

To: State Land Use Commission
PO Box 2359
Honolulu, HI 96804
Attention: Dan Ordonecker

Nov. 18, 2015

From: Sierra Club Maui Group
PO Box 791180
Paia, HI 96708

Re: FEIS Olowalu Town **A10-786**

Aloha LUC Members and Staff

Sierra Club Maui has followed the efforts to urbanize the historically and culturally significant lands of Olowalu since 1999.

The ownership of the land has been consistent in promising one thing and delivering another. The current FEIS before you does not meet the standards of HAR 11-200 which specifies EIS contents : “shall **fully declare** the environmental implications of the proposed action and shall discuss all relevant and feasible consequences of the action”. It does not allow the public to be “fully informed” or the agency to “make a sound decision.” We agree with the State Office of Planning that the FEIS should not be accepted and urge you to act accordingly.

The basis tone of the FEIS is that the project will be done perfectly and therefore there will be no significant impacts. The reality is that Olowalu is a very sensitive location, which has been long inhabited due to the richness of the soil, the sea and the available water. Past attempts at urbanization (Olowalu Plantation) in the 19th and 20th century were short-lived.

The present FEIS describes a plan that gives lip service to the ahupua'a, then proposes to repurpose 80% of the prime ag land with dense development. The FEIS reveals no impacts from that action since it assures us the agriculture is changing to be less land based.

The FEIS informs us, with little factual basis, that the development will “improve conditions in ocean water quality and on the reefs” through a complex set BMP's and design standards that may or may not ever happen and whose costs are currently unknown. the FEIS does not discuss the likelihood that ongoing costs will be born by future residents of the proposed “affordable” community.”

And then there is the water. The FEIS never fully describes why nearly a million gallons of Olowalu Stream water a day is currently being diverted from state land, with no current diversion license, and being used to supply a private irrigation company with less than 30 paying customers. You do the math? The FEIS does refer to current ag usage at 50,000 gpd. That's a far cry from the 900,000 gpd that is diverted into Olowalu Irrigation Co. reservoirs. Where does that water go?

The FEIS sidesteps any description of how the leaking Olowalu ditch and reservoir system is impacting the viability of the stream to have mauka -makai flows, and in effect wasting water protected under the state water code. It gives lip service to idea of stream restoration that is a priority issue in Cultural Impact Assessment interviews, but does not describe at what level the flows will be restored, only that things will be “improved” by repairing a section of ditch that is now leaking about 1 mgd of diverted stream water back into the stream.

Then the FEIS then assures us that when Olowalu Town is developed, things will improve, because only .39 mgd of stream water will be needed and other irrigation needs will be supplied by R-1 water from a new sewage treatment plant. Unfortunately, the FEIS does not really openly discuss that the proposed 150-225 larger rural lots and 20 large ag lots are not utilizing the sewage treatment plant. This is buried in the fine print. There is not clear information available that until the treatment plant is built and R-1 water is available in sufficient quantities, stream water will be used for irrigation.

If these large lots are developed first, and the FEIS does not include a lot of details on project phasing, but these are the more expensive lots, then their more robust irrigation needs will be served by stream water. How much? The

FEIS does not break it out, but the nearest figure is around 500 gpd.

The FEIS never mentions any figure for kuleana use of stream water, and acknowledges in response to public comments, that it has no idea how much stream water is currently being used by kuleana users or if there is additional need that is not met.

Similarly, the information available in the FEIS concerning ground water demands and effects of extensive groundwater pumping of two new wells is not sufficient. The FEIS acknowledges that the project's current well has very limited demand (average of 55,000 gpd) but then does not conclude that the FEIS needs to include more extensive testing of that well to see if its output can reliably increase 10 fold. The FEIS refers to additional wells being spaced throughout the aquifer. Maps in the FEIS show the existing and proposed wells in a line along the Olowalu stream. While the Olowalu aquifer spans over 600 acres, these wells are clustered in what would appear to be less than 20 acres. The rationale for this "spacing" and its effectiveness in protecting the aquifer is never discussed in the FEIS.

The FEIS refuses to consider that the introduction of two new wells and boosted pumping at the existing wells could have any effect on the underground flows that supply the Olowalu stream. Their consultant is sure that the two are and will remain completely unconnected, although the well water and stream water above the diversion appear to have a very similar chemical profile.

The FEIS concludes the existing and new wells will draw from a deeper source than plantation wells and have minimal effects on the transport of groundwater that naturally takes place under current conditions. Cultural practitioners have concerns that new wells pumping half the 2 mgd capacity or more of the Olowalu aquifer could irrevocably alter the fresh water discharge that is so important to their traditional gathering of limu and the fisheries attracted to the limu. These concerns are either ignored, or at best, dismissed in the FEIS with no analyses of potential impacts or mitigations. Traditional knowledge of the underground flows is not even considered.

Please require the FEIS to do the work necessary to meet the standard of Chapter 343 and HAR 11-200.

Mahalo for your diligence

Lucienne de Naie
Conservation Chair
Sierra Club Maui