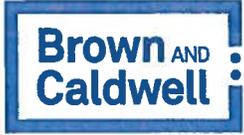


1955 Main Street, Suite 200
Wailuku, HI 96793

T: 808.244.7005
F: 808.244.9026



August 25, 2015

Mr. Bill Frampton and Mr. Dave Ward
Olowalu Town, LLC
2035 Main Street, Suite No. 1
Wailuku, Hawaii 96793

143089.001

Subject: Olowalu Town Wastewater Management Plan Report (Dated October, 2011)
and Olowalu Town Stormwater Quality Enhancements Report (Dated October,
2011)

Dear Mr. Frampton and Mr. Ward:

At your request, Brown and Caldwell prepared the subject reports for inclusion in the Olowalu Town Master Plan Environmental Impact Statement. Both reports addressed Alternative 1, the Preferred Alternative. With the adoption of the Maui Island Plan (MIP) in December 2012, Alternative 2 was introduced as a second alternative within the realm of implementation potential. Alternative 2 reflects a master plan concept which follows the MIP's growth boundaries. That is, lands makai of Honoapiilani Highway are not included as part of the Master Plan. Both Alternatives 1 and 2 call for the development of up to 1,500 residential units and between 300,000 to 375,000 square feet of commercial space.

The Stormwater Quality Enhancement Report identifies Best Management Practices (BMPs) that will support Olowalu Town's sustainability objectives, including residential BMPs, commercial and public facility BMPs, and green space/recreational area BMPs. The BMPs identified in our report are state-of-the-art recommendations which continue to be valid and appropriate today, as they were in 2011. The BMPs would apply equally to both Alternative 1 and Alternative 2.

Similarly, the Wastewater Management Plan's analysis and recommendations, including our discussion on the proposed wastewater treatment plant facility and processes remain current in terms of technology and design parameters. The engineering elements of the wastewater treatment facility would serve both Alternative 1 and Alternative 2 in the same capacity with equal results.

No new circumstances have arisen with respect to the subject project or property that will result in different or likely increased environmental impacts not previously dealt with in our 2011 reports. Accordingly, we confirm that the analysis, conclusions, and recommendations presented in the foregoing reports remain applicable and are valid for both Alternative 1 and Alternative 2.

Mr. Bill Frampton and Mr. Dave Ward
Olowalu Town, LLC
August 25, 2015
Page 2

Very truly yours,

Brown and Caldwell



Craig C. Lekven, P.E.
Supervising Engineer
Project Manager

CCL:ic

cc: Colleen Suyama, Munekiyo Hiraga