relocating out of Maui and may result in a reduction in the tourism industry on Maui.

Note that the SIAR, in addition to evaluating the "most probable" growth inducing impacts of the Proposed Project, conducted a sensitivity analysis to determine the "potential maximal" growth inducing impacts of the project. In performing this sensitivity analysis, the SIAR made a number of "worst case" growth assumptions regarding tourism and air travel to Maui. These assumptions were designed to maximize the growth results.

Ultimately, the "maximal growth" sensitivity analysis -- despite producing growth numbers which could be judged technically "significant" -- confirmed the SIAR's initial conclusion that the Proposed Project would have little or no impact on growth. The SIAR also compared the growth forecasts of the Maui County Community Plans against those found in the State of Hawaii, Department of Transportation's (HDOT) "Updated Aviation Demand Forecasts." The comparison showed that the visitor growth rates used by HDOT and Maui County are very similar.

For an expanded discussion of the growth inducing impacts of the Proposed Project and international flight operations, please consult the SIAR (Appendix E), and Sections 3.5, 3.6, 6.0 and 8.2.5.2.2 of the DEIS. The SIAR also includes a complete description of its methodology and assumptions.

PHI-3 - Recreational Impacts

The impact of recreational facilities is discussed in Section 3.22.7 in the Draft EIS. The Proposed Project will have a positive impact on beach facilities as the expansion of Kanaha Beach Park is part of the Proposed Project, and it will increase parking facilities and public accessibility to the beach. The Proposed Project will not increase and may potentially have a positive aircraft noise impact on Kanaha Beach Park.

PHI-4 - Internationalization of Kahului Airport

RESPONSE: The issue of Internationalization and International Flight Operations is discussed in Section 6.5.2, Section 8.2, Appendix E and Appendix N of the Draft EIS. In addition, internationalization can occur with or without the Proposed Project.

International service is different from domestic service in that airlines must receive government approval through the U.S. State Department and U.S. Department of Transportation, to fly a given international route before the flights can begin. International air service routes are generally negotiated between the U.S. and foreign governments, they may sometimes be provided on the basis of comity and reciprocity in the absence of an agreement, and some foreign air carrier operations to U.S. airports may be authorized by exemption under

APPENDIX V - Public Hearing Response - 3

PHI-7 - Noise Impacts

RESPONSE: A detailed aviation and ground noise analysis for the Proposed Project was performed for this Environmental Impact Statement and presented in Section 3.2, and Appendix C. The analysis applied both the DNL and SENEL noise metrics to aircraft noise at Kahului Airport.

The 60 dB Day-Night Noise Level (DNL) standard is mandated by the State of Hawaii. The FAA and other Federal agencies use 65 DNL for noise land use compatibility guidelines, but allow local authorities to establish different guidelines. However, the Draft EIS recognizes that DNL is not universally accepted as an all-encompassing measure of noise impact. Therefore, the Draft EIS presents noise analyses in the additional metric of Single Event Noise Exposure Level (SENEL).

DNL is a single number, cumulative noise metric which accounts for noise level, noise duration, number of noise events and time-of-day the noise events occur. SENEL is a single number noise metric for individual, discrete noise events which accounts for noise level and noise duration. SENEL values over a 24-hour period can be used to compute a daily DNL value. DNL and SENEL data are found in Appendix C.

It should be noted that the most common method of correlating changes in the number of aircraft operations with changes in single event noise is through the use of a cumulative noise exposure metric such as DNL. In fact, the only successful correlation of noise with human response has been in terms of such cumulative noise metrics, such as DNL. Cumulative noise metrics account for: (i) the change in number of operations; (ii) the change in single event noise levels; and (iii) the time of day that a given noise event occurs. The relationship between frequency of noise events and human response to noise is discussed in the 1992 FICON report which recommends that cumulative noise metrics be used as the basis for environmental noise analyses. However, supplemental metrics, such as single event noise (SENEL) may be used to assist in the description of potential noise impacts. This was the strategy used in the Draft EIS, and special care was taken to present multiple analyses. The result show that the Proposed Project will not significantly increase the noise exposure in the Spreckelsville area.

The ground (surface transportation) noise analysis was performed using the Federal Highway Administration (FHWA) Noise Prediction Model and Guidelines. The surface transportation noise levels are based on the peak one-hour equivalent noise level. The Proposed Project has the potential of decreasing noise level for the residences along Dairy Road. However, even with the Proposed Project, the noise level at these residences exceed the FHWA guidelines, therefore, mitigation measures are proposed in the Draft EIS.

PHI-8 - Airfield Capacity Problem

RESPONSE: As stated in Section 1.8.3, the new aviation forecasts show that the need for the capacity related improvements are needed, at least six (6) years later than planned in the Kahului Airport Master Plan. Therefore, the parallel runway should not be needed before the year 2016. The Draft EIS discussed and analyzed the use of a reliever airport for general aviation in Section 4.4.3, Section 4.4.4 and Appendix R. The conclusion, was that the construction of the parallel runway at Kahului is more feasible than constructing a general reliever (utility) airfield or a transport airport at Puuene (the site of the old Maui Airport). In addition, significant environmental impacts would occur, if a reliever airport is built in the Puuene area, in impact categories of land use, flora and fauna, surface transportation, water quality and public services. In addition, there would be aeronautical conflicts with Kahului Airport.

PHI-9 - Archaeological Impacts

RESPONSE: The Draft EIS addresses the archaeological impacts of the Proposed Project in Section 3.10. The Draft EIS concluded that the Transit Apron will impact a known archaeological site, and therefore, provided mitigation to this impact. The proposed mitigation was to relocate the transit apron, however, DOT in coordination with the Department of Land and Natural Resources, Historic Preservation Office (SHPO) and the Maui/Lanai Buri Council has developed a Preservation Plan for this archaeological site (Site 1798) which includes the resizing of the transit apron, and additional measures to protect the site. In addition, the FAA and SHPO have entered into a Programmatic Agreement, and in consultation with the Advisory Council on Historic Preservation, HDOT, Maui/Lanai Islands Buri Council, and the Office of Hawaiian Affairs, to address additional archaeological data surveys for the future proposed airport facilities.

PHI-10 - Kanaha Pond Wildlife Sanctuary

RESPONSE: The potential impacts of the Proposed Project on the Kanaha Pond Wildlife Sanctuary (KPWS) are addressed in Section 3.12 of the Draft EIS. The Proposed Project will not directly impact the KPWS or wetlands in the airport area. There may be a brief period of overflights of KPWS for the construction of the Runway 2-20 extension, and this impact on the endangered birds in KPWS is insignificant and is discussed in Section 3.11 and Appendix J. The FWS has concurred with the conclusions of the Draft EIS, in respect to the impact of the Proposed Project to endangered species which use KPWS.

PHI-11 - National Park Service, Cooperating Agency Status and Participation

RESPONSE: The NPS was not formally designated as a cooperating agency for the preparation of this EIS, however, the FAA and HDOT, Airports Division, provided the NPS with numerous opportunities to provide input during the EIS process. The NPS has been an active participant in the EIS process, has provided information for the preparation of the EIS, and has reviewed the Draft EIS. The FAA and HDOT, Airports Division, has used the information provided by the NPS in the preparation of the Draft EIS consistent with their responsibilities as lead agencies.

In addition to their participation in and review of the Draft EIS, their expertise was sought in the development of the information included in the biological assessment on the alien species issue. The NPS was a member of the Biological Assessment Technical Panel and has provided scientific reference materials as well as direct experience in the area of alien species impacts and control.

PHI-12 - Surface Transportation

RESPONSE: The impacts of the Proposed Project on Surface Transportation in the Airport's environs is addressed in Section 3.22.8 of the Draft EIS. The detailed analysis on surface transportation is included in Appendices M and P of the Draft EIS. The addition of the Airport Access Roadway to Maui's infrastructure will improve the circulation within the Airport's environs and relieve congestion. However, with the projected growth in the background traffic, many of the intersections will be operating with poor levels of service with or without the Proposed Project.

The surface transportation impacts due to the No-Action Alternative is summarized in Section 4.2.22 and presented in detail in Appendices M and P of the Draft EIS.

PHI-13 - Impacts on the Native Hawaiians

RESPONSE: The impact of the Proposed Project on the issues, such as socio-economic, historical and archaeological sites, recreation, flora and fauna are summarized in Section 3.0 of the Draft EIS. Impacts on cultural resources are discussed in Section 3.10 of the Draft EIS. The growth inducing impacts are discussed in Section 6.0 of the Draft EIS and in Response PHI-2, above. The issue of Hawaiian sovereignty is considered in the Draft EIS as an area of controversy. At this time, Hawaiian sovereignty is a concept under discussion within the Hawaiian community. Since the concept of Hawaiian sovereignty is still under development, the effect of the Proposed Project on it is unknown.

PHI-14 - Purpose and Need of the Proposed Project

RESPONSE: As indicated in the Draft EIS (see Section 2.3) the purposes of the Proposed Project are to: (i) create an airport infrastructure which will support the present and future goals and objectives of the county and State; and (ii) to continue to provide safe, efficient, economical, and convenient air transportation facilities for passenger and air cargo service to the residents of, and visitors to, the State and Maui through the year 2010 in a manner which accommodates existing and forecast aviation demands.

PHI-15 - Accommodating Cargo on Departing Aircraft

RESPONSE: As stated in Section 2.32, "Providing Safe, Efficient, Economical and Convenient Air Transportation Facilities." The existing runway is not long enough and does not have adequate strength to allow the existing flights from Kahului to the West Coast or other mainland hubs to depart with a full load of passengers, cargo and fuel. The additional runway length and strengthening of Runway 2-20 will permit the Airport to: (i) better accommodate those air carriers which currently serve destinations outside the State of Hawaii, including mid-west, east coast and future international hubs; (ii) better accommodate future projected increases in passengers and cargo leaving Maui for destinations outside the State of Hawaii; and (iii) improve the efficiency and flexibility of aircraft use at the Airport and within the State. The analysis in Appendix N shows the weight penalties for various aircraft which may use Kahului Airport for different runway lengths, including the No-Action, 8,500 feet, and 9,600 feet.

PHI-16 - Aviation Safety

RESPONSE: The subject of aviation safety is discussed in Section 3.22.9 and in Section IV of Appendix N ("Aviation Studies") of the Draft EIS. The Proposed Project will have a positive impact on aviation safety as it will increase the safety at the Airport by: (i) widening the runway safety areas to meet current Federal Aviation Administration (FAA) standards; (ii) eliminating the trees which penetrate the approach surface to Runway 20; (iii) lengthening the runway for landings and aborted takeoffs; (iv) enlarging and relocating the displaced landing threshold for Runway 2; and (v) relocating the helicopter operations to a site further away from Runway 2-20.

In addition, on page 2-22, the Draft EIS points out that the reduction of one-stop travel to Honolulu for overseas flights reduces the likelihood of air-to-ground and ground-to-air mishaps. The Proposed Project is also expected to reduce airspace congestion and flight delays at Kahului by decreasing the amount of time aircraft spend in the air, and decreasing the number of aircraft in the airspace. Reductions in airspace congestion will improve the margin of safety at Kahului Airport. For an expanded discussion of the safety benefits of the Proposed Project please refer to Sections 2.3.2 and 3.22.9, and Section IV of Appendix N of the Draft EIS.

PHI-17 - Impacts on Sewage System

RESPONSE: The impacts on the sewage system (wastewater system) due to the Proposed Project is discussed in Section 3.22.2 and Appendix L of the Draft EIS.

PHI-18 - Impacts on Water System

RESPONSE: The impacts on the water system due to the Proposed Project is discussed in Section 3.22.1 and Appendix L of the Draft EIS. The conclusion of the analysis in the Draft EIS, is that the Proposed Project will have an insignificant impact on the water supply on Maui as the Airport water demand is only about 1 percent of the total of water consumption. However, as Maui County has a water supply problem, the Draft EIS, does list the impact on the water supply as a significant cumulative impact in Section 5.1.4. The Proposed Project includes the installation of a non-potable water system for landscape irrigation, and use salt-tolerant and drought resistant plants when applicable. In addition, the new water lines will rehabilitate the existing water lines, thereby alleviating the water leaks within the existing Airport water distribution system.

PHI-19 - Airport Funds

RESPONSE: As stated in Section 2.5, the funds for the Proposed Project, with the exception of the aircraft fuel facilities, will be funded by federal funds through the FAA and state airport funds. The airport operations or derived from Airport revenues and are part of the Airport Special funds. The airport operations or improvements are not funded through the State of Hawaii General Fund.

As stated in the Airport and Airway Improvement Act of 1982, as amended [49 USC Section 47017 (b)], "all revenues generated by the airport, if it is a public airport, and any local taxes on aviation fuel (other than taxes in effect on the date of the enactment of the Airport and Airway Safety and Capacity Expansion Act of 1987) will be expended for the capital or operating costs of the airport, the local airport system, or other local facilities which are owned or operated by the owner or operator of the airport and directly and substantially related to the actual air transportation of passengers or property;

PHI-20 - Aviation Fuel Spills and Dumping

RESPONSE: The probability of an emergency fuel drop near Kahului Airport is remote. Commercial aircraft do not dump fuel except in cases of emergency, which are very rare. This is because commercial aircraft are designed to land with a wide range of fuel volume. In addition, fueling of commercial aircraft is done with a sophisticated vapor recovery system in place, and the fuel tanks on aircraft are pressurized shortly after takeoff and depressurized just before landing, as the landing gear goes down. The chance that the seals in the pressurization system will leak is slight, especially since these systems are checked on a regular basis.

There are operational procedures in effect at Kahului Airport to handle fuel spills and this will not be affected by the Proposed Project. Fuel spills at the bulk fuel facility are addressed in Section 3.8 of the Draft EIS.

PHI-21 - Impacts on the Marine Environment

RESPONSE: The impacts for the Proposed Project on the environment is discussed in Section 3.11.4 of the Draft EIS and in Section 4.0 for the alternatives. The draft EIS concluded that the impact of the Proposed Project is insignificant. In addition, the impacts on the nearshore marine water quality is discussed in Section 3.8 with the analysis results from water sampling for the nearshore marine area presented in Appendix G. The aircraft noise effects on the marine life is discussed in Section 3.2 and Appendix C.

PH-22 - Agencies which were Consulted

RESPONSE: The agencies consulted during the preparation of the EIS is presented in Section 1.3.2 and Section 10.0. The agencies consulted included the: U.S. Army Corps of Engineers; U.S. Department of Commerce; National Marine Fisheries; U.S. Department of Interior, Fish and Wildlife Service; State of Hawaii, Department of Agriculture; State of Hawaii, Department of Land and Natural Resources; and the State of Hawaii, Department of Transportation, Highways Division. In addition as stated in PH-2 above, a Biological Assessment Technical Panel was formed and included representatives from the: Bishop Museum; County of Maui; Hawaii Department of Agriculture; Hawaii Department of Land and Natural Resources; Division of Forestry and Wildlife; Dr. Richard Lipsey, National Biological Service; National Park Service; The Nature Conservancy of Hawaii; U.S. Customs Service; University of Hawaii; Department of Botany; U.S. Department of Agriculture, Animal Damage Control; and U.S. Department of Agriculture, Plant Protection and Quarantine. If other individuals, agencies and organizations, which were contacted for the technical studies, they are listed in the corresponding appendices.

PH-23 - Land Ownership

RESPONSE: The land ownership and the affected properties are presented in Section 1.1, Section 2.1, and Section 3.3 of the Draft EIS. Section 2.1 gives a brief history of the Kahului Airport and the previous land owners. Briefly, the Federal Government transferred the Naval Air Station to the Territory of Hawaii at no cost. The land is owned in fee by the State and there are no Coded Lands within the Airport's boundary.

PH-24 - Light Emissions

RESPONSE: The impacts of the Proposed Project on the amount and type of light emissions is discussed in Section 3.19 of the Draft EIS. Mitigation measures have been proposed to minimize the spillover effect of the airport lights and be properly shielded to prevent intrusion into areas outside the airport areas.

PH-25 - Health Care Facilities

RESPONSE: The effect of the Proposed Project on health care facilities is discussed in Sections 3.22.5 and 5.1.4.3. The health care facilities on Maui are subject to insufficient funding, shortages of acute care beds and difficulties in hiring staff. The proposed airport improvements in and of themselves are not expected to affect or be affected by existing or planned health care services and facilities. The subject of Maui Memorial Hospital capacity has been and continues to be discussed by the State Administration and Legislature. It is recognized that improvements to the hospital are required, however, given present budget constraints, these improvements are not possible at this time.

PH-26 - State and County Plans

RESPONSE: A discussion on the relationship of the Proposed Project to the goals and objectives of the State and County is presented in Section 2.3.1 of the Draft EIS, and includes the applicable elements of the State Tourism Plan, State Transportation Functional Plan and the Maui County General Plan. In addition, a detailed discussion of the conformance of the Proposed Project to County and State Plans, Goals and Policies is presented in Sections 7.5 and 7.6.

PH-27 - Recycling

RESPONSE: Kahului Airport started a recycling program for glass and paper/cardboard products for airport users, tenants and airlines. However, due to a lack of volume the recycling of glass products was discontinued.

The recycling of the paper/cardboard continues, with pickup by private organizations for recycling. The green waste is collected and is hauled separately to the City and County Green Waste facility for recycling. This information will be included into Section 3.20 of the Final EIS.

PH-28 - Surface Water Runoff

RESPONSE: The proposed stormwater system improvements are discussed in Section 2.4.9 of the Draft EIS. The impacts on the Proposed Project on surface water runoff is discussed in Section 3.4.3.2 of the Draft EIS as it applies to the Marine Environment. Section 3.8 as it applies to Water Quality; Section 3.11.4 as it applies to the Marine fauna; Section 3.12 as it applies to Wetlands; and Section 3.13 as it applies to Drainage and Hydrology. In addition, as most nearshore waters in Hawaii exhibit high concentrations of certain water quality parameters due to surface runoff, the impacts are discussed as a significant cumulative impact in Section 5.1.4. The Airport is proposing the use of best management practices consistent with the State Department of Health rules and regulations and the State's non-point source pollution management program to minimize impacts during construction.

PH-29 - Fuel Pipeline from Kahului Harbor to the Airport

RESPONSE: As described in the Draft EIS (see Section 3.8), the proposed fuel pipeline will be designed and constructed in compliance with all applicable Federal and State codes, rules and regulations to prevent the contamination of soil, runoff and groundwater. These regulations include the State's Wastewater Management Regulations, Uniform Building Code, and National Fire Protection Association, 40 CFR 112, U.S. DOT Regulations, Title 49, Part 195 - *Transportation of Hazardous Liquids by Pipeline*.

Also, as indicated in the Draft EIS, the fuel pipeline from the harbor to the bulk fuel storage tanks is speculative at this time, and is proposed to be constructed some time after the year 2016. However, proper design of the pipeline, such as the use of a "quick flush" system, double walled pipes, and adequate sensors, will minimize any potential effects of an accidental spill should it occur. All applicable rules and regulations which are applicable at the time of design and construction of the fuel pipeline will be adhered to. Because of the speculative nature of the fuel pipeline at this time, additional future environmental analyses will be required and conducted prior to construction.

PH-30 - Cumulative Impacts

RESPONSE: The cumulative impacts of the Proposed Projects and the Alternatives are discussed in Section 5.0 of the Draft EIS. The discussion covers the new and proposed developments in the airport area and existing issues which are considered regional or statewide impacts.

PH-31 - Air Quality

RESPONSE: The impacts of the Proposed Project are discussed in Section 3.7 of the Draft EIS. The impacts of the No-Action and the alternatives to the Proposed Project is discussed in Section 4.0 of the Draft EIS. The emissions from the airport with the Proposed Project are less than that of the No-Action. The Proposed Project reduces queuing times and increases the efficiency of the air and surface transportation in the airport environs.

As indicated in the air quality study (Appendix F), at the time the analysis was performed, no aircraft emission data for noncriteria pollutants could be located either at the FAA or at EPA. Insofar as we are aware, this continues to be the case, and we are unaware of any air quality study for any other airport either in Hawaii or elsewhere in the U.S. where the issue of noncriteria emissions has been quantitatively addressed. Nevertheless, as shown in Table 19 of the air quality study, emissions of the criteria pollutants in the year 2010 with the

project are estimated to either decrease or remain about the same compared to the without the project alternative. Emissions of the noncriteria pollutants can be expected to follow a similar pattern.

During an elevated temperature inversion, low-level emissions can be trapped beneath, resulting in elevated concentrations at extended distances downwind from an air pollution source. While we are unaware of any data that exist which indicate that elevated inversion conditions exist for prolonged periods of time in the vicinity of Kahului Airport, it is likely that such conditions occur for short periods during the morning and possibly during brief periods when the trade winds are absent and sea breeze conditions prevail. In any case, such conditions would have no effect on the near-source concentration estimates provided in the air quality impact report. Even during periods when elevated inversions exist and cause trapping conditions to occur, maximum offsite concentrations would be lower than the near-source, worst-case values given in the air quality impact report.

PH-32 - No-Action Impacts

RESPONSE: A discussion of the No-Action alternative and the impacts are included in Section 4.0 of the IDraft EIS. The impact analysis uses the same criteria and analysis that was used in analyzing the impacts for the Proposed Project. As the No-Action alternative maintains the existing Airport, it maintains the existing environmental impacts and facility deficiencies. According to the 1993 Kahului Airport Master Plan, the following deficiencies would continue or worsen without implementation of corrective measures:

- The existing weight penalties for the overseas aircraft (DC-10 and L-1011 or larger) currently serving Kahului Airport would continue.
- The current inadequacies regarding air cargo facilities and shipping capacity would worsen within the planning period.
- Shortages of commercial aviation and Fixed Base Operator Lease Lots would worsen.
- Airport access roads will experience increased traffic congestion.
- Airline Ground Equipment Maintenance Facilities would be inadequate.
- Fuel Storage and loading would be inefficient and costly.
- Within the planning period, Kahului Airport would begin experiencing average aircraft delays greater than 4 minutes. This would result in higher operating costs to the airlines and inconvenience for passengers. By the year 2010, the Master Plan, using the Statewide Airport System Plan (SASP) forecasts, predicted an average aircraft delay of 11 minutes. Using the Updated Aviation Forecasts from HDOT-AIR, the average aircraft delay is reduced to 7 minutes in the year 2010 under the No-Action alternative.
- The increase in aircraft delays and ground vehicle traffic congestion would increase environmental impacts such as vehicular noise and air pollution.
- Anticipated increases in aircraft operations may also result in the crowding of airspace above the airfield and a need for additional airfield capacity. This overcrowding condition may consequently reduce the margin of safety at the Airport.

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1 MR. DAVID WELHOUSE: Good evening. It's now
 2 7:07 and I hereby open this public hearing concerning the
 3 Kahului Airport Draft Environmental Impact Statement here in
 4 the Kahului Airport Terminal, Gate 39, on this May 8th, 1996,
 5 in accordance with the notice of public hearing advertised by
 6 the Maui News, the Honolulu Advertiser and the Honolulu Star
 7 Bulletin.
 8 My name is David Welhouse, I'm with the Federal
 9 Aviation Administration, and for all of you people out there
 10 my last name is spelled W-e-l-h-o-u-s-e, one 'l'. I'm the
 11 project manager with the FAA and I've been, basically,
 12 assigned, through our office, to manage this Environmental
 13 Impact Statement.
 14 Okay. Let me give you an example. The purpose of
 15 this public hearing is to provide all of the interested
 16 persons an opportunity to comment and submit testimony,
 17 orally or in writing, with respect to the Draft Environmental
 18 Impact Statement. The preparation of this EIS officially
 19 began with the publishing of a notice of intent in the
 20 federal register on April 7, 1994.
 21 Two scoping meetings were held right here in this
 22 terminal on May 18th, 1994. The scoping meetings helped to
 23 identify the public and the agency concerns, plus identify
 24 the issues and the alternatives to be addressed in the EIS. A

1 draft EIS was then prepared and distributed the first week of
 2 April this year. A federal register notice was published by
 3 the Environmental Protection Agency on April 5, 1996. Public
 4 hearing notices were published in the newspapers on April 7,
 5 1996.
 6 Okay. Following this public hearing and the receipt
 7 of all of the comments, a final Environmental Impact
 8 Statement will be prepared and a record of decision will be
 9 issued by the FAA. Finally, EIS should be available in about
 10 two to three months, if nothing else -- depending upon how
 11 many comments we get.
 12 Our agenda for tonight, what you see here, a copy
 13 -- you should have picked one up -- will be as follows:
 14 First, Ben Schlapak, who is the Planning Engineer with the
 15 State Department of Transportation, Airports Division, will
 16 make a short presentation on the major components of the
 17 proposed project, plus some of the significant impacts and
 18 litigation measures. Then our facilitator, Mr. Keith Hunter,
 19 will explain the guidelines for the public hearing. He is
 20 going to be facilitating tonight. After which we will begin
 21 to receive public testimony on the draft EIS.
 22 Now when people come up to this mic, this is where
 23 they'll be speaking, please don't touch this microphone. It
 24 took me 30 minutes to get it to work today. Thanks.
 25 And now, Mr. Ben Schlapak.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 MR. BEN SCHLAPAK: Good evening, ladies and
 2 gentlemen. Welcome to Kahului Airport, Gate 39. We're
 3 anxiously looking forward to your comments tonight. So my
 4 remarks are going to be very brief and we'll get right into
 5 it. I just want to make a couple of points on things that
 6 have come up since we were here last in the scoping meeting.

7 Steve, could I have the first view graph.
 8 We have the passenger data for 1995, and this curve
 9 is historical data on millions of passengers in and out of
 10 Kahului Airport over these years. This is the inter-island
 11 curve and this is the mainland direct flight and then the
 12 total.

13 In 1994, we looked at our forecast for all of the
 14 airports in Hawaii and revised some of our future forecasts
 15 downward a little bit so that the slope of the curve wasn't
 16 quite so high. But what we see here in 1994 and 1995 at
 17 Kahului is there are more passengers coming then we had
 18 forecasted or projected. It is our business in the Department
 19 of Transportation to keep the capacity of the airports ahead
 20 of demand, particularly for the big five airports in Hawaii,
 21 that's what we're trying to do with this master plan.

22 But in this particular graph, I think you can see
 23 that Kahului is quite a busy airport. In fact, it is the
 24 second busiest airport in Hawaii after Honolulu. This growth
 25 here between 1994 and 1995 is a 4.9 percent increase greater

than the 2.9 percent at Honolulu. The Honolulu to Kahului and
 back city pair is number one in the United States in volume
 for the short routes, under 700 mile route. So there's no
 question that Kahului is a major airport.

The master plan that we're working from looked
 ahead to the year 2010. The latest activity forecast looked
 ahead to the year 2020, partially because of the inter-modal
 legislation forces us to look ahead 25 years with a forecast.
 So the projects that we have in three phases look ahead to
 2010 and really stretch now to 2016.

Could I have this graph? Steve, would you put up
 the graphic?

Now on the right screen, we're showing Kahului
 Airport and in violet we're showing the projects in phase I
 and listing them here on the left screen. So phase I
 contains the lengthening of runway 220, the main runway,
 2,600 feet to the south to 9,600 feet, and strengthening the
 rest of it; a new airport access road with a partial clover
 leaf, a fuel storage facility and an underground line to the
 hydrant system on the aircraft parking ramp out here, an
 interim helicopter facility, and some utilities, particularly
 another sewage line on the east ramp.

In phase II, beyond the year 2003, we're projecting
 new --- generally, the Asian facilities and possibly land
 acquisition, looking forward to a parallel runway way out in

1 the future, which, theoretically, could be necessary but it's
 2 a long way off. It would require a separate Environmental
 3 Impact Statement and it's strictly dotted lines on our
 4 airport layout plan and in our master plan.

5 Could I have the next slide, please?

6 In the first volume of this sizable EIS on page
 7 1-16, we took an attempt at trying to summarize the impacts
 8 and a lot of the significant impacts are way out in the third
 9 phase in the future and will not happen if we don't get into
 10 those projects. I'm not going to belabor these -- there's
 11 another sheet, Dave, please -- because I think many of you
 12 are going to talk about them. But I want you to know that
 13 we're going to deal with these impacts in our development
 14 plan, in our capital improvement plan that puts together
 15 projects and we're refining that this year based on a total
 16 new look at the state system. In some cases, we will have to
 17 do extensive interfacing with other state, county and federal
 18 agencies to minimize impacts and provide mitigation but we
 19 are prepared to do that.

20 Tonight, we look forward to your comments on the
 21 draft EIS and to answering them in the near future and I'll
 22 turn it over to Keith Hunter.

23 MR. KEITH HUNTER: Thank you very much.

24 Welcome, everybody. You're here for a very valuable and
 25 important process and that is to gather public input on this

1 EIS. We have an enormous number of speakers and we have some
 2 guidelines and ground rules that we're asking everybody to
 3 follow tonight so that everybody here has a chance to say
 4 what they need to say in the time that we have allotted for
 5 that purpose.

6 I'm the facilitator. I want everybody to know that
 7 I'm neutral. I don't work for the state or the FAA or any of
 8 the parties involved. I really don't know anything about this
 9 EIS, and that's why I'm here. My job is try to run an
 10 efficient and an effective meeting for everybody.

11 There are three ways for you to submit testimony
 12 tonight. Let me, please, go over them very carefully so that
 13 everybody understands them. The first is to submit public
 14 testimony given at this podium before this court reporter. We
 15 ask that you limit your comments to three minutes so that
 16 others will have an equal opportunity to be heard. We
 17 presently have nearly 60, perhaps 70, people who have already
 18 reserved time to speak. So we could be here a long time.

19 Everyone will be given enough time to present their initial
 20 concerns. However, we have placed a three minute limitation.
 21 If your testimony will extend beyond three minutes, you will
 22 be asked to give additional testimony after everybody else
 23 has had a chance to give their three minutes.

24 I'm going to give the first list of 10 speakers so
 25 that you can be aware of when you're coming up. We're asking

1 that the on deck speaker try to come up and sit in this seat
2 just behind the person who's speaking ahead of them so that
3 we can move up here in an orderly fashion.

4 This hearing is not intended to be a debate or a
5 public referendum. We are here tonight simply to solicit
6 factual testimony from you on this draft EIS. There will not
7 be any responses given to the questions asked tonight. Also,
8 we ask that your testimony speak to the issues of the draft
9 EIS without reference to people or their opinions. Be hard
10 on the problems but soft on the people. Please don't
11 interrupt other speakers. Please no personal attacks.

12 The second option is to provide private testimony
13 to the court reporter in the back of the room. Due to some
14 equipment problems, this is somewhat limited because we only
15 have one court reporting machine and that will have to be
16 done at the close of tonight's meeting.

17 The third option is to give your written comments
18 to Mr. Welhouse, either tonight or any time before May 23rd,
19 1996, which is the close of the comment portion.

20 A couple of other ground rules that we would simply
21 ask that you follow. I'm going to be calling the speakers up
22 from over on this side and at about two and a half minutes
23 into your talk, I will give you a 30 second warning that
24 you're coming up on your three minutes. Please don't view
25 that as rude. We're simply trying to manage the time so that

1 everyone has a chance to talk. Please, speak slowly and
2 clearly. All of your words are being recorded and
3 transcribed and it's important that we have them accurately
4 and clearly. We may need to take a break because this woman
5 is not superwoman and her fingers may get tired and we may
6 need to give her a break. So if we need to do that, I would
7 ask everybody's forbearance in that regard.

8 Again, speak clearly. Speak to the issues. And
9 follow the three B's of public meetings: be bold, be brief,
10 and be seated. Follow those three rules and I think we'll do
11 okay.

12 Let me call the first 10 speakers names, and please
13 be aware of where you follow in this group. Tom Cannon,
14 Celeste King, Isaac Hall, Dana Hall, Brian Huse, Nicole
15 Warthall, Charles Maxwell, Don Reeser, Marsha Wiener and Jim
16 Shefte.

17 Again, I'll be giving you a two and a half minute
18 warning after you get started. So if Mr. Cannon and Ms. King
19 could come up here, we'll go ahead and get started.

20 MR. TOM CANNON: Good evening. I'm Tom
21 Cannon, an architect who was born and raised on Maui.
22 Although I am a child of this land, I didn't fully realize
23 how globally unique the Hawaiian islands are until later in
24 my life after being educated and traveling to other parts of
25 the world. Now I know more fully how special my home island

1 is and how we will lose the qualities of Maui without better
 2 care.

3 The EIS process for projects such as the proposed
 4 airport expansion is suppose to ensure proper care.
 5 Unfortunately, this draft doesn't even come close. And if it
 6 is accepted without significant improvement, we stand to
 7 quickly lose Maui's finest characteristics forever. What will
 8 we pass on to the next generations?

9 The most unique and special attribute of Hawaii and
 10 Maui, which truly sets us a part from the rest of the world,
 11 is our native Hawaiian plant and animal species. They were
 12 here long before we humans, and, over hundreds of thousands
 13 of years evolved into an exceptionally gentle environment.

14 This native Hawaiian environment, or Aina, is Hawaii's
 15 heritage and the best asset we have to ensure long term
 16 economic benefit for ourselves and future generations.

17 Hawaiian species have a high potential to benefit
 18 humanity by providing medicine and the unique gene pool to
 19 modify other species. Hawaiian cotton has already been used
 20 to genetically alter American cotton. The Hawaiian plant
 21 Olanau (phonetic) provides an exceptionally strong natural
 22 fiber for rope. The potential to benefit humanity and the
 23 economic potential of Hawaiian native species has barely been
 24 tapped and yet many species are being lost to extinction
 25 without ever being put on an endangered species list.

1 By far the most serious threat to these species,
 2 Hawaii's most precious asset, is the introduction of
 3 aggressive non Hawaiian species. When Hawaii was a U.S.
 4 territory instead of a state, no one was allowed to come here
 5 from the U.S. mainland or internationally without first
 6 having his baggage inspected and being interviewed as to what
 7 organic material he may be carrying. This is still done in
 8 every major Pacific Island nation today. In every one,
 9 without exception, this inspection process is considered a
 10 basic level of precaution. Now, in Hawaii, we rely on an
 11 honor system. If you're sneaking in your Boa constrictor or
 12 Jackson Chameleon into Hawaii, you're expected to turn
 13 yourself in at the airport.

14 Obviously, or not surprisingly, this method is not
 15 working. We read about Piranha found -- pardon me?
 16 MR. HUNTER: Thirty seconds.

17 MR. TOM CANNON: We read about Piranha found
 18 in the reservoir in Oahu, about the Iguana found in Eau
 19 stream, about the miconia we taxpayers are paying thousands
 20 to eradicate in Hana.

21 The previous EIS of this proposed airport expansion
 22 noted that between 50 and 75 percent of all unwanted foreign
 23 species arrive in Hawaii via airplanes and that these species
 24 pests would be more likely to arrive via airplane to Maui
 25 than to Oahu, in that our airport is surrounded by vegetation

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1 visitors because of the language barrier, because we're
 2 talking about bringing visitors in from foreign countries.
 3 And the likelihood, according to our social studies, of
 4 residents feeling that they must provide a self-protected
 5 retreat for themselves when they are threatened by not being
 6 able to communicate with all of these people who are coming
 7 into their home island, causes them to stay within their
 8 homes with feelings of loss of freedom of movement and this
 9 develops anger among local residents over this loss.

10 Also, more visitors opens up opportunity for
 11 investors, more hotels built, particularly in Napili and
 12 further west areas, and the loss of the life style of the
 13 native population presently living there, as well the lack of
 14 water to grow taro, as that's used in the visitor industry.

15 And, finally, what concerns me greatly is that
 16 we're developing an addiction of greed here. And when
 17 children are growing in an environment where things are more
 18 important than people, they tend to become greedy themselves
 19 and they don't treat people very well because things are more
 20 important and they have a lowered appreciation of the natural
 21 beauty and the happiness which comes from close relationships
 22 with people. So I ask you, please, to revise this statement
 23 to include the social impact. Thank you very much.

24 (Audience applauding)

25 MR. ISMAC HALL: This draft EIS is totally

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1 inadequate. Large amounts of public money have been wasted
 2 to advocate DOT's position. This DEIS should be withdrawn and
 3 the EIS to which our community is entitled should finally be
 4 prepared.

5 After the last EIS was rejected, I sincerely hoped
 6 that our federal and state governments would take this latest
 7 opportunity to acknowledge the severe adverse impacts that
 8 airports create and to fashion a comprehensive mitigation
 9 program to protect our residents, our parks, our farms, our
 10 endangered species, our air, our water from these impacts. No
 11 such plan is included. Only if such a mitigation program is
 12 fashioned is there any possibility of community acceptance of
 13 this airport expansion project.

14 It is really beyond dispute now that airports are
 15 economic engines which induce growth. Was Governor Cayetano
 16 way off base when he stated with certainty that three
 17 international flights per week to Kona, with the recently
 18 extended runway, will bring 48,000 new tourists per year, 183
 19 million new dollars per year to the Big Island, and 364
 20 million new dollars per year to the state?

21 It is also beyond dispute that airports are
 22 gigantic polluters. Airport operations cause, obviously,
 23 significant adverse impacts, excessive noise pollution, air
 24 pollution, water pollution, to name a few. We're really going
 25 backwards. This DEIS is worse than the last one. Its five

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1 volume flood of words is repetitious, obscure and too often
 2 intentionally misleading. The new authors have spent the last
 3 two and a half years trying to hide issues, rather than study
 4 them.

5 All of the projects are proposed because they're
 6 supposedly necessary to accommodate the forecast demand. How
 7 this demand was forecasted is a critical issue. There was a
 8 new document prepared in October 1994 to address this new
 9 demand but we can't see that document. We've got to make an
 10 appointment with Mr. Schlapak and go to Honolulu to do that.
 11 That document should have been attached to the draft EIS and
 12 it should immediately be made available to all of us
 13 commentators before the comment period ends so we can use that
 14 in commenting.

15 Is DOT really willing to warrant -- is DOT willing
 16 to warrant that there will be no international flights to
 17 Maui before the year 2010, as the DEIS implies? I doubt it.
 18 If Maui is not going have any international flights until the
 19 year 2010, why did Governor Cayetano represent in his most
 20 recent state of the state address that he wanted to establish
 21 an international airport on Maui now? Why is Governor
 22 Cayetano negotiating with two new airlines to bring
 23 international flights to Maui? Why was every reasonable
 24 alternative runway length less than 9,600 feet long
 25 automatically rejected in the DEIS because it would not allow

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1 for direct non-stop flights to potential future international
 2 destinations.

3 International flights have to be discussed now and
 4 they should have been discussed in the EIS. I'm going to go
 5 really quickly. Noise impacts weren't addressed adequately,
 6 and I'll just summarize it. That DOT assumed that there would
 7 be all stage three aircrafts in the year 2010. That's an
 8 absurd proposition. That's been fought all the way down the
 9 line. Aloha refuses to convert to stage three aircraft,
 10 Hawaiian refuses to convert to stage three aircraft. The
 11 noise study is inadequate because it assumes that they're
 12 going to be stage three aircraft in the year -- all stage
 13 three aircraft in the year 2010.

14 Finally, to wrap it up, the discussion of the
 15 parallel runway and the reliever airport is totally
 16 inadequate. We have a capacity problem. This airport is
 17 going to reach a capacity very soon and we're either going to
 18 have to have a new parallel runway or we're going to have to
 19 have a reliever airport. There's no discussion in the EIS
 20 about the costs and benefits, environmentally and otherwise,
 21 of a parallel runway versus a reliever airport.

22 I'll leave it at that but I think this EIS ought to
 23 be withdrawn. It's obviously inadequate. Our community
 24 deserved a lot more and a new EIS ought to be rewritten and
 25 there should be a new comment period. Thank you.

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(Audience applauding)

MS. DANA HALL: Dana Maone Hall. Last week,

the heading of a lead article in the Maui News declared airport funds misused again. Apparently, U.S. Department of Transportation attorneys are questioning whether the Office of Hawaiian Affairs is entitled to receive a portion of airport revenues as a partial payment for the use of ceded lands.

Governor Cayetano, who was locked in battle with OHA over the ceded lands revenue issue, has been happy to join in the federal course. While the Governor eagerly attempts to reduce OHA's revenue, since his administration squanders airport and taxpayer funds on a five volume draft EIS, it should have been printed with a label on its spine that states "Warning: reading this EIS may injure your health".

The 1992 state EIS cost in the neighborhood of a half million dollars. The current EIS will clearly cost -- exceed that figure. The airport boundary encompasses approximately 1,447 acres. No other major airport in the state system can boast of being a neighbor to such important and valuable resources as are found at Kahului. Within a small radius lies the sands of Kanaha Beach Park and the buried remains of Maui's pre-history. As well as Kanaha Wildlife Sanctuary, which comprises nearly 16 percent of the

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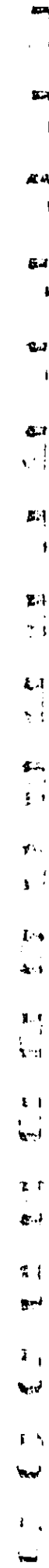
land within the airport boundary where the alai kea can be found nesting among the maka loa.

In spite of these special qualities, the subcontractor hired to help produce the social economic assessment for the EIS characterized DOT's forecast figures for Kahului Airport excessive, although in the consultant's opinion not unreasonable. Four point seventy-four million passengers filtered through the airport in 1992, and almost 8 million are expected in 2010. The impact analysis admits that actual impacts are virtually "unknowable", this is a quote, "at this point in time. Although there is a greater potential of growth inducing impacts from introduction of international non-stop flights than from domestic flights", unquote. The EIS avoids addressing the impacts of international flights by claiming that permanent federal inspection facilities are not planned until the end of planning horizon when 511,000 international passengers are predicted. DOT's position is hardly credible given the desperate pleading we recently witnessed on the part of our governor and others regarding the start up of JAL flights to Kona, which are scheduled to begin in June.

Earlier this month in the flush of these assurances the governor revealed that two foreign air carriers are interested in flying to Maui and the Big Island but that he was not at liberty to disclose their identities. It is

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1 interesting to note that the DOT's aviation demand forecast
 2 shows that the number of military flights will more than
 3 double, increasing nearly 120 percent from 1992 to the year
 4 2000, and remain relatively stable thereafter to 2010.

5 These figures give rise to some troubling
 6 questions, which the EIS fails to answer. Air carrier and
 7 commuter air taxi are the most numerous operations at the
 8 airport are predicted to increase operations by approximately
 9 35 percent between 1992 and 2010. While military operations
 10 are forecasted to increase by a phenomenal 120 percent. Where
 11 would the military flights be coming from and why the sudden
 12 predicted upsurge in these flights? Most importantly, why
 13 does the EIS fail to address the impact of this increase in
 14 flights, especially when these flights may originate in
 15 international airports.

16 We are all aware that the brown tree snake is known
 17 to have hitched a ride to Honolulu aboard military planes on
 18 more than one occasion in the past few years. I spoke with
 19 the U.S. Department of Agriculture's chief inspector at
 20 Kahului Airport today and he informed me that military
 21 flights from Guam and Pango Pango land at Kahului from time
 22 to time and are inspected by U.S.D.A. personnel. The
 23 inspection of crew, passengers and cargo is verbal and visual
 24 and if live insects are found the plane is treated with an
 25 aerial application of insecticide.

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1 Of course, if a brown tree snake drops out of the
 2 landing gear as the plane approaches over the cane fields,
 3 the insecticide won't do a thing. The U.S.D.A. inspector also
 4 informed me that military flights can arrive at odd hours.
 5 Although, this is not a frequent occurrence, military flights
 6 have landed in Kahului between 2:00 and 4:00 a.m.

7 I'm about concluded. I can't speak without the
 8 squeak. Actual aircraft operations in 1992 were 178,752 and
 9 in 1994 this number has increased by only 475. The
 10 inconsequential increase does not support what may be
 11 purposely inflated forecast figures of the EIS. If these
 12 forecast figures are too large, then the tremendous cost of
 13 DOT's preferred plan amounted to nearly one-third of a
 14 billion dollars, 315.3 million, cannot be justified.

15 After a lawsuit filed in 1989 and two court orders
 16 later, we did not get a clearer or braver EIS with a serious,
 17 comprehensive and comprehensible analysis for the potential
 18 impacts of DOT's proposed expansion plans. But a seemingly
 19 impenetrable document written to obscure issues and designed
 20 to put off, rather than invite, public understanding and
 21 involvement.

22 Nevertheless, I would like to end on a positive
 23 note. Here is a copy of an article that appeared in the Maui
 24 News in 1986, ten years ago. In commemoration of this 10th
 25 anniversary, I brought a cake to share with DOT, the FAA and

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1 everyone who is present.
 2 (Audience applauding)
 3 MS. DANA HALL: I hope DOT and the FAA finally
 4 get the message, this may be the only way to have your cake.
 5 (Audience applauding)
 6 MR. BRIAN HUSE: Thank you. My name is Brian
 7 Huse. I am the Pacific Region Director for the National
 8 Parks and Conservation Association. NPCA is a citizens
 9 organization dedicated solely to protecting, preserving and
 10 enhancing our national parks system. With over 450 members
 11 nationwide, NPCA combines national advocacy with Grassman
 12 activism to respond quickly and effectively to the ever
 13 increasing threats to our national parks.
 14 The proposed airport expansion will provide an open
 15 gateway for alien species to exploit Haleakala's native
 16 ecosystem. Despite the possible devastation of Maui's unique
 17 and fragile environment, the Hawaii Department of
 18 Transportation and the Federal Aviation Administration have
 19 virtually ignored the potential impact of alien species on
 20 Maui's natural environment.
 21 After nearly 6 years of planning, including two
 22 environmental review documents, these agencies have
 23 systematically avoided addressing the issue of alien species
 24 invasion, going so far as to affirmatively exclude the
 25 national park service from participation as a cooperating

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1 agency in the environment review process.
 2 The actual parks, such as Haleakala, are set aside
 3 by Congress as areas meriting the utmost protection and
 4 preservation in order to conserve their natural and historic
 5 resources for future generations. For many years, the
 6 physical isolation of parks was their greatest defense
 7 against external pressures on park resources. However, as
 8 natural habitat and open space falls to expanding human
 9 population, our national parks role as biological sanctuaries
 10 becomes even more critical.
 11 Today, incompatible land uses are the primary
 12 threat to the national parks system and their ability to
 13 preserve park values and to prevent the destruction of wild
 14 life and other natural resources.
 15 The proposed expansion of Kahului Airport is but
 16 one of many projects throughout the United States that
 17 threaten the natural integrity and cultural significance of
 18 our national parks system. In California, it would be the
 19 world's largest proposed solid waste land fill, slated to
 20 process over 20,000 tons of trash each day for the next 100
 21 years is located in the heart of unique desert habitat along
 22 the border of Joshua Tree National Park.
 23 Similarly, Yellowstone National Park is threatened
 24 by a proposed Moranda Gold Mine (phonetic). The proposed
 25 mine, located just three miles upriver from the heart of

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1 Yellowstone, will produce 5.5 million tons of toxic waste to
 2 be stored along the banks of pristine rivers leading into the
 3 park. Decades of excessive water consumption, pollution, and
 4 the draining of farm land adjacent to Everglades National
 5 Park has devastated this famous subtropical wetland.
 6 Combined, these and other similar projects,
 7 threaten to dismantle our nations most pristine and valued
 8 natural places. Preservation of Haleakala Park should not be
 9 sacrificed for the FAA's airport project. Unlike a private
 10 owner who seeks to develop privately owned land, here the FAA
 11 proposes to expand a public airport on public lands. And
 12 while the rights of private land owners sometimes take
 13 precedent over the protection of our national parks,
 14 federally funded development on public land does not.
 15 The request of the National Parks Service to
 16 participate in the environmental review process should not be
 17 ignored. As federal agencies seeking to review a federally
 18 funded project, the FAA and the NPS owe a duty to the public
 19 and to Congress to preserve our national parks unimpaired for
 20 future generations. Thank you.

21 (Audience applauding)
 22 MS. NICOLE WARTHALL: My name is Nicole
 23 Warthall. I'm an attorney representing the National Parks
 24 and Conservation Association. We have a number of concerns
 25 about the potential environmental impacts associated with the

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1 proposed airport expansion. A particular concern, from our
 2 perspective, are the --
 3 (Audience interrupting "louder, we can't hear")
 4 MS. NICOLE WARTHALL: A particular concern,
 5 from our perspective, are the impacts on Haleakala National
 6 Park from the introductions of alien species. The failure to
 7 fully analyze these potential impacts in the draft EIS is a
 8 clear violation of the National Environmental Policy Act.
 9 NEPA expressly requires that an EIS evaluate all
 10 environmental consequences of a proposed action. These
 11 include effects which occur at the same time and place as
 12 well as all reasonably foreseeable future effects.
 13 Impact on natural ecosystems are expressly defined
 14 as effects under NEPA. Furthermore, NEPA requires that an
 15 agency disclose and discuss all mitigation measures, which
 16 may avoid, minimize or reduce the adverse impacts of a
 17 proposed project. These, and other sections of NEPA, clearly
 18 call for a full evaluation of the potential effects of alien
 19 species introduction to Maui's environment resulting from the
 20 expansion of Kahului Airport.

21 But in an attempt to avoid the issue of alien
 22 species introduction, the draft EIS asserts that this issue
 23 is an existing statewide problem and that other federal and
 24 state agencies have already studied the issue and it denies
 25 that overseas flights will immediately increase. But none of

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1 these claims limit the requirement under NEPA that a draft
 2 EIS fully evaluate all foreseeable impacts of the project.

3 It's undeniable the non-native species introduction
 4 is a foreseeable consequence of this proposed project. The
 5 draft EIS itself demonstrates that the proposed project is
 6 aimed at allowing economically viable direct international
 7 flights into Kahului Airport. For example, the project
 8 description explains "By providing additional runway length
 9 and a strengthened runway, the proposed project will permit
 10 an airport to better accommodate future international hubs".

11 And later in the draft EIS, it states, quote, "One
 12 of the main objectives of the proposed project is to develop
 13 in phase I of the master plan an air field which would allow
 14 for long haul aircraft operations". The alternative analysis
 15 in the draft EIS also confirms that non-stop international
 16 flights are a foreseeable consequence of the proposed
 17 project. For example, the no project alternative is rejected
 18 for its failure to alleviate the existing waste penalties for
 19 overseas aircraft. And in rejecting alternative two, the
 20 draft EIS says its principal deficiency is that the 8,500
 21 foot runway length is not long enough to provide for direct
 22 non-stop flights to all visitor markets, including future
 23 international destinations.

24 Moreover, the draft EIS specifically estimates that
 25 international flights will bring in 6.4 percent of the total

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1 number of passengers by the year 2010. Thus, the proposed
 2 project will produce an airport capable of accommodating
 3 international flights but it fails to analyze the impacts
 4 associated with such an expansion.

5 The draft EIS further acknowledges that
 6 introduction of alien species by direct overseas flights is a
 7 major concern, especially considering Maui's sensitive
 8 environment. According to the draft EIS, the protection of
 9 Maui's environment against alien pests hinges on measures of
 10 control taken by state and federal agricultural inspection
 11 services. Yet, none of these measures are discussed or
 12 analyzed.

13 The document admits that Kahului Airport must have
 14 modern inspection facilities with stringent operation
 15 standards to protect Maui's environment. But it offers no
 16 analysis of the location, design or funding of such
 17 facilities. These measures necessary to alleviate the threat
 18 of alien species invasion must be fully analyzed and explored
 19 in the draft EIS. Without full evaluation of these impacts,
 20 including the impacts on Haleakala National Park, as well as
 21 the discussion of all feasible mitigation measures, the draft
 22 EIS does not meet the legal requirements of NEPA. Thank you.
 23 (Audience applauding)

24 MR. CHARLES MAXWELL: You know, before I
 25 begin, I would like to tell you that it's very difficult

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1 walking. I was disabled as a police officer and walking all
 2 of this distance, I think somebody is in violation of the
 3 Disability Act or, you know, some law of being stupid.
 4 Because, let me tell you something, I mean this is
 5 ridiculous. Somebody has got to get me a wheelchair to go
 6 back. I need one and I'm informing you now.
 7 I hope and pray, I hope and pray, that my Hawaiian
 8 Gods make this into a luxury storeroom or a place that we,
 9 Hawaiians, can have our protests here in a nice building like
 10 this but never a terminal.

11 I was born in Nepili, Maui and I've lived all of my
 12 life here and have seen the changes that occurred over the
 13 years. I can remember the population of Maui to be about
 14 30,000 plus, until it became a state and all hell broke
 15 loose. We are presently over 100,000 people and there are
 16 many of us who miss the Maui we once had. Already our
 17 highways are over burdened with cars and during the morning
 18 and evening peak traffic periods, many places are gridlocked.
 19 From Hana to Lahaina, no one is safe from this modern
 20 phenomenon.

21 The Environmental Impact Statement fails to
 22 adequately address the traffic problem outside of the airport
 23 proper. Even a lay person, like myself, realizes that traffic
 24 created by the expansion effects the entire island because
 25 cars will not be driven in a circle round the airport.

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1 Another problem the EIS statement fails to address is the
 2 fact that by lengthening the runway, internationalization
 3 will occur and this might be the most important reason why
 4 this should not happen.

5 Maui has very rare endangered fauna and flora.
 6 Other people who are testifying today will speak on these
 7 endangered species. The Kahului Airport is surrounded by
 8 prime agriculture lands and a very large wetland on the mauka
 9 side of the airport. Unlike the reef runway, which is all
 10 paved, and Kona Airport which is surrounded by lava, Kahului
 11 is unique. Anything that drops from the airplane's landing
 12 gear or hitchhikes in cargo will be able to establish itself
 13 here before its even detected and that will be too late.

14 Another factor which has not been analyzed is a
 15 study of what effect it has -- the extension has to the
 16 Kanakamaoli of Maui. Every time something is built on Maui,
 17 from hotels, to condos, to golf courses, to runway
 18 extensions, the native people suffer. By allowing the runway
 19 to be extended, more people are brought in, more
 20 infrastructure have to be built, more luxury houses are built
 21 to meet the demand and, guess what? Some native Hawaiian get
 22 to construct the runway and its facilities and employed at
 23 menial jobs that is created by these new businesses. However,
 24 the large landowners and out-of-state foreign investors are
 25 the ones who will prosper by this expansion. The Kanakamaoli

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1 will lose out with encroachment of their lifestyle, further
2 displacement from their land and the disregard of their
3 spiritual and cultural values.

4 The fact of the matter is that Maui has an appeal
5 but we are slowly losing it. Already with all of the
6 convenient stores and mainland looking shopping centers, we
7 look like Southern California, something you can't tell if
8 you're in Hawaii, because there is hardly a visible sign of
9 authentic Hawaiian culture.

10 If the expansion is allowed to take place then this
11 fact alone will be the straw that breaks the proverbial
12 camel's back. Our Mayor and the hotel and construction
13 industries are pushing for expansion of the runway for short
14 term economic gains. But the innocent ones, the future
15 generation, will feel the wrath of what we create today.
16 They are the ones that have to live with our mistakes and
17 this will be the biggest mistake in the history of Maui.

(Audience applauding)

18
19 MR. DON REESER: Captain Don Reeser here,
20 Superintendent of Haleakala National Park. I'm speaking for
21 the National Park Service, the U.S. Department of the
22 Interior. The Hawaii Department of Transportation, Federal
23 Aviation Administration, 1996 Draft Environmental Impact
24 Statement failed to address the impacts airport runway
25 extension and internationalization will have on Haleakala

National Park's Resources.

1 At the May 1994 scoping meeting, the National Park
2 Service recommended that the following topics be fully
3 addressed in the federal EIS:

4 1. Kahului Airport area environment and its
5 conduciveness for the survival of introduced alien species
6 arriving aboard aircraft from foreign countries.

7 2. Special quarantine and inspection preventative
8 measures necessary to decrease the likelihood of accidental
9 alien introductions contained in baggage and carried by
10 passengers.

11 3. Monitoring measures necessary for early
12 detection of introduced alien species.

13 4. Contingency action plans for locating and
14 eradicating serious pests, such as the brown tree snake
15 should a nucleus population be established.

16 5. Speculation the assessment of the impacts alien
17 species arriving from foreign countries might have on native
18 Hawaiian plants and animals in Haleakala National Park with
19 special emphasis on endangered species.

20 Now the DOT and FAA has chosen to ignore these
21 topics. Virtually no attempt was made to assess the potential
22 impacts to unique native Hawaiian ecosystems of Maui. The
23 National Park Service requested cooperating federal agency
24 status to assist with this assessment but was denied the
25

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1 opportunity to participate. The National Park Service intends
2 to refer this matter to the Council of Environmental Quality.

3 Before the final EIS is prepared, we strongly
4 recommend that professional scientists and managers engaged
5 in native Hawaiian ecosystem preservation be consulted on the
6 potential impacts of the project on native ecosystems
7 island-wide.

8 I have attached further comments and also we have
9 an attached review that we requested by Dr. Lloyd Loope with
10 the National Biological Service. Thank you.

11 (Audience applauding)

12 MS. MARSHA WIENERT: My name is Marsha Wienert
13 and I am the Executive Director of the Maui Visitors Bureau,
14 which represents approximately 350 businesses here on the
15 island. We support the DEIS and the Kahului Airport
16 improvements. My comments will be brief and they will
17 address only issues in the EIS.

18 These improvements would create an airport
19 infrastructure which would support the present and future
20 goals of the county and the state and would allow the Kahului
21 Airport to provide safe -- I repeat -- safe, efficient,
22 economical and convenient air transportation facilities for
23 passengers and air cargo service to Maui's residents and
24 visitors and accommodate existing and forecasted demands.
25 Tourism has been and is expected to remain the major economic

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Industry for Maui County.

2 As the marketing arm for Maui's visitor industry,
3 we support the proposed infrastructure project because it
4 will better accommodate air carriers which currently service
5 -- currently service -- Maui from the West Coast and will
6 allow for direct service east of the Rockies. Airport
7 infrastructure improvements do not, in and of themselves,
8 cause more visitors to come to any destination. Improvements,
9 like those proposed, help facility travel for those who come
10 anyway and will allow the airport to operate more efficiently
11 and safely.

12 Therefore, we concur with the findings of the draft
13 EIS that the proposed improvement will have little or no
14 impact on short or long-term growth levels and visitors to
15 our island. The "if you build it, they will come", mentality
16 has no bearing on this proposed project. They are coming
17 anyway.

18 Beginning next month, we expect to have an
19 additional 16 overseas flights flying in here into Kahului
20 Airport per week. These also include international flights
21 and they're non stop, totaling 86 flights per week of
22 overseas air service to Maui. What this infrastructural
23 improvement will allow us to do is to open up new markets
24 east of the Rockies where we see our future growth coming
25 from, since we are continuing to see fewer and fewer visitors

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1 coming from our base markets on the West Coast.
 2 In addition, the proposed project will generate
 3 short-term employment growth in the construction industry,
 4 which is surely needed. In conclusion, we support DEIS in its
 5 findings. Thank you.

6 (Audience applauding)
 7 MR. JIM SHEPTE: Good evening. I am a chairman
 8 of the Maui Hotel Association and a manager of a small
 9 boutique resort located in Napili. Our association represents
 10 30 properties, 125 businesses and approximately 10,000
 11 employees on the island of Maui. We support EIS in the
 12 proposed Kahului Airport improvements. We support the
 13 proposed improvements because we feel it will provide us with
 14 the opportunity to compete in the U.S. and global markets
 15 that a limited runway will make it difficult to sell right
 16 now and well into the future.

17 We believe the draft EIS to be in sync with the
 18 1991 state tourism functional plan and two of the main themes
 19 in that plan are, one, plan for the future and, two, keep us
 20 competitive. Maui visitor numbers are stagnant. The tax
 21 revenues are down and so are real property values. Those
 22 revenues will not pick up unless the industry picks up. The
 23 industry can't pick up without the infrastructure. Catch 22,
 24 can't solve one without the other.
 25 Unfortunately, situations alluded to during the

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1 first go around with EIS have become a reality. The
 2 recession, loss of jobs, the closure of properties and
 3 businesses who couldn't make it, the growth of competition
 4 and a tremendous loss of revenues have hurt Maui
 5 considerably. An increase in visitor numbers will fill our
 6 properties, which will keep us employed and add to our
 7 lifestyle. Spending habits of the visitors will have a
 8 trickle down effect on the economy, thereby making it
 9 stronger for taxes and increase in property values and, thus,
 10 produce the ability to make the necessary infrastructure
 11 improvements.

12 It is my understanding that the EIS is meant to
 13 acknowledge the impacts that a project has on the community
 14 but not to mitigate the issues. We believe that this EIS has
 15 addressed those impacts and that is it now time for the
 16 community to come together to put into place the guides by
 17 which we will use this infrastructure. Thank you for the
 18 opportunity to comment.

(Audience applauding)

19 MS. LISA HAMILTON: Alien species also
 20 includes disease, human disease. Diseases of the tropics are
 21 particularly concerning. The Visitor Bureau has recently
 22 hired a Bangkok firm to sell Hawaii to the millions of
 23 potential tourists in Asia. These are areas where there is a
 24 great deal of drug resistant tuberculosis, Dengue fever,
 25

See Response #11

1 Malaria and other major disease problems.

2 I don't think the EIS discussed the -- there was
3 adequately discussed, in fact, I didn't see any discussion of
4 this issue at all. Hawaii has experienced tremendous human
5 suffering from the introduced diseases in the past and lacked
6 the medical ability to deal with it before. Could it happen
7 again? This needs to be evaluated so the risk of this
8 problem can be determined. Thank you.

9 (Audience applauding)

10 MR. DAVE CHENOWETH: Good evening. My name is
11 Dave Chenoweth and I live on Maui. With considerable effort,
12 I have reviewed the joint draft EIS and find that the
13 negative impact and mitigation of noise, fumes and the
14 increased risk for the introduction of alien species has not
15 been adequately addressed.

16 I find the traffic projections terrifying. As a
17 matter of fact, I'm not so sure they fit our modern
18 constrained plans of -- currently our community plans and
19 general plan. I believe that the growth proposals in the
20 draft can have a very negative effect on our culture, our
21 resident and visitor satisfaction, our economy, and our
22 future jobs.

23 Our beaches aren't growing. Look at the advertising
24 that is produced to attract visitors. We know the pitch;
25 uncrowded beach, waterfalls, pastoral lands, gentle people.

See Response #1-2

1 What our visitors want is what we want; a beautiful and
2 peaceful island. Look at the political distortions, usually
3 from large landholder pressures, that have been applied to
4 our general plan and to our community plan citizen
5 recommendations. Look at Los Angeles.

6 I ask you to please leave the runways on this
7 wonderful island alone. Thank you.

8 (Audience applauding)

9 MS. CYNTHIA HERBERG: Good evening. My name
10 is Cynthia Herberg. I'm the executive director of the
11 Kaanapali Beach Resort Association, which basically serves as
12 the marketing arm and promotions arm for the 10 Kaanapali
13 Resort Hotels and Condominiums, as well as the golf courses
14 and all of the attractions in Kaanapali.

15 Right now we have over 5,000 Maui residents that
16 work in Kaanapali Resort. I'm here this evening on behalf of
17 the Association to show support for the draft EIS for the
18 Kahului Airport improvements. There's no doubt that tourism
19 is the basis of our island economy and provides the means for
20 many of us to work and live here in Maui. We need to pursue
21 responsible ways in which to support and grow this vital
22 element to our economy.

23 The proposed improvements meet this requirement.
24 Our bread and butter markets, specifically California and the
25 west coast, are not growing. And, in fact, they continue to

See Response #1-2

1 decline. Our office answers calls from these folks every day
 2 and I have the numbers to back that up. We cannot count on
 3 these markets to continue to bring people to our island home.
 4 As responsible marketers, we need to look to expansion in new
 5 markets to fuel our economy. Mainly the areas east of the
 6 Rockies.
 7 I just returned from a marketing trip from both
 8 California and from the Denver area. The response in the
 9 Denver area was phenomenal. California luke warm at best.
 10 What we need to do is to look to these markets and make
 11 transportation affordable. Right now they have to pay touch
 12 down in Honolulu and Maui to come here. That does not allow
 13 for affordable transition from those east coast markets.
 14 The proposed Kahului Airport expansion is needed by
 15 all of us. We urge you to go forward with the proposed
 16 infrastructure improvement to the Kahului Airport. Thank
 17 you.
 18 (Audience applauding)

19 MR. JEFFREY PARKER: Good morning. My name is
 20 Jeffrey Parker. I'm a farmer, owner of the Tropic Orchid
 21 Farm, Maui's largest orchid export company. I have a lot of
 22 hope for diversified agriculture in Hawaii. Hawaii's
 23 agricultural industry grosses nearly one billion dollars per
 24 year, the third largest revenue source in the state and
 25 diverse agriculture is the fastest growing sector of the

1 states economy.
 2 Hawaii's high islands and location in the tropics
 3 allows the cultivation of almost any tropical or temperate
 4 crop. The possibilities for innovative diversified
 5 agriculture are nearly limitless. However, this advantage is
 6 rapidly disappearing because of the alien species invasion of
 7 Hawaii. I'm extremely disappointed in the failure of the EIS
 8 consultants to take the alien species invasion seriously and
 9 their intentional attempt to explain away this serious
 10 problem. They do this by building a case that the
 11 improvements being proposed have nothing to do with
 12 internationalization of the airport. One only has to look at
 13 the events of the last few weeks concerning Japan Airline
 14 direct flights into Kailua-Kona to see that Kahului will be
 15 internationalized immediately, as soon as the runway is long
 16 enough. DOT knows this, the consultants know this, Cayetano
 17 knows this, everyone knows this. It will be international
 18 immediately.
 19 The second basic misassumption is that the impacts
 20 on alien species introductions caused by the proposed project
 21 are insignificant, even though the largest body of scientists
 22 and biologists working on Maui at Haleakala National Park
 23 have grave concerns that the airport expansion will indeed
 24 impact native flora and fauna. Instead of consulting with the
 25 experts at Haleakala National Park, DOT chooses to consult

1 with the uninformed and self-interested Puao Coalition, which
2 it lists as a consulted organization.

3 The EIS document seems to rely heavily on the alien
4 species action plan which shifts responsibility for the
5 problem to agencies other than DOT. Yet, the ACEPT (phonetic)
6 plan itself confirms that the alien pest problem is growing
7 rapidly and that existing programs for prevention and control
8 will fail to protect Hawaii without significant improvements.
9 The EIS does not call for significant improvements.

10 Therefore, it would seem that DOT is actually in conflict
11 with the ACEPT (phonetic) plan.

12 The recent massive budget cuts to the Department of
13 Agriculture combined with the hospitable environment
14 surrounding Kahului Airport make it far more likely that an
15 alien species could escape detection here than at urban
16 Honolulu Airport. It makes a lot of sense to put our limited
17 resources to the best use by concentrating all foreign
18 arrivals at Honolulu International Airport, rather than
19 spreading our remaining resources too thin by pushing for
20 foreign arrivals at all of the outer islands.

21 I question the state government's sincerity about
22 dealing with the alien species problem. Just yesterday there
23 was a news report that Governor Cayetano is discontinuing
24 funding of the Pacific Basin Development Council. One of the
25 councils main goals is to prevent the spread of the brown

1 tree snake throughout the Pacific basin. And just last week
2 as a certified nursery operator I received this letter from
3 the Department of Agriculture. Because of the threat from a
4 new citrus aphid in Hawaii, Arizona has placed a quarantine
5 ban on all Hawaii nursery products. Besides the financial
6 impact of losing Arizona as a customer of mine, we are afraid
7 that this ban could be extended to neighboring California.
8 Maui farmers need to understand that any new
9 serious pests introduced to Hawaii could cause other states
10 to place quarantine bans on our agricultural exports, thus,
11 potentially destroying the promising diversified ag industry.
12 What farmers like myself want is that before expansion of
13 Kahului Airport can even be considered, the number of alien
14 species introduction statewide must be lowered dramatically
15 to approach the results obtained by the governor of New
16 Zealand where the number of alien species introductions is
17 only a fraction of those here in Hawaii.

18 I find it amusing that just this week there are
19 some accusations being made concerning improper awarding of
20 the lucrative contracts by DOT. It's time for the common
21 person on Maui to realize that this project is not about
22 helping residents, but rather is about enriching the rich and
23 diminishing the quality of life for the average person. Stand
24 up, get vocal and help those of us who will challenge this
25 EIS in a new lawsuit. Thank you.

See Response #17

(Audience applauding)

MS. AUDREY GARCIA: Aloha! My name is Audrey Garcia. I'm a life-time resident of Maui, a counselor and school teacher and am an owner of a Maui products business for 15 years here on Maui.

First of all, I'd like to point out that the social impacts that Dr. Celeste King describes, describes life on Oahu to a "T". And I'd like to ask, how many of you in this room would chose to live on Oahu over Maui? I'd like to see a show of hands. Anybody in the room would chose to live on Oahu?

Okay. We've got two people in this room that would chose to live on Oahu. I just wanted to point that out.

Secondly, I've been in business here on Maui for about 15 years working with the visitor industry on a one to one basis, very often on a daily basis. And visitors have told me over and over and over again that what they enjoy about coming to Maui is the adventure of getting here, like being a kid and getting ready to go somewhere really exciting and packing your bags and knowing that it's, you know, going to grandma's house. You're not necessarily going to get there really quick, it's going to take some time.

Many of the old time visitors are saying that they now chose to go to Lanai or Kauai for the major part of their stay and maybe will spend a few days here on Maui. Also, I do

See Response #1-2

a lot of promotions and shows at a very Hawaiian hotel. I won't mention the name because I don't feel at that point it's fair to say that. But what they do is they promote the Hawaiian culture, the Hawaiian language. And as of about a year and a half ago, after the slump, the hotel has been busting at the seams, basically. They have turned people away during the busy season. And luckily, for me, my business has gone back to where it was in '89 before the economy took a dive. So I think there's a reason to believe that if you're marketing the right product, that people will want what you have.

And, thirdly, I'd just like to ask, again with a show of hands, it's kind of my school teacher background, how many of you in this room would like to see and touch a dinosaur? I would. Okay. We're losing a lot. Thank you.

(Audience applauding)

MS. KAREN ARDOIN: I strongly support revising the EIS to better evaluate the risks of alien species introductions, which will surely increase due to runaway expansion and significantly impact agricultural and natural values island-wide. The fact that the Maui County Council has pledged financial support to rid the islands of pests already here demonstrates the wisdom of avoiding actions which will greatly increase the number of alien introductions.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 In recognizing the importance of protecting Maui's
 2 ecosystems, we can't fail to appreciate the increased
 3 financial cost of mitigation if we intentionally bring more
 4 pests directly to our door step. Our island economy relies on
 5 sound agriculture and sound tourism. Actions which denigrate
 6 agriculture in the natural setting will resoundingly damage
 7 our tourism base. Without the rich pastoral setting and our
 8 unique wealth of forest life, Maui would be nothing but
 9 another rock in the middle of the ocean.

10 It would be short-sighted to look at the economics
 11 of jobs today when we could be jeopardizing the very tourism
 12 base we are professing to improve. We underestimate the
 13 intellects of our visitors and of one another if we assume
 14 that today's dollar would compensate for the bankruptcy of
 15 spirit and economy which will envelop the island if we allow
 16 our national heritage to be compromised by direct
 17 international flights. Emblematic of this problem is the
 18 planting of Australian tree ferns as landscaping right here
 19 at the airport.

20 Although, its quick growing habit was probably
 21 appealing to the landscaper who chose it, it is a plant whose
 22 airborne spores readily colonize in rain forest settings. In
 23 remote Kipahulu Valley, a far distance from here,
 24 considerable effort has been made to prevent the spread of
 25 this pest which chokes out native species, including native

1 tree ferns. Although, not the only problem relevant to
 2 introduction and spread of alien species, the proposed
 3 airport project will significantly increase the number of
 4 alien species introductions which do occur each year. This
 5 prospect must be thoroughly addressed.

6 Runway expansion is a project with far reaching
 7 effects which encompass our entire island. We cannot face
 8 these challenges with benign ignorance. We must involve all
 9 of the science and collective expertise available to review
 10 potential impacts and seriously consider their effects
 11 before the results of decisions made today become
 12 irreversible. Thank you.

(Audience applauding)

13
 14 MR. STEVEN MOSER: My concern as a physician
 15 here on Maui is with the health and environmental aspects
 16 with the extension of the runway and internationalization of
 17 the airport. Therefore, I was keenly interested in what these
 18 five volumes would say in these areas. Surely, in all of its
 19 verbiage, I would find reasoned arguments to satisfy my
 20 concerns in each of these areas. What I found instead was
 21 health care covered in two pages, schools in one page, police
 22 and fire in one and a half pages, and so on. Alien species
 23 was covered and barely even addressed to the EIS.

24 It appears that instead of addressing these areas
 25 of impact, the EIS attempts to perform a slight of hand by

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1 reintroducing a logically flawed reasoning process that was
 2 used first in the final environmental impact statements of
 3 the State of Hawaii 1992.

4 The Draft Environmental Impact Statement refers to
 5 its use of a revised SASP forecast for visitors to the
 6 Hawaiian islands over the next 15 years. In the states final
 7 Environmental Impact Statement of 1992, to which the DEIS
 8 refers, the Draft Environmental Impact that we're looking at
 9 now refers to, the regional SASP forecaster said, quote,
 10 "Represents unconstrained demands, i.e. they assumed that the
 11 airport facilities necessary to accommodate the forecast
 12 level of activity will be provided".

13 Further, on page 45 of the 1992 state environmental
 14 impact statement, it says "The forecast contained in the SASP
 15 assumed that the airport improvements recommended in the SASP
 16 report, which Kahului Airport included an extension to the
 17 existing runway to 10,500 feet in the construction of a
 18 parallel runway by 2010 would be made. Since the improvements
 19 recommended in the preliminary draft of the Kahului Airport
 20 master plan update study are generally consistent with those
 21 envisioned in the SASP, the SASP forecast represents the
 22 level of activity anticipated if the master plan
 23 recommendations are implemented".

24 I'm now going back to my statement. That was all
 25 from DEIS. The current DEIS uses the same flawed circular

1 logic as is found in the state EIS as used for the SASP
 2 forecast. It assumes that there will be a 9,600 foot runway
 3 in its predictions of growth, thereby disallowing the
 4 possibility of leaving the airport truly status quo by not
 5 lengthening the runway.

6 Succinctly stated, the no-change scenario is
 7 considered in the Draft Environmental Impact Statement to
 8 include the 9,600 foot runway extension because the visitor
 9 numbers projected in the SASP reports, both the original and
 10 revised, are made on the premise of a runway extension. This
 11 magic trick of starting with a premise that 7,000 feet equals
 12 9,600 or 10,500 feet allows the drafters of the EIS to
 13 conclude the runway extension internationalization will have
 14 no increased impacts. And this invalidates the whole EIS, as
 15 far as I'm concerned.

16 Even given this premise of equal growth under any
 17 scenario, the Community Resources Inc. Social Economic Impact
 18 Assessment in Appendix E clearly defines about a 20 percent
 19 increase in the 2010 visitor arrivals and average visitor
 20 census when it compares constrained versus unconstrained no
 21 action futures in its sensitivity analysis. Twenty percent is
 22 an enormous difference in terms of numbers of people on this
 23 island at any given time. So this report also cautions over
 24 and over that all of the variables are subject to great
 25 uncertainty because there are so many variables.

DEIS Response

1 There are many other concerns I have included in my
 2 written comments. But, in conclusion, I must express my
 3 profound distrust of this EIS and the biased spirit in which
 4 it was written with its carefully plotted and hidden false
 5 premises and resulting in unbelievable conclusions. It's
 6 almost cynical in its disallowing any discussion of the true
 7 impacts that this project will have. The only really
 8 impressive impact is that A & B will get eleven million
 9 dollars for the land that it's selling and, of course, they
 10 were consulted but not Haleakala Park.

11 (Audience applauding)

12 MS. MARY EVANSON: Good evening. I think all
 13 of us have an awful lot of things that we want to say and
 14 it's extremely difficult to say it in three minutes and I
 15 will be sending in written comments.

16 The request for the National Parks Service to be a
 17 cooperating agency in the preparation of the EIS was denied
 18 in part because it was stated that the service has no
 19 jurisdiction or special expertise within the airport area.
 20 How nice it would be if all of our concerns and the alien
 21 species and diseases would stay within the airport area
 22 proper. Of course, that's not the way it happens.

23 On numerous occasions I have seen tour buses load
 24 up out in the terminal for a direct trip up to Haleakala
 25 National Park where the passengers get out at both park

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1 headquarters in the visitor center at the crater rim. This
 2 activity is certainly a direct link between the airport and
 3 the national park.

4 Dr. Lloyd Loope and his highly qualified staff at
 5 the National Biological Services have that special expertise
 6 due to their many years of studying Maui's environment and
 7 the threats to it. They know that what happens in Hana,
 8 Lahaina, or Kahului Airport can have a direct impact on
 9 Haleakala and the surrounding natural areas.

10 An extended runway to accommodate flights to and
 11 from the Midwest will accommodate flights to and from Asia.
 12 The Hawaii Visitors Bureau recently signed a contract with a
 13 Bangkok base travel firm to sell Hawaii in Thailand,
 14 Malaysia, Vietnam and other Asian countries, all tropical
 15 countries with climates similar to ours, whose pests and
 16 diseases would flourish here.

17 Millions of potential tourist dollars to quick fix
 18 Hawaii's economy but at what cost to Hawaii's environment and
 19 to its people. In January, our Governor said that his
 20 administration would work to promote visitor industry by
 21 building airport facilities on neighbor islands which would
 22 allow direct international flights. And more recently he
 23 said that there were two nations besides Japan wanting to fly
 24 directly into Kona and Maui.

25 With all of the talk of world trade and world

See Response PH-11

1 economy, we're vulnerable. County and state laws cannot
 2 preempt federal laws or international pacts. If the runway
 3 is long enough, we will have an international airport. Pure
 4 and simple. Let our visitors come to Maui by way of Kona or
 5 Honolulu. It will take a little longer, be a bit
 6 inconvenient, but Maui needs special care and attention. The
 7 Maui Visitors Bureau could well use this tactic to sell Maui.
 8 Travelers don't mind being a bit inconvenienced to get to a
 9 very special place, such as Maui.

10 Because our economic well-being depends on the
 11 beauty and health of our environment, we must insist that the
 12 best available technology for inspecting incoming passengers,
 13 baggage, cargo and planes be put into place now. This state
 14 must provide adequate funding for more inspectors, better
 15 equipment and an enclosed building for inspecting cargo
 16 containers. When cargo containers come off planes now they're
 17 taken over to the cargo area and they open the doors outside.
 18 If something flies out, they slam the doors real quick.

19 We must do whatever is necessary now to stop the
 20 introduction of destructive pests and diseases. It is a
 21 statewide problem but Maui is more vulnerable than most and
 22 we must insist that control measures are implemented now.
 23 Let's stop the talk and let's take action. But, most
 24 important, we cannot have an international airport on Maui.
 25 And I again repeat, a runway long enough to accommodate

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1 international flights and we will have an international
 2 airport whether we want one or not. Thank you.

(Audience applauding)

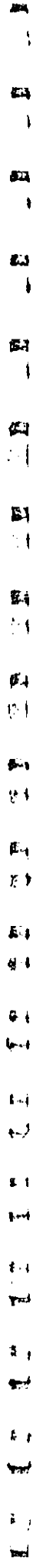
3
 4 MR. A.B. HUGHES: It was a little difficult to
 5 decide which side of this argument to be on. First, I'm a
 6 biologist and I have supported some of the battles to save
 7 the environment and I will in the future. I am very concerned
 8 about the possibility of introduction of alien species to
 9 Maui, particularly the green tree snake, rabies and various
 10 destructive pests and insects. We must have some way to deal
 11 with this problem. But I think we're also ignoring the
 12 possibility of these pests coming in via surface.

13 We don't do anything about inspecting containers,
 14 no matter where they may come from, that come into Kahului
 15 harbor. There has to be some way to deal with the problem and
 16 I don't know what it is. But anyway, I, like most people
 17 here, I have to travel to the mainland occasionally. Every
 18 time I go, it takes a flight through Honolulu. It just adds a
 19 couple of hours to the flight. One time the trip from here to
 20 my parents home took 18 hours. This just really is totally
 21 unacceptable.

22 Now some people suggested that they don't like the
 23 growth they've seen on Maui. You know, we really cannot stop
 24 growth, whether we lengthen the runway or don't lengthen the
 25 runway, Maui is going to grow. There's no way to stop that.

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See Response PH-1



1 When I moved here I couldn't get brake pads for my kids bikes
 2 and I ended up having to go to the mainland for another
 3 reason and got them in Houston. I once lived -- well, I live
 4 now in Pukalani and we once had this dangerous curving bumpy
 5 highway that came down through Pukalani. Nobody -- the police
 6 didn't give tickets because anybody that drove faster than 30
 7 miles an hour were wrecking their car.
 8 We don't necessarily lose anything with some of our
 9 improvements. Traffic to and from the airport has to go
 10 through the K-mart, Costco Dairy Road bottle neck. Something
 11 has got to be done about that intersection. We have to get an
 12 overpass to take this airport traffic, whether the airport is
 13 lengthened or not. It's got to be done.

14 Like others here, I don't want to see Maui change
 15 until it's like Honolulu or like Miami Beach. But, actually,
 16 I firmly believe that whether the runway is extended or not,
 17 it really has very little change on whether Maui is going to
 18 grow or not. It's going to grow. People are going to come
 19 here retiring from the mainland and it's going to grow. You
 20 can't keep that from happening.

21 I have two boys, two girls, two grandchildren and
 22 two son-in-laws, none of those 8 live on Maui. Why not?
 23 They're living in Honolulu where the jobs are. They're living
 24 elsewhere. I believe there have been at least two occasions
 25 when airplanes landed on the short of the runway here. In

1 both cases the airplanes were destroyed. This is going to
 2 happen again if we don't lengthen the runway. It could
 3 happen even if we lengthen the runway but it's less likely if
 4 we have a longer runway.

5 So, in conclusion, the most important consideration
 6 that I have is safety to the general public. All of us
 7 eventually must travel by air and we deserve as high a
 8 probability of getting back alive as possible. There already
 9 has been a case of a damaged Aloha Airlines airplane landing
 10 here. Everybody here knows about it. That airplane came in
 11 fast. It was a miracle that they stopped the airplane before
 12 it ran off the end of the runway and ended up in the ocean.
 13 There would have been a lot of people killed if they hadn't
 14 been able to stop before they ran off the end of the runway.

15 MR. DAN JUDSON: Good evening. My name is Dan
 16 Judson. I'm the owner of an orchid nursery. I'm a flower
 17 farmer also, Orchids of Erlinda. I think it's ironic that we
 18 have to use this kind of equipment here, provided, I guess,
 19 by the FAA. The mediator has a better mic than we do. Anyway,
 20 this, to me, is sort of symbolic of the FAA and the
 21 Department of Transportation arrogance that we're seeing in
 22 this kind of report. And also the equipment that they're
 23 giving us to use here tonight to address each other.

24 First of all, the FAA says that the airport is safe
 25 now as designed, so I don't think the issue of safety should

no provisioning for that in this document.

Okay. As far as the final thing that I see about this is that the state has chosen to hold improvements to the access road contingent on the lengthening of the runway. And that doesn't show acting in good faith to me, they're using this carrot and stick approach, that come on, you guys, lengthen the runway and then you guys get your access road. Well, that looks a little bit extortionist to me but maybe that's where the Department of Transportation is coming from. I tend to think it is and that's where I feel this whole arrogant attitude of this whole thing with the FAA and the Department of Transportation is coming from. Thank you very much.

(Audience applauding)

MS. DEBRA SULLIVAN: Aloha! My name is Debra Sullivan. I'm a concerned citizen of Maui County and I'm here about a couple of things. Number one, I was the person in my office that had to go down and pick this EIS up. I was told please bring a hand truck. And I do have some comments about that. Stacked high, there was easily 10 inches of two page copy to read in these five volumes. The chapters are numbered and the pages within each chapter are numbered but there are no total page numbers to this EIS.

I began to attempt to list that volume number this afternoon by doing volume, chapter number, related pages, but

be what we're concerning ourselves with here. The FAA recently just lowered helicopter operations from 1,500 feet back to 500 feet. Okay. I don't think the FAA can be trusted to act in good faith. And this is where my concern is as far as this is concerned, this environmental impact statement, I think, shows real bad faith.

Alien species introduction. Consulting a federal agency that asked to be consulted. Where was that at? Oh, well, we're just not going to do that. That's not going to look too good in the report but we're just not going to do that.

As far as internationalization goes, within a 100 miles of here now with Kailua-Kona joining us and Honolulu, we have two international airports. You know, the only other places that have two international airports within 100 miles of each other are places like the east coast. Okay. We don't need an international airport here and that's what lengthening of the runway is going to do. It's going to internationalize this place. We don't have existing places right now for the international flights. It was pointed out that the international flights were arriving here, that's great. We don't have -- adequate to handle that as far as interdicting species, bugs that are coming in and they're already landing right now. Now we're going to increase the number of flights that are going to be coming in and there's

See Response #1 and #11



1 the job was so incredibly burdensome that I gave up on my
 2 original idea of timing my reading of the EIS by counting the
 3 pages dividing my time, because I can't read it all at once,
 4 I've got to read it in spurts for my job.

5 I just think that it's not fair to the public to
 6 give anybody a document like this and expect it to be a
 7 concise -- you know, something that will read. The public has
 8 a right to information given to them in a concise manner and
 9 I think this is wrong. Also, I do agree with Charlie Maxwell
 10 about the accessibility of this meeting, although some of us
 11 made it. No where in this ad that came through -- and I made
 12 four phone calls today before I found out that parking was
 13 validated. The first thing out of somebody's mouth was "I'm
 14 not paying to go to a public meeting". No where in here did
 15 it say anything about that.

16 This is the end of the airport area and it is maybe
 17 fitting for this. Again, I disagree with the equipment here.
 18 I'm happy to see a Kaku TV community television here so that
 19 we can see this on TV later, since I won't be able to stay
 20 tonight. I have other comments, some about I'm a pilot's
 21 daughter. I do think we need to have a longer runway
 22 sometimes to land in case of a disaster. I'm on the American
 23 Red Cross Advisory Board, also the Disaster Action Team.
 24 There are issues, there are alternative plans. In fact, if a
 25 lot of people don't know, if this airport does not survive a

1 disaster, and there's a good chance it won't, being on the
 2 north shore, the alternate airport route for Civil Defense is
 3 from Hana Highway up to Haleakala. I mean, the next time you
 4 drive up there envision C-130s fully loaded landing there
 5 because we won't have that road during a disaster. We don't
 6 have any gas either because all of our gas stations on this
 7 island are electrically pumped.

8 But just to let you know that the airport issue for
 9 safety is tangible in a disaster because it may or may not be
 10 here. I am an equestrian. I am also a mountain hiker. And,
 11 like a lot of people in this room tonight, I think that -- I
 12 personally think that our most precious resource is the great
 13 forest and protected lands. Just as many visitors and
 14 residents wander our trails as enjoy the waters around this
 15 area. And, again, I feel that this particular airport is
 16 extremely easy for anything to fall off an airplane and get
 17 in here. This is not Honolulu. This is not the lava fields of
 18 Kona. There is wetlands right here that we work so hard to
 19 protect and then there's the cane field right here.

20 I have friends with a horse business right down the
 21 street and I really fear the day that I've got to carry a gun
 22 when I ride my horse so I can shoot brown tree snakes. I have
 23 a friend from Guam who told me that she just returned to Guam
 24 to visit her family. Birds have not sung in Guam for almost
 25 10 years now. Since the introduction of the brown tree

See Response PH-1

1 snake, birds don't sing there anymore. She said the most
 2 incredible thing she went back this year was the birds don't
 3 sing. So I do have a real problem with this EIS as its been
 4 given to the public and I thank you for the opportunity to
 5 speak.
 6 (Audience applauding)
 7 MS. RENATE GASSHANN-DUVALL: Good evening. My
 8 name is Renate Gassmann-Duvall and I'm speaking on behalf of
 9 myself, my husband, my daughter and my son, as well as I'm
 10 speaking on behalf of birds of Kanaha Pond. I have a
 11 background in veterinary medicine with a specialist degree in
 12 avian medicine. I worked as a Veterinary consultant for the
 13 State of Hawaii from 1985 to 1990 and I worked in the
 14 Endangered Species Facility and I'm a resident of Maui since
 15 1986.
 16 The sheer volume of the Federal Draft EIS made it
 17 impossible for me to review the environmental aspect in any
 18 depth. Therefore, I will focus today only on some of the
 19 issues of airport expansion which impacts our waterbirds,
 20 especially the endangered Hawaiian Stilt, the coot and our
 21 Koloa, which is the Hawaiian duck.
 22 Despite working for many years on, and at, Kanaha
 23 Pond Wildlife Sanctuary, I gathered most of my intensive
 24 knowledge in 1994 during my month long study at the Kanaha
 25 Pond Wildlife Sanctuary while on a federal grant, as well as

1 through my position as the Chair of the State instituted
 2 Kanaha Pond Advisory Committee.
 3 It was during this time that I had a first-hand
 4 chance to partially observe some of the faunal studies, the
 5 bird studies, described in Volume 5 of the EIS. Those studies
 6 focused on the question if noise or lights from airplanes
 7 flying at night in approach to runway 5-23 would cause
 8 disturbance of endangered water birds. This runway will need
 9 to be closed for up to two months if runway 2-20 is ever
 10 lengthened.
 11 On December 10, 1994, a field survey of the effects
 12 of night overflights by five large and two small aircraft on
 13 endangered wildlife at Kahana Pond was conducted by the
 14 Department of Transportation, Airports Division. During the
 15 same time, both myself and my husband Fern, who worked as a
 16 biologist for the Divisional Forestry and Wildlife,
 17 positioned ourselves at the southeast corner of Kanaha Pond
 18 Wildlife Sanctuary and also observed and recorded the birds'
 19 reactions to plane lights and noises.
 20 The results between the Department of
 21 Transportation Air Division and our study were not
 22 comparable. Volume I of the DEIS, Section 3.11.22 mentions
 23 that there are no correlation between the Hawaiian Stilts
 24 responses and aircraft overflights, even though my husband
 25 and myself recorded both disturbances and consistent

See Response FH-10

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 reactions to the planes.

2 Our observations showed that two to three Stilts
3 flew away when large turbojet aircrafts were approaching.
4 Other discrepancies were also noted, for example, even the
5 positions of the Department of Transportation observers for
6 the observation periods at night were inaccurately mapped.

7 This is the map which was published in the DEIS
8 and, for instance, this position which is mapped in this
9 location, were never in this location. This position number
10 three was in different location, which is here. Our position
11 was here, so we could clearly observe where the people were
12 standing, which were observing the birds' reactions and which
13 were observing the noises which were made by the airplanes.

14 So this was a mistake.

15 The field survey of night overflights conducted by
16 the Department of Transportation on December 10 for the EIS
17 lacks accuracy and its results of non disturbance to birds
18 are, at best, questionable. Mitigation plans still need to be
19 better addressed for the impacts increased airplane traffic,
20 especially at nighttime or low approaches at Kahana Pond.

21 Another serious threat to Kahana Pond Wildlife
22 Sanctuary and all of its vegetation and wildlife is the
23 planned recommended development of the fuel pipeline from the
24 harbor along the makai border of Kahana Pond. This pipeline,
25 even if its development is scheduled several years from now,

1 poses a serve problem since any break would put fuel into
2 Kahana Pond. The pipeline is scheduled to be built
3 underground, therefore it will be hard to detect breaks
4 quickly. Also, it will be in flood and tsunami zones and
5 vulnerable to damage. This pipeline should not be routed
6 along any border of Kahana Pond.

7 In conclusion, the draft EIS still contains
8 misleading assessments, faulty study reports, and proposes
9 developments which will cause severe environmental impacts.
10 It's a shame so many trees and taxpayers dollars were
11 sacrificed for such a shoddy result, especially since Maui
12 does not need an expanded or international airport. Thank you
13 for your time.

14 (Short break in proceedings at 8:45 P.M.)

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C E R T I F I C A T E

STATE OF HAWAII)
CITY AND COUNTY OF HONOLULU)

I, Lisa Groulx-Thompson, Notary Public, State of Hawaii, do hereby certify:

That on May 8, 1996, that the EIS Public Hearing was taken down by me in machine shorthand and was thereafter transcribed; that the foregoing represents a true and correct transcript of the proceedings had in the foregoing matter.

I further certify that I am not attorney for any of the parties hereto, nor in any way concerned with the cause.

DATED this 20th day of May, 1996, in Honolulu, Hawaii.

Lisa Groulx-Thompson

LISA GROULX-THOMPSON, COURT REPORTER
Notary Public, State of Hawaii

My Commission Expires: 5-15-98

AIRPORTS DIVISION
DEPARTMENT OF TRANSPORTATION
STATE OF HAWAII

IN RE: KAHULUI AIRPORT)
EIS PUBLIC HEARING)
-----)

COPY

VOLUME II

Transcript of Proceedings,

Taken at the Kahului Airport Terminal, Gate 39, Maui, Hawaii 96793, Commencing at 7:05 p.m., on Wednesday, May 8, 1996, Pursuant to Notice.

Reported by: Cindy K. Denholm, Court Reporter

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EDWARD K. MOHA & ASSOCIATES

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AGENDA

Continued Comment Period - (Various Speakers)

(Environmental Impact Statement Hearing

dated May 8, 1996)

HR. DOUG MAC CLUER: Ready, set, go.

Good evening. My name -- oh, we're not on the clock. Okay, I won't touch the mike.

Good evening, my name is Doug MacCluer.

I'm plantation manager for Maui Pine. I've been doing that for about -- I've been working for Maui Pine for over 30 years. I also have a family farm. My wife and I farm, have for close to 30 years.

I'm chairman of the central Maui Soil and Water Conservation District. I'm on the state's Non-Point Source Pollution Committee, member of the State Water Commission, Water Rights Committee, among other things.

I'm here to speak about two items. One is about the pineapple industry in Maui Kai, and the second is my feelings about the alien species.

The pineapple industry has been greatly reduced in the last number of years, primarily because of foreign competition. Dole and Del Monte moved out basically all their canneries out of the United States to foreign countries, and Maui Pine has been trying diligently to survive. It's been very difficult, but we have been able to, because

1 of strong loyal commitment from people like the
 2 Cameron family and the Windward foundation, our
 3 employees, and we've been very innovative and
 4 continue to have this fight to stay alive. We
 5 believe in open space. We believe in providing
 6 jobs for our people and taking care of our mountain
 7 and our land.

8 The can business obviously, as I said,
 9 was tough. The fresh-fruit business is not a piece
 10 of cake either. We were in the shipping of surface
 11 containers from here to the mainland. We tried
 12 that for about two years. The problem with
 13 shipping surface pineapple from here is all ships
 14 go from here to Honolulu before they go to the
 15 mainland, and in so doing you've got at least a
 16 two-day delay, two- or three-days' delay.

17 Two- or three-days' delay on a perishable
 18 product doesn't cut it when we're competing with
 19 Dole's fresh fruit or Del Monte's that's coming
 20 from Oahu. So we don't make it in that market, and
 21 we were forced to give it up.

22 On the air shipment we have really a
 23 greater demand than we can supply. It's always a
 24 balancing act. The problem that we have here is
 25 that we cannot consistently get our products off of

1 this island because of the lifts. With the length
 2 of the runway and Kona weather, we get stuck. It
 3 gets dumped here. We can't get it off. So if
 4 there's a bunch of luggage, passengers and such, we
 5 have ended up with over 30,000 pounds some weeks
 6 stuck here on the island of Maui.

7 Without the fresh-fruit business it is
 8 very difficult for us to compete long term with
 9 foreign producers. We're crying. We're doing a
 10 lot of innovative things. We're putting about five
 11 million dollars worth of capital back into the
 12 business this year to try and get innovative, but
 13 it's tough.

14 I would like to speak on the
 15 environmental issues. I am an environmentalist. I
 16 am terribly concerned with what's happened. We've
 17 seen the leaf hopper which is killing our luhiehu
 18 in the mountains. As a farmer we're concerned
 19 about what's going on there. I have sat in with
 20 the Pueo people and with the collision against the
 21 runway. One thing we all agree on, if we don't
 22 address the alien species problem, we are -- we're
 23 just not cuttin' it.

24 We're going to have to work together. I
 25 think that personally the airport situation that we

See Response PH-15

See Response PH-1

PH-15 PH-16 PH-17 PH-18 PH-19 PH-20 PH-21 PH-22 PH-23 PH-24 PH-25 PH-26 PH-27 PH-28 PH-29 PH-30 PH-31 PH-32 PH-33 PH-34 PH-35 PH-36 PH-37 PH-38 PH-39 PH-40 PH-41 PH-42 PH-43 PH-44 PH-45 PH-46 PH-47 PH-48 PH-49 PH-50 PH-51 PH-52 PH-53 PH-54 PH-55 PH-56 PH-57 PH-58 PH-59 PH-60 PH-61 PH-62 PH-63 PH-64 PH-65 PH-66 PH-67 PH-68 PH-69 PH-70 PH-71 PH-72 PH-73 PH-74 PH-75 PH-76 PH-77 PH-78 PH-79 PH-80 PH-81 PH-82 PH-83 PH-84 PH-85 PH-86 PH-87 PH-88 PH-89 PH-90 PH-91 PH-92 PH-93 PH-94 PH-95 PH-96 PH-97 PH-98 PH-99 PH-100

1 have right now can be a vehicle for us to address
 2 all alien species coming in, not only at the
 3 airport but at the harbor because in my opinion
 4 we're getting as much through the harbor and as
 5 much through freight as we are in people's luggage.
 6 I don't think we're gonna get many brown
 7 tree snakes in people's suitcases, but I sure worry
 8 about it in other freight and other ways. We're
 9 going to have to address it, and I appreciate
 10 everyone's concern. Thank you.

11 (Applause)

12 MS. KATHY BUNGARZ: Hello. My name is
 13 Kathy Bungarz. I represent many others who,
 14 because of job responsibilities and small children,
 15 weren't able to come tonight. I especially speak
 16 for the sakes of our children, some of which are
 17 Kawena, Keena, Kaipō and Dillon.

18 For the last 12 years I have worked with
 19 and managed businesses here on Maui which depend on
 20 tourism. Visitors account for 85 to 95 percent of
 21 our business. The majority of these visitors who
 22 have visited Maui in past years have expressed
 23 concern and disappointment regarding the rapid
 24 overbuilding and continued overcrowding of our
 25 small island.

see Response PH-2

1 Extending the runway contributes to the
 2 end of the good life here on our beautiful island.
 3 The main ingredient that fueled this travesty are
 4 greed, fear and ignorance. The old-boy network is
 5 still wielding its power. Maui needs people who
 6 love it to fight for it now.

7 Most of the bureaucrats and politicians
 8 are not working in the interests of the people that
 9 live here. Their plans and maps do not even deal
 10 with the dangerous probability of the alien species
 11 which could destroy the environment on our island.

12 There is nothing in our constitution
 13 which supports runaway growth or runaway growth.
 14 Again, since our so-called leaders are not doing
 15 their job of protecting our island, we must do it
 16 ourselves.

17 Most of us love this island and its way
 18 of life. Let us stop -- let us start to limit
 19 growth for the sake of ourselves and our children.
 20 The runway is long enough.

21 (Applause.)

22 MR. JACK THOMPSON: I find some
 23 inadequacies in this report. Some are omissions;
 24 some are contradictory. Some conclusions are based
 25 upon poor assumptions, and most of the material

1 visitors to come, resulting in more residents.
2 Internationalization will bring more people in more
3 airplanes from more global areas.

4 Much is made throughout this document
5 that international means Japan. The study bases
6 its visitor assumptions on Japan being the only
7 country who will take advantage of the direct
8 flights. This is shoddy guess work. We already
9 have regular Canadian flights. Germany, France and
10 Spain have discovered Maui because of our wind surf
11 qualities, and can it be long before there are
12 direct flights from those countries as well?

13 I have an additional amount of testimony,
14 and I will do two things. I will submit this in
15 writing, and I will wait until the end and come
16 back. Thank you.

17 (Applause.)

18 MR. LARRY FEINBERG: Yes, I've come here.
19 It's taken me ten years to get here. There are
20 some people in this room that have been fighting
21 this fight for the last ten years. And when I
22 first heard about it I said, "Once it's in the
23 paper, it's going to happen." And you can see that
24 by the room that we're standing in.

25 One of the other reasons I came to this

1 meeting is I always wanted to come down to this
2 part of the terminal to see what it was about. I
3 said, "Hey, look over here. They got Chicago in
4 Maui. What do you know about that?" You also knew
5 about it because as soon as they announced it,
6 within, what, a year they closed the road that went
7 right from the airport right up to Haleakala. They
8 didn't tell anybody. They just closed the road
9 like that. So they're doin' it.

10 Why I came here tonight was not so much
11 for me or for you. It's for my daughter. My
12 daughter is deathly afraid of snakes, and I can
13 always tell her that, "You live in Hawaii. You
14 live in Maui; that there are no snakes here. You
15 don't have to be scared to go outside. You don't
16 have to be scared to go in the forest. You don't
17 have to be scared to go in the crater or walk in
18 the tall grass," and that goes for all of us.
19 There are no snakes here, and I want to keep it
20 that way.

21 And I want to be here that, God forbid,
22 if they do this and if these gentlemen have any say
23 in the matter and that they can go back to their
24 bosses or the powers that be, and we can stop it so
25 we can --- because look at all the stuff that's here

1 already that they couldn't stop. They all, "Well,
 2 we can do this." And you read the paper the other
 3 day. The guys that inspect the luggage, "Oh, we
 4 don't have enough manpower to do it." And now they
 5 want to bring more people in. They don't do the
 6 job. They try to do the job. They're very nice.
 7 But, like he says, it's the honor system, and this
 8 is America, and the honor system in America doesn't
 9 work too well.

10 But, like I said, the reason I'm here, so
 11 I can say to my daughter that I did something. I
 12 stood up to stop this; that I did something for
 13 you. And I'm proud to be among the people here
 14 that have been fighting for the last ten years
 15 because I told my wife -- and she's one of these
 16 people that's a big advocate of fighting for
 17 everything, and I'm a pessimist from New York. And
 18 I said, "Once it's in the papers, it's like raising
 19 your telephone bill or raising your cable bill or
 20 anything, they put the press release out and within
 21 six months to a year it's a done deal." Because
 22 it's all done already.

23 And I have to point to this part of the
 24 building. They built the building. They built the
 25 road, and they're gonna build that if we don't stop

1 them. And I give my support to the lawyers and to
 2 the park's departments and to all the people of
 3 Maui here that are here to stop it, and thank you
 4 very much.

5 (Applause.)

6 MR. GREG WESTCOTT: The reason we're here
 7 this evening is because the state Department of
 8 Transportation was forced by the courts to prepare
 9 an environmental impact statement on their work
 10 here at the airport. A new airport was begun here
 11 at Kahului many, many years ago when the state
 12 Department of Transportation began a number of
 13 construction projects. Concerned citizens wanted
 14 to know what was going on, and they shut them down.
 15 And people complained to the courts major projects
 16 would occur, another complaint to the court,
 17 another project, another complaint.

18 Finally after 27 complaints, 27 major
 19 projects, the court said that the state DOT had to
 20 prepare an environmental impact statement on this
 21 project. That project -- for that project they
 22 hired Pacific Planning and Engineering in Honolulu.
 23 They paid them over half a million dollars in
 24 public funds to prepare a document that would
 25 refuse to disclose the true intent of the

1 Department of Transportation, that is to build an
2 international airport here at Kahalui, and to deny
3 the public the right of a fair and adequate
4 assessment of the impact of that project.

5 I remember many years ago at Lihikai
6 School when we had the first scoping session for
7 the first environmental impact statement, and there
8 were a few of us there who were concerned about it.
9 And after we'd spoken, at the end of the meeting
10 Owen Miyamoto, the airport's chief, stood up and
11 addressed us, and he said, "I don't care what you
12 people have to say. We built the H3 freeway, and
13 we're going to build this airport." Now, that
14 pretty much has been the DOT position from that day
15 until now. So that environmental impact statement
16 was prepared. It was challenged in court, and it
17 was deemed inadequate.

18 Now the DOT has been forced to prepare
19 another one, and that's why we're here tonight to
20 look at their recent work. This time they hired
21 Edward Noda and Associates, another company in
22 Honolulu.

23 Noda and Associates have duly prepared
24 another statement that refuses to admit the intent
25 of the Department of Transportation and the extent

1 of this project and once again denies the public
2 the right to an adequate examination of the impact
3 of this project of the internationalization of the
4 Kahalui Airport.

5 This recent work came in. It weighs 22
6 pounds, and I call it the whopper. Now, the basis
7 of the whopper is that the state has no plans to
8 internationalize the Kahalui Airport. Everybody
9 knows that before the runway tarmac could cool
10 down, there would be JAL 747s here at Gate 89. And
11 then shortly after that there will be flights from
12 who knows where. Ben Cayetano is making a deal
13 right now.

14 So this basic assumption leads to all the
15 denials that filled this report. The whopper is,
16 in my estimation, an attempt, a cynical and sad
17 attempt by a public agency to subvert an important
18 environmental law that's been designed to protect
19 the public welfare. It's -- and it cannot go on
20 unchallenged, and it won't go unchallenged. And
21 you can help by sending donations to Maui Mahana
22 (phonetic) Pono, Box 694 Makawao, MHP 694 Makawao,
23 and help in the lawsuit that's going to challenge
24 this sham.

25 And the people involved with the

See Response PH-7

1 Department of Transportation, Edward Noda and
2 Associates and Mr. Wellhouse should all be ashamed
3 at the disservice that they have done to the people
4 on the island of Maui.

5 (Applause.)

6 MS. JODY MITCHELL: Good evening. My
7 name is Jody Mitchell. I was not able to read the
8 DEIS in its entirety, but was able skim through
9 Volume I. Although I did not completely understand
10 everything I've read, I can't help but feel that
11 the conclusions to most of the issues studied in
12 the DEIS were generic. Over and over they repeat,
13 "Will have no significant impact. No mitigation
14 measures are required or proposed at this time."

15 I might not understand completely this
16 draft environmental impact statement, but I do know
17 that a project such as this will, in fact, have
18 significant impacts on Maui, this place I call
19 home.

20 I also found it somewhat confusing. For
21 instance, under Section 6, growth inducing impacts,
22 it states that the proposed project would not
23 necessarily be the cause of growth. Then it states
24 a few paragraphs away that a lengthened runway
25 could potentially induce growth. Which is it?

See Response PH-1

1 Another thing that bothers me is the fact
2 that they feel no mitigation measures are required
3 or proposed at this time. When would they consider
4 it the right time to implement mitigation measures
5 for any of these issues? When it's too late? When
6 we do have brown snake problem? When our
7 infrastructure can no longer support population
8 growth? I do not support this draft environmental
9 impact statement. The people of Maui deserve
10 better. Maui deserves better. Maui no ka 'oi.

11 (Applause.)

12 MR. BREN BAILEY: My name is Bren Bailey,
13 and I actually am here representing 27 members of
14 my family who were unable to come tonight. My
15 family are -- many of them are farmers or cattle
16 ranchers, and we personally are affected by the
17 potential pests. Each year we have expensive costs
18 due to these pests. Unless we protect ourselves
19 against this entity we will find it a very costly
20 situation.

21 Airports are a high risk. We've heard a
22 lot tonight about the brown tree snake, but there's
23 also taro blight and many others that are of great
24 concern. There's almost a limitless number of the
25 alien species that could become established in

PH-1
See Response
PH-2
See Response

See Response PH-1

1 Hawaii.
 2 Just this last month two viruses and one
 3 bug were discovered in Spreckelsville that they
 4 haven't seen before. What future do we want for
 5 Maui, and what are we willing to sacrifice for
 6 that?

7 This EIS has three things specifically
 8 besides this issue that I wish to discuss. We are
 9 expected to have 8 million visitors by 2010. The
 10 infrastructure for this invasion has not been
 11 addressed. Who is going to pay for this?

12 As an example, I have a friend who was
 13 telling me a story. In Santa Cruz County, many
 14 years ago they decided to put a city on the coast,
 15 50,000 people. This is a city that was going to be
 16 developed and paid for by, supposedly by the people
 17 who were putting it together. They would build
 18 firehouses and schools and roads and everything.

19 A statistician came to that meeting, and
 20 he had figured it out. He said that if this city
 21 went in, all of the people in Santa Cruz County
 22 would have to absorb one million dollars in taxes
 23 to support this city. We're gonna pay for this.
 24 The airport people are only gonna pay for those
 25 roads that are directly connected to the airport.

See Response PH-7

1 We pick up the bill for everything else.

2 Noise was not addressed at the EIS. I
 3 live in Keokea. I live near Ulupalakua. I live on
 4 a ranch. I live in the middle of pasture land.
 5 The airplanes taking off at night shake the windows
 6 in my house. That concerns me.

7 The Hawaii Visitors Bureau -- I have been
 8 in business for 25 years. I do a lot of business
 9 with tourists, so I'm very familiar with what they
 10 like and what they don't like. The HVB supports
 11 this airport, as we've heard tonight, and they want
 12 growth no matter what the repercussions are. They
 13 think this attracts quality tourists. Well, if
 14 they truly believe this, then I think on the front
 15 of their brochures they should put a picture of the
 16 airport with a K-Mart. Forget the waterfalls.
 17 Thank you.

(Applause.)

18
 19 MR. CHARLES KOKES: Good evening,
 20 everybody, aloha. We've seen so many things this
 21 evening, so many experts, national experts, local
 22 experts on the fauna and flora, the animals and
 23 plants, the oceans. We've seen some executive
 24 directors here this evening. There's a lot of
 25 heavy weight here from the community, the nation,

See Response PH-7

1 people who represent federal agencies who claim
 2 that they're not appropriately represented, lawyers
 3 representing other agencies who claim that they're
 4 not appropriately represented. I had a nationally
 5 and internationally recognized environmental
 6 specialist say to me as I was waiting in line to
 7 sign up to speak tonight, "Boy, this is where the
 8 action is."
 9 I heard somebody expose earlier this
 10 evening that this controversy has been going on for
 11 ten years. Somebody just said ten years ago when
 12 this first came up that this was gonna happen. It
 13 kind of reminds you of an abusive situation,
 14 something that is impending, imminent, threatening
 15 and awful, something that you feel is gonna be
 16 rammed down your throat whether you like it or not.
 17 It makes these experts stand up here, and
 18 you can see them tremble with rage. You can see
 19 them speak from parched lips. You wonder, "What
 20 the heck is going on?" We've got all these
 21 opinions that say, "There's all these threats," and
 22 we've got all these people who say, "We need to
 23 grow." Well, what is the balance here? Is it just
 24 profit? Is it growth? Is it greed?
 25 We've had growth estimates and observed

See Response PH-12

1 visitor rates that are increasing, but yet they've
 2 been adjusted downward just recently. We have
 3 people who are representing federal and state
 4 agencies and county agencies who are doing a fine
 5 job, people who are doing their best everyday,
 6 people who have given an oath to do their best for
 7 our communities and our country, whatever nation
 8 you may perceive it to be. And are these people
 9 insidious? Are they out to wreck our environment,
 10 to ruin our community, to impair the economy?
 11 Well, wait a minute before you answer that.
 12 These people are being directed and
 13 forced by a perception and orders from agencies and
 14 concerns which have power over them and influence
 15 over them. They're either the federal agencies,
 16 their bosses or their stockholders.
 17 The people that are speaking up as
 18 individuals as experts opposing this plan are
 19 saying over and over again that this ponderous
 20 document here, this pulp, maybe call it fiction,
 21 maybe you might want to call it propaganda because
 22 it leaves out so many relevant things. It leaves
 23 out things which are required by federal mandate as
 24 facilities, and yet there are no facilities
 25 standing in the airport.

1 If we want to make a profit here so that
 2 we can live here and enjoy it here, we need to take
 3 a good look at these pictures on the wall. They're
 4 beautiful photographs. Think of what it would be
 5 like to add another several hundred thousand tons
 6 of asphalt and cement to those photographs.

7 Folks, I want everybody to make a living
 8 here. We all need to make a living here. I'd like
 9 to see Auntie Jane get \$20 for her hamburgers. I'd
 10 like to see the cheapest hotel in Kaanapali go for
 11 seven or eight hundred dollars. Why not? Why not
 12 make \$20 an hour at the local Woolworths or the
 13 mom-and-pop's shops? We could see them all come
 14 back instead of being erased by these large
 15 companies.

16 What's happened is that this document is
 17 not just inadequate, it's completely inappropriate.
 18 We don't need bigger. We need better.

19 (Applause.)

20 MS. SHIRLEY SHEPHERD: Good evening. My
 21 name is Shirley Sheperd, and I'm going to continue
 22 on a little bit from what Charles said. I have
 23 looked through this very weighty set of volumes,
 24 and I got really into Volume I, and I decided that
 25 the -- that the whole thing reveals that the real

1 motive to extend the runway is about
 2 internationalization.

3 And Volume I, traffic-volume estimates,
 4 and this says 8.23 on Page 84. Down here on the
 5 third paragraph it says, "Direct international
 6 flights would therefore account for 6.4 percent of
 7 the total number of passengers passing through the
 8 airport in the year 2010. The forecast assumes
 9 that most of the direct international flights would
 10 originate and terminate in Japan."

11 Then it says that even under this
 12 scenario, if direct international flights were to
 13 begin at this time, the initial frequency of
 14 flights would only be two or three flights per
 15 week. That doesn't sound so bad, does it?

16 Then down here it says, "These studies
 17 conclude that suitable facilities would require a
 18 minimum three-and-one-half-year design construction
 19 period running from project approval to facility
 20 operation and involve the expenditure of between 10
 21 and 15 million 1990 dollars. We all know that we
 22 have inflation, so I think that you can add a few
 23 million to that.

24 My point is: If this all sounds so --
 25 kind of nice and slow and no big problem and we can

1 do it, then how can the Department of
 2 Transportation justify this massive project,
 3 especially when federal and state finances are
 4 worse than any time in history? This environmental
 5 impact statement makes a very poor case for the
 6 expansion of the Kahalui Airport. Thank you.

7 (Applause.)

8 MR. GLENN SHEPHERD: Before we begin, I'd
 9 like to pass this to Mr. Shalapack
 10 (phonetic) to pass on to Owen Miyamoto. He has a
 11 previous bumper sticker that says, "No jumbo jets."
 12 So we're not going to pass this one on to him,
 13 quote, "to speed on his retirement from the
 14 airport's division."

15 (Applause.)

16 The next one will say, "It's too long."
 17 One of the arguments for lengthening a
 18 runway in Kahalui is that it would benefit local
 19 growers in shipping their produce and flowers to
 20 faraway markets by air, but certainly at greater
 21 and higher costs than by water transport. The
 22 complaint against water transport is then that it
 23 takes too long, and the product deteriorates, and
 24 there's overripe on arrival. I wanted you to keep
 25 in mind what Doug MacCluer was pleading for here

1 with this delivery.

2 Well, this doesn't have to be. The
 3 shipping by water transport is a newly developed
 4 and proven controlled atmospheric containers is now
 5 being done on a world-wide basis and done by Maui
 6 pine's competitors. They ship pineapples from
 7 Thailand to Germany cheaper, successfully in these
 8 types of containers. I want to show those to you
 9 here on this.

10 This is done in many places in the world.
 11 Why it's not done here on Maui or in Oahu, I do not
 12 know. I've questioned some people about this.
 13 Doug comes back with the argument, "Well, we tried
 14 that, but our pineapples didn't respire properly."
 15 Well, I submit to him that he'd better get some
 16 pineapples that respire properly because the
 17 competition is beating the hell out of him, and
 18 they're just barely hanging on. Believe me, the
 19 pineapple guys are under the gun, but they won't
 20 use this for reasons which escape me.

21 Now, these are nice containers. They
 22 pick them up and put them on the ship. It takes a
 23 little pre thought about when you're going to ship
 24 it and where it's going to get to, but it controls
 25 the ripening process in the container.

See Response PH-12

See Response PH-12

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 Can we sharpen that up somehow, or do you
2 want to sharpen it?

3 Anyway, if you ship things in the
4 natural -- in the normal reaver containers, for
5 example, apples, they last for 120 days, but you
6 can do this for 180 days in one of these
7 atmospheric-controlled containers. They use
8 different kinds of gases in there for the different
9 kinds of fruits, different kinds of flowers and
10 whatnot so when they arrive at that particular
11 destination, they're perfect; they're ripe. You
12 can do that. They've done this with all these
13 things. This is nothing new, but why Maui Pine
14 doesn't use it, you'd better ask them. I've tried
15 it.

16 One of the other things on this
17 document -- and I want to correct Mr. Westcott. It
18 isn't 22 pounds. It's 22 pounds 8 ounces, and when
19 that thing arrived in my front door, I said, "Oh my
20 God, what's that?" And I called up Noda and I
21 said, "What did you send me?" Because I've been on
22 the other end of the runway with Noda for some
23 time, and you've got to be careful these days. So
24 they said, "Oh, it's the environmental impact
25 statement."

1 Well, I haven't gotten through that
2 thing. Yet though I've had it in hand for four
3 weeks. I'm retired. I don't do anything, but I
4 still can't find time to get through that thing
5 because every time I get my nose into it, I say,
6 "Oh my God."

7 Anyway, one of the other fallacies in the
8 thing is they say they have no noise mitigation at
9 Kahalui School. It was mentioned here before that
10 Owen Miyamoto was talking down there, and the noise
11 was so great that he had to stop talking. Teachers
12 have to stop teaching. Students have to stop
13 talking because the noise is too great. They have
14 no mitigation processes in their whatever.

15 The EIS ignores the fact that noise
16 travels far beyond the stations which they studied
17 or that they modeled by computer models, and
18 therein a lot of those studies are really flawed,
19 along with many other things because if you inject
20 the wrong things in your computer model, you get
21 the wrong output.

22 Aircraft noise varies according to
23 atmospheric conditions. I hear it in Wailuku
24 Heights. People hear it in Pukalani. The lady
25 heard it in Keokea, and under different atmospheric

1 conditions that sound travels far. It shakes my
2 windows.

3 I recorded earthquakes on a seismograph
4 up there and couldn't figure out what it was until
5 I found out that it was aircraft taking off at the
6 Kahalui Airport. Those things are noisy up there,
7 but do you think those people -- that noise goes
8 from that airport up to Wailuku Heights. It goes
9 this way, and they didn't consider Kahului School
10 right here. Their studies are right in there in a
11 pattern like this, and it's absolutely ridiculous
12 that they think they could put that thing over on
13 the public.

14 (Applause.)

15 MS. HASAKO WESTCOTT: Good evening,
16 everyone. This EIS is a sham. What is missing
17 from this self-serving document is the
18 acknowledgement by the Department of Transportation
19 that it plans to internationalize Kahalui Airport
20 as soon as possible. Appendix "G" of the executive
21 summary says, "There is a greater potential for
22 growth-inducing impacts from international nonstop
23 flights than from domestic flights." This induced
24 growth should be the basis for a genuine
25 examination of the impacts of this immense project.

See Response PH-13

1 Instead the summary of impact in Table 14
2 says that on agriculture, socioeconomic, water
3 quality, energy use, solid waste, flora, fauna and
4 wetlands, the impacts are insignificant. And
5 everywhere in the EIS this mantra is repeated, "No
6 significant impacts, therefore no mitigation
7 measures are required."

8 Recent news confirms the state government
9 desire for international flights. On April 30th it
10 was reported that Japan Airlines had been awarded
11 the international Tokyo/Kona route. The following
12 day, Ben Cayetano announced he is negotiating with
13 two other foreign carriers who want direct
14 international flights to Maui. If the runway is
15 lengthened, we would have no power to deny access
16 to international flights.

17 In Section 821 of the EIS says that the
18 Department of Transportation must comply with
19 federal executive orders, and it cannot
20 discriminate against any aircraft that wishes to
21 use the airport.

22 Section 824, "The existing terminal
23 facilities can be modified using partitions and to
24 serve as an interim federal inspection service
25 facility for international flights, accommodating

See Response PH-14

1 two flights a day."

2 Section 4313, "This EIS rejects

3 alternative plan II because the runway is not long
4 enough for direct nonstop flights to international
5 destinations." Because of DOT's failure to state
6 the true purpose of this extravagant project, it
7 has failed to examine the most serious consequences
8 of international flights, the introduction of
9 foreign pests to Maui.

10 In Section 5151, the EIS says that the
11 introduction of alien species is an existing
12 problem. This is an absurd understatement. The
13 present invasion of alien species has created a
14 crisis of extinction in Hawaii. It has also
15 resulted in a three-hundred-million-dollar-a-year
16 loss to Hawaii's agriculture. The magnitude of
17 this threat has led to widespread agreement amongst
18 scientists, farmers, environmental groups and
19 government agencies that stopping the influx of new
20 pests is essential to Hawaii's future well being.

21 The DOT's feeble support of the current
22 failing system is an arrogant denial of the role of
23 airports in this crisis. The Department of
24 Agriculture estimates that 75 percent of alien
25 species arrive in Hawaii by air, and even this EIS

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20 pests is essential to Hawaii's future well being.

21 The DOT's feeble support of the current
22 failing system is an arrogant denial of the role of
23 airports in this crisis. The Department of
24 Agriculture estimates that 75 percent of alien
25 species arrive in Hawaii by air, and even this EIS

See Response #1

1 in Section 31131 calls Honolulu International
 2 Airport, Hickam Air Force Base and Barber's Point
 3 Naval Air Station high risk areas for the
 4 introduction of alien species.

5 If the Department of Transportation were
 6 to offer more than lip service to the alien species
 7 action plan, it would have to respond to this call
 8 to action in the Appendix "Q," quote, "The alien
 9 species problem is growing rapidly, and the
 10 existing programs for prevention and control will
 11 fail to protect Hawaii without significant
 12 improvements."

13 Therefore, until the state is able to
 14 create and fund a program that is successful in
 15 substantially reducing the rate of pests
 16 introduction, the DOT cannot burden the present
 17 system with international flights to Maui. We must
 18 consolidate our efforts and expertise by limiting
 19 international flights to Honolulu.

20 In addition, as a farmer, I'm offended
 21 that agriculture has been used in an attempt to win
 22 public support for this dangerous development.
 23 However, in the Appendix "E" of the executive
 24 summary, this EIS abandons this pretense and
 25 states, "There is no assurance that agricultural

1 products would receive priority. There is no
 2 guarantee of substantial additional cargo space."

3 However, the EIS fails to even mention
 4 the impact of an increase in the importation of
 5 produce in terms of alien species or the economic
 6 impacts of competition with local farmers. Also,
 7 the direct loss of 700 acres of prime agricultural
 8 land is called insignificant, clearly illustrating
 9 the kind of urban thinking that shapes this
 10 document. What is at risk here, what is threatened
 11 here is the beauty and the rare life of our island,
 12 and we can't lose it. E ola mau.

(Applause.)

13
 14 MR. DICK MEYER: About two years ago
 15 there was a scoping meeting here. I made
 16 presentation orally, and I also prepared written
 17 testimony that I submitted. One week ago I
 18 received a letter from the people who prepared the
 19 (inaudible) saying they had not received my written
 20 testimony, and I would hope that I'd find the EIS
 21 adequate.

22 I now have the testimony that I had two
 23 years ago. I'd like to submit it. In the two
 24 years with hundred of thousands of dollars, five
 25 volumes, they could not phone me once. They knew

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 that I had submitted it. They couldn't find the
2 decency or the time to call me to get the
3 information that I had submitted.

4 I also, just as the people from the hotel
5 industry and the Maui business bureau, am concerned
6 about the employees and workers on Maui. I feel
7 that they also will be taken very badly if this
8 airport runway is extended. We have a very special
9 industry here on Maui, the tourist industry, that I
10 fear will be spoiled if this airport runway is
11 lengthened.

12 I talked to several tourists recently.
13 I've given presentations to them and would like to
14 give lectures to him and all of them begged me,
15 "Please, do not extend this runway. We don't want
16 it run. We like it just the way it is. We like
17 the rural nature of Maui. That's why we came
18 here."

19 I'm also concerned that Hawaiian Airlines
20 and Aloha Airlines staff were not considered in
21 this EIS. The statement indicates that these other
22 airlines will be affected, but no mention as to
23 what kind of reductions would Aloha
24 Airlines/Hawaiian Airlines have both in terms of
25 their financial ability as well as the employees.

See Response PH-2

1 If I was Hawaiian Airlines, Aloha, Mahalo, I would
2 be very concerned.

3 Somehow the feeling is of EIS bigger must
4 be better, but that doesn't seem to be your case
5 here. But it does have information in here that I
6 think is very significant, and it is important and
7 useful for us. I think it makes the case that this
8 runway should not be extended. It makes the
9 statement in there in one of the chapters in Volume
10 I Section 6 Pages 8 and 9 that internationalization
11 will increase the visitor number to Maui by 11 to
12 21 percent. That's in there.

13 It also makes the statements that
14 internationalization will increase the population
15 of Maui by 9 to 18 percent, depending on which
16 assumptions you use. That would mean if we have a
17 population of Maui now of a hundred thousand, an
18 increase of somewhere between 9,000 to 18,000 in
19 the population. Nowhere else does it describe what
20 the effect on Maui would be if we have a population
21 increase, but it's in there that that would be the
22 effect of this runway extension.

23 Most significantly, we have a tourist
24 product here that's first in the world. Visitor
25 magazines have rated Maui the best quality island

See Response PH2 and PH-4

1 in the world for vacations. This runway will ruin
2 that product.

3 I also refer in one of the volumes, I
4 took a look at Volume III. I couldn't get through
5 all of them. They do a survey of why the Japanese
6 and why mainland tourists come to Hawaii. They
7 give the positives of why they come and the things
8 that would bother them and keep them from coming.

9 First, on both the mainland and as well
10 as the Japanese tourists is nature, scenery,
11 historical sites, beaches, things of that sort.

12 When they talk about the reasons why they
13 would not come, last on the list at 1.1 percent is
14 airport congestion, and that's by people who were
15 here and went back to the mainland after having
16 come to Maui. Japanese tourists came to Maui and
17 went back home. They did not mind taking another
18 plane. There is no need by the tourists. VIS
19 tells us that. I think this is making a strong
20 statement to say we do not need a runway. And I
21 really think that what we need to remember is the
22 old Hawaiian proverb, "Do not kill the nene that
23 lays the golden egg."

24 The product that we have is first class
25 in the world. We are really in danger of ruining a

1 product and hurting employees on this island,
2 making our island more dependent on tourism rather
3 than allowing it to be diversified.

4 The tourist industry would only increase.
5 Other things would marginally increase. I think
6 we're in danger of hurting our island by
7 lengthening this runway, and I think the EIS makes
8 that case.

9 MS. CHRISTINE KAFKA: My name is
10 Christine Kafka. I've been living here for many
11 years on Maui. I've taught in the public schools,
12 and recently I have been working in social work
13 helping families with problems of domestic
14 violence.

15 And I'm here today because I've seen and
16 felt very deeply the impact of our increasing
17 visitor industry and its present unbridled
18 management on the residents of Maui. And this has
19 not been adequately addressed in this environmental
20 impact statement.

21 As we know, if moms and dads are working
22 two jobs or the visitor jobs that are created are
23 cleaning toilets and the real funds are leaving
24 Maui or the islands from multi-national
25 corporations, the impact is substantial on the

See Response PH-2

1 family. And how does it feel if mom and dad are
 2 always at work, and there are more visitors than
 3 residents here, you know, lying on the beaches,
 4 sipping Mai Tai's and out on yachts looking for
 5 whales, and there's no time left for fishing or
 6 growing our own food or walking in the forest that
 7 are very much a part of the culture and the
 8 lifestyle here on Maui.
 9 One thing that puzzles me, as I've
 10 noticed several signs on south shore beaches that
 11 say, "Warning, entering public beach." And what
 12 does that mean? Are the visitors unsafe with the
 13 public?
 14 Hawaii's people can't afford the price of
 15 fish. I think we need to evaluate the impact of
 16 this kind of unbridled growth, not only on the
 17 fragile flora and fauna but the native culture, the
 18 people of Hawaii who live here, and re-evaluate
 19 what our values are. What do we care about when
 20 we're thinking about extending the runway? Is it
 21 the expense of the quality of life? Is it
 22 contributing to a lifestyle that takes more than it
 23 gives back?
 24 And I'd like to see the management and
 25 the planning of Maui County take values into

1 account that would allow Maui to be protected and
 2 be the wonderful place, which is why we choose to
 3 live here.
 4 (Applause.)
 5 MS. SALLY RAISBECK: I wanted to show the
 6 television audience who will be seeing this what
 7 the environmental impact statement looks like, five
 8 volumes, 22 pounds.
 9 THE AUDIENCE: And 3 ounces.
 10 MS. SALLY RAISBECK: And 8 ounces, okay.
 11 My name is Sally Raisbeck. I live in Hailuku. I'm
 12 retired. For 25 years I was a data analyst working
 13 for MIT and for seven years before that doing data
 14 analysis for Stanford Research Institute, and I
 15 know what a good technical report is like.
 16 I am afraid that this one -- although I
 17 certainly haven't read it all. I've looked at
 18 the -- especially the part the about the alien
 19 species introduction and, frankly, it is garbage.
 20 It is total garbage, and the people who have said
 21 that it deliberately obscures the true meaning and
 22 the true impacts by -- in a morass of verbiage,
 23 they are quite correct. It really needs to be
 24 redone because it leaves out the important things.
 25 There are lies of omission, and there are probably

1 lies of commission such as Renate Duvall mentioned.
2 I think that this report needs to be redone. Thank
3 you.

4 MS. MELISSA PRINCE: Hi. I live in
5 Haiku, which is right up the road about 17 miles,
6 actually past there, and I oppose the lengthening
7 of the runway, mainly -- well, for two reasons, the
8 first is the noise, and I can hear the airport, the
9 jets taking off. I assume they're taking off or
10 landing all the way over in our place. And
11 sometimes it's in the middle of the night at
12 midnight I hear a sudden roaring sound.

13 The island of Maui is shaped like a
14 megaphone. It's not like Oahu where the Koolau
15 Mountains sort of keeps the sound of Honolulu
16 separated, but here it's like, you know, the sound
17 just carries and wraps around. And I find that
18 very disturbing.

19 And the second thing is I feel that the
20 lengthening of the runway and expansion of the
21 airport, I wonder about the social impacts, too.
22 For instance, you know, my biggest fear is the
23 increasing drug trafficking. Because, you know,
24 there's only two ways to get to Maui, either by air
25 or by plane, so we know drugs are here. You read

See Response PH-7

See Response PH-2

1 in the paper, "So and so got arrested for cocaine.
2 So and so had" -- it's here. We know. And with
3 the expansion of the airport it's probably
4 inevitable that there will be more drugs, too, and
5 I think that's sad. It's horrible.

6 And also the -- I don't see why we can't
7 just keep the interisland flights coming here
8 because they're already having problems with their
9 budget, and it seems to me that if direct flights
10 come here, that's going to take business away from
11 them, too. So I feel that we should just keep
12 Maui -- you know, just push for -- just keep it
13 this way, and for safety reasons they shouldn't
14 have let those big jets in in the first place. If
15 they really thought it was dangerous, why are they
16 taking lives, you know, people's lives, just taking
17 a chance? Thank you.

18 MR. ROBERT PARSONS: Good evening and
19 aloha. You know, if I've learned anything tonight,
20 I've learned that for EIS documents as well as
21 Maui, bigger doesn't necessarily mean better.
22 My name is Rob Parsons. I'm a small
23 business owner, and I've lived on Maui since 1977.
24 In the 18 years I've lived on Maui, our population
25 has more than doubled. The single most important

See Response PH-14

See Response PH-16

1 factor to this rapid economic growth was the advent
 2 of direct flights to Maui, effectively making our
 3 island more easily accessible to the world.
 4 We have seen a decade and a half of
 5 building, condos, golf courses, mega hotels,
 6 apartments, townhouses, affordable houses,
 7 million-dollar houses, lots of houses. Now we find
 8 ourselves playing infrastructural catchup with
 9 schools, roads, sewage treatment, fresh-water
 10 resources, parks and more.
 11 I firmly believe that that motivation for
 12 lengthening our airport runway has its foundation
 13 in economic concerns rather than safety or other
 14 issues. Our real need is not to make our runway
 15 longer, but to diversify our island's economy so
 16 not all our eggs are in the one basket of tourism.
 17 Our six-volume EIS document strikes me as
 18 a great waste of time, money, effort and paper.
 19 Whom among the people of Maui will venture to the
 20 public library to spend hours -- no, days, weeks,
 21 maybe, shifting through endless statistical
 22 suppositions, contingencies and imagined
 23 projections of degrees and percentages of impact?
 24 To me it's a smoke screen as thick as a sugar cane
 25 burn.

See Response PH-7
See Response PH-12

1 I could have given you the answer in 25
 2 words of less. Will lengthening of the Kahului
 3 Airport runway negatively affect Maui's
 4 environmental, infrastructure and quality of life?
 5 Absolutely, unquestionably yes.
 6 And, yes, we do have needs with which the
 7 DOT can assist us because now we have big-time
 8 traffic on Maui, and for some reason virtually all
 9 of it passes through one intersection at Dairy Road
 10 and Hana Highway.
 11 Still in the process of attracting even
 12 more traffic due to more mega-commercial
 13 construction, let's hope that the planned airport
 14 reliever road is not contingent upon a longer
 15 runway. We need that relief road now.
 16 People don't have any trouble reaching
 17 Maui now. It's after they're here that getting
 18 from place to place becomes unnerving. More roads,
 19 more planes, more tourists, more residents, more of
 20 everything, that's not my vision for the future of
 21 our community.
 22 Our focus to address and appease the
 23 economic concerns of the tourist industry and
 24 building trades is too short sighted. We've
 25 compromised far too much along -- we've compromised

See Response PH-5
See Response PH-12
See Response PH-12

1 far too much along our quest for economic growth.
 2 We've allowed crime, drugs, continued pollution of
 3 air, land and water, depletion of fishing stock,
 4 seaweed and algae growth. These are just a few
 5 more of our concerns.

6 I have a great many acquaintances and
 7 friends in both the hotel industry and in the
 8 construction trades. While these two factions seem
 9 to always uncover statistics indicating their
 10 workers are facing layoffs, my observation is that
 11 these segments of our economy have never been
 12 healthier. It certainly seems that wherever I
 13 travel throughout Maui something is under
 14 construction.

15 Yes, jobs will always be important, but I
 16 believe the soul of our community and island is not
 17 rooted in the dollar bill but in a hundred other
 18 things that preciously make Maui what it is.
 19 Somehow with wisdom and vision lets us work
 20 together and preserve and protect to keep Maui no
 21 ka oi now and for the future. Thank you.

22 (Applause.)

23 MR. CRAIG NALOTE: Good evening. My name
 24 is Craig Nalote. I'm from Lahaina, and after I got
 25 through the traffic jams on the way over here this

1 evening, as I was coming across Kaanapali I
 2 thought, "What a beautiful place this is." And out
 3 of all the complaining I do and all the complaints
 4 I hear, I found myself asking the question, "Isn't
 5 this a beautiful place that we live here on Maui?"
 6 And why has it been so long since I felt that way,
 7 and why does it seem to take longer and longer to
 8 recognize the beauty that surrounds me?

9 It's an honor just to be up here speaking
 10 tonight after all these other folks that I've heard
 11 speak and say so many good things and renew my
 12 faith in the community that I live in. But I am a
 13 little confused. Are we safe, or are we not safe?
 14 Do I get in a plane to take off with people
 15 somewhere in the tower knowing that it's not safe,
 16 or is it safe? Is the community growing or is it
 17 not growing? Is it growing really fast? Does it
 18 need to grow? Will this extension help it to grow
 19 or keep it from growing? Was I the first one to
 20 notice that there was going to be a significant
 21 snag in traffic by K-Mart, or did others know and
 22 have a plan somewhere that they weren't releasing
 23 to me or any of my friends?

24 The SIS statement, now I know why I pay
 25 so much in tax. I have to admit I that haven't

See Response PH-16
 See Response PH-2

1 read the entire thing either. I got maybe two or
 2 three grams through the thing, but I am concerned.
 3 I am concerned enough to be here away from my
 4 family and to get up here, though it makes me
 5 nervous to stand here and to speak after all of
 6 these other folks who I've heard speak.

7 But I am here and I'm concerned. I'm
 8 concerned about the rate of growth on Maui and the
 9 quality of life that we have today and the quality
 10 of the life that my children and your children will
 11 have in the future. While I understand the need
 12 for growth to ensure a healthy economy, I also
 13 recognize the fact that island living equals
 14 limited resources.

15 So growth can be controlled, and sooner
 16 or later growth will be controlled whether we like
 17 it or not. Our main concern is that we don't want
 18 to trash the island before we reach the limit. On
 19 the west side of Maui we're about to lose the last
 20 stretch of undeveloped beach from Puamana to
 21 Kapalua.

22 Some 3,000 plus hotel rooms will spring
 23 up on the north beach, the old airport beach with
 24 the expansion of the mauka side of the highway
 25 scheduled and approved for multi-million-dollar

See Response PH-2

1 development. Once that beach is gone, it will be
 2 gone for good, so I suggest you folks visit it
 3 while it's still open beach.

4 We have traffic problems. We have sewage
 5 treatment problems, as well as fertilizer and
 6 chemical runoff from golf courses causing algae
 7 blooms. We have gangs, car and hotel break-ins.
 8 We have limited water resources with residents of
 9 Monokohau Valley disputing the ownership of this
 10 limited resource. We've had a proposed bypass on
 11 the boards for some 10 to 12 years. By the time
 12 that road is built, we will have reached such
 13 growth that we'll be back to where we started from.

14 If we expand this runway and bring
 15 international passengers, not only do we run the
 16 risk of introducing alien species, but we have --
 17 if we don't have our infrastructure stuff together,
 18 we will have one-time visitors; people who come and
 19 go away with bad memories of Maui.

20 We need visitors. We need local
 21 residents as well, and we have to work within
 22 certain restrictions and rely on each other as well
 23 as our elected officials to protect our valuable
 24 resources, protect the land, protect the water and
 25 protect the quality experience of living and

See Response PH-1 and PH-7

See Response PH-5

1 visiting Maui. It's the only way to ensure that
2 visitors will want to continue to visit.

3 We do not need an international airport.
4 We heard a lot tonight about greed, and think about
5 what that word means, greed, with a capital "G".
6 Remember that the true sign of a healthy community
7 is when members of that community are willing to
8 give back, not just to take out of the community.
9 And we have some people up on the hill that are
10 willing to do just that. I suggest that the DOT
11 needs to get together with the experts on Haleakala
12 and come up with a usable EIS.

13 In closing, I would like to repeat the
14 words that David Wellhouse said earlier tonight,
15 "Don't touch nothing."

16 (Applause.)

17 MR. PATRICK RYAN: My name is Patrick
18 Ryan representing the Maui Chamber of Commerce and
19 its 1,300 members. The Maui Chamber of Commerce
20 supports the EIS for the Kahului Airport master
21 plan as a necessary part of interrelated projects
22 for the future of Maui County.

23 A preferred alternative recommended by
24 the EIS is a mixture of infrastructure improvements
25 representing a plan for the future. It deals with

1 and seeks to provide necessary facilities and
2 infrastructure for forecasted needs as well as
3 correcting current deficiencies.

4 The DEIS, we counted 13 sets of federal,
5 state and county regulations to which the EIS has
6 conformed. Ten alternate plans were investigated.
7 Input was sought from very diverse groups, both in
8 favor and opposed to changes.

9 Who prepares the EIS documents for the
10 various airport plans across the nation? The FAA.
11 This is not a once every five-to-ten-year endeavor.
12 The FAA does this continually while conforming to
13 changing regulations.

14 The Kahului plan does not pretend to
15 solve all state and county problems. Nor does it
16 pretend there will not be increased demand or
17 increased problems without such improvements. Maui
18 has already experienced increased demands and
19 problems developing before good planning. Now is
20 not the time to ignore reality.

21 There will be additional growth in Maui,
22 as confirmed by separate independent studies as
23 well as our own visitors bureau. The correct
24 question is, Will we be prepared this time, or
25 development without planning yet again?

See Response PH-5

See Response PH-2

1 The efficient movement of personnel,
 2 equipment and supplies is still a basic requirement
 3 that is carried out increasingly by air. Halting
 4 the invasion of alien species, which has
 5 effectively been ignored prior to the proposed
 6 airport improvements, must be aggressively
 7 addressed. It is a state as well as a county
 8 problem.
 9 Maui must take a firm and aggressive
 10 position. Our target should be Maui-based
 11 inspectors for flights and other ports of entry
 12 rather than Honolulu-based inspectors. We need
 13 Maui-based inspectors who care about Maui and see
 14 everyday what they are protecting. We have an
 15 opportunity to protect Maui, not to continue to
 16 passively rely on others who are totally out of our
 17 control.
 18 In our world today we do not have a valid
 19 reason to avoid planning for the future. Our goal
 20 is to protect our growing paradise from negative
 21 impact as much as possible through good planning
 22 such as the EIS before us. The fulfillment of
 23 Phase I of the Kahului master plan will allow us to
 24 move in that direction. Thank you for the
 25 opportunity to be heard.

See Response PH-1

1 The chamber is a member of and supports
 2 the Puelo group position in favor of the proposed
 3 airport master plan improvements. We were pleased
 4 the chamber participated with the Puelo group in the
 5 many scheduled discussions with those opposed to
 6 the airport changes. These means facilitated by
 7 Councilman Sol sought to clarify situations and
 8 interpretation.
 9 The Maui Chamber supports necessary
 10 planned improvements that will be used to attract
 11 alternative industries. Maui can no longer only
 12 look to agriculture, tourism, tradition, and other
 13 current interests and in an environmentally
 14 sensitive manner we must prepare and plan for the
 15 future while preserving and understanding the past
 16 and cherished traditions.
 17 Our record of reacting as the future
 18 becomes the present must be corrected. Alternative
 19 industries will enable Maui to more successfully
 20 counter single-sector business cycle slumps and
 21 maintain funds necessary for the county services.
 22 Maui is too dependent on visitors' discretionary
 23 spending. The well-planned airport improvements
 24 will enable Maui to market itself to these
 25 alternate industries.

1 MR. PETER CISCO: I'm Peter Cisco. I
 2 have a few comments to make. I'd like to have one
 3 of those hats that say, '96 in '96' because to me
 4 that means you'll wake up 96 times from sound sleep
 5 in one week, and Haleakala is the only park I know
 6 in the United States that has a fence around it to
 7 keep animals out. What are they going to do? Put
 8 netting over it to keep the bugs out next?

9 I'm a farmer on Maui, and we already have
 10 a problem with water. These tourists are going to
 11 be taking more water than we already have, and then
 12 they're going to create it into sewage. We already
 13 have a sewage problem here. Who has the answers to
 14 these questions? Thank you very much.

(Applause.)

16 MS. ANNIE KEMPER: Good evening. My name
 17 is Annie Kemper. I'm a 4th grade teacher at Kihei
 18 School, and I live in Kihei. I know a lot of you
 19 live up country, and unless you've traveled to
 20 Kihei and traveled on blood alley, otherwise known
 21 as Maalaea Highway, the traffic is incredible in
 22 Kihei. I'll be very brief.

23 I say "no" to the international airport,
 24 and I have a suggestion what the state can do with
 25 all the funds they've been using for this project,

See Response PH-7

See Response PH-1

See Response PH-17 and PH-18

See Response PH-6

1 these studies. I don't know if you had a chance to
 2 read today's paper, but our governor says that he
 3 knows that Hawaii's teachers are underpaid, and he
 4 says, "However, that the state has no money with
 5 which to pay for pay increases for teachers." So I
 6 challenge the governor and the state to use that
 7 money to -- for better schools and to pay our
 8 teachers. Thank you.

9 MR. KEN BARR: My name is Kenneth James
 10 Barr. I'm an ex member of our Maui planning
 11 commission and spend most of my life now driving a
 12 taxi and weaving my way through various streets in
 13 the Kahului industrial area trying to get visitors
 14 out of this airport and to their resorts. But now
 15 it's getting so jammed in there, it's getting to be
 16 a hopeless case. My problems, I guess you could
 17 say I've come out of community retirement tonight
 18 as I feel this is important as a Maui resident.

19 My problems with this EIS are, first and
 20 foremost, Volume I, the figure 219 alleging for
 21 future development is absurd. The most important
 22 aspect of this whole plan is number 7th on that
 23 list instead of number 2. It has to do with the
 24 airport-access road, and it's listed below after
 25 the extension of the runway. So obviously I think

See Response PH-19

See Response PH-2

1 that that should be number one.

2 If there is anyone in here who did this
3 study who sincerely believes that extending this
4 runway is more important than addressing our jammed
5 roadways and traffic jams, I just can't believe
6 that. Yet, this study has the priority ass
7 backwards, just as everything this state does.
8 Take care of its friends and give them what they
9 want.

10 This EIS should be revised to show the
11 airport-access road is the most needed on Maui, and
12 therefore should be a number one priority in the
13 EIS. Only after this road is built, opened and the
14 ribbon cut should any consideration be made to
15 expand this airport.

16 The ongoing widening of Dairy Road is
17 acknowledged to address the growth in the present
18 and future industrial area in that area. It is not
19 the answer to the past, current or future airport
20 traffic.

21 On the impact analysis in Volume I,
22 Chapter 5, Page 2, Page 4 it says, as has been said
23 tonight, "The change in land use is considered an
24 insignificant impact." These words are laced
25 throughout the EIS. This has to do with land taken

1 for airport use and the industrial area.

2 I see this week in the paper that the
3 legislature has allocated 20 million or so for the
4 extension of the runway. I wonder how that could
5 possibly have happened before this meeting before
6 the EIS has even been accepted. If this is true,
7 at least use that money to build the airport-access
8 road around the mess that these past lousy growth
9 decisions have created.

10 The growth projections in this EIS seem
11 so far off base, it needs to be worked over with
12 people on this island who know the real growth
13 situation, find out how overcrowded Pilani Highway
14 are right now with the runway the size that it is.

15 Obviously the cumulative effect of all of
16 these things that bring more and more unchallenged
17 growth to Maui should be addressed in this EIS. It
18 should be realistic and based on what we've seen in
19 the last 15 years for the roads at present. Then
20 add into the equation more people at the same time
21 in bigger planes and present the common sense
22 answer.

23 I agree with Dick Meyer. Before I always
24 wondered why Hawaiian and Aloha never sent anyone
25 of their management to our planning commission

1 hearings on this issue. They must realize that
 2 every mainland or international flight that comes
 3 in here is another three or four hundred fares they
 4 will lose each way.

5 In closing, if you read nothing more in
 6 this environmental impact, I suggest that you do
 7 read in Volume II pages on the corrected part of
 8 the Iwado Court Reporter's section where people got
 9 to speak their heart one on one to the typist.
 10 It's very interesting reading. These kind of
 11 testimonies are what should have been valued, not
 12 the professionally written public relations
 13 letterheaded letters carefully crafted with
 14 money-induced bullshit reasoning that all had to do
 15 with greed for themselves or for their corporate
 16 bosses. Thank you.

17 MS. ENE CLUTE: I support the no-action
 18 alternative regarding the runway lengthening and
 19 parallel runway due to the many inadequacies of
 20 this EIS. For example, to fly from Kahului Airport
 21 with a full tank of aviation fuel will require
 22 large amounts of this fuel to be pumped at the
 23 airport. There is no mediation in the EIS for
 24 cleanup measures in the case of an aviation fuel
 25 spill that may get into the ocean or spill on the

1 land. There may be leaks; there may be spills.
 2 But absolutely nothing was mentioned in the EIS
 3 regarding dealing with these problems.

4 Where will the additional aviation fuel
 5 be stored and in what manner? What are the impacts
 6 of additional tankers of aviation fuel at the
 7 Kahului Airport grounds and driving through our
 8 highways? This aspect of the EIS is clearly
 9 incomplete since it does not even consider these
 10 questions.

11 Equally important is the lack of
 12 mitigation regarding the alien pests. There's no
 13 mention of the use of insecticides that are sprayed
 14 on passengers or in the plane. Dianne Fairchild is
 15 a former flight attendant who lives on Maui. She
 16 has been made ill with chemical sensitivity due to
 17 breathing in insecticides like Raid that was
 18 sprayed in the plane. Will arriving passengers at
 19 Kahului Airport be sprayed with Raid? Will the
 20 state Department of Transportation be listed as a
 21 party to a lawsuit if passengers are made ill?

22 The rental-car areas are in vegetated
 23 green areas, as you will see very clearly on this
 24 photograph that's painted -- pasted to the wall.
 25 You see the ocean; you see the airport, and the

See Response PH-10

See Response PH-1

1 rest of the picture is green vegetation. This is
2 breeding ground for the alien pests that can come
3 on the skin, clothing, hair and baggage of
4 passengers from foreign destinations.

5 We know about lice and ukus here in
6 Hawaii, yet there are unknown pesticide -- pests
7 that can come to Hawaii that are alive and well
8 from foreign countries. However, the EIS does not
9 make mention of any of these concerns. Therefore,
10 I request that it be deemed inadequate, incomplete
11 and unclear, and therefore its approval should be
12 denied. Thank you.

13 (Applause.)

14 MS. HANNAH BERNARD: My name is Hannah
15 Bernard. I'm the co-director of Hawaii Wildlife
16 Funds, a Hawaiian-based non-profit conservation
17 organization. I'm going to be brief because I have
18 to get up very early and go out on a boat and teach
19 those tourists we've been talking about about our
20 endangered marine life. And what I'll be teaching
21 them about tomorrow is this front page article in
22 the news about our sea turtles, the epidemic of
23 sibopapaloma. Ninety-six percent of the turtles
24 that wash up in Maui waters have this disease and
25 it's fatal, and this is the kind of thing that we

1 teach our visitors.

2 What we teach them is that Hawaii has the
3 dubious distinction of being the endangered species
4 capitol of the U.S. It's the endangered species
5 capitol because of the high rate of endonism
6 (phonetic). Our vulnerable island species do not
7 have the adaptations to withstand the onset of the
8 introduced species, like ourselves. Because of
9 that we have lost so much, and what you're
10 proposing would just mean losing that much more.

11 Those of us involved in conservation work
12 in Hawaii feel like we're under siege. In some
13 cases, a few cases, maybe we're holding ground.
14 Maybe there's some improvement, but in most cases
15 we're losing ground.

16 So, for the most part, those of us even
17 working on the water are worried about the
18 extension of the runway because of the
19 akapua (phonetic) concept. Everything that's done
20 on the land affects the water, not only for the
21 land-based animals but for the water-based
22 organisms as well.

23 So many people have already spoken
24 eloquently about what's wrong with the draft EIS.
25 I hope it's a draft, and so I really wouldn't want

See Response PH-1

See Response PH-21

1 to repeat all the great things that people have
 2 said. And I appreciate all the time and effort
 3 that those of you who have been working on this
 4 issue for so long have put into it.
 5 I'd just like to add my voice to -- who
 6 have been the overwhelming voice here tonight who
 7 say it's long enough. Thank you.
 8 (Applause.)
 9 MR. WAYNE N. HEDANI: Good evening. My
 10 name is Wayne N. Hedani, and I'm here before you as
 11 property manager representing Kapalua Land Company,
 12 Limited, an employer of 350 employees at Kapalua in
 13 west Maui. We believe Kapalua Land Company,
 14 Limited supports the proposed extension of the
 15 runway to 9,600 feet and its related improvements
 16 to roads, parks, drainage systems and traffic
 17 improvements.
 18 We believe that adequate time and care
 19 has been spent in reviewing the proposed project,
 20 and that it is essential that we move forward
 21 expeditiously to complete these infrastructural
 22 improvements quickly and completely with due care
 23 given to environmental concerns. Any concerns
 24 raised can and will be addressed.
 25 We have studied the environmental impacts

1 and identified them. We have heard time and time
 2 again the concerns over safety related by the
 3 Airline Pilots' Association's representatives. We
 4 have seen Kona successfully proceed with their
 5 runway extension to 11,000 feet and believe that
 6 this will aid their economy.
 7 It's time that we pay due care and
 8 diligence to improving Kahului Airport in order
 9 that it may adequately address our transportation
 10 needs going into the 21st century.
 11 We could use the construction jobs. We
 12 could use an increase in occupancy. We need the
 13 infrastructure to be able to compete in an
 14 increasingly competitive market place. We need
 15 basic infrastructure to help us diversify our
 16 economy, be it visitor industry, agriculture or
 17 high technology.
 18 Our state is currently hurting from a
 19 downturn in tax revenues. Everyone is impacted
 20 from state and county employees to schools to
 21 parks, to hospitals, to non-profit agencies.
 22 Unemployment and bankruptcies are at an all-time
 23 high.
 24 We have infrastructural dollars available
 25 which can and should be put to good use to

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See Response PH-2

See Response PH-14

See Response PH-2

1 stimulate our economy and establish a basis for a
 2 return to a financially and environmentally
 3 healthier state and county. We should do it now.
 4 If dollars are needed to address alien species
 5 control, we will go after those dollars.
 6 Having our tax revenues and budgets cut
 7 and stretched tight is the opposite of what we need
 8 to fund adequate control and mitigation measures.
 9 Our current do-nothing condition is worse for the
 10 environment than one with full and adequate funding
 11 for inspection and controls.
 12 Our choices are clear. The funding we
 13 need comes only from a growing and vibrant and
 14 healthy economy. Doing nothing only leads to
 15 environmental and economic degradation,
 16 deterioration and decay. We urge you to move
 17 forward expeditiously, and thank you for this
 18 opportunity to offer our comments.
 19 MR. PETER KAFKA: Peter Kafka. I'm
 20 speaking for myself this evening. I shudder at the
 21 prospect of a longer runway and all that it
 22 implies. I shudder just walking down this long
 23 runway down to this meeting area tonight and the
 24 prospect of planes on either side deplaning
 25 passengers right and left like LA or Chicago's

See Response PH-1

1 O'Hare or New York's Kennedy Airport. I would be
 2 dismayed walking against hordes and hordes of
 3 people, and I do not want to see it.
 4 My concern is much the same as everyone's
 5 this evening that has spoken in terms of the
 6 environmental impact, but I'd like to address one
 7 specific thing that I think was not addressed in
 8 the draft EIS, and that's what I'd call the domino
 9 effect. One single detrimental impact of this
 10 island on this island will have a series of other
 11 repercussions that we don't know the end result of.
 12 There's already been a detrimental impact. Just by
 13 the publication of these five volumes of the draft
 14 EIS has introduced how many reams of paper into the
 15 waste stream of this island which we can't get rid
 16 of without shipping it away or dumping it into
 17 landfills that are almost filled to capacity.
 18 How do we unload this stuff? How do we
 19 unload more plane-fuls of garbage, more bottles and
 20 cans and plastic and so forth that we have no way
 21 to get rid of? That's just one impact.
 22 Our roads and highways are already
 23 clogged with vehicles. The more we have, the more
 24 demand there'll be for more asphalt, more concrete.
 25 When this meeting was introduced several

See Response PH-2

1 hours ago there was talk of a clover leaf. As far
2 as I'm concerned a clover leaf is just another
3 alien plant that does not belong here.

4 (Applause.) Why introduce them here? We
5 don't have them now. We don't need them in the
6 future.

7 Larger buildings, more progress that way,
8 cutting off trade winds, demanding more air
9 conditioning, which means more power which means
10 more oil. We don't need those kind of impacts.

11 As far as I'm concerned, the draft
12 environmental impact statement is the first domino.
13 If we swallow it, we're just gonna choke on all the
14 results afterwards. Thank you.

15 (Applause.)

16 MR. ERIC H. KANE: Aloha. He aha I Ka
17 Pono. We all speaking a foreign language here, and
18 I'm not going to talk about the EIS because I just
19 heard about this meeting this evening. But there's
20 much greater implications when we address the pimp
21 and how the big corporate pimps pimp us through
22 economics, pimp us through budget cuts, pimp us
23 through writer bills strapped on to other things
24 which are needed so that we have to mandate an
25 expansion of the airport to get some sort of funds.

1 A long time ago we had this problem of
2 genocide with the Hawaiian nation and, of course,
3 Hawaiian, grandfather pure Hawaiian, and 95 percent
4 of the Hawaiians died based on the influx of
5 diseases. There's no -- nothing in this planet
6 I've seen that would hinder the next influx of
7 foreign diseases, which will make for superb
8 population control. So we do have a real problem
9 here.

10 So Maui was set up as a prime target for
11 the pimp by its inadequacies in the infrastructure
12 of government, like no definition for act. When
13 state law mandates act, it states for act, but yet
14 they can still develop all over because we don't a
15 definition for act. Yet the irresponsible
16 government, which does not represent the people,
17 are still going along without an adequate
18 infrastructure.

19 So everything needs to stop. Everything
20 need to be put in a moratorium, and we need to
21 readapt our lifestyles to be out of the arm of the
22 pimp because as long as we keep feeding into the
23 pimp our oil, our job security instead of looking
24 at a total restructuring and ecologically adaptive
25 resettlement plans, not the urban style New England

1 style plan which is being forced down our necks.

2 I've been arrested 26 times in the
3 sovereign movement because I am a lawful person. I
4 believe in the law. I believe in law enforcement,
5 and I'm not willing to go along with the illegal
6 arms military occupation which is deceiving our own
7 Hawaiian education from our ancestors and as the
8 maka'ainana. We are here to be the eyes and the
9 ears of the land, and we're here in a revolution.
10 So any serious attack against the pimp would have
11 to be a revolution of lifestyle, revolution of
12 being bold enough.

13 The longest I've spent was five days at
14 OCCC. Straightforward, honest, aloha, don't come
15 in and don't do nothing. We really have a way to
16 support, and this comes through the Hawaiian nation
17 to public law 103-150. And the native tenant
18 rights from 1842 which are still in existence today
19 that we just don't know about them.

20 These pimps are using prostitutes like
21 the Chamber of Commerce, prostitutes at the hotel
22 business who, in their sincerity of this economic
23 strongarm have major concerns which are very real,
24 concerns lives and families, concerns food in the
25 mouth.

1 So we are very much strongarmed to go
2 along with this system in this way, and it takes a
3 really bold step and faith and a step to really
4 nurture our living Hawaiian kapuna, and they're
5 dying rapidly. It's the biggest important thing I
6 have in my life is to meet kapuna and have 'em die
7 too soon, and there are so many things that I want
8 to learn that we all need to learn to live here
9 because they had it down. This was one of the
10 miracles of the world, total self sufficiency with
11 no money. Nobody went hungry.

12 Kamehameha went through a New England
13 standard colonial process which really
14 misrepresented the true Alii. We just need to
15 follow Kalakaua and Liliuokalani and just continue
16 from where they left off, and only you, yourselves
17 will need the will to look it up; need the will to
18 really dig deep.

19 It's not easy. It creates incredible
20 duress psychologically, and it creates a real need
21 to pray deep and to use ingenuity and creativity to
22 challenge the system. And all I can say is be
23 alert, be ready.

24 The Hawaiian nation is forming. The puna
25 council is already here, and we are your doorway to

1 success. Nobody else can do it for you. Only we
 2 stand on the Hawaiian Constitution, which was left
 3 through the Liliuokalani (unintelligible) because
 4 it was for the people, not for this corporate and
 5 income-tax structure that says you pay taxes and
 6 you can't vote. You own property; you don't vote,
 7 very manipulative, strongarm of the pimp which is
 8 alive and well.

9 So understand that the pimp very
 10 carefully thinks out its manipulation, very
 11 carefully thinks out its deceit, badmouths virtue
 12 and corrupts beauty, and that's the only intention
 13 is for their own greed. Only intention is short
 14 term.

15 In my life I wrestled my sister away from
 16 prostitution, by literally getting handcuffs, by
 17 fighting, I was dragging her off the street getting
 18 her out of the islands. I know what power the pimp
 19 has and how they hurt us. And with that we all
 20 must pray deeply, and we really have to hit the
 21 heart of what is Hawaii. What is aloha aina, and
 22 put your life on the line because that is what
 23 Jesus did.

24 Jesus was the aloha aina man, and Mary
 25 was the aloha aina woman. And together the pimp

1 corrupted the intent, but it's still alive and
 2 well, just like aloha. The power of our aumakua
 3 will support you who give your life to it and the
 4 aumakua in service of God. There's only one
 5 creator, no denying that. So we have to
 6 acknowledge our parental guardians which are here
 7 to serve us.

8 With that, I take this deep because it
 9 will take a full-out revolution to stop what has
 10 already been set. As you can see, they already
 11 have this built, so just watch and be aware.

12 Aloha.

13 (Applause.)

14 MS. HINA KNEUBUHL: Hello. The crowd has
 15 really dwindled. Half of them haven't heard me
 16 talking and leave already. I would like to say
 17 that I'm here on behalf of myself and also like my
 18 friend, Terry, reminded me, 10,000 Hawaiian people
 19 who can't be here right now but know where I'm
 20 coming from. I really like the cake.

21 Four years ago when I was about 14 years
 22 old I gave a testimony at a hearing in front of the
 23 county council. I really thought that by now this
 24 whole runway extension thing would be resolved.
 25 And it really saddens me that the people of this

1 land are still having a fight against this
 2 extension, and I never thought we'd all be here
 3 discussing the severe inadequacy of EIS.
 4 Many of you here tonight already know
 5 that the agricultural industry loses an estimated
 6 three hundred million dollars a year due to crop
 7 failure by fruit flies. Many of you know that the
 8 taro-root aphid causes a 90-percent crop loss,
 9 which is a staple food of the Hawaiian people's
 10 diet, not to mention apple snails, the brown tree
 11 snake, myconia, and the 39 flesh-eating piranhas
 12 found in Oahu's waterways.
 13 All of these alien pests and their 20
 14 friends that come over every year are working their
 15 way into our native Hawaiian rain forests,
 16 displacing crucial endangered species habitats.
 17 Let's not forget that this is the rain forest that
 18 provides us with water to shower, flush our toilets
 19 and wash our dishes. Without this I doubt that
 20 visitors will want to visit anymore. If the
 21 waterfalls we all love dry up, they won't come here
 22 anymore.
 23 So it seems to me that if we are really
 24 concerned about the native Hawaiian culture and
 25 people, about keeping our visitors coming, keeping

See Response PH-1

1 our agriculture revenue from dropping and most of
 2 all keeping our natural Hawaiian forests from
 3 disappearing that we will do away with the idea of
 4 runway extension and international airport
 5 altogether.
 6 But the reason I'm here is not to
 7 represent the visitors, but to support the Hawaiian
 8 people who were here before this airport and its
 9 runway and to speak on behalf of the younger
 10 generations of this island. I was born and raised
 11 on Maui, and the most rich, beautiful, educational
 12 and phenomenal thing I had discovered here in my
 13 life is our native Hawaiian forests.
 14 Through my work I now have the great
 15 honor and privilege of being in these forests and
 16 helping to protect them. These forests and the
 17 right to enjoy them belongs to every child growing
 18 up on this island. The right to live belongs to
 19 every native plant, animal and insect in our
 20 forest. These rights should not be taken away
 21 because of greed and ignorance. I want these
 22 forests around for my children, and I'm sure you
 23 want them around for yours.
 24 It is for these reasons that the
 25 extension of the runway and the

1 internationalization of Kahului Airport would be a
 2 direct disrespect to the Hawaiian people, our
 3 lands, our unique way of life, and enough of this
 4 disrespect has been done. Let's put a stop to it
 5 right now. Mahalo.

6 Oh, and I'd like to add before I go that
 7 if someone could make sure before anyone spends any
 8 more money on the airport that maybe you could get
 9 some of the kids at Maui High School some screens
 10 for their classrooms, because when they burn the
 11 cane, the ashes drift into the classroom and fall
 12 on your paper and smudge it with black smudges.
 13 It's kind of a bummer after you work so hard. So
 14 maybe somebody could see that that gets done.

15 Thank you.

16 (Applause.)

17 MS. MARGO BERDESHERSKY: Good evening.
 18 I'm Margo Berdeshersky. Well, I'm very glad to see
 19 that the blue hats have not yet turned gold with
 20 grief. Maybe that's something for us to be
 21 grateful for. We've all been up past our bedtime
 22 here for many nights here, many nights, many years.

23 To the point, when was the last time that
 24 you were last caught in a Honolulu traffic jam? I
 25 was last evening on the outskirts of Lower Paia

See Response PH-13

See Response PH-19

1 traveling home from this very airport, idling my
 2 truck next to a hundred others polluting our home.
 3 Environmental impact, we're already on glitch
 4 (phonetic), and the runway is not yet one
 5 millimeter longer.

6 As to the deliberate lack of attention
 7 given to the impact over our national park, I can
 8 get a sunburn from a star that is a hell of a lot
 9 more than 20 miles away from this airport. The
 10 argument being promulgated is specious and
 11 short-sighted.

12 When was the last time you saw a drug
 13 deal transaction on the sidewalks of Wailuku? I
 14 did several nights ago, and those drugs arrived
 15 from somewhere that required our airport to get
 16 here. Honolulu, alas, is here, not there.

17 I teach in the Maui County schools. Last
 18 year I had the sadness of addressing Bloods and
 19 Cripps in my class. Those are not native species.

20 Impact: Are we deaf, dumb and blind?

21 Our local government has already clearly been
 22 impacted by the lobbying interests of those who do
 23 not care to maintain a small Hawaiian island. It
 24 has succumbed to pressure and to illusion.
 25 Progress is inevitable. Is not an axiom. It is an

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See Response PH-2

1 ax dangling over our community's neck, and we're
2 about to be murdered.

3 It may not be over until the fat lady
4 sings, but we can die from this overeating, and I
5 don't wish to see Maui perish. But without honest
6 and credible EIS we will not know what bit us or
7 what killed us. When was the last time you died
8 and didn't know it?

9 (Applause.)

10 MR. STEPHEN DITT: If you ask me to
11 summarize the sentiment of this public hearing here
12 tonight, it would be with due acknowledgement to
13 Greg Westcott. The whopper is a flopper.

14 My name is Stephen Ditt. I've lived on
15 Maui for over 23 years. I'm engaged in the
16 construction industry.

17 I would urge that the consultants return
18 to the drawing board and address the many concerns
19 that have been voiced here tonight at this forum.

20 One quick comment that I would direct to those who
21 still believe that a longer runway is needed for
22 safety reasons, may I submit to you that you could
23 always increase the length of the safety zones
24 which are located at each end of a runway. So to
25 those of you who want a longer runway primarily to

See Response PH-16

1 increase safety margins, may I again suggest to you
2 that you instead petition the FAA and the DOT to
3 increase the length of the runway safety zones
4 only, not the runway length.

5 Let's stop using safety as one of the
6 reasons to lengthen the runway at this airport. It
7 just isn't an issue. It is instead a smoke screen
8 planted by those who want a longer runway for other
9 unstated and self-serving reasons. Thank you.

10 MR. ROBERT COFFEY: Good evening. I'm
11 Robert Coffey representing the Sierra Club Hawaii
12 Chapter and more specifically the Maui Group.

13 In reviewing the draft environmental
14 impact statement before us here tonight, it's very
15 clear that in spite of its massive volume, this is

16 a very seriously broad document. To imply the
17 creation of a runway which can accommodate larger
18 international aircraft will have no impact on
19 Maui's physical environment is naive. To imply
20 that any impact that might result, especially those
21 having to do with Maui's greater exposure to
22 escaped alien species are insignificant or would
23 occur anyway is equally naive, if not cynical.

24 To dismiss Haleakala's National Park, one
25 of the world's premiere ecological resources as too

See Response PH-11
See Response PH-17

1 far away to be affected by any changes in airport
 2 size or use is unconscionable. It is quite
 3 apparent to any realist that the expansion proposed
 4 for Kahului Airport over the next 14 years is
 5 entirely premature.

6 Until the state can put an efficient
 7 monitoring system in place to detect and
 8 interrupt -- intercept the alien organisms,
 9 animals, plants and diseases at the Honolulu
 10 International Airport and demonstrate its
 11 effectiveness over the span of years, there should
 12 be no further discussion of expanding Kahului
 13 Airport on the pretense of public safety.

14 We don't need to bear the costs of
 15 agriculture blights, dangerous insects and animals
 16 and the introduction of diseases into our fertile
 17 island. If our leaders don't stand up and tell the
 18 truth about this airport's planned expansion, it is
 19 us, the citizens of Maui, and future generations
 20 who will be stuck with the bill for their short
 21 sightedness. Thank you all for coming tonight.

22 Stay active and vote.
 23 (Applause.)
 24 MR. LESLIE KULOLOIO: Dave and Ben are
 25 the directors to represent the two leading agencies

See Response PH-1

1 on this EIS. I need you to take your notes. I see
 2 you smiling, but I need you to address this to my
 3 associates.

4 I'm here to represent the federal
 5 facilities environmental restoration bylaw
 6 committee. We deal with the Department of Defense,
 7 and a large group throughout the United States
 8 trying to clean up the nuclear waste bases
 9 throughout the United States, Savannah, Georgia and
 10 Rocky Flats.

11 This committee is a federal-charted
 12 committee chaired by the U.S. Environmental
 13 Protection Agency. The committee's 50 members
 14 represent colors of people, Mexicans, Chicanos,
 15 indigenous peoples, those activists that fought
 16 hard to save our environment in the early 70s, and
 17 now thanks to President Clinton, President Dole or
 18 Ford or whoever they are, that we gonna try to
 19 implement this.

20 It said that Hawaii is far behind in
 21 taking care of business at home. So I'm gonna
 22 charge you today to send a report of the EIS to
 23 share with good men of the Department of Defense.
 24 I'll give you the number, to my good friends. They
 25 will represent me to review your report on the EIS

1 if it covers cultural concerns and the national
2 park crisis that you consider as a nonsupportive
3 party to this EIS. National parks have always
4 worked with us.

5 I'm gonna review the parties that have
6 been working with us to make it better where the
7 whole system doesn't work. We've come long and
8 hard as environmental justice activists throughout
9 the United States to make things happen, to bring
10 dialogue with all the federal agencies. Your
11 report did not include national parks. Why? Why?
12 It's a damn disgrace. We're working in Washington
13 to work together, and in Hawaii you, the FAA,
14 refuse to work with national parks. Our federal
15 facilities will hear from this.

16 I demand that you put the Environmental
17 Protection Agency -- call Browner and tell him
18 Uncle Leslie sent you this note. Please, please.
19 Please send them a copy Monday morning and to share
20 it with the good men of the defense department and
21 Fields who is our chairman for the Environmental
22 Federal Restoration Committee. Please.

23 Why? Because we handle all the crap that
24 the Navy and military did, and I read your EIS.
25 Your EIS says that the military will be using this

See Response PH-11

See Response PH-11

1 airport. Therefore, if it's federal funded and
2 they're coming to use the airport, I'm afraid. I'm
3 afraid. Army/Navy planes fly over the air.
4 They're carriers of everything above the sky and on
5 their ground.

6 This group that we work together is the
7 Department of Agriculture. Why you folks don't
8 work with them? Our membership is with the Defense
9 Department, Energy Department, the Department of
10 Interior, the National Oceanic and Atmospheric
11 Administration, the Agency of Toxic Substances and
12 Disease Registry, the state/tribal local
13 governments of Alaska, organizations, everybody,
14 the labor unions, the Sierra clubs.

15 In your EIS you forgot to ask. Why
16 didn't you include our Maui own U.S. customs and
17 Immigration Maui office to be part of your study or
18 comments to the problems of insects and bugs? Why
19 didn't you folks do that? You folks didn't include
20 that. They got the answers. Are you afraid of
21 something? Are you afraid of something, Dave?
22 Then why didn't you folks? I just got word that we
23 got the answers. Those things are coming in
24 without inspection.

25 We have three Canada flights everyday,

See Response PH-72

See Response PH-1

1 Air Canada, Canada 3,000, Aircraft Canada, and
2 guess what, they're empty going back home. The
3 pineapple can't fly back there. It's empty cargo.

4 Last of all, I say this is a federal
5 land. You mention that this is not city land? Are
6 you bowing your head? Are you sure? Then I
7 request as my committee that you do a title
8 research. You do a title clearance on all the
9 lands that you plan to acquire or on the beach that
10 was first taken over by the Naval facility where
11 you bought it, and I request that EIS did not prove
12 title to these lands.

13 You have read the papers. 28 million
14 dollars have now been taken away from native
15 Hawaiians, the harbors and all this. Was OHA
16 involved in this, Office of Hawaiian Affairs, "yes"
17 or "no"? Damn it again. Damn it again. That's
18 why I want that title research done.

19 All the reports you got in here, Dave,
20 Dan, is years of service. I read this page back
21 here, 30 years of service, 40 years of service.
22 It's time for retire. It's time for retire. You
23 folks are following the old gold system. It's time
24 for retire.

25 This EIS should have not even been put

See Response #23

1 out for the public to review. It's embarrassing.
2 It's the worst I've seen and, please, I've give you
3 the membership of our federal facilities
4 environmental restoration bylaw committee. Mahalo.
5 (Applause.)

6 MS. LUCIENNE DENAIE: How are you gonna
7 follow an act like that? My name is Lucienne
8 Denaie. I've lived here on Maui many years. I've
9 been involved in my own business all of that time,
10 and my business has always been dependent on the
11 tourist industry. And so, you know, I want to make
12 sure that we have a healthy economy here, but like
13 many of the other folks who have spoken here
14 tonight, the number-one thing about a healthy
15 economy is having a place that is beautiful and
16 having a place that is safe and having a place that
17 is healthy and having a place that is unique. And
18 Maui has had all these things, but we may not in
19 the future. And the only folks that would be to
20 blame would be all of us because we'll put up with
21 it being eroded away bit by bit.

22 You've heard from folks born and raised
23 here, and you've heard from folks who just, you
24 know, come here a short time. And all of us see
25 the same thing that, you know, we don't need

1 another Oahu. They already have all this stuff
 2 that's being promised. I heard this man say that,
 3 you know, that there's going to be no funds to
 4 address environmental concerns without that we
 5 expand our airport; without that we expand our
 6 economy. Well, they got all that in Oahu. They
 7 got no funds. They got budget problems. We have a
 8 balanced budget here on Maui. Maybe we're doing
 9 the right thing. Maybe we're heading in the right
 10 direction. I think we are.
 11 The visitors that I talk to, they want a
 12 quality experience. They don't want another
 13 plastic version of paradise, and we don't need to
 14 make bigger in order to make better, just like many
 15 folks here have said.
 16 I think that everything should be safe,
 17 and there have been many, many good suggestions
 18 offered here today about how the needs of lots of
 19 folks can be addressed, job safety, agriculture, et
 20 cetera, but this is not the solution. This is some
 21 way to get some federal funds while they're
 22 available and while the getting is good, and it's
 23 being pushed down our throats here in Maui. And
 24 it's obvious from what folks have said here tonight
 25 that we don't care for it.

See Response PH-2

1 So as far as I think, you know, the cost
 2 of any kind of economic improvement is not worth
 3 the cost of no increase in hotel tax or whatever if
 4 we lose one species of bird or tree or one crop.
 5 It's not worth it.
 6 And our leaders should be offering us the
 7 kind of solutions that don't force us into these
 8 hard places. And if they're not offering us these
 9 solutions, we should all be registering to vote and
 10 voting in some new leaders. Thank you.
 11 (Applause.)
 12 MR. GREGORY WILLSON: Hi. My name is
 13 Greg Willson, and I'm an environmental engineer.
 14 I'm speaking as a private citizen.
 15 I reviewed the EIS, and I find a lot of
 16 the similar discrepancies that everybody has talked
 17 about it. Basically I just want to bring up the
 18 right to the stars that haven't been addressed. A
 19 lot of cities have kind of a red glow around them
 20 you might have noticed, and in the EIS they said
 21 there will be no significant impact of the
 22 increased amount of the lights around the airport.
 23 I'm sure that, you know, with growth in
 24 this area we're gonna see a lot more lights and a
 25 lot less stars, and that's definitely something

See Response PH-2

1 that people come to see in Maui, and it would be
2 nice to have stars in this area. Thank you.

3 (Applause.)

4 MS. LAURIE CHANG: You guys gotta bear
5 with me. You can barely see me, but I can see you,
6 and I do have some things I want to say. I want to
7 first of all say how wonderful it was to walk down
8 here this evening and see so many of you because
9 last night a friend told me -- well, I asked him,
10 "Are you going to the hearing?" And he said, "No,
11 it's a done deal. Why go?"

12 So when I walked down here tonight, I
13 says, "My, God, two years, it's not a done deal.
14 People are still against this runway." And I tell
15 you, I was so happy, and I'm still enthused, and I
16 thank all of you for staying on to listen to the
17 last few of us.

18 But I'm especially pleased to see Mary
19 Evanson because Mary spoke about the inspection
20 they do outside this building. Well, let me tell
21 you, two years ago I went to the mainland, and I
22 decided on my way back I want to check the system.
23 I mean, everything that goes out gets checked,
24 right? They inspect it. How about things coming
25 in? We have the honor system, but do people really

See Response Pt-1

1 pay attention to the honor system?

2 So, anyway, day before I go to the
3 market, and I buy three turnip. Turnips, I love
4 turnips, and I make sure the top was cut, the
5 bottom was cut. I thought maybe that will pass.
6 You know, they don't allow these things, but maybe
7 this will pass.

8 Well, coming home I had to declare. I
9 decided, okay, I declared it. Do you know they
10 called me three times my name in the plane. When I
11 got out, there was a Phillipino man right there to
12 check me. I was amazed. I was amazed. So I said
13 to myself, "Now why don't they check everything
14 coming in?"

15 So I stopped at the screening, not the
16 one the agriculture, the last one before you board
17 the plane. I stopped there, and I asked them about
18 it. And their remark to me -- and I tell you was
19 sad -- was, "You know what? We've talked to our
20 supervisors. We've asked they, 'why don't we check
21 things coming in?' And you know what? It went to
22 deaf ears. They told us, 'We don't do it.'"

23 Now that's sad. If that's the way honor
24 system are gonna be with the people that we employ,
25 that's pretty bad. So if we're worrying about

1 foreign, you know, like species and things, we do
 2 have a problem because DOT, whoever it is or FAA,
 3 you're not doing your job. And you wonder why
 4 these people tonight are saying, "We don't accept
 5 this EIS." I don't either.

6 You know, there was a word in front it.
 7 It says, "draft" (swishhh), "EIS." That's what it
 8 was, draft, (swishhh). That's it.

9 So let's tell these people before we
 10 leave, "We're not for this runaway. Give us a
 11 better EIS. Prove yourself. Then maybe we'll
 12 believe you." So let's tell them tonight, "No."
 13 Come on, "No to this thing."

14 THE AUDIENCE: No.
 15 (Applause.)

16 MR, ED CHANG: In case you're wondering,
 17 that was my wife just before me. But through all
 18 of my years at work, 32 professional years, I've
 19 never seen -- thought that I would see two reports
 20 that I could rate the same as boo-boo 1A and
 21 boo-boo 1B.

22 The first report is -- either one, 1A or
 23 1B I'd rate this way. I would say that the biggest
 24 boo-boo that they made in this particular case is
 25 not addressing alien species.

See Response RH-1

1 The other report that I rate equal to
 2 this has to do with Honokahua where an
 3 archeologist's summary report basically said that
 4 there were no significant historical findings. And
 5 after they made some diggings and dug up only 50
 6 percent of the area they found 800 bodies that
 7 later they had to replace, and that's the same sort
 8 of rating I would give this report, not very good.

9 MR. DAN GRANTHAM: Thank you, Uncle
 10 Leslie. Sally said it in a nice way. You know,
 11 it's garbage.

12 I was just thinking the last time I was
 13 at a meeting that the DOT was involved, it was
 14 about the Pukalani bypass, and the question was how
 15 many accidents was it gonna take to put some
 16 traffic lights up there. I'm wondering how many
 17 accidents it's gonna take here.

18 You've heard a lot of good information.
 19 You've heard some answers. Steven gave you an
 20 answer on the safety issue. Doug MacCluer had a
 21 serious question about his pineapples. I think
 22 Mr. Shepherd gave him a wonderful answer. I'm
 23 familiar with the apple industry. They use it.
 24 They keep apples all year long this way.

25 But what I really want to talk about is

1 something that I haven't heard mentioned here yet,
 2 and I was speaking to the Center for Disease
 3 Control about this. We haven't actually touched on
 4 diseases, tropical diseases, and I don't have time
 5 to really go into, you know, everything from
 6 malaria to cholera, typhoid. I'm just going to
 7 mention one that was new to me, dengue fever.
 8 There's four different kinds of dengue
 9 fever. You can catch each one. It's carried by
 10 mosquitoes. We happen to have one of the
 11 mosquitoes all over the state. It's not the
 12 most -- or the strongest carrier. There is the Ae.
 13 aegypti right now in Kona and Molokai which is the
 14 carrier of choice of this virus.
 15 I have one report here from the National
 16 Center for Infectious Diseases saying, "Increased
 17 travel by airplane provides the ideal mechanism for
 18 transporting dengue viruses between population
 19 centers of the tropics, resulting in constant
 20 exchange of dengue viruses and other pathogens."
 21 I didn't even try to read the EIS. You
 22 know, I asked friends about it. I glanced cursory
 23 at it. I realized anything that had this kind of
 24 format of, you know, no significant impact was not
 25 worth reading. But they tell me that they could

See Response PH-1

1 find nothing in there to address disease control.
 2 You know, let me just ask you one
 3 question. What are you gonna do when somebody gets
 4 off the plane with Ebola? I mean, we're just
 5 asking this to be addressed, and the fact that this
 6 hasn't even been addressed is ridiculous. I mean,
 7 I don't know if you people here are responsible for
 8 the state of this report, but it's ridiculous. And
 9 somebody should, you know, bear some responsibility
 10 here before, you know, we have some more accidents.
 11 Thank you.
 12 (Applause.)
 13 MS. MARY GROODE: Aloha. I'm Mary
 14 Groode. I represent myself, my family, my friends
 15 that aren't here tonight, and I'm disappointed but
 16 I'm not surprised at the content of the EIS. I
 17 haven't read it, but I have heard the testimony
 18 tonight. And these other people have read it
 19 thoroughly, and the inadequacies are shameful.
 20 It's not that these are unusual opinions
 21 or issues or comments that haven't been brought up
 22 to be addressed before. They were all brought up
 23 to be addressed before, and they were completely
 24 ignored, and this is a travesty of the democratic
 25 process.

1 more fuel will end up in our oceans on the birthing
2 grounds of the whales if more and bigger airplanes
3 are invited to land here? Does the EIS talk about
4 the importance of fuel oil on the corral reefs and
5 the whales, the turtles?

6 There's more crime and more drugs than
7 ever. Every week in the newspaper there's so many
8 break-ins, and the tourists are not liking it here.

9 I do message at one of the big motels in
10 Wailea, and one by one they all tell me they don't
11 want to keep coming here if there's going to be
12 more traffic and more development. The reason they
13 like Maui is because it's Maui. It's not Honolulu.

14 There is no way that we will avoid being
15 international if they lengthen the runway. That is
16 the only way to slow down growth on Maui is to keep
17 the runway the length it is. Once it is longer we
18 will have no influence on how many jets land and
19 how many people they bring. It will not be within
20 our control at all anymore.

21 I appreciate Doug MacCluer and the other
22 people who have spoke. They have valid reason.
23 They want the economy to flourish. Although I have
24 to take concern with hearing that they're
25 environmentally concerned when the pineapple

See Response PH-2

See Response PH-4

1 industry petitioned and got permission to use DPCP
2 on Maui for ten years after it was deemed too
3 poisonous for the mainland. This was a drug that
4 caused environmental cancers, testicular cancers,
5 birth defects, and they allowed it on Maui for ten
6 years after it was already too dangerous to be used
7 anywhere else.

8 The lady from the tourism bureau said
9 that we need east coast, Europe and Asian markets.
10 The reason that our west-coast markets are
11 declining and return visitors aren't coming back is
12 that they have seen Maui go downhill. There's more
13 crime, traffic, murder and loss of the aloha
14 spirit, which is our true resource.

15 Someone else who was in favor of the
16 airport expansion, the runway expansion said, "The
17 EIS is in sync with tourism goals." It may be in
18 sync with tourism goals, but not with
19 responsibility to the environment or the people who
20 live here or the long-term environmental or
21 economic health of Maui.

22 MR. PAUL G. HUGEL: Aloha. My name is
23 Paul Hugel, and I am the principal investigator for
24 the Scientific Analysis and Visualization of the
25 Environment Program. We have a web server at the

See Response PH-26

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1 Maui High Performance Computing Center. We're
 2 actively involved in visualization technology to
 3 simplify environmental conservation efforts.
 4 In fact, I've been just given a little
 5 tip by a friend of mine. He said, "Try to keep it
 6 simple." To make a quick example, this is not
 7 simple. Now, for those people that can comprehend
 8 and can go through that and have the time and
 9 energy, this technology would have been appropriate
 10 20 years ago.

11 Now, to simplify this today, we have
 12 astronauts that train in virtual environments to do
 13 mission-critical-type maneuvers. We've had
 14 military personnel that also use virtual
 15 environment training technology to simplify a task
 16 before it happens.
 17 We currently have the technology today
 18 using computers and these new visualization
 19 technologies like virtual reality, and some
 20 examples of virtual reality which have been
 21 exhibited over here on the side.

22 I'd like to know if any of the current
 23 technologies have been utilized in order to
 24 simplify to the general public this document right
 25 here so that the average person could immerse

1 themselves in this completed plan. If it hasn't, I
 2 would like to propose that we do have the
 3 technology today to simplify this document right
 4 here so the average person can experience what it
 5 would be like before it was built so that we can
 6 all make an informed decision by experiencing what
 7 it would be like.

8 That's what we're doing at the Save Maui
 9 Program is helping conservation efforts by
 10 simplifying visualization, and I'd like to invite
 11 everyone to come and see some of the examples that
 12 we have here. Or if you have time later, come by
 13 at the Way Finders Cyber Cafe where we have our
 14 visualization laboratory.

15 For those of you that have Internet
 16 access, we have the world's most comprehensive
 17 three-dimensional model which is up 24 hours a day.
 18 We have about 1,400 people a month. And for those
 19 of you that have paper and pencil it's Internet
 20 address called HTTP://, and that's NKO.NHPCC.EDU.
 21 You can always get that from me later, or stop by
 22 Way Finders. And I want to thank you all for
 23 allowing me to come here and to exhibit some of
 24 today's current technology to simplify documents
 25 like this.

1 And I hope to pull together the funding
2 or to help stimulate the povers that be to create a
3 simplified model that we can all experience before
4 we possibly create an inappropriate scenario.

5 And I want to be unbiased on this and
6 suggest that we do have the technology today to
7 create a very simple immersive environment where we
8 can all make an informed decision as to whether
9 this proposed project should proceed or if we
10 should scrap it before we get over our heads and
11 create an inappropriate scenario for our future.

12 Thank you.

13 (Applause.)

14 MS. SHERRI CARDEN: Hello. Thank you
15 very much for this opportunity to speak. My name
16 is Sherri Carden. I'm from west Maui. I'm very
17 active in working with the children and serving on
18 various boards that keep in tune with our
19 environment. And I would just like to say that
20 this environmental impact statement is not only
21 lengthy, it's also used way too much paper, and
22 it's also grossly inadequate.

23 I am very ashamed that our governor is
24 supporting this and other things that take away
25 from the funding that helps our children. Our

1 children are our future, and I'm here on behalf of
2 them. And I'd also like to encourage all of you to
3 call our governor and tell him that you are ashamed
4 of this environmental impact statement.

5 I saw a piece on 60 minutes a couple of
6 years ago that addressed the impact of an
7 international airport in a community, and it
8 basically showed what London and Monte Carlo look
9 like. It is trash. It's wall-to-wall garbage
10 because these tourists come in, and they like the
11 cheap stuff. And they leave it everywhere, and
12 people don't want to go to these places. And it
13 said in the program that once you open up an area
14 into environmental places like this, you cannot
15 reverse it. You can't change it once that turns
16 around. You can't close the airport.

17 So I just want to address our quality of
18 life, and I really, truly appreciate all the
19 homework that all of you have done here. You've
20 all covered a different area and covered something
21 else that's very significant. It addresses our
22 quality of life and that of our children as well.

23 And I think that we have all showed that
24 we care, and it's very important that we do that
25 because ultimately the disparity between the rich

1 heard numerous testimony on the deleterious effects
 2 of alien species, and I'd just like to share it
 3 with you how real it is for me. When I was in high
 4 school we went up on a hike on the Waianae
 5 Mountains, and I saw these little tree snails. And
 6 I thought, "Wow, these are really neat." And I
 7 remember them, and my teacher told me, "Well, these
 8 are native, and they're only found here." I said,
 9 "Wow, neat." We went back three years later and
 10 they were gone. I saw -- I saw extinction occur in
 11 front of my face, and it really hurt. I don't want
 12 my children to go through it, nor do I want yours.

13 This draft EIS must be revised, and the
 14 appropriate experts must be consulted for adequate
 15 planning and proper public education. Thank you.

16 MR. CHRIS CARTER: Hi. My name is Chris
 17 Carter. There's a lot of things been said tonight,
 18 most of them to my way of thinking say that this
 19 EIS study is not really a study but somebody's
 20 concoction, and I agree with that.

21 I've been on this planet 46 years. I've
 22 seen about a third of it. What I've found here is
 23 unique in all the world, but this unique area can
 24 and will be spoiled beyond reclamation if we
 25 continue to ignore the problems caused by the

1 invasion of foreign species.

2 Has anyone here seen or heard of the
 3 No-see-um? It's a tiny flying insect which can
 4 pass through the screens on our doors and windows.
 5 They feed on blood like the mosquitos. I've been
 6 attacked by the No-see-um, and in less than a
 7 minute my ears resembled cauliflower and it really
 8 hurts.

9 In their own habitat, natural predators
 10 in the environment is what keeps their growth in
 11 check. But if such a species arrives here having
 12 no predators and a temperate climate, nothing would
 13 curb the population, and the problem would be even
 14 greater than the mosquito, the mosquito brought by
 15 Captain Cook and others.

16 I believe the same thing can be said of
 17 the Mediterranean fruit fly, the Alaskan mosquito
 18 which, by the way, can penetrate denim, Tanzy,
 19 which is a crop villain of every farmer east and
 20 west of the Rocky Mountains and, of course, the
 21 snakes. Here opening a container on a tarmac,
 22 exposed wind and few precautions, all the species
 23 just mentioned, plus many others can and will
 24 infest this beautiful paradise.

25 The rattle snake, which I am familiar

1 with, very familiar with, can cross an open field
 2 and be in the tall grass or the cane fields in a
 3 minute or two, and that cane field and the tall
 4 grass becomes their home and paradise is
 5 threatened.
 6 People won't be able to wear slippers
 7 anymore. It won't be safe. Children won't be able
 8 to walk along the road or near the fields anymore.
 9 This could be our fate. What keeps the snake
 10 population in check is in its natural habitat is
 11 the same as that of the No-see-um, but here in
 12 paradise of non-aggressive species, lack of.
 13 predators, a temperate climate, devastation will be
 14 total. Myconia is a prime example, and we are
 15 still trying to eradicate this species.
 16 And let me tell ya, if Tanzy comes to
 17 this island you'll never get rid of it. Other
 18 countries who care about their crops, the
 19 environment, have strict precautions in place to
 20 prevent scenarios previously stated from happening.
 21 Donald Reeser says Haleakala being 15 miles away is
 22 not protected from alien species. Neither is Iao
 23 Valley. Other countries who care, protect. How
 24 can we do less to protect paradise? In my opinion
 25 Oahu is paradise lost. Do we want the same here?

1 Thank you.
 2 (Applause.)
 3 MR. PHILIP THOMAS: Hi. My name is
 4 Philip Thomas, and I'm representing myself, and I'd
 5 like to think other people who think in Maui and
 6 around the world. I basically just have a partial
 7 checklist of things that so far I've found that
 8 seem to be grossly inadequate in this document. By
 9 this point most of them are redundant, but I'd like
 10 to bring them up anyway. So instead of calling it
 11 redundant, I'll call it a recap.
 12 One of the things is that the National
 13 Park Service offer should have been accepted to be
 14 a cooperating agency on this. The reasons for
 15 rejection of their offer are not based on reality.
 16 Basically, the National Park Service does have
 17 special expertise in the airport area, as they say
 18 we don't. Kathleen is basically one of those
 19 experts.
 20 And as for the bit about Haleakala being
 21 20 miles away and therefore remote from the
 22 airport, I don't think so. Africa and South
 23 America are not remote from Haleakala National
 24 Park. There are direct impacts from alien species
 25 from those places, and if those places are not

1 remote, do you think an airport that's 20 miles
 2 away is remote? I don't think so.
 3 so basically the alien species
 4 introduction has obviously not been addressed
 5 adequately. The inspection and quarantine
 6 facilities which don't really exist should be for
 7 passengers and cargo. There's no addressing of
 8 disease control. There's no adequate discussion of
 9 solid waste.
 10 Among other things, there's no plan
 11 outlined for recycling, only a vague mention that,
 12 yes, it will be there and, you know, as it's
 13 economically feasible. There's no discussion of --
 14 or inadequate discussion of runoff, particularly of
 15 solvents, both short-term and long-term effects.
 16 And also, for example, the pipeline in
 17 Kanahapine (phonetic), one of the last remaining
 18 refuges for the endangered Hawaiian birds.
 19 Wetlands impacts are basically ignored for the most
 20 part.
 21 And if, as this document states, that the
 22 Fish and Wildlife Service is the people that are
 23 responsible for endangered species, well, then why
 24 weren't they consulted? Quite frankly, that's not
 25 really the issue. Endangered species is one thing,

See Response PH-1
 See Response PH-27
 See Response PH-28
 See Response PH-29
 See Response PH-22

1 but native environmental doesn't have anything
 2 necessarily do with the Fish and Wildlife Service,
 3 and definitely the National Park Service is
 4 responsible for native environments.
 5 There's inadequate discussion of
 6 cumulative impacts for air, water, waste, visual,
 7 noise, jobs, et cetera. Cumulative impacts are
 8 just -- are not really discussed.
 9 There's misdirected use of statistical
 10 projections which could be a long discussion in
 11 itself. There's inadequate study and discussion of
 12 near-shore impacts and impacts on coastal-zone
 13 management areas, for example aquatic species,
 14 ambisic (phonetic) organisms susceptible to
 15 contaminants and/or sedimentation from runoff,
 16 inadequate discussion of emissions from plane
 17 traffic and additional rental cars, inadequate
 18 discussion of noise disturbance, increased
 19 frequency and expanded flight path.
 20 You know, depending on where you live, if
 21 you live in a, quote, "remote location from the
 22 airport," if in recent years you haven't noticed
 23 more flights over your house, then you live
 24 somewhere that I don't.
 25 Discussion of air-quality impacts are

See Response PH-30
 See Response PH-7
 See Response

PH-31

1 public for alien species, introduction management,
 2 desirability of Maui as a destination. Those
 3 things have been brought up this evening but not in
 4 the statement.

5 Promotion of the boom/bust cycle of
 6 construction work, if you have the airport here and
 7 they build some more, that's great. You got more
 8 people depending on these jobs. Then it gets
 9 finished, and where do those jobs go; conformance
 10 with community plans, inadequate discussion of the
 11 procedural problems and questions that have been
 12 raised.

13 And there are a number of things. For
 14 example, related projects for which impacts were
 15 not assessed because they're already finished,
 16 basically, drainage channels, road rerouting,
 17 expansion of rental car lots, construction of this
 18 terminal. The law states, as I understand it, that
 19 you can't ignore cumulative impacts of related
 20 projects. They have to be addressed in that
 21 document. These things are already done, and those
 22 impacts are not discussed.

23 Also there's inadequate discussion of
 24 internationalization. And, finally, they shouldn't
 25 have cut down that banyan tree to begin with.

See Response PH-2

See Response PH-11

See Response PH-4

1 inadequate, especially with regard to non-criteria
 2 pollutants, and the people who wrote that document
 3 should know what that means.

4 I didn't find anywhere the discussion of
 5 frequent inversions in the airport area, which is
 6 an atmospheric condition which acts as a holding
 7 tank for pollutants. Basically if you've ever
 8 looked at the west Maui mountains, chances are
 9 you've seen this cloud layer and the smoke coming
 10 up and staying right there. I guess what that is.
 11 That's the air that you breathe.

12 There's no -- let's see, there's
 13 inadequate discussion of medical facilities.
 14 There's no discussion of the difference between the
 15 no action and preferred action for water quality,
 16 water supply, and health care, alien species, et
 17 cetera. It simply states that, "Gee, these things
 18 are gonna happen anyhow." But how much difference
 19 is there gonna be with the proposed alternative as
 20 opposed to no action or any of the other
 21 alternatives?

22 Most of the testimony for expansion is
 23 short term regarding economic impact. There's no
 24 discussion of possible negative economic impacts
 25 such as losses of farm lands to pests, cost to

See Response PH-25

See Response PH-11

See Response PH-1

1 Thank you.

2 (Applause.)

3 MR. JACK THOMPSON: I'll keep this short

4 for you and for all of us. There are just three

5 things that I wanted to include in this report

6 today.

7 Much of my concern has to do with the

8 concentration of this study at the airport, the

9 immediate vicinity here. When almost every effect

10 of an international airport is going to be felt

11 island wide, traffic is a good example of that.

12 You do a good job describing how you will take care

13 of the traffic conditions and entering and exiting

14 the airport, but traffic is -- you don't talk about

15 the effect of the additional traffic in Kihei, in

16 Wailea and Kaanapali, Lahaina, et cetera, and that

17 needs to be addressed because we need to know how

18 you see that looking.

19 I was on the advisory committee to

20 develop highway plan, and we just completed the

21 master plan. And we just completed that about four

22 months, five months ago, and I believe that all of

23 the road plans that we developed did not consider

24 this -- what is going to happen as a result of

25 international growth, so you might look at that as

See Response PH-12

1 well.

2 We have a health crisis here on Maui.

3 The report points out that there's a critical

4 shortage of acute care beds. The occupancy rate is

5 generally over 90 percent. Visitors use

6 approximately 5 to 10 percent of the total number

7 of beds. This is a quote. "Several doctors and

8 hospital staff have indicated that the hospital

9 would have a difficult time handling a major

10 aircraft accident." Again I quote, "The proposed

11 airport improvements in and of themselves are not

12 expected to affect or be affected by existing or

13 planned health care services and facilities."

14 Then in identifying the impact that the

15 airport will have on Maui's health services is this

16 profound statement, quote, "No impacts would occur

17 if the proposed improvements resulted in no

18 additional demand on health-care facilities.

19 Therefore, no mitigation measure are warranted." I

20 had to tell you that because that just jumps out at

21 me.

22 And finally, if the goal for this runway

23 extension is not internationalization, then what is

24 it? To create jobs? The business of government is

25 to promote jobs, not to create them.

See Response PH-25

See Response PH-14

1 To convenience travelers? Studies have
 2 been reported by the DOT that showed changing
 3 airplanes is practically no factor with travelers.
 4 Is it to provide economic gain for
 5 airlines? Again, this is not government's job? Is
 6 it for safety? Every knowledgeable person knows
 7 this is no factor. To get pineapples to the
 8 mainland, the EIS says this could help, but there
 9 is no guarantee that it will.
 10 So if a longer runway is being built for
 11 any of the above reasons, there is obviously no
 12 need. Let's support all the other improvements
 13 planned at the airport and leave the runway alone.
 14 It's long enough. Thank you.

15 MR. GLENN SHEPARD: I presented this in
 16 this room May 18, 1992. I gave copies to -- I gave
 17 them to you because I don't have them.

18 Regarding this particular facet of "
 19 aircraft using the Kahului runway, Boeing says the
 20 777 can come here and leave easily fully loaded to
 21 as far away as Chicago, Japan, Tokyo, no problem.

22 I'm just a garden-variety geologist, and
 23 I got tangled up in some things here of opinions
 24 and loads and distances and things like that,
 25 and -- but I think there was enough in there to

See Response Pt-14

1 indicate that the different aircraft that are
 2 coming off of the line and starting to be used make
 3 any extension of the runway redundant. In other
 4 words, they can use this 7,200-foot runway going
 5 from as far as, say -- well, you can't see it.

6 Anyway, take a look at this one. There's
 7 New York. There's Honolulu, two different
 8 configurations of the aircraft make it such that
 9 they can get here from New York. We can do the
 10 same thing from Japan to Honolulu. They can do it.
 11 So why build a longer runway? If they built these
 12 aircraft to accommodate short -- the airfields all
 13 around the Pacific basin and around the world, what
 14 are we doing building a longer runway when you
 15 don't need it?

16 So, I will leave this, plus the other
 17 three documents that went with this with you, and
 18 you can chew on it, and you can put it in the final
 19 EIS, okay? Is that a deal?

(Applause.)

20
 21 MR. HUNTER: Okay, thank you all for
 22 coming. Thanks for all your comments and thanks
 23 for the cake. Make sure you get your parking
 24 validated before you leave. I want to thank you
 25 for being real considerate to everybody tonight.

1 And if you have any more comments, my name and
 2 address is on the agenda. Please send them to me
 3 by May 23rd. Thank you and good night.
 4 (End of Environmental Impact Statement
 5 Hearing at Kahului Airport, May 8, 1996.)

1 STATE OF HAWAII)
 2) SS.
 3 CITY AND COUNTY OF HONOLULU)
 4
 5 I, CINDY K. DENHOLM, do hereby certify;
 6 That on May 8, 1996, that the EIS Public
 7 Hearing was taken down by me in machine shorthand
 8 and was thereafter transcribed;
 9 That the foregoing represents to the best of
 10 my ability, a true and correct transcript of the
 11 proceedings had in the foregoing matter.
 12 I further certify that I am not attorney for
 13 any of the parties hereto, nor in any way concerned
 14 with the cause.
 15 DATED this 20th day of May 1996, in Honolulu,
 16 Hawaii.

Cindy K. Denholm
 CINDY K. DENHOLM, CSR, RPR

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

1/11/00
TO: THE FAA, 800 Independence Ave, SW, Wash, DC.
& THE STATE OF HAWAII DOT, AIRPORTS DIV. 96819-1890
RE: Public hearing on SDEIS, AH 1011-07 @ Kahului
Airport, gate 39, 8:00 PM, WED. 5/9/96

My name is Dave Chapman and I live on Maui.
With considerable effort I have reviewed the
Joint Draft E.I.S. and find that the negative impact & mitigation
of noise, fumes, and the increased risk for the introduction
of alien species has not been adequately
addressed. I find the traffic projections terrifying.

I believe that the growth proposals
in the Draft can have very negative effects
on our culture, our resident and visitor satisfaction,
our economy, and future jobs. Our beaches are
not growing!

Look at the advertising that is produced to
attract visitors. We know the pitch: -
uncrowded beaches - waterfalls -
pastoral lands - gentle people. What our
visitors want is what we want, a beautiful and
peaceful island.
Look at the political distortions (usually from
large landholder pressures) that have been
applied to our General Plan and to our
Community Plan citizen recommendations.

Look at Los Angeles!

I ask you to please leave the runways
on this wonderful island - alone.

COPIES TO FAA & STATE
- thank you,
DAVE CHAPMAN
808-661-8327
572-8328

1/11/00
TO: The FAA
800 INDEPENDENCE AVE, SW, WASH. DC.

RE: Public hearing on J.D.E.I.S. AH 1011-07
My name is Robert Chironomid and I live
on Maui.

I support the "No-Citizen"
alteration regarding runway length
ening and a parallel runway.
Thank you very much -
Robert Chironomid

See Response PH-22

See Response PH-1, PH-2
PH-7 and PH-31

See Response PH-2

TO: STATE DEPARTMENT OF TRANSPORTATION
AND FEDERAL AVIATION ADMINISTRATION

FROM: L. DOUGLAS MACCLUER

SUBJECT: KAHULUI AIRPORT EXPANSION

DATE: MAY 3, 1996

Good Evening,

My name is Douglas MacCluer. I am the Plantation Manager for Maui Pineapple Company, Ltd.. I own a family farm and have been farming on Maui for over 30 years. I am chairman of the Central Maui Soil and Water Conservation District, a member of the State Wapoint Source Pollution Committee, the State Water Commission Appurtenance Rights Committee and a member of the Nature Conservancy, amongst others.

I will speak on two subjects:

- 1.) Maui Pineapple Company
- 2.) Introduced Pest Species.

Pineapple

The pineapple industry has been reduced drastically; Maui Pineapple Company, Ltd. is the last canner and one of three fresh fruit pineapple shippers in the State. This reduction has caused the loss of open space, jobs and a reduction in a major industry to foreign competition. Presently, Maui Pineapple Company, Ltd. is struggling to survive in the canned and fresh fruit business. Because of strong committed ownership, primarily of old Hawaii families, a strong employee commitment and a drive towards innovation, the company continues to win the fight for survival.

Our Fresh Fruit business provides the finest quality of pineapple in the world and is an important part of our company; however, it is difficult to compete with foreign competition which pays much less for labor and has fewer social and transportation burdens. Our Fresh business, on Maui, cannot compete world wide with surface shipment as all surface shipments leaving Maui for the West Coast, so first to Honolulu then continue to the West Coast. Because of this Honolulu lay, a minimum of two to three days delay is imposed on our product. This delay with a perishable product results in serious quality problems when reaching the market place. We have been forced to discontinue surface

See Response #15

shipments, due to our inability to provide a quality product in a timely manner to our customers.

In spite of having a greater demand than supply, air shipment also has its problems. Frequently, the amount of freight that can be lifted off the short Kahului runway leaves up to 30 thousand pounds of fresh pineapple unshipped weekly due to runway limitations. Airplanes, when loaded with freight and passengers under certain wind conditions, do not have the ability to deliver our product to our West Coast markets.

Without the fresh fruit business it may be difficult for Maui Pineapple Company, Ltd. to retain its strength and viability in the market place. The Company has suffered major financial losses in the last 3 years.

Environmental Concerns

I am an environmentalist. I am also the administrator of the Puu Kukui Preserve, which is the largest Private Natural Area Reserve on Maui. I have seen problems with introduced species lately. We have seen the Two Spotted Leaf Hopper, which is killing Uluhe in the native forest and destroying some watersheds, making them prone to erosion. We farmers have been faced with the imported Diamondback Moth, which destroys cole crops. The Lesser Cornstalk Borer is causing havoc to the sugar cane, the Yellow Sugarcane Aphid is ruining pastures in an already fragile cattle business. The Silver Leaf Whitefly is transmitting silver leaf virus to many different plants; while another imported virus causes Tomato Spotted Wilt. There are many other imported species that may become a problem. It is imperative, for the Island of Maui, that the Environmental Impact Statement and the future Maui Airport include adequate protection from imported alien species. Maui cannot afford to be destroyed by new plant diseases, insects or animals like the Brown Tree Snake.

See Response #15

I do not feel, however, that lengthening of the runway alone will have a major effect on imported species. In my opinion, most introduced species are coming from freight and imported food. We do need to address this problem.

I am on the advisory committee to mediate PUEO vs those opposed to the runway expansion. The one thing we do all agree on is that we must provide funds and resources to address the alien species issue.

Thank You for your time.
Lcmb

TESTIMONY

OF:
CHARLES KALUWEHI MAXWELL SR.
HAWAIIAN CULTURAL SPECIALIST
PUKALANI MAUI HAWAII
96768

MEMBERS OF THIS HEARING COMMITTEE, I WOULD LIKE TO THANK YOU FOR GIVING ME THE OPPORTUNITY TO TESTIFY ON THIS VERY IMPORTANT SUBJECT, THE LENGTHENING OF THE KAHULUI AIRPORT RUNWAY.

I WAS BORN IN NAPILI MAUI AND HAVE LIVED ALL OF MY LIFE HERE AND HAVE SEEN THE CHANGES THAT OCCURRED OVER THE YEARS. I CAN REMEMBER THE POPULATION OF MAUI TO BE ABOUT 30 THOUSAND PLUS UNTIL WE BECAME A STATE AND ALL HELL BROKE LOOSE. WE ARE PRESENTLY OVER 100 THOUSAND PEOPLE AND THERE ARE MANY OF US WHO MISS THE MAUI WE ONCE HAD.

ALREADY OUR HIGHWAYS ARE OVERBURDENED WITH CARS AND DURING THE MORNING AND EVENING PEAK TRAFFIC PERIODS, MANY PLACES ARE GRID LOCKED. FROM IIANA TO LAHAINA, NO ONE IS SAFE FROM THIS MODERN PHENOMENON. THE ENVIRONMENTAL IMPACT STATEMENT FAILS TO ADEQUATELY ADDRESS THE TRAFFIC PROBLEM OUTSIDE OF THE AIRPORT PROPER. EVEN A LAY PERSON LIKE MYSELF REALIZE THAT TRAFFIC CREATED BY THIS EXPANSION AFFECTS THE ENTIRE ISLAND BECAUSE CARS WILL NOT BE DRIVEN IN A CIRCLE JUST AROUND THE AIRPORT.

ANOTHER PROBLEM THE E.I.S. STATEMENT FAILS TO ADDRESS IS THE FACT THAT BY LENGTHENING THE RUNWAY, INTERNATIONALIZATION WILL OCCUR AND THIS MIGHT BE THE MOST IMPORTANT REASON WHY THIS SHOULD NOT HAPPEN. MAUI HAS VERY RARE AND

See Response PH-2

See Response PH-2

1

ENDANGERED FAUNA AND FLORA. OTHER PEOPLE WHO ARE TESTIFYING TODAY WILL SPEAK ON THESE ENDANGERED SPECIES.

THE KAHULUI AIRPORT IS SURROUNDED BY PRIME AGRICULTURAL LANDS AND A VERY LARGE WETLAND ON THE MAUKA SIDE OF THE AIRPORT. UNLIKE THE REEF RUNWAY WHICH IS ALL PAVED AND KONA AIRPORT WHICH IS SURROUNDED BY LAVA, KAHULUI AIRPORT IS UNIQUE. ANYTHING THAT DROPS FROM THE AIRPLANES LANDING GEAR, OR HIGH HIKES IN CARGO, WILL BE ABLE TO ESTABLISH ITS SELF HERE BEFORE IT'S EVEN DETECTED AND THAT WILL BE TOO LATE.

ANOTHER FACTOR THAT HAS NOT BEEN ANALYZED IN THE STUDY WAS THE EFFECT THE EXTENSION HAS ON THE KANAKA MAOLI OF MAUI. EVERY TIME SOMETHING IS BUILT ON MAUI FROM HOTELS, TO CONDO'S, TO GOLF COURSES TO RUNWAY EXTENSIONS, THE NATIVE PEOPLE SUFFER. BY ALLOWING THE RUNWAY TO BE EXTENDED, MORE PEOPLE ARE BROUGHT IN, MORE INFRASTRUCTURE HAS TO BE BUILT, MORE LUXURY HOUSES ARE BUILT TO MEET THE DEMAND AND GUESS WHAT? SOME NATIVE HAWAIIANS GET TO CONSTRUCT THE RUNWAY AND ITS FACILITIES AND ARE EMPLOYED AT MENIAL JOBS THAT IS CREATED BY THIS "NEW BUSINESS." HOWEVER THE LARGE LAND OWNERS AND OUT OF STATE AND FOREIGN INVESTORS ARE THE ONES WHO WILL PROSPER BY THIS EXPANSION.

THE KANAKA MAOLI WILL LOOSE OUT WITH (ENCROACHMENT OF THEIR LIFESTYLE), FURTHER DISPLACEMENT FROM THEIR LAND AND THE DISREGARD OF THEIR SPIRITUAL AND CULTURAL VALUES.

See Response PH-1

See Response PH-2 and PH-13

2

THE FACT OF THE MATTER IS THAT MAUI HAS AN APPEAL BUT WE ARE SLOWLY LOOSING IT. ALREADY WITH ALL THE CONVENIENCE STORES AND (MAINLAND LOOKING) SHOPPING CENTERS, WE LOOK LIKE SOUTHERN CALIFORNIA. SOMETIMES, YOU CAN'T TELL IF YOUR IN HAWAII BECAUSE THERE IS HARDLY A VISIBLE SIGN OF AUTHENTIC HAWAIIAN CULTURE.

IF THE EXTENSION IS ALLOWED TO TAKE PLACE, THEN THIS FACT ALONE WOULD BE THE STRAW THAT BREAKS THE PROVERBIAL CAMELS BACK. OUR MAYOR AND THE HOTEL AND CONSTRUCTION INDUSTRIES ARE PUSHING FOR EXPANSION OF THE RUNWAY FOR SHORT TERM ECONOMIC GAINS. BUT THE INNOCENT ONES, THE FUTURE GENERATION, WILL FEEL THE FULL WRATH OF WHAT WE CREATE TODAY. THEY ARE THE ONES THAT HAVE TO LIVE WITH OUR MISTAKES AND THIS WILL BE THE BIGGEST MISTAKE IN THE HISTORY OF MAUI.

TESTIMONY - AIRPORT MEETING

5/8/96

Jack Thompson

First an observation. For anyone to be expected to digest this 5 volume-22 lb. conglomerate in this short of time is totally unrealistic. I'm sure it's safe to say that any testimony tonight is based upon surface observations and the testifier has done little more than skim the issues. I would hope there will be other meetings to discuss this EIS at a time much later so all of us can get into it in more depth.

I find some inadequacies in this report. Some are omissions, some are contradictory, some conclusions are based upon poor assumptions and most of the material leans heavily towards justifying runway lengthening. All of these things should not exist in a STUDY. A study is supposed to be neutral and objective. That is not the case here.

Omissions: Safety has always been used as a lengthening argument by those who can think of no other reasons. All of us who have paid attention to previous meetings know that safety is not an issue because Kahului is safe for the airplanes currently using it. This according to the FAA, DOT and representatives from the Pilots' Assoc. This EIS should have taken the time to dispel the safety myth as a public service - it does not do that.

Though the EIS claims a parallel runway is way off in the second phase, the people to be effected by it have the right to know it. This report, however, merely says some East Spreckelsville residents will be displaced. Doesn't the state have a moral obligation to identify who those residents are? When displacement is expected to happen? What the legal process is?

Contradictory: Section E, page xi tells us to subtract the numbers in Exhibit ES-A from those in ES-B to compute the effects (on number of visitors) of international flights. One difference is 269,190 visitors. And yet, throughout the report, the writers would have us believe international status would have no effect on visitor numbers.

Deceptive: Section E page xiii says international plus improvements will create 280 jobs. The runway lengthening has almost nothing to do with job creation because jobs related to internationalization are specialized federal jobs (immigration, customs, drug policing, etc.) The bulk of the jobs will be created by all the other improvements at the airport. There is no objection to building better facilities.

See Response PH-16

See Response PH-2

See Response PH-4

We don't need the runway.

False assumptions: "Internationalization.... would not generate enough foreign visitors to Maui to warrant attention in this analysis." How in the world can that statement be made when one looks at the history of Maui's visitor growth. Growth, as we know it, started when airplanes took over from ships as the means to visit Hawaii. Increased flights allowed more visitors to come resulting in more residents. Internationalization will bring more people in more airplanes from more global areas.

Much is made throughout this document that international means Japan. The study bases its visitor assumptions on Japan being the only country who will take advantage of direct flights. This is shoddy guesswork. We already have regular Canadian flights. Germany, France and Spain have discovered Maui because of our windsurf qualities. Can it be long before there are direct flights from those countries as well?

Much of my concern has to do with the concentration of this study to the immediate vicinity of the airport. Almost every effect of an international airport involves the entire island. We can talk about new access roads feeding into and out of the airport relieving the expected congestion. We do not talk about the airport-generated traffic and its effect on Wailea, Kihei, Lahaina and Kaanapali.

The EIS, time and again, says the key to controlling visitors is in the number of hotel rooms we have available and, it says, visitor counts will only rise if the county gives permission for more hotel construction. The stated reason for more airplanes and internationalization is because of anticipated demand. Does anyone doubt that that will happen? So, here we are today giving in to that demand.

With more visitors comes more residents, otherwise, who will provide the services for these visitors. Where will they live? What will housing demand do to property values? Do we become an island of duplexes, apartments, condos and shared living?

Maui currently has a health care crises. The report points out a critical shortage of acute care beds. The occupancy rate is generally over 90%. Visitors use approximately 5 to 10% of the total number

See Response PH-25

See Response PH-25

of beds. "Several doctors and hospital staff have indicated that the hospital would have difficulty handling a major aircraft accident."
"The proposed airport improvements in and of themselves are not expected to affect or be affected by existing or planned health care services and facilities." Then, in identifying the impact the airport will have on Maui's health services, this profound statement is made, "No impacts would occur if the proposed improvements resulted in no additional demand on health care facilities." Then the final statement, "Therefore, mitigation measures are not warranted."

The invasion of alien pests has been well covered tonight. But, again, the report's concentration is at the airport but the pest concerns are island-wide. Remember, the brown tree snake entered some port on Guam from Australia. It now over-runs the island and no control is in sight. The EIS recognizes the seriousness of this problem but offers no solutions except to continue study.

Finally, if the goal for this runway extension is NOT international - ization, then what is it? To create jobs? The business of government is to promote jobs, not create them. To convenience travelers? Studies have been reported by DOT that show changing airplanes is practically no factor with travelers. Is it to provide economic gain for the airlines? Again, this is not government's job. Is it for safety? Every knowledgeable person knows that this is no factor. To get pineapples to the mainland? The EIS says this could help but there is no guarantee that it will.

So, if a longer runway is being built for any of the above reasons there is obviously no need. Let's support all the other improvements planned at the airport and leave the runway alone. It's long enough.

See Response PH-25

See Response PH-25

See Response PH-25

ATTENDANCE SHEET

Page 2 of

Subject: KAHULUI AIRPORT DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC HEARING
 Place: Kahului Airport, Gate 39
 Date: May 8, 1996 Time: 7:00 p.m.

Please Print

No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	JEFFREY PARKER	TROPICAL ORCHID FARM	P.O. BOX 170 HAIKU, HI. 96708	572-8569
	Lori Ballance	Gatzert, Hissner & Dillon	Carlsbad, CA 92008	(619) 431-9501
	JIM SHEETS	MHA	410 NAPII: KAI BEACH CLUB LAHAINA, HI 96761	
	DAVE CHENOWETH	SELF	340 FRONT ST. LAHAINA HI.	661-8327
	<i>Robert Chenoweth</i>	SELF	340 Front St. Lahaina HI 96761	661-8327
	<i>J. W. Lutz</i>	SELF	P.O. Box 525 Kihikihi HI	N/A
	Dale Isenburg	Carpenters	102 A EICU PL Kihikihi HI 96753	874-8155
	Marilyn EVANSON	SELF	Box 624 HAWAIIAN 96765	378-9714
	Karen Andoin		223 Ulukani Road, Kula	876-0615
	<i>Douglas P. CERVEL</i>	<i>Carpenters Union Local 745</i>		

ATTENDANCE SHEET

Page 1 of 21

Subject: KAHULUI AIRPORT DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC HEARING
 Place: Kahului Airport, Gate 39
 Date: May 8, 1996 Time: 7:00 p.m.

Please Print

No.	Name	Organization	Address, City, State, Zip Code	Phone No.
1	Tom CANWON		720 AWALAU RD. HA'IKU	572-4644
2	Celeste King	Maui Nu Ka'oi	1061 Kukuna Rd., HA'IKU	575-2124
3	Isaac HAM	MMP	2007 HIGH STREET WAILUKU	244-5011
4	Dana Naone Hall	" "	" "	" "
5	Nicole Waithall	National Parks & Conservation Assoc.	123 TOWNSEND ST. SF, CA 94107	415- 536-1992
6	BILL GEORGE	SELF	2773 KAMELANI LOOP PUKUKANI, HI 96768	572-9545
7	Don Reeser	National Park Service Haleakala N.P.	P.O. Box 369 Makawao, HI	572-9206
8	LISA HAMILTON		BR BOX 190, HANA	248-8001
9	MARSHA WIENERT	MAUI VISITORS BUREAU	1727 W.I. PA LOOP WAILUKU HI	244-3530
10	Cynthia Herberg	Kaunapali Beach Resort Assoc.	45 Kai Ala Dr. 96761 Lahaina HI	661-3274

DOCUMENT CAPTURED AS RECEIVED

ATTENDANCE SHEET

Page 4 of

Subject: KAHULUI AIRPORT DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC HEARING
 Place: Kahului Airport, Gate 39
 Date: May 8, 1996 Time: 7:00 p.m.

Please Print

No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Dina Sullivan	self	P.O. Box 131 PAIA HI 96779	242-2474
	Martin Lopez	CARPENTERS	163 Aliolani St. Pukalani	
	Avelino O. Tacaog	Carpenters	704 Komo Place, Kah.	
	Renate Gersmann-Duvall	self	534 Olinda Rd. Makawao	572-1584
	MIKE GUEST	CHOPENTER	2065 KAMEST. #C	873-0625
	LARRY FEINBERG	FATHER	305 Aliolani	
	Jack Thompson	Spreckelsville Comm. Assoc.	204 Kaulakai Pl. Paia 96779	877-5749
	Jay L. Mitchell	self	300 S. PU'UENE AVE. KAHULUI	
	Patricia Tummons	self	197-C HOKULANI ST HILO HI 96720	
	Anna Sheehan	self	105 JOJO PL. KULA HI	878-2977

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Andrey M. Garcia	MAUI TOMORROW	P.O. Box 1153 Makawao	572-9874
	Stun Mosee		1835 MILL ST WAILUKU	524-3782
	Orliff B. Hughes		158 Haulani St. Pukalani	572-8864
	Steve Sneyt	Carpenters Union Local 745		242-8827
	Ernesto Costa	CARPENTERS UNION LOCAL 745		
	DAU JUDSON	SELF	P.O. BOX 115 Makawao	572-0835
	Christina	Carpenter	115 Hoanna St. Wailuku	244-8441
	Ely Alupay	CAWENTER	841 Olenast. Wailuku	242-0945
	K. Buzza		P.O. Box 871-K. Li	
	Doug MacKuer	Maui Pine	870 HOLIMOLE RD MAKAWAO	572-7211

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Subject: KAHULUI AIRPORT DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC HEARING
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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Judy Squires	Public Educ.	P.O. BOX 566 Kula, HI 96790	878-6278
	DEE-DE			572-7727
	Brian Husc	NPCA	P.O. BOX 1289 OAKLAND, CA 94604	512 929-9922
	Sally Raisbeck		427 Liholiho St Wailuku	244-9604
	Dick Fields	LK+PRR	975 LIMAHANA PL LAHAINA	667-6851
	MARTIN GARELICK	L.K.+P.R.R.	975 LIMAHANA PL LAHAINA	667-6851
	MARK KIYABU	INDEPEND	412 ONE ST. KAHULUI	477-9226
	Bill Evanson	SELF	PO Box 694, Makawao, HI 96768	572-9435
	SHARON RINGSVEN	self	PUB 1122 Kula HI 96790	572-9306
	JUDY K. SHIMIZONO	AMPAC	2630 KEKAI DR LAHAINA	667-4126

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	ROBERT MUNDEN	COUNTY COUNCIL	RR 2 BOX 80 KULA, HI 96790	243-7104
	DAVID SWANG	DAVID SWANG GOLF	841 ALINA ST. WAILUKU	242-7716
	FRANK SANFEL	KEAHOLE ASSOC	P.O. BOX 3131 KAILUA-KONA, HI 96740	329-2261
	Greg WESTRATT	M.M.P.	Box 485 Hilo	572-1607
	Bren Bailey	self	RR 2 BOX 186 Kula HI 96790	878-2668
	Shirley/Helen Shepherd	self	477 S. Alie, Wailuku	244-7224
	ROBYN TERRY DOWNER	LAHAINA	505 FRONT ST. #129 LAHAINA	667-2712
	Christine Kafa	self	P.O. BOX 906, Hilo	572-5038
	Marshall Loope			
	Lloyd Loope	Natural Biological Services	P.O. Box 369	572-9306

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	GLENN L. SHEPHERD	—	477 So. Ala Rd. WAILUKU, HI 96793	244-7224
	Emmanuel Angul	Renaissance Waik.	3414 Akule Dr. KIHUI, HI 96753	879-3732
	PATRICK EVANS		KAH MAUI HI 96732	
	Bill Smith		P.O. Box 927 Waikoloa HI 96793	886-776
	Judi Walsh	FAA/Maui ATCT	Kahului Airport Kahului, HI 96732	877-0725
	ROBERT PARSONS	-INDIVIDUAL-	959 HANA HWY HAIKU HI 96708	572-1756
	PATRICK RYAN	MAUI CHAMBER	250 ALAMAHA # N 16A KAHULUI 96732	871-7711
	FRANK M. KAHI	HAUI HI	2780 COLUMBIA ST Kahului HI 96732	572-2525
	JOHN M. PERRY	—	265 Kaupua St. MAKAWAO, HI 96768	572-9836
	JERRY EDWARDS	Individual	235 Waikeolu WAILUKU 96793	242-0981

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	BUCK DUCHANAU	SELF	416 ALU ST., LAHAINA 96761	661-9044
	Mitch Kitz		140 Uwape Rd 40-102 KIHUI 96753	875-2114
	PETER KAFKA	SELF	1150 NAUHOLOU PI., HAIKU HI 96708	572-8891
	Annie Kemper	SELF	1539 Helamuc St Kihui	879-4682
	Joseph Woloztynick	Corp Counsel County of Maui	200 S. High St, Wailuku	243-7740
	Ron Proza de Yuen	self	P.O. Box 1147 Haiku, 96708	572-3768
	Andris Yver	self	P.O. Box 1147 Haiku, 96708	572-3768
	CHRIS CARTER	SELF	505A KAI AULU LP MAKAWAO	573-0143
	ERIC KANE	MAKAPUNANA	P.O. Box 742 HAIKU, HI	572-9047
	HELEN HOOPAI	KUPUNA	P.O. Box 1437 PAHA MAUI	

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	MAMORU HAMASAKI	Retired SENATOR	PO Box 1516 KAHULUI HI	877-6333
	DICK MAYER	SELF	RR1 BOX 518 KULA	878-1874
	Todd Hondo	KRAHUMANU Center	275 W. KAHUMANU AVE.	877-3369
	Lucy Lemberg		4855 Kihikihi RD	879-2267
	Randall Moore	HCEES	PO Box 297, Paunahou, HI	877-6968
	Edy Clate	Self	Box 11634 LAHAINA	661-5058
	Honolulu Seaside	Hawaii Wildlife Fund	PO Box 5361 Lihoune	667-8437 667-2452
	James P. Rust	Pure Coalition	P.O. Box 651 Kula, HI 96790	244-8625
	Ellen Levinsky	individual	PO Box 1666 Lahaina HI	661-8410

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Doug Sheehan		105 Ioio Pl. Kula 96790	878-2977
	Mazako Westcott		PO Box 487 Haila 96790	
	Fern Duvall &		534 Olinda Rd. Makawao 96768	572-1584
	Charles Kokes	self	P.O. Box 49, Paia 96779	579-9119
	CATHLEEN HODGES		PO Box 6 MAKAUO 96768	572-2689
	MELISSA PRINCE		P.O.B. 650 HAIKU 96790	572-1867
	CRAIG NALETTE	SELF	3701 HONOAPILANA #205 LAHAINA 9674	669-0564
	Suzi Katz	self	140 Uwepo Rd 40-102 Kihikihi 96753	875-2164
	Donna Edwards	Self	1150 Nanihoku Pl.	572-8891
	Ielani Brmsm	Self	POB 1203 Wailuku, HI	8713119

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Scott Bonumhealani	UNITED AIRLINES	Kahului Airport Kahului, HI 96752	871-8532
	Gloria Kraftsow	self	1040 East Kuaoha Rd. Houka, HI. 96708	572-9336
	Brian Perry	Molokai News	120 Mokuia Pl	242-6340
	William Watson	N/A		244-6039
	Stephanie Joe	RCUH	RRI Box 433A Kula, HI 96790	572-9306
	Estrella T. McKuen	self	1132 Aala Place Makawao HI 96768	573-0057
	Suki Christenson	self	296 Poho Pl Kaanu, HI. 96779	577-9703
	KAMA TENGAN	HAWAIIAN ISLAND TERRITORY	WAILUKU	NONE
	Manuel M. Kuloio	SELF	Kahului	871-4001
	John Titmer	SELF	29 Mokuia Pl. PO Box 907A	871-9421

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Amy Kubota	Stm-Burkeston	132 N. Church St. Waikeke	254-3209
	WAYNE N. HEDANI	KAPALUA LAND CO. LTD	1000 Kapalua Dr. Kapalua 96761	667-5433
	Margit Tolman	Huohupa Haven Vacation Serv.	42A Talaalani Av. Paia 96779	579-8292
	Balman & RJ Woods		461 Lanika Ave. HI 96779	871-4633
	Charles Fein	KC Environmental	P.O. BOX 1208 MAKAWAO HI 96768	573-1103
	Kirsten Fein	KC Environmental	PO 1208, Makawao 96768	
	Mrs. U. Wain	Chamberlain	30 Lono Ave Suite 400 Paia HI 96732	877-5710
	PATRICK K. MIYAHARA	ASTAN, TSUTSUMI & ASSOC.	1871 WILI PA WOP SUITE A WAILUKU	244-8044
	Kelly Arbor	Lahaina News	PO Box 910-A Hanalei, HI	667-7866
	J Plumm	indiv.	PO Box 990 Hanalei HI	

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	ROGELIO HIDALGO	K-T. Pamela Eng'rs	871 KOLU ST., Ste 201 Wailuku HI	282-6861
	ALBERT MAKI	" "	" "	" "
	MARC DREHSEN	self	PO Box 826 Kihui, HI 96753	874-8124
	Dana Medeiros	ATA	P.O. Box 35103 Kahului, HI 96753	871-6285
	Skippy Hau		40 Kapi Lane #104	244-3894
	Pamela B. Shutt		212 Ohu Ki Rd., Kihui	844-0144
	Joy Medeiros	UNITED Airlines UAL	11 Honani St. Kihui	874-9232
	TED KRAFTSON	PERSONAL	1040 E. KUIAHA RD. HAIKU, HI. 96708	572-9336
	BUCK JOHNSON	self	3443 main rd Kihui	874-8422
	Hina Kreutzfeld	self	150 Aliiolani Pukalani HI 96768	573-0573

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Michele Chouteau	County Council	200 S. High Street Wailuku	243-7038
	Nargo Berdeshevsky	Citizen	521 Back 106, Haiku 96708	572-7882
	Tom STEVENS	JOURNALIST	17 PAINTVA ST. Haliimaile	572-0553
	Doris S. Ackerman	Resident of Sparksville - for retirement purposes		877-2127
	Robert Coffey	Sierra Club	P.O. Box 2000 Kahului HI	244-9571
	Eva Tantillo	Mauie Big Assoc	2828 Umaka Place, Kihui, HI.	96979-9103
	Terry Toliman		PO Box 1220 Paia HI 96779	579-9658
	Richard N. Emery	Mauie Tomorrow	28 Nonohe Pl. Paia HI 96779	871-9421
	DAVID W BOTHA	Koolau AVIATION INC	11 LINCOLN DR. DUKAUNE 96768	572-1942
	SCOT JENSEN	SIERRA CLUB	P.O. BOX 105 KAHUI WAILUKU, HI 96793	874-6190

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Place: Kahului Airport, Gate 39

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	TAMARA PERKINS		1135 MAKAWAO AVE #103-107 MAKAWAO HI 96748	572-3651
	Erik Bernard		388 Hapapa Rd. Kula, HI 96791	878-1827
	Laurie Chang		4800 Makana Alanui 96753	874-6475
	Ed Chang		4900 " " " "	" "
	Don Grantham		SR1 BOX 47 Haiku 96708	572-8331
	John Judy		120 AKA PL KULIHA	96790
	Robert McCarty		1550A NAKA PL WAI	96793
	MARY GROODE		P.O. Box 1550 KIHAI, HI 96753	96753
	Jane Thompson		204 Kealakai Pl. Paia	877-5749
	Paul G. Angel	S.A.V.E. Maui	550 Lipoa Parkway MHPCC	

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Jason Koga	DOT-A	Kahului Airport, Kahului, HI 96732	872-3851 88
	NORMAN SHAW	Q PACIFIC	P.O. Box 30081 Kahului	877-2785
	PATRICK MINFORD	CONCERNED CITIZEN	1167 W. KUIATA RD. HAIKU, HI 96708	575-9452
	Philip Thomas	"	P.O. Box 1272 PAUNENE HI 96784	572-9306 +3233
	Wendie Jee	Fr Canada	444 Airport Terminal Bldg 16 HI 96819	836-8509
	Gail Pickholtz	concerned citizen	P.O. Box 675 Haiku	572-1446
	LYONS K NAONE	U.S. CUSTOMS	KAH A/P	877-6015
	LUCYNE DENAE	SIBERA CLUB	SR1 BOX 47. HAIKU, HI 96708	572-8331
	TED YAMAMOTO	Governor's office	2204 Ojima St WAILUKU	243-5296
	Peter Sisco	FARMER	111 Kolomaha Pl. Kula	878-49

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	DAVID HAAKE		15 Kulanihakoi St 14E 96753	879 1158
	Grace Haake		15 Kulanihakoi St 14E 96753	879 1158
	David Speer		2585 Lemi Place, Hauku 96708	575-8244
	FRED HAYWOOD	PAIA MAIN ST.	303-B PAANI PL PAIA	877-1504
	MIKE WHITE	HOUSE ON REAR	STATE CAPITOL HALL.	576-6790
	Dina Dahl	Hong Kong Farmers	2441 Liliu Rd, Hahaione, HI	572-1804
	LISA SKEELS		679 S. Kula Rd. Kula	-
	FIONA LEIGH		303 Paani Pl Paia HI 96741	871-6898
	Sherry Card	Eco. Director	PO Box 102 Lahaina	662-4743
	Pauline Chaplin		480 Kuli Rd. Kula	879-1756

Subject: KAHULUI AIRPORT DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC HEARING
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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Stephen Pitt	Mauai Air Traffic Assn	PO Box 100 PAIA HAWAII	871-5589
	A. Kulobio	FFEMDC	469 MAALO St.	871-9001
	Gregg Nelson	Renaissance Wailea Beach	3550 Wailea Alauni Dr.	879-4900
	Kris Holmes	Bigelow & Holmes	322 Alae Rd,	876-0032
	Charles Bigelow	individual	322 Alae Road, Kula 96790	876-0032
	Sherry Gibbs	Individual	309-A High St. Wailuku 96793	244-4446
	FLORE DELLA	UNION CARPENTER	805 MAKAALA, WAI.	244-9268
	Gregory Willson	CITIZEN	SRI Box 47 HAUKU HI 96708	573 4224
	Mokihana Calizar	citizen	585-A IAO VALLEY RD. 96743	243-9453
	Walter Little		585-A IAO VALLEY RD 96743	243-9453

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Martha E. Martin		P.O. Box 296, Paia HI 96779	571-7019
	Regina Lemm	Mauiana Magazine	P.O. Box 178, Kula HI 96790	876-0056

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
	Heeman Nascimento	CARP UNION	1117 MAK. AVE. MAUI HI.	572-8993
	Louise Rockett		PO Box 903 LAHAINA HI	661 5289
	Peter Gannett	Self/Earth	1135 Makawao Ave Ste 103-137 Makawao HI	878 3900
	Janet Simpson	Self	562 ROUTE 50 Kula HI 96790	878-6133
	Nancy Chapman	Maui Hotel Assoc. Hawaiian Cablevision	910 Hanaapitani Hwy Lahaina HI 96761	661-7058
	Nikhi LANANDA	HAWAII GREEN PARTY	P.O. BOX 1704 MAKAWAO MAUI 96768-1704	572-8787
	S. Thel	S.A.V.E. Maui Program	Kahului Shopping Center 96732	877-6070
	Frank G.	Present Future	10 Box 900 Kula 96790	
	Kili Naman'u	Self	115 Pea Place Kula 96790	878-3001
	Steve Fouts	SELF	562-F Piikoi OL MAUI HI	572-4887

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TESTIMONY SIGN-IN SHEET

Subject: Kahului Airport Draft Environmental Impact Statement Public Hearing
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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓ 11	Lisa Hamilton		SR. Box 190 ^{Honolulu}	248-8001
✓ 12	DAVE CHENOWETH	SELF	340 FRONT ST. LAHAINA, HI. 96761	661-8327
✓ 13	Cynthia Herberg	Kaanapali Beach Resort Association	45 Kai Ala Dr. Lahaina, HI	661-3271
✓ 14	Jeffrey Parker	"	"	"
✓ 15	Audrey M Garcia	MAUI TOMORROW	P.O. Box 1153 Makawao	572-9874
✓ 16	Karen Ardoin		223 Wukani Road, Kula	876-0615
✓ 17	STEVEN MOSER	-	1835 MILL ST	544-3788
✓ 18	MARY EVANSON	self		
✓ 19	A. B. Hughes	Self	158 Haulani ST. Pukalani, HI 96768	572-8864
✓ 20	DAN JUDSON	SELF	P.O. Box 115 Mak. 96768	

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓ 1	TOM CANNON		720 AWAIAU RD, HA'IKU	572-4699
✓ 2	Celeste King	Maui Aukoi Club	1061 Kekomani Rd., Ha'iiku	575-2225
✓ 3	Isaac Hall	Maui Mtn	2097 WEYS STREET WYOMING	244-5071
✓ 4	Dana Naone Hall	Hui Alanui Makua	"	"
✓ 5	Brian Huse	NPCA	Franklin St. Oakland, CA 94611	(510) 859-9122
✓ 6	Nicole Walther	NPCA	123 Townsend St. SF, CA 94107	(415) 536-1992
✓ 7	Charles K. Maxwell	SELF	157 Alca Plecc, Paoli	515-6036
✓ 8	Don Reesen	National Park Service	P.O. Box 269 Makawao, HI 96768	572-9306
✓ 9	MARSHA WIENERT	MAUI VISITORS BUREAU	1727 WIL. PA LOOP WAILUKU, HI	244-3530
✓ 10	JIM SHIFTE	MHA	c/o NAPII KAI BEACH 5900 HONOA PIILAI RD. LAHI	669-2271

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓31	SHIRLEY SHEPHERD	—	477 S. ALU, WAILUKU	244-7224
✓32	GLENN SHEPHERD	—	" " "	"
✓33	Masako Westcott		PO Box 485 Hailua 96708	
✓34	Bob De Meyer	"	RRI BOX 579 KULA	878-1874
✓34	Christine Kafka	—	P.O. Box 906, Kaikele	572-5038
✓35	Sally Rainsbeck		427 Liholiho St Wailuku	244-9604
✓36	MELISSA PRINCE		P.O.B. 650, Haiku, Hi. 96708	572-1867
✓37	ROBERT PARSONS		959 HANA HWY HAIKU HI 96708	572-1758
✓38	CRAIG NALBET	SELF	3740 L. HUNDA DRIVE # 705 LAHONA, HI 96761	669-0544
✓39	PATRICK RYAN	HAUI CHAMBER	250. ALAMAHA # N16A KAHULUI 96753	871-7711

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓21	Diana Sullivan	Citizen	P.O. Box 931, PAIA, HI 96779	243-2474
✓22	Rebeck Grassmann-Duvall	self	534 Olinda Rd. Makawao 96753	672-1554
✓23	Kathy Bungarz	—	P.O. Box 871, Kihei	
✓24	Doug MacCluer	Mami Pine	870 HAWAIIAN RD MAKAWAO	572-7211
✓25	Jack Thompson	Sprockelville Comm Assoc.	204 Kealahou Pl. Paia 96779	877-5749
✓26	LARRY FEINBERG	FATHER	305 Ahiolani St Pukalani HI 96768	572-2097
✓27	GREG WESTCOTT	M.M.P.	P.O. Box 485 Haiku	572-1609
✓28	Jody L. Mitchell	self	300 S. PUNAHU AVE. KAHULUI	—
✓29	Bron Bailey	✓	RR2 Box 126 Kula HI 96790	878-2668
✓30	Charles Kokes	self	P.O. Box 49, Paia 96779	579-9119

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓50	MARGO Berdeslovsky	Citizen	SRI Box 100 Haiku 96708	572-7882
0 51	Ellen Levisky	main resident	PO Box 1666 Lahaina HI 96761	661-8710
✓52	Stephen Pitt	Main Air Traffic Assoc	PO Box 109 Pava	871-8628
✓53	Robert Coffey	Serra Club	P.O. Box 2000 Kahului HI	244-9547
✓54	Leslie Kulotoi	FFERDC	469 MAALO ST.	871-4001
✓55	LUCIENNE deSARIE	Sierra Club	SRI BOX 47 HAIKU HI 96708	572-8331
✓56	Gregory Willson	CITIZEN	"	573-4224
✓57	Laurie Chang	"	4800 Makua Alakui HI 96733	874-6475
✓58	Ed Chang	"	" " "	" "
✓59	Dan Grantham	"	SRI, BOX 47 Haiku HI 96708	572-8331

S. K.

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Subject: Kahului Airport Draft Environmental Impact Statement Public HearingPlace: Kahului Airport, Gate 39Date: May 8, 1996Time: 7:00 p.m.

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓40	Peter KANE	Self	1150 Nanihoku Pl. Haiku, HI 96708	572-8891
✓41	Annie Kemper	Self	1539 Hobomast, Kihei	879-4621
✓42	KEN BARR	SELF	P.O. Box 1637, Kihei	879-6050
✓43	EVE CLUTE	self	PO Box 11634 LAHAINA	667-5058
✓44	Hannah Bernard	Hawaii Wildlife Fund	PO Box 5361 Lahaina	667-0837
✓45	WAYNE N. HEDANI	KAPALUA LAND CO. LTD.	1020 KAPALUA DR. KAPALUA MAUI HI 96761	669-5433
✓46	ERIC M. KANE	KAWAKA MAOLI	P.O. BOX 942 HAIKU, HI 96708	5729045
0 47	Buck J. JENSEN	SELF	3443 MALINA HI KIHAI 96753	874-2825
0 48	Dorothy ELIS	Self	#40 Kapaia place Kapaia HI 96761	669-2492
✓49	Hina Kneubuhl	Self	150 Aliiolani Pukalani HI 96768	573-0573

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓ 69	CHRIS CARTER	SELF	505-9 KAHULUI Lp / MAKAWA	573-0443
✓ 70	PAUL THOMAS	Self	PO Box 1272 Puuuene HI 96784	572-9506 23233
0 71	Paul Hugel	S.A.U.E. Maui Scientific Analysis & Visualization of the Environment	Kahului Shopping Center 96732	877-6670

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No.	Name	Organization	Address, City, State, Zip Code	Phone No.
✓ 60	Mary Schroeder		P.O. Box 1551 Kihui, HI 96753	879-5554
✓ 61	Pero Sisco		111 Kolowaha Pl. Kula	878-6749
✓ 62	Paul G. Hugel	Scientific Analysis - Visualization of the Environment	SSO Lipoa Parkway	
0 63	Diana Dahl	NOFA	2441 Lilihoi Rd, Aiea, HI 96708	572-1804
✓ 64	Sherril Carden	Bco Director	PO Box 102 Wahiawa	689-4743
0 65	Jimmy Rust	Puuu Coalition	P.O. Box 6251 Kah. 96732	244-9625
66	TERRY LUND	HAWAIIANS	MAKAWA HI	
67	MARK W. HARRIS	VICE-CHAIR VICOUNTRY CAL.	RR 1 BOX 578 KULA	878-1874
✓ 68	CATHLEEN NATIVIDAD HOOBS		MUKAANI HI	