

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director



COUNTY OF MAUI
DEPARTMENT OF PLANNING

November 2, 2017

MEMORANDUM

TO: Daniel Orodener
Executive Director
Land Use Commission
State of Hawaii
P. O. Box 2359
Honolulu, Hawaii 96804

FROM: William Spence, Planning Director

SUBJECT: DOCKET NO. A15-798 / WAIKAPU PROPERTIES, LLC

TRANSMITTED ARE THE FOLLOWING:

COPIES	DATE	DESCRIPTION
Original	11/02/17	List of Exhibits (Exhibit 3 Submitted)
Original	11/02/17	Testimony Statement, Department of Planning, County of Maui, In Petitioner's Motion to Amend Land Use District Boundaries for Waikapu Properties, LLC Project
Original	11/02/17	Certificate of Service

- () For your information & files
() For approval & signature
() Per your request
- () For your review and approval
() See REMARKS below
(X) For filing

Attachments
WRS:KFW:lk
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Statement\LUC_Transmittal_Sheet_Testimony.doc

DOCKET NO./PETITIONER: A15-798 / WAIKAPU PROPERTIES, LLC

PARTY: COUNTY OF MAUI

LIST OF EXHIBITS DATED NOVEMBER 2, 2017

EXHIBIT NUMBER	DESCRIPTION	PARTY: OBJECTIONS	ADMIT
1	Applicable Sections of Maui Island Plan Relating to Petition (Previously Submitted)		
2	Resume for William Spence, Director, Department of Planning, County of Maui (Previously Submitted)		
3	Testimony of the Maui Department of Planning, William Spence, Director		
4	Resume for David Goode, Director, Public Works Department, County of Maui (Previously Submitted)		

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DEPARTMENT OF PLANNING
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BEFORE THE LAND USE COMMISSION
 OF THE STATE OF HAWAII

In the Matter of the Petition of:)	Docket No. A15-798
)	
WAIKAPU PROPERTIES, LLC; MTP)	WRITTEN TESTIMONY OF
LAND PARTNERS, LLC; WILLIAM S.)	PLANNING DIRECTOR
FILIOS, Trustee of the William)	WILLIAM SPENCE ON BEHALF
S. Filios Separate Property)	OF THE DEPARTMENT OF PLANNING
Trust dated APRIL 3, 2000; and)	COUNTY OF MAUI
WAIKALE 905 PARTNERS, LLC,)	
)	
To Amend the Agricultural Land Use District)	
Boundaries into the Rural Land Use District)	
for certain lands sited at Waikapu, District)	
of Wailuku, Island and County of Maui,)	
State of Hawaii, consisting of 92.394 acres)	
and 57.454 acres, bearing Tax Map Key)	
No. (2) 3-6-004:003 (por) and to Amend the)	
Agricultural Land Use District Boundaries)	
into the Urban Land Use District for certain)	
lands situate at Waikapu, District of)	
Wailuku, Island and County of Maui,)	
State of Hawaii, consisting of 236.326 acres,)	
53.775 acres, and 45.054 acres, bearing)	
Tax Map Key No. (2) 3-6-002:003 (por),)	
(2) 3-6-004:006 and (2) 3-6-005:007 (por).)	

**WRITTEN TESTIMONY OF PLANNING DIRECTOR WILLIAM SPENCE ON
 BEHALF OF THE DEPARTMENT OF PLANNING,
 COUNTY OF MAUI**

In accordance with §15-15-55 of the State Land Use Commission Rules, the Department of Planning, County of Maui, (hereinafter referred to as "Department") supports, subject to conditions, the State Land Use District Boundary Amendment filed by Waikapu Properties, LLC, MTP Land Partners, LLC; and William S. Filios, Trustee of the William S. Filios Separate Property Trust (hereinafter referred to as the "Petitioner") to reclassify approximately 253.05 acres at Maui Tax Map Key Nos. (2) 2-2:024:016 and 017, and (2) 2-2-002:084 (por.) (hereinafter referred to as the "Petition

Area”) from the Agricultural Land Use District to the Urban Land Use District at Kihei, Island of Maui, Hawaii. The State Land Use Commission’s primary mission in this case is to determine if the lands under question are appropriate for redesignation from agricultural use to urban and rural uses. The specific details of the project will be reviewed by the County of Maui.

It should be noted that descriptions and analysis in this testimony reference details from the *Final Environmental Impact Statement Waikapu Country Town* (“EIS”), December, 2016, prepared for the Petitioner by Planning Consultants Hawaii, LLC. On January 18, 2017, the Final Environmental Impact Statement was accepted by the State Land Use Commission (“Commission”).

Petitioner’s Proposed Use of the Property

The Petitioner is proposing to amend the land use district boundaries of certain lands consisting of about 149.848 acres within Tax Map Key No. (2) 3-6-004:003 (por), from State Land Use Agricultural District to State Land Use Rural District and to amend the land use district boundaries of certain lands consisting of about 335.155 acres within Tax Map Key No. (2) 3-6-002:003 (por), (2) 3-6-004:006 and (2) 3-6-005:007 (por) from the Agricultural District to the State Land Use Urban District. All of the lands which consist of about 485.003 acres are referred to as the Petition Area. The Petition Area surrounds a 14 acre parcel which was placed in the Urban District by the Maui County Council in October of 1992. The Petitioner is proposing to develop a new residential mixed-use community on lands in and around the Maui Tropical Plantation which is just south of Waikapu, Maui and located in the Wailuku-Kahului Community Plan Area. The proposed project will encompass 499.003 acres of land to be used for urban and rural development. Approximately 1,077.168 acres (owned by the applicant and surrounding the Petition Area) will remain in agricultural use and about 800 acres of this land will be placed into an agricultural conservation easement. The project area is within the Maui Island Plan’s Small Town Growth Boundary and is identified as the “Tropical Town Planned Growth Area.” The Maui Island Plan allocated 1,433 residential units and supports commercial and civic uses to the Tropical Town Planned Growth Area.

Applicable Regulations

Standards for reviewing a Land Use Commission Urban District Boundary Amendment are found under Title 15, Subtitle 3 State Land Use Commission, Chapter 15 Land Use Commission Rules, Subchapter 2, §15-15-18 of the Hawaii Administrative Rules as follows:

- (1) It shall include lands characterized by "city-like" concentrations of people, structures, streets, urban level of services and other related land uses;
- (2) It shall take into consideration the following specific factors:
 - (A) Proximity to centers of trading and employment except where the development would generate new centers of trading and employment;
 - (B) Availability of basic services such as schools, parks, wastewater systems, solid waste disposal, drainage, water, transportation systems, public utilities, and police and fire protection; and
 - (C) Sufficient reserve areas for foreseeable urban growth;
- (3) It shall include lands with satisfactory topography, drainage and reasonably free from the danger of floods, tsunami, unstable soil condition, and other adverse environmental effects;
- (4) Land contiguous with existing urban areas shall be given more consideration than non-contiguous land, and particularly when indicated for future urban use on state or county general plans;

- (5) It shall include lands in appropriate locations for new urban concentrations and shall give consideration to areas of urban growth as shown on the state and county general plans;
- (6) It may include lands which do not conform to the standards in paragraphs (1) to (5):
 - (A) When surrounded by or adjacent to existing urban development; and
 - (B) Only when those lands represent a minor portion of this district;
- (7) It shall not include lands, the urbanization of which will contribute toward scattered spot urban development, necessitating unreasonable investment in public infrastructure or support services; and
- (8) It may include lands with a general slope of twenty percent or more if the commission finds that those lands are desirable and suitable for urban purposes and that the design and construction controls, as adopted by any federal, state, or county agency, are adequate to protect the public health, welfare and safety, and the public's interests in the aesthetic quality of the landscape.

Pursuant to §15-15-77 Decision-making criteria for boundary amendments:

- (a) The commission shall not approve an amendment of a land use district boundary unless the commission finds upon the clear preponderance of the evidence that the proposed boundary amendment is reasonable, not violative of section 205-2, HRS, and consistent with the policies and criteria established pursuant to sections 205-16, 205-17, and 205A-2, HRS.
- (b) In its review of any petition for reclassification of district boundaries pursuant to this chapter, the commission shall specifically consider the following:
 - (1) The extent to which the proposed reclassification conforms to the applicable goals, objectives, and policies of the Hawaii state plan and relates to the applicable priority guidelines of the Hawaii state plan and the adopted functional plans;
 - (2) The extent to which the proposed reclassification conforms to the applicable district standards;
 - (3) The impact of the proposed reclassification on the following areas of state concern:
 - (A) Preservation or maintenance of important natural systems or habitats;
 - (B) Maintenance of valued cultural, historical, or natural resources;
 - (C) Maintenance of other natural resources relevant to Hawaii's economy including, but not limited to agricultural resources;
 - (D) Commitment of state funds and resources;
 - (E) Provisions for employment opportunities and economic development; and
 - (F) Provision for housing opportunities for all income groups, particularly the low, low-moderate, and gap groups;
 - (4) In establishing the boundaries of the districts in each county, the commission shall give consideration to the general plan of the county in which the land is located;
 - (5) The representations and commitments made by the petitioner in securing a boundary change, including a finding that the petitioner has the necessary economic ability to carry out the representations and commitments relating to the proposed use or development; and
 - (6) Lands in intensive agricultural use for two years prior to date of filing of a

petition or lands with a high capacity for intensive agricultural use shall not be taken out of the agricultural district unless the commission finds either that the action:

- (A) Will not substantially impair actual or potential agricultural production in the vicinity of the subject property or in the county or State; or
- (B) Is reasonably necessary for urban growth.

Land Use

The Petition Area is zoned Agricultural and Project District and designated Agriculture and Project District in the Wailuku-Kahului Community Plan. As such, the proposed mixed-use is inconsistent with the land use designation in the Community Plan and with County Zoning. Consequently, the Applicant submitted to the County of Maui applications for the Community Plan Amendment (CPA), Change of Zoning (CIZ), and Project District (PD). The CIZ and CPA and PD applications are being held in abeyance by the County until such time as the LUC renders its decision on the District Boundary Amendment Petition. There is also a State Land Use Commission Special Permit for the proposed wastewater facility to be located in the Agricultural District which will be a project less than 15 acres and subject to review by the County of Maui. In reviewing this project, the Department has consistently supported the application and anticipates continuing to do so as the application progresses through both the LUC and County of Maui. The Maui Island Plan specifically designated the Petition Area within the planned growth area, and the subject property was placed within the Urban and Rural Growth Boundaries.

Maui Island Plan. Particularly important in reviewing this Petition is the "story" of the proposed development outlined in the Maui Island Plan adopted by the Maui County Council and stated as follows:

"Waikapu Tropical Plantation Town. The Waikapu Tropical Plantation Town planned growth area is situated in the vicinity of the Maui Tropical Plantation, and includes lands on both the mauka and Makai side of Honoapiilani Highway. Providing the urban character of a traditional small town, this area will have a mix of single-family and multi-family rural residences, park land, open space, commercial uses, and an elementary or intermediate school developed in coordination with the Waiale project. The area is located south of Waikapu along Honoapiilani Highway, and it will incorporate the integrated agricultural and commercial uses of the existing tropical plantation complex. This area is proximate to the Waiale planned growth area, providing additional housing in central Maui within the Wailuku-Kahului Community plan region. As part of this project, parcels to the south of the project shall be protected in perpetuity for agricultural use through a conservation easement. A portion of this area may be dedicated to the County as an agricultural park administered pursuant to County regulations. Alternatively, this area can be developed as a private agricultural park available to Maui farmers, and executed through a unilateral agreement between the landowner and Maui County. The rural lots mauka of Honoapiilani Highway area intended to be developed using a Conservation Subdivision Design (CSD) plan. The CSD plan shall provide access to uninterrupted walking and bicycling trails and will preserve mauka and makai views while protecting environmentally sensitive lands both along Waikapu Stream and mauka of the subdivision.

Planned Growth Area Rationale. Keeping the Waikapu Tropical Plantation as its town core, this area will become a self-sufficient small town with a mix of single-family and multi-family housing units in a walkable community that includes affordable housing in close proximity to Wailuku's employment centers. Schools, parks, police and fire facilities, transit infrastructure, wastewater, water supply resources, and other infrastructure should be developed efficiently, in coordination with

neighboring developments including Maui Lani, Kehalani, Puunani and Waiale.”

Along with this narrative, planning guidelines in the Maui Island Plan call out 1,433 dwelling units with a balance of single-family and multi-family structures. Ohana units do not count towards the total units; however, in the Final EIS on page I-31 the Petitioner states *“The WCT proposes the development of approximately 1,433 residential dwelling units, plus the potential for up to 146 Ohana units.”* Should the Petitioner wish to build more than 146 ohana units, consideration would need to be given to potential impacts of a more intense development.

Wailuku-Kahului Community Plan. A Community Plan Amendment will be sought from the County of Maui to bring those portions of the project site slated for development as well as existing Waikapu Town properties included in Wailuku-Kahului Project District 5 into a new consolidated Project District.

Change of Zoning and Project District. Likewise, the WCT master plan will require a Change of Zoning for all lands proposed for development. A new project district zoning ordinance likely will be created to implement the vision and mix of uses proposed for Waikapu Town; however, the County of Maui is in the process of reviewing its Zoning Code and the Project District Zoning procedure. If a future, revised Maui County Code provides for a flexible mixed-use planning process different from that of the current Project District designation, the Applicant may pursue this new, more flexible and comprehensive alternative. In addition, the proposed Change of Zoning needs to meet the following guidelines:

- The proposed request meets the intent of the General Plan and the objectives and policies of the community plan of the County.
- The proposed request is consistent with the applicable community plan land use map of the County.
- The proposed request meets the intent and purposed of the district being requested.
- The application, if granted, would not adversely affect or interfere with public or private schools, parks, playgrounds, water systems, sewage, and solid waste disposal, drainage, roadway and transportation systems, or other public requirements, conveniences, and improvements.
- The application, if granted, would not adversely impact the social, cultural, economic, environmental and ecological character and quality of the surrounding area.
- If a Change of Zoning application involves the establishment of an agricultural district with a minimum lot size of two acres, an agricultural feasibility study shall be required and reviewed by the Department of Agriculture and the U.S. Soil Conservation Service.

In reviewing the approved Final EIS for this project, the Department notes and concurs with the detail of *Chapter VII, Relationship to Governmental Plans, Policies, and Controls* with regards to WCT described in pages VII-1 to VII-349 of the Final EIS.

Issues of Importance to the County of Maui

The following summarizes key County of Maui concerns regarding this project. Of course the project as a whole directly impacts the County of Maui and enforcement of conditions whether generated from deliberations from the State Land Use Commission or from the Maui County Council

often become the obligation of the County. Redundancies and overlaps in governing agencies become problematic in balancing conditions more appropriate for the District Boundary Amendment or more applicable for the Change of Zoning review by the County of Maui. Roadways, drainage, affordable housing, archaeological monitoring, cultural issues, wastewater management, building design, project layout and alternative multi-modal transportation, schools, water management, and other areas are vital in reviewing this project, and these areas have been covered in considerable depth in the Final Environmental Impact Statement and will continue to be reviewed during the comprehensive State and County permitting process.

Particular items include:

- The location and permitting of the private wastewater treatment plant within the agricultural zoning area will require the review and approval by the Maui Planning Commission of a Land Use Commission Special Permit for the operation of the utility on a property less than 15 acres.
- The development and maintenance of a private water system with potable and non-potable water lines and coordination with the State Department of Health.
- The coordination and timing of improvements to the State and County roadway system integrated with a Memorandum of Understanding and/or Master Roadway Agreement with State and County agencies.
- The final approval of an Archaeological Inventory Survey (AIS) and coordinated Archaeological Monitoring Plan.
- Clear project phasing along with infrastructure development planning and timing of a range of housing products including the development of the required "affordable" housing component as coordinated with the Department of Housing and Human Concerns.
- The dedication of approximately 800 acres of land adjacent to the Petition area to agricultural use in perpetuity.
- Appropriate mitigation and coordination with the US Fish and Wildlife Service with regard specifically to the Blackburn's Sphinx Moth's habitat and the incorporation of mitigation measures such as downward shielding of outdoor night lighting to protect birds.
- The development of a multi-modal transportation system within the project area including a walking path/bicycle path system.
- Continuing discussions with the County of Maui regarding the timing and financing of construction for the Waiale Bypass Road.

POSITION OF THE DEPARTMENT OF PLANNING, COUNTY OF MAUI

Based on our review of the information provided in the Petition, the Department of Planning finds that the proposed reclassification to the State Land Use Urban District and State Rural District is consistent with the standards for determining Urban District boundaries as set forth in the LUC's Rules. The County reserves its right to further clarify its position, present witnesses and evidence

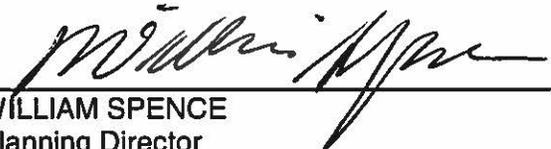
and to propose conditions. The reclassification would also conform to the Maui Island Plan, which was adopted by the Maui County Council by Ordinance No. 4004, effective as of December 28, 2012. The Planning Department supports this Petition for a District Boundary Amendment to provide their requested Urban and Rural District designations. Suggested conditions include:

1. That the Petitioner shall develop the project in substantial compliance with the Planned Growth Area Rationale and goals, objectives, policies, and implementing actions described in the Maui Island Plan for the project known as the Waikapu Tropical Plantation Town.
2. That the Petitioner shall provide the necessary water source, storage and transmission facilities and improvements to the satisfaction of the State Department of Health as the proposal is for a private water system and to the satisfaction as may be applicable to the County of Maui's Department of Water Supply to service the petition areas. And that the Petitioner work with the State Commission on Water Resources Management regarding the overall impact of water pumpage from wells.
3. That the Petitioner shall implement water conservation and best management practices in the design and construction of the petition area.
4. That the Petitioner shall construct drainage improvements to accommodate the development of the petition area in accordance with the requirements of the County of Maui's Department of Public Works.
5. That the Petitioner shall fund, construct, and implement roadway improvements to accommodate the development of the petition area in accordance with the requirements of the County of Maui's Department of Public Works and memorialize the timeline of traffic improvements with development milestones in a Master Roadway Agreement.
6. That the Petitioner shall continue to work with the Department of Public Works and other adjacent developers on a timetable for the construction of the Waiale Bypass.
7. That the Petitioner shall consider working with adjacent developers of Waiale, Maui Lani, Kehalani, and other developments as applicable along with appropriate County and State agencies including Maui County's Metropolitan Planning Organization (MPO) to develop a comprehensive traffic review of this Central Maui region.
8. That the Petitioner shall fund, construct, and implement all transportation improvements and measures required to mitigate impacts to state roadway facilities caused by the Project as set forth in a Memorandum of Agreement ("MOA") agreed to and executed by the DOT and the Petitioner. The MOA shall include, but not be limited to, the following terms and conditions: (i) Petitioner's responsibilities for funding, construction, and implementation of improvements and mitigation; (ii) a schedule of agreed to improvements and a schedule for future TIAR updates or revisions to be accepted by DOT; (iii) development of the Project shall be consistent with the executed MOA and TIAR; and (iv) any fees or in-kind contribution that is roughly proportional to any indirect or secondary impacts caused by the Project.
9. That the Petitioner shall comply with the requirements of the County Department of Environmental Management and/or State Department of Health as applicable.

10. That the Petitioner shall comply with the Parks Dedication requirements of the County of Maui as approved by the Director of Parks and Recreation.
11. That the Petitioner shall comply with all affordable housing requirements of the County of Maui to the satisfaction of the Department of Housing and Human Concerns.
12. That the Petitioner shall complete construction of the proposed backbone infrastructure for Phase 1 of the Project (See Figure 27: Conceptual Phasing Plan in the Final EIS), which consists of primary roadways and access points, internal roadways, on- and offsite water and electrical system improvements, and stormwater/drainage and other utility system improvements within ten (10) years of the date of the Decision and Order approving the Petition.
13. In the event that historic resources, including skeletal remains, are identified during construction activities, all work shall cease in the immediate vicinity of the find, the find shall be protected from additional disturbance, and the Department of Land and Natural Resources, State Historic Preservation Division, Maui Island Section, shall be contacted immediately.
14. That the Petitioner shall develop mitigation measures to address any potential impacts on endangered species in the Petition area and shall as necessary consult with the DLNR, DOFAW, and USFWS to develop such mitigation measures.
15. For all land in the Petition Area or any portion thereof that is adjacent to land within the State Land Use Agricultural District, Petitioner shall comply with the following:
 - A. Petitioner and its successors and assigns shall not take any action that would interfere with or restrain farming operations conducted in a manner consistent with generally accepted agricultural and management principles on adjacent or contiguous lands in the State Agricultural District. For the purpose of these conditions, "farming operations" shall have the same meaning as provided in HRS section 165-2; and
 - B. Petitioner shall notify all prospective developers or purchasers of land or interest in land in the Petition Area, and provide or require subsequent notice to lessees or tenants of the land, that farming operations and practices on adjacent or contiguous land in the State Agricultural District are protected under HRS chapter 165, the Hawaii Right to Farm Act. The notice shall disclose to all prospective buyers, tenants, or lessees of the Petition Area that potential nuisances from noise, odors, dust, fumes, spray, smoke, or vibration may result from agricultural uses on adjacent lands. The notice shall be included in any disclosure required for the sale or transfer of real property or any interest in real property.
16. Pursuant to Article XII, section 7, of the Hawaii State Constitution, Petitioner shall preserve any established access rights of Native Hawaiians who have customarily and traditionally used the Petition Area to exercise subsistence, cultural, and religious practices, or for access to other areas.
17. That the Petitioner shall have an Archaeological Monitoring Plan detailing the localities to undergo monitoring procedures reviewed and accepted by State Historic Preservation Division prior to commencement of ground altering construction.

18. That the Petitioner shall submit an application to the County of Maui for a Land Use Commission Special Permit for the construction and location of the private wastewater disposal treatment center to be located in the State and County Agricultural Districts on less than 15 acres.

DATED: Wailuku, Hawaii, November 2, 2017.


WILLIAM SPENCE
Planning Director
Department of Planning

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OF THE STATE OF HAWAII**

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following on the date indicated below:

DANIEL E. ORODENKER
Executive Director
State of Hawaii Land Use Commission
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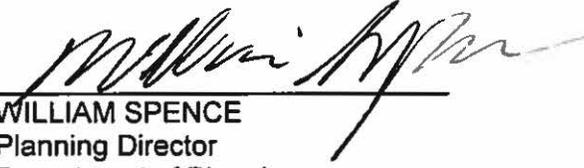
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Hand Delivery

DATED: Wailuku, Hawaii, November 2, 2017.


WILLIAM SPENCE
Planning Director
Department of Planning