

OFFICE OF PLANNING AND SUSTAINABLE DEVELOPMENT

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**BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAII**

In the Matter of the Petition of)	DOCKET NO. A21-810
)	
PULAMA LANAI)	OFFICE OF PLANNING AND
)	SUSTAINABLE DEVELOPMENT'S
To Amend the Land Use District Boundary)	DRAFT STATEMENT OF POSITION;
of Approximately 56.436 Acres of Land)	CERTIFICATE OF SERVICE
from the Agricultural District into the Urban)	
District at Lanai City, Island of Lanai,)	
County of Maui, State of Hawaii, Tax Map)	
Key Nos.: (2) 4-9-002:061(por.), (2) 4-9-)	
014:001(por.))	
_____)	

**OFFICE OF PLANNING AND SUSTAINABLE DEVELOPMENT'S DRAFT
STATEMENT OF POSITION**

Pursuant to Hawaii Administrative Rules ("HAR") § 15-15-55, the Office of Planning and Sustainable Development ("OPSD") submits this Draft Statement of Position of support for the reclassification of the Petition Area, subject to certain conditions. This Draft Statement of Position summarizes OPSD's position and describes the positions of State departments impacted by the proposed boundary amendment, to the extent this information is currently available. OPSD's position is based on the representations of the Petitioner and documents filed in these proceedings, coordination with the Petitioner and affected government agencies, and the statutes and regulations applicable to these proceedings. Additional information may become available in the future and will be reflected in OPSD's final position statement and written testimony.

PETITION OVERVIEW

General Information

The Petitioner Lanai Resorts, LLC dba Pulama Lanai (“Petitioner”) requests that the Land Use Commission (“Commission”) reclassify approximately 56.436 acres of land from the State Agricultural District to the State Urban District at Lanai City, Island of Lanai.

The Petitioner, a Hawaii limited liability company, is the fee owner of the Petition Area, Tax Map Key (“TMK”) Nos. (2) 4-9-002:061(por.) and (2) 4-9-014:001(por.) being proposed for reclassification under this Petition.

Proposed Use of the Petition Area

The Petition Area is part of a 76-acre site that Petitioner proposes to develop for the Hokuao Affordable Housing Project. In addition to the Petition Area, the project site includes an approximately 19.56-acre portion of TMK (2) 4-9-014:009, within the State Urban District and part of Lanai City. The Petitioner intends to build 150 single-family homes on 8,000- to 12,000-square foot lots for rent at both affordable and market-rate levels. The project will also include a one-acre park, a 1,500-square foot community center, bicycle and pedestrian pathways, and 60 parking stalls for intermittent use by Hokuao visitors.

Hokuao is an affordable housing project being developed under Hawaii Revised Statutes (“HRS”) § 201H-38, which provides exemptions from State and County land use regulations and an expedited land use entitlement process to promote the development of affordable housing. Seventy-six of the 150 units will be priced at affordable rates for low-moderate and moderate-income households ranging from 80% of the area median income up to no more than 140% of the area media income. The affordable units will remain affordable in perpetuity. The remaining 74 rental units in the project will be priced at market rates. The Petitioner intends to start construction of the affordable units first and add market-rate units at the 51% affordable/49% market ratio. In addition, the Petitioner has committed to renting 39 units in the existing 128-unit Iwiolo Hale rental project at rents affordable to very low- and low-income households with incomes below 80% of the area median income. Iwiolo Hale, owned by the Petitioner, is located outside of the project site.

Petition Area Description

The project site is shown in Petitioner's Exhibit I. The site is near the Lanai Police Station and Dole Park to the northeast and will connect to Lanai City via 9th Street and 12th Street extensions that intersect with Fraser Avenue. Pulama Lanai's Central Offices are located to the southeast of the site and the Lanai Wastewater Reclamation Facility ("WWRF") is located to the southwest. West of the Petition Area are vacant agricultural lands owned by the Petitioner. North of the Petition Area are two parcels owned by the County of Maui, one classified as State Urban and the other classified as State Agricultural, and one parcel owned by the State Department of Hawaiian Home Lands also in the State Agricultural District.

The Petition Area, formerly used for pineapple, has lain fallow for decades with no plans for cultivation. The lands in the Area are classified as "unique" on the Agricultural Lands of Importance to State of Hawaii maps and Petition Area soils are classified as "C" and "D" under the Land Study Bureau's rating system. The Area represents a tiny portion of the available agricultural lands on Lanai, only 0.38 percent of the over 13,000 acres of the previously cultivated pineapple lands.

KEY ISSUES OF CONCERN TO THE STATE

The following summarizes key issues related to areas of State concern in HRS §§ 205-16 and 205-17. OPSD's written testimony will recommend appropriate conditions, as necessary, to address any reasonably foreseeable impacts from the proposed project that have not been addressed by commitments made by Petitioner to avoid, minimize, or mitigate these impacts.

Impacts on Areas of State Concern

Natural Systems and Habitats

The project will be connected to the Lanai municipal wastewater collection system owned and operated by the County. The total capacity of the WWRF is 0.50 million gallons per day ("MGD"). The average actual daily flow is approximately 0.325 MGD. The Hokuao project is expected to produce an average daily flow of 0.050 MGD. The project would increase the total average daily flow to 0.375 MGD, approximately 75% of the total WWRF capacity of 0.50 MGD.

According to the State Department of Health, Wastewater Branch (“DOH-WWB”), the WWRF is currently under an Informal Notice of Violation for effluent exceedances at the facility. A DOH-WWB inspection in 2018 found that the WWRF exceeded the effluent limits for biochemical oxygen demand and suspended solids on numerous occasions, and the Branch’s review of submitted lab reports indicate that the exceedance violations have not been corrected since 2018. The County of Maui has developed and is implementing a corrective action plan with short-term and long-term solutions. However, the County’s schedule to design, construct, and complete the long-term solution is expected to be completed at the end of 2023.

In addition, HAR § 11-62-23.1(i) requires a facility plan be initiated when the actual wastewater flow reaches 75% of the design capacity, and the plan would need to be implemented when the actual wastewater flow reaches 90% of the design capacity. (OPSD Attachment 1.)

OPSD recommends that the final connection between the Hokuao project and the County’s WWRF be coordinated with the County’s schedule to complete its long-term solution for the exceedance violations.

Archaeological, Historic, and Cultural Resources

The Petitioner prepared an Archaeological Inventory Survey for the project that has been accepted by the State Department of Land and Natural Resources, State Historic Preservation Division (“SHPD”), and an Archaeological Monitoring Plan recommended and subsequently accepted by SHPD. (Petitioner’s Exhibits 2 and 18.) Petitioner also prepared a Cultural Impact Assessment (“CIA”) that found no evidence of customary or traditional native Hawaiian cultural practices in the Petition Area.

Natural Resources Relevant to Hawaii’s Economy

Water for the project will come from the Lanai Water Company that privately owns the domestic water system on Lanai. The sustainable yield of Lanai’s combined aquifers is estimated at 6 MGD. Most of the available water included in this estimate comes from the Central aquifer which is divided into two aquifer systems with an estimated sustainable yield of 3 MGD each.

The estimated increase in the average daily domestic water demand from the project at 150 housing units is approximately 0.0917 MGD. Adding this projected demand to the January 2020 12-month moving average of 1.6 MGD for the entire island results in an estimated total

usage of approximately 1.6917 MGD. This is below the 4.3 MGD threshold set by the Commission on Water Resource Management that triggers the designation of Lanai as a groundwater management area. (Petitioner's Exhibit 2.) Petitioner will be developing Well No. 7 to provide additional source capacity and reliability, and once completed, it will feed into the Lanai City distribution system.

Commitment of State Funds and Resources

The project is located within walking distance of Lanai High and Elementary School ("School"), the only school serving the island. The School has a capacity of 700 students; recent enrollment is approximately 550 to 575 students. The project is not expected to generate increased enrollment at the School.

The project site is approximately 8,030 feet from the Lanai Airport. All projects within 5 miles of Hawaii State airports may be subject to further review and permits such as Federal Aviation Administration Notice of Proposed Construction, advising prospective residents of potential aircraft noise, and consideration of landscaping plans and stormwater detention ponds to prevent the creation of hazardous wildlife attractants. (Petitioner's Exhibit 2.)

Kaumalapau Highway is a State Highway facility (State route 440) that runs perpendicular to Fraser Avenue on the east border of the project site. Petitioner prepared a Traffic Impact Analysis Report ("TIAR") that found that the project will not have any significant impact to Kaumalapau Highway. (Petitioner's Exhibit 2.)

Provision for Housing Opportunities

The Project will provide 76 units of privately-financed, affordable rental housing for low-moderate and moderate-income households in perpetuity. In addition, the Petitioner has committed to reserving 39 units at the existing Iwiolo Hale rental project for rent to very low- and low-income households with incomes below 80% of the area median income. (OPSD Attachment 2.)

SUMMARY OF CONFORMITY WITH STATE PLANNING STATUTES, COUNTY PLANS, AND OTHER DECISION-MAKING CRITERIA

Hawaii State Plan and State Functional Plans

The project conforms to the Hawaii State Plan, HRS Chapter 226, especially HRS §§ 226-4, 226-5, 226-6, 226-13, 226-15, 226-16, 226-19, 226-103, 226-104, and 226-106, and to the Housing State Functional Plan.

Coastal Zone Management Objectives and Policies, HRS Chapter 205A

The project is not located on the shoreline and is not within the Special Management Area. The project does not conflict with the objectives and policies of the Coastal Zone Management Program.

Removal of High-Capacity Agricultural Lands, Lands in Agricultural Use, or Lands Designated as Important Agricultural Lands

The soil quality of the agricultural lands in the Petition Area is poor and there is an abundance of higher quality agricultural lands on Lanai. The reclassification of the Petition Area from the State Agricultural District to the Urban District will not result in a loss of quality lands for agricultural use.

County Plans

The project is consistent with the objectives and policies of the Maui Countywide Policy Plan and the Lanai Community Plan. The Lanai Community Plan Land Use Map designates the project site as “Park”, “Open Space”, and a small portion of “Public/Quasi-Public”, and “Mixed-Use Residential”. The project site is zoned “Interim”, “Open Space”, “Active Open Space”, “Road”, and “Agriculture” under Maui County Zoning. Among the exemptions allowed under HRS § 201H-38, the Petitioner will be seeking exemptions from the Change of Zoning approval process, as well as County requirements, including public infrastructure and design standard elements. This will allow the project to proceed with the “Single Family” and “Park” uses as proposed.

CONCLUSION

Based on our preliminary assessment of the Project with respect to the Commission’s decision-making criteria, OPSD supports the proposed boundary amendment with conditions that

will address the concerns raised herein. The proposed boundary amendment does not conflict with HRS Chapter 205 and generally meets the Commission's decision-making criteria contained in HRS Chapter 205 and HAR Chapter 15-15. OPSD's position is contingent on the Petitioner's commitment to avoid, minimize, or mitigate Project impacts identified by the State herein and in this proceeding to the satisfaction of the relevant State agencies prior to the close of the Petitioner's case-in-chief, or by agreed-to conditions of approval.

OPSD distributed the Petition to State agencies for their review and comments; additional information or concerns may be forthcoming. Specific impacts on areas of State concern and recommendations on conditions to mitigate Project impacts will be discussed further in OPSD's written testimony.

DATED: Honolulu, Hawaii, this 13th day of October, 2021.

OFFICE OF PLANNING AND
SUSTAINABLE DEVELOPMENT
STATE OF HAWAII

Mary Alice Evans

MARY ALICE EVANS
Director

1

DAVID Y. IGE
GOVERNOR OF HAWAII



ELIZABETH A. CHAR, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer
to:

LUD - 2 4 9 002 061 etc Pulama Lanai
Island of Lanai ID 5806

September 29, 2021

Ms. Mary Alice Evans, Director
Office of Planning and Sustainable Development
235 South Beretania Street 6th Floor
Honolulu, Hawaii 96813

Attention: Mr. Aaron H. Setogawa
Email: aaron.h.setogawa@hawaii.gov



Dear Ms. Evans:

Subject: A21-810 State Land Use DBA, Approximately 56 Acres at Lanai City
Island of Lanai, County of Maui (Hokuao 201H Housing Project)
TMK (2) 4-9-002: 061 (portion), (2) 4-9-014: 001 (portion), (2) 4-9-014:009 (portion)

Thank you for allowing the Department of Health, Wastewater Branch (DOH-WWB) the opportunity to provide comments for the subject land use project.

The Lanai Wastewater Reclamation Facility (WWRF) which is planned to serve the proposed project is presently under an Informal Notice of Violation (INOV) from our office for effluent exceedances at the facility. Our operation and maintenance (O&M) inspection in 2018 found that Lanai WWRF exceeded the effluent limits for biochemical oxygen demand and suspended solids on numerous occasions. In addition, our review of the submitted effluent lab reports showed that the exceedance violations have not been corrected since 2018. The County of Maui (County) has developed and is implementing a corrective action plan with short-term and long-term solutions toward mitigating the effluent violations. However, the schedule provided by the County to design, construct, and complete their long-term solution for the effluent exceedances is expected to be completed at the end of 2023. Please note that the DOH-WWB will not be able to offer our concurrence with the subject project until the effluent violations at the Lanai WWRF are satisfactorily addressed.

Furthermore, it should be noted that our records indicate that the existing Lanai WWRF design capacity is 0.54 million gallons per day (mgd). The proposed project assessment indicated that the present influent flow to the Lanai WWRF is 0.315 mgd and the proposed anticipated additional flows associated with the project would result with a total influent average daily flow of 0.465 mgd at the Lanai WWRF. Therefore, pursuant to Hawaii Administrative Rules (HAR), Section 11-62-23.1(i) a facility plan would need to be initiated when the actual wastewater flow reaches 75% of the design capacity, and the plan would need to be implemented when the actual wastewater flow reaches 90% of the design capacity of the wastewater facility.

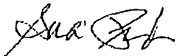
Please be informed that the proposed wastewater systems for the development may have to include design considerations to address any effects associated with the construction of and/or discharges

Ms. Mary Alice Evans, Director
September 29, 2021
Page 2

from the wastewater systems to any public trust, Native Hawaiian resources or the exercise of traditional cultural practices. In addition, all wastewater plans must conform to applicable provisions of the HAR, Chapter 11-62, "Wastewater Systems" and the Department of Health's "Reuse Guidelines" Volumes 1 and 2, 2016.

Should you have any questions, please call Mr. Mark Tomomitsu of my staff at (808) 586-4294.

Sincerely,



SINA PRUDER, P.E., CHIEF
Wastewater Branch

LM/MST:lmj

c: Mr. Roland Tejano, DOH-WWB, Maui
Ms. Sue Liu, DOH-WWB

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DAVID Y. IGE
GOVERNOR



DENISE ISERI-MATSUBARA
EXECUTIVE DIRECTOR

STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION
677 QUEEN STREET, SUITE 300
Honolulu, Hawaii 96813
FAX: (808) 587-0600

IN REPLY REFER TO:

21:PECB/70

October 5, 2021



TO: Mary Alice Evans, Director
Office of Planning and Sustainable Development

FROM: *for* Denise Iseri-Matsubara, Executive Director *Francis Paul Keeno*

SUBJECT: Petition for a State Land Use District Boundary Amendment
Docket No. A21-810, Pulama Lanai, Lanai City
TMK: (2) 4-9-002-061 (por), (2) 4-9-014-001 (por), (2) 4-9-014-009 (por)

We have reviewed the subject Petition for the proposed Hokuao 201H Affordable Housing Project and offer the following comments.

Petitioner proposes to construct 150 single-family dwelling units for lease at affordable and market rates, as well as a park, community center, and 60-stall parking lot in Lanai City. Development of the rental project will be on approximately 56 acres of private land and privately financed.

Seventy-six of the 150 units will be affordably priced for low-moderate and moderate-income households with incomes ranging from 80-140% of the area median income, with the remaining 74 units offered at market rents. Additionally, 39 units in the existing 128-unit Iwiole Vista rental project will be offered for rent to very low- and low-income households with incomes below 80% of the area median income.

Objective A of the State Housing Functional Plan (February 2017) is to increase and sustain the supply of permanent rental housing that is affordable and accessible to Hawaii residents, particularly those with incomes at or below 80% AMI. One of the strategies to attain this objective, is to expand and preserve the supply of affordable rental housing units through joint public/private efforts.

Policies A(2) and A(3) of the housing functional plan seek to:

- Encourage increased participation from private developers and other state entities to develop rental housing and

Ms. Mary Alice Evans, Director
October 5, 2021
Page 2

- Ensure that (1) housing projects and (2) projects which impact housing provide a fair share/adequate amount of affordable housing opportunities, including rental housing opportunities.

Petitioner's proposal conforms to these applicable objectives and policies of the State Housing Function Plan.

Should you have any questions, please contact Janice Takahashi, Chief Planner at 587-0639.
Thank you for the opportunity to comment.

3

DAVID Y. IGE
GOVERNOR OF HAWAII



ELIZABETH A. CHAR, M.D.
DIRECTOR OF HEALTH

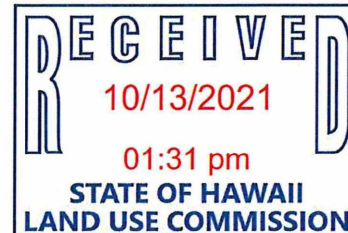
STATE OF HAWAII
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P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

09040PCTM.21

September 28, 2021

Mr. Aaron Setogawa
Planner
Office of Planning and Sustainable Development
P.O. Box 2359
Honolulu, Hawaii 96804



Dear Mr. Setogawa:

**SUBJECT: Comments on the A21-810 State Land Use DBA,
Approximately 56 Acres at Lanai City Project
Island of Lanai, County of Maui, Hawaii
TMKs: (2) 4-9-002:061 (por.), (2) 4-9-014:001 (por.), and
(2) 4-9-014:009 (por.)**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated September 20, 2021, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <https://health.hawaii.gov/cwb/files/2018/05/Memo-CWB-Standard-Comments.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like

Mr. Aaron Setogawa
September 28, 2021
Page 3

09040PCTM.21

community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
- c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,


ALEC WONG, P.E., CHIEF
Clean Water Branch

CTM:ak

Docket No. A21-810

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following by either hand delivery or depositing the same in the U.S. Postal Service by regular mail.

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DATED: Honolulu, Hawaii, this 13th day of October, 2021.

Mary Alice Evans

MARY ALICE EVANS

Director

Office of Planning and Sustainable Development