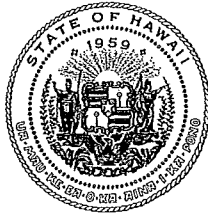


DAVID Y. IGE  
GOVERNOR OF HAWAII



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

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

December 7, 2015

2015 DEC 11 A 7:22  
LAND USE COMMISSION  
STATE OF HAWAII

Makila Land Co., LLC  
Attn: Heidi Bigelow  
305 East Wakea Avenue, Suite 100  
Kahului, Hawaii 96732

Dear Ms. Bigelow:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division and (b) Commission on Water Resource Management on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

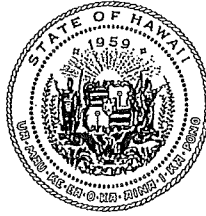
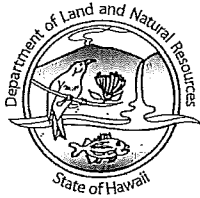
A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji  
Land Administrator

Enclosure(s)

cc: Tom Schnell, Principal; PBR Hawaii & Associates, Inc.  
Daniel Orodener, Executive Officer; State of Hawaii Land Use Commission  
Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



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

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

November 10, 2015

MEMORANDUM

RECEIVED  
LAND DIVISION  
DEC 01  
2015 NOV 31 AM 10:45  
DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

TO:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division -- Maui District
- Historic Preservation

FR:

TO:

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community

LOCATION: Lahaina, Island of Maui; TMK: (2) 24-013:001 - 012

APPLICANT: Makila Land Co., LLC

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **December 4, 2015**.

The EISPN can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on Previous Environmental Notices under Quick Links on the right. Next, find November 8, 2015.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- ( ) We have no objections.
- ( ) We have no comments.
- ( x ) Comments are attached.

Signed: /s/ Jeffrey T. Pearson, P.E.  
Deputy Director

Print Name: \_\_\_\_\_

Date: November 30, 2015

cc: Central Files

FILE ID:	RFD. 4283.6
DOC ID:	135074

DAVID Y. IGE  
GOVERNOR OF HAWAII



SUZANNE D. CASE  
CHAIRPERSON

WILLIAM D. BALFOUR, JR.  
KAMANA BEAMER, PH.D.  
MICHAEL G. BUCK  
MILTON D. PAVAO  
VIRGINIA PRESSLER, M.D.  
JONATHAN STARR


JEFFREY T. PEARSON, P.E.  
DEPUTY DIRECTOR

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
P.O. BOX 621  
HONOLULU, HAWAII 96809

November 30, 2015

REF: RFD.4283.6

TO: Mr. Russell Tsuji, Administrator  
Land Division Oahu, DLNR-LD

FROM: Jeffrey T. Pearson, P.E., Deputy Director   
Commission on Water Resource Management

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community

FILE NO.: RFD.4283.6  
TMK NO.: (2) ~~24~~-013:001 - 012  
4-7<sub>20</sub>

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrm>.

Our comments related to water resources are checked off below.

1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.
6. We recommend the use of alternative water sources, wherever practicable.
7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at [http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH\\_Irrigation\\_Conservation\\_BMPs.pdf](http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf).

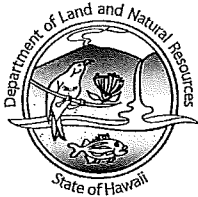
9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a steam channel.
16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- OTHER: The DEIS should include a discussion of the potential impacts on water resources, as well as any impacts on cultural practices that are dependent on the water resources, that may arise if this project is pursued; any existing wells or other water sources located within the project area; projected water requirements for the project, both potable and non-potable, and the calculations used to derive the projected water needs; water conservation and efficiency measures that will be implemented; the proposed water sources, including identification and discussion of alternative sources of water that may be available to meet nonpotable needs; and BMPs for stormwater management.

If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.

DAVID Y. IGE  
GOVERNOR OF HAWAII



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



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

November 10, 2015

MEMORANDUM

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII  
2015 DEC -2 AM 10:57  
RECEIVED  
LAND DIVISION  
NOV 12 PM 11:04 ENGINEERING  
ENGINEERING

TO: FR:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Maui District
- Historic Preservation

TO:

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community <sup>4-7-</sup>

LOCATION: Lahaina, Island of Maui; TMK: (2) ~~2-4~~-013:001 - 012

APPLICANT: Makila Land Co., LLC

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **December 4, 2015**.

The EISPN can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on Previous Environmental Notices under Quick Links on the right. Next, find November 8, 2015.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: \_\_\_\_\_

Print Name: **Cathy S. Chang, Chief Engineer**

Date: 12/2/15

cc: Central Files

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

**LD/ Russell Y. Tsuji**  
**Ref.: EISPN for Makila Rural Community, Lahaina**  
**Maui.033**

**COMMENTS**

- (X) **We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone X. The National Flood Insurance Program (NFIP) does not regulate developments within Zone X.**
- ( ) Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is also located in Zone \_\_\_\_.
- ( ) Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is \_\_\_\_.
- ( ) Please note that the project site must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.

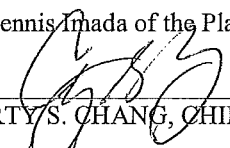
Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- ( ) Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
  - ( ) Mr. Carter Romero (Acting) at (808) 961-8943 of the County of Hawaii, Department of Public Works.
  - ( ) Mr. Carolyn Cortez at (808) 270-7253 of the County of Maui, Department of Planning.
  - ( ) Mr. Stanford Iwamoto at (808) 241-4896 of the County of Kauai, Department of Public Works.
- 
- ( ) The applicant should include project water demands and infrastructure required to meet water demands. Please note that the implementation of any State-sponsored projects requiring water service from the Honolulu Board of Water Supply system must first obtain water allocation credits from the Engineering Division before it can receive a building permit and/or water meter.
  - ( ) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

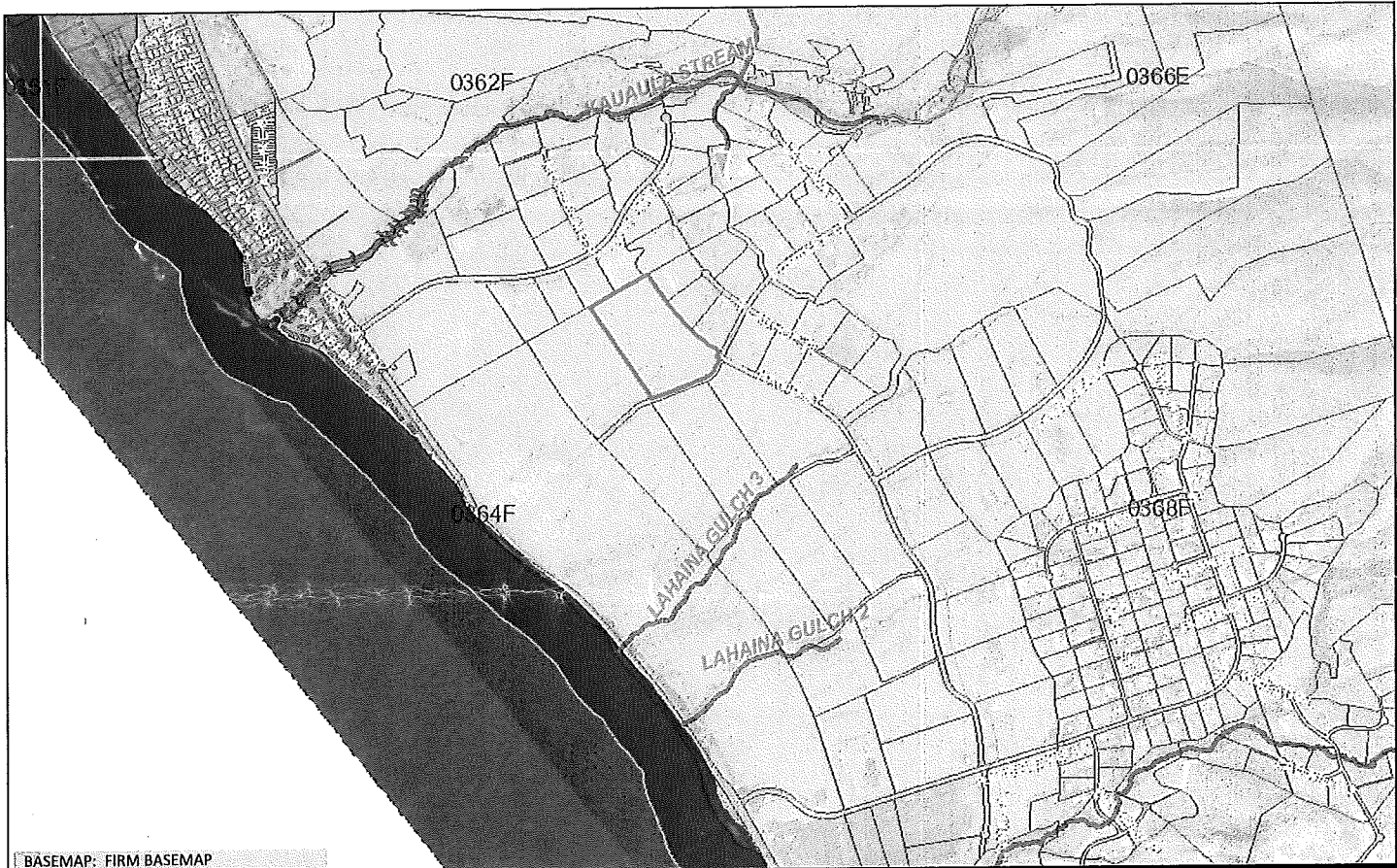
( ) Additional Comments: \_\_\_\_\_  
\_\_\_\_\_

( ) Other: \_\_\_\_\_

Should you have any questions, please call Mr. Dennis Imada of the Planning Branch at 587-0257.

Signed:  \_\_\_\_\_  
CARTYS S. CHANG, CHIEF ENGINEER

Date: 12/8/15



BASEMAP: FIRM BASEMAP



# Flood Hazard Assessment Report

www.hawaiiifp.org

## Property Information

COUNTY: MAUI  
 TMK NO: (2) 4-7-013:001  
 WATERSHED: KAUAULA; LAUNIUPOKO  
 PARCEL ADDRESS: LAUNIUPOKO  
 LAHAINA, HI 96761

## Notes:

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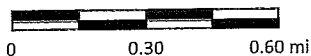
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## Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 4, 2015  
 LETTER OF MAP CHANGE(S): NONE  
 FEMA FIRM PANEL: 1500030364F  
 PANEL EFFECTIVE DATE: SEPTEMBER 19, 2012

THIS PROPERTY IS WITHIN A TSUNAMI EVACUATION ZONE: NO  
 FOR MORE INFO, VISIT: <http://www.scd.hawaii.gov/>

THIS PROPERTY IS WITHIN A DAM EVACUATION ZONE: NO  
 FOR MORE INFO, VISIT: <http://dlnreng.hawaii.gov/dam/>



*Disclaimer: The Hawaii Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use, accuracy, completeness, and timeliness of any information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR, its officers, and employees from any liability which may arise from its use of its data or information.*

*If this map has been identified as 'PRELIMINARY', please note that it is being provided for informational purposes and is not to be used for flood insurance rating. Contact your county floodplain manager for flood zone determinations to be used for compliance with local floodplain management regulations.*

## FLOOD HAZARD ASSESSMENT TOOL LAYER LEGEND

(Note: legend does not correspond with NFHL)

**SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD** - The 1% annual chance flood (100-year), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. SFHAs include Zone A, AE, AH, AO, V, and VE. The Base Flood Elevation (BFE) is the water surface elevation of the 1% annual chance flood. Mandatory flood insurance purchase applies in these zones:

	Zone A: No BFE determined.
	Zone AE: BFE determined.
	Zone AH: Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
	Zone AO: Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
	Zone V: Coastal flood zone with velocity hazard (wave action); no BFE determined.
	Zone VE: Coastal flood zone with velocity hazard (wave action); BFE determined.
	Zone AEF: Floodway areas in Zone AE. The floodway is the channel of stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without increasing the BFE.

**NON-SPECIAL FLOOD HAZARD AREA** - An area in a low-to-moderate risk flood zone. No mandatory flood insurance purchase requirements apply, but coverage is available in participating communities.

	Zone XS (X shaded): Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
	Zone X: Areas determined to be outside the 0.2% annual chance floodplain.

## OTHER FLOOD AREAS

	Zone D: Unstudied areas where flood hazards are undetermined, but flooding is possible. No mandatory flood insurance purchase apply, but coverage is available in participating communities.
--	--

LAND USE COMMISSION  
STATE OF HAWAII

William S. Pepe  
792 North Street  
Greenwich, CT 06831

2015 DEC 11 A 6: 24

December 7, 2015

State of Hawaii Land Use Commission  
P.O. Box 2359  
Honolulu, HI 96804

*via email: luc@dbebt.hawaii.gov*

Makila Land Co., LLC  
305 E. Wakea Ave., Suite 100  
Kahului, HI 96732

*via email maria@westmauiland.com*

**Re: Makila Rural Community EISPN  
Docket No. A15-719**

Dear Sir/Madam:

I am writing to provide comments to the Environmental Impact Study Preparation Notice ("EISPN") for the Makila Rural Community (the "Project") that is being proposed for the area near Launiopoko, Maui, and was published on November 8, 2015 under Docket No. A15-719. I own a home in the Mahanalui Nui subdivision, which is near the proposed Project and will be negatively impacted by the Project.

I have grave concerns about the proposed Project as it appears to be in conflict with several planning directives, contrary to current zoning and land use classifications, inconsistent with current and planned future character of the area, and not appropriate given the other large-scale developments proposed in the area. If approved, the Project would create an unbroken developed area from Olowalu to and through Lahaina all the way to Napili and would expand the urban growth area. This is not desirable for the Island of Maui.

In addition to these general concerns which should be addressed by the planned EIS, the following specific topics should be covered:

- Conflicts with Other Master Plans. The Project appears to be in conflict with the Maui Island Plan's open space requirements as it includes an "urban core" in an area not contemplated as urban in the Maui Island Plan. The Project also appears to be in conflict with the "Pali to Puamana Parkway Master Plan" (in current form) which contemplates a separate community near Olowalu, but does not contemplate either an "urban core" in this area or unbroken sprawl from Lahaina/Launiupoko through Olowalu. On a related note, the Lahaina Bypass was designed to be just that – a bypass – the Project will instead turn the Bypass into an urban (congested) corridor.



- Urban Growth. The EISPN acknowledges that the Project is outside of the Urban Growth Boundary. By itself this is a reason to reject the Project, as the urban area of Lahaina/Launiupoko should not be expanded further.
- Traffic. The EISPN lists traffic as a subject to be covered in the EIS, but does not appear to consider it a major concern. Traffic needs to be a major topic of study, as traffic is now “stop-and-go” for large periods of time. Adding hundreds of homes to an already over-burdened highway infrastructure is wholly inappropriate.
- Cumulative Impacts. The EISPN fails to address the impact of numerous nearby developments that are already-entitled, partially permitted, or only proposed. The already-existing proposals, by themselves, will radically change the area and overburden the infrastructure; the Project will only make it worse. Because any negative impacts to the infrastructure will affect the already-slow traffic between the major population centers of Central/South Maui and Lahaina/Ka’anapali, all infrastructure improvements would have to be in place before any residences could be built.
- Fire/Emergency Access. This area is dry (less than 15 inches of rain per year) and has experienced several fast-spreading brushfires in the recent past. The existing infrastructure is inadequate to evacuate existing residents and visitors, and the Project will add additional residents who must be addressed in emergency planning.
- Water/Wastewater. The Project will result in vastly increased water usage and water discharge. As noted above, the area is currently a semi-desert; adding hundreds of residences would radically change the amount of water needed for the area, and the amount of water discharged from the area. The burden on existing water sources must be thoroughly studied, to include ensuring that adequate water flow exists to fight future fires.
- Disclosure. The EIS should address whether, and to what extent, the plans for the proposed Project were disclosed during the review process for surrounding projects. The Petitioner has owned the Project parcels during the entire time it and its related entities have developed several subdivisions in the surrounding areas. If the current Project was not disclosed and discussed as part of the cumulative impacts of the other projects, that analysis must occur now, and the failure to disclose the current Project should be considered in that analysis. I do not recall receiving any notification that the current Project was planned, and the documents I received when I purchased my property do not appear to disclose it, either.

December 8, 2015  
Page 3

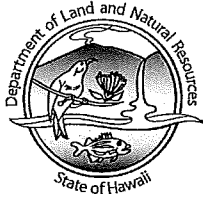
Thank you for your consideration of my comments. Please provide me notice if and when a Draft EIS is prepared and ready for comments. This appears to be an ill-advised Project, and I ask that you give it close attention.

Sincerely,

A handwritten signature in black ink, appearing to read "William Pepe". The signature is written in a cursive style with a large, prominent initial "W".

William Pepe

DAVID Y. IGE  
GOVERNOR OF HAWAII



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

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

December 8, 2015

Makila Land Co., LLC  
Attn: Heidi Bigelow  
305 East Wakea Avenue, Suite 100  
Kahului, Hawaii 96732

Dear Ms. Bigelow:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on December 7, 2015, enclosed are comments from the Division of Aquatic Resources on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be "Russell Y. Tsuji".

Russell Y. Tsuji  
Land Administrator

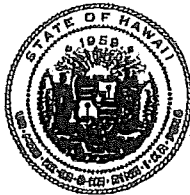
Enclosure(s)

cc: Tom Schnell, Principal; PBR Hawaii & Associates, Inc.  
Daniel Orodener, Executive Officer; State of Hawaii Land Use Commission  
Central Files

2015 DEC 11 A 6:24

LAND USE COMMISSION  
STATE OF HAWAII

DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

2015 DEC -7 AM 10:57

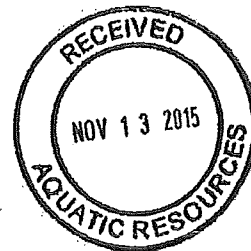
SUZANNE D. CASE  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

November 10, 2015

MEMORANDUM



DAR #5202

JKV  
RS

- TO: DLNR Agencies:
- Div. of Aquatic Resources
  - Div. of Boating & Ocean Recreation
  - Engineering Division
  - Div. of Forestry & Wildlife
  - Div. of State Parks
  - Commission on Water Resource Management
  - Office of Conservation & Coastal Lands
  - Land Division - Maui District
  - Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community

LOCATION: Lahaina, Island of Maui; TMK: (2) 2-4-013:001 - 012

APPLICANT: Makila Land Co., LLC

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **December 4, 2015**.

The EISPN can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on Previous Environmental Notices under Quick Links on the right. Next, find November 8, 2015.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

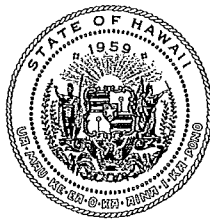
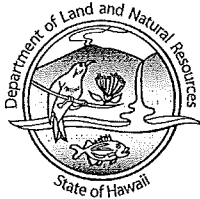
- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name: Bruce S. Anderson, DAR Administrator  
Date: 12/3/15

cc: Central Files

DAVID Y. IGE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

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

KEKO A KALUHIWA  
FIRST DEPUTY

W. ROY HARDY  
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING

FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

Date: 12/2/2015  
DAR # 5202

MEMORANDUM

TO: Bruce Anderson, DAR Administrator *BA*

DATE: December 2, 2015

FROM: Russell Sparks, Aquatic Biologist *Russell Sparks*

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community.

Comment	Date Request (11/10/2015)	Receipt (11/13/2015)	Referral (11/13/2015)	Due Date (12/04/2015)
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Requested by: Russell Y. Tsuji, Land Administrator

Summary of Proposed Project

Title: Environmental Impact Statement Preparation Notice (EISPN) for Makila Rural Community

Project by: Makila Land Co., LLC

Location: Lahaina, Island of Maui, TMK(2)2-4-013:001-012

Brief Description: A preliminary review of the Environmental Impact Statement Preparation Notice (EISPN) for the proposed development of the Makila Rural Community in Lahaina, Maui. Proposed actions would involve the reclassification of 271.175 acres of agricultural lands into 231 acres of rural lands and 40 acres of urban lands. Plans call for the development of 150 residential lots with between 50 and 75 single-family workforce housing units, a central park, community center, commercial space, and possible future fire and ambulance substations. Approximately 7 acres would also be set aside for future construction of the Honoapi'ilani Highway Bypass.

Comments:

This project will result in a major land classification change from mostly open fallow agricultural lands to 150 residential lots with accompanying infrastructure (roads, storm drains, wastewater treatment and disposal systems, etc). Land changes such as this would be expected to have major impacts to neighboring coastal and nearshore marine ecosystems. As a result, detailed biological assessments of the coastal and nearshore marine ecosystems would need to be included in the Draft EIS.

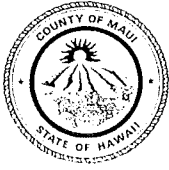
Careful consideration should be made for ways to mitigate the increased land based pollution to the marine environments that border this proposed project area (during construction and after construction). With past major construction projects in the west side of the Island, heavy sedimentation has been the norm during the grading and the early construction phase. Carefully designed and detailed construction runoff management plans, including detailed descriptions on how these plans will be monitored and adapted, should be included. It is not sufficient to simply list best management practices. Past experience has demonstrated industry standard BMP's are not adequate at preventing sediment runoff from occurring along the steep terrain of West Maui. Once fully built out, increases in the resident population will further stress the marine ecosystems from additional direct activities (fishing, snorkeling, surfing, etc.). Nutrient pollution from landscaping, farming, and wastewater disposal will also increase with the addition of 150 residential properties to this area. The proposed plans for LID approaches to handle runoff and the use of wastewater for irrigation are good ways to mitigate some of these impacts, but detailed studies estimating the amount of impervious surfaces that will be created with this project and how this would be expected to increase runoff from land during high rainfall events would be helpful when you look to design mitigations to the increased runoff and pollution. With these studies and the information they provide, storm water management plans should be developed to retain 100% of this water runoff and other generated pollution on site.

Finally, I suggest the addition of a two community groups that should be carefully consulted throughout the development of the DEIS. The Maui Nui Marine Resource Council (MNMRC) is a citizen's ad hoc group made up of marine scientist and concerned Maui community members. They have been very concerned with planed developments in Maui County, and are focused on improving coastal water quality and nearshore fish stocks. Another community group in the area of this planned development is the Polanui Hiu Community Managed Makai Area. This community group is specifically concerned with developing specific management plans to improve the nearshore marine resources in the Puamana to Lahaina harbor area. I strongly suggest you involve them in the process as early and as often as possible. The addition of 150 residential homes in the Launiupoko area will undoubtedly increase various stressors to the coastal and marine

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ecosystems of Lahaina, and the specific concerns from these community groups would be critical to seek out and address these impacts.

Thank you for providing DAR the opportunity to review and comment on the proposed project and EISPN. DAR requests the opportunity to review and comment the completed DEIS and/or any future changes to these proposed rural development plans.



ALAN M. ARAKAWA  
MAYOR

OUR REFERENCE

YOUR REFERENCE

# POLICE DEPARTMENT

## COUNTY OF MAUI

55 MAHALANI STREET  
WAILUKU, HAWAII 96793  
(808) 244-6400  
FAX (808) 244-6411



TIVOLI S. FAAUMU  
CHIEF OF POLICE

DEAN M. RICKARD  
DEPUTY CHIEF OF POLICE

November 24, 2015

Mr. Tom Schnell, Principal  
PBR Hawaii & Associates, Inc.  
1001 Bishop Street  
ASB Tower, Suite 650  
Honolulu, HI 96813

LAND USE COMMISSION  
STATE OF HAWAII  
2015 DEC 11 A 6:24

Dear Mr. Shigekuni:

SUBJECT: Makila Rural Community

Thank you for your letter of November 6, 2015 requesting comments on the above subject.

We have reviewed the information submitted and have enclosed our comments. Thank you for giving us the opportunity to comment on the proposed project.

Very truly yours,

Assistant Chief Victor K. Ramos  
for: TIVOLI S. FAAUMU  
Chief of Police

Enclosure

c: William Spence, Maui County Planning Department  
✓ State of Hawaii Land Use Commission  
Makila Land Co., LLC



NOTED (Forwarded COLUZZI)  
Accordingly  
AA  
11/19/15

**TO: TIVOLI S. FAAUMU, CHIEF OF POLICE, MAUI COUNTY**  
**VIA: CHANNELS**  
**FROM: TIMOTHY HODGENS, P.O. II, LAHAINA PATROL**  
**SUBJECT: ENVIROMENTAL IMPACT STATEMENT PREPARATION NOTICE  
REVIEW FOR THE MAKILA RURAL COMMUNITY IN LAHAINA**

*Conan*  
Victor K. Ramos  
Assistant Chief  
11/16/15

Sir, this To/From is in regards to a review of a Environmental Impact Statement Preparation Notice for the Makila Rural Community in Lahaina.

On 11/13/15, received a "Request for comments" for the proposed upcoming Makila Community to be built in Lahaina. The proposed project consists of 271 acres, divided up into 12 parcels. The entire project is located on the Mauka side of Highway 30, and falls in between Kai Heleku Street and Hokiokio Place as you enter Lahaina Town. The developers state that they wish to develop 150 residential lots, and another 50 to 75 workforce units in the area. The developer mentions that they "may" have space for an Ambulance or Fire "substation" on the property as well. With the growing number of residences and business being built South of Lahaina Town, it is important the developers think about Emergency Services and response time for their projects.

The proposed project will have minimal impact on the traffic in the area during its construction, but once the project is completed and people start to move in, the traffic flow at the two major intersections will need to be addressed. (Kai Heleku Street and Hokiokio Pl). With the increase of homes and businesses, comes the increase for "calls for service" for the police department. This increase needs to be monitored and appropriate staffing needs to be addressed.

*Concur w/ Ofc. Hodgens's  
Comments, minimal impact  
on police services and traffic  
during the construction phase.*

*Ofc. Skyp  
11/13/15 P 1130hrs.*

Respectfully submitted;

**Timothy HODGENS #2319**  
**Police Officer II Lahaina Patrol**  
**11/13/15 1000 Hrs**

December 8, 2015

Makila Land Co., LLC  
305 East Wakea, Suite 100  
Kahului, Hawaii 96832

State of Hawaii Land Use Commission  
Department of Business, Economic Development & Tourism  
P. O. Box 2359  
Honolulu, Hawaii 96804

PBR & Associates1001  
Bishop Street, Suite 650  
Honolulu, Hawaii 96813

LAND USE COMMISSION  
STATE OF HAWAII  
2015 DEC 11 A 8:52

Re: Makila Rural Community, docket Number: A 15-799

To whom it may concern:

I am here by submitting comments on the EISPN regarding the above project.

The applicant in their submittal would have you believe the agricultural lands they are attempting to develop are somewhat marginal agricultural lands. This is far from the case! As an irrigation supervisor for Pioneer Mill I was directly in charge of these very lands which were some of the best sugar producing lands of the 9000 acre sugar plantation. Do not be fooled into thinking these are low productive agricultural lands.

Elsewhere in the submittal the applicant suggests that the rural lots it plans to sell could be used as small agricultural farms in seeming contradiction of the earlier 'claim'. This is pure wishful thinking in that there is no mandate for a farm plan or farming on rural lots whereas agricultural lots require a Farm Plan prior to obtaining a building permit. So, I ask you which would produce more farm activity, rural lots as proposed or agricultural lots that currently exist on these lands in question?

I have grave concerns about water availability and quality. The agricultural water system that currently serves the Makila Plantation and Mahanalua Nui from the Kauaula and Launiupoko streams is insufficient to service the current lots, a number of which have not been developed to date. The applicant's water company will show shortages over the summer months as well as requests of the residents to conserve water. If all the current lots are developed shortages will increase. When asked neither the applicant nor the consultant would indicate that agricultural water would be used in this new development. There is no additional agricultural water available for this development. I can show you the sources and prove this without a doubt as I was directly responsible for the water sources of Pioneer Mill in my capacity as Civil Engineering Department Superintendent.

The sewage treatment plant proposed by the applicant is another concern of mine. As a former member of the Maui County Advisory Committee on Non-point Source Pollution as well as the State Technical Committee on Non-point Source Pollution, I am concerned that during major storms, electrical outages, and/ or equipment failures sewage effluent could very well reach the ocean. The endangered Hawaiian monk seals haul out at the Launiupoko Park area. Seals and sewage effluent are not a healthy mix. Neither are surfers, coral, fish, and park users!

I live in the Makila Plantation area adjacent to this proposed development. I see Nene geese on a daily basis flying diagonally across my property from this proposed development property. I would surmise that the Nene geese maybe using this area for foraging.

Respectfully submitted,



George Brown  
82 S Lauhoi Place  
Lahaina, Hawaii