

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. A26-812
)	
PŪLAMA LĀNA'I)	OFFICE OF PLANNING AND
)	SUSTAINABLE DEVELOPMENT'S
To Amend The Agricultural and Rural Land)	STATEMENT OF POSITION;
Use District Boundaries Into the Urban Land)	CERTIFICATE OF SERVICE
Use District for approximately 170 acres of)	
land, consisting of a portion of Tax Map)	
Key No. (2)4-9-018:003(por.), (2)4-9-)	
002:061(por.), and (2)4-9-002:001(por.) at)	
Lāna'i City, Island of Lāna'i, County of)	
Maui, State of Hawai'i)	

OFFICE OF PLANNING AND SUSTAINABLE DEVELOPMENT'S STATEMENT OF POSITION

The Office of Planning and Sustainable Development ("OPSD") supports the reclassification of the Petition Area from the Agricultural and Rural State Land Use Districts ("SLUD") to the Urban SLUD. Submitted pursuant to Hawaii Administrative Rules ("HAR") § 15-15-55, this Statement of Position summarizes OPSD's position, identifies certain issues or questions, 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 Lāna'i Resorts, LLC dba Pūlama Lāna'i's ("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 that may become available will be reflected in OPSD's written testimony.

I. PETITION OVERVIEW

A. General Information

The Petitioner's Petition for Land Use District Boundary Amendment ("Petition") requests that the Land Use Commission ("Commission") reclassify approximately 170.225 acres of land in both SLUD Agricultural and Rural to the SLUD Urban to facilitate alignment with the underlying Lāna'i Community Plan designations and proposed County Zoning and Kō'ele Project District updates. The current SLUD designations of Agricultural and Rural do not allow for commercial events and hotel uses, which the Petitioner proposes with this reclassification.

The Petition Area consists of five areas comprising portions of three Tax Map Key (TMK) areas. The Petitioner, a Hawaii limited liability company, is the fee owner of the land being proposed for reclassification under this Petition located at TMK Nos. (2) 4-9-018:003(por.), (2) 4-9-002:061(por.), and (2) 4-9-002:001(por.) ("Petition Area").

Specifically, the Petitioner seeks to amend the land use district boundaries of approximately 95.844 acres of the Petition Area from the SLUD Agricultural to the SLUD Urban and approximately 74.381 acres of the Petition Area from the SLUD Rural to the SLUD Urban. The Community Plan states that the 170.225-acre Petition Area is designated Project District. A Final Environmental Assessment ("FEA") was published on February 8, 2022, for the Kō'ele Project District amendments, which includes the TMKs proposed in this Petition.

The following is a breakdown of current uses and zoning, and the proposed uses after the proposed SLUD reclassification to Urban.

B. Current and Proposed Zoning and Uses of the Petition Area

- (4-9-002:061 por.) 60.764 acres are currently in the SLUD Rural
 - *County Zoning*: ~14.5 acres is in the Project District and remaining 42.264 acres is in the Maui County Agriculture Zone
 - *Current Uses*: Part of Lāna'i Ranch that includes pastureland, a barn with stables, animal paddocks, a riding arena, and tennis courts that were formerly used by guests of the Sensei Lanai, a Four Seasons Resort and Four Seasons, Lanai (together, the "Resort"). Currently, Resort guests and Lāna'i residents can reserve a Ranch Experience.

- **Proposed Uses:** Renovations such as new or updated stables, riding arena, parking area, and outdoor venue for special events, which may be used for commercial events. The tennis court may be upgraded to accommodate pickle ball courts, a tennis pro shop and restrooms.
- (4-9-002:061 por.) 14.637 acres are currently in the SLUD Agricultural
 - *County Zoning:* Agriculture Zone
 - *Current Uses:* Part of Lāna‘i Ranch that includes pastureland for animals, which is used by Resort guests and the community.
 - **Proposed Uses:** Same as existing uses but may have upgrades to the existing facility and may be used for commercial events.
- (4-9-002:001 por.) 11.544 acres are currently in the SLUD Rural
 - *County Zoning:* Maui County Interim Zone
 - *Current Uses:* Currently not in use and formerly used for Pūlama Lāna‘i operations. There are two existing structures on the property: Forbes House and Ranch Office and Store, which are historic homes that have been relocated to this site.
 - **Proposed Uses:** Part of the hotel expansion and may include up to nine villas, approximately five spa hales, and four resort buildings (flex building, employee office and maintenance buildings).
- (4-9-018:003 por.) 81.207 acres are currently in SLUD Agricultural
 - *County Zoning:* Project District
 - *Current Uses:* Former golf course and is currently used as walking trails for Resort and Lāna‘i Adventure Park Guests.
 - **Proposed Uses:** To make a park (potential sculpture garden) for resort activities.
- (4-9-018:003 por.) 2.073 acres are currently in SLUD Rural
 - *County Zoning:* Project District
 - *Current Uses:* Former golf course and is currently used as walking trails for Resort and Lāna‘i Adventure Park Guests.

- ***Proposed Uses:*** To make a park (potential sculpture garden) for resort activities.

The Lāna‘i Community Plan states that the 170.225-acre Petition Area is designated Project District. The proposed types of uses will be similar to the uses currently occurring, but the SLUD Urban designation will allow for alignment with the Community Plan, proposed underlying zoning, and Project District designations for the properties. The SLUD Urban designation will allow for commercial uses, such as weddings and outdoor dinners. Additionally, new room-type options for Resort guests which are currently not possible on SLUD Agricultural and Rural. All proposed uses after reclassification are outlined above under “***Proposed Uses.***”

C. Petition Area Description

The Petition Area is shown in Exhibit 1 of the Petition. The Petition Area includes land that currently is partially undeveloped, prior golf course land, pastureland, tennis courts, and stables. The majority of the Petition Area is in the Kō‘ele Project District, as established by Maui County Council Ordinances Nos. 1580 and 1581 (1986), amended by Maui County Council Ordinances Nos. 2139 and 2140 (1992), and further amended by Maui County Council Ordinance No. 2852 (2000). For the Petition Area portions that are currently not in the Kō‘ele Project District, a Project District amendment has been referred to the Maui County Council Housing and Land Use Committee via Bills 24 (2024) and 25 (2024), which would put the entire Petition Area in the Maui County Project District Zone.

The lands in the area were once used for farming and ranch operations. The lands in the area are classified as “unclassified,” “Other,” or “Unique” on the Agricultural Lands of Importance to State of Hawaii (“ALISH”) maps and are classified by the University of Hawaii Land Study Bureau (“LSB”) as “C,” “D,” and “E.” The Project will result in the loss of approximately 95.8 acres of historically cultivated agricultural land and golf course.

The Petition Area consists of five portions of three TMKs, the furthest of which is within a half mile of Lāna‘i City. The Petition Area is located mauka (northeast) of Lāna‘i City.

II. 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 Project that have not been addressed by commitments made by the Petitioner to avoid, minimize, or mitigate these impacts.

A. Impacts on Areas of State Concern

1. Water Resources

Water for the Project will come from the Lāna'i Water Company that privately owns the domestic water system on Lāna'i. The island is divided into nine aquifer systems, and the Petition Area falls within the Leeward Aquifer System, which together with the Windward Aquifer System, comprises the Central Aquifer Sector. The sustainable yield of Lāna'i's combined aquifers is estimated at 6 million gallons per day ("MGD"), virtually all of which comes from the Central Aquifer Sector, with the sustainable yields of the Leeward Aquifer System and the Windward Aquifer System being 3.0 MGD each. The State Commission on Water Resources Management ("CWRM") has established a guideline of 4.3 MGD as the trigger to designate the island as a groundwater management area.

Based on the Lāna'i Water Company's 2025 Periodic Water Report, the total daily water demand on Lāna'i as of December 2025 was 1.738 MGD. According to the Petition, total estimated water demand for the Project Area, projected at this time, is as follows: (1) comfort station refurbishment: 1,500 gallons per day ("gpd"); (2) hotel expansion: 35,155 gpd; and (3) resort commercial uses (tennis courts, stables, pastures, and associated uses): 22,760 gpd for a total of estimated water demand for the Petition Area of 59,415 gpd (0.059415 MGD). Additionally, the Petition Area to be used as a park will be irrigated with R-1 water. Other proposed or approved projects are estimated to add 0.386 MGD to the total demand. Thus, the total forecasted water demand for Lāna'i with the Project Area is estimated at 2.18 MGD, below the CWRM trigger of 4.3 MGD. The Petition states that the Lāna'i Water Company has confirmed with the Petitioner that it has adequate reserve to supply the Petition Area with the estimated demand.

OPSD notes that the Lāna'i Community Plan 2016 states that most of the utilized water comes from the Leeward Aquifer System and hydrologists caution against relying on just one

side and spreading amongst both the Leeward and Windward Aquifer Systems. OPSD requests that the Petitioner further discuss this observation in relation to the proposed reclassification and proposed uses.

2. Agricultural Lands

The Project Area will result in the loss of approximately 95.8 acres of historically cultivated agricultural land and golf course. The Petition Area land that is located in SLUD Agricultural is designated by ALISH as Unclassified, Other, or Unique and are designated by LSB as having a soil rating of C, D, and E.

While the Project Area has some favorable agronomic conditions, such as soil conditions and good solar radiation, the Petition notes that the Project Area located in the SLUD Agricultural is not suitable for intensive field farming because of lack of irrigation water, the Lāna‘i market for agricultural products is small, and Lāna‘i farmers are at a competitive disadvantage in supplying the O‘ahu and mainland markets because of shipping costs. The FEA produced for the Kō‘ele Project District Amendment states that currently there is no demand for agricultural use in the Petition Area. The Petition also notes that there are approximately 18,000 acres of former plantation lands on Lāna‘i that remain available for agricultural uses and the proposed 95.8 acres to be removed from the SLUD Agricultural to Urban make up a fraction of the potentially cultivable acres on the island.

OPSD notes that a policy of the Lāna‘i Community Plan 2016 is to encourage the conservation of existing ALISH lands—classified as either Unique or Other Agricultural Land—for continued agricultural use rather than for development. OPSD further notes that much of the land proposed for reclassification is currently not in agricultural production and that historical pineapple cultivation required minimal water. OPSD recommends that the Petitioner provide additional discussion regarding consistency with the Community Plan, specifically addressing how the proposed reclassification of Unique and Other ALISH lands will be mitigated.

3. Archaeological, Historic, and Cultural Resources

The Petitioner conducted an Archaeological Literature Review and Field Inspection Report (“LRFI”) and a Cultural and Historic Resources Survey as an accompanying document for the proposed Project District Amendment for the FEA. The study found that although there are cultural resources in the Kō‘ele Project District, there are no cultural resources in the Petition

Area. The State Historic Preservation Division (“SHPD”) reviewed the LRFI Report (4/27/22 letter) noting that the “current submittal does not include a proposed project, and there are no proposed ground disturbances” and requested to review of any future projects involving ground-disturbing activities within the Kō‘ele Project District Amendment, which includes the parcels in the Petition Area.

Two structures (Forbes House and the Ranch Office & Store) located on the Petition Area were once part of Lāna‘i Ranch’s building inventory at Kō‘ele. The LRFI produced for the FEA recommended that both structures should be assessed by a qualified architectural historian. A Reconnaissance Level Survey was conducted for both structures and the study found that both structures do not retain integrity of Location, Design, Setting, Workmanship, Feeling, and Association and that both partially retain integrity of Materials. Based on this review, both structures were evaluated as not meeting HAR §13-284-6 significance and integrity criteria and therefore no mitigation was recommended for both structures due to the proposed finding of “no historic properties affected.”

OPSD notes that the SHPD letter that reviewed the LRFI Report (4/27/22), see Petition Exhibit 2, requests the County of Maui to flag TMKs (2) 4-9-002:061 (por.) and (2) 4-9-002:001 (por.) indicating to consult with SHPD regarding the identified historic properties on Parcels 061 and 001 at the time a future project is proposed within these parcels. OPSD requests that the Petitioner indicate if they have consulted with SHPD regarding this request.

4. Flood, Tsunami Hazards and Sea Level Rise

The Petition Area is located within Zone X on the Flood Insurance Rate Map for the County of Maui, an area of minimal flood hazard higher than the elevation of the 0.2% annual chance flood. The Petition Area is located between 1,600 and 2,000 feet above sea level and is located approximately 4 miles inland from the northern shoreline towards the center of the island. It is outside of the 3.2-foot sea level rise hazard area.

5. Flora and Fauna

A flora and fauna study was conducted for an area encompassing the 11.544-acre parcel and a portion of the 60.764-acre parcel. The 14.637-acre parcel was later acknowledged as omitted, but this omission was later deemed to not change the study results. The parcels of the former golf course were not included in the study.

No state or federally listed threatened or endangered species or rare native Hawaiian plant species were observed in the study. No listed endangered Hawaiian hoary bats were observed. The Endangered Hawaiian petrel and the Threatened Newell's shearwater were not observed in the study area but are likely to fly over the Petition Area. The study recommended that outdoor lights should be shielded and directed downwards to minimize impacts to seabirds.

6. Carbon Footprint/Sustainability and Resource Conservation

The Petitioner measured projected Greenhouse Gas ("GHG") emissions with the Environmental Protection Agency GHG Equivalencies Calculator to determine estimated carbon dioxide equivalents ("CO₂E") for the Project Area. Net GHG emissions associated with the Project is estimated at 138.5 million tons CO₂E. The Petition states that this is approximately equivalent to the annual emissions of 32 gasoline-powered passenger vehicles or the carbon sequestration capacity of approximately 2,300 tree seedlings grown over a ten-year period.

OPSD notes that the Petition states that the Project Area will remain over 90% in a vegetated or pasture state and will minimize impervious surfaces and feature large contiguous green areas and minimal building footprint. In addition, the proposed park area will use R-1 water for irrigation purposes.

7. Drainage

The Petition Area is located mauka (northeast) of Lāna'i City, and the rainfall in the region is seasonal. A portion of the former golf course, located on the 81.207- and 2.073-acre area, was designed to handle a majority of the drainage for the Kō'ele Project District. The 60.764- and 14.637-acre area consists primarily of pastureland, which can accommodate drainage, and the 11.544-acre area will be developed with on-site drainage. It is expected that any potential future improvements will include measures to mitigate increases to runoff as well as provide stormwater quality treatment in accordance with Maui County Standards.

8. Wastewater

The FEA states that wastewater generated by Kō'ele Project District is collected by 8-inch and 6-inch pipes and conveyed southwest towards the Lāna'i City Wastewater Treatment Plant. The Petition states that new wastewater flow would be generated in the new hotel area (e.g. addition of spa hales, villas, other amenities, etc.), resort commercial area (e.g. upgraded barn/stable, tennis courts and related amenities, special events, etc.), and park area (e.g. comfort

stations). Estimated wastewater demand has a projected hotel demand of 25,514 gpd, a resort commercial demand of 11,100 gpd, and a park demand of 1,500 gpd. The Petitioner states that the Lānaʻi City Wastewater Treatment Plant has capacity to treat the estimated additional wastewater generated as a result of the proposed development in the Petition Area. The FEA states that overall, the proposed Kōʻele Project District will cause a reduction in wastewater flows compared to the existing Kōʻele Project District, which is a result of a reduction in developable land.

9. Transportation

A Traffic Assessment was conducted as part of the FEA process for the Kōʻele Project District amendments, which is inclusive of the parcels under the Petition. The Petition states that the additional units will not impact traffic significantly since the Resort provides airport pickup and drop off for Resort guests. The Traffic Assessment evaluated potential impacts to State roadways within the vicinity of the proposed amended Kōʻele Project District, which included: Kaumālapaʻu Highway/Mānele Road, Kaumālapaʻu Highway/Fraser Avenue, and Kaumālapaʻu Highway/Lānaʻi Avenue. The FEA concluded that these study intersections will continue to operate similar to existing conditions upon full development of not just the Kōʻele Project District, but of the island of Lānaʻi.

B. Other Areas of Concern

1. Development Timetable

HAR § 15-15-50(c)(20) requires that the Petitioner represent that development of the Petition Area will be accomplished within ten years after the date of Commission approval. The purpose of the Petition is the reclassification of the Petition Area from Agricultural and Rural to Urban in order to implement the Lānaʻi Community Plan, to align with underlying zoning, the Kōʻele Project District, and provide for additional planned uses of the Petition Area that are currently not allowable under the existing LUC designations. As previously noted, the entire Petition Area of approximately 170.225 acres is designated Project District by the Community Plan, however not all of the Petition Area is designated as Project District under county zoning designation.

Currently Maui County Bill No. 24 (2024), Change in Zoning (Conditional Zoning), and Maui County Bill No. 25 (2024), Project District Amendment for Properties in Lāna‘i Project District 2 (Kō‘ele), have been referred to the Housing and Land Use Committee as of the date of the filing of the Petition. Both bills seek to place the areas in the Petition Area that are not in the Project District under county zoning into this district as well as amend language in Ordinance 1580, Kō‘ele Project District.

The following proposed development was provided pending the proposed reclassification at the state and county levels:

Petition Area	Current Use	Proposed Use
60.763- and 14.637-acre areas	Part of Lāna‘i Ranch and includes pastureland, a barn with stables, animal paddocks, a riding arena, and tennis courts.	Same as existing uses but may have new stables and upgrades/renovations to existing facilities and may be used for commercial events.
81.207- and 2.073-acre areas	Former golf course	Park for resort activities, such as a sculpture park.
11.544-acre area	Currently not in use and formerly used for Pūlama Lāna‘i operations. There are two existing structures on the property: Forbes House and Ranch Office and Store, which are historic homes that were relocated to this site.	Hotel expansion (Sensei Lāna‘i, a Four Seasons Resort), including up to nine villas, approximately 5 spa hales, and four resort buildings (flex building, employee office and maintenance buildings).

No explicit timetable was provided for the Petition Area reclassification and proposed development. Consequently, further information as to the timetable for development would be helpful in determining whether incremental districting is appropriate or should be waived.

III. SUMMARY OF CONFORMITY WITH APPLICABLE DISTRICT STANDARDS, STATE PLANNING STATUTES, COUNTY PLANS, AND OTHER DECISION-MAKING CRITERIA

The Petition Area is adjacent to lands currently classified as State Urban District, and are portions of larger TMKs that will continue to be SLUD Agricultural and Rural, see Petition Exhibit 3. The Petition generally meets the standards for determining State Urban District boundaries as set forth in HAR § 15-15-18. With appropriate mitigation, the proposed reclassification is generally consistent with one or more objectives, policies and priority guidelines of HRS Chapter 226, the Hawaii State Plan and to the State Employment, Tourism, and Historic Preservation State Functional Plans. In particular, the proposal supports local economic development in the tourism sector and provides a community benefit by supporting recreational opportunities and spaces for the community.

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 (“CZM”) Program and therefore generally meets the CZM Objectives and Policies of HRS Chapter 205A. The Petition Area does not involve lands designated as important agricultural lands pursuant to Part III of HRS Chapter 205.

The Petition Area is generally consistent with the County of Maui *General Plan 2030*, specifically aligning with some policies outlined within the following areas: A. Protect Natural Environment, F. Strengthen the Local Economy, G. Improve Parks and Public Facilities, and J. Promote Sustainable Land Use and Growth Patterns.

Maui County Bills 24 (2024) and 25 (2024) both seek to place the areas in the Petition Area that are not in the Project District, under county zoning, into the Project District, as well as amend language in Ordinance 1580, Kō‘ele Project District. The Lāna‘i Community Plan states that the 170.225-acre Petition Area is designated Project District.

IV. STANDARDS FOR DETERMINING URBAN DISTRICT BOUNDARIES

The Petition conforms to the standards for determining Urban District boundaries as set forth in HAR § 15-15-18. The Petition Area is adjacent to Lāna‘i City, which is the primary business center and contains 90 percent of the island’s population. Additionally, the Petition Area was chosen for its proximity to the Resort, as well as to other urban areas. Thus, the

Petition Area is characterized by “city-like” concentrations of people, structures, streets, urban level of services and other related land uses.

The Petition Area is located in Flood Zone X, not within a tsunami inundation zone, approximately 4 miles from the shoreline, and outside the 3.2-foot sea level rise hazard area. Reclassification of the Petition Area to the Urban District would extend the existing, adjacent urban use of the existing Resort and resort uses (such as the Lāna‘i Ranch lands). The Project Area petition proposal is consistent with State and county plans and will not contribute to scattered spot urban development. Most of the Petition Area has slopes of less than 10%. Consequently, the Petition is consistent with HAR §§ 15-15-18(1-8).

V. CONCLUSION

Based on our 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 before 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 29th day of May, 2026.

OFFICE OF PLANNING AND
SUSTAINABLE DEVELOPMENT
STATE OF HAWAII

Mary Alice Evans

MARY ALICE EVANS
Director

Docket No. A26-812

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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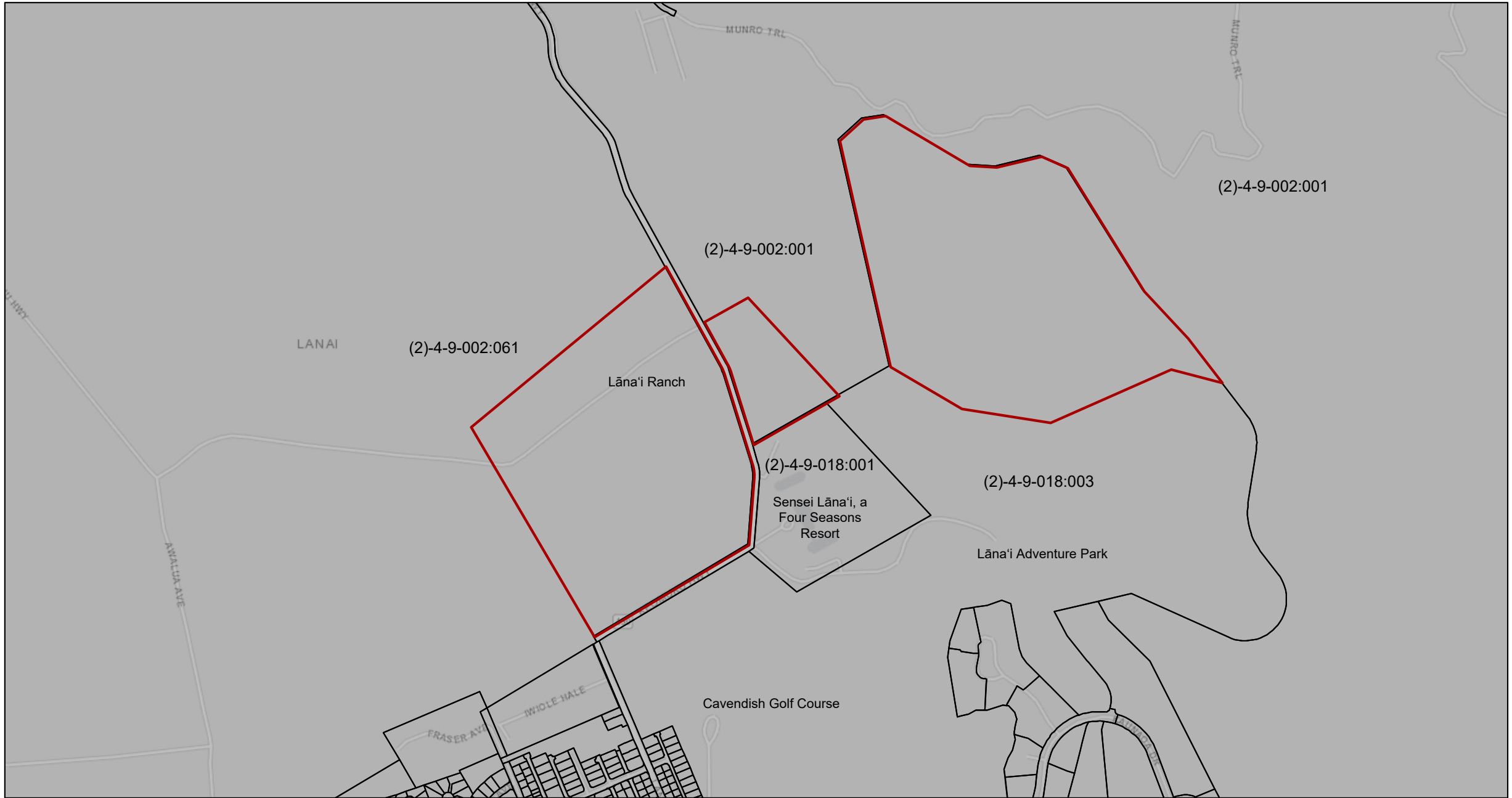
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DATED: Honolulu, Hawaii, this 29th day of May, 2026.

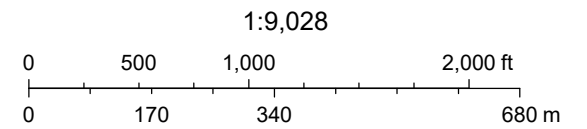
Mary Alice Evans

MARY ALICE EVANS
Director
Office of Planning and Sustainable Development

Petition Area



 Petition Area



Esri, HERE, Esri, HERE, Garmin, Intermap, USGS, EPA

EXHIBIT 1

DAVID Y. IGE
GOVERNOR OF
HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
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M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
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COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
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April 27, 2022

Michele Chouteau McLean, Director
County of Maui
Department of Planning
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c/o michele.mclean@co.maui.hi.us

IN REPLY REFER TO:
Project No. 2020PR33969
Doc. No. 2204IK01
Archaeology, Architecture

Dear Michele Chouteau McLean:

SUBJECT: **Chapter 6E-42 Historic Preservation Review -
County of Maui Permit Applications – CPA 2021/0001, CIZ 2021/0001,
PH1 2021/0001, and EA 2021/0002
Kō‘ele Project District Amendment and Draft Environmental Assessment
Literature Review and Field Inspection
Kamoku and Paoma‘i Ahupua‘a, Lāhainā District, Island of Moloka‘i
TMK: (2) 4-9-001:021, 024, 025 por., 027, 030; (2) 4-9-002:001 por. and 061 por.,
(2) 4-9-018:001, 002 por., 003 por., 004, 005; (2) 4-9-020:001 through 008, 010 through 019,
and 020 por.; and (2) 4-9-021:001 through 008, and 010**

This letter provides the State Historic Preservation Division’s (SHPD’s) review of the County of Maui Permit Applications CPA 2021/0001, CIZ 2021/0001, PH1 2021/0001, and EA 2021/0002 for the Kō‘ele Project District Amendment. SHPD received a County of Maui cover letter, a Pūlama Lāna‘i cover letter, an HRS 6E Submittal Form, a Draft Environmental Assessment (EA 2021/0002), and a draft archaeological literature review and field inspection (LRFI) report titled, *Archaeological Literature Review and Field Inspection for Kō‘ele Project District Amendment Kamoku and Paoma‘i Ahupua‘a, Lāhaina District, Lāna‘i Island, Archaeological Literature Review: TMKs: [2] 4-9-002:001 (portion) & :061 (portion), [2] 4-9-018:001, :002 (portion), :003 (portion), & :004, [2] 4-9-020:001-008, :010-019, & :020 (portion) and [2] 4-9-021:001-008, & :010, Field Inspection: (2) 4-9-002:001 (portion), & :061 (portion)* (DiVito et al., August 2020). SHPD received the submission on November 18, 2021 (Submission No 2020PR33969.002).

Pūlama Lāna‘i (landowner) proposes removing lands from the Project District designation and reclassifying them to other designations, adding lands to the Project District, and amending language within MCC Chapter 19.71. The proposed Project District comprises 564 acres and includes various parcels and tax map keys (TMK). The Kō‘ele Project District was initially established in 1986 via Ordinances 1580 and 1581 and amended in 1992 via Ordinances 2139 and 2140, which were approved by the Maui County Council. In addition, 14.5 acres of land containing the current stables and tennis courts are proposed to be zoned as “Resort Commercial” subdistrict designation along with additional lands in the area. The current submittal does not include a proposed project, and there are no proposed ground disturbances. Pūlama Lāna‘i indicates that future permits involving ground disturbance work within the Project District will require a separate HRS 6E review undertaken at that time and in conjunction with the future activity.

Honua Consulting produced the LRFI report (DiVito et al., August 2020) as an accompanying document for the proposed Project District Amendment. At the request of Pūlama Lāna‘i, the LRFI was conducted for two adjacent parcels proposed to be rezoned [TMK: (2) 4-9-002:061 por. (57.2 acres) and TMK: (2) 4-9-002:001 por. (9.5 acres)]

Michelle Chouteau McLean

4/27/2022

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and to provide an overview of documented historic properties within the current Kō‘ele Project District). The survey area totaled 66.7 acres. The field inspection included a 100% pedestrian survey with transects spaced 10 meters apart. The LRFI report includes an introduction, summaries of traditional and historical background information and previous archaeological studies, the results of a field survey, and conclusions. The LRFI report indicates that three previously identified historic properties are within the proposed Amended Project District. These are the Kō‘ele Historic District (SIHP #50-40-98-01004), a scatter of historic ranch-era artifacts associated with the Gay Lālākoa Homesteads (SIHP #50-40-98-01595), and traditional artifacts (SIHP #50-40-98-01596). The LRFI also documented four potential significant historic properties (SIHP #50-40-98-01988, 50-40-98-01989, 50-40-98-01004 Structure C, and 50-40-98-01004 Structure D) and three historic properties assessed to lack integrity or significance (Honua #2 [Historic Road remnant and drainage ditch], Honua #3 [Historic planter], and Honua #4 [Historic to Modern stockpile of imu rocks]). Additionally, four artifacts were collected from the surface, an ‘opihī shell, a basalt flake, and two pieces of volcanic glass.

Although the LRFI does not fulfill the requirements of an archaeological inventory survey as specified in HAR §13-276-5, it serves to facilitate project planning and supports the historic preservation review process. Please submit two hard copies of the LRFI report, clearly labeled FINAL, along with a text-searchable PDF copy of the report and a copy of this letter to the SHPD Kapolei office, Attn. Library. Also, submit a text-searchable PDF copy of the LRFI report to HICRIS Project 2020PR33969 using the Project Supplement option and a PDF copy of the report to lehua.k.soares@hawaii.gov.

Based on the information above, **SHPD has no objections** to the proposed Kō‘ele Project District Amendment (CPA 2021/0001, CIZ 2021/0001, PH1 2021/0001, and EA 2021/0002). The permit issuance process for the current permits may proceed.

SHPD requests to review future projects involving ground-disturbing activities within the Kō‘ele Project District Amendment. Additionally, **SHPD requests the County of Maui to flag** the following parcels within the Kō‘ele Project District Amendment, TMK: (2) 4-9-002:061 por. [57.2 acres] and TMK: (2) 4-9-002:001 por. [9.5 acres] indicating to consult with regarding the identified historic properties on Parcels 061 por. and 001 por. at the time a future project is proposed within these parcels.

Please contact Mary Kodama, Architectural Historian, at Mary.Kodama@hawaii.gov for any concerns regarding architectural resources, and ‘Iolani Kauhane, Historic Preservation Archaeologist III, at Iolani.Kauhane@hawaii.gov for any matters regarding archaeological resources or this letter.

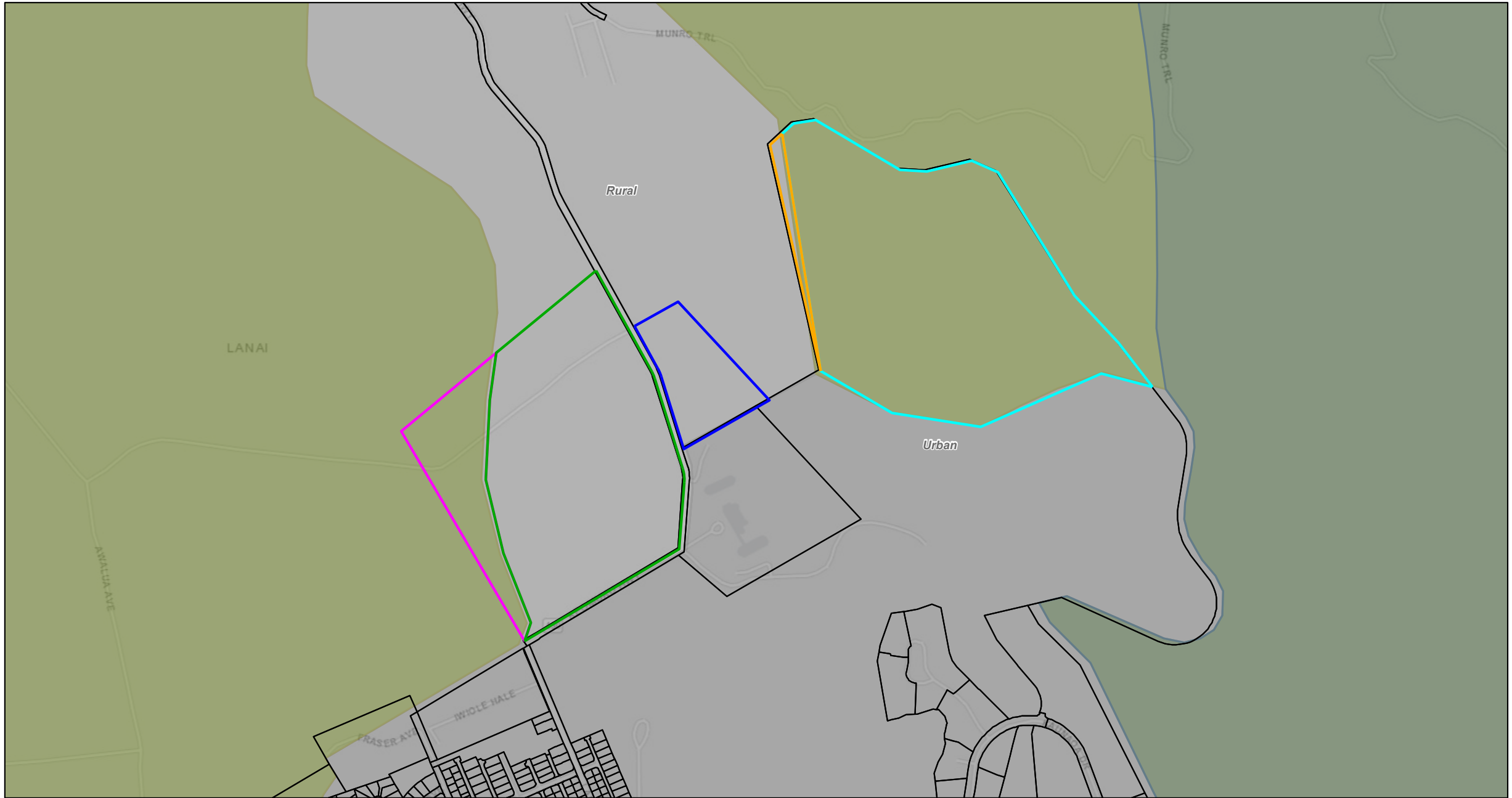
Aloha,

Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Keiki-Pua S. Dancil, kdancil@pulamalanai.com
Trisha Kehaulani Watson, watson@honaconsulting.com
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State Land Use Districts



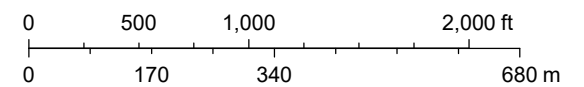
Petition Area

- 11.544-acre area
- 60.764-acre area
- 14.637-acre area
- 2.073-acre area
- 81.207-acre area

State Land Use Districts (SLUD)

- Conservation
- Rural
- Urban
- Agricultural

1:9,028



Esri, HERE, Esri, HERE, Garmin, Intermap, USGS, EPA

Exhibit 3