

OFFICE OF PLANNING AND SUSTAINABLE DEVELOPMENT

Leiopapa a Kamehameha, Room 600
235 South Beretania Street
Honolulu, Hawai'i 96813
Telephone: (808) 587-2846
Facsimile: (808) 587-2824



BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAI'I

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)	TESTIMONY IN SUPPORT WITH
Use District Boundaries Into the Urban Land)	CONDITION AND EXHIBITS;
Use District for approximately 170 acres of)	CERTIFICATE OF SERVICE
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 TESTIMONY IN SUPPORT WITH CONDITIONS AND EXHIBITS

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 Hawai'i Administrative Rules (“HAR”) § 15-15-55, this testimony 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.

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 Hawai‘i 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 are in the Project District and the remaining 42.264 acres are 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 Lāna‘i, a Four Seasons Resort, and Four Seasons Resort Lāna‘i (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 pickleball 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 are not currently permitted within the Agricultural and Rural SLUD districts. All proposed uses after reclassification are outlined above under “***Proposed Uses.***”

C. Petition Area Description

The Petition Area is shown in the Petition Exhibit 1. The Petition Area includes land that currently is partially undeveloped, former 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 Ordinance Nos. 1580 and 1581 (1986), amended by Maui County Council Ordinance 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 ranching operations. The lands in the area are classified as “unclassified,” “Other,” or “Unique” on the Agricultural Lands of Importance to State of Hawai‘i (“ALISH”) maps and are classified by the University of Hawai‘i 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 Lānaʻi Water Company that privately owns the domestic water system on Lānaʻi. 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 Lānaʻi's combined aquifers is estimated at 6.0 million gallons per day ("MGD"), virtually all of which comes from the Central Aquifer Sector, which includes the sustainable yields of the Leeward Aquifer System and the Windward Aquifer System estimated at 3.0 MGD each. The State Commission on Water Resource Management ("CWRM") has established a guideline of 4.3 MGD as the trigger to designate the island as a groundwater management area. It is noted that the State of Hawaiʻi Department of Hawaiian Home Lands ("DHHL") has a groundwater reservation for 0.067 MGD from the Leeward aquifer system.

Based on the Lānaʻi Water Company's 2025 Periodic Water Report, the total daily water demand on Lānaʻi 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 recycled water. Other proposed or approved projects are estimated to add 0.386 MGD to the total demand. Thus, the total forecasted water demand for Lānaʻi with the Project Area is estimated at 2.18 MGD, below the CWRM trigger of 4.3 MGD. The Petition states that the Lānaʻi Water Company has confirmed with the Petitioner that it has adequate reserve to supply the Petition Area with the estimated demand.

In its comments on this Petition, CWRM notes that the Petition Area falls within both the Windward and Leeward aquifer systems, not just the Leeward aquifer system. See OPSD Exhibit 2 for CWRM comment letter.

Additional comments from CWRM included the following:

- Should the proposed uses require new groundwater sources, well construction permits and pump installation permits from CWRM are required before ground water can be developed as a source of supply.
- Should the Petition be approved, the Petitioner should coordinate with the Maui County Department of Water Supply and Planning Department to incorporate the anticipated future water demands into the upcoming Water Use and Development Plan Update for the Island of Lānaʻi.
- DHHL has a groundwater reservation for 0.067 MGD from the Leeward aquifer system.

In their comments on this Petition, DHHL appreciates that the Petitioner acknowledges DHHL's water reservation and incorporates it into its water demand estimates for all water demand on Lānaʻi. DHHL notes that it was not on the agency consultation list for the Draft or Final Environmental Assessments for the Kōʻele Project District Amendment and that the Project District boundary is less than half a mile away from fifty acres of Hawaiian Home Lands. Thus, DHHL encourages the Petitioner to actively coordinate and consult directly with DHHL on an ongoing basis regarding water, wastewater, stormwater management, and traffic, dust and noise mitigation. This coordination was requested as both DHHL and the County of Maui are moving forward with their respective affordable housing initiatives at the same time Pūlama Lānaʻi is seeking this District Boundary Amendment (DBA) and advancing forward with their resort expansion plans. See OPSD Exhibit 3 for DHHL comment letter.

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 is 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.

The State of Hawai‘i Department of Agriculture and Biosecurity (“DAB”) states that the areas near Sensei Lāna‘i and the surrounding lands were cultivated in pineapple by Hawaiian Pineapple Company until 1992. DAB additionally notes that the 2015 and 2020 Hawai‘i Statewide Agricultural Land Use Baseline reports show an increase to 95 acres from 54 acres of conventionally cropped diversified agriculture, which is located north of Lāna‘i Airport and about 2.5 miles southwest of the Petition Area. DAB concluded “that the reclassification of the approximately 95.8 acres of Agricultural District land will not adversely affect existing agricultural activities, resources, and farm workers as there are none, and is unlikely to adversely affect the establishment of potential agricultural operations on adjacent vacant agricultural lands.” See OPSD Exhibit 4 for DAB comment letter.

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 the opportunity to review 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 neither structure retain integrity of Location, Design, Setting, Workmanship, Feeling, and Association and that both only partially retain the integrity of their 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 Petitioner’s Exhibit 9, requests the County of Maui to flag TMKs (2) 4-9-002:061 (por.) and (2) 4-9-002:001 (por.) to indicate 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. The Petitioner states that they will consult with SHPD regarding these identified parcels when a future project is proposed within those parcels.

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 toward the center of the island. It is outside of the 3.2-foot sea level rise hazard area.

The State of Hawai‘i Department of Land and Natural Resources (“DLNR”) notes in their comment letter that “the owner of the project property and/or representative is responsible for researching the Flood Hazard Zone designation for the project.” DLNR additionally notes that local community flood ordinances may stipulate higher standards that can be more restrictive than and take precedence over the minimum National Flood Insurance Program (“NFIP”), Title 44 of the Code of Federal Regulations. See OPSD Exhibit 5 for DLNR comment letter.

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 recycled water for irrigation purposes.

The State of Hawai'i Department of Transportation ("HDOT") recommends in its comments that the project activities: (1) incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions; (2) implement energy-efficient technologies and practices, such as light-emitting diode lighting; and (3) use sustainable, recycled, or low-emission materials in construction and manufacturing.

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 toward 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 Lāna‘i 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 Kō‘ele Project District will cause a reduction in wastewater flows compared to the existing Kō‘ele Project District, which is a result of a reduction in developable land.

9. Transportation

A Traffic Assessment (“TA”) was conducted as part of the FEA process for the Kō‘ele 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 TA evaluated potential impacts to State roadways within the vicinity of the proposed amended Kō‘ele Project District, which included: Kaumālapa‘u Highway/Mānele Road, Kaumālapa‘u Highway/Fraser Avenue, and Kaumālapa‘u Highway/Lāna‘i Avenue. The FEA concluded that these study intersections will continue to operate similar to existing conditions upon full development of not just the Kō‘ele Project District, but of the island of Lāna‘i.

In its comment letter, HDOT states concerns that the revised TA, dated 12/2/2021, may not be relevant to existing and projected traffic conditions by the time the project is ready for construction. Additionally, HDOT notes that the Petition Area is approximately 2.52 miles from

the property boundary of Lāna‘i Airport (“LNY”). See OPSD Exhibit 6 for DOT comment letter.

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 Lāna‘i Community Plan, to align with underlying zoning, the Kō‘ele Project District, and provide for additional planned uses of the Petition Area that are currently not allowable under the existing land use 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.

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 the 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).
------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The Petitioner states that “development of the Petition Area in accordance with demonstrated need therefore will be accomplished within ten years of the date of Commission approval.”

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 is a portions of larger TMKs that will continue to be SLUD Agricultural and Rural, see Petition Exhibit 7. 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 Hawai‘i State Plan and 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 service 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. RECOMMENDATION

Based on its assessment of the Petition 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 meets the Commission’s decision-making criteria contained in HRS Chapter 205 and HAR Chapter 15-15. OPSD recommends the approval of the Petition subject to the Petitioner’s commitment to avoid, minimize, or mitigate project impacts as represented herein and in this proceeding, and the imposition of conditions in addition to the standard conditions of the Commission.

- 1. FAA Notice of Construction:** Prior to any construction, the Petitioner shall submit to the FAA, FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal.
- 2. Notification of Proximity to Lāna‘i Airport:** The Petitioner shall notify and disclose to all prospective lessees within the Petition Area, as part of any conveyance document (lease, rental agreement, etc.) required for the transfer of real property or any interest in real property, of the potential adverse impacts of aircraft activity at and from the Lāna‘i Airport such as noise, right of flight, emissions, vibrations, and other incidences of aircraft operations.
- 3. Hazards to Aircraft Operations:** The Petitioner shall not provide landscape or vegetation that will create a wildlife attractant. Stormwater retention basins shall be designed, engineered, constructed, and maintained to prevent standing water from accumulating for periods longer than 48 hours after a storm event so as to avoid attracting wildlife. If any project within the Petition Area creates a wildlife attractant that can potentially become a hazard to aircraft operations, the developer shall immediately mitigate the hazard upon notification by the HDOT-A and/or FAA.
- 4. Traffic Assessment:** Prior to Project District Amendment approval for Phase 2, the Petitioner shall provide an updated TA, which should use up-to-date and relevant data for the existing traffic conditions and describe the projected changes based on the development plan for lands within the project district. If the qualitative TA suggests a potential for adverse impact to state roadways, the preparation of a Traffic Impact Analysis Report by a licensed professional engineer is required, with recommended mitigation, for the HDOT’s review and approval. If the project construction is phased over multiple years, interim horizon years shall be analyzed for the completion of each phase.
- 5. Direct, Secondary, and Cumulative Traffic Impacts:** For any project initiated pursuant to this Petition, the Petitioner shall conduct an assessment of the project’s potential direct, secondary, and cumulative impacts on state roadways (including

multimodal traffic) at full implementation of the project buildout. Cumulative impacts shall include updates on Pūlama Lāna‘i’s other development projects and other planned development projects, including their anticipated traffic impacts on state roadways, specifically at intersections with Lāna‘i City roads. The Petitioner shall submit each assessment to HDOT.

6. **Water Use and Development Plan Update:** The Petitioner shall coordinate with Maui County Department of Water Supply and Planning Department to incorporate the anticipated future water demands into the upcoming Water Use and Development Plan Update for the Island of Lāna‘i.
7. **Impacts to Seabirds:** For nighttime lighting that might be required, the Petitioner shall install fully shielded lights to minimize the attraction to seabirds. Nighttime work that requires outdoor lighting shall be prohibited during the seabird fledging season from September 15 through December 15.

DATED: Honolulu, Hawai‘i, this 19th day of June, 2026.

OFFICE OF PLANNING AND
SUSTAINABLE DEVELOPMENT
STATE OF HAWAI‘I

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.

CALVERT G. CHIPCHASE, ESQ.	cchipchase@cades.com
CHRISTOPHER T. GOODIN, ESQ.	cgoodin@cades.com
STACEY F. GRAY, ESQ.	sgray@cades.com
MOLLY A. OLDS, ESQ.	molds@cades.com
Cades Schutte LLP	
1000 Bishop Street, Suite 1200	
Honolulu, Hawai'i 96813-4212	

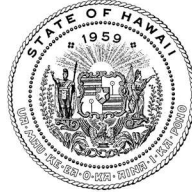
JACKY TAKAKURA	jacky.takakura@co.maui.hi.us
Director	
Department of Planning	
County of Maui	
2200 Main Street, Suite 315	
Wailuku, Hawai'i 96793	

MOANA LUTEY	
Corporation Counsel	
MICHAEL HOPPER, ESQ.	michael.hopper@co.maui.hi.us
Deputy Corporation Counsel	
Department of the Corporation Counsel	
County of Maui	
200 South High Street, 3 rd Floor	
Wailuku, Hawai'i 96793	

DATED: Honolulu, Hawai'i, this 19th day of June, 2026.

Mary Alice Evans

MARY ALICE EVANS
Director
Office of Planning and Sustainable Development



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES | KA 'OIHANA KUMUWAIWAI 'ĀINA
COMMISSION ON WATER RESOURCE MANAGEMENT | KE KAHUWAI PONO
P.O. BOX 621
HONOLULU, HAWAII 96809

May 26, 2026

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

FROM: Ciara W.K. Kahahane, Deputy Director
Commission on Water Resource Management *AK*

SUBJECT: A21-812 Pūlama Lāna'i, Kō'ele Project District, State Land Use District
Boundary Amendment for Approximately 170 acres at Tax Map Keys (TMK): (2)
4-9-018:003 (por), 4-9-002:061 (por), and 4-9-002:001 (por). Lāna'i City, Maui,
Hawai'i

Thank you for the opportunity to comment on the subject petition for a State Land Use District Boundary Amendment (DBA) from the State Land Use Agricultural and Rural Districts to the State Land Use Urban District. The Commission on Water Resource Management (CWRM) is the agency responsible for the management and regulation of Hawai'i's freshwater resources. This mandate is carried out in part through the Hawai'i State Water Code, Chapter 174C, Hawai'i Revised Statutes (HRS) (Water Code). CWRM understands that the purpose of the proposed State Land Use reclassification is to align with the updated Lāna'i Community Plan (2016) and to facilitate future development that is consistent with the planned use of the area. CWRM has no objections to the proposed land use reclassification but offers the following comments.

- The identified TMKs and petition area fall within Lāna'i's Central aquifer sector, which contains the Windward and Leeward aquifer systems. Contrary to the DBA petition, the petition area falls within both the Windward and Leeward aquifer systems, not just the Leeward aquifer system (see Figures 1 and 2).

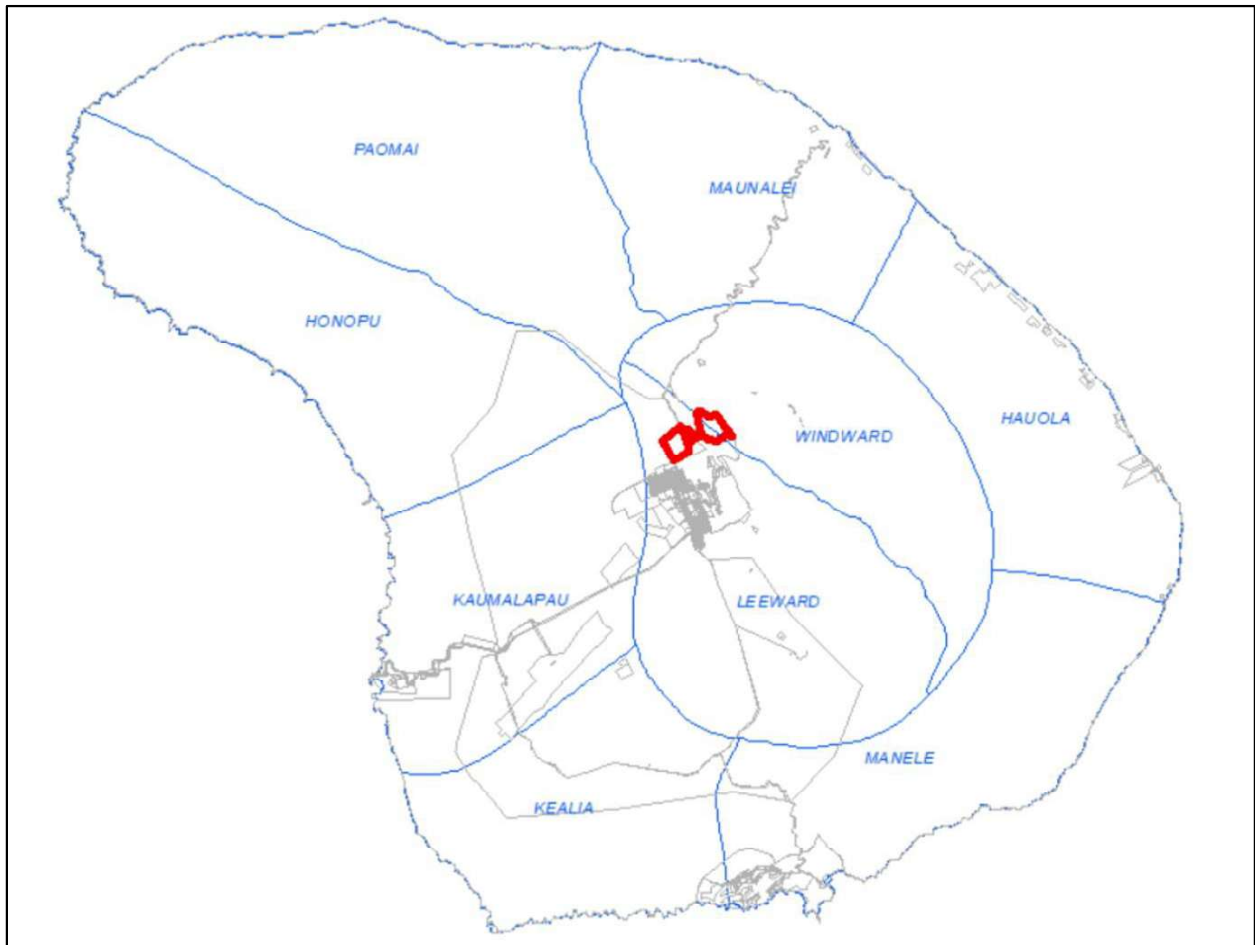


Figure 1. Map showing the petition area (outlined in red) with Lāna‘i’s groundwater hydrologic units/aquifers (outlined in blue).

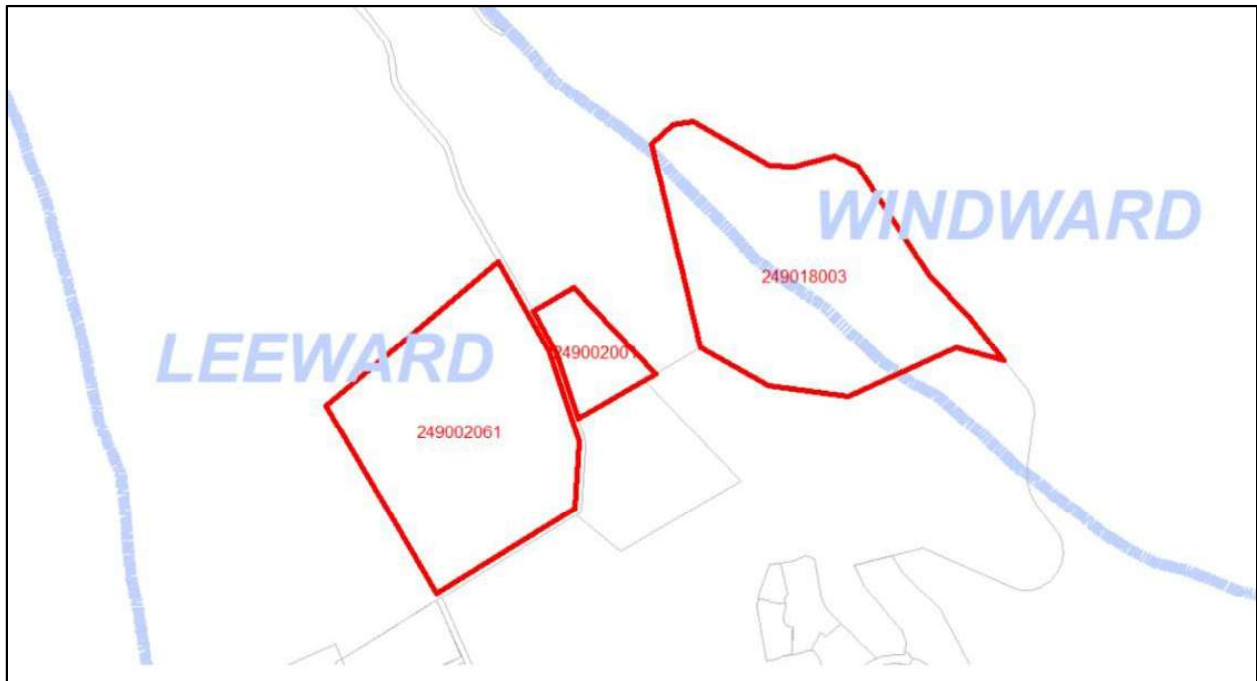


Figure 2. Zoomed in map shows the petition area (outlined in red) falls within both the Windward and Leeward aquifer systems (outlined in blue).

- The sustainable yield for both the Windward and Leeward aquifer systems is currently 3 million gallons per day (mgd) respectively (see Figure 3).

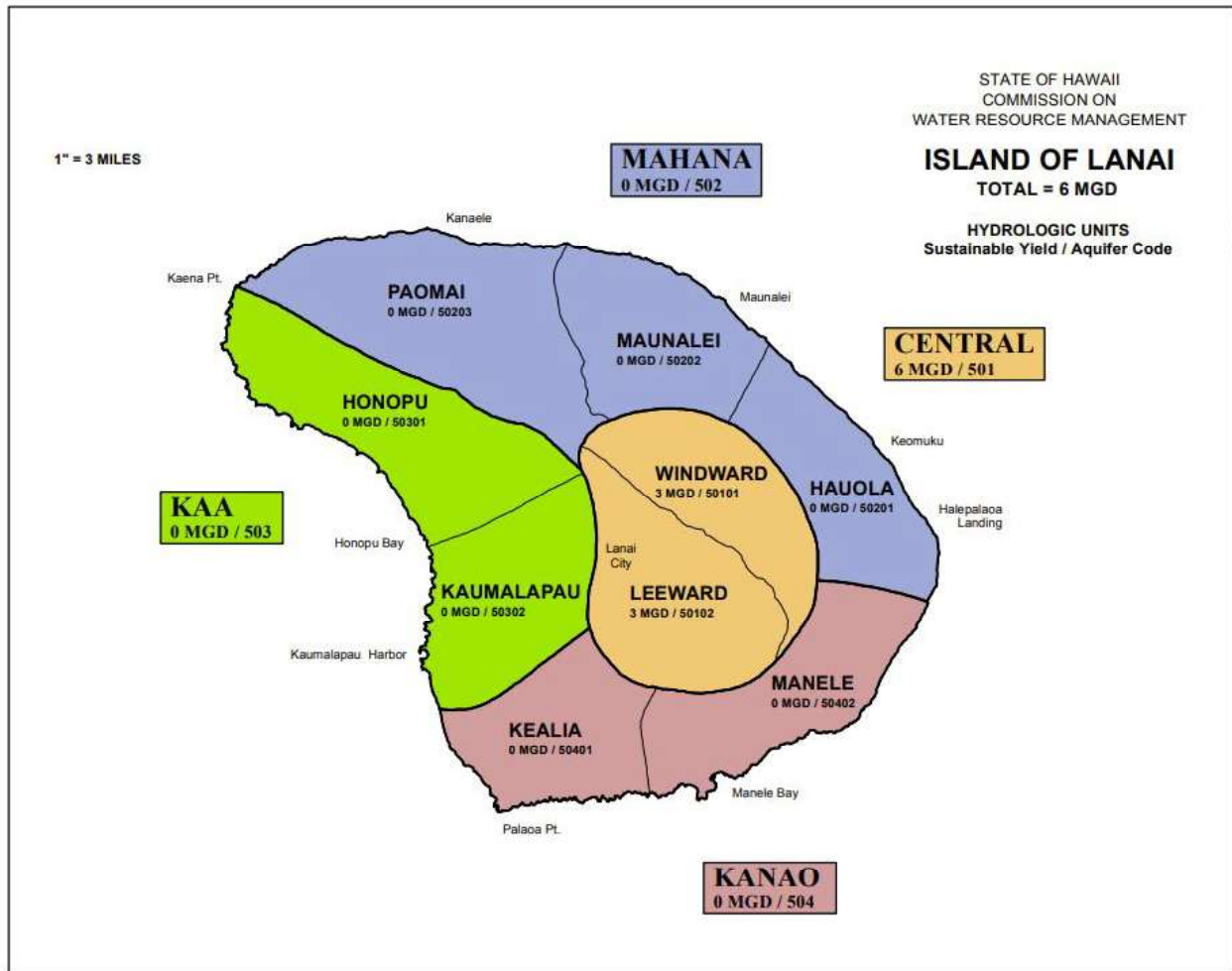


Figure 3. Map of the island of Lāna‘i’s groundwater hydrologic units/aquifers and the sustainable yields for each aquifer sector, including the Central aquifer sector shown in yellow.

There are 8 production wells in the Central aquifer sector. Of these, all 8 are reporting water use and are the basis for the graphs below. Reported pumping from the wells reporting within the Windward aquifer system is 0.039 mgd on a 12-month moving average as of February 2026 and accounts for approximately 1.3% of the sustainable yield (see Figure 4). Reported pumping from the wells reporting within the Leeward aquifer system is 1.665 mgd on a 12-month moving average as of February 2026 and accounts for approximately 55.5% of the sustainable yield. (see Figure 5). Reported pumping within both aquifer systems is below the sustainable yield.

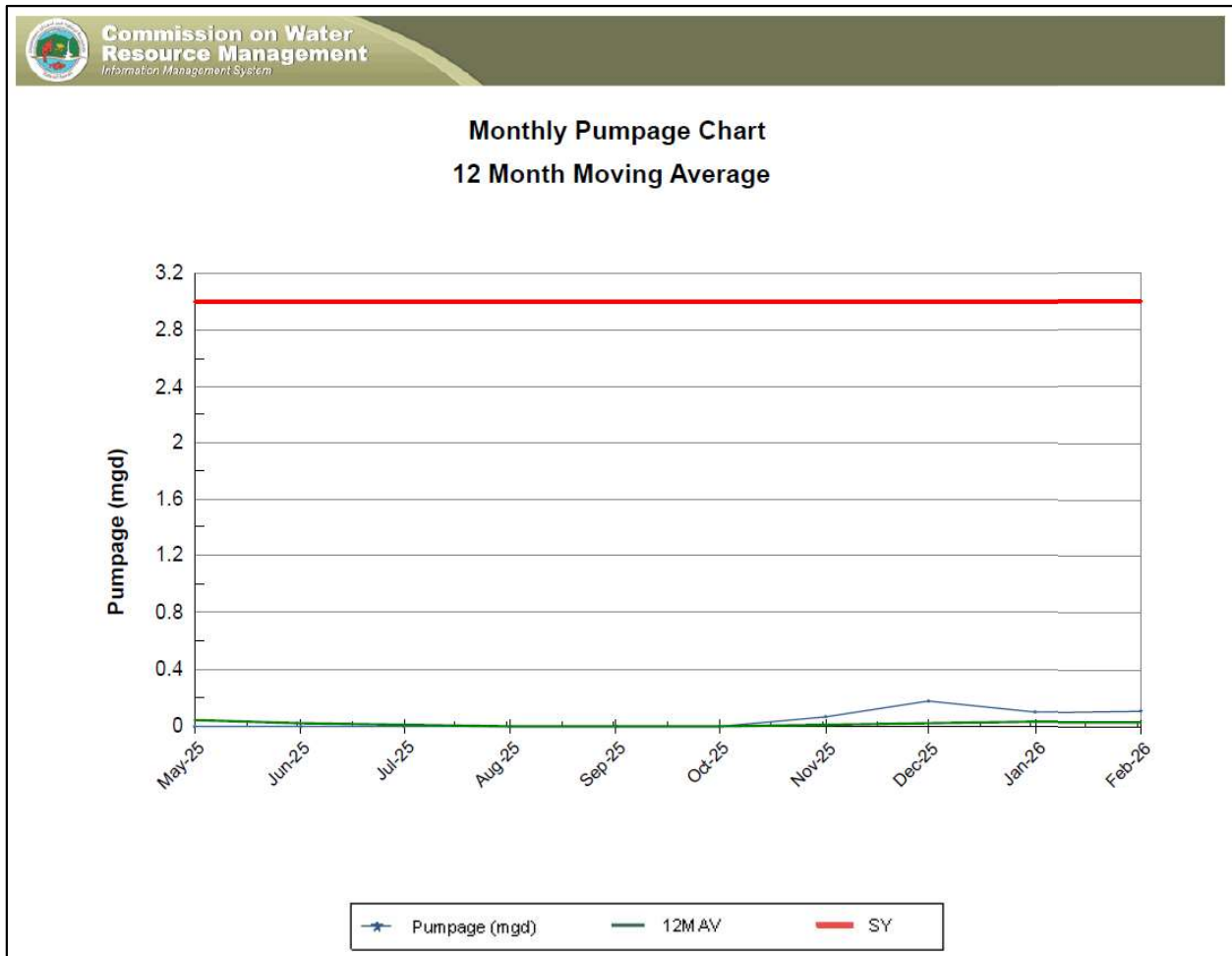


Figure 4. A graph showing the monthly pumpage between May 2025 to February 2026 in the Windward aquifer system. The blue line shows reported pumpage. The green line shows the 12-month moving average (MAV). Reported pumping within the Windward aquifer system is below the sustainable yield (red line).

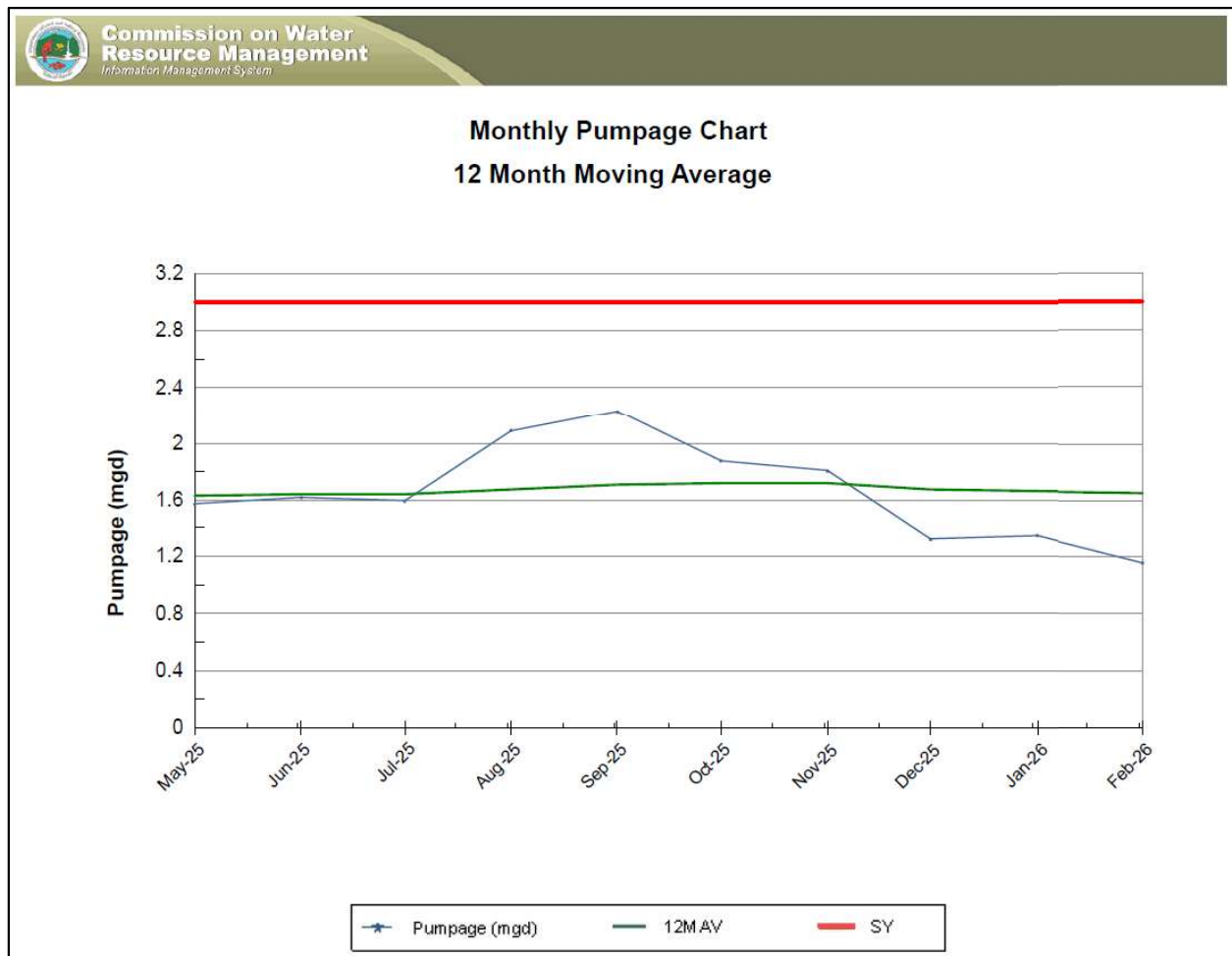


Figure 5. A graph showing the monthly pumpage between May 2025 to February 2026 in the Leeward aquifer system. The blue line shows reported pumpage. The green line shows the 12-month moving average (MAV). Reported pumping within the Leeward aquifer system is below the sustainable yield (red line).

- The Department of Hawaiian Home Lands (DHHL) has a groundwater reservation for 0.067 mgd from the Leeward aquifer system.¹
- According to the DBA petition, a change in the State Land Use District from Rural/Agriculture to Urban for the identified TMKs is estimated to result in a water demand of 0.059415 mgd. This demand will be supplied from existing sources operated by the Lānaʻi Water Company. No new groundwater wells are planned as part of the project currently. Should the proposed uses require new groundwater sources, well construction permits and pump installation permits from CWRM are required before ground water can be developed as a source of supply.

¹ <https://files.hawaii.gov/dlnr/cwrmsubmittal/2018/sb20180918B1.pdf>

- The Water Code requires each County to update its water use and development plans as necessary to maintain consistency with its zoning and land use policies (§174C-31 HRS). Should the DBA petition be approved, please coordinate with the Maui County Department of Water Supply and Planning Department to incorporate the anticipated future water demands into the upcoming Water Use and Development Plan Update for the Island of Lāna‘i.
- CWRM strongly promotes the efficient use of Hawai‘i’s water resources through conservation measures and appropriate resource management. CWRM acknowledges and appreciates the continued use of recycled water (R-1) to irrigate the proposed park. For more information, please refer to the Water Code, Chapter 174C, HRS, and Hawai‘i Administrative Rules, Chapters 13-167 to 13-171. These documents are available at <https://dlnr.hawaii.gov/cwrn/aboutus/laws/>.

If you have any questions, please contact CWRM’s Hydrologic Planning Program Manager, Katie Roth, at katie.c.roth@hawaii.gov.

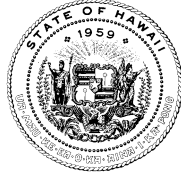
Signature:



Email: ciara.wk.kahahane@hawaii.gov

JOSH GREEN, M.D.
GOVERNOR
STATE OF HAWAII
*Ke Kia'āina o ka Moku'āina 'o
Hawai'i*

SYLVIA J. LUKE
LT. GOVERNOR
STATE OF HAWAII
*Ka Hope Kia'āina o ka Moku'āina
'o Hawai'i*



KALI WATSON
CHAIRPERSON, HHC
Ka Lama Ho'okele

KATIE L. LAMBERT
DEPUTY TO THE CHAIR
Ka Hope Lama Ho'okele

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
Ka 'Oihana 'Āina Ho'opulapula Hawai'i

P. O. BOX 1879
HONOLULU, HAWAII 96805

June 15, 2026

PO Ref: PO-26-051

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

FROM: Kali Watson, Chairperson
Department of Hawaiian Home Lands

SUBJECT: A21-812 Pūlama Lāna'i, Kō'ele Project District
State Land Use District Boundary Amendment for approximately 170 acres
at Tax Map Keys (TMK): (2) 4-9-018:003 (por), 4-9-002:061(por), and 4-9-
002:001 (por), Lāna'i City, Maui County, Hawai'i

The Department of Hawaiian Home Lands (“DHHL,” “Department”) understands that the purpose of the Petition is to amend the Agriculture and Rural Land Use District Boundaries into the Urban Land Use District for approximately 170 acres of land, consisting of a portion of Tax Map Key No. (2) 4-9-0018:003 (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. The Department also understands that Pūlama Lāna'i seeks the reclassification of the Petition Area from the Agricultural and Rural Districts to the Urban District in order to conform with the Community Plan and the proposed underlying zoning and amended Project District. A Final Environmental Assessment and Finding of Significant Impact (FONSI) in support of the amendment to the County of Maui's Kō'ele Project District ordinance was published in The Environmental Notice on February 8, 2022.

DHHL would like to note that it was not on the agency consultation list for the Draft or Final Environmental Assessments for the Kō'ele Project District Amendment, even though eight other state agencies were contacted and the Project District boundary is less than half a mile away from fifty acres of Hawaiian Home Lands. One comment DHHL would have provided if it had been consulted would be for the Environmental Assessment to include at least one map showing land ownership in the vicinity of the Project District, with DHHL land clearly labeled as such.

The Department would like to submit the following comments on the above petition for State Land Use District Boundary Amendment:

1. DHHL understands that Pūlama Lāna‘i seeks the reclassification of the Petition Area from the Agricultural and Rural Districts to the Urban District in order to conform with the County of Maui’s Lāna‘i Community Plan and the proposed underlying zoning and Project District. DHHL also understands that the project district amendments increase the acreage in the Hotel sub-designation and create a new Resort Commercial sub-designation to provide for existing and future uses, and that the planned hotel expansion may include up to nine villas as an additional room option for guests at Sensei Lāna‘i, a Four Seasons Resort, approximately five spa hales and four Resort buildings (i.e., flex building, employee office and maintenance buildings). The Department also understands that the amendments to the Kō‘ele Project District ordinance reduce the overall density by decreasing the Residential and Multi-Family (sub-designations) acreage, increasing Open Space and Park acreage, and reducing Golf Course acreage and reduce the total acreage in the Project District by eight percent. DHHL is in favor of this reduction.
2. DHHL secured a potable water reservation on September 18, 2018 for the Leeward aquifer system of the Central aquifer sector in the amount of 0.067 mgd for its lands on Lāna‘i. DHHL appreciates that the Petitioner acknowledges DHHL’s water reservation and incorporates it into its water demand estimates for all water demand on Lāna‘i, including amendments to the Petition Area. DHHL understands that the new uses will result in a net increase of 0.13 mgd, that irrigation of Park and Hotel lands with effluent will be key in reducing potable water demand, and that the overall forecast of water demand at buildout, including DHHL’s water reservation, will be 1.96 mgd. DHHL finds this increase acceptable, as it is under the CWRM’s groundwater management guideline trigger of 4.3 MGD to initiate proceedings to designate Lāna‘i as a groundwater management area (Lāna‘i Water Use and Development Plan, 2011).
3. Per the DHHL Water Policy Plan (2014), the second priority goal of the DHHL and the Hawaiian Homes Commission is to “Aggressively, proactively, consistently and comprehensively advocate for the kuleana of the beneficiaries, the DHHL, and the HHC to water before all relevant agencies and entities.” This can be challenging to do when DHHL is not consulted during the environmental review process, then has to provide comments on the District Boundary Amendment Petition within the required timeframe. DHHL encourages the Petitioner to actively coordinate and consult directly with DHHL on an ongoing basis on water demand and water resource management.
4. DHHL supports the anticipated reduction in wastewater flows that the amendments to the Kō‘ele Project District will result in. DHHL encourages the Petitioner to actively coordinate and consult directly with DHHL on an ongoing basis on wastewater demand and management.

5. DHHL understands that the reduction in storm water runoff anticipated from the reduction in the area of developed land being proposed will have a positive impact to downstream environments, but still has concerns about any changes to stormwater management or drainage patterns resulting from changes to the Kō‘ele Project District that this Petition would facilitate, as our beneficiaries have reported that they have seen serious storm water impacts to the Kaiholena/Iwiolo/Paliamao drainageway during heavy rain events. DHHL encourages the Petitioner to actively coordinate and consult directly with DHHL on an ongoing basis regarding storm water management in the Kaiholena/Iwiolo/Paliamao watershed.
6. To reiterate and emphasize the need for better communication and coordination, DHHL encourages the Petitioner to actively coordinate and consult directly with DHHL on an ongoing basis regarding water, wastewater, stormwater management, and traffic, dust and noise mitigation, as both DHHL and the County of Maui are moving forward with their respective affordable housing initiatives at the same time as Pūlama Lāna‘i is seeking this DBA and moving forward with their resort expansion plans.

Mahalo for requesting comments from DHHL on this Petition for District Boundary Amendment. If you have any questions or need further information, please contact Lilliane Makaila, Acting Planning Program Manager, at Lilliane.k.makaila@hawaii.gov.

JOSH GREEN, M.D.
Governor

SYLVIA LUKE
Lt. Governor



State of Hawai'i
DEPARTMENT OF AGRICULTURE & BIOSECURITY
KA 'OIHANA MAHI'AI A KIA'I MEAOLA
1428 South King Street
Honolulu, Hawai'i 96814-2512
Phone: (808) 973-9560 FAX: (808) 973-9613

SHARON HURD
Chairperson
Board of Agriculture & Biosecurity

DEAN M. MATSUKAWA
Deputy to the Chairperson

May 28, 2026

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

Attn: Ms. Rachel Beasley, Planner

Dear Ms. Evans:

Subject: Petition to Amend the State Land Use District Boundaries
A26-812
Agricultural and Rural to Urban
Lanai Resorts, LLC (dba Pulama Lanai)
TMK: (2) 4-9-018: 003 (por.), 4-9-002: 061 (por.) and 4-9-002: 001 (por.)
Area: 170.225 acres (95.844 acres Agricultural; 74.381 acres Rural)
Lanai City, Lanai

The Department of Agriculture and Biosecurity (Department) has reviewed the subject petition and 16 exhibits and offers the following comments and recommendations that focus on the land and activities within the Agricultural District.

Background

The purpose of the requested reclassification is to align the State land use district designation with the Lanai Community Plan's Koele Project District. The Petitioner, Pulama Lanai, seeks to reclassify the subject properties from the Agricultural and Rural Districts (96.844 acres and 74.381 acres, respectively) to the Urban District. Plat 2, parcel 61 (mostly Rural and some Agricultural district) is located near the northern tip of Lanai City and abutting the western boundary of Sensei Lanai; plat 2, parcel 1 (all Rural District) abuts the northwestern boundary of Sensei Lanai; and plat 18, parcel 3 (nearly all Agricultural and a narrow, two-acre strip of Rural District) abuts the existing Urban District. The Department notes that most of plat 18, parcel 3 is the site of a golf course that has been unused since 2017.



OPSD Exhibit 4

Agricultural activity

The petitioned areas near Sensei Lanai and surrounding lands were cultivated in pineapple by Hawaiian Pineapple Company (Dole Food Company) until 1992 (Final Environmental Assessment, Volume II, Appendix B, Agricultural Impact Report, November 2021, page 10)) Department staff was unable to find visual evidence that the petitioned area comprised of plat 18, parcel 3 north of Lanai City was in pineapple cultivation (Agricultural Land Use Maps (1979-1980), Department of Agriculture and USDA Soil Conservation Service; also Detailed Land Classification – Island of Lanai, May 1967, Map 19).

Presently, there are about 75 acres in plat 2 parcel 61 that are used for pasturing animals that are an amenity for Sensei Lanai guests and additional pastureland and equine-related improvements (Petition, page 8).

The 2015 and 2020 Hawaii Statewide Agricultural Land Use Baseline reports show an increase to 95 acres from 54 acres of conventionally cropped diversified agriculture. This area of activity is located north of Lanai Airport and about 2.5 miles southwest of the petition area. Bananas and row crops are seen in satellite imagery. Northwest of this farming area and across Kaunapali Highway is Sensei Farms' greenhouses. Other than the aforementioned pastureland used to pasture animals that are part of Sensei Lanai's operations, there were no other identified agricultural uses on Lanai according to the Baseline reports.

Soils

Plat 18, parcel 3 is where most of the petitioned Agricultural District land is located. The predominant Overall Productivity Rating is "E" followed by "D". The Land Type for each indicates very poor to poor productivity potential for agricultural uses (Detailed Land Classification – Island of Lanai, Land Study Bureau Bulletin No. 8, May 1967, Maps 19, 13 and 14). The Agricultural Lands of Importance to the State of Hawaii (ALISH) system classifies about 50 percent of plat 18, parcel 3 as "Other Important" agricultural land and the remainder being not classified by ALISH (FEA, Volume II, Appendix B, Agricultural Impact Report, Figure 8, Agricultural Lands of Importance to the State of Hawaii). All pineapple cultivated land at the time the ALISH was mapped was classified as "Unique" agricultural lands because the fruit was grown without supplemental irrigation.

Conclusion

Based upon the information provided in the Petition and additional information found by Department staff, the Department finds that the reclassification of the approximately 95.8 acres of Agricultural District land will not adversely affect existing agricultural activities, resources, and farm workers as there are none, and is unlikely to adversely affect the establishment of potential agricultural operations on adjacent vacant agricultural lands.

Ms. Mary Alice Evans
May 28, 2026
Page 3

Sincerely,

A handwritten signature in black ink that reads "Sharon Hurd". The signature is written in a cursive, flowing style.

Sharon Hurd, Chairperson
Board of Agriculture and Biosecurity

c: Mr. Leo Asuncion, Administrator
Land Use Division
Office of Planning and Sustainable Development

Pulama Lanai district boundary amendment – Agricultural and Rural to Urban – 170.225
acres May 2026

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

KEITH A. REGAN
ACTING LIEUTENANT GOVERNOR
KA HOPE KIA'ĀINA KŪ WĀ



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

April 30, 2026

MEMORANDUM

FROM: ʻŌ:

DLNR Agencies:

- Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
- Div. of Boating & Ocean Recreation (richard.t.howard@hawaii.gov)
- Engineering Division (DLNR.ENGR@hawaii.gov)
- Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- Div. of State Parks (curt.a.cottrell@hawaii.gov)
- Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
- Land Division – Maui District (dlnr.land.maui@hawaii.gov)
- State Historic Preservation Division (SHPD) (jordan.v.calpito@hawaii.gov), (noah.gomes@hawaii.gov)
- Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

TO: FROM:

Seiji Ogawa, Land Administrator 

SUBJECT:

Request for review and comment on the State of Hawaii Land Use Commission consideration of A21-812 Pūlāma Lāna'i, Kō'ele Project State Land Use District Boundary Amendment (DBA) from Agriculture and Rural to Urban for approximately 170 acres adjacent to Lanai City

LOCATION:

(TMK): (2) 4-9-018:003 (por.), 4-9-002:061 (por.), and 4-9-002:001 (por.) Lāna'i City, Maui Nui, Hawai'i

APPLICANT:

State of Hawaii Office of Planning & Sustainable Development, applicants

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **May 27, 2026**. If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Raymond Severn at raymond.severn@hawaii.gov. Thank you.

BRIEF COMMENTS:

- We have no objections.
- We have no comments.
- We have no additional comments.
- Comments are included/attached.

Signed:

Print Name:

Dina U. Lau, Acting Chief Engineer

Division:

Engineering Division

Date:

May 26, 2026

Enclosures

cc: Central Files

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/Seiji Ogawa

**Ref: Request for review and comment on the State of Hawaii Land Use Commission consideration of A21-812 Pūlāma Lāna‘i, Kō‘ele Project State Land Use District Boundary Amendment (DBA) from Agriculture and Rural to Urban for approximately 170 acres adjacent to Lāna‘i City
TMK(s): (2) 4-9-018:003 (por.), 4-9-002:061(por.), and 4-9-002:001 (por.)
Location: Lāna‘i City, Maui Nui, Hawai‘i
Applicant: State of Hawaii Office of Planning & Sustainable Development**

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high-risk areas). Be advised that 44CFR, Chapter 1, Subchapter B, Part 60 reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible for researching the Flood Hazard Zone designation for the project. Flood zones subject to NFIP requirements are identified on FEMA’s Flood Insurance Rate Maps (FIRM). The official FIRMs can be accessed through FEMA’s Map Service Center (msc.fema.gov). Our Flood Hazard Assessment Tool (FHAT) (fhat.hawaii.gov) could also be used to research flood hazard information.

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7139.
- Kauai: County of Kauai, Department of Public Works (808) 241-4849.

Signed: 
DINA U. LAU, ACTING CHIEF ENGINEER

Date: May 26, 2026

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

May 27, 2026

EDWIN H. SNIFFEN
DIRECTOR
KA LUNA HO'OKELE

Deputy Directors
Nā Hope Luna Ho'okele
DREANALEE K. KALILI
TAMMY L. LEE
CURT T. OTAGURO
ROBIN K. SHISHIDO

IN REPLY REFER TO

DIR0003883
STP 8.4098

VIA EMAIL: rachel.e.beasley@hawaii.gov

TO: JAMES KUNANE TOKIOKA, DIRECTOR
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND
TOURISM

THROUGH: MARY ALICE EVANS, DIRECTOR
OFFICE OF PLANNING AND SUSTAINABLE DEVELOPMENT

FROM: EDWIN H. SNIFFEN *Ed H.*
DIRECTOR OF TRANSPORTATION

SUBJECT: A26-812 PULAMA LANAI, KOELE PROJECT DISTRICT
STATE LAND USE DISTRICT BOUNDARY AMENDMENT (DBA)
FOR APPROXIMATELY 170 ACRES
LANAI CITY, LANAI, HAWAII
TAX MAP KEY: (2) 4-9-018: 003 (PORTION); 4-9-002: 061
(PORTION), AND 4-9-002: 001 (PORTION)

Thank you for your letter, dated April 29, 2026, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject Petition. The HDOT understands that the Petitioner, Pulama Lanai, is seeking a DBA from the Agricultural and Rural Districts to the Urban District for approximately 170 acres of land within the Koele Project District on Lanai.

The HDOT has the following comments:

1. The proposed project area is approximately 2.52 miles from the property boundary of Lanai Airport (LNY). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.
2. The proposed project area is approximately 17,635 feet from the end of Runway 21 at LNY. Federal Aviation Administration (FAA) regulations require the submittal of FAA

Form 7460-1, Notice of Proposed Construction or Alteration, pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public-use or military airport that exceeds a 100:1 surface from any point on the runway of each airport, with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including the heights of temporary construction cranes, shall be included in the submittal. The form and submission criteria can be found at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>. Please provide a copy of the FAA response to the Part 77 analysis to the HDOT Airports Planning Section.

3. Due to the proximity to LNY, the developer should be aware of the proximity of the airport and potential single-event noise from aircraft operations. There is also potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. These impacts may increase or decrease over time and are dependent on airport operations.
4. The HDOT previously reviewed the subject project for a Draft Environmental Assessment and provided comments in a letter dated October 5, 2021 (see attached STP 8.3264). Our comments stated that the Traffic Assessment's (TA) use of the Lanai City Traffic Circulation Plan Traffic Study, dated October 1991, as the basis for "existing conditions," is no longer relevant to existing traffic conditions. The HDOT acknowledged that Pulama Lanai has completed traffic studies that would provide a more accurate basis for existing conditions on state highways. Within the subject project's current action, a revised TA was provided and has incorporated these traffic studies.
5. Based on the information in the revised TA, the HDOT does not anticipate adverse impacts on state highways. However, there is concern that the revised TA, dated December 2, 2021, may not be relevant to existing and projected traffic conditions by the time the project is ready for construction, as the development time frames have not been established in this application.
6. The HDOT acknowledges that the Project District Amendment is currently in Phase 1 of its three-phase process. Phase 2 involves developing a schematic plan for lands within the project district, and Phase 3 involves a detailed review of construction drawings to ensure consistency with Phase 2. Accordingly, if the subject application is conditionally approved, we recommend that the following conditions be included in Phase One approval:
 - a. Prior to Project District Amendment approval for Phase 2, the Petitioner shall provide an updated TA for the HDOT Highways review and approval.

- b. The updated TA should use up-to-date and relevant data for the existing traffic conditions and describe the projected changes based on the development plan for lands within the project district.
 - c. Assess the project's potential direct, secondary, and cumulative impacts on state roadways (including multimodal traffic) at full implementation of the project buildout. The cumulative impact section shall provide updates on Pulama Lanai's other development projects and other planned development projects, including their anticipated traffic impacts on state roadways, specifically at intersections with Lanai City roadways.
 - d. If the project construction is phased over multiple years, interim horizon years shall be analyzed for the completion of each phase.
 - e. If the qualitative TA suggests a potential for adverse impact to state roadways, the preparation of a Traffic Impact Analysis Report by a licensed professional engineer is required, with recommended mitigation, for the HDOT's review and approval.
7. The HDOT recommends the use of strategies to reduce carbon emissions from the project. Suggestions include:
- a. Incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions.
 - b. Implement energy-efficient technologies and practices, such as light-emitting diode lighting.
 - c. Use sustainable, recycled, or low-emission materials in construction and manufacturing.

Please submit any subsequent land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at DOT.LandUse@hawaii.gov.

If there are any questions, please contact Mr. Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Attachment

LEODOLOFF (LEO) R. ASUNCION, JR., AICP

P.O. Box 2359, Honolulu, HI 96804-2359 | +1 (808) 587-2846 | dbedt.op.lud@hawaii.gov

PROFESSIONAL SUMMARY

Results-driven executive leader with 30+ years of public-sector planning, regulatory, and administrative experience in Hawai'i. Proven ability to manage complex multi-stakeholder programs, grow operational budgets, and deliver landmark policy outcomes. AICP-certified with deep expertise in land use, coastal management, energy regulation, and strategic planning.

CORE COMPETENCIES

- Executive Leadership & Agency Management
- Stakeholder & Legislative Relations
- Strategic & Land Use Planning
- Program & Contract Management
- Regulatory Affairs & Policy Development
- Coastal Zone & Environmental Planning
- Budget Development & Fiscal Oversight
- GIS & Data Systems Analysis

PROFESSIONAL EXPERIENCE

Planning Program Administrator — Land Use Division

Nov. 2025 – Present

Office of Planning and Sustainable Development, State of Hawai'i

- Oversees all management, administration, and operations of the Land Use Division, including the Transit Oriented Development Program and the HUD-awarded PRO Housing grant.
- Directs division budgeting and statewide land use policy research.

Chairperson

Jul. 2022 – Nov. 2025

Commissioner

May 2019 – Nov. 2025

Hawai'i Public Utilities Commission

- Regulated all public utility companies in the State; approved rates, tariffs, and fees; and presided over public hearings, technical sessions, and contested case proceedings.
- Led completion of PUC's updated Case and Document Management System (CDMS) on budget.
- Initiated procurement capacity building, agency reorganization, and a mandated reliability-standards program not acted upon by prior Commissions.
- Oversaw annual agency budget development and staff restructuring to address new statutory responsibilities.

Director

Dec. 2015 – Dec. 2018

Interim Director

Mar. 2014 – Dec. 2015

Planning Program Administrator II

Jan. 2019 – Apr. 2019

Office of Planning, State of Hawai'i

- Managed all operations, budget, personnel (24 FTEs), procurement, and strategic direction of the Office of Planning.
- Grew the office's operational budget from \$3M to \$6M (2014–2018); represented the office before the Legislature, federal agencies, and Hawai'i's Congressional Delegation.
- Secured NOAA National Estuarine Research Reserve designation for He'eia (Jan. 2017); completed Phase I review of HRS Chapter 226 (Hawai'i State Planning Act).
- Completed the 2016–2020 Statewide Comprehensive Economic Development Strategy and the Kalihi 21st Century Transformation Initiative Vision Document.
- As Planning Program Administrator II: managed the Hawai'i Coastal Zone Management Program, GIS Program, and Special Plans Branch.

Planning Program Manager — Hawai'i CZM Program*Jun. 2011 – Dec. 2015**Office of Planning, State of Hawai'i*

- Managed the State's Coastal Zone Management Program, including budgeting, policy development, and federally approved strategy implementation.
- Led a comprehensive update of the Hawai'i Ocean Resources Management Plan (2013) — 80+ community meetings, on budget, ahead of schedule.
- Advanced long-stalled federal approval of the Coastal Non-Point Pollution Control Program; built program staff to full capacity, reducing lapsed federal funds.

Senior Regulatory Analyst*Apr. 2009 – Jun. 2011**Hawaiian Electric Company, Inc.*

- Led regulatory filings, written testimonies, and policy development before the Hawai'i PUC in the areas of Integrated Resource Planning, Energy Efficiency, and Renewable Energy.
- Developed the Company's new IRP-4 process (PUC-approved); established a pilot EV time-of-use rate and a Demand Response Program for private-sector customers.

Senior IRP Analyst*Aug. 2005 – Apr. 2009**Hawaiian Electric Company, Inc.*

- Managed the Integrated Resource Planning process for Maui Electric Co., Ltd., including 20-year long-range and 5-year action plans.
- Completed major IRP-3 update on time and on budget; coordinated 8–10 cross-functional team members and outside consultants.

Project Planner / Manager*Feb. 2002 – Jul. 2005**SSFM International, Inc.*

- Managed planning, permitting, EIS/EIA, and project management for \$25M+ portfolio of projects across Hawai'i, CNMI (Saipan), and the Republic of Palau.
- Clients included federal, state, and county agencies as well as private entities.

Planner*Oct. 1998 – Jan. 2002**Planning & Program Evaluation Division, Hawai'i State Judiciary*

- Provided planning and program evaluation support to the Office of the Administrative Director, judicial authorities, and affiliated agencies.
- Updated the Statewide Judiciary Security Plan; managed contracts between the Judiciary and the Dept. of Public Safety.

Staff Planner*Jan. 1992 – Oct. 1998**State Land Use Commission, DBEDT, State of Hawai'i*

- Supported the Land Use Commission in reviewing boundary amendment petitions, special permits, EIS documents, and county land use applications.
- Completed major amendments of the Commission's administrative rules.

EDUCATION

Master of Business Administration · <i>Hawai'i Pacific University</i>	2008
Master of Urban and Regional Planning · <i>University of Hawai'i – Mānoa</i>	1991
Bachelor of Arts, Political Science · <i>University of Hawai'i – Mānoa</i>	1988

PROFESSIONAL AFFILIATIONS & LEADERSHIP

▶ American Planning Association — National President	2021 – 2022
▶ APA National Board of Directors	2018 – 2023
▶ NARUC Board of Directors	2024 – 2025
▶ American Flood Coalition, Executive Advisory Board	2020 – Present
▶ Coastal States Organization — Chair / Vice Chair	2014 – 2018 (Chair 2016–2018)
▶ National Ocean Council Governance Coordinating Committee, Co-Chair	2015 – 2016
▶ Lambda Alpha International, Member	2017 – Present
▶ American Institute of Certified Planners (AICP)	July 1994 – Present
▶ American Planning Association, National & Hawai'i Chapters	September 1988 – Present
▶ University of Hawai'i Alumni Association, Life Member	1992 – Present

Rachel Beasley

rachel.beasley@gmail.com | Kailua, HI | 808-202-1907

Education

Miami University, Oxford, OH, Bachelor of Arts in International Studies
University of New Orleans, New Orleans, LA, Master in Urban and Regional Planning

Experience

State of Hawaii | Planner V | Honolulu, HI | November 2023 - Present

Office of Planning and Sustainable Development (OPSD), Land Use Division (LUD) and Coastal Zone Management (CZM)

- Review, analyze, and process land use petitions to ensure regulatory conformance and prepare recommendations. (LUD)
- Support the Transit Oriented Development (TOD) Council by managing TOD CIP project timelines and deliverables, coordinating legislative activities and tracking bills, and serving as a liaison to provide technical and organizational support to counties. (LUD)
- Conduct detailed analysis of permit applications and environmental assessments and prepare clear and concise comment letters reflecting regulatory requirements and agency position. (LUD and CZM)
- Managed projects that support the OPSD's Ocean Resources and Management Plan. (CZM)
- Organized and lead county planning meetings for peer-to-peer discussion across counties with regard to SMA trends and permitting. (CZM)
- Coordinated public posting of SMA minor permits as required by HRS Chapter 205A-30. (CZM)
- Organized and managed the completion of the National Oceanic and Atmospheric Administration's (NOAA) Fiscal Year 2026-2030 Assessment and Strategy document. (CZM)
- Serve as the Department of Business, Economic Development & Tourism's (DBEDT) representative member on the Hawaii Invasive Species Committee (HISC) Resources Working Group. (LUD AND CZM)

County of Maui | Planner V | Wailuku, HI | December 2022 - Present

Coastal Zone Management Program

- Reviewed and administered County Special Management Area permits and shoreline setback provisions under the Hawaii Coastal Zone Management Law.
- Provided guidance on projects in the shoreline area regarding sea level rise and shoreline solutions.
- Managed and reviewed permit applications; composed staff reports with recommendations and presented to the Maui County Planning Commission.
- Collaborated on and reviewed projects regarding shoreline solutions for eroding beaches.

State of Hawaii | Planner V | Honolulu, HI | May 2019 - December 2022

The Office of Conservation and Coastal Land is a regulatory entity that oversees approximately 2 million acres of private and public lands in the state's conservation district as well as overseeing beach and marine lands.

- Reviewed, researched, and analyzed conservation land use permit applications.

- Wrote staff reports for applications and recommend approval, denial, or modification of land use requests.
- Advised planning officials and the public on project compatibility, cost-effectiveness, and regulatory conformance. Provided timely responses and guidance for proposed projects.
- Confirmed and tracked projects for compliance with historic preservation (Hawaii Revised Statute 6E process and Section 106 of the National Historic Preservation Act) and environmental review (Hawaii Environmental Process and National Environmental Policy Act)

Belt Collins Hawaii LLC | Planner | Honolulu, HI | December 2017 - May 2019

- Facilitated the community planning process as the community outreach project manager for the “Complete Streets” projects. Conducted stakeholder and community outreach via MailChimp/phone/in-person to ensure comprehensive community engagement. Engaged weekly with the client (County) to make sure project goals were met and to provide feedback. Created and coordinated surveys via SurveyMonkey and Microsoft Word to ascertain community feedback on project objectives. Created a community input matrix in order to organize, pinpoint, and respond with accuracy to categorized community feedback.
- Researched, drafted, wrote environmental assessments pursuant to the Hawaii Environmental Process (HEPA), Hawaii Administrative Rules Chapter 11-200.1.
 - Researched and interviewed stakeholders for the Transit Oriented Development (TOD) projects along the new rail stations. Researched land use ownership around rail stations and interviewed landowners regarding development plans. Evaluated sustainable economic development, specific to Hawaii, along the rail.

Collier County Planning Department | Planner | Naples, FL | April 2015 - June 2017 *The Zoning Services Section of the Growth Management Department administers the County’s zoning code, provides assistance to the public, processes zoning petitions and reviews plan conformance.*

- Processed and managed zoning petitions. Consulted and advised applicants on proposed land use. Reviewed and researched applications to the County’s land development code. Composed and presented petition recommendations to the County Planning Board.
- Answered public inquiry questions in a timely manner. Provided feedback to land use questions that ensured the county’s natural and built environments adhered to the community’s vision as expressed in the Land Development Code, Growth Management Plan, and other planning documents.
- Served as the county’s liaison with the Historic and Archaeological Preservation Board. Organized and attended meetings to ensure the Board heard, discussed, and acted upon items consistent with their mission statement to protect, preserve, and perpetuate the county’s historic and archaeological artifacts, sites, districts, buildings, and properties.
- Served as committee review member to the HUD Ranking and Review Committee for CDBG and Home Funding. Reviewed proposals and made recommendations for project funding allocation based on applicants’ proposals.