



APPENDIX S
DEIS Agency and Community Comment and
Response Letters



FEIS AGENCY & PUPRIC COMMENT AND RESPONSE LETTERS	COMMENT LETTER DATE
1. County of Maui, Department of Public Works	May 23, 2016
2. County of Maui, Department of Water Supply	June 20, 2016
3. County of Maui, Fire Prevention Bureau, Department of Fire and Public Safety	February 10, 2016
4. County of Maui, Department of Housing and Human Concerns, Housing Division	February 11, 2016
5. County of Maui, Department of Parks and Recreation	February 29, 2016
6. County of Maui, Department of Planning	March 9, 2016
7. County of Maui, Department of Environmental Management	April 13, 2016
8. County of Maui, Police Department	February 25, 2016
9. State of Hawaii, Department of Accounting and General Services	February 9, 2016
10. State of Hawaii, Department of Land and Natural Resources, Land Division	May 24, 2016
11. State of Hawaii, Department of Land and Natural Resources, State Historic Preservation Division	March 24, 2016
12. State of Hawaii, Department of Agriculture	March 30, 2016
13. State of Hawaii, Department of Defense	March 24, 2016
14. State of Hawaii, Department of Education	March 23, 2016
15. State of Hawaii, Department of Health, Environmental Planning Office	February 10, 2016
16. State of Hawaii, Department of Health, Maui District Health Office	March 8, 2016
17. State of Hawaii, Department of Health, Wastewater Branch	February 12, 2016
18. State of Hawaii, Department of Transportation, Airports Division	May 18, 2016
19. State of Hawaii, Department of Transportation, Highways Division	
20. State of Hawaii, Department of Health, Office of Environmental Quality Control	March 24, 2016
21. State of Hawaii, Office of Hawaiian Affairs	March 24, 2016
22. State of Hawaii, Department of Business Economic Development and Tourism, Office of Planning	March 28, 2016
23. Mr. Richard "Dick" Mayer	March 28, 2016
24. Mr. Richard "Dick" Mayer	March 28, 2016
25. Mr. Albert Perez, Executive Director, Maui Tomorrow	March 30, 2016

1. County of Maui, Department of Public Works

ALAN M. ARAKAWA
Mayor

DAVID C. GOODE
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GLEN A. UENO, P.E., P.L.S.
Development Services Administration

CARY YAMASHITA, P.E.
Engineering Division

LESLI L. OTANI, P.E., L.S.
Highways Division

COUNTY OF MAUI
DEPARTMENT OF PUBLIC WORKS
200 SOUTH HIGH STREET, ROOM NO. 434
WAILUKU, MAUI, HAWAII 96793

May 23, 2016

Mr. Michael J. Summers, President
PLANNING CONSULTANTS HAWAII, LLC
2331 West Main Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Summers:

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR
WAIKAPU COUNTRY TOWN; TMK: (2) 3-6-002:001, 003;
3-6-004:003, 006; 3-6-005:007; 3-6-006:036**

We reviewed the subject application and have the following comments:

Comments from the Engineering Division:

1. Applicant shall have U.S. Army Corps of Engineers review the drainage plan affecting Waikapu Stream. The Corps response shall be provided to the Engineering Division for confirmation of action.
2. The applicant shall be responsible for all required improvements as required by Hawaii Revised Statutes, Maui County Code and rules and regulations.
3. As applicable, construction plans shall be designed in conformance with Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standard Detail for Public Works Construction, 1984, as amended.
4. As applicable, worksite traffic-control plans/devices shall conform to the most recent version of the "Manual on Uniform Traffic Control Devices for Streets and Highways", used by the County of Maui.

5. The applicant shall provide a comprehensive Storm Water Management plan for the development. The plan shall conform to County of Maui Municipal Separate Stormwater System (MS4) regulations.
6. The following comments relate to traffic:
 - a. Page I-31, Schools: Provide discussion on the timing of construction of the mentioned elementary school in relation to the anticipated build out of the Waikapu Country Town (WCT) project.
 - b. Page V-69, Existing Levels of Service (LOS): Counts were done in 2013, we recommend updating data to reflect current conditions.
 - c. Appendix I, Page 27-28, Baseline Street System Improvements: Add note to clarify which listed roadway projects are outside of the WCT's study area.
 - d. Appendix I, Page 35, Project Street System Improvements, Intersection 10, Waiale Road & Main Street: Intersection is assumed in the report to be a single-lane roundabout, however, existing easement for roadway purposes (proposed roadway lot) for the Waiale Road Extension is not configured to accommodate a roundabout. The WCT project should plan ahead with respect to any needed roadway right-of-way expansions should a roundabout be the pursued intersection design.
 - e. Appendix I, Page 37, Project Trip Generation Estimates: Provide discussion on how 15% for daily and 25% peak hour reductions were determined to be appropriate. Are there mixed use developments on Maui or in the State of Hawaii which support the selected percent reductions?
 - f. Appendix I, Page 53, Paragraph 1: For support, provide an example of why adding lanes to improve LOS at the movement level may have negative impacts.
 - g. Appendix I, Table 40, Intersection 2: With Project conditions degrade the LOS from D to E in the PM peak hour and further degrade an already projected LOS E in the AM peak

Mr. Michael J. Summers, President
May 23, 2016
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hour. Project should fully fund improvements at this location similar to Honoapiilani Highway and Kuikahi Drive.

- h. Appendix I: Analysis assumes completion of Waiale Road between Waiko Road and Honoapiilani Highway. What are plans should the roadway not be constructed by 2022 (Phase 1 horizon)?
- 7. General comment: Please confirm which roadways built within the development will be dedicated to the County of Maui, if any.
- 8. Funding for improvements to Waiko Road and Waiale Road are currently not included in the six-year Capital Improvement Program (FYs 2017-2022) for the County of Maui. Provide an estimated timeline for the completion of transportation infrastructure based on the anticipated progress rate of development. Provide a discussion regarding roadway infrastructure improvements at the intersection of Waiale Road and Waiko Road, and the development of Waiale Road through the WCT area.

Please call Rowena M. Dagdag-Andaya at 270-7845 if you have any questions regarding this letter.

Sincerely,

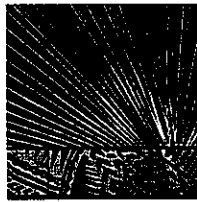


DAVID C. GOODE
Director of Public Works

DCG:RMDA:da

xc: Highways Division
Engineering Division

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**PLANNING
CONSULTANTS
HAWAII, LLC**

URBAN & REGIONAL PLANNING

Land Use Planning • Sustainability Services • Community Planning • Development Permits

December 12, 2016

Mr. David C. Goode
Director of Public Works
County of Maui
Department of Public Works
200 South High Street, Room No. 434
Wailuku, Maui, Hawaii 96793

Dear Goode:

Re: **Draft Environmental Impact Statement Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.**

Thank you for your letter dated May 23, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following responses:

Engineering Division Comments

1. The Project's drainage plans will be provided to the U.S. Army Corps of Engineers for comment.
2. The Applicant acknowledges that the Project must comply with all State and County rules and regulations.
3. The Applicant acknowledges that the Project's construction plans must be designed in accordance with the Hawaii Standard Specifications for Road and Bridge Construction dated 2005 and Standard Detail for Public Works Construction, 1984, as amended.

4. The Applicant acknowledges that worksite traffic control plans/devices shall conform to the most recent version of the "Manual on Uniform Traffic Control Devices for Streets and Highways", used by the County of Maui.
5. The Applicant will provide a comprehensive Storm Water Management plan for the development. The Plan will conform to the County of Maui Municipal Separate Stormwater System (MS4) regulations.

Comments Concerning Traffic

- 6.a *Timing of elementary school construction.* According to the State Department of Education, the timing of the construction of the elementary school is uncertain at this time. However, for the purpose of evaluating the Project's traffic impacts, it was assumed that the school would be constructed by 2026.
- 6.b *Level-of-service counts.* The comment notes that the traffic count data used for the existing level of service (LOS) analysis in the Transportation Impact Analysis Report (TIAR) of the Draft Environmental Impact Statement (DEIS) were collected in 2013. The comment recommends updating this baseline traffic count data to reflect current conditions. In response, Fehr & Peers had new AM and PM peak period traffic counts collected in May 2016 at the same eight intersections that were counted in 2013 when the TIAR was begun. A series of analyses was conducted on the 2016 data to compare it to the baseline data used in the TIAR to determine whether and how local conditions have changed. Furthermore, a memorandum has been prepared that summarizes the key results of the analysis conducted and the comparisons made and is attached as Exhibit A, "Existing 2016 Data Analysis".
- 6.c *Roadway improvements outside of WCT's service area.* The comment requesting clarification on which listed roadway projects in the Baseline Street System subsection are outside of the

WCT study area is noted and hereby made part of the Final Environmental Impact Statement (FEIS). The WCT study area for transportation analysis purposes is generally bounded by Kuikahi Drive/Maui Lani Parkway to the north, Honoapiilani Highway to the west, Kuihelani Highway to the east, and the intersection of Honoapiilani Highway and Kuihelani Highway to the south. Below are the baseline street system improvements that are outside of the WCT study area:

- Hana Highway Widening;
- Honoapiilani Highway Widening;
- Kahului Airport Access Road;
- Lahaina Bypass; and
- Puunene Avenue Widening.

The Baseline Street System Improvements section in the FEIS will denote each of the above improvements located outside of this study area with an asterisk (*).

6.d *Waiale and Main Street roundabout ROW.* The Applicant acknowledges that the minimum ROW for a single lane roundabout at the above-referenced intersection exceeds the dedicated ROW at this location. As such, additional ROW may be required in order to construct the subject roundabout. The Applicant acknowledges that ongoing discussion and planning will be required with the Department in order to determine if a roundabout is the preferred intersection design at this location.

6.e *Peak hour trip reductions.* Attached is a memorandum dated September 30, 2016 from Fehr & Peers that provides justification for the use of a reduction of 15% for daily and of 25% for peak hour traffic volumes. The memorandum also documents mainland studies that helped to establish these reductions (See: Exhibit B, Fehr & Peers Memorandum dated October 26, 2016).

6.f ***Negative impacts from adding additional lanes.*** In response to Comment 6f, Feher and Peers provides the following response:

"Adding lanes to intersections to increase the vehicle carrying capacity will improve their levels of service and reduce the average vehicle delay and queues. This is true of improvements to an intersection overall and to improvements to specific approaches or movements. However, these improvements could have secondary effects, such as right-of-way acquisition and negative effects on pedestrians and bicyclists as they may increase the crossing distance at the intersection and thus increase their level of exposure. The decision to widen intersections should be done on a case-by-case basis by the appropriate agency with jurisdiction that would weigh the effects on all travel modes that use the intersection to mitigate these secondary impacts."

6.g ***Project induced impacts.*** In response to Comment 6g, Feher and Peers provides the following response:

"The comment mistakenly cites Table 40 in Appendix I to the DEIS, when in fact the table referred to is Table 40 of the DEIS (page V-72). The comment correctly cites the data in the table for the PM peak hour but incorrectly states the data for the AM peak hour. In the AM peak hour, intersection LOS would not remain at LOS E, but would decline from a projected LOS E to LOS F (with the addition of project traffic without mitigation). Two levels of mitigation were identified for this location, one that would mitigate the project impact (to the pre-project conditions) and another that would mitigate the intersection to the County's LOS D standard. Table 42 of the DEIS (page V-79) shows the calculated fair-share contribution to off-site traffic mitigation measures at full buildout. Only one location is identified as fully funded by the proposed project: Intersection 6. The table shows that the project should bear its proportional cost at both Intersection 1 and Intersection 2, not that it should fully fund the improvements at either location. The proportions are

33.8% for Intersection 1 and 28.5% for Intersection 2, based on the project-related share of the total volume growth at each intersection."

6.h ***Waiale Bypass Road Funding and Plans.*** In preparing the Project's TIAR, the Applicant assumed that the Waiale Bypass road would be constructed by 2022. This assumption was predicated upon extensive pre-consultation conducted with the Department leading up to the preparation of the subject TIAR, review of the Final Environmental Assessment prepared by the Department for the Waiale Road Extension and East Waiko Road Improvements, and review of the County of Maui's 2016 6-year Capital Improvement Program. However, it has since come to the Applicant's attention by way of the Department's comment letter in response to the DEIS that the timing of the Waiale Bypass is uncertain and that the Applicant should assume that the roadway may not be constructed. As such, the Applicant conducted an analysis of the Project's traffic impact at full buildout without the Waiale Bypass. Feher & Peers completed the analysis in October 2016. The "No Waiale Bypass Scenario" analysis demonstrates that even under a worst-case scenario where none of these roadways are in place, the subject development can achieve an acceptable level-of-service through off-site intersection improvements. (See: Exhibit C, Fehr & Peers Memorandum dated October 17, 2016). Section V.D.1 of the FEIS, and other pertinent sections of the report, have been updated to reflect the results of the "No Waiale Bypass Scenario".

7. ***Dedication of internal roadways.*** The Applicant intends to dedicate all of the WCT's internal roadways to the County. The Applicant also intends to work closely with the County's Department of Public Works, and other applicable agencies, to ensure that the streets meet County requirements, while also ensuring that the streets are designed to safely accommodate pedestrians and bicyclists and that landscape planting is properly maintained. Section III.B.A of the FEIS has been updated in response to the Department's question.

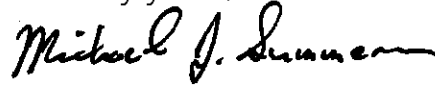
8. ***Funding of Waiale Bypass Road Improvements.*** The Applicant understands that the Waiale Bypass improvement was not

Mr. David C. Goode
Director of Public Works
Department of Public Works
RE: Waikapu Country Town DEIS
December 12, 2016
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included in the County of Maui's Fiscal Years 2017-2022 CIP. In response, the Applicant has conducted an analysis at full-buildout of the Project without the Waialae Bypass. The analysis demonstrates that even under a worst-case scenario where the Waiale Bypass is not in place, the subject development can achieve an acceptable level-of-service through off-site intersection improvements (See: Exhibit C, Fehr & Peers Memorandum dated October 17, 2016). Section V.D.1 of the FEIS, and other pertinent sections of the report, have been updated to reflect the results of the "No Waiale Bypass Scenario".

Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,



Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

MEMORANDUM

Date: September 16, 2016
To: Mike Summers, Planning Consultants Hawaii, LLC
From: Netai Basu & Christine Mercado, Fehr & Peers
Subject: **Waikapu Country Town Project – Existing (2016) Data Analysis**

SD13-0085.01

Among the comments received from Maui County Department of Public Works was a recommendation to update the baseline traffic counts used in the Transportation Impact Analysis Report (TIAR) for the Waikapu Country Town Project because they were collected in 2013. In response, Fehr & Peers had new AM and PM peak period traffic counts collected in May 2016 at the same eight intersections that were counted in 2013 when the TIAR was begun. A series of analyses was conducted on the 2016 data to compare it to the baseline data used in the TIAR to determine whether and how local conditions have changed. This memorandum presents a summary of the new data collected, key results of the analyses conducted and comparisons made, and our determination regarding the sufficiency of the Existing (2013) baseline used in the TIAR.

TRAFFIC VOLUMES

Traffic counts at the eight existing study intersections were collected in September 2013 for the TIAR. To investigate whether and how the traffic conditions at the analyzed study intersections have changed significantly, new turning movement counts at all locations were collected during the weekday AM and PM peak periods in May 2016 when local schools were in session. Additionally, lane configurations and signal phasing were field-checked in May 2016 so that any changes that have been made in the last three years can be factored into this analysis. Based on the recent field observations, changes were identified at only one location, Intersection 1: Honoapiilani Highway & Kuikahi Drive, where the eastbound and westbound approaches have been re-stripped to provide one left-turn lane, one through lane, and one right-turn lane and the eastbound and westbound left-turn phasing have been modified to provide protected/permitted

Exhibit A, Existing 2016 Data Analysis



left-turn phasing. These modifications were assumed in the Existing (2016) intersection operations analysis. **Figure 1** presents the Existing (2016) AM and PM peak hour turning movement volumes and corresponding lane configurations.

SUMMARY OF KEY VOLUME COMPARISONS

Table 1 shows a comparison of the weekday AM and PM peak hour intersection between years 2013 and 2016 at the eight study intersections that existed in 2013, when the TIAR for the proposed Waikapu Country Town project was begun. As shown, the change in volume ranges from -30 to 159 in the AM peak hour and from 6 to 185 in the PM peak hour. The percentage change in total intersection volumes at each study location between 2013 and 2016 ranged from -1.8% to 34.5% in the AM peak hour and from 0.3% to 42.9% in the PM peak hour. The total intersection volumes primarily increased at the eight locations with the exception of Intersection 3: S. Kamehameha Avenue & Maui Lani Parkway and Intersection 8: Kuihelani Highway (SR 380) & Waiko Road, where the percentage change in total intersection volumes decreased to about -2% in the AM peak hour in 2016. Most of the percentage increases in total peak hour intersection volumes are less than 5%; however, there are some notable exceptions such the 34.5% and 42.9% percentage increases in total peak hour volumes at Intersection 6: Waiale Road & Waiko Road, but these higher percentage increases in traffic are largely due to the small volume of traffic at this location. Overall, the increase in total intersection volume throughout the study area increased by about 2.6% in the AM peak hour and 7.3% in the PM peak hour over the course of three years. Additionally, the compounded annual growth rate at most locations was less than 3% per year.



1. Honoapiilani Hwy/Kuikahi Drive 	2. Waiale Rd/Kuikahi Drive 	3. S. Kamehameha Ave/Maui Lani Pkwy
4. Kuihelani Hwy/Maui Lani Pkwy 	5. Honoapiilani Hwy/Waiko Rd 	6. Waiale Rd/Waiko Rd
8. Kuihelani Hwy/Waiko Rd 	14. Honoapiilani Hwy/Kuihelani Hwy <p>* AM Peak Hour data not available</p>	

Figure 1
Peak Hour Traffic Volumes and Lane Configurations
Existing (2016) Conditions





Table 1: Comparison of Intersection Traffic Volumes Between Years 2013 and 2016

Intersection	Peak Hour	Year 2013 Total Volume ¹	Year 2016 Total Volume ²	Volume Change	Percentage Change	CAGR ³
1. Honoapiilani Highway & Kuikahi Drive	AM	2,073	2,093	20	1.0%	0.3%
	PM	1,928	1,934	6	0.3%	0.1%
2. Waiale Road & Kuikahi Drive	AM	1,935	1,956	21	1.1%	0.4%
	PM	1,849	1,918	69	3.7%	1.2%
3. S. Kamehameha Avenue & Maui Lani Parkway	AM	1,700	1,670	-30	-1.8%	-0.6%
	PM	1,593	1,690	97	6.1%	2.0%
4. Kuihelani Highway & Maui Lani Parkway	AM	1,856	1,883	27	1.5%	0.5%
	PM	2,011	2,187	176	8.8%	2.8%
5. Honoapiilani Highway & Waiko Road	AM	1,545	1,649	104	6.7%	2.2%
	PM	1,418	1,584	166	11.7%	3.8%
6. Waiale Road & Waiko Road	AM	461	620	159	34.5%	10.4%
	PM	375	536	161	42.9%	12.6%
8. Kuihelani Highway & Waiko Road	AM	1,336	1,314	-22	-1.6%	-0.6%
	PM	1,407	1,592	185	13.1%	4.2%
14. Honoapiilani Highway & Kuihelani Highway	AM	2,253	No Data ⁴	N/A	N/A	N/A
	PM	2,362	2,422	60	2.5%	0.8%
Total for All Analyzed Intersections⁴	AM	10,906	11,185	279	2.6%	1%
	PM	12,943	13,863	920	7.1%	2.3%

Source: Fehr & Peers, 2016.

Notes:

¹ Baseline traffic counts used in the TIAR for the Waikapu Country Town Project were collected during the weekday morning (6:00 to 9:00 AM) and evening (3:00 to 6:00 PM) peak-period conditions in September 2013.

² New traffic counts were collected during the weekday morning (6:00 to 9:00 AM) and evening (3:00 to 6:00 PM) peak-period conditions in May 2016.

³ CAGR = Compounded annual growth rate

⁴ Due to an issue in the data collection process, AM peak period counts are not available at Intersection 14: Honoapiilani Highway & Kuihelani Highway. Thus, Intersection 14: Honoapiilani Highway & Kuihelani Highway was excluded from the AM totals.



Additionally, to better understand the change in traffic patterns, a screenline assessment was conducted using the total 3-hour volumes for the AM and PM peak periods to assess the changes in overall north-south directional traffic entering and leaving the northern and southern edges of study area. Results of the screenline assessment, which sums the total volume across Honoapiilani Highway, Kuihelani Highway and, at the northern edge of the study area, Waiale Road and Kamehameha Avenue, are summarized below:

- A total of 12,033 vehicles were counted crossing the northern screenline from Honoapiilani Highway to Kuihelani Highway in 2013 during the AM peak period. In 2016, 12,810 vehicles were counted crossing the northern screenline. This represents an increase of 777 vehicles (6.4%) in AM peak period traffic leaving and entering the study area from the north.
- A total of 5,607 vehicles were counted crossing the southern screenline from Honoapiilani Highway to Kuihelani Highway in 2013 during the AM peak period. In 2016, 6,150 vehicles were counted crossing the southern screenline. This represents an increase of about 550 vehicles (9.7%) leaving and entering the study area from the south.
- A total of 14,353 vehicles were counted crossing the northern screenline from Honoapiilani Highway to Kuihelani Highway in 2013 during the PM peak period. In 2016, 15,114 vehicles were counted crossing the northern screenline. This represents an increase of 761 vehicles (5.3%) in the PM peak period traffic leaving and entering the study area from the north.
- During the PM peak period, the traffic crossing the southern screenline decreased from 6,326 to 5,968, a decrease of 358 vehicles (-5.7%) from 2013 to 2016 data.

Overall, the change in traffic leaving and entering the study area during the peak periods from both the north and south is either fairly modest and reflects the new development that has occurred in this area of Maui over the last several years, including a large grocery store and the residential area along Maui Lani Parkway.



EXISTING INTERSECTION LEVEL OF SERVICE

The 2016 peak hour volumes and current lane configurations were also used to calculate levels of service (LOS) for each of the existing study intersections. The results of the LOS analysis for Existing (2016) Conditions are presented in **Table 2** along with the results of the LOS analysis presented in the TIAR for the Existing (2013) Conditions for comparison purposes.

The Existing Conditions analysis using the May 2016 data yielded fairly similar level of service results as the Existing (2013) LOS results presented in the TIAR, with the exception of the increased peak hour delays at Intersection 3: S. Kamehameha Avenue & Maui Lani Parkway. The significant increase in delay at this intersection is likely due to the completion and occupancy of nearby development (primarily residential), which have further contributed to the degradation of this all-way stop location, which was already failing under 2013 PM peak conditions.

CONCLUSION

A comparison of existing (2016) traffic counts and intersection operating conditions with the existing (2013) conditions analysis presented in the TIAR shows that there has been a modest level of growth in traffic in the study area over the last three years. This has resulted in minor changes in volume and delay the study intersections in the vicinity of the proposed Waikapu Country Town project. This is not unexpected, as the three years that have elapsed represent approximately one-quarter of the total 13-year time period between 2013 and 2026, which was the outlying horizon year analyzed in the TIAR for the project. This increase in traffic is due to the completion of development projects within and beyond the study area, and is accounted for the long-term projections in the TIAR's analysis of the future conditions.



Table 2: Existing Intersection Level of Service

Intersection	Traffic Control	Peak Hour	Existing (2013) ¹		Existing (2016) ²		Delta (2016-2013)
			Delay (sec/veh) ³	LOS ^{4,5}	Delay (sec/veh) ³	LOS ^{4,5}	
1. Honoapiilani Highway & Kuikahi Drive ⁶	Signalized	AM	25.2	C	24.3	C	-0.9
		PM	23.3	C	21.2	C	-2.1
2. Waiale Road & Kuikahi Drive	Signalized	AM	26.4	C	30.1	C	3.7
		PM	24.7	C	27.3	C	2.6
3. S. Kamehameha Avenue & Maui Lani Parkway	AWSC	AM	48.3	E	73.6	F	25.3
		PM	54.4	F	89.7	F	35.3
4. Kuihelani Highway & Maui Lani Parkway	Signalized	AM	21.4	C	16.1	B	-5.3
		PM	21.9	C	19.7	B	-2.2
5. Honoapiilani Highway & Waiko Road	Signalized	AM	13.3	B	14.6	B	1.3
		PM	11.9	B	12.8	B	0.9
6. Waiale Road & Waiko Road	SSSC	AM	12.4	B	17.2	C	4.8
		PM	10.9	B	13.5	B	2.6
8. Kuihelani Highway & Waiko Road	Signalized	AM	14.5	B	13.1	B	-1.4
		PM	11.2	B	12.9	B	1.7
14. Honoapiilani Highway & Kuihelani Highway	Signalized	AM	15.2	B	NO DATA ⁷	NO DATA ⁷	N/A
		PM	12.4	B	14.8	B	2.4

Source: Fehr & Peers, 2016.

Notes:

AWSC = All-way stop-controlled intersection

SSSC = Side-street stop-controlled intersection

¹ Results of the existing LOS analysis presented in the *Waikapu Country Town TIAR* (Fehr & Peers, December 2014).

² LOS results based on the intersection peak hour volumes collected in May 2016.

³ Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized and all-way stop-controlled intersections. The vehicular delay for the worst movement is reported for side street stop-controlled intersections.

⁴ LOS calculations performed using the *2000 Highway Capacity Manual (HCM)* method.

⁵ Undesirable LOS highlighted in **bold**.

⁶ Recent field observations confirmed changes in the lane configuration and signal phasing at this location. Thus, the LOS analysis at this location under the Existing (2016) Conditions include these modifications.

⁷ Due to a problem with the data collection process, AM peak period is not available at Intersection 14 and no AM peak hour intersection operations analysis could be conducted.

MEMORANDUM

Date: October 26, 2016

To: Mike Summers, Planning Consultants Hawaii, LLC

From: Netai Basu & Christine Mercado, Fehr & Peers

Subject: Waikapu Country Town Project – Elaboration on Project Trip Generation Estimates

SD13-0085.01

The comment requests discussion on how 15% for daily and 25% peak hour project trip generation reductions were determined to be appropriate is noted and hereby part of the Final Environmental Impact Statement (FEIS).

The use of MXD was part of the methodology in the TIAR from the outset. This was described in an initial scoping memorandum dated September 19, 2013 that was circulated among relevant agencies, including Maui County Public Works. Current accepted methodologies, such as the Institute of Transportation Engineers (ITE) Trip Generation methodology, are primarily based on data collected at suburban, single-use, free-standing sites. These defining characteristics limit their applicability to mixed-use development projects, such as the proposed WCT project. The land use mix, design features, and setting of the proposed for WCT include characteristics that influence travel behavior differently from typical single-use suburban development projects. In response to the limitations in the ITE methodology, and to provide a straightforward and empirically validated method of estimating vehicle trip generation at mixed-use developments, the US Environmental Protection Agency (EPA) sponsored a national study of the trip generation characteristics of multi-use sites. Travel survey data was gathered from 239 mixed-use developments (MXDs) in six major metropolitan regions, and correlated with the characteristics of the sites and their surroundings. The findings indicate that the amount of external traffic generated is affected by a wide variety of factors, each pertaining to one or more of the following characteristics:

- The relative numbers of residents and jobs on the site

Exhibit B, Fehr & Peers Memorandum Dated October 26, 2016



- The amount of retail and service use on the site relative to the number of residences
- The amount of retail and service use relative to the number of employees
- The overall size of the development
- The density of development
- The internal connectivity for walking or driving among different activities
- The availability of transit
- The number of convenient trip destinations within the immediate area

These characteristics were related statistically to the trip behavior observed at the study development sites. This quantified relationships between characteristics of the MXDs and the likelihood that trips generated by those MXDs will stay internal and/or use modes of transportation other than the private vehicle. These statistical relationships produced equations, known as the EPA MXD model, that allows predicting external vehicle trip reduction as a function of the MXD characteristics. Applying the external vehicle trip reduction percentage to "raw trips", as predicted by ITE, produces an estimate for the number of vehicle trips traveling in or out of the site.

Since the conclusion of the EPA sponsored study, Fehr & Peers has been actively enhancing the MXD model to improve sensitivity to various site characteristics, improve peak hour performance, and continue to validate the model against MXDs where data is available. Based on the research findings, Fehr & Peers produced a MXD tool (MXD+) that recognizes that traffic generation by mixed-use and other forms of sustainable development relate closely to the density, diversity, design, destination accessibility, transit proximity, and scale of development. MXD+ improves the accuracy of impact estimation and trip internalization and gives planners a tool to rationally balance land use mix and to incorporate urban design, context compatibility, and transit orientation to create lower-impact development. A set of 28 independent MXD sites throughout the mainland of the country that were not included in the initial model development have been tested to validate the model. None of the surveyed sites were in Hawaii. These sites represent locations where it is expected that traditional data and methodologies, such as ITE, would not accurately estimate the project vehicle trip generation.

Based on all statistical measurements from the validation process, the MXD model performs better than the ITE recommended procedures for these types of sites. The MXD model has been approved for use by the EPA.¹ It has also been peer-reviewed in the ASCE Journal of Urban Planning and Development², peer-reviewed in a 2012 TRB paper evaluating various smart growth trip generation methodologies³, recommended by SANDAG for use on mixed-use smart growth developments⁴, and has been used successfully in multiple certified environmental documents in



Hawaii, California and other states. The TIAR that Fehr & Peers prepared as part of the EIS for the Villages at Leialii Affordable Housing Project (Belt Collins Hawaii, Ltd, November 2010) also used MXD methodology to inform adjustments to the initial trip generation estimates which were based on ITE rates.

Based on the extensive research studies used to develop and validate the MXD model, the trip reduction outputs generated from the model have been found to be more accurate than estimates developed with ITE and other standard methodologies alone.

Endnotes:

¹ Trip Generation Tool for Mixed-Use Developments (2012). www.epa.gov/dced/mxd_tripgeneration.html

² "Traffic Generated by Mixed-Use Developments—Six-Region Study Using Consistent Built Environmental Measures." *Journal of Urban Planning and Development*, 137(3), 248–261.

³ Shafizadeh, Kevan et al. "Evaluation of the Operation and Accuracy of Available Smart Growth Trip Generation Methodologies for Use in California". Presented at 91st Annual Meeting of the Transportation Research Board, Washington, D.C., 2012.

⁴ SANDAG Smart Growth Trip Generation and Parking Study.
<http://www.sandag.org/index.asp?projectid=378&fuseaction=projects.detail>

MEMORANDUM

Date: October 17, 2016

To: Mike Summers, Planning Consultants Hawaii, LLC

From: Netai Basu & Christine Mercado, Fehr & Peers

Subject: Waikapu Country Town Project – Analysis of 2026 Conditions without the Waiale Bypass

SD13-0085.01

Coordination with local and state agencies, such as the County of Maui, and the project team during the early preparation stages of the Transportation Impact Analysis Report (TIAR) for the Waikapu Country Town Project led to the decision to assume the completion of the planned Waiale Bypass in the study's future analysis scenarios. The Waiale Bypass is a planned southward extension of Waiale Road from its existing terminus at Waiko Road to intersect with Honoapi'ilani Highway approximately one mile south of Honoapi'ilani Highway/Waiko Road. The roadway extension would provide additional access to the project land uses on the makai side via a roundabout intersection with the future east-west roadway within the project ("Main Street") and via a 3-legged intersection with the major North-South Residential Street. This bypass is not identified in the County's FY 2017 CIP, and the precise schedule for construction of this roadway is now uncertain. As planned, Waiale Road would be extended southward from Waiko Road to a new connection with Honoapiilani Highway. It would create a new north-south roadway connection in this area with multiple connections to Kuihelani Highway through the County's planned Base Yard and Regional Park.

During the DEIS public circulation period, some comments have questioned this baseline street improvement assumption, especially given the significance of the bypass road for project circulation, and have asked about impacts on project design and the study area's transportation facilities if the roadway improvement is not funded and built in time for the project. In response, Fehr & Peers has developed and analyzed forecast traffic volumes in Year 2026 without the Waiale Bypass in place, both before and after the addition of project traffic. These traffic volumes

Exhibit C, Feher & Peers Memorandum Dated October 17, 2016



were then used to conduct a full quantitative impact analysis of future no-bypass scenarios. The results of the analysis are summarized in this memorandum.

FUTURE TRAFFIC PROJECTIONS

Estimates of the future traffic conditions without the proposed project in place were derived using the Maui Travel Demand Forecasting Model. Particularly, the same 2026 model developed for the TIAR was used; however, the Waiale Bypass (north of the intersection with the planned north-south residential street that would be constructed as part of the project [Study Intersection #12]) was excluded from the roadway network. The resulting post-processed cumulative base traffic volumes and the anticipated lane configurations, representing future conditions without the project and the bypass for year 2026, is presented in **Figure 1**.

2026 NO PROJECT VOLUME COMPARISON

A comparison of the 2026 No Project peak hour volumes with and without the Waiale Bypass showed that the traffic projected to use the roadway extension would shift to use Honoapi'ilani Highway and Kuihelani Highway. Details of the shift in traffic volumes in the study area between Waiko Road and the intersection of Honoapi'ilani Highway & Kuihelani Highway under the 2026 No Project, No Bypass Condition are summarized below:

- During the AM peak hour, 210 additional northbound trips and 70 additional southbound trips would traverse Honoapi'ilani Highway.
- Along Kuihelani Highway, it is projected that there would be 110 additional northbound trips and 130 additional southbound trips traversing this portion of the study area in the AM peak hour.
- During the PM peak hour, 50 additional northbound trips and 210 additional southbound trips would traverse Honoapi'ilani Highway.
- Along Kuihelani Highway, it is projected that there would be 130 additional northbound trips and 80 additional southbound trips traversing this portion of the study area in the PM peak hour.



1. Honoapiʻilani Highway/Kuikahi Drive 	2. Waiale Road/Kuikahi Drive 	3. S. Kamehameha Avenue/Maui Lani Parkway 	4. Kūihelani Highway/Maui Lani Parkway 	5. Honoapiʻilani Highway/Waiko Road
6. Waiale Road/Waiko Road 	7. S. Kamehameha Avenue/Waiko Road 	8. Kūihelani Highway/Waiko Road 	9. Honoapiʻilani Highway/Main Street <p>Intersection does not exist under No Project Conditions</p>	10. Waiale Road/Main Street <p>Intersection does not exist without the Waiale Bypass</p>
11. Honoapiʻilani Hwy/E-W Residential Street <p>Intersection does not exist under No Project Conditions</p>	12. N-S Residential Street/Waiale Road <p>Intersection does not exist under No Project Conditions</p>	13. Honoapiʻilani Highway/Waiale Road <p>Intersection does not exist under No Project Conditions</p>	14. Honoapiʻilani Highway/Kūihelani Highway 	

Figure 1
Peak Hour Traffic Volumes and Lane Configurations
Year 2026 No Project Conditions





PROJECT TRAFFIC PROJECTIONS

Using the same trip generation and overall trip distribution pattern presented in the TIAR, the project trips were assigned to the 2026 roadway network without the bypass. The trip assignment differs from the TIAR as trips to/from land uses on the makai side that were originally using Waiale Road were re-routed to use the site's internal roadways (i.e., Main Street, E-W Residential Road, and N-S Residential Road) and Honoapi'ilani Highway. **Figure 2** illustrates the net new 2026 project generated traffic volumes at full buildout for the AM and PM peak hours at each study intersection.

The project generated traffic volumes (**Figure 2**) were then added to the 2026 base traffic projection (**Figure 1**) to develop 2026 with Project traffic forecasts for the no-bypass scenario shown in **Figure 3**.

KEY STREET SYSTEM CHANGES

In addition to using the revised traffic projections in the 2026 intersection operations analysis presented in this memorandum, there have been changes to the baseline street system assumptions since the completion of the TIAR, as well as changes to the project street system assumptions due to not constructing that Waiale Bypass that have been applied. Described below are the key changes in study intersection configuration used in this analysis:

- Intersection 1: Honoapi'ilani Highway & Kuikahi Drive – Based on the May 2016 field observations, the eastbound and westbound approaches have been re-stripped from one shared through/left-turn lane and one right-turn lane to one left-turn lane, one through lane, and one right-turn lane. Additionally, the eastbound and westbound left-turn phasing has been modified to protected/permitted. These modifications were used in the revised 2026 intersection operations analysis with and without the project in place.
- Intersection 3: S. Kamehameha Avenue & Maui Lani Parkway – A roundabout will be replacing the all-way stop-controlled intersection and construction is likely to begin operation sometime in Summer 2017. This intersection control modification was used in the revised 2026 intersection operations analysis with and without the project in place.
- Intersection 6: Waiko Road & Waiale Road – Signalization and construction of the fourth leg of this intersection are associated with the Waiale Bypass. Since this analysis evaluates



no-bypass scenarios, the existing control and configuration were maintained in the revised 2026 intersection operations analysis with and without the project in place.

- Intersection 9: Honoapi'ilani Highway & Main Street – This future intersection will be constructed as part of the project. Due to the increase in volumes at this location without the Waiale Bypass in place, the intersection configuration has been revised from what was assumed in the TIAR in order to yield acceptable operating conditions (i.e., minimum level of service [LOS] D or better). Thus, this analysis assumes that the intersection is configured with one left-turn lane, one through lane, and one right-turn lane across all approaches. Signal phasing is assumed to be protected/permitted across all approaches, and there would be an overlap phase for the westbound right-turn. These modifications were used in the revised 2026 with project intersection operations analysis.
- Intersection 10: Waiale Bypass & Main Street – This future intersection will not exist without the Waiale Bypass in place.
- Intersection 12: North-South Street Residential & Waiale Bypass– This future intersection will be constructed as part of the project. Without the Waiale Bypass in place this intersection would be a 2-legged, side-street stop-controlled intersection. These modifications were used in the revised 2026 with project intersection operations analysis.
- Intersection 13: Honoapi'ilani Highway & Waiale Bypass – This future intersection will be constructed as part of the project. Without the Waiale Bypass in place, this intersection would be a 4-legged, side-street intersection with stop-control on the minor approach.



1. Honoapiʻilani Highway/Kuikahi Drive 	2. Waiale Road/Kuikahi Drive 	3. S. Kamehameha Avenue/Maui Lani Parkway 	4. Kuihelani Highway/Maui Lani Parkway 	5. Honoapiʻilani Highway/Waiko Road
6. Waiale Road/Waiko Road 	7. S. Kamehameha Avenue/Waiko Road 	8. Kuihelani Highway/Waiko Road 	9. Honoapiʻilani Highway/Main Street 	10. Waiale Road/Main Street <p><i>Intersection does not exist without the Waiale Bypass</i></p>
11. Honoapiʻilani Hwy/E-W Residential Street 	12. N-S Residential Street/Waiale Road 	13. Honoapiʻilani Highway/Waiale Road 	14. Honoapiʻilani Highway/Kuihelani Highway 	

Figure 2
Peak Hour Traffic Volumes and Lane Configurations
Net New Project Only, Phase 1 & 2 (2026)





1. Honoapiʻilani Highway/Kuikahi Drive 	2. Waiale Road/Kuikahi Drive 	3. S. Kamehameha Avenue/Maui Lani Parkway 	4. Kūhelani Highway/Maui Lani Parkway 	5. Honoapiʻilani Highway/Waiko Road
6. Waiale Road/Waiko Road 	7. S. Kamehameha Avenue/Waiko Road 	8. Kūhelani Highway/Waiko Road 	9. Honoapiʻilani Highway/Main Street* <p>* Includes Pass-by Trips</p>	10. Waiale Road/Main Street <p><i>Intersection does not exist without the Waiale Bypass</i></p>
11. Honoapiʻilani Hwy/E-W Residential Street 	12. N-S Residential Street/Waiale Road 	13. Honoapiʻilani Highway/Waiale Road 	14. Honoapiʻilani Highway/Kūhelani Highway 	

Figure 3
Peak Hour Traffic Volumes and Lane Configurations
2026 with Project (Phase 1 & 2) without Bypass Conditions





INTERSECTION ANALYSIS

The intersection operations analysis compares the projected levels of service at each study intersection under cumulative conditions for 2026 with and without the proposed project and without the Waiale Bypass to determine the potential impacts. Results of this analysis are presented in **Table 1**.

2026 NO PROJECT TRAFFIC CONDITIONS

The results of the LOS calculations indicate that all of the future study intersections operate at an overall desirable LOS (LOS D or better) under 2026 No Project Conditions, with the exception of the following locations:

- Intersection 1: Honoapi'ilani Highway & Kuikahi Drive (LOS F – AM peak hour)
- Intersection 2: Waiale Road & Kuikahi Drive (LOS E – AM peak hour hour)
- Intersection 3: S. Kamehameha Avenue & Maui Lani Parkway (LOS F – AM and PM peak hours)
- Intersection 4: Kuihelani Highway & Maui Lani Parkway (LOS F – AM and PM peak hours)
- Intersection 6: Waiale Road & Waiko Road (LOS F – AM Peak hour and LOS E – PM peak hour)
- Intersection 7: S. Kamehameha Avenue & Waiko Road (LOS F – AM and PM peak hours)
- Intersection 8: Kuihelani Highway & Waiko Road (LOS E – AM peak hour)
- Intersection 13: Honoapi'ilani Highway & Waiale Road (LOS F – AM and PM peak hours)

When compared to the 2026 No Project results presented in the TIAR, Intersection 6: Waiale Road & Waiko Road and Intersection 8: Kuihelani Highway & Waiko Road are new locations that would operate at undesirable LOS if the Waiale Bypass is not in place.

2026 WITH PROJECT TRAFFIC CONDITIONS

The proposed project would contribute to cumulative impacts (LOS E or LOS F conditions) during one or both of the peak hours at the seven study intersection listed in the previous section. In addition, project-specific impacts have been identified at intersections where the addition of



project-generated traffic would cause their overall intersection operations to degrade below LOS D in one or both peak hours. The project-related impacts identified are:

- Intersection 1: Honoapi'ilani Highway & Kuikahi Drive (cumulative and project-specific impact)
- Intersection 2: Waiale Road & Kuikahi Drive (cumulative and project-specific impact)
- Intersection 5: Honoapi'ilani Highway & Waiko Road (LOS F in the AM and PM peak hour)

The results of this no-bypass analysis shows that Intersection 5: Honoapi'ilani Highway & Waiko Road and Intersection 6: Waiale Road & Waiko Road are new impacts not identified in the TIAR. Additionally, when comparing these results to the 2026 intersection operations analysis results presented in the TIAR, the impact type at the following locations change:

- Intersection 2: Waiale Road & Kuikahi Drive would also have a project-specific impact in the PM peak hour.
- Intersection 8: Kuihelani Highway & Waiko Road would be identified as a cumulative impact instead of a project-specific impact under the 2026 with Project without Bypass Condition.
- Intersection 13: Honoapi'ilani Highway & Waiale Road would have a project-specific impact in the AM and PM peak hours.



TABLE 1 – YEAR 2026 LEVELS OF SERVICE - WAIKAPU COUNTRY TOWN FULL DEVELOPMENT (PHASE 1 & 2)

Intersection	Traffic Control	Peak Hour	Year 2026 No Project, No Bypass Conditions		Year 2026 with Project Without Bypass Conditions		Delay Change	Mitigation Required?	Impacted in the DEIS?	Mitigated to:		LOS D or Better Conditions	
			Del/Veh ¹	LOS ^{2,3}	Del/Veh ¹	LOS ^{2,3}				Pre-Project or Better Conditions (≤ LOS D)	Del/Veh ¹		LOS ^{2,3}
1. Honoapiʻilani Highway & Kuikahi Drive	Signal	AM	85.5	F	116.5	F	31.0	YES	YES	51.2	D	Same as Pre-Project Mitigation	
		PM	35.1	D	86.2	F	51.1	YES	YES	37.7	D		
2. Waiale Road & Kuikahi Drive	Signal	AM	62.1	E	86.7	F	24.6	YES	YES	46.7	D	Same as Pre-Project Mitigation	
		PM	51.0	D	85.4	F	34.4	YES	YES	36.4	D		
3. S. Kamehameha Avenue & Maui Lani Parkway	Roundabout	AM	> 180	F	> 180	F	**	YES	YES	167.4 ⁴	F ⁴	23.8	C
		PM	> 180	F	> 180	F	**	YES	YES	163.4 ⁴	F ⁴	15.7	B
4. Kuihelani Highway & Maui Lani Parkway	Signal	AM	112.0	F	125.5	F	13.5	YES	YES	25.8	C	Same as Pre-Project Mitigation	
		PM	86.4	F	92.8	F	6.4	YES	YES	33.4	C		
5. Honoapiʻilani Highway & Waiko Road	Signal	AM	40.6	D	> 180	F	**	YES	NO	33.3	C	Same as Pre-Project Mitigation	
		PM	22.8	C	156.0	F	133.2	YES	NO	51.3	D		
6. Waiale Road & Waiko Road	SSSC	AM	> 180	F	>180	F	**	YES	NO	23.9	C	Same as Pre-Project Mitigation	
		PM	48.5	E	>180	F	**	YES	NO	16.3	B		
7. S. Kamehameha Avenue & Waiko Road	SSSC	AM	> 180	F	**	F	**	YES	YES	10.9	B	Same as Pre-Project Mitigation	
		PM	80.1	F	**	F	**	YES	YES	8.3	A		
8. Kuihelani Highway & Waiko Road	Signal	AM	70.5	E	113.1	F	42.6	YES	YES	32.3	C	Same as Pre-Project Mitigation	
		PM	21.0	C	26.6	C	5.6	NO	NO	18.6	B		
9. Honoapiʻilani Highway & Main Street	Signal	AM	Only built with project		46.3	D	46.3	NO	NO	No Mitigation Required			
	AM	44.9			D	44.9	NO	NO					
10. Waiale Road & Main Street	Roundabout	AM	Does not exist without the Waiale Bypass										
		PM											
11. Honoapiʻilani Highway & East-West Residential Street	Signal	AM	Only built with project		13.1	B	13.1	NO	NO	No Mitigation Required			
		PM			9.2	A	9.2	NO	NO				
12. North-South Residential Street & Waiale Road	SSSC	AM	Only built with project		8.9	A	8.9	NO	NO	No Mitigation Required			
		PM			8.6	A	8.6	NO	NO				
13. Honoapiʻilani Highway & Waiale Road	SSSC	AM	Only built with project		>180	F	>180	YES	NO	14.9	B	Same as Pre-Project Mitigation	
		PM			>180	F	>180	YES	NO	9.7	A		
14. Honoapiʻilani Highway & Kuihelani Highway	Signal	AM	21.3	C	22.8	C	1.5	NO	NO	No Mitigation Required			
		PM	23.4	C	26.7	C	3.3	NO	NO				

Source: Fehr & Peers, 2016

Notes:

** Indicated oversaturated conditions. Delay cannot be calculated. AWSC = All-way stop-controlled intersection; SSSC = Side-street stop-controlled intersection.

¹ Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized and all-way stop control intersections. The vehicular delay for the worst movement is reported for side street stop-controlled intersections.

² LOS calculations performed using the 2000 Highway Capacity Manual (HCM) method.

³ Unacceptable LOS highlighted in **bold**.

⁴ The mitigation needed to have the intersection operate better than pre-project conditions is installing signal control and having the existing intersection configuration (i.e., a shared left/through/right lane on the eastbound and westbound approaches and a left-turn lane and a shared through/right-turn lane on the northbound and southbound approaches) in place.



POTENTIAL TRAFFIC IMPROVEMENTS

Physical mitigation measures developed in the TIAR were first applied to the impacted locations and others were investigated as necessary. The emphasis was to identify physical and/or operational improvements that could be implemented within the existing or planned roadway rights-of-way. **Table 1** summarizes the projected LOS in 2026 at the impacted locations with these proposed measures in place.

The full range of improvements that address both project-related and/or cumulative traffic impacts are discussed in detail below.

Intersection 1: Honoapiʻilani Highway & Kuikahi Drive – The mitigation presented in the TIAR is not sufficient to mitigate the impact under the no-bypass scenario. Thus, the impact at this intersection could be reduced by widening the northbound approach from a left-turn lane, a through lane, and a right-turn to a left-turn lane, a through lane, and two right-turn lanes, widening the southbound approach from a left-turn lane, a through lane, and a right-turn lane to two left-turn lanes, a through lane, and a right-turn lane, and widening the westbound approach from a left-turn lane, a through lane, and a right-turn lane to two left-turn lanes, a through lane, and two right-turn lanes. Additionally, to complement the addition of a second southbound left-turn lane and a second westbound left-turn lane, the east and south legs of the intersection would each need to be widened to provide a second departure lane. Signal modifications at this intersection would include protected phasing on all approaches and right-turn overlap phasing on the westbound and northbound approaches. Additional right-of-way would be needed on both Honoapiʻilani Highway and on Kuikahi Drive to fully implement this improvement, which would result in LOS D operations at an overall intersection level.

Intersection 2: Waiale Road & Kuikahi Drive – The impact at this intersection could be mitigated using a reduced version of the improvements proposed in the TIAR for this location. The improvements needed to mitigate the impacts identified under the no-bypass scenario include widening the eastbound and westbound approaches to provide a left-turn lane, two through lanes, and a right-turn lane. To complement the widening of the eastbound and westbound approaches, both the eastbound and westbound departures would also need to be widened to each provide a second receiving lane. This improvement would result in LOS D operations at an overall intersection level.



Intersection 3: S. Kamehameha Avenue & Maui Lani Parkway – The impact at this intersection could be mitigated by implementing the improvements presented in the TIAR, which is signalization of the intersection and maintaining the existing lane configuration (i.e., a shared left/through/right lane on the eastbound and westbound approaches and a left-turn lane and a shared through/right-turn lane on the northbound and southbound approaches). It should be noted, however, that the updated 2026 No Project Condition now assumes that the intersection would be configured as a single-lane roundabout.

As discussed in the TIAR, the pre-project improvement is install a traffic control signal with permitted phasing at all approaches. For LOS D or better operations at an overall intersection level, not only would a traffic signal need to be installed, but the eastbound and northbound approaches would need to provide a left-turn lane and a shared through/right-turn lane and the westbound and southbound approaches to provide a left-turn lane, a through lane, and a right-turn lane.

Intersection 4: Kuihelani Highway & Maui Lani Parkway – The impact at this intersection could be mitigated by implementing the improvements presented in the TIAR, which is to widen the eastbound approach to provide a left-turn lane, a shared through/left-turn lane, and a right-turn lane. In addition to the change in configuration, the eastbound and westbound left-turn phasing would need to be modified to split phasing. This improvement would result in LOS D operations at an overall intersection level.

Intersection 5: Honoapiʻilani Highway & Waiko Road – This intersection is a new impact not previously identified in the TIAR. Thus, the impact at this intersection could be reduced by widening the northbound approach from a left-turn lane and a shared through/right-turn lane to provide a left-turn lane, a through lane, and a shared through/right-turn lane, and widening the eastbound and westbound approaches to provide a left-turn lane and a shared through/right-turn lane. The northbound departure of the highway would require widening for a minimum of approximately 250 feet to provide a second receiving lane, which would transition back into the existing single northbound lane. Additional right-of-way may be needed on both Honoapiilani Drive and Waiko Road to fully implement this improvement, which would result in LOS D operations at an overall intersection level.

Intersection 6: Waiale Road & Waiko Road – The impact at this intersection is a new impact not previously identified in the TIAR. It could be mitigated with the installation of a traffic signal,



which was assumed to be in place in the Cumulative, pre-project condition in the TIAR due to its key location on the planned Waiale Bypass. This improvement would result in LOS D operations at an overall intersection level and the turning movement level.

Intersection 7: S. Kamehameha Avenue & Waiko Road – The impact at this intersection could be mitigated using the improvement presented in the TIAR, which is installing a traffic signal with permitted phasing at all approaches. This improvement would result in LOS D or better operations at both the overall intersection level and the turning movement level.

Intersection 8: Kuihelani Highway & Waiko Road – The impact at this intersection could be mitigated using the improvement presented in the TIAR, which is widening and restriping the eastbound approach to provide a left-turn lane and a right-turn lane. This improvement would result in LOS D or better operations at an overall intersection level.

Intersection 13: Honoapi'ilani Highway & Waiale Road – The impact at this intersection is a new impact not previously identified in the TIAR. It could be mitigated with the installation of a traffic signal, which was assumed to be in place in the Cumulative, pre-project condition in the TIAR due to its key location on the planned Waiale Bypass. This improvement would result in LOS D or better operations at an overall intersection level and the turning movement level.

CONCLUSIONS

This memorandum documents analysis conducted to assess project-related and cumulative impacts upon full build-out of the proposed Waikapu Country Town project if the planned Waiale Bypass were not constructed by 2026. While three more study intersections would be significantly impacted under this scenario than in the “with Bypass” scenario analyzed in the TIAR, LOS D can be achieved at the impacted locations with an expanded program of roadway improvements as mitigation.

2. County of Maui, Department of Water Supply

ALAN M. ARAKAWA
Mayor



DAVID TAYLOR, P.E.
Director

PAUL J. MEYER
Deputy Director

DEPARTMENT OF WATER SUPPLY
COUNTY OF MAUI
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WAILUKU, MAUI, HAWAII 96793-2155
www.mauiwater.org

June 20, 2016

Planning Consultants Hawaii, LLC
Mr. Michael J. Summers, President
2331 West Main Street
Wailuku, Hawaii 96793

Re: TMK: (2) 3-6-002:001 and :003, 3-6-004:003 and :006, 3-6-005:007 and 3-6-006:036
Project Name: Waikapu Country Town
Draft Environmental Impact Statement (DEIS)

Dear Mr. Summers:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS).

Source Availability

The project overlies the Iao and Waikapu aquifers, the former with a sustainable yield of 20 million gallons per day (gpd) and the latter with 3 mgd, according to the Commission on Water Resource Management (CWRM).

The document states that five wells have been drilled on the site, all located within the Waikapu aquifer. The wells' pump tests requirements (CWRM) and water quality compliance (State DOH) should be addressed in the EIS.

A private water system will be utilized for the entire development. Our department has no jurisdiction to impose requirements on subdivisions served by water systems that are not owned and operated by the County. Please note that any proposal to dedicate this water system to the County should reference compliance with the department's rules and regulations, the Maui County Code, and the Water System Standards for Maui County and stated in the EIS.

Consumption

According to the DEIS, the projected average daily water demand is 655,508 gallons per day (gpd), based on DWS system standards. However, Table 47 of the document contains at least one error: "Rural Residential" is not recognized as a Use in the DWS Water System Standards, 2002. Based on system standards, the average daily water demand is at a minimum approximately 876,746 gpd, not including agricultural uses.

"By Water All Things Find Life"



Mr. Michael J. Summers, President
Waikapu Country Town

Pollution Prevention

Best Management Practices (BMPs) protect groundwater resources and should be noted in the EIS and implemented during construction. The mitigation measures below will alleviate adverse impacts on water quality during construction:

- Prevent cement products, oil, fuel and other toxic substances from leaching into the water.
- Properly and promptly dispose of all loosened and excavated soil and debris material from drainage structure work.
- Retain ground cover until the last possible date.
- Stabilize denuded areas by sodding or planting as soon as possible. Replanting should include soil amendments and temporary irrigation. Use high seeding rates to ensure rapid stand establishment.
- Avoid fertilizers and biocides, or apply only during periods of low rainfall to minimize chemical run-off.
- Keep run-off on site.

We also recommend that the following BMPs designed to prevent contamination through and to the wells be included in the EIS:

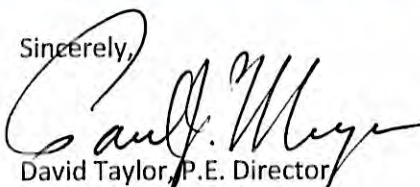
1. Inspect exposed parts of the well periodically for problems such as: cracked or corroded well casing, broken or missing well cap, damage to protective casing, settling and cracking of surface seals.
2. Ensure that the area around the well is sloped so that surface runoff drains away from the well.
3. Provide a well cap or sanitary seal to prevent unauthorized use of or entry into the well.
4. Provide for sediment removal or well cleaning as necessary.
5. Have the well tested once a year for fecal coliform or other constituents that may be of concern.
6. Keep accurate records of any well maintenance, such as disinfection or sediment removal, that might require use of chemicals in the well.
7. Mixing or using pesticides, fertilizers, herbicides, degreasers, fuels, or other pollutants near the well is to be avoided.
8. Do not locate any type of potentially polluting activity within 1,000' of the well for wellhead protection.

Please note that DWS's Draft WHP Ordinance can be found at the following link:

<http://www.mauicounty.gov/DocumentCenter/View/98294>

Should you have any questions, please contact Staff Planner Marti Buckner at 463-3104 or marti.buckner@mauicounty.gov.

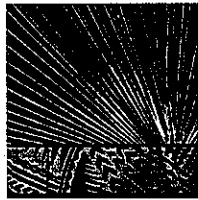
Sincerely,



David Taylor, P.E. Director

mlb

cc: engineering division



**PLANNING
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HAWAII, LLC**

URBAN & REGIONAL PLANNING

Land Use Planning • Sustainability Services • Community Planning • Development Permits

December 12, 2016

Mr. David Taylor, P.E.
Director
County of Maui
Department of Water Supply
200 South High Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Taylor:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated June 20, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following responses:

1. **Source Availability.** The Applicant understands that the Commission on Water Resource Management (CWRM) has jurisdiction over the pumping of the Iao and Waikapu aquifers. Moreover, the Applicant is aware that the Iao Aquifer has a sustainable yield of 20 million gallons per day (mgd) and the Waikapu Aquifer has a sustainable yield of 3 mgd.

The WCT has six wells drilled. Ten-day pump and water quality tests were conducted on three of these wells in April and May 2016. The test results are summarized in Section V.D.4 of the FEIS and are incorporated in their entirety into the FEIS as Appendix I.

The Applicant intends to own and operate the potable and non-potable water system it is developing. However, the system is

being designed in accordance with all applicable State and County requirements for public water systems so that it might be dedicated to the County at a future date. Section V.D.4 of the FEIS has been updated in response to the Department's question.

2. **Consumption.** After consultation with Department of Water Supply engineers, the Project's potable water use was reduced by 33 percent because of the Applicant's proposed use of a dual potable and non-potable water system for irrigation of urban open space, including the irrigation of residential and commercial lots. The 33 percent reduction was based upon consultation with the Department of Water Supply as is documented in the Preliminary Engineering Report (Appendix H of the FEIS). Regarding the proposed "Rural Residential" water use standard, the DWSWSS does not have a value for the potable demand for a Rural Residential designation. The 1,000 gpd/unit used is based on discussion with the Department of Water Supply engineers as an acceptable demand for this designation (See the Preliminary Engineering Report, Appendix H of the FEIS). Section V.D.4 of the FEIS has been updated to address your questions.
3. **Pollution Prevention.** The Applicant appreciates the list of construction phase BPM's and well head protection BMP's provided by the Department. The Project's construction and operation phase BMP's to mitigate water quality impacts are explained in Section V.D.3 and 4 of the FEIS. The Applicant is aware of the County's Draft Wellhead Protection Ordinance.

Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,



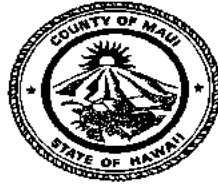
Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

**3. County of Maui, Fire Prevention Bureau, Department of Fire and
Public Safety**

ALAN M. ARAKAWA
MAYOR



JEFFREY A. MURRAY
FIRE CHIEF

ROBERT M. SHIMADA
DEPUTY FIRE CHIEF

COUNTY OF MAUI
DEPARTMENT OF FIRE AND PUBLIC SAFETY
FIRE PREVENTION BUREAU

313 MANEA PLACE . WAILUKU, HAWAII 96793
(808) 876-4690 . FAX (808) 244-1363

February 10, 2016

Planning Consultants Hawaii, LLC
Attn: Michael J. Summers, President
2331 W. Main Street
Wailuku, HI 96793

Re: Waikapu Country Town
Wailuku, Maui, HI
Draft EIS

Dear Michael:

Thank you for the opportunity to provide comment on the referenced subject. At this time, our office provides the following comments:

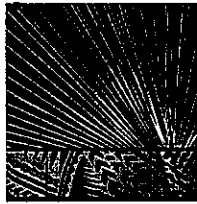
- Our office reserves the right to provide comment during the subdivision process for this project. At that time, fire apparatus access and water supply for fire protection shall be reviewed and approved.
- Our office also reserves the right to provide comment during the building permit process when access, fire protection, and life safety shall be reviewed and approved for proposed buildings within this project.

If there are any questions or comments, please feel free to contact me at (808) 876-4693.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Haake", is written over a faint, circular official stamp.

Paul Haake
Captain, Fire Prevention Bureau



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HAWAII, LLC**

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December 12, 2016

Mr. Paul Haake
Captain
Fire Prevention Bureau
Department of Fire and Public Safety
313 Manea Place
Wailuku, Maui, Hawaii 96793

Dear Mr. Haake:

Re: **Draft Environmental Impact Statement Prepared for the Proposed Waikapu Country Town Project** in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated February 10, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. The Applicant understands that your office desires to provide detailed comments on the project during the processing of the subdivision and building permits.

Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

2331 West Main Street, Wailuku, HI 96793 • Ph. 808-244-6231
msummers@planningconsultantshawaii.com

**4. County of Maui, Department of Housing and Human Concerns,
Housing Division**



DEPARTMENT OF
HOUSING AND HUMAN CONCERNS
HOUSING DIVISION
COUNTY OF MAUI

ALAN M. ARAKAWA
Mayor
CAROL K. REIMANN
Director
JAN SHISHIDO
Deputy Director

35 LUNALILO STREET, SUITE 102 • WAILUKU, HAWAII 96793 • PHONE (808) 270-7351 • FAX (808) 270-6284

February 11, 2016

Mr. Michael J. Summers, President
Planning Consultants Hawaii LLC
2331 W. Main Street
Wailuku, HI 96793

Dear Mr. Summers:

Subject: Draft Environmental Impact Statement (DEIS) for Waikapu Country Town of Maui, Hawaii. TMK's (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036

Thank you for the opportunity to review the Draft Environmental Impact Statement for the subject property. Based on our review, we have determined that the subject project is subject to Chapter 2.96, Maui County Code that a Residential Workforce Housing agreement is required with the Department of Housing and Human Concerns. At the present time, the Department has no additional comments to offer.

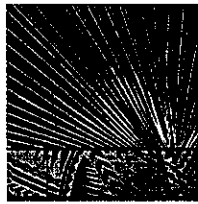
Please call Mr. Veranio Tongson Jr. of our Housing Division at 270-1741 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Buddy A. Almeida", is written over the word "Sincerely,".

BUDDY A. ALMEIDA
Housing Administrator

cc: Director of Housing and Human Concerns
Land Use Commission



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December 12, 2016

Mr. Buddy A. Almeida
Housing Administrator
County of Maui
Department of Housing and Human Concerns
Housing Division
35 Lunalilo Street, Suite 102
Wailuku, Maui, Hawaii 96793

Dear Mr. Almeida:

Re: **Draft Environmental Impact Statement** prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated February 11, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. The Applicant is aware that the project must comply with Chapter 2.96, Maui County Code, and that a Residential Workforce Housing Agreement is required with the Department of Housing & Human Concerns.

Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

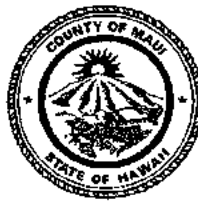
Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

5. County of Maui, Department of Parks and Recreation

ALAN M. ARAKAWA
Mayor



KA'ALA BUENCONSEJO
Director

BRIANNE L. SAVAGE
Deputy Director

DEPARTMENT OF PARKS & RECREATION
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

(808) 270-7230
FAX (808) 270-7934

February 29, 2016

Mr. Michael Summers, President
Planning Consultants Hawaii, LLC
2331 West Main Street
Wailuku, Hawaii 96793

Dear Mr. Summers:

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR
PROPOSED WAIKAPU COUNTRY TOWN,
TMK: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003, (2) 3-6-004:006,
(2) 3-6-005:007 AND (2) 3-6-006:036
WAILUKU, MAUI, HAWAII**

Thank you for the opportunity to review and comment on the subject project. The Department of Parks & Recreation is interested in continuing discussions with the applicant regarding the proposed 18.5-acre Waikapu River Park, to be dedicated to the County as compliance with the park assessment requirements per MCC 18.16.320. The Department would also like to discuss how the proposed project will tie into and augment the neighboring Waikapu Park and Community Center, and the future County Baseyard and Central Maui Regional Park.

Should you have any questions or concerns, please feel free to contact me, or Robert Halvorson, Chief of Planning and Development, at 270-7931.

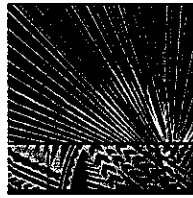
Sincerely,

A handwritten signature in black ink, appearing to read "Ka'ala Buenconsejo", is written over a horizontal line.

KA'ALA BUENCONSEJO
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning and Development

KB:RH:csa



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December 12, 2016

Mr. Ka'ala Buenconsejo
Director
Department of Parks and Recreation
700 Hali'a Nakoa Street, Unit 2
Wailuku, Maui, Hawaii 96793

Dear Mr. Buenconsejo:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated February 29, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project.

The Applicant understands that the project must comply with MCC 18.16.320 and looks forward to discussing the proposed WCT park lands that are proposed to be dedicated to the County for park use. As described in Sections III.B.4 and V.C.1 of the FEIS, the Project is proposing a mix of active and passive parks in a variety of size configurations. The Applicant looks forward to consulting with your Department to ensure that the proposed park lands address both the Project's and the County's park and recreation facility needs.

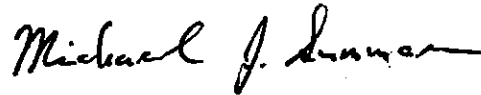
As noted in Section V.C.1 of the FEIS the Applicant will consult with the Parks Department to ensure that the Project's park and recreation facilities are accessible to and compliment neighboring facilities including the Waikapu Park and Community Center, the County baseyard and County Regional Park.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's)

Mr. Ka'ala Buenconsejo
Director
Department of Parks and Recreation
RE: Waikapu Country Town DEIS
December 12, 2016
Page 2

website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

A handwritten signature in black ink, reading "Michael J. Summers". The signature is fluid and cursive, with the first name "Michael" being the most prominent part.

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

6. County of Maui, Department of Planning

ALAN M. ARAKAWA
Mayor

WILLIAM R. SPENCE
Director

MICHELE CHOUTEAU McLEAN
Deputy Director



COUNTY OF MAUI
DEPARTMENT OF PLANNING

March 9, 2016

Mr. Michael J. Summers, President
Planning Consultants Hawaii, LLC
2331 West Main Street
Wailuku, Hawaii 96793

Dear Mr. Summers:

SUBJECT: REQUEST FOR COMMENT ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) PREPARED FOR A PETITION FOR A STATE LAND USE DISTRICT BOUNDARY AMENDMENT AND ANTICIPATED APPLICATIONS FOR A COMMUNITY PLAN AMENDMENT, CHANGE IN ZONING AND PROJECT DISTRICT FOR THE PROPOSED WAIKAPU COUNTRY TOWN, LOCATED AT WAIKAPU, ISLAND OF MAUI, HAWAII; TMK: (2) 3-6-002:003 (POR), (2) 3-6-004:003 (POR), (2) 3-6-004:006 (POR), AND (2) 3-6-005:007 (POR) (EAC 2016/0001)

The Department of Planning (Department) is in receipt of the above-referenced document for the proposed Waikapu Country Town (Project). On April 29, 2015, the State of Hawaii Land Use Commission agreed to be the Accepting Authority pursuant to Chapter 343, Hawaii Revised Statutes; and determined that the proposed action may have a significant impact upon the environment to warrant proceeding directly to the preparation of an EIS. On June 9, 2015, the Department sent a letter to the Applicant providing comments in reference to an EIS Preparation Notice.

The Department, after a review of the Draft EIS, thanks the Applicant for addressing issues including, but not limited to, Project consistency with County Plans and Zoning, Project impacts and mitigation measures related to roadway infrastructure, utilities, drainage, water supply, wastewater, and viewplanes, and Project connections with adjacent neighborhoods. The visual streetscapes in the Draft EIS help to provide a "sense of place" of the proposed community.

The Department anticipates using the Final EIS as an information document during the review process by the State of Hawaii Land Use Commission, Maui Planning Commission, and Maui County Council. The Department anticipates receiving a copy of the Final EIS for review.

Mr. Michael J. Summers, President
March 9, 2016
Page 2

Thank you for the opportunity to comment on this Project of considerable magnitude and impact to the Maui Island community. Should you have any questions about the comments in this letter, please contact Staff Planner Kurt Wollenhaupt by email at kurt.wollenhaupt@mauicounty.gov or by phone at (808) 270-1789.

Sincerely, —

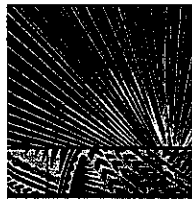
A handwritten signature in black ink, appearing to read 'W. Spence', with a long horizontal flourish extending to the right.

WILLIAM SPENCE
Planning Director

xc: Clayton I. Yoshida, AICP, Planning Program Administrator (PDF)
John S. Rapacz, Planning Program Administrator (PDF)
Kurt F. Wollenhaupt, Staff Planner (PDF)
Project File
General File

WRS:CIY:KFW:aj

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December 12, 2016

Mr. William Spence
Director
Department of Planning
County of Maui
One Main Plaza Building
2200 Main Street, Suite 315
Wailuku, Maui, Hawaii 96793

Dear Mr. Spence:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated March 9, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project.


The Applicant is pleased that the Department found our response to your letter dated June 9, 2015 helpful and that the streetscape simulations helped convey a sense of place for the project. The Applicant is aware that the FEIS will serve as an information document in support of the Applicant's request for a District Boundary Amendment, Community Plan Amendment and Change in Zoning. We look forward to working closely with your Department through the entitlement process.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also

Mr. William Spence
Director
Department of Planning
RE: Waikapu Country Town DEIS
December 12, 2016
Page 2

be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

A handwritten signature in black ink that reads "Michael J. Summers". The signature is written in a cursive style with a long, sweeping underline.

Michael J. Summers
President

Attachment

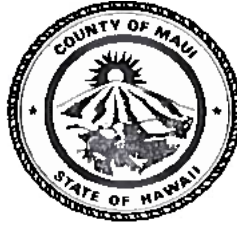
c: Mr. Michael Atherton
Mr. Albert Boyce

7. County of Maui, Department of Environmental Management

ALAN M. ARAKAWA
Mayor

STEWART STANT
Director

MICHAEL M. MIYAMOTO
Deputy Director



MICHAEL RATTE
Solid Waste Division

ERIC NAKAGAWA, P.E.
Wastewater Reclamation Division

**COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**
2050 MAIN STREET, SUITE 2B
WAILUKU, MAUI, HAWAII 96793

April 13, 2016

Mr. Michael Summers
Planning Consultants Hawaii, LLC
2331 W. Main Street
Wailuku, Hawaii 96793

**SUBJECT: WAIKAPU COUNTRY TOWN
DRAFT ENVIRONMENTAL IMPACT STATEMENT
TMK (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003, (2) 3-6-004:006,
(2) 3-6-005:007, (2) 3-6-006:036, WAILUKU, MAUI**

We reviewed the subject application and have the following comments:

1. Solid Waste Division comments:
 - a. The contractor must apply to the Central Maui Landfill to dispose of construction waste and obtain a project number. Information is available at www.mauicounty.gov or from the web with the inquiry, "Maui County C&D."
2. Wastewater Reclamation Division (WWRD) comments:
 - a. The development will not be allowed to connect to the existing County wastewater collection system and treatment plant.
 - b. The Wailuku-Kahului Wastewater Reclamation Facility does not have the capacity to accept flows from outside the current service area.
 - c. The existing collection system is inadequate and unable to accept flows from this development without significant upgrades.
 - d. Developer shall work with the County of Maui and adjacent developers to complete a master planned treatment solution for the Waikapu area.
 - e. Developer shall contribute their fair share to the implementation of the final treatment solution.
 - f. The Department of Environmental Management and the Wastewater Reclamation Division will provide additional comments

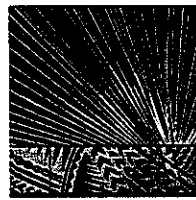
Mr. Michael Summers
April 13, 2016
Page 2 of 2

upon review of the Preliminary Engineering Report prepared for the
EIS.

If you have any questions regarding this memorandum, please contact Michael
Miyamoto at 270-8230.

Sincerely,


J/ STEWART STANT
Director of Environmental Management



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December 12, 2016

Mr. Stewart Stant
Director
Department of Environmental Management
County of Maui
2050 Main Street, Suite 2B
Wailuku, Maui, Hawaii 96793

Dear Mr. Stant:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated April 13, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following:

Solid Waste Division Comments

- 1.a The Applicant understands that during the construction phase, the contractor (s) must apply to the Central Maui Landfill to dispose of construction waste and obtain a project number.

Wastewater Division Comments

- 2.a The Applicant understands that the project will not be allowed to connect to the Wailuku-Kahului Wastewater Treatment Plant and Collection System.

- 2.b The Applicant is aware that the Wailuku-Kahului Wastewater Treatment Plant does not have capacity to accept flows from outside of the service area.
- 2.c The Applicant is aware that the existing collection system is inadequate and unable to accept flows from the subject development without significant upgrades.
- 2.d. *Master Planned Treatment Solution for Waikapu.* The Applicant intends to construct a private wastewater treatment package plant to service the Project's wastewater demand. This plant will also produce R1 and R2 effluent that will be used for agricultural irrigation and irrigation of the Project's parks and open space. The Project's wastewater impacts and proposed private treatment plant are described in detail in Sections III.B.8, V.D.5 and VIII.6 of the FEIS and in Appendices H, J and K of the FEIS.

The Applicant is supportive of the development of a master planned wastewater treatment solution for Waikapu. It would be necessary for such a facility to be available concurrently with the build-out of the Project. While the Applicant intends to pursue its private treatment plant, it welcomes the opportunity to coordinate its plans with the County and adjacent developers.

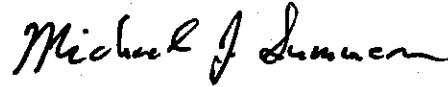
- 2.e *Fair-share Cost Sharing.* As noted, the Applicant intends to develop a private wastewater treatment package plant to service the Project's wastewater treatment demand. However, should the County be able to assure that a centralized Waikapu wastewater treatment facility, or other treatment option is available concurrently with the buildout of the Project, then the Applicant would consider participating in the development of a regional facility.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions,

Mr. Stewart Stant
Director
Department of Environmental Management
RE: Waikapu Country Town DEIS
December 12, 2016
Page 3

please contact me at (808) 269-6220 or by e-mail at
msummers@planningconsultantshawaii.com.

Sincerely yours,

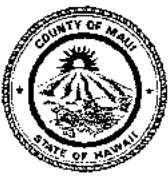
A handwritten signature in black ink that reads "Michael J. Summers". The signature is written in a cursive, flowing style.

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

8. County of Maui, Police Department



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

February 25, 2016

Mr. Michael J. Summers
President
Planning Consultants Hawaii LLC
2331 W. Main Street
Wailuku, HI 96793

Dear Mr. Summers:


SUBJECT: DEA Waikapu Country Town

This is in response to your letter, requesting comments and information on the above project.

We have reviewed the Draft Environmental Impact Statement prepared for the project. Please refer to the enclosed copy of a report submitted by Officer Michael Vaituulala from Wailuku Patrol.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Assistant Chief  Victor K. Ramos
for: Tivoli S. Faaumu
Chief of Police

c: Mr. William Spence, Planning Dept.

Enclosure

TO : TIVOLI S. FAAUMU, CHIEF OF POLICE, COUNTY OF MAUI
VIA : CHANNELS
FROM : MICHAEL VAITUULALA, POLICE OFFICER III, COMMUNITY
POLICING
SUBJECT : RESPONSE FOR DAFT ENVIRONMENTAL IMPACT
STATEMENT (DEIS) FOR WAIKAPU COUNTRY TOWN

THE MAIN ROADWAYS
ARE QUICKLY REACHING
THEIR DESIGN LIMITATIONS.
UPGRADES/IMPROVEMENT TO ROADWAYS
SHOULD BE COMPLETED FIRST.

Victor Ramos
Assistant Chief

02/26/16

This communication is submitted as a response to a request for review and comment for Waikapu Country Town from Michael SUMMERS, President of the Planning Consultant Hawaii LLC:

PROJECT : WAIKAPU COUNTRY TOWN
TMK # : (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003,
(2) 3-6-004:006, (2) 3-6-005:007, and (2) 3-6-006:036
PERMIT NO. : CPA 2015/0001, CIZ 2015/0001, and PH1 2015/0001
APPLICANT : Mr. Michael ATHERTON, Waikapu Properties LLC.
ADDRESS : 1670 Honoapiilani Highway, Waikapu, Hawaii 96793
DESCRIPTION : A mixed-used residential community proposed for
Development on approximately 499 acres within and
around the Maui Tropical Plantation, Wailuku Maui
Hawaii.

RESPONSE:

In review of the submitted documents, concerns from the police perspective area upon the safety of pedestrian and vehicular movement.

Mr. Michael ATHERTON of Waikapu Properties LLC is the applicant of the Waikapu Country Town. This project is located about 2 miles south of Wailuku and is adjacent to the southern boundary of Waikapu. Four Hundred eighty five (485) of the subject acres are in the State and County Agricultural Districts. Entitlement changes will be sought to bring these lands into appropriate urban and rural designations.

The project includes a diversity of housing types, neighborhood commercial, employment uses, an elementary school, parks and open space. The proposed project will comprise about 1,433 residential units and nearly 200,000 square feet of commercial space. The project includes an approximate 8-mile network of pedestrian and bicycle paths. The applicant desires to establish an agricultural park, farmers market, a limited amount of renewable energy production and other permissible uses on these lands.

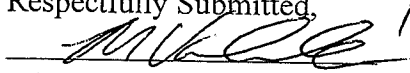
There are residences and existing business' in close proximity to this project. During the construction phases, extreme efforts should be made to minimize noise, dust, and debris so not to inhibit those whose health and well being may be affected. Adequate traffic control devices and personnel should also be utilized to minimize the impacts to pedestrian and vehicular movement by the heavy equipment and vehicles traveling in and out of the area. It is the duty of the project manager to examine the impact of vehicular movement within the area while work is conducted on this project.

This project is expected to increase vehicular traffic along Waiale Road, Waiko Road, and Honoapiilani Highway. It is also important to consider proper and adequate lighting during evening, late night, and early morning hours during construction and after the project is completed.

CONCLUSION:

There are no objections to the progression of this project at this time, from the Police standpoint, in regards to pedestrian and vehicular movement.

Respectfully Submitted,

 13964
Michael VAITUULALA E#13964

Police Officer III / Community Policing

02/24/16 @ 1200 hrs

Recommend approval;

This residential/commercial/

agricultural project will be on and around the Maui Tropical Plantation.

The only traffic problem is entering/exiting Honoapiilani Highway, which should be manned appropriately by flagmen. Police to monitor for additional safety concerns as well.

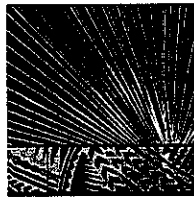
A/Capt. Wade M. Maeda

02/24/16

Addition of nearly 1,500 residential housing units and commercial units poses concerns for the current roadway infrastructure in place. Namely, the intersections closest to the development. Suggest improvements or additions to the already congested nearby intersections, primarily during school hours.

Heather M. GILROY

02/24/16 @ 1530 hours



**PLANNING
CONSULTANTS
HAWAII, LLC**

URBAN & REGIONAL PLANNING

Land Use Planning • Sustainability Services • Community Planning • Development Permits

December 12, 2016

Mr. Tivoli S. Faaumu
Chief of Police
Police Department
County of Maui
55 Mahalani Street
Wailuku, Maui, Hawaii 96793

Dear Mr. Faaumu:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated February 25, 2016 regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following:

1. ***Construction Phase Impacts.*** Please note that construction phase Best Management Practices (BMP's) will be implemented to mitigate dust, noise, drainage and traffic impacts that are unique to the construction phase of the development. These BMP's are documented in Sections V.A.2 and 3 and Sections V.D.1 and 3 of the Final Environmental Impact Statement (FEIS).
2. ***Construction Phase Traffic Mitigation.*** Prior to implementation of construction a construction phase traffic control plan will be prepared to discuss staging of construction, hours of construction, anticipated vehicles and equipment, traffic control and dust control. Section V.D.1 of the FEIS documents that a Construction Phase Traffic Mitigation Plan will be prepared prior to construction of the project.

3. **Operation Phase Traffic Impacts.** Please note that a Traffic Impact Analysis Report (TIAR) was prepared to address the Project's impacts to vehicular and pedestrian traffic. The TIAR is summarized in Section V.D.1 of the FEIS and incorporated in its entirety into the FEIS as Appendix L. In response to agency and public comments received during the review of the DEIS, additional traffic analysis has been conducted and has been incorporated into the Section V.D.1 of the FEIS.
4. **Project Lighting.** Note that the project will include lighting designed in accordance with County standards for urban and rural areas.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,



Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

9. State of Hawaii, Department of Accounting and General Services

DAVID Y. IGE
GOVERNOR



DOUGLAS MURDOCK
Comptroller

AUDREY HIDANO
Deputy Comptroller

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

FEB - 9 2016

(P)1025.6

Michael Summers, President
Planning Consultants Hawaii LLC
2331 W. Main Street
Wailuku, Hawaii 96793

Dear Mr. Summers:

Subject: Draft Environmental Impact Statement for the
Waikapu Country Town Project
Wailuku, Maui, Hawaii
TMK: (2) 3-6-002:001, 003, (2) 3-6-004:003, 006, (2) 3-6-005:007 and
(2) 3-6-006:036

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may please contact Ms. Dora Choy of the Planning Branch at (808) 586-0488.

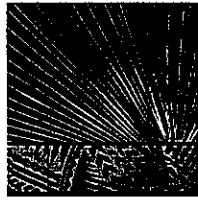
Sincerely,

A handwritten signature in black ink, appearing to read "James K. Kurata".

JAMES K. KURATA
Public Works Administrator

DC:lmn

c: Mr. Wade Shimabukuro, District Engineer, MDO



**PLANNING
CONSULTANTS
HAWAII, LLC**

URBAN & REGIONAL PLANNING

Land Use Planning • Sustainability Services • Community Planning • Development Permits

December 12, 2016

Mr. James K. Kurata
Public Works Administrator
State of Hawaii, Department of Accounting and General Services
P.O. Box 119, Honolulu, Hawaii 96810-0119

Dear Mr. Kurata:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated February 9, 2016, which states that you do not have comments at this time since the Project does not impact any of the Department's projects or facilities.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

**10. State of Hawaii, Department of Land and Natural
Resources, Land Division**

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

March 24, 2016

Planning Consultants Hawaii, LLC
Attention: Mr. Michael J. Summers, President
2331 W. Main Street
Wailuku, Hawaii 96793

Dear Mr. Summers:

SUBJECT: Draft Environmental Impact Statement (DEIS) for Waikapu Country Town

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 blue ink, appearing to read "Russell Y. Tsuji", is written over a light blue circular stamp.

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: 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

February 4, 2015

MEMORANDUM

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

FROM: *PD.* Russell Y. Tsuji, Land Administrator
SUBJECT: Draft Environmental Impact Statement (DEIS) for Waikapu Country Town
LOCATION: Wailuku, Island of Maui; TMK Nos: (2) 3-6-002:001,003; 3-6-004:003,006;
3-6-005:007 and 3-6-006:036
APPLICANT: Waikapu Properties, LLC

Transmitted for your review and comment is information on the above referenced project. Please submit any comments by **March 23, 2016**.

Only one (1) copy of the CD is available for your review in Land Division office, Room 220.

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: *Cy S*

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

Date: *2/10/16*

cc: Central Files

RECEIVED
LAND DIVISION
FEB 05 PM 02:16
ENGINEERING
2016 FEB 10 PM 3:01
OFFICE OF LAND & NATURAL RESOURCES

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

LD/ Russell Y. Tsuji

**REF: DEIS for Waikapu Country Town, Wailuku, Maui
Maui.007**

COMMENTS

- () We confirm that the parcel/project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones X. The National Flood Insurance Program does not regulate developments within Zones X.
- (X) **Please take note that the majority of project site, according to the data in the Flood Insurance Rate Map (FIRM) is located in Zone X.** The National Flood Insurance Program does not regulate developments within Zones X.
- (X) **Please also note that there are existing streams, ditches and gulches that run through the project per review of the FIRM. These areas are designated as Zone AEF, in which the National Flood Insurance Program regulates developments within a Zone AEF as indicated in bold letters below.**
- (X) **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.
- (X) **Ms. 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 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: _____

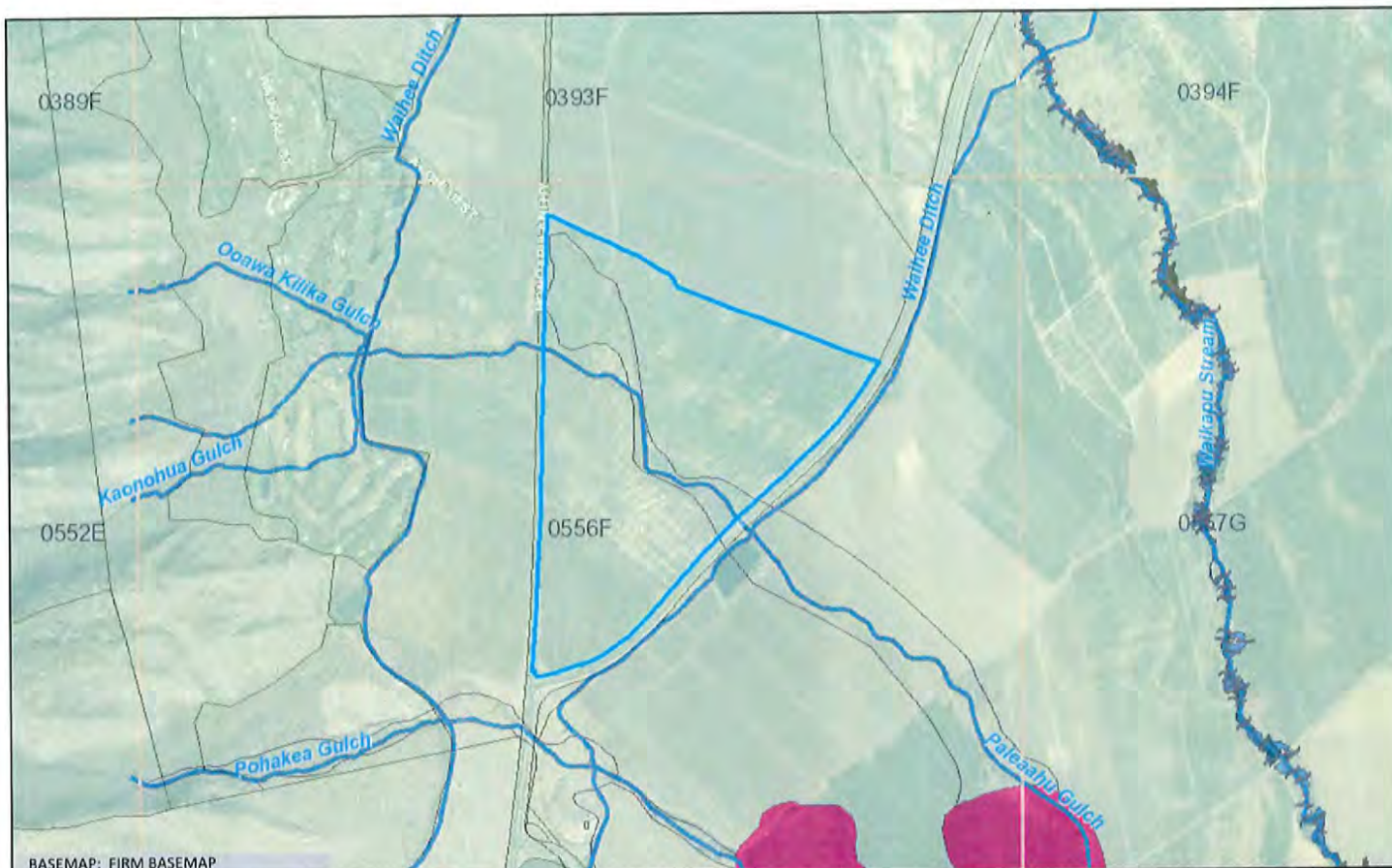
Should you have any questions, please call Mr. Rodney Shiraishi of the Planning Branch at 587-0258.

Signed: _____

CARTY S. CHANG, CHIEF ENGINEER

Date: _____

2/10/16



Flood Hazard Assessment Report

www.hawaiiinfip.org

TMK (2) 3-6-002:001

Property Information

COUNTY: MAUI
 TMK NO: (2) 3-6-002:001
 WATERSHED: POHAKEA; WAIKAPU
 PARCEL ADDRESS: HONOAPIILANI HWY
 WAILUKU, HI 96793

Notes:

Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 04, 2015
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL: 1500030556F
 PANEL EFFECTIVE DATE: SEPTEMBER 25, 2009

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://dlnr.hawaii.gov/dam/>



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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 applies, but coverage is available in participating communities.
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Flood Hazard Assessment Report

www.hawaiiifip.org

TMK (2) 3-6-002-003

Property Information

COUNTY: MAUI
 TMK NO: (2) 3-6-002-003
 WATERSHED: IAO; WAIKAPU
 PARCEL ADDRESS: HONOAPIILANI HWY
 WAILUKU, HI 96793

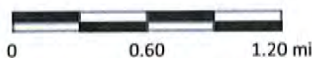
Notes:

Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 04, 2015
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL - EFFECTIVE DATE: 1500030393F - NOVEMBER 04, 2015
 1500030556F - SEPTEMBER 25, 2009

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://dlnr.hawaii.gov/dam/>



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FLOOD HAZARD ASSESSMENT TOOL LAYER LEGEND (Note: legend does not correspond with NFHL)

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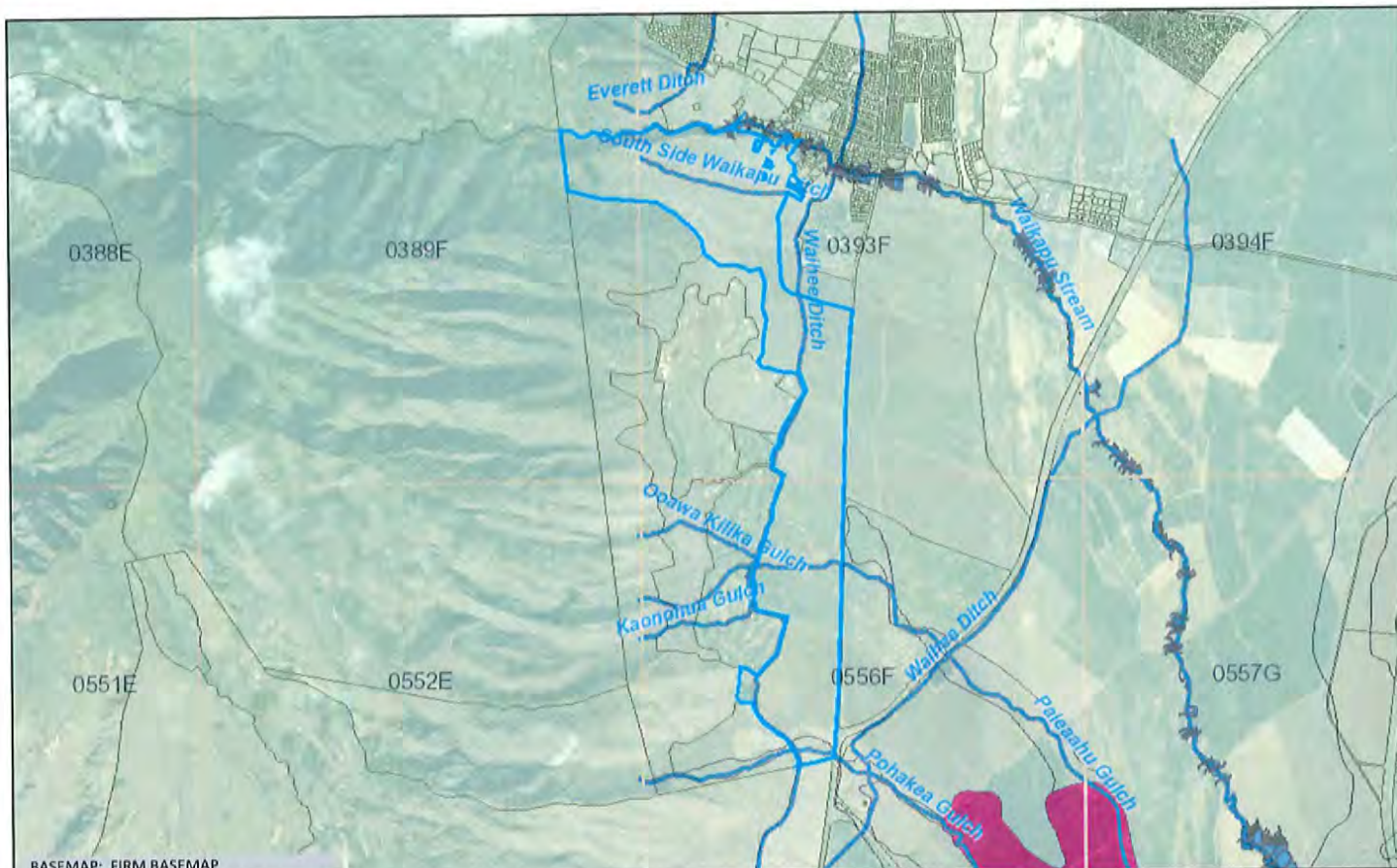
	Zone A: No BFE determined.
	Zone AE: BFE determined.
	Zone AH: Flood depths of 1 to 3 feet (usually areas of ponding); BFE determined.
	Zone AO: Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.
	Zone V: Coastal flood zone with velocity hazard (wave action); 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 applies, but coverage is available in participating communities.
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Flood Hazard Assessment Report

www.hawaiiifip.org

TMK (2) 3-6-004:003

Property Information

COUNTY: MAUI
 TMK NO: (2) 3-6-004:003
 WATERSHED: POHAKEA; WAIKAPU
 PARCEL ADDRESS: HONOAPIILANI HWY
 WAILUKU, HI 96793

Notes:

Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 04, 2015
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL - EFFECTIVE DATE:
 1500030389F - NOVEMBER 04, 2015
 1500030393F - NOVEMBER 04, 2015
 1500030556F - SEPTEMBER 25, 2009

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://dlnr.hawaii.gov/dam/>



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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.
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Flood Hazard Assessment Report

www.hawaiiinfip.org

TMK (2) 3-6-004:006

Property Information

COUNTY: MAUI
 TMK NO: (2) 3-6-004:006
 WATERSHED: WAIKAPU
 PARCEL ADDRESS: 2000 HONOAPIILANI HWY
 WAILUKU, HI 96793

Notes:

Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 04, 2015
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL: 1500030393F
 PANEL EFFECTIVE DATE: NOVEMBER 04, 2015

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://dlnr.hawaii.gov/dam/>



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FLOOD HAZARD ASSESSMENT TOOL LAYER LEGEND

(Note: legend does not correspond with NFHL)

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	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 applies, but coverage is available in participating communities.
--	---



Flood Hazard Assessment Report

www.hawaiiifip.org

TMK (2) 3-6-005:007

Property Information

COUNTY: MAUI
 TMK NO: (2) 3-6-005:007
 WATERSHED: WAIKAPU
 PARCEL ADDRESS: 1670 HONOAPIILANI HWY
 WAILUKU, HI 96793

Notes:

Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 04, 2015
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL: 1500030393F
 PANEL EFFECTIVE DATE: NOVEMBER 04, 2015

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://dlnr.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 applies, but coverage is available in participating communities.
--	---



Flood Hazard Assessment Report

www.hawaiiinfip.org

TMK (2) 3-6-006:036

Property Information

COUNTY: MAUI
 TMK NO: (2) 3-6-006:036
 WATERSHED: WAIKAPU
 PARCEL ADDRESS: WAIKAPU
 WAILUKU, HI 96793

Notes:

Flood Hazard Information

FIRM INDEX DATE: NOVEMBER 04, 2015
 LETTER OF MAP CHANGE(S): NONE
 FEMA FIRM PANEL: 1500030393F
 PANEL EFFECTIVE DATE: NOVEMBER 04, 2015

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://dlnr.hawaii.gov/dam/>



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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 applies, but coverage is available in participating communities.
--	--

DAVID Y. IGE
GOVERNOR OF HAWAII

RECEIVED
LAND DIVISION



2016 MAR 18 AM 10:49

DEPT. OF LAND &
NATURAL RESOURCES
STATE 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

February 4, 2015

MEMORANDUM

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:

Draft Environmental Impact Statement (DEIS) for Waikapu Country Town

LOCATION:

Wailuku, Island of Maui; TMK Nos: (2) 3-6-002:001,003; 3-6-004:003,006;
3-6-005:007 and 3-6-006:036

APPLICANT:

Waikapu Properties, LLC

Transmitted for your review and comment is information on the above referenced project. Please submit any comments by **March 23, 2016**.

Only one (1) copy of the CD is available for your review in Land Division office, Room 220.

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: /s/ Jeffrey T. Pearson, P.E.

Print Name: Deputy Director

Date: March 14, 2016

cc: Central Files

RFD 4185.6
13801

DAVID Y. IGE
GOVERNOR OF HAWAII



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

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

March 14, 2016

REF: RFD.4185.6

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

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

SUBJECT: Draft Environmental Impact Statement (DEIS) for Waikapu Country Town

FILE NO.: RFD.4185.6
TMK NO.: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003, (2) 3-6-004:006, (2) 3-6-005:007, (2) 3-6-006:036

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>.

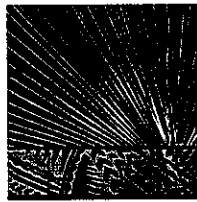
Our comments related to water resources are checked off below.

- ☒ 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 EPA 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/iid.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.

- ☒ 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 report should discuss the projected non-potable water requirements for the project and the calculations for determining non-potable water needs. Potential alternative water sources to meet the non-potable needs should be identified and analyzed, such as the development of an onsite or regional wastewater reclamation facility to serve area non-potable needs.

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



**PLANNING
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December 12, 2016

Mr. Russell Y. Tsuji
Land Administrator
State of Hawaii
Department of Land and Natural Resources
Land Division
Post Office Box 621
Honolulu, Hawaii 96809

Dear Mr. Tsuji:

Re: **Draft Environmental Impact Statement Prepared for the Proposed**
Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2)
3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007
and (2) 3-6-006:036.

Thank you for your letter dated March 24, 2016, regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to comments provided by the Engineering Division dated February 10, 2016 and the Commission on Water Resource Management dated March 14, 2016, please find the following:

Engineering Division Comments

- The Applicant understands that the majority of the Project is located with Zone X, according to the data in the Flood Insurance Rate Map (FIRM). The National Flood Insurance Rate Program does not regulate developments within Zone X.
- The Applicant understands that there are portions of the subject site that are located within Zone AEF and that these areas are subject to

National Flood Insurance Rate Program regulations.

- The Applicant acknowledges that the rules and regulations of the National Flood Insurance Program (NFIP), presented in Title 44 of the Code of Federal Regulations, will apply when development is proposed within a Special Flood Hazard Area. The Applicant further understands that Maui County's flood hazard ordinance may be more restrictive than the minimum NFIP standards in which case the local standards will apply.

Commission on Water Resource Management (CWRM) Comments

- ***County Water Use and Development Plan.*** Note that the Applicant has been in consultation with the County's Department of Water Supply (DWS) for several years regarding the Project's potable and non-potable water plans. Moreover, the Applicant did receive a letter from the DWS dated March 14, 2016 in response to the DEIS. The Applicant's response letter to the DWS has been incorporated into the FEIS (See Appendix S). Section V.D.4 of the FEIS has been updated to confirm the Project's potable and non-potable water demand and proposed sources of supply.
- ***Agricultural Water Use and Development Plan.*** The Applicant received comment letters from the Department of Agriculture dated June 22, 2015 and March 30, 2016. The DOA requested documentation of the Project's projected irrigation demand, irrigation supply and plans for the Project's irrigation infrastructure. The Applicant's December 12, 2016 response to the DOA documents the project's projected irrigation demand, irrigation supply and plans for the Project's irrigation infrastructure. Section V.D.4 of the FEIS has been updated to confirm the Project's potable and non-potable water demand and proposed sources of supply.
- ***Water Efficient Fixtures.*** The Applicant notes that water efficient fixtures will be installed throughout the development and that water efficient practices, such as using non-potable water for irrigation and utilizing water conserving drip irrigation, will be implemented to conserve potable water resources. Sections III.B.6 and V.D.4 of the FEIS documents the Project's water conservation measures.

- ***Stormwater Runoff.*** The Applicant notes that BMPs will be implemented to manage stormwater runoff in a manner that minimizes the Project's impact to the natural hydrology and helps to facilitate stormwater recharge of the Waikapu Aquifer. The Project's stormwater management program will also treat runoff through the use of swales, detention basins and filtration systems, where appropriate, to minimize non-point source pollution to inland and coastal waters. Section V.D.3 of the FEIS documents the stormwater BMP's that will be incorporated into the Project.
- ***Alternative Water Sources.*** The Applicant is proposing to use non-potable water for irrigation of urban landscape planting and irrigation of agricultural lands. A dual water system for non-potable and reclaimed wastewater will be developed for these purposes. Section V.D.4 of the FEIS describes the Project's dual water system.
- ***Hawaii Green Business Program.*** The Applicant will review and consider its participation in the Hawaii Green Business Program and appreciates having this information made available by the Commission.
- ***Landscape Irrigation.*** The Applicant will incorporate landscape planting BMPs into the landscape planting and irrigation plan to conserve irrigation water. The Applicant's landscape architect is familiar with the BMP practices that are endorsed by the Landscape Industry Council of Hawaii and the referenced publication. Landscape irrigation BMP's are described in Sections III.B.6 and V.5.4 of the FEIS.
- ***Ground Surface Water Degradation/Contamination.*** The State Department of Health has reviewed both the EISPN and the DEIS and has provided comments on each. Our responses to the DOH's comments have been incorporated in the FEIS. The State DOH will be consulted as the project proceeds through the land use entitlement and building permit processes.
- ***Non-potable water requirements.*** Irrigation of the Project's agricultural lands will be from surface water from the Iao Stream via the Iao-Waikapu Ditch and Waikapu Stream via the South Waikapu Ditch and

Waihee Ditch, which are operated by the Wailuku Water Company. This system has historically provided irrigation water to WCT's agricultural lands, which were used to grow kalo and then later sugarcane and pineapple. The Applicant's use of surface water from the Iao and Waikapu streams for irrigation will require the issuance of surface water use permits from the CWRM.

In addition to Ditch water, the Applicant proposes to drill agricultural wells and pump non-potable water that will be stored in agricultural reservoirs and also used for irrigation. The agricultural wells will require the completion of pump and water quality tests and approval of ground water use permits from the CWRM before pumping can occur. An additional source of non-potable irrigation water will be recycled water from WCT's wastewater reclamation facility. At full build-out of the WCT development, the wastewater reclamation facility is expected to be able to generate approximately 650,000 gallons per day of recycled water. Table 1 documents the potential supply of non-potable water versus the Project's potential demand for irrigation of its urban landscape planting areas and agricultural lands.

Table 1: WCT's Potential Supply and Demand for Non-Potable Irrigation Water

Non-Potable Water Source	Estimated Historical Supply in MGD	Estimated Future Supply in MGD	Estimated WCT Demand in MGD	Surplus/ Deficit in MGD
Ditch Water ¹	5.82 ²	5.82		
Pumped Well Water	N/A	Unknown		
Reclaimed Wastewater	N/A	.650		

¹ WCT's future use of ground water from the Iao and Waikapu Streams will require the issuance of a Surface Water Use Permit from the Commission on Water Resources Management. These permit requests have been filed but not yet issued.

² Based upon a water duty of 5408 gallons per acre per day (GAD). In the Na Wai Eha IIFS proceedings, the Commission on Water Resources Management determined that this was a reasonable daily water use requirement for sugarcane cultivation.

Non-Potable Water Source	Estimated Historical Supply in MGD	Estimated Future Supply in MGD	Estimated WCT Demand in MGD	Surplus/ Deficit in MGD
TOTAL	5.82	6.47	3.42 ³	+3.05

As is shown in Table 1, it is expected that sufficient non-potable irrigation water should be available to irrigate the agricultural lands as well as the urban and rural open space lands. Section V.D.4 of the FEIS has been updated to address your questions.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,



Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

³ Assumes a demand for 2.75 mgd to irrigate 1077 acres of agricultural lands based upon a water duty of 3400 GAD for diversified agriculture. This is the application rate used by the State Department of Agriculture for diversified crops. The estimate assumes that 75 percent of the crop land is being irrigated at any given time $(1077 \cdot .75) \cdot 3,400 \approx 2.75$ MGD. Urban open space demand for non-potable irrigation water is estimated to be about 0.67 mgd.

- 11. State of Hawaii, Department of Land and Natural
Resources, State Historic Preservation Division**

DAVID Y. IGE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

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

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON
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

March 24, 2016

MEMORANDUM

TO: Russell Y. Tsuji, Land Administrator
DLNR Land Division
Via email to: Russell.Y.Tsuji@hawaii.gov

Log No: 2016.00248/2015.01944
Doc No: 1603MD35
Archaeology

A handwritten signature in black ink, appearing to read "Morgan E. Davis".

FROM: Morgan E. Davis, Lead Archaeologist Maui Section

SUBJECT: **Chapter 6E-42 Historic Preservation Review-
Draft Environmental Impact Statement for the Proposed Waikapu Country Town
Waikapū Ahupua‘a, Wailuku District, Island of Maui
TMK (2) 3-6-002:001, 003; 3-6-004:003, 006; 3-6-005:007 and 3-6-006:036**

Thank you for the subject memorandum that we received on February 8, 2016. The Waikapu Country Town DEIS has been prepared for associated permit applications for a State Land Use Commission District Boundary Amendment; a County Community Plan Amendment; a County Change in Zoning; a Project District Approval; Subdivision Approval; NPDES Permits; and Building Permits.

The proposed Waikapu Country Town is a mixed-use residential community of approximately 499 acres. The project includes mixed housing totaling 1,433 residential units and 200,000 square feet of commercial space; approximately eight miles of pedestrian and bicycle paths; and 1,077 acres for an agricultural component. An archaeological inventory survey was conducted for this project and a report submitted to SHPD for review and approval in 2013; historic properties are present within the project area. I have just learned that this report was not reviewed; a review is currently in process. We will copy you on the upcoming review correspondence.

Please contact me at (808) 243-4641 or Morgan.E.Davis@hawaii.gov if you have any questions or concerns about this memorandum.

cc: County of Maui
Department of Planning
(Planning@co.maui.hi.us)

County of Maui
Department of Public Works – DSA
(Renee.Segundo@co.maui.hi.us)

County of Maui
Cultural Resources Commission
(Annalise.Kehler@co.maui.hi.us)

Michael J. Summers, President
Planning Consultants Hawaii, LLC
(msummers@planningconsultantshawaii.com)

Lisa Rotunno-Hazuka, Owner
Archaeological Services Hawaii, LLC
(lisa@ashmaui.com)



**PLANNING
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December 12, 2016

Ms. Morgan E. Davis
Lead Archaeologist Maui Section
State of Hawaii, Department of Land and Natural Resources
State Historic Preservation Division
Kakuhihewa Building, 601 Kamokila Blvd., STE 535
Kapaolei, Hawaii 2016

Dear Ms. Davis:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed
Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2)
3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007
and (2) 3-6-006:036.

Thank you for your letter dated March 24, 2016, which states that the above-referenced Archaeological Inventory Survey was received by your office in 2013, but has not yet been reviewed. We look forward to receiving your comments at your earliest convenience.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

2331 West Main Street, Wailuku, HI 96793 • Ph. 808-244-6231
msummers@planningconsultantshawaii.com

12. State of Hawaii, Department of Agriculture

DAVID Y. IGE
Governor

SHAN S. TSUTSUI
Lt. Governor



State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

SCOTT E. ENRIGHT
Chairperson, Board of Agriculture

PHYLLIS SHIMABUKURO-GEISER
Deputy to the Chairperson

March 30, 2016

Mr. Michael Summers, President
Planning Consultants Hawaii, LLC
2331 W. Main Street
Wailuku, HI 96793

Dear Mr. Summers:

Subject: Draft Environmental Impact Statement (DEIS) for
Waikapu Country Town
Waikapu Properties
TMK: (2) 3-6-002:001; (2) 3-6-002:003; (2) 3-6-004:003; (2) 3-6-004-006;
(2) 3-6-005:007; (2) 3-6-006:036
Area: 1,576 acres

The Hawaii Department of Agriculture (HDOA) offers the following comments to the DEIS for the Waikapu Country Town development project (project).

BACKGROUND:

The 1,576-acre project site is located on both sides of Honoapi'ilani Highway, two miles south of Wailuku. 1,562 acres is in the State Agricultural District and 14 acres in the Urban District. Approximately 499 acres are planned for residential and commercial development in two phases, of which 485 acres is currently in the State Agricultural District. Currently the majority of the 1,576-acre project site is used for sugarcane cultivation by Hawaiian Commercial & Sugar Company (HC&S), cattle grazing by Michael Atherton, and diversified agriculture including Kumu Farms and Hawaii Taro LLC. The DEIS states that Kumu Farms and Hawaii Taro will relocate their operations to the proposed agricultural park and other lands within the Project area. The cattle herd will likely remain on the mauka agricultural lands even after urbanization occurs.

The DEIS states that the Maui Island Plan (MIP) designates the 499 acres in the project area set aside for residential and commercial development to be within its Small Town Growth Boundary or Rural Growth Boundary and is identified as the "Tropical Plantation Town Planned Growth Area." The MIP allocates 1,433 residential units and supporting commercial and civic uses to the designated growth area. The remaining agricultural lands in the project area does not seem to be in a grown boundary in the MIP.



COMMENTS/RECOMMENDATIONS:

Management of the Proposed Agricultural Park

The DEIS states that 1,077 acres of land will remain in agriculture, with approximately 800 of those acres planned to be permanently dedicated to agricultural use through an agricultural easement. Several hundred acres within the 800-acre agricultural easement is proposed to be developed as an agricultural park. The remaining 277 acres may be subdivided into as many as five large agricultural lots where farm dwellings may be permitted. According to the DEIS, the entity who will manage the park and whether it will be a private or public park is still being considered. Management of the agricultural lands and infrastructure in the project area is critical for establishing and maintaining agriculture, and the Final Environmental Impact Statement (FEIS) should contain any updated information on the management plans for the 800 acres dedicated to agricultural use and the public or private agricultural park.

Impact of the Closure of the Hawaiian Sugar and Commercial Company

As noted above, HC&S currently farms a significant portion of the project site. HC&S has recently stated their intention of shutting down their sugar operations in Maui. The FEIS should discuss whether the discontinuation of sugar cultivation by HC&S affects the planned agricultural component of the project, and if so, provide alternative plans.

The DEIS states that current HC&S operations and diversified agricultural operations receives its agricultural water from the Wailuku Water Company from the Iao-Waikapu Ditch and the Waikapu Stream through the South Waikapu Ditch and the Waihee Ditch. HC&S reportedly uses between 8 and 10 million gallons per day (MGD) of ditch water. For any HC&S lands currently irrigated by the Iao-Waikapu Ditch located in the project area, the FEIS should detail permitting requirements for continued access to irrigation water in quantities sufficient to meet needs throughout the year from the system after HC&S ceases sugarcane cultivation.

Irrigation Water Issues

The DEIS also mentions that five on-site ground water wells have been drilled to be used for potable and irrigation demands of the project. Three of those wells have been designated for potable use and two wells for irrigation. The capacity of the irrigation wells are 500 gallons per minute (gpm) and 650 gpm. The DEIS does not indicate whether the Commission of Water Resource Management (CWRM) has approved an allocation for the irrigation wells. The DEIS states that CWRM designated the sustainable yield of the Waikapu Aquifer at 3 MGD, and that the estimated daily demand for potable water would be around 646,000 gallons per day. The FEIS should include estimated total irrigation demand particularly during the dry periods of the year, proof of adequacy of supply to meet maximum demand, and details of existing and planned irrigation infrastructure including reservoirs. The DEIS should also include information on how the operation and maintenance of the wells, ditches, and reservoirs will be managed. For your information, the HDOA, for planning purposes, uses an

application rate of 3,400 gallons per acre per day which is our standard irrigation water application rate for diversified crops ("Agricultural Water Use and Development Plan", December 2004 revision, page xiv).

Proposed Solar Energy Facilities

From the DEIS, it seems that the Applicant is contemplating installation of two or more 5-acre solar farms in the mauka fields of the project area. HDOA notes that much of the mauka fields are rated "B" by the Land Study Bureau. According to Section 205-4.5(20) & (21), Hawaii Revised Statutes (HRS), solar energy facilities on "B" rated land cannot comprise of more than 10 percent of acreage of the parcel or 20 acres of land without a special use permit. Therefore, if the 5-acre solar farm is located on a parcel of land less than 50 acres in size, a special use permit will be required. HDOA also recommends that compatible agricultural uses such as a goat or sheep operation be considered in conjunction with any solar energy farms.

Protection of Agricultural Activities from Nuisance Complaints

The DEIS acknowledges that agricultural operations can produce nuisance impacts to neighboring residential communities, and that the Applicant is committed to providing assurances to farmers that their operations will be protected from such complaints pursuant to Chapter 165, HRS. Reference should also be made to Section 205-4.6, HRS that prevents agricultural uses or activities from being limited or prohibited through private restrictions.

The HDOA notes that the project includes an elementary school located mauka of Waiale Road. The likelihood of nuisance issues from adjacent agricultural activities should be considered when determining the school's location within the project site.

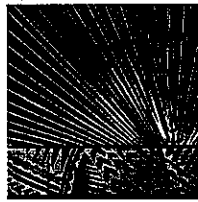
Thank you for the opportunity to provide our comments. Should you have any questions, please contact Earl Yamamoto at 973-9466 or by email at earl.j.yamamoto@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott E. Enright".

Scott E. Enright, Chairperson
Board of Agriculture

c: Maui County Planning Department
Office of Planning



**PLANNING
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December 12, 2016

Mr. Scott E. Enright, Chairperson
State of Hawaii
Department of Agriculture
✓ 1428 South King Street
Honolulu, Hawaii 96814-2512

Dear Mr. Enright:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed
Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2)
3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007
and (2) 3-6-006:036.

Thank you for your letter dated March 30, 2016, regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following:

1. **Management of the Proposed Agricultural Park.** The following WCT property owners, Waikapu Properties, LLC and Waiale 905 Partners, intend to manage the 800-acre Agricultural Preserve. These entities are currently leasing lands in support of the ongoing operations of the following farmers:
 - Kumu Farms;
 - Hoaloa Farms;
 - Makani Olu Ranch; and
 - Beef and Bloom.

The management, upkeep and maintenance of the agricultural lands, together with the on-site agricultural wells and other WCT owned supporting infrastructure will be the responsibility of the above-referenced property owners. The Wailuku Water Company (WWC) will continue to be responsible for the maintenance of its agricultural reservoirs and ditch systems. Sections III.B.5 and V.A.7 of the FEIS have been updated to address your comments.

2. Impact of the Closure of Hawaiian Sugar and Commercial Company.

- The Closure of HC&S operations within the 800-acre Agricultural Preserve will create new opportunities for diversified agricultural enterprises on Maui. Waikapu Properties, LLC and Waiale 905 Partners are working with the existing farmers that are leasing WCT's agricultural lands to identify the additional lands that will best meet each farmer's needs. It is currently envisioned that the lands farmed by HC&S will be transitioned into "truck" crops (fruits and vegetables), "canoe" crops (banana, sweet potato, coconuts, etc.), Taro and ranching. Moreover, it is anticipated that additional opportunities for producing energy crops, fiber crops, coffee and nursery crops within the Agricultural Preserve, and on the other lands that will remain within the Agricultural District, will arise for the following reasons:
 - High soil productivity;
 - Excellent topography;
 - Reliable and cost effective sources of irrigation water;
 - Proximity to markets, infrastructure and employment;
 - Affordable and long-term agricultural lease rents.

Waikapu Properties LLC has requested to the CWRM that HC&S's surface water use permit requests for an allocation of water from the Na Wai Eha be assigned to Waikapu Properties so that irrigation of the lands once leased by HC&S from Waikapu Properties can continue to be irrigated with ditch water. It should be noted that much of these lands are within the 800-acre Agricultural Preserve. Sections III.B.B, V.A.7 and V.D.4 of the FEIS have been updated to address your comments.

3. Irrigation Water Issues.

Please note that the DEIS stated that five (5) wells had been drilled on-site; however, it is six (6) wells that have been drilled on-site. Three (3) of the six (6) wells have undergone pump and water quality testing and the results of the tests are summarized in Section V.D.4 of the FEI; the complete results of the pump and water quality tests have also been incorporated into the FEIS as Appendix I. The Applicant has not requested an allocation from the CWRM for the irrigation wells. Such a request will be forthcoming once the CWRM has accepted the pump test results for the Project's potable wells.

As noted above, irrigation of the Project's agricultural lands will be from surface water from the Iao Stream via the Iao-Waikapu Ditch and Waikapu Stream via the South Waikapu Ditch and Waihee Ditch, which are operated by the Wailuku Water Company (WWC). These water sources, which are part of the larger surface water system known as the "Na Wai Eha", have been designated by the CWRM as a Surface Water Management Area. Before drawing water from the Na Wai Eha, a surface water use permit will be required from the CWRM, which has regulatory jurisdiction over the aquifer. This system has historically provided irrigation water to WCT's agricultural lands, which were once used to grow Kalo and then later transitioned to sugarcane and pineapple production.

In addition to Ditch water, the Applicant proposes to use its agricultural wells and pump non-potable water that will be stored in agricultural reservoirs and also used for irrigation. The use of the agricultural wells will require a ground water use permit from the CWRM since the water would be drawn from the Waikapu Aquifer, which has been designated by the CWRM as a Ground Water Management Area. An additional source of non-potable irrigation water will be recycled water from the WCT's wastewater reclamation facility. At full build-out of the WCT development, the wastewater reclamation facility is expected to produce approximately 650,000 gallons per day of recycled water. Table 1

documents the potential supply of non-potable water versus the Project's potential demand for irrigation of its urban landscape planting areas and agricultural lands.

Table 1: WCT's Potential Supply and Demand of Non-Potable Irrigation Water

Non-Potable Water Source	Estimated Historical Supply in MGD	Estimated Future Supply in MGD	Estimated WCT Demand in MGD	Surplus/ Deficit in MGD
Ditch Water ¹	5.82 ²	5.82		
Pumped Well Water	N/A	Unknown		
Reclaimed Wastewater	N/A	.650		
TOTAL	5.82	6.47	3.42 ³	+3.05

As is shown in Table 1, it is expected that should surface and groundwater permits be issued by the CWRM, sufficient non-potable irrigation water will be available to irrigate the Project's agricultural lands as well as its urban and rural open space lands.

The Applicant intends to establish a private water company to manage, operate, and maintain its water and wastewater systems. The private water company will be responsible for the WCT's on-site agricultural irrigation water sources, storage and distribution

¹ WCT's future use of ground water from the Iao and Waikapu Streams will require the issuance of a Surface Water Use Permit from the Commission on Water Resources Management. These permit requests have been filed but not yet issued.

² Based upon a water duty of 5408 gallons per acre per day (GAD). In the Na Wai Eha IIFS proceedings, the Commission on Water Resources Management determined that this was a reasonable daily water use requirement for sugarcane cultivation.

³ Assumes a demand for 2.75 mgd to irrigate 1077 acres of agricultural lands based upon a water duty of 3400 GAD for diversified agriculture. This is the application rate used by the State Department of Agriculture for diversified crops. The estimate assumes that 75 percent of the crop land is being irrigated at any given time $(1077 \times .75) \times 3,400 \approx 2.75$ MGD. Urban open space demand for non-potable irrigation water is estimated to be about 0.67 mgd.

systems. Sections III.B.5 and 8 and Section V.D.4 and 5 of the FEIS have been updated to address your comments.

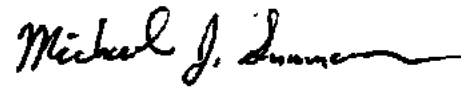
4. **Proposed Solar Energy Facilities.** The Applicant understands that Section 205-4.5 (20) & (21), Hawaii Revised Statutes (HRS), solar energy facilities on "B" rated land cannot comprise of more than 10 percent of the acreage of the parcel or 20 acres of land without the issuance of a special use permit. The Applicant will work to incorporate onto agricultural lands that may be used for solar energy facilities crop or livestock types, where practical, that might be compatible with any renewable energy use. Sections III.B.5 and V.A.7 of the FEIS addresses your comments.
5. **Protection of Agricultural Activities from Nuisance Complaints.** The Applicant is aware of Hawaii's Right to Farm Act (Chapter 165, HRS) and that the Act provides protections to farmers that their operations will be protected from nuisance complaints. Moreover, pursuant to Section 205-4.6, the Project's agricultural lands will not be subject to restrictions that limit the types of agricultural uses that may be conducted on these lands.

The WCT's elementary school site is mauka of the proposed Waiale Bypass Road. The school will be located in close proximity to the County's future regional park and government facilities complex. The closest agricultural lands are located approximately 3,300 feet to the southeast. With the strong prevalence of northeast tradewinds through the project site and implementation of agricultural land management and chemical application BMPs, the elementary school should not be significantly impacted by agricultural uses. Section V.A.7 of the FEIS addresses your comments.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Mr. Scott E. Enright
Chairperson
Department of Agriculture
RE: Waikapu Country Town DEIS
Deceber 12, 2016
Page 6

Sincerely yours,

A handwritten signature in black ink, reading "Michael J. Summers". The signature is written in a cursive style with a long, horizontal flourish at the end.

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

13. State of Hawaii, Department of Defense

DAVID Y. IGE
GOVERNOR



ARTHUR J. LOGAN
MAJOR GENERAL
ADJUTANT GENERAL

KENNETH S. HARA
BRIGADIER GENERAL
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

March 24, 2016

Planning Consultants Hawaii, LLC
2331 West Main Street
Wailuku, Hawaii 'i 96793

Attn.: Mr. Michael Summers, President

Subject: Draft Environmental Impact Statement for Waikapu County Town, Wailuku,
Maui, Hawaii, TMK: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003, (2) 3-6-
004:006, (2) 3-6-005:007, and (2) 3-6-006:036

Dear Mr. Summers:

Thank you for the opportunity to comment on the above project. The State of Hawaii
Department of Defense has no additional comments to offer relative to the project.

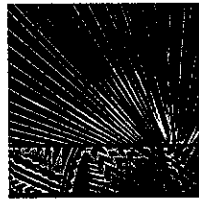
Should you have any questions, please contact Mr. Lloyd Maki, Assistant Chief Engineering
Officer at (808) 733-4250.

Sincerely,

Kenneth S. Hara
ARTHUR J. LOGAN
Major General
Hawaii National Guard
Adjutant General

for

c: Ms. Havinne Okamura, Hawaii Emergency Management Agency



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December 12, 2016

Mr. Arthur J. Logan
Major General, State of Hawaii
Department of Defense
Office of the Adjutant General
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

Dear Mr. Logan:

Re: **Draft Environmental Impact Statement Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.**

Thank you for your letter dated March 24, 2016, which states that you do not have any additional comments at this time regarding the above-referenced project.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,

Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

14. State of Hawaii, Department of Education



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

March 23, 2016

Mr. Michael J. Summers
Planning Consultants Hawaii LLC
2331 W. Main Street
Wailuku, Hawaii 96793

Re: Draft Environmental Impact Statement for Waikapu Country Town,
Wailuku, MauiTMK: 3-6-002:001, 3-6-002:003, 3-6-004:003, 3-6-004:006,
3-6-005:007, and 3-6-006:036

The Department of Education (DOE) has reviewed the Draft Environmental Impact Statement for Waikapu Country Town.

The proposed project is located within the Central Maui School Impact District, which was adopted by the Board of Education on November 18, 2010. As authorized under Hawaii Revised Statutes (HRS) §302A-1601 through 1612 and §46-142.5, the Waikapu Country Town development will be required to pay school impact fees for each and every residential unit developed. Waikapu Properties LLC is requested to meet with the DOE to execute an Educational Contribution Agreement (ECA) prior to any approval by the State Land Use Commission as it will determine the amount of and when school impact fees will become payable. HRS §302A-1606 states in relevant part that:

"Prior to approval of any change of zoning, subdivision, or any other approval for a:

(A) Residential development with fifty or more units; or

(B) Condominium property regime development of fifty or more units, the department shall notify the approving agency of its determination on whether it will require the development to dedicate land, pay a fee in lieu thereof, or a combination of both for the provision of new school facilities. "

It is DOE's standard practice to memorialize this decision in an ECA prior to notifying the approving agency of this determination.

Mr. Michael J. Summers

March 23, 2016

Page 2

DOE would also like to offer clarity on two statements offered by the applicant. Regarding any affordable housing component of this project, the only exemptions from school impact fee law that shall apply are detailed under HRS §302A-1603. Any other provision of law that involve exemptions from subdivision and zoning standards and run contrary to this authority shall not apply. The State of Hawaii, Office of Planning and Hawaii Housing Financing & Development Corporation have taken a specific position in support of DOE's exclusive authority to exempt.

DOE would also state for the record that any land that is dedicated per its school impact fee program shall be designed, built and operated to provide general public school education to any and all school-aged children within the general vicinity of the school site. Charter and other specialized schools that would exclude and or limit admission to the general population of school-aged children would not satisfy the requirements of DOE's school impact fee program.

Thank you for the opportunity to comment. If you have any questions, please call Heidi Meeker of the Planning Section, Facilities Development Branch at (808) 377-8301.

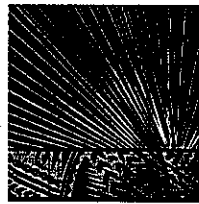
Sincerely yours,



Duane Y. Kashiwai
Public Works Administrator

DYK:tto

c: Baldwin/King Kekaulike/Maui High Complex Area Superintendent



**PLANNING
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HAWAII, LLC**

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December 12, 2016

Mr. Duane Y. Kashiwai
Public Works Administrator
State of Hawaii
Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Mr. Kashiwai:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.


Thank you for your letter dated March 23, 2016, regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following responses:

- **School Impact Fees.** The Applicant understands that the Project will be required to pay impact fees pursuant to the requirements of Hawaii Revised Statutes (HRS) §302A-1601 through 1612 and §46-142.5. Section V.C.5 of the FEIS documents the land dedication and impact fees that are required of the Project.
- **Educational Contribution Agreement (ECA).** The Applicant will work with the DOE to finalize an ECA prior to the granting of the subject entitlements.

- ***Affordable Housing.*** The Applicant understands that County work-force housing and/or housing developed pursuant to HRS 201H does not qualify for an exemption to DOE impact fees.
- ***General Public School Education.*** The Applicant acknowledges that lands dedicated per the DOE's impact fee program must be developed to provide general public school education and that Charter and other specialized schools that would exclude and or limit admission to the general population of school-aged children would not satisfy the requirements of DOE's school impact fee program.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,



Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce

**15. State of Hawaii, Department of Health, Environmental
Planning Office**



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 16-038

February 10, 2016

Mr. Michael Summers, President
Planning Consultants Hawaii, LLC
2331 W. Main Street
Wailuku, Hawaii 96793
Email: msummers@planningconsultantshawaii.com

Dear Mr. Summers:

SUBJECT: Draft Environmental Impact Statement (DEIS) for Waikapu Country Town, Wailuku, Maui
TMK: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-004:003, (2) 3-6-004:006, (2) 3-6-005:007 and
(2) 306-006:036

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your DEIS to our office via the OEQC link:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Maui/2010s/2016-02-08-MA-5E-DEIS-Waikapu-Country-Town.pdf

EPO strongly recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. EPO has recently prepared draft Environmental Health Management Maps for each county. They are online at: <http://health.hawaii.gov/epo/egis>

We suggest you review the requirements for the National Pollutant Discharge Elimination System (NPDES) permit. We recommend contacting the Clean Water Branch at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov after relevant information is reviewed at:

1. <http://health.hawaii.gov/cwb>
2. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/standard-npdes-permit-conditions>
3. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/forms>

Please note that all wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems". We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please review online guidance at: <http://health.hawaii.gov/wastewater> and contact the Planning and Design Section of the Wastewater Branch at 586-4294.

EPO recommends you review the need and/or requirements for a Clean Air Branch permit. The Clean Air Branch can be consulted via e-mail at: Cab.General@doh.hawaii.gov or via phone: (808) 586-4200.

EPO also suggests that the Hazard Evaluation and Emergency Response (HEER) Office's Site Discovery and Response (SDAR) Section be contacted. The SDAR section protects human health and the environment by identifying, investigating, and remediating sites contaminated with hazardous substances (non-emergency site

Mr. Michael Summers
Page 2
February 10, 2016

investigations and cleanup). The HEER Office's SDAR Section can be contacted at: (808) 586-4249. For historical maps on lands where sugarcane was grown see: <http://health.hawaii.gov/epo/egis/sugarcane>

EPO encourages you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

You may also wish to review the draft Office of Environmental Quality Control (OEQC) viewer at: <http://eha-web.doh.hawaii.gov/oeqc-viewer> This viewer geographically shows where previous Hawaii Environmental Policy Act (HEPA) (Hawaii Revised Statutes, Chapter 343) documents have been prepared.

In order to better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at: <http://www2.epa.gov/ejscreen>

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,



Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

LM:nn

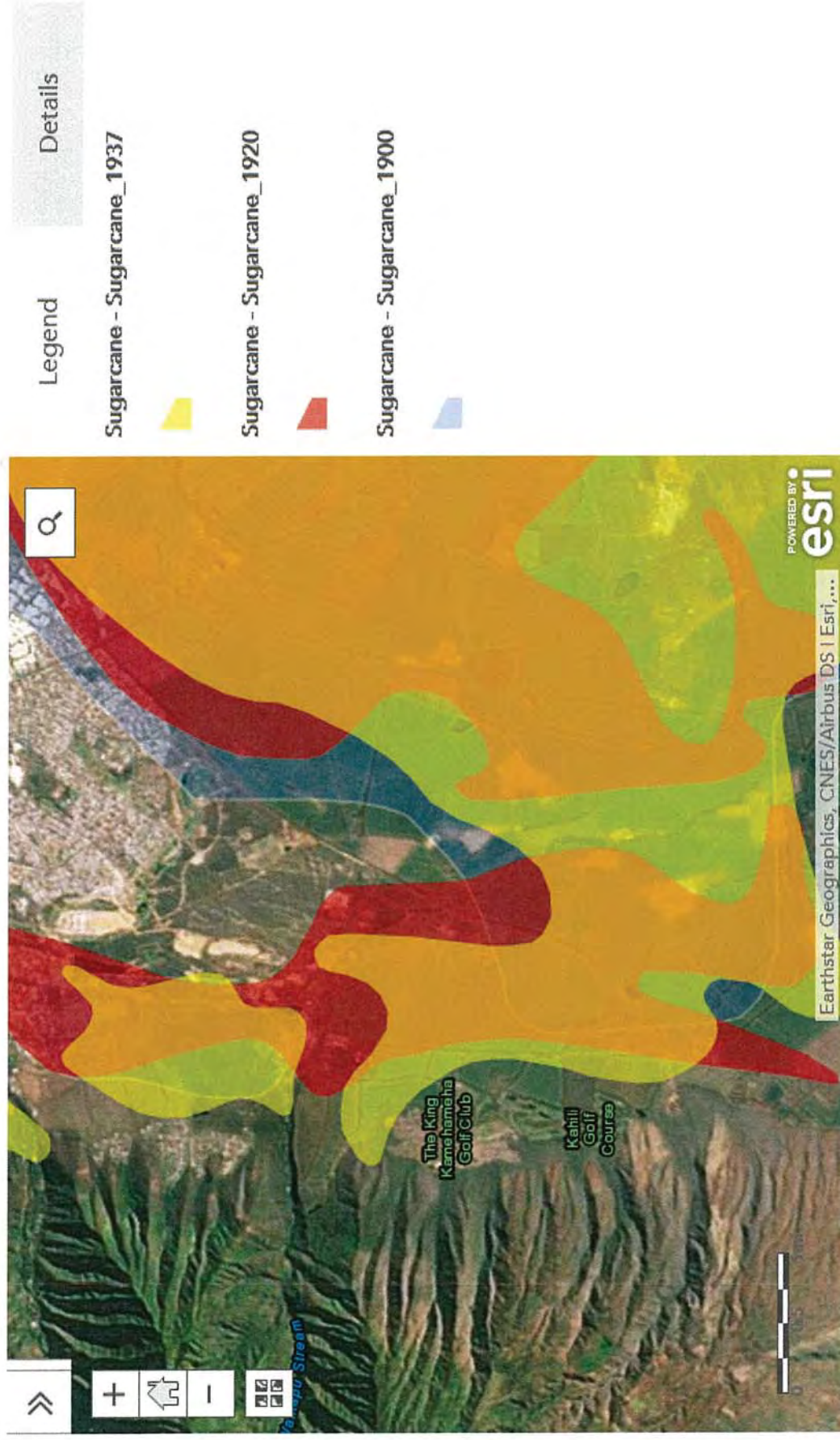
- Attachment 1: EPO Draft Environmental Health Management Map
- Attachment 2: EPO Historic Sugarcane Map
- Attachment 3: OEQC Viewer Map of Area
- Attachment 4: U.S. EPA EJSCREEN Report

c: Applicant: Michael Atherton, Waikapu Properties, LLC
Daniel Orodener, State Land Use Commission, Dept. of Business, Economic Development and Tourism
DOH: DHO Maui, CWB, WWB, SDWB, CAB, HEER (via email only)



MAP INTENDED FOR ILLUSTRATIVE PURPOSES ONLY. SITE LOCATIONS ARE APPROXIMATE.

HISTORIC SUGARCANE LANDS MAP VIEWER



waikapu

3 sites found

Results

Filter

Show sites with no location

Waikapu Light Industrial Project (FEA-FONS)
Environmental Assessment (Applicant)

BASEYARD SUBDIVISION WAIKAPU (FEA-FONS)
Environmental Assessment (Applicant)

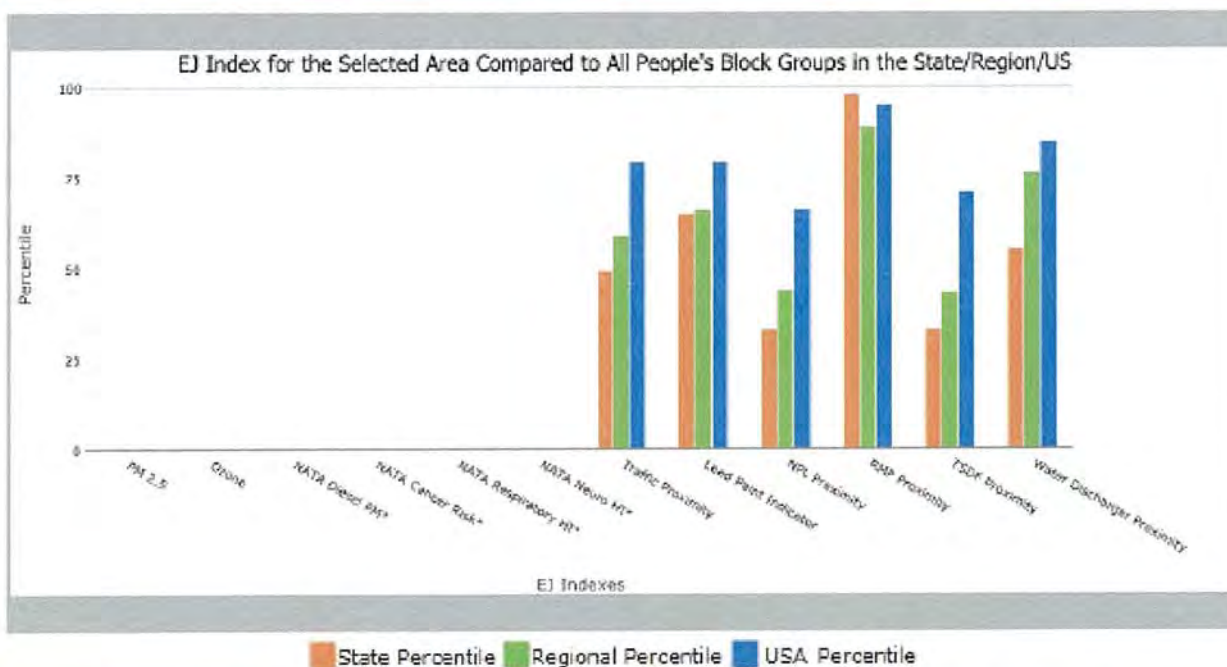
Waikapu Light Industrial Project (DEA-AFNS)
Environmental Assessment (Applicant)



for 1 mile Ring Centered at 20.846415,-156.505547, HAWAII, EPA Region 9

Approximate Population: 2305

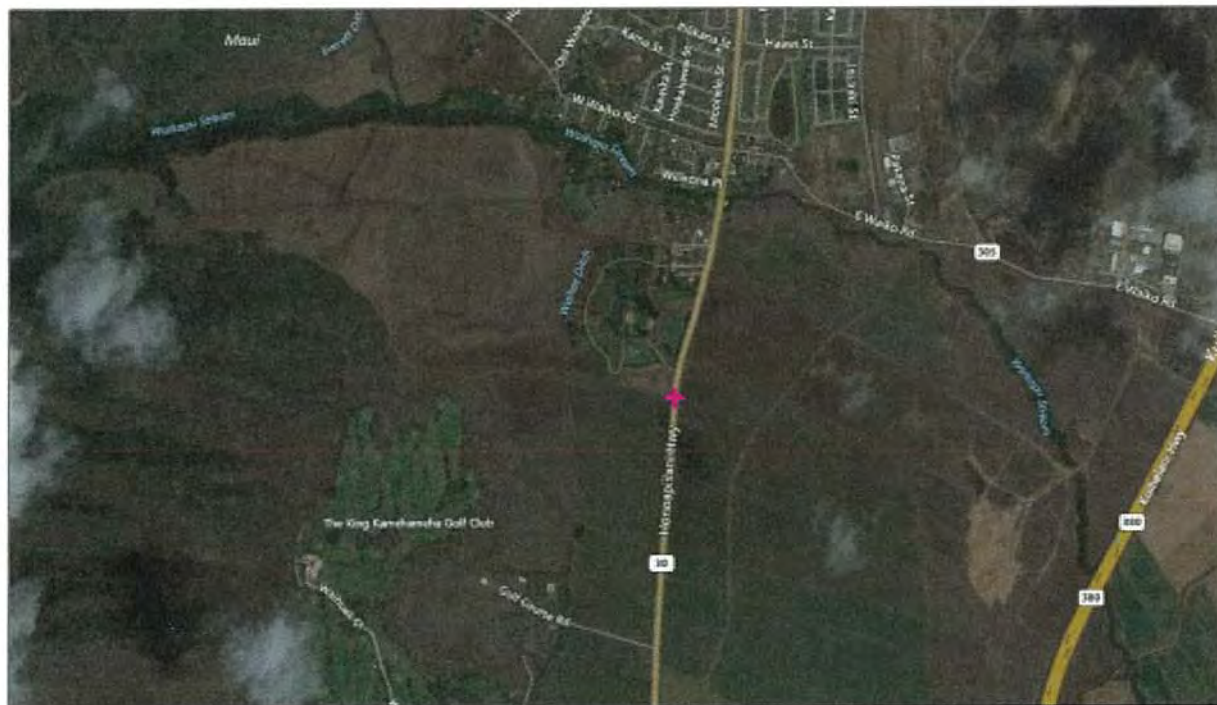
Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	49	59	79
EJ Index for Lead Paint Indicator	65	66	79
EJ Index for Proximity to NPL sites	33	44	68
EJ Index for Proximity to RMP sites	98	89	95
EJ Index for Proximity to TSDFs	33	43	71
EJ Index for Proximity to Major Direct Dischargers	55	76	85



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

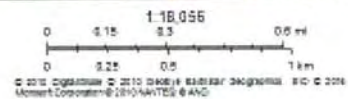
for 1 mile Ring Centered at 20.846415, -156.505547, HAWAII, EPA Region 9

Approximate Population: 2305



February 9, 2016

+ Digitized Point



EJSCREEN Report

for 1 mile Ring Centered at 20.846415,-156.505547, HAWAII, EPA Region 9

Approximate Population: 2305



Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	48.1	N/A
NATA Diesel PM ($\mu\text{g}/\text{m}^3$) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	37	280	33	190	32	110	51
Lead Paint Indicator (% Pre-1960 Housing)	0.12	0.17	51	0.25	48	0.3	37
NPL Proximity (site count/km distance)	0.0057	0.092	22	0.11	6	0.096	2
RMP Proximity (facility count/km distance)	0.95	0.18	98	0.41	89	0.31	92
TSDF Proximity (facility count/km distance)	0.0061	0.092	25	0.12	2	0.054	14
Water Discharger Proximity (facility count/km distance)	0.16	0.33	36	0.19	64	0.25	59
Demographic Indicators							
Demographic Index	48%	51%	38	46%	54	35%	72
Minority Population	82%	77%	49	57%	73	38%	86
Low Income Population	13%	25%	27	35%	18	34%	18
Linguistically Isolated Population	2%	6%	35	9%	26	5%	54
Population With Less Than High School Education	5%	10%	32	18%	23	14%	25
Population Under 5 years of age	8%	6%	75	7%	66	7%	71
Population over 64 years of age	10%	14%	30	12%	51	13%	40

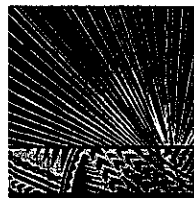
^{*} The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

February 09, 2016

3/3



**PLANNING
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URBAN & REGIONAL PLANNING

Land Use Planning • Sustainability Services • Community Planning • Development Permits

December 12, 2016

Mr. Laura Leialoha Phillips McIntyre, AICP
Program Manager
Environmental Planning Office
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Ms. McIntyre:

Re: **Draft Environmental Impact Statement** Prepared for the Proposed Waikapu Country Town Project in Waikapu, Maui, Hawaii; TMK Nos: (2) 3-6-002:001, (2) 3-6-002:003, (2) 3-6-4:003, (2) 3-6-004:006, (2) 3-6-005:007 and (2) 3-6-006:036.

Thank you for your letter dated February 10, 2016, regarding the Draft Environmental Impact Statement (DEIS) prepared for the above-referenced project. In response to your comments, please find the following responses:

- ***Sustainable and Healthy Design.*** The Applicant is committed to developing a community that achieves greater social, economic and environmental sustainability and therefore appreciates the resources made available at health.hawaii.gov/epo/landuse and health.hawaii.gov/epo/egis. Section III.B.6 documents the Project's sustainability goals, objectives and strategies.
- ***National Pollutant Discharge Elimination System (NPDES).*** The Applicant will coordinate with the Clean Water Branch to ensure NPDES requirements are addressed.
- ***Wastewater Plans.*** The Applicant understands that its wastewater treatment plan must conform to the applicable provisions of the Department's Administrative Rules, Chapter 11-62, "Wastewater Systems".

- **Clean Air Branch.** Please note that the Clean Air Branch has been consulted and the Applicant has received their comments in response to the DEIS, which have been addressed and incorporated into the FEIS.
- **Hazard Evaluation and Emergency Response Office's Site Recovery and Response (SDAR) Section.** The Applicant will consult with the SDAR to address any issues that might arise with respect to hazardous substances within the property boundaries.
- **DOH On-line Resources.** The Applicant appreciates the on-line resources offered through the Hawaii Environmental Health Portal, the OEQC HEPA viewer, and the EPA EJSCREEN tool.

The WCT's Final Environmental Impact Statement (FEIS) can be downloaded from the State Office of Environmental Quality Control's (OEQC's) website and the State Land Use Commission's website. The document may also be downloaded from www.waikapu.com. Thank you very much for your interest in this important Central Maui project. Should you have any questions, please contact me at (808) 269-6220 or by e-mail at msummers@planningconsultantshawaii.com.

Sincerely yours,



Michael J. Summers
President

Attachment

c: Mr. Michael Atherton
Mr. Albert Boyce